

Rochdale Metropolitan Borough Council
ROCHDALE MBC
Economy and Environment
Planning Service
Rochdale
OL16 1XU

29th October 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007

ARIEN APPLIANCES, JOHN STREET, ROCHDALE, OL16 2HP: ERECTION OF D-POSTER ADVERTISEMENT

Please find enclosed an application for advertisement consent for a freestanding digital-48 sheet advertisement at the above site. The site has been selected due to its suitability for advertising and will help to establish a network of displays in the area. It will be capable of being operated from a central location and significantly reduce vehicle trips for reposting when compared with a traditional poster and paste billboard.

This proposal is part of an industry wide drive to rationalise, modernise and upgrade advertising infrastructure to meet modern requirements. In addition to converting some of the better located sites to digital, in many instances this will mean removing inappropriately located or poorly performing paper and paste advertisements and developing new sites in better locations. The overall strategy is to reduce the numbers of displays to deliver premium sites in the best locations, capable of supporting multiple advertising campaigns and providing a piece of digital infrastructure adaptable to a wide range of uses.

The Applicant

Wildstone Estates Limited is part of the Wildstone Group, an outdoor media infrastructure provider that owns and manages the land and equipment required for advertising. Their advertising assets are then rented to operators, who sell the advertising space to local and national companies for various advertising campaigns.

Outdoor Advertising is now widely recognised by lenders as a property class, allowing it to attract new investment and innovation. As an outdoor media infrastructure provider, Wildstone has invested in the development of hardware in the form of the "D-Poster" panel, which is a high-quality ultra-thin display that offers a high level of control over brightness and reduced energy consumption. The control mechanisms in place enable the D-Poster to mimic a traditional 48 sheet poster during the day and ensure that it is muted and at a suitable contrast to the ambient light at night time.

As landlords, Wildstone will always have a long-term investment in their sites regardless of who the tenant is and will manage their assets to ensure that the sites are well maintained and the displays are operating in line

with planning conditions. Any problems arising from the sites can therefore be dealt with by a single controlling party.

As the largest owner of advertising assets in the Country and landlord to all of the major operators, Wildstone are now also in a strong position to be able to push best practice. Through partnership with the media operators and screen maintenance and monitoring contractors, new systems of control have already been established to help manage the operation of the displays.

Content is controlled remotely in real time from a Network Operation Centre (NOC) and the sites are monitored remotely 24/7 to facilitate responsive maintenance. Engineers are located nationwide to be able to respond within 24 hours to any issues that cannot be dealt with remotely. Diagnostics software can report any small technical faults (e.g. a broken panel) so that a kill switch can turn the content to black until the engineer can reach the site.

The Proposal

The proposal seeks to erect a D-Poster display at Arien Appliances, John Street, Rochdale, OL16 2HP which will display multiple static advertisements on rotation.

The proposed panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m(d) and will be positioned 2m above ground. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the erection of a D-Poster can be achieved at a similar speed to a traditional display, with minimal structural work. The quality of the image produced will mimic that of a traditional poster and paste display (**Appendix 1**).

The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format, which will see an overall reduction in adverts, as multiple advertising campaigns can be supported by single panels. This will result in the consolidation of "multi-panel" sites into single panels. As can be seen in Figure 1 there has been an overall reduction in the volume of advertising panels over an extended period of time, even though the number of digital sites is increasing.

At present, there are over 1,300 digital 48-sheet advertisements across the UK, which is up from just 45 in 2015. However, over the same period the number of poster and paste 48 sheets has more than halved, from 18,519 to 8,910. This is a total reduction of 8,335 panels Nationwide, demonstrating a clear pattern of rationalisation and decluttering associated with digital upgrades. Since this project began Wildstone has obtained consent for over 700 consents for digital advertisements across the UK.

