

Manchester City Council
Planning Department
PO Box 532
Manchester
M60 2LA

17 August 2021

Dear Sir / Madam,

Please find enclosed an application for advertisement consent. This is part of a drive to modernise and upgrade advertising infrastructure to meet industry and best practice standards. The application is submitted under the premise of 'the free go' (Fees for Applications, Deemed Applications, Requests and Site visits 2012, Regulation 8), regarding application 128952/AOH/2020, decided 21 December 2020.

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Land at 71 Wellington Street, Manchester, M18 8BE. Site of 4 no. illuminated advertising displays: Upgrade of 2no. 48-sheet illuminated advertising displays to 2no. 48-sheet digital advertising displays. Removal of remaining 2no. illuminated advertising displays.

The Proposal

The proposal seeks to update and convert four 48-sheet illuminated advertising displays which operate with Class 13 deemed consent, to two 48-sheet digital advertising displays. The digital format will allow for increased durability, efficiency, and the ability to centrally control, update, and monitor content over a 24-hour period. Despite the modernisation, advertisements would remain illuminated, static, and two-dimensional, whilst incorporating an automated 10s sequential update. The proposal takes account of the Council's issues and concerns regarding a prior application for digital advertising displays at the site (App Ref: 128952/AOH/2020).

The scheme will meet modern requirements of advertisers. This will bring a wide range of benefits as follows:

- Upgrade of sites lacking in investment
- Reduction in vehicle trips for reposting adverts (i.e. from an average of 34 trips to 2)
- Consolidation and overall reduction in the number of advertising displays in the network

- Eradicating the need to print posters and avoiding the associated waste involved in the production process
- Ability to broadcast emergency messaging (e.g. public health messaging)
- Ability to use void periods for non-commercial campaigns
- Opportunity for creative, real time, and locally relevant advertising
- Opportunity to integrate additional hardware to meet Smart City objectives

Illumination

The Institute of Lighting Professionals best practice guidance; The Brightness of Illuminated Advertisements PLG05 2015 sets maximum limits for the illumination of digital displays at 300cd/m² at night and 5000cd/m² during the day when set to an all-white screen. The display will be programmed to reflect these limits, however, through use of internal sensors, timing clocks, and adaptive display software, the screen would adapt to real time ambient conditions, and likely operate at far lower levels.

Recommended Conditions

The following conditions have become established as best practice for roadside digital displays. It is therefore recommended they are applied in the interests of amenity and public safety:

- Static images to be displayed only (no moving or flashing images).
- Changes between adverts to take place instantly with no, fading, swiping, or merging of images.
- Illumination shall not exceed the thresholds contained within the Institute of Lighting Professionals (ILP) guidance document PLG05 – The Brightness of Illuminated Advertisements 2015.
- Advertisements to change no more frequently than once every 10 seconds.

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).

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 under paragraph 132 reiterates the need for assessment to be conducted only in the interests of amenity and public safety, taking account of cumulative impacts. National guidance provides further clarification and identifies that the regime for advertising consent should be a ‘lighter touch’ than the system for obtaining planning permission for development.

The Site

The application site comprises a small parcel of land which contains four illuminated advertising displays. The site is located east of Wellington Street at the junction of Wellington Street, Garratt Way and Cross Lane. The surrounding area comprises predominantly retail and commercial land use. A hairdresser is bound to the northeast of the site and the east is bound by a small area of self-seeded vegetation. To the south, aligning Wellington Street a row of commercial units are present including a bicycle sales & repair business, convenience store, clothing store, and salon. Gorton market is located approximately 50m to the west, with further retail and commercial development to the north along Cross Lane and Wellington Street. The site is also located within the Gorton District Centre as defined by the Manchester Local Development Framework Proposals Map, further confirming the site and surrounding areas commercial nature.

Planning Considerations

The site is a longstanding location for advertising, having supported the display of illuminated content for over 21 years. It operates with deemed consent under Class 14 of the Regulations, with its first documented usage dating back to April 2000, establishing the principal, and acceptance, of large format illuminated advertising as a roadside feature at the site. However, it is acknowledged by the applicant that the sequential update of images, would potentially require assessment in relation to potential impacts upon amenity and public safety. These are considered in detail below.

Amenity

Concerning amenity, the proposal would not be detrimental in either an immediate or wider sense. It is not within a Conservation Area, attached or adjacent to Listed buildings, or within proximity of any local heritage assets.

The main character features are the commercial buildings, businesses, advertisements, and the adjacent Wellington Street / Cross Lane highways. National guidance and advice set a presumption in favour of locating advertisements in commercial areas such as this; here, impacts are appreciably less and commensurate to the environment in which they function. In this regard the proposal is considered acceptable.

