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Rochdale Borough Council
Development Management
Number One Riverside
Smith Street
Rochdale
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23rd August 2022

Dear Sir/Madam,

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

REMOVAL AND CONVERSION OF POSTER ADVERTISEMENT DISPLAYS AT LAND TO THE SOUTH OF WATER STREET, ROCHDALE, OL16 1TL

Please find enclosed an application for advertisement consent to remove two of four existing externally illuminated 48 sheet paper and paste advertisement displays and upgrade of the remaining two 48 sheet advertising displays to a modern digital format capable of being operated from a central location without the need to visit each site individually.

This is part of an industry wide drive to modernise and upgrade advertising infrastructure to meet modern requirements. It is proposed to remove two of four existing 48 sheet paper and paste advertisement displays and upgrade of the remaining two 48 sheet advertising displays with lightweight digital posters of the same dimensions. The quality of the images produced will mimic that of a traditional poster, with the overall aim of the project being to replace like for like with no adverse impact on visual amenity or public safety.

The Applicant

Wildstone Securities 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.

This specialist landlord-tenant dynamic is symbolic of the maturity of the outdoor advertising sector as it becomes a legitimate property class attracting new investment and innovation. As the largest owner of advertising assets in the Country and landlord to all of the major operators, Wildstone are in a strong position to be able to push best practice and to change the perception of digital out of home (DOOH) advertising.

It is imperative, as part of this process, that there is confidence that digital displays can be appropriately controlled, and that there is a responsible party ensuring that conditions agreed at planning stage are met. Wildstone perform this function as they have a long-term investment in the sites regardless of who the tenant is.

Through partnership with the media operators as tenants, our in-house specialists, and screen maintenance and monitoring contractors, new systems of control have been established to help manage the operation of

the displays. Content is controlled remotely in real time from a Networks Operation Centre (NOC) and the sites are monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software reports any faults back to the NOC and a kill switch turns the content to black until it can be resolved.

Wildstone has also invested in hardware through the development of the “D-Poster” which offers a high level of control over brightness, enabling it to mimic a traditional 48 sheet poster during the day and in the evening to ensure that it is muted and appropriately lit.

The Proposal

The proposal seeks to consolidate the total area of existing signage on site by 50%, reducing the four existing 48 sheets adverts to just two 48 sheet adverts. The proposals will also upgrade the remaining existing displays which will display multiple static advertisements on rotation. The two adverts which sit further to the west of Water Street are to be upgraded whilst the two adverts that sit further to the east of Water Street are to be removed.

The proposal will have the same dimensions as the existing 48-sheet panels, measuring 6m (w), x 3m (h) x 0.061m (d). It will be positioned at the same height (2.80m) from ground level however the surrounding maintenance deck frame will be removed from both adverts, further reducing street clutter from the site. The new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the re-posting of a D-Poster can be achieved at a similar speed to traditional posting, with minimal structural work and the existing 150mm frames repaired or replaced and painted black. The quality of the image produced will mimic that of a traditional poster, as illustrated at Appendix 1.

The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format. It should be noted that not only will there be a reduction in the number of adverts on this site but this will see an overall reduction in adverts as multiple advertising campaigns can be supported by single panels. This will see the end of sites comprising a number of competing adverts all displaying different campaigns.

At present, there are 1,319 digital 48-sheet advertisements in 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 over 700 consents have been granted for digital advertisements across the UK.

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:

- Upgrade of sites lacking in investment and uplift in business rates;
 - 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 campaigns (i.e. Covid-19 Government messaging);
- and

- Opportunity to integrate additional hardware to meet Smart City objectives.

Conditions

As described earlier, it is imperative that digital displays are appropriately controlled to ensure that they are acceptable in amenity and public safety terms. Outsmart, the advertising industry body (formerly the Outdoor Media Centre) has sought to self-regulate by introducing a code of practice that restricts the operation of digital displays adjacent to the highway to static images only, on a rotation of an advert every ten seconds, with a rapid change between images. The ILP Guidelines have also been widely adopted as a means of controlling the night time luminance of advertisements. This industry standard forms the basis for conditions applied to the majority of digital advertisement consents.