Classic & Digital Roadside 48 sheets: 2015-2022

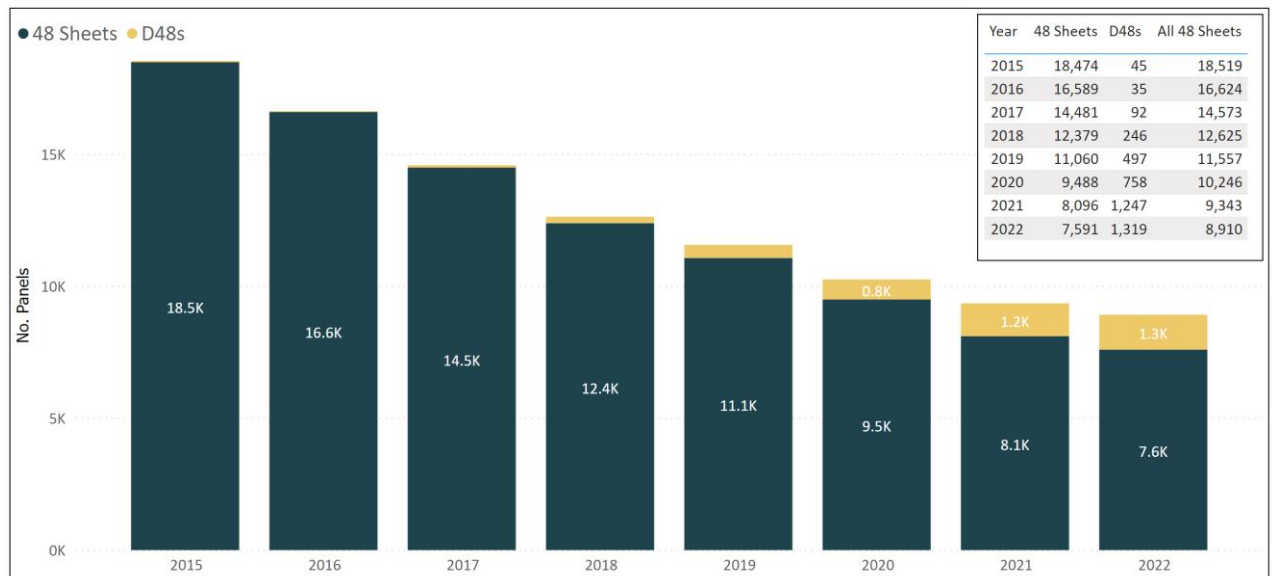


Figure 1 - Reduction in 48 sheet advertising 2015-2022

As well as removing clutter, this consolidation has additional benefits, such as the reduction in vehicle trips to repost adverts every two weeks, as this can now be done remotely.

An application was recently submitted for a similar proposal on the northern boundary the Site (ref: 24/00936/ADV). As of the date of submission, this application had yet to be determined.

Conditions

All advertisements are subject to the five standard conditions set out in the Regulations. The vast majority of digital advertisement consents now also operate within an established set of parameters that include controls over the level of luminance and the proposed speed and rate of change between adverts. These “industry standard” conditions have evolved over time, in order to address common concerns relating to amenity and public safety.

Wildstone and the industry body “Outsmart” have been working to establish best practice for the control of displays both at night and during the day. The D-Poster displays operate with a system of threshold controls, timers and light sensors to ensure that the luminance never exceeds the ILP guideline figure at night time, with lower thresholds set on more sensitive sites. Example sites operating in accordance with ILP Guidance during different times of the day are included at **Appendix 2** for information.

Newly published guidelines by the Institute of Lighting Professionals (ILP) have introduced a new set of model conditions which can be applied to advertisement consents going forwards. The model conditions are set out within Appendix 1 of Technical Note 5 “The Brightness of Illuminated Advertisements including Digital Displays” (PLG05/23) and are included within **Appendix 3** of this statement for clarity.

The Site

The proposal site is located at Arien Appliances, John Street, Rochdale, OL16 2HP. The site surroundings are predominantly commercial and residential in character.

The closest residential properties are located approximately 40m south west of the site and view the site at an oblique angle.

