
Appeal Decision

Site visit made on 28 July 2025

by **U P Han BSc (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 22ND August 2025

Appeal Ref: APP/Z0116/Z/25/3362907

31 Feeder Road, Bristol BS2 0SE

- The appeal is made under Regulation 17 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) against a refusal to grant express consent.
 - The appeal is made by Wildstone Estates Limited against the decision of Bristol City Council.
 - The application Ref is 24/04606/A.
 - The advertisement proposed is erection of one D48 advertisement display.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, the National Planning Policy Framework (the Framework) and the national Planning Practice Guidance (PPG) confirm that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts. Therefore, while I have taken account of the policies that the Council considers to be relevant, these have not been decisive in my determination of this appeal. Factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest¹.

Main Issues

3. The main issues in this appeal are the effect of the proposed advertisement on amenity and public safety.

Reasons

4. The appeal site relates to the gable wall of 31 Feeder Road (No 31) which currently hosts one existing 48 sheet paper and paste advertising display. The proposal seeks to replace the existing paper display with an illuminated digital format display of the same dimensions with no change to the position. The advertisement display would display sequential static advertisements, capable of changing every 10 seconds, with instantaneous change between them.
5. No 31 is a two-storey end of terrace property within a small parade of retail units fronting Feeder Road. Immediately to the west of the site is a large two storey car dealership building. The surrounding area is predominantly industrial and commercial in character.

¹ Regulation 3(2) of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

6. The appeal site is located close to the boundary of Silverthorne Lane Conservation Area (the CA), whose significance is derived largely from its historic development and architectural interest. This includes several listed buildings that reflect the area's rich industrial heritage. The historic street pattern and proximity to the Feeder Canal further underlines the working character of the area.
7. The Feeder Canal forms a strong southern boundary to the CA, with mature trees lining its embankment. These trees contribute to the verdant character of Feeder Road and help to screen views from within the CA towards the appeal site. Even in the less foliated seasons of autumn and winter, views of the appeal site from within the CA would be sufficiently filtered.
8. Feeder Road contains a variety of street furniture, including streetlamps, road signs, traffic lights and advertisements associated with businesses along Feeder Road. Within this context, the proposed advertisement would be read as part of the commercial character of the street.
9. Taking into account the above considerations, and due to its location, siting, scale, and design, the proposed advertisement would not appear incongruous within the established character and appearance of its surroundings. For the same reasons, the proposal would preserve the character and appearance of the CA and thereby its significance.
10. Accordingly, the proposed advertisement would not be harmful to amenity. Although not determinative, the proposal complies with Policies BCS21 and BCS22 of the Bristol Development Framework Core Strategy (June 2011) (the BCS) and Policies DM26, DM27, DM28 and DM31 of the Bristol Local Plan – Site Allocations and Development Management Policies (July 2014) (the DMP) insofar as they require development to contribute positively to an area's character and identity and safeguard or enhance the character and setting of conservation areas. The proposal would also comply with paragraph 141 of the Framework.

Public safety

11. The appellant has submitted a Highways Technical Note² (the HN) which I have carefully considered. Feeder Road is a busy traffic route connecting Bristol City Centre with the residential areas immediately to the east of the City Centre, as well as providing access to the Barton Hill Trading Estate. The appeal site is situated close to the signal-controlled junction of Feeder Road / Albert Road / Avon Street. The northern side of Feeder Road forms part of an advisory cycle route. In addition, parking bays located in front of the parade of shops—close to the appeal site—result in a narrowing of the carriageway at this point.
12. Pedestrian crossing facilities are provided at all four arms of the junction, comprising dropped kerbs, tactile paving and central refuges. However, the pedestrian crossings are not signal-controlled, requiring pedestrians to cross in gaps of traffic. This means that pedestrians may cross the carriageway at the junction suddenly and unpredictably.
13. During my site visit on a weekday afternoon, I observed a significant number of pedestrians crossing at all arms of the junction during gaps in traffic. I also observed numerous cyclists crossing the junction in a west-to-east direction. The

² Proposed Erection of LED Advertising Display Feeder Road, Bristol, Highways Technical Note 01 prepared for Wildstone Estates Limited (January 2025) 5116-HTN01.

numerous pedestrian and cycle movements, in combination with the busy road junction, road signs, narrow carriageway and street furniture results in a complicated and busy road environment.

