

Our Ref: JW/GM/93456

15 March 2022



Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

Dear Sir/Madam

**REPLACEMENT OF EXISTING EXTERNALLY ILLUMINATED POSTER ADVERTISEMENT DISPLAY WITH INTERNALLY ILLUMINATED D-POSTER
LAND TO THE NORTH OF THOMPSON STREET, ANCOATS, M4 4BW**

PLANNING PORTAL REFERENCE: PP-11122346

Alder King Planning Consultants have been instructed to submit an application for advertisement consent to upgrade an existing 96-sheet poster and paste billboard to a modern 48-sheet digital billboard poster format ('D-Poster') capable of being operated from a central location.

This is part of a wider project to modernise the applicant's advertisement network utilising new display technology that is lightweight and can be erected with limited additional engineering, as the digital poster weighs little more than the paper and paste poster it will replace. The quality of the image produced will mimic that of a traditional poster, with the overall aim of the project being to replace like for like with no adverse impact on visual amenity.

The Proposal

The proposal seeks to replace the existing poster and paste board on land to the north of Thompson Street, Ancoats, M4 4BW ('the site') with an internally illuminated D-Poster which will display static advertisements on rotation.

The site currently comprises a 96-sheet externally illuminated billboard. It is proposed to replace this with a 48 sheet internally illuminated D-Poster. This represents a 50% reduction in the scale of advertisement signage at the site. The submitted existing and proposed site plans including elevations reflect the replacement of the existing poster and paste board at the site with a new illuminated digital screen.

When assessed against existing billboard at the site, while the position and orientation of the proposed signage remains consistent, the size constitutes a reduction in scale.

The quality of the image produced will mimic that of a traditional poster board, with the overall aim of the project being to replace like for like with no associated adverse impacts. The submitted before and after photos at an example site at 142 Liverpool Road, Warrington, shows visually how the upgrading of a traditional poster and paste board is done without materially changing the appearance. Further supporting information is provided on the submitted D-Poster technical information sheet.

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The proposals allow the existing advertising network to be better managed, monitored and maintained, to 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;
- Consolidation and overall reduction in the number of billboards in the network;
- Eradicating the need to print posters and avoiding the associated waste involved in the production process;
- Ability to broadcast emergency messaging;
- Ability to use void periods for non-commercial campaigns;
- Opportunity for more creative real time and locally relevant advertising;
- Opportunity to integrate additional hardware to meet Smart City objectives.

Content will be controlled remotely in real time from a Networks Operation Centre (NOC) and the site will be monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software will report any faults back to the NOC and a kill switch will turn the content to black until it can be resolved.

The display would be limited to 300cd/m2 at night time (on a full white display) in accordance with the Institute of Lighting Professionals best practice guidance; *The Brightness of Illuminated Advertisements PLG05 2015* and will adjust according to ambient brightness. The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the existing poster being replaced.

The following conditions have become established as best practice for roadside digital displays and will be applied to control the operation of the digital poster 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 sequencing, fading, swiping or merging of images;
- Advertisements to change no more frequently than once every ten seconds.
- At no time shall the Luminance level of the signs exceed the thresholds contained within the Institute of Lighting Professionals (ILP) guidance document PLG05 – The Brightness of Illuminated Advertisements 2015 (or any subsequent amendment/replacement to this guidance).

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).

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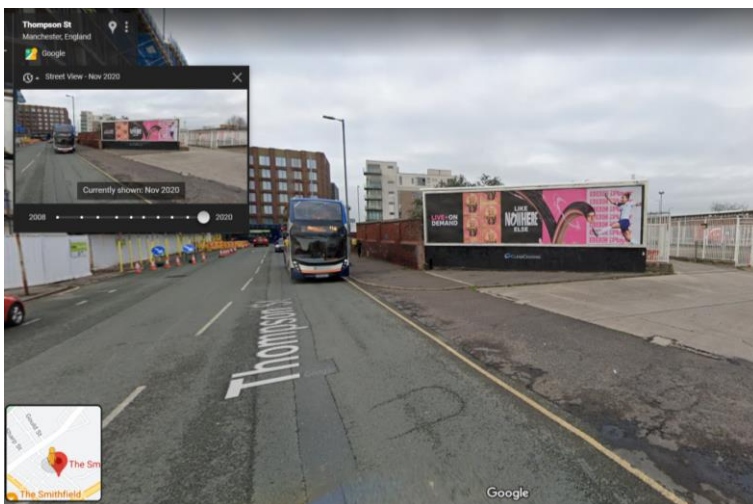
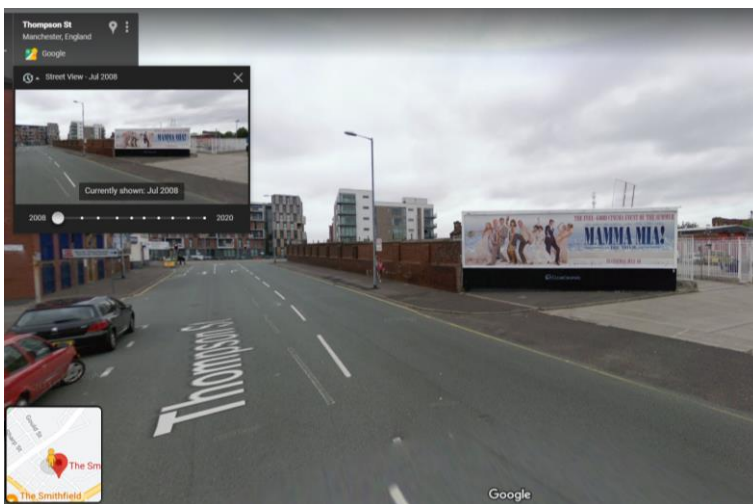
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The Site

