

IW/GM/93456

5 May 2026



Bury Metropolitan Borough Council
Development Control,
The Planning Service,
3 Knowsley Place,
Bury,
BL9 0EJ

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007
PETROL FILLING STATION, MIDDLETON ROAD, PRESTWICH, MANCHESTER, M8 4LY
PROPOSED ERECTION OF A SMALL FORMAT D6 ADVERTISEMENT DISPLAY
PLANNING PORTAL REFERENCE: PP-14770242**

This letter has been prepared on behalf of Wildstone Estates Limited, an outdoor media infrastructure provider, and is submitted in support of an application for advertisement consent to erect one new freestanding D6 small format advertisement display at the above site.

The site comprises a Petrol Filling Station (PFS) owned by Motor Fuel Group (MFG), the largest independent forecourt operator in the UK. The Company currently has around 1,200 sites which offer customers a growing dual-fuel strategy, a versatile valeting offer and a convenient retail and 'food to go' portfolio. Wildstone Estates Limited is working in partnership with MFG to modernise existing advertising infrastructure across the MFG portfolio and where possible to rationalise as well as declutter existing advertisements, which aligns with an industry wide programme.

The Proposal

The proposal seeks to erect one freestanding D6 small format advertising display which will exhibit static advertisements on rotation. This is a standard small format advertisement, which is found across the UK in roadside, retail and transportation environments. There are over 75,000 6 sheets in the UK. The advertisements which is the subject of this application is primarily aimed at users of the PFS rather than road users.

The proposed D6 small format advertisement display has the same dimensions as standard 6-sheet hoarding, measuring 1.23m(w) x 2.4m(h) x 0.022m (d). The proposed advertisement will utilise LCD digital technology, which is durable, efficient and can be easily erected with minimal engineering. The quality of the image produced will mimic that of a traditional paper and paste display. The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. The advertisements will comprise local and national campaigns as well as goods and services sold on site.

The D6 small format advertisement display will be monitored and controlled remotely in real time from a Network Operation Centre (NOC) to display advertisements and facilitate responsive maintenance where necessary. Diagnostics software can report any small technical faults (e.g. a broken panel) so

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that a kill switch can turn the content to black. Engineers are able to respond within 24 hours to any issues which require attendance.

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.

The proposed display will 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.

Newly published guidelines by the Institute of Lighting Professionals (ILP) have introduced a new set of model conditions that 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 with this statement for clarity.

The Site

The proposal site is located within the wholly commercial entity of the PFS, and the D6 small format advertisement display will be positioned within that site boundary. The PFS is a service station located off Middleton Road (A576), within the Prestwich area of North Manchester. The site surroundings include the petrol station forecourt and a Londis convenience store. The immediate site surroundings can be seen in **Figure 1** below.

The site surroundings are principally commercial. The wider surroundings are residential, with the closest frontage being approximately 25m away. They are separated from the PFS by the A576 and a fence which is located adjacent to the PFS totem.

There are a number of illuminated elements around the advertisement site including the forecourt of the petrol station as well as some of the advertisements for the PFS and convenience store. Within the site are a mix of advertisements ranging from totem and fascia signage. These advertisements have been in place for many years without issue (imagery from google street view, confirms they have been established since at least September 2008), confirming that illuminated advertisements in the area do not detract from amenity or public safety.

Under the categorisations set out in the published ILP Guide PLG 05/23, the proposal would be classified as within Environmental Zone 4 (Urban). The closest residential window is approximately 25 metres to the east of the proposed sign location, this property would have a limited view of the proposal given the separation, screening of the fence and orientation of the proposed advertisement.

The site is not based within or near a conservation area or heritage assets.

Figure 1: View of the site

Source: Google Street View in September 2008

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 2024 (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 Site lies within the administrative boundary of Bury Metropolitan Borough Council, with the relevant development plan including the Joint Places for Everyone Development Plan (2024). There are no policies which refer to advertisements.