The site is located within the Town Head Conservation Area. The Grade II listed Town Head House Department of Social Services, Town Head Offices is located approximately 90m north west of the site and views the site at an oblique angle. The Grade II listed 170, 172 and 174 Yorkshire Street are located approximately 80m north of the site and view the site at an oblique angle. The Policies Map shows that the site is located within a Mixed Employment Zone showing the commercial character of the surrounding area.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the proposal would be classified as within Environmental Zone 3 (Suburban).

The site is in a location where advertising of this type would typically be found, demonstrated by the numerous smaller displays within the vicinity of the site and the digital displays with identical dimensions to the proposed display located approximately 8.5km south of the site at Land Adjacent Middleton Trade Park, Junction of Oldham Road and Manchester New Road, Middleton. The displays were granted under 22/00919/ADV on 9th December 2022 and the Officer's Report confirms that the displays would not have an adverse effect on highways and visual amenity.

Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the "Regulations"). Regulation 3 states that advertising should be controlled in the interest of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The National Planning Policy Framework 2023 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 141 of the National Planning Policy Framework (NPPF) advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts. As described in the National Planning Practice Guidance (NPPG) the regime is a "lighter touch" than the system for obtaining planning permission for development. The NPPG also clarifies that a local plan does not have to contain advertisement policies and that if such policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

The Development Plan for the area consists of the Rochdale Core Strategy (adopted 2016). The Council does not have any specific policies in relation to advertising.

Planning Considerations

The proposal seeks to erect a digital 48 sheet advert at Arien Appliances, John Street, Rochdale, OL16 2HP.

The proposed location is considered to be appropriate in principle for advertising and the impact of the proposal has been considered in amenity and public safety terms as follows:

Amenity

The commercial context of the surroundings, nearby examples of smaller adverts and the display granted under 22/00919/ADV establishes the site as appropriate for an illuminated advert of this type. The proposal site is in a well-lit area with street lights and lights coming from the commercial buildings within the vicinity of the site. As such, it is considered that the proposed display will not cause an adverse impact on the visual amenity of the area.

An application was recently submitted for a similar proposal on the northern boundary the Site (ref: 24/00936/ADV). As of the date of submission, this application had yet to be determined.

The closest residential properties are located approximately 40m south west of the site and view the site at an oblique angle.

The site is located within the Town Head Conservation Area. The Grade II listed Town Head House Department of Social Services, Town Head Offices is located approximately 90m north west of the site and views the site at an oblique angle. The Grade II listed 170, 172 and 174 Yorkshire Street are located approximately 80m north of the site and view the site at an oblique angle. Due to the distance between the display and the Grade II listed buildings and the commercial surroundings it is considered that the display will not have an adverse impact on the listed buildings. Historic England's Historic Environment Good Practice Advice in Planning: 3 (March 2015) guidance was produced on behalf of the Historic Environment Forum to provide information on good practice, reinforces the well-established concept that some views can contribute more to understanding the significance of a heritage asset than others. This is because the appreciation of relationships between the asset and elements in the view may be particularly relevant. That is almost inevitably the case where there are intentional sight lines or inter-visibility between heritage assets, or between heritage assets and natural features. Such views are part of the design of the asset and can therefore make a particularly important contribution to its significance. Conversely however, there may be a multitude of 'incidental' views which do not make a particular contribution to an asset's significance – or indeed not at all in some instances, where they may be described as detracting features. In this case the relative value, or contribution, of the existing situation is a critical factor to be taken into account. That is to say, a change proposed to an aspect of the heritage asset's setting that is plainly of little or no value, and that makes little or no material contribution to its significance, would not affect its significance in the same way as, for example, an aspect of its setting that does make a positive contribution to or reinforce their significance.

Brightness would be 300 cd/sqm from dusk to dawn and up to 5,000 cd/sqm at all other times dependent on time of day/year and ambient conditions, in line with ILP Guidance.

The reduction in night time luminance will further mitigate any potential impacts at night and ensure that the display is not dominant.

Public Safety

Digital advertising is now a common feature in town centres and adjacent to major roads across the Country. There are now over 1,300 digital 48 sheets in the UK, operating without issue in a wide variety of roadside environments.