The proposal site is located to the north of Thompson Street, Ancoats, M4 4BW and supports one 96-sheet externally illuminated advertisement billboard. In the immediate context, the site lies adjacent to a car park to the north opposite a car park to the south. The signage on the site faces south-east and is visible to traffic travelling west along Thompson Street.

The proposal site is an established location for advertising, having supported one 96-sheet billboard for over 13 years. Photographic evidence, using Google Streetview, confirms that the existing billboard has remained in place since at least July 2008. This therefore benefits from deemed consent under Class 13 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. The site is shown below in **Figure 1** in July 2008 and November 2020.

Figure 1: Site photos dated July 2008 and November 2020



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The street scene along Thompson Street is characterised by further of advertisement signage. Further signage is located along Thompson Street with a 48-sheet billboard located to the west and a 96-sheet externally illuminated billboard located the east of the site, both orientated facing west.

This sets out the position of the site and immediate vicinity in that it is an established area for signage. It is noted that the proposals seek to only upgrade and digitise an existing lawful billboard and would not further intensify the area in this regard. Rather, the scale of billboard proposed on the site constitutes a reduction from the current position.

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 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 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 Manchester City Council Local Plan constitutes the Manchester Core Strategy (adopted July 2012) and the Extant Unitary Development Plan (adopted 1995, containing city-wide and local area policies not replaced by the Core Strategy). Policies relevant to the propose works include:

Planning Considerations

The proposal will decrease the scale of advertisement on the site by 50%. The proposed reduction in the scale of the billboard at the site and the change to remote control over operations seeks to ensure that the change in the visual impact of the site on the surroundings is beneficial. The impact of the proposed works is considered in amenity and public safety terms below.

Amenity

The proposal seeks a 50% net decrease in advertisement billboard space at the site. Moreover, the proposal seeks to replace the existing dated billboard which has been in place for over 13 years with a modern digital screen. As such, this will positively impact on visual amenity. The level of illumination of the proposed D-Poster will be set to ensure that the proposed advertisement is not visually materially different from the existing position. The before and after comparison photographs on the submitted example site at 142 Liverpool Road, Warrington illustrates the minimal visual difference between the existing type of display on the site and the proposed replacement once controls are put in place. The proposed change to replace the existing 96-sheet billboard with a 48-sheet billboard further serves to reduce the overall prominence of the signage on the immediate surrounding area thereby enhancing visual amenity.

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The position and orientation of the proposed signage within the site is such that there are no sensitive receptors in close proximity facing the signage. Moreover, the existing signage is itself illuminated and so it is considered that the change in the proposed signage to internal illumination represents minimal visual difference. During the day, the proposed level of illuminance will be set to mirror that of a traditional poster and paste board, in line with the current position of the site. At night time, the proposed signage represents a change from being externally illuminated to internally illuminated. The controls proposed over the level of luminance along with the orientation of the D-Posters will ensure that this material changes does not cause material harm to amenity.

It is noted that street lighting lines Thompson Street with a column adjacent to the site, offering a further degree of illumination to the existing signage, beyond the lighting trough fixed above the billboard. Given the control measures forming part of the proposed works at the site, it is considered that there would be little perceptible difference in lighting levels from the site to any nearby receptors.

When considering the merits of the proposed digital advertisement board, it is important to note that should consent not be forthcoming, the fall-back position amounts to what already exists on the site which constitutes an externally illuminated poster and paste billboard of greater size to that of the proposed D-Poster. The principle of the proposed use is therefore already established and the current poster board would remain in situ should the proposed digitalisation not be approved.