Planning Considerations

The proposed location is considered to be appropriate in principle for a new D6 small format advertisement display and in line with planning regulations, the impact of the proposal has been considered in amenity and public safety terms and are addressed in turn below:

Amenity

National Planning Practice Guidance confirms, in Paragraph 079, that *“In practice, “amenity” is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement...”*. In this case, the immediate neighbourhood is the petrol filling station itself since, in the context of the wider setting, the filling station structures (shop/canopy/pumps and other features) will remain by far the dominant visual attractor. It is a design requirement that petrol filling station forecourts must be “adequately illuminated” at all times, with a minimum design illuminance of 100 lux at ground level (Section 9.5.6, APEA Blue Book – 4th Edition, April 2018). Therefore, the context of the site is one of an already developed, well illuminated commercial operation. The effect on amenity of the new proposed D6 advertisement on this well-lit immediate area will therefore be minimal.

The surrounding advertisements and illuminated forecourt establishes the site as appropriate for a new illuminated display of this type. The proposed D6 advertisement is smaller in scale than the surrounding PFS infrastructure and the adjacent illuminated totem, as such the proposed advertisement will have a negligible impact on the surrounding environment given the scale in contrast to the totem sign. Furthermore, the proposed D6 advertisement will replace the four flags, a costa cup and two poster advertisements, and a pole mounted advertisement currently on site, ensuring that the overall number of advertisements decrease, reducing visual clutter at the PFS.

The advertisement display will have sensors within the panel that allow for the screen to be appropriately illuminated during the daytime. The position and location of the proposed small format D6 advertisement and the light-adjusting capabilities of the sign ensure that the digital panel will not adversely impact the amenity of the immediate or wider area. By day it will appear the same as paper-signs and by night it will be illuminated in the context of an also illuminated petrol filling station operation. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, it is recommended that the maximum nighttime luminance of the display should be set at 300cd/m². The reduction in night-time luminance owing to the site being within Environmental Zone 4 is entirely appropriate for the immediate area and will not generate any adverse impacts to visual amenity.

The properties within proximity would not have a direct line of sight towards the proposal given the orientation and positing behind the fence. It would therefore not impact the amenity of residents.

The small format D6 advertisement would not be detrimental in either an immediate or wider sense and would be appropriately located. The commercial setting of the PFS establishes the site as a suitable location for an illuminated advertisement of this type, and it would not harm the commercial character of the surrounding area.

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. The PFS is a well-established host of advertising relating to the business premises and products available. The proposed

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advertisement is intended to be viewed by users of the filling station whilst they are filling and charging their vehicle.

It should be noted that the proposed conditions are well established as best practice and as such any change (e.g. to the rate of change) would be unusual and would need to be evidence based to be specific to the location.

The advertisement, which would sit next to the much taller PFS totem sign, would only be directly visible to those travelling north on A576 and those within the PFS. The A576 is a straight and wide road with great forward visibility. Road users would be entirely capable of glancing at the advertisement whilst maintaining stopping distances and an awareness of surrounding traffic movements. Additionally, those entering and exiting the petrol station will do so at a reduced speed and therefore will be able to safely navigate the immediate surroundings of the advertisement site without issue.

It is not considered that the proposed display is so unusual or the road characteristics so complicated that the advertisement within the vicinity of the PFS would cause a public safety concern. The proposed panel would incorporate illumination levels which align with the ILP's Guidance and this intensity is considered wholly acceptable for the location. The panel would be viewed within the context of its surroundings, as a PFS, which is considered to be an acceptable location for advertising in highway terms.

Conclusion

The proposal seeks to erect a new small format D6 digital advertising panel at the site which is considered to be an appropriate location for advertising in principle and will contribute to the wider modernisation of the sites which sit within the MFG portfolio. The size and scale of the small format D6 display is de-minimis in the context of the service station.

The proposed conditions to control the operation of the advertisement including the luminance of the digital display will ensure that there is no adverse impact on amenity, both residential and visual, or public safety. For these reasons and the positive benefits set out, the proposal should be granted consent subject to appropriate conditions to control the operation of the advertisement.

Application Submission

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

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - 26633 /PA/01 Site Location Plan
 - 26633 /PA/02 Existing Site Plan
 - 26633 /PA/03 Proposed Site Plan
 - 26633 /PA/04 Proposed Site Plan
 - 26633 /PA/05 Existing and Proposed Elevations
 - 26633 /PA/06 Specification
 - 26633 /PA/07 CGI
- Appendix 1: Model Conditions

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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
for ALDER KING LLP

A handwritten signature in black ink, appearing to read 'Iwoollard'.

ISOBEL WOOLLARD
Senior Planner

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