The proposal will dramatically improve the amenity value of the site through the following steps:

- 1) The significant improvement in biodiversity across the site which includes the planting of trees, shrubs, hedgerow, and wildflower seeding of low-quality grassland areas. The biodiversity improvement works will contribute towards and provide habitats for invertebrate species and support urban greening priorities. **A total 335m² of wildflower planting, 47m² hedgerow planting, and 44m² of tree planting will be implemented across the site resulting in a total 426m² of habitat gain due to the implementation of the proposed digital displays.**
- 2) Updating two aging advertising displays to digital equivalents, introducing elements of high quality, minimalistic design to the site and surrounding area.
- 3) Removing the remaining advertising displays, resulting in a 50% reduction in advertising content at the site.
- 4) Landscaping the site to improve its appearance within the street scene. Amenity planting and seating areas will be introduced to improve its standing within the street scene.
- 5) Introduction of new fencing will further discourage anti-social activities at and surrounding the site.

The proposed digital displays will replicate the appearance of the existing units in terms of size, scale, and elevation. The adaptive screen technology within the digital units will also enable them to mimic content presented on the existing paper and paste illuminated advertisements; sensors and timing clocks will analyse ambient conditions and adapt output in real time to suitable levels. Content would be fully controlled, preventing over prominence of the site / display, whilst ensuring it does not become an over dominant feature of the street scene.

The site as proposed would be seen within a commercial context, and as previously highlighted it would be suitably positioned within a District Centre designation. The 50% reduction in advertising displays will improve views looking towards the site, removing any sense of site clutter or cumulative effects.

Furthermore, due to the site's improved layout, only one advertising display will be seen at any one time by passing vehicle users, leading to a 75% decrease in visible content. The site's backing by mature vegetation and the surrounding built form will also prevent the proposed displays from being seen as isolated or standalone features. It is therefore considered the site would continue its successful integration to the street scene.

There would be a material improvement to the amenity of the site and surrounding area regarding the use of the proposed digital displays, landscaping, and biodiversity improvement works. The displays would sit comfortably in their visual context, without harming the qualities of the site, or the character and appearance of the wider environment.

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 illumination has been established as acceptable through a previous grant of express consent and the site's long term operation, the Council need only consider whether the proposed controls over the update of images are sufficient to ensure that there is not an unacceptable impact on highway safety. These controls are now well established as industry standard and are deemed acceptable in most instances. As such, a departure from this approach would need to be justified by site specific reasons.

The proposed displays would occupy a setback and offset position from the adjacent Wellington Street, Garratt Way, and Cross Lane highways, ensuring sight lines and visibility splays are maintained. The displays would be seen by traffic travelling predominantly north and south on Wellington Street. Views of the site would also be possible from Garratt Way and Cross Lane when in close proximity.

The road network surrounding the site location is limited to 20mph, and is well lit, straight, level and provides good forward visibility. The network's straightforward and uncomplex nature determines that the cognitive demand on road users would be low, enabling them to glance views of advertising content without issue or distraction. As such, drivers would be entirely capable of viewing advertising content whilst maintaining stopping distances, an awareness of surrounding traffic and pedestrian movements, and the sighting of traffic signals and the road ahead. Furthermore, the change in road surface to tiles provides significant visual cues to the upcoming junction and will serve to elevate a driver's concentration on approach.

Under these circumstances, and in conjunction with the Council's previous determination that two identical digital displays would be acceptable in terms of highway safety (app ref: 128952/AOH/2020), it is considered that the proposal would not constitute a hazardous distraction to anyone exercising a reasonable standard of care.

Consequently, the proposal would not give rise to public safety issues that would prevent the granting of an express advertising consent.

Conclusion

The proposal to update the advertising site at 71 Wellington Street will offer material improvements to the amenity of the site, street scene, and surrounding area. Four illuminated advertising displays will be replaced with two identical digital units reducing onsite advertising by 50% and removing any potential for site clutter or negative cumulative effects. The replacement displays will be repositioned to better serve the local community and reduce the sites prominence. Landscaping and biodiversity improvement works will benefit the surrounding area in terms of appearance and environmental performance. Strict control over the proposal's operation by internal sensors, timing clocks, and planning conditions will ensure the proposal successfully integrates to the street scene, mimicking the appearance of content displayed on the existing paper paste units.

In terms of public safety, the adjacent highway network is uncomplex and allows drivers ample opportunity to glance content without losing sight of the road or traffic conditions ahead. Highway users would therefore be entirely capable of viewing content without endangering public safety.

Application Submission

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

- Completed Application form prepared by Wildstone;
- Letter Statement prepared by Wildstone (this letter);
- Integrated Landscaping Plan & Planting Specification
- CGI interpretation of proposal
- Architectural drawings prepared by Wildstone;
 - 7937_PA_01 Site Location Plan
 - 7937_PA_02 Existing Site Plan

- 7937_PA_03 Proposed Site Plan
- 7937_PA_04 Landscape design
- 7937_PA_05 Elevations – Existing & Proposed
- 7937_PA_06 Specification

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,

RP

Richard Page

Planner

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