14. Furthermore, it is evident that the surrounding area is undergoing physical transformation with new developments emerging that would likely increase pedestrian and cyclist activity in the area, such as the high rise student accommodation under development near the junction of Feeder Road and Albert Road. The intensification of pedestrian and cyclist movement in the area would likely elevate the potential for conflict between vehicles and other road users near or at the junction. Accordingly, it is important to minimise distractions for drivers and more vulnerable pedestrians and cyclists in this location to help ensure road safety.
15. PPG advises there are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality. However, it also states that all advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. As such I am mindful that the Council have concerns about the proposed digital advertisement display creating a distraction for motorists particularly due to its proximity to the aforementioned junction.
16. The proposed advertisement would be positioned facing west and so would be visible to traffic approaching in the eastbound direction. The NA indicates that the proposed sign location is obscured by the development site to the southwest corner of the Feeder Road / Albert Road / Avon Street junction and only appears fully in view at a point approximately 35 metres west of the signal stop line. However, based on my site observations, the development on the aforementioned corner of Feeder Road (which appeared to be nearing completion at the time of my site visit) is set back from Feeder Road, allowing the advertisement to be seen further west of the signal stop line than identified in the NA.
17. The appellant contends that the proposed minimum message duration of 10 seconds would accord with the Transport for London document 'Guidance for Digital Roadside Advertising and Proposed Best Practice (March 2013)'. This sets out a formula for calculating the optimum minimum message duration based on the maximum sight distance to the digital advertisement. However, for the reasons given above, I consider the sight distance to the advertisement has been underestimated. As such, I am not convinced that the proposed minimum message duration of 10 seconds is adequate.
18. Although the proposed sign would not overlap with the existing signal heads or the advance directional signage on the eastbound approach and is positioned beyond the signal stop line on Feeder Road, it would nonetheless remain visually prominent. This is particularly the case due to its bright, dynamic digital display, which is likely to attract attention and be perceptible to road users approaching the junction.
19. Road users would be required to process two competing, visually dynamic displays within an already complex and busy road environment. In such conditions, even brief moments of distraction—such as those caused by the sequential digital

advertisements proposed—could significantly increase the risk of driver error or reduced attention. This would be to the detriment of highway safety and the effective operation of the junction.

20. The absence of signal-controlled pedestrian crossings increases the reliance on driver vigilance and courtesy to ensure pedestrian safety. Any momentary distraction—such as that caused by the proposed advertisement—could reduce a driver's ability to notice and respond to pedestrians attempting to cross, particularly vulnerable users such as children, the elderly, or those with disabilities.
21. Despite the 20 mph speed limit, the junction is characterised by high levels of pedestrian and cyclist activity, which demands heightened driver awareness at a critical decision-making point. The introduction of an illuminated changing digital display in such a context would increase the cognitive load, which can impair decision-making and reaction times, even at lower speeds.
22. Based on analysis of CrashMap accident records in the nearby highway network, the HN concludes that the proposal will unlikely increase the risk of accidents occurring. While useful as a historic reference, CrashMap accident data is inherently limited in its ability to predict future road safety outcomes. This is particularly relevant in areas where pedestrian activity is likely to significantly increase, such as near the appeal site, where high-rise student accommodation is currently under construction. Furthermore, the proposal would involve replacing a static advertisement with a digital display featuring changing content.
23. While roadside advertising may be designed to convey simple messages, the assumption that such content is always easily absorbed and processed by road users overlook key concerns related to driver attention and cognitive load. Digital advertisements, in particular, often feature changing displays that can draw the eye and compete with critical information needed for safe driving. Given the volume of pedestrian and cycle activity, any additional visual stimulus can contribute to distraction, delay reaction times and elevate the risk of conflict. Therefore, the simplicity of the content does not negate the potential safety implications.
24. The appellant has referred to other similar advertisements in the UK and analysed the road safety record of the respective surrounding highway networks. However, on the evidence before me, I cannot be certain that they represent a direct parallel to the appeal proposal, including in respect of pedestrian crossing facilities and activity.
25. A condition could be imposed, if the appeal were allowed, to limit the brightness of the proposed digital display. However, taking account of the proposal and its context, these measures would not be sufficient to avoid harm to public safety.
26. I conclude that the position and nature of the proposed advertisement, would likely result in a distraction for users of the highway and would lead to the potential for increased conflict between road users. Consequently, it would therefore have a harmful effect on public safety. Although not determinative, the proposal conflicts with Policies BCS10 of the BCS and DM23 of the DMP insofar as they require development to ensure provision of safe streets. It would also be contrary to section 9 of the Framework.

Other Matters

27. The appellant has highlighted the benefits of digital advertisements which include reduction in pressure for new locations, free advertising space for the Council when the advertising space is unsold or void, an overall reduction in advertisements, reduction in vehicle trips, pollution and waste associated with reposting adverts and poster production, durability of the display materials, better management, monitoring and maintenance, uplift in business rates to spend on public services, better access to advertising displays for local businesses, a platform to broadcast emergency messaging, and opportunity to meet Smart City objectives. However, there is no indication in the Regulations, the Framework, or PPG that any factors other than amenity and public safety can be taken into account for, or against, a proposal. These matters have therefore had no bearing on my decision.
28. None of the above matters change my conclusion on the main issues regarding the impact of the proposed advertisement on amenity and public safety.

Conclusion

29. For the reasons given above, the appeal should be dismissed.

U P Han

INSPECTOR