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PLANNING  
CONSULTANTS

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**WILDSTONE ESTATES LTD  
REPLACEMENT OF PAPER AND PASTE ADVERTISEMENT DISPLAY BOARD WITH DIGITAL  
ADVERTISEMENT DISPLAY BOARD  
HALIFAX ROAD, ROCHDALE, OL12 9AA  
PORTAL REFERENCE: PP- 14060312**

Dear Sir/Madam

Please find enclosed an application for advertisement consent for the conversion of two existing 48-sheet display hoardings into one internally illuminated digital D48 display, to be placed along Halifax Road. The site currently hosts two back-to-back traditional paper and paste displays which will be removed to allow for the installation of a single sided modern digital poster, capable of being operated from a central location and significantly reducing vehicle trips for reposting.

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 displays 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 nighttime.

As landowner, 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 convert two existing paper and paste hoardings placed 'back-to-back' with a modern single-sided internally illuminated digital advertisement (D-Poster) along Halifax Road, visible only to those travelling southwest, which will display multiple static advertisements on rotation. The site currently hosts two traditional double sided 48-sheet displays that have been in place since at least October 2008 with no known issues. The advertisement boards have been displayed continuously for over ten years, making them immune from enforcement under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. 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 (i.e. six adverts per minute). The ability to carry multiple adverts will cater for the demand in this area and reduce the pressure for new locations.

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 advertisements, 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 gained consent for over 700 digital advertisements across the UK.

## Classic & Digital Roadside 48 sheets: 2015-2022

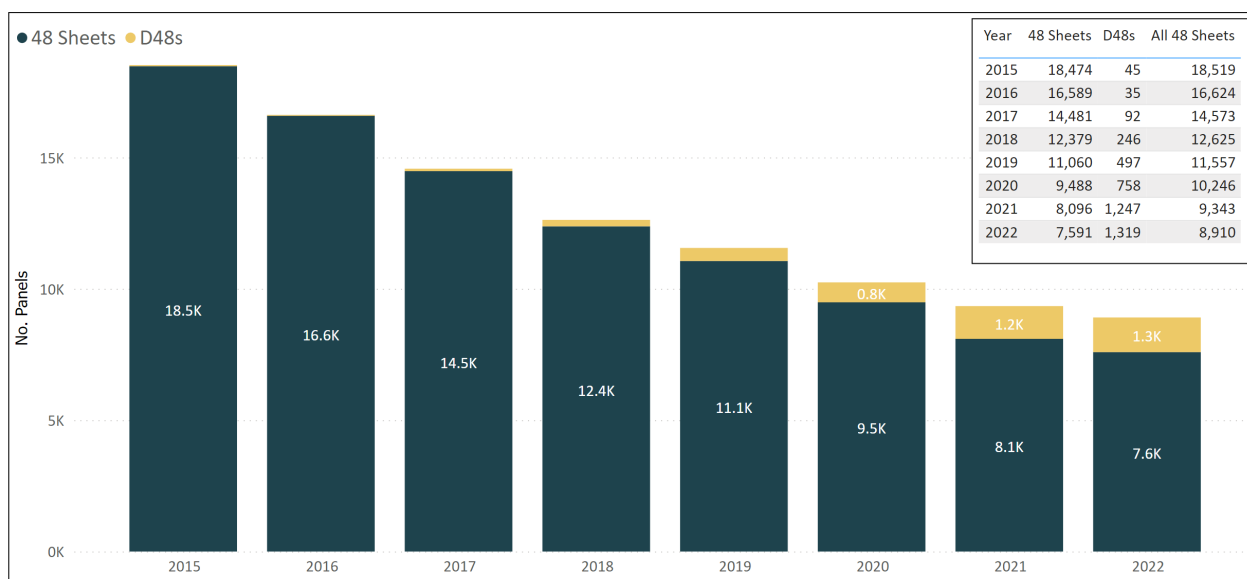


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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.

### The Site

The site is located along Halifax Road, at the turning onto Bridge Street. The immediate surrounding area is predominantly residential in nature, with a few commercial units along Halifax Road, running northeast to southwest. Residential properties span in all directions, with the exception of Greenkettle Fibre Glass Services warehouse beyond the residential properties to the southeast, and grade II listed Saint John Baptist Church to the east.

The proposed site is an established location for advertising, having supported the existing posterboards since at least 2008. Additionally, there is already a digital advertisement board in place along Halifax Road 30m northeast of the site. This board is aimed at those travelling in the opposite direction, northeast, consented December 2021 (ref: 21/01442/ADV). Similar to the current proposal, that display replaced 2 x 48sheet posterboards, albeit those were in a side-by-side arrangement rather than back-to-back.

The site is not located within or in the setting of a conservation area. The site is located in a flood zone 2 area, as well as being 80m from grade II listed Saint John Baptist Church. The proposal seeks to replace existing back-to-back advertisement boards, therefore requiring no additional structures and as a result it will not increase the risk of flooding. Indeed, there will be one less structure since the southern poster display will be removed entirely. The listed building is not viewed in the setting of the proposal, with the previously consented digital advertisement board (ref: 21/01442/ADV) being located closer and subsequently granted consent without issue.

## 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 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 have been used as the basis for the proposed conditions set out in **Appendix 3** of this statement.

## Planning Policy

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 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 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 development plan for the area consists of the Rochdale Local Plan Core Strategy 2016-2026, adopted October 2016. This document contains Policy E1 which supports sustainable development, and Policy P3 which focuses on high-quality design and the enhancement of the public realm. Furthermore, the Rochdale Public Realm Strategy SPD highlights the council's commitment to promoting a high-quality public realm and reducing clutter with reference to advertising, therefore supporting the use of modern digital boards for more targeted and responsible advertising.