Wildstone and Outsmart continue to work closely with the Institute of Lighting Professionals to establish best practice guidance on the use of digital displays at night time and during the day. A new ILP guide is currently being prepared.

In accordance with the current best practice approach, 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.

During the daytime the screen is able to adjust according to changes in the ambient light, ensuring that the brightness decreases in low light conditions.

The following conditions are proposed for this site:

- The intensity of the illumination of the sign permitted by this consent shall be no greater than 300cd/m² in the hours of darkness. During the daylight hours the luminance shall be controlled by sensors and/or timers to reflect ambient light conditions. At all times the display shall operate within that recommended by the Institution of Lighting Professionals in its Professional Lighting Guide 05 (PLG 05) Brightness of Illuminated Advertisements (or its equivalent in a replacement guide).
Reason: In the interests of amenity and in order to retain effective planning control.
- The minimum display time for each advertisement shall be no less than 10 seconds.
Reason: In accordance with industry code of practice and in the interests of amenity and public safety in order to retain effective planning control.
- Changes between advertisements to take place instantly with fade effect and no other sequencing, fading, swiping or merging effects.
Reason: In the interests of amenity and public safety in order to retain effective planning control.
- No individual advertisement displayed shall at any time contain moving images, animation, intermittent or full motion video images, audio, directional symbols or any images that resemble road signs or traffic signals.
Reason: In the interests of amenity and public safety in order to retain effective planning control.
- The advertisement display shall at all times contain a feature that will turn the display off (showing a black/blank screen) in the event of malfunction or error.
Reason: In the interests of amenity and public safety in order to retain effective planning control.

Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant. However, it would be expected that the Local Planning Authority present evidence-based justification for deviating from the standard approach as any planning conditions imposed must meet the six tests as set out in National Planning Policy Guidance (NPPG).

The Site

The proposal site supports four 48-sheet externally illuminated paper and paste billboards. The site is located on a grassed bank at land on the southern side of Water Street and to the north of Robinson Street. As stated above, the site comprises two adverts further to the western end of Water Street with the two further adverts approximately 26m to the east of this. The adverts are freestanding, with two facing east along Water Street and two facing west along the same road.

The surrounding area is almost wholly commercial in character. Commercial uses are situated directly opposite the site to the north, east and west. The adverts also overlook onto hardstanding areas used for car parking in both easterly and westerly directions. There are no residential uses in close proximity of the site. The site is located on land allocated for the Kingsway Business Park (EC/7 of the UDP (2001-2016).

The site does is not situated within a Conservation Area. The nearest listed building is the Grade II Waterside House which is situated on the opposite side of Water Street and is some 35m to the west however there will be no impact on the setting of the building.

The proposal site is an established location for advertising, having supported traditional paper and paste advertisements for at least 14 since July 2008. The advertisements have not been removed during this period nor has the format of the advertisements changed. Therefore, the signage benefits from deemed consent under Class 13(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Similar advertisements applications have been approved in close proximity to the site:

- Ref: 17/00748/ADV or APP/P4225/Z/17/3187607: Replacement of existing 2no. 48 sheet advertising displays with 2no. digital LED advertisements- this site is located 170m to the east of the application site at 118 Molesworth street. Following refusal by the Council, the application was allowed at appeal on both highways and amenity grounds.
- Ref: 21/00057/ADV: Replacement of freestanding advertising hoarding with freestanding LED advertising unit- this site is located approximately 160m to the east at the junction of Molesworth Street and Robinson Street. The application was approved by the Council.

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 2021 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 136 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.