Digital advertising is now a common feature in town centres and adjacent to major roads across the Country and there remains no causal evidence that they cause traffic collisions. Nevertheless, it is an accepted fact that advertisements are intended to attract attention. As such they are best located in situations where demands on a driver are low and they do not conflict or confuse with other traffic signs or signals.

Over the past decade an industry standard set of conditions has been established to control their use and minimise the potential for driver distraction. The proposal will operate within these conditions, thereby limiting the potential for distraction.

The proposal site is located at the long approach of a junction, where traffic would typically slow down and drivers would therefore be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements. The proposal will be visible in long views on the approach and as such will allow drivers time to assimilate as part of the surround environment.

There is no evidence to suggest that a static digital advertisement display is any more distracting than a paper and paste advert. Whilst acknowledging the site is not within London, The Transport for London 'Guidance for Digital Roadside Advertising and Proposed Best Practice' (March 2013) is still considered relevant and

concludes, “*with appropriate controls, digital advertising should be no more or less acceptable than traditional forms of advertising (i.e. backlight, poster and paste, vinyl etc)*”. Whilst the proposals are not directly replacing an existing advertisement, the Site is located within an area where advertisements are common and an existing part of the street scene. A standard range of conditions have been developed and utilised nationwide to limit the level of illumination and the frequency and method of change of adverts to ensure that the display does not cause glare or become an unacceptable distraction to drivers. In addition, there will be no moving images or flashing lights displayed. Furthermore, this project seeks to control the levels of illumination to accurately match the same levels as illuminated paper and paste displays to ensure no change in impact as a result of the upgrade.

It is proposed to limit the rate and speed of change of adverts to ensure that the displays do not cause glare or become an unacceptable distraction to drivers. In addition, there will be no moving images or flashing lights displayed in accordance with the digital roadside code. The change between adverts will be instantaneous which will ensure that any potential distraction of drivers will be minimised. The proposed changeover rate of 10 seconds will ensure compliance with the Transport for London guidance.

Furthermore, according to crashmap.co.uk there have been no accidents on the approach to the site in the past 5 years indicating a very safe stretch of road.

Benefits of Digital Advertising

The attractiveness of digital advertising to an infrastructure provider is that it allows the advertising network to be better managed, monitored and maintained. For operators the inherent flexibility allows smarter real time campaigns and better control over sales. These factors manifest in wider public benefits as summarised below:

- High quality and robust designs;
- Tidy and well maintained sites and bio-diversity net gain where the site allows;
- Uplift in business rates to spend on public services;
- Reduction in vehicle trips and associated noise, air quality and climate considerations;
- Removal of multiple advertising sites and panels and reduction in clutter;
- Reduction in waste involved in the poster production process;
- Greater flexibility to enable better access to advertising displays for local businesses;
- Platforms to broadcast emergency messaging;
- Ability to use void periods for public messaging and public art campaigns; and
- Opportunity to integrate additional hardware to meet Smart City objectives.

These are benefits to development that will not be achieved by maintaining the status quo.

Conclusion

The proposal will be located in a commercial and residential area in a position where advertising of this type is commonplace. The proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no adverse impact on amenity or road safety.

For these reasons and the positive benefits set out, it is considered that the application should be granted consent.

Application Submission

In order to complete the application, please find attached the following documentation:

- Completed application forms
- Letter Statement (this letter);

- Architectural drawings including;
 - 22982-OS-PLANNING-FINAL-PDF (1) Site Location Plan
 - 22982-OS-PLANNING-FINAL-PDF (2) Existing Site Plan
 - 22982-OS-PLANNING-FINAL-PDF (3) Proposed Site Plan
 - 22982-OS-PLANNING-FINAL-PDF (4) Existing and Proposed Elevations

Additionally, we will arrange payment to the Council to cover the cost of the Advertisement Consent application.

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,



Max Goode

Associate Partner

For and on behalf of Carter Jonas LLP

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