Consideration should only therefore be given to the replacement of the existing advertisement board and any impacts this would bring. Visually, owing to the proposed reduced scale in advertisement at the site, it is considered that this will positively impact on the street scene and sufficient control will be in place to ensure there is no detrimental impact on amenity when compared to the current lawful position.

The context of the surroundings including no sensitive use in close proximity, facing the site and the plethora of signage in the area, including illuminated signage on the site and further along Thompson Street establishes the site as appropriate for an illuminated advert of the type proposed. Additional controls over the display will be considered if necessary to remedy a specific amenity concern however it is considered that the removal of existing poster and paste board at the site and replacement with smaller D-Poster would not materially impact on the amenity of any residents in proximity to the site.

Given the nature of the site and surrounding area and the presence of other signage in the immediate context, there would be little, if any, material change in the appearance of the street scene. In any case, the proposal would reduce the extent of signage at the site and so this would provide betterment. The existing advertisement billboard at the site has been in place for over 13 years and constitutes a well-established feature of the street scene. The proposal would serve to reduce the cumulative impact of advertisement signage in the area while sitting comfortably in the visual context and not harming amenity, the qualities of the site, or the character or appearance of the wider 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. As the principle of illuminated advertisement has already been established at this location, the Council must only consider whether the proposed controls are sufficient to ensure that there is no additional distraction which would cause

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an unacceptable impact on highway safety. Should the Council's Highways department identify any reasons why the location might be challenging to drivers, the applicant would be open to discussing alternative controls. 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.

The proposed D-Poster would be seen by traffic travelling west along Thompson Street which is well lit, straight, level and has excellent forward visibility. Road users would be fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead and would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

This site is also visible to traffic pulling out from Cross Keys Street, turning left on to Thompson Street. This is consistent with the existing position. The proposed reduction in the scale of advertisement and change from being externally to internally illuminated is considered to have no material impact on the level of distraction caused to any road users such that it would have the potential impact on highway safety. It should be noted that drivers are almost always continually assimilating sensory inputs from multiple sources whilst driving. It is not considered that the presence of the proposed D-Poster at the site would represent a material departure from the types of features that drivers are used to seeing at the roadside, and are commonplace along Thompson Street. The proposal would therefore not appear as an incongruous feature.

The introduction of a sequential change in the adverts will not have a material impact on the level of distraction as the changeover will be instantaneous and not more frequent than once every 10 seconds. This will reduce eye dwell time on the D-Poster and therefore the potential for a distraction is low. In this regard, free flowing traffic along Thompson Street will see most road users pass the sign without seeing a sequential advert change and in times of stop-start traffic, road users will be travelling very slowly. The introduction of a sequential advert change on the signage at the site is therefore considered to pose no increase in risk to highway safety. The proposal to reduce the scale of advertisement on the site is considered to commensurately reduce any potential risk of driver distraction.

Under these circumstances, such a familiar feature of Thompson Street and the surrounding highway network 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, which would prevent the granting of an express advertisement consent.

Conclusion

The existing advertisement board on the site has been in place for over 13 years, benefitting from deemed consent, and is a well-established feature of this part of the street scene along Thompson Street.

The proposal constitutes a 50% net reduction in advertisement space on the site with the replacement of the existing 96-sheet billboard with a 48-sheet billboard. The visual impact of the site on the surroundings is therefore considered to be improved by the proposal. The proposed change to the means of illumination to the site from external to internal shall also not give rise to any adverse impacts.

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The proposed conditions to control the luminance of the screen and the operation of the digital screen will ensure that there is no harm to amenity or road safety. Furthermore, the reduced scale of the advertisement board on the site is considered to lessen the potential for distraction by road users.

For these reasons, when assessing the impacts of the proposed works with regard to amenity and public safety, it is considered the proposals provide betterment to current lawful position in both regards and that this application should be granted consent.

Application Submission

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

- Completed application forms prepared by Alder King Planning Consultants;
- Letter Statement prepared by Alder King Planning Consultants (this letter);
- Before and after photos, example site at 142 Liverpool Road, Warrington, WA5 1QX9;
- D-Poster Technical Information Sheet;
- Site Location Plan ref: 001-0203-5305/PA/01;
- Existing Site Plan ref: 011-0203-5305/PA/02;
- Proposed Site Plan ref: 011-0203-5305/PA/03; and
- Existing and Proposed Elevations ref: 011-0203-5305/PA/04.

Additionally, we will arrange payment to Manchester City Council for the sum of £462 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

A handwritten signature in black ink, appearing to read 'Jamie Wilton', written over a light blue horizontal line.

JAMIE WILTON
Planner

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