Planning Considerations

The proposal will cumulatively decrease the number of adverts on the site, in the area and overall, the project will see a reduction in the number of advertising sites. The removal of two displays, the digital upgrade of the other displays and the control over operation seeks to ensure that the change in the visual impact of the site on the surroundings is positive. Nevertheless, it is acknowledged by the applicant that the change from the existing advertisement on site in the type of illumination and the potential to increase the rate of change of the adverts would require express advertisement consent. The impact of these alterations have been considered in amenity and public safety terms as follows:

Amenity

As the proposal seeks to “repost” the existing adverts that are not proposed to be removed, there will be minimal impact on the visual amenity during the daytime. In fact, the reduction in advertising area will have a positive impact. At night, the night-time illumination settings will ensure that the level of illumination is appropriate to the local area and is equivalent to a traditional externally illuminated advert, with a more even light spread.

The character and setting of the site, street scene and surrounding area is primarily commercial. It is in such areas that national guidance and advice advocates locating advertisements; here, any impacts are appreciably less and commensurate to the commercial and industrial surroundings. In this regard, the proposal should be considered acceptable.

The side by side comparison photograph on the D-Poster information sheet (Appendix 1) helps to illustrate the minimal difference between the existing type of display and the proposed replacement once controls are put in place, which ensure that a digital advertisement is not over illuminated.

The controls proposed over the level of luminance at night are in line with the ILP Guidelines and industry best practice and will ensure that the proposed displays do not cause any material harm to amenity. The context of the surroundings, including the main road location, surrounding street lighting and commercial uses establish the site as appropriate for illuminated adverts of this type. Additional controls over the displays will be considered if necessary to remedy a specific amenity concern.

Given the commercial nature of the site and the surrounding area and the reduction in advertisement displays on site there would be a positive change to the appearance of the street scene. The removal of two 48 sheet panels would reduce street scene ‘clutter’ and would sit comfortably in its visual context improving the amenity, the qualities of the site, the character, and appearance of the wider area.

Statistics demonstrate how commonplace and well established D48 displays have become across the country.

Public Safety

When assessing public safety, the key considerations are whether the location is appropriate (i.e. undemanding on the driver) and whether the level of illumination and the sequential change between advertisements is controlled to prevent distraction from the driving task. As the principle of an advertisement has already been established at this location, the Council must only consider whether the proposed controls are sufficient to ensure that there is no additional distraction which would cause an unacceptable impact on highway safety. Should the Council's Highways department identify any reasons why the location might be challenging to drivers, the applicant would be open to discussing alternative controls. However, it should be noted that the proposed conditions are now well established as best practice and as such any change (e.g. to the rate of change) would need to be evidence based and be specific to the location.

The proposal site is in an uncomplicated location which drivers should be able to navigate with ease. The display would occupy a similar setback position as the existing unit, ensuring that site lines and visibility splays are maintained. It would be seen by traffic travelling east and west along Water Street which is well lit, straight,

level, and has excellent forward visibility. Highway users would therefore be fully capable of glancing far in advance of the site without being distracted from the road or traffic conditions ahead. As such, drivers would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Under these circumstances, the advertisement would not constitute a hazardous distraction to the surrounding highway network to anyone exercising a reasonable standard of care. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent.

Conclusion

The proposal is in a location where an advertisement has been previously established for at least 14 years. The proposal seeks to consolidate the number of existing advertisement displays and in turn there will be a 50% reduction in the area of advertising at the site and upgrade the existing 48 sheet advertising displays to a modern digital format. Although material changes are proposed, these changes will be beneficial to the character and appearance of the site and wider area. The proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no additional harm to amenity or road safety.

For these reasons and the positive benefits set out above, 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 prepared by Carter Jonas;
- Letter Statement prepared by Carter Jonas (this letter);
- Appendix 1- D Poster
- Architectural drawings;
 - PA 01 Site Location Plan
 - PA 02 Existing Site Plan
 - PA 03 Proposed Site Plan
 - PA 04 Existing and Proposed Elevations
 - PA 05 Existing and Proposed Elevations
 - PA 06 Existing and Proposed Elevations
 - PA 07 Existing and Proposed Elevations

Additionally, we will arrange payment to Rochdale Borough 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,



Jenna Murray
Associate

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