The Rochdale Borough's Strategy for Flood Risk Management 2013-2023 outlines the council's approach to managing flood risk. It emphasises the importance of ensuring that new developments are well-located and contribute to reducing flood risk. Developers must consider flood risk assessments and incorporate sustainable drainage systems (SuDS) to mitigate potential flooding impacts.

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires local authorities to preserve and enhance the character and appearance of listed buildings and conservation areas. The Rochdale Local Plan includes policies to protect historic buildings and their settings, ensuring that any new development near listed buildings does not adversely affect their significance.

## Planning Considerations

The proposal seeks to replace two existing 48-sheet advertisement boards with a new digital display along Halifax Road. The impact of the proposal has been considered in amenity and public safety terms.

### Amenity

The proposed signage will be situated in an established location for an advertisement, with the current billboards remaining in place for over ten years without issue. The new poster will appear the same as a paper and paste display during the day as illumination. Digital advertisements are commonly found in settings that are similar to the site for the proposed poster. The recently erected digital display just north of the application site demonstrates how the displays look in practice.

The illumination of the D-Poster is controlled by sensors that gauge the ambient conditions which ensures that the poster does not appear overly bright. **Appendix 1** presents a side-by-side view of how a digital display appears with appropriate controls in place. The advertisement is entirely capable of adjusting brightness levels throughout the day to match the ambient conditions of the daytime. Examples of different lighting conditions that can occur throughout the day can be found in **Appendix 2**.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum night-time luminance of the display should be set at 300cd/m<sup>2</sup>. Application 21/01442/ADV, just to the north of the site, similarly has a limit of 300cd/m<sup>2</sup> during the “hours of darkness” (condition 6). During the night the illumination of the display will be limited as mentioned above to ensure that the difference is minimised and acceptable within this location. These controls are entirely appropriate for the immediate setting but should the local planning authority consider that a different level of illumination would be appropriate, we would be happy to discuss during the course of the application.

We note that the consent for 21/01442/ADV also has a limit on daytime illumination of 600cd/m<sup>2</sup>. However, this would not be acceptable to the applicant in this case since digital screens such as these can, in extremely bright daylight conditions, reach a maximum of 5,000cd/m<sup>2</sup>. That level would only be reached with a theoretical full-white display in the brightest possible daylight conditions. The ILP guidance notes, at paragraph 5.3, that:

*“A daytime limit of 600cd/m<sup>2</sup>, while adequate for twilight, dawn, dusk and very overcast conditions when ambient light levels are low, does not allow for higher ambient conditions as found on bright days with cloud cover, bright sunny days or in direct sunlight conditions. As a daytime limit it is therefore unnecessary and unreasonable, thereby at odds with the six tests for planning conditions as set out in the National Planning Policy Framework. The recommended daylight operation performance should be broadly in line with Table 10.5 of this guide”.*

Table 10.5 of the guidance states that, for direct sunlight, a limit of 5,000cd/m<sup>2</sup> is appropriate. In all other lighting conditions (eg, partial cloud, full cloud, etc), the sensor in the display will dim the

luminance level in order to save energy. It is therefore in the operator's interest that the level of illumination adjusts to that it is only ever as bright as it needs to be. The applicant would accept a planning condition that requires the installation of a light sensor to adjust luminance as a reaction to ambient lighting conditions.

Considering the nature of the site as well as the presence of other illuminations, such as the street lighting and other illuminated signage in the immediate context, there would very little material change in the appearance and character of the immediate area as a result of the digitisation of one of the advertisements.

There are no conservations areas within a close proximity to the site. There is a grade II listed building 80m from the site, but it is not viewed in the setting of the proposal. Owing to the proposal being for a 50% reduction in the amount of advertising space at the site, and the fact that the panel being removed currently faces the entrance to a residential road, there is a clear benefit to amenity, not just to the residents of that road, but to northbound travellers on Halifax Road.

### 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 only material change will be the introduction of illumination. The Council should only consider whether the proposed D-Poster controls are sufficient to ensure that there is no additional distraction which would cause an unacceptable impact on highway safety. The factor of illumination has been proven not to be an issue with the successful implementation of the digital advertisement board further along Halifax Road (ref: 21/01442/ADV)

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. 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.

The proposed D-Poster will operate within the conditions as set out in **Appendix 3**. Over the past decade, these industry standard conditions have been established to control the use of digital screens and minimise the potential for driver distraction. 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. Owing to the proposed advertisement being of the same size, the potential for distraction is the same compared to the existing 48-sheet poster which can carry more messages at once. Overall, the proposed display will not adversely affect public safety. On the contrary, the removal of the south-facing poster board has the potential to improve public safety for users of Halifax Road.

The proposed display will occupy a similar position to that of the north-facing sign currently situated there, along Halifax Road, appropriately set back in order to maintain site lines and visibility of traffic signage. The sign will be primarily viewed by those who are travelling southwest along Halifax Road, which is a well-lit straight piece of road with good visibility ahead. Drivers would be entirely capable of

glancing at the advertisement whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Owing to the above, the proposed digital screen **would** not constitute a hazardous distraction to anyone exercising a reasonable standard of care while driving on the adjacent highway. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent.

### **Application Submission**

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

Completed application forms

- Letter Statement (this letter);
- Appendix 1 – Side by Side Examples
- Appendix 2 – Lighting Conditions
- Appendix 3 – Model Conditions
- Architectural drawings including;
  - Site Location Plan (ref: 11667/PA/01)
  - Existing Site Plan (ref: 11667/PA/02)
  - Proposed Site Plan (ref: 11667/PA/03)
  - Existing/Proposed Elevations Front (ref: 11667/PA/04)
  - Existing/Proposed Elevations Back (ref: 11667/PA/05)

Yours faithfully,



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