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17th April 2024

Dear Sir / Madam

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

388 MANCHESTER ROAD, TAMESIDE, M34 5RP: CONVERSION OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER

Please find enclosed an application for advertisement consent to upgrade a long established paper and paste advertising display to a modern digital format, 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 night time.

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 Proposed Development

The proposal seeks to replace a longstanding poster display at 388 Manchester Road, Tameside, M34 5RP with a freestanding digital poster display (D-poster) which will display multiple static advertisements on rotation.

The proposal Site has been in situ for over ten years, since at least July 2008. As such, the Site is an established location for advertising.

The proposed panel has the same dimensions as a standard 48-sheet hoarding (and the existing display), measuring 6m(w) x 3m(h) x 0.1m(d) and will be positioned 2m above ground, which is slightly higher than the existing display. 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 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 gained consent for over 700 digital advertisements across the UK

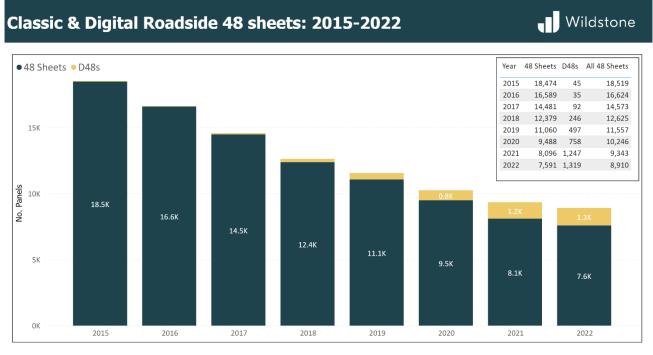


Figure 1 - Reduction in 48 sheet advertising 2015-2022

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.

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.

The Site

The proposal Site is located at 388 Manchester Road, Tameside, M34 5RP. The Site surroundings are predominantly commercial and residential in character. The Site is located on the approach of the A635 Manchester Road and A6140 junction.

The proposal site is an established location for advertising, having supported an advertisement on site since at least July 2008. The existing display was previously externally illuminated, but this illumination appears to have been removed around October 2014.

The closest residential properties approximately 50m to the north of the Site at Windsor Drive and have no view of the Site.

The Site is not within a conservation area. The Grade II listed milestone is located approximately 72m south east from the Site, which views the Site at an oblique angle.

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, and this is demonstrated by the existing display, the numerous other advertising displays within the vicinity of the Site, and the digital display with identical dimensions to the proposed display located approximately 2km south west of the Site at 10-12 Oldham Road, Ashton-Under-Lyne. The display at 10-12 Oldham Road was granted under 20/00782/ADV and demonstrates how digital displays would look once erected.



Figure 2 – digital advertising display at 10-12 Oldham Road, Ashton-Under-Lyne

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 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 development Plan for the area consists of the Tameside Unitary Development Plan (2004). The Council does not have any specific policies in relation to advertising.

Planning Considerations

The proposal seeks to replace the existing paper and paste display at 388 Manchester Road, Tameside, M34 5RP with a digital display.

The proposal will change the position of the display by slightly increasing the height from the ground. The dimensions of the proposed display will remain the same as the existing display. The change in the visual impact of the Site on the surroundings is not material. The impact of the proposal has been considered in amenity and public safety as follows:

Amenity

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 appropriate controls are put in place, which ensure that a digital advertisement is not over illuminated. Depending on how the screen is illuminated it can be muted or appear more vibrant in locations where that might be more appropriate.

The commercial context of the surroundings and nearby examples of similar adverts establishes the site as appropriate for an illuminated advert of this type, including the display at 10-12 Oldham Road. Given the nature of the site and surrounding area, the similarities between the existing and proposed display, there would be little, if any, material change in the appearance of the street scene.

The Grade II listed milestone is located approximately 72m south east from the Site, which views the Site at an oblique angle. The setting of these heritage assets features commercial developments within the vicinity of the assets, which means that the proposed display would not appear out of place in this location. 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 wellestablished 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 intervisibility 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.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum nighttime luminance of the display should be set at 300cd/m2.

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 at 388 Manchester Road 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.

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 association 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 Site has been in situ for over ten years, as such the Site is an established location for advertising. The established acceptability of the advertisement should not change materially with its conversion to digital subject to appropriate planning conditions to control the operation including the level of luminance of the digital display in the interests of amenity or road safety.

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;
 - o 951-OS-PLANNING-FINAL-PDF (1) Site Location Plan
 - o 951-OS-PLANNING-FINAL-PDF (2) Existing Site Plan
 - o 951-OS-PLANNING-FINAL-PDF (3) Proposed Site Plan
 - o 951-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.



APPENDIX 1 - D-POSTER EXAMPLE

D-POSTER

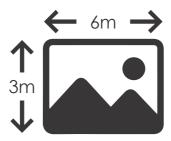




High resolution LED display



Dimmable to 55 cd/m² Embedded ambient light sensors to control brightness



Sized to match existing poster panels



Reduced depth of 60mm compared to traditional digital panel (300-600mm)

APPENDIX 2 - EXAMPLE SITES OPERATING IN ACCORDANCE WITH ILP GUIDANCE DURING DIFFERENT TIMES OF THE DAY











Model Conditions

The following model conditions are as set out in Appendix 1 of the Institute of Lighting Professionals (ILP) Technical Note 5 "The Brightness of Illuminated Advertisements including Digital Displays" (PLG05/23).

The model conditions include the standard conditions set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [The Regulations].

The first condition relates to the standard time period of a consent, which unless otherwise specified should be five years, as set out on Part 3 of The Regulations. Please note, following the expiry of the time period an application would benefit from Deemed consent under Class 14 Schedule 3 of the Regulations. As set out in National Planning Practice Guidance (NPPG), conditions cannot be used to prevent the operation of Class 14 unless supported by specific and relevant planning considerations.

The second condition seeks to ensure that the application is implemented in accordance with the approved plans and application documents.

Conditions 3 to 7 represent the five "standard conditions" attached to all applications for advertisement consent, set out in Schedule 2 of the Regulations.

Conditions 7 to 13 are commonly applied to digital consents and have been standardised by ILP with reference to the updated guidance document.

These conditions can be adapted to suite the application proposal, with additional conditions added where they pass the standard tests set out in the National Planning Policy Framework (NPPF).

Time Period

1. The consent now granted is limited to a period of five years from the date hereof.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Application Documents

2. The development shall be undertaken in strict accordance with the approved documents for this Advertisement Consent which comprise:

[List application docs and drawings]

Reason: To define the permission and for the avoidance of doubt and in the interest of proper planning procedures.

Standard Conditions

3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of

Advertisements) (England) Regulations 2007.

- 4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.
 - Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
- 5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.
 - Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
- 6. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.
 - Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
- 7. No advertisement shall be sited or displayed so as to:
 - a) Endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military).
 - b) Obscure, or hinder the ready interpretation of, any traffic sign, railway signal, or aid to navigation by water or air.
 - c) Hinder the operation of any device used for the purpose of security, or surveillance, or for measuring the speed of any vehicle.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Digital consents

- 8. There shall be no moving images, animation, video or full motion images displayed unless otherwise permitted by this consent.
 - Reason: In the interests of amenity and in order to retain effective planning control.
- 9. In the hours of darkness, the advertisement display luminance shall be no greater than 300cd/m2 in accordance with the recommended maximum night time luminance value set out for Environmental Zone 3 in Table 10.4 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m2.
 - Reason: In the interests of amenity, public safety and in order to retain effective planning control.
- 10. In daylight hours, the advertisement display luminance shall be controlled in order to

reflect ambient light conditions (to ensure it is neither too bright or too dull), and shall at all times be no greater than the recommended maximum daytime luminance values set out in Table 10.5 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m2.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

11. Unless otherwise permitted, the minimum display time for each advertisement shall be 10 seconds and the advertisement shall not include any features which would result in interactive messages / advertisements being displayed.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

12. The interval between successive advertisements shall be no greater than 1 second and the complete display shall change without effect. The display to include a mechanism to default to a blank or black screen in the event of malfunction, or if the advertisement is not in use.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

13. No images displayed shall resemble official road traffic signs, traffic lights or traffic matrix signs.

Reason: In the interests of amenity and in order to retain effective planning control.



Appendix 4

Application for Advertisement Consent: Proposal Factsheet

<u>URN:</u> 951

Site Name: 388 Manchester Road, Tameside, M34 5RP

Planning Portal Reference: PP-12966919

Advertising Type	Digital/Classic
Size of Advertisement (HxWxD)	3m (h) x 6m (w) x 0.1m (d)
Number of Panel	1
Max Daytime Illumination (to be adjusted based on application)	Up to 5,000 cd/sqm (Brightness will vary during daylight hours based on ambient brightness (ie brighter on a cloudless summers day than overcast winters day)
Max Night-time Illumination (to be adjusted based on application)	300cd/sqm
Notes	Brightness adjusted by a light sensor backed by a light table