

Our Ref: 784-B032514 / YZ020301470501/601

Planning
Manchester City Council
PO BOX 532
Manchester
M60 2LA

18.03.2022

Dear Sir/Madam

ASHTON NEW ROAD, ADJACENT TO COUNCILLOR STREET, M11 3RR

APPLICATION TO UPGRADE EXISTING ADVERTISEMENT BILLBOARDS TO A DIGITAL LED ADVERTISEMENT

Tetra Tech has been instructed to submit an application for advertisement consent to upgrade the existing static billboard at the site address above as part of a programme of modernising Network Rail's advertising stock to a digital poster (D-poster) format.

The digital poster advertisements are capable of being posted from a central location without the need to visit each site individually. The digital image display will ensure a consistent quality of image is always presented, mimicking that of a traditional poster. The overall aim of the advertisement upgrading project is to replace like for like, with no adverse impact on visual amenity or public safety.

This application is accompanied by the below drawings and plans:

- Completed application forms prepared by Tetra Tech;
- Supporting Statement prepared by Tetra Tech (this letter);
- Drawing no. YZ020301470501/601_001_A – Site Location Plan
- Drawing no. YZ020301470501/601_002_A – Existing Site Elevation (501)
- Drawing no. YZ020301470501/601_003_A – Proposed Site Elevation (501)
- Drawing no. YZ020301470501/601_004_A – Existing Site Elevation (601)
- Drawing no. YZ020301470501/601_005_A – Proposed Site Elevation (601)
- Drawing no. YZ020301470501/601_006_A – Existing and Proposed Sign Specification
- Drawing no. YZ020301470501/601_007_A – Photo Montage (501)
- Drawing no. YZ020301470501/601_008_A – Photo Montage (601)

We have arranged for payment for the sum of £462 to cover the statutory application fee for the advertisement consent application.

The Site

The proposal site is located close to the junction of Ashton New Road and Councillor Street within the railway embankment boundary and currently supports 2 static 48 panel billboards that are internally illuminated, positioned back-to-back. The billboards face west and east along Ashton New Road. The site surroundings are predominantly commercial in character. There are no residential properties in the immediate vicinity. There are no heritage assets or listed buildings in the vicinity.

The proposal site is an established location for advertising, having supported a static advertisement in this location for over 10 years.

The Proposal

The proposal seeks to “repost” the existing static displays at the junction of Ashton New Road and Councillor Street with “D-posters” which will display multiple static advertisements on rotation. The new screen dimensions are to be 6500mm width x 3500mm height. The screen would be installed at a suitable height above ground level to appropriately avoid against any potential for vandalism.

The upgraded D-poster advertisement boards would adopt the same position and orientation as the existing static advertisement billboard in situ.

The proposals will allow Network Rail’s existing advertising network to be better managed, monitored and maintained, to meet the modern requirements of advertisers. This will bring a wide range of benefits including:

- Ensuring a consistent quality of advertisement image, unaffected by weathering damage or ageing.
- Providing investment to improve the appearance of existing advertisement sites;
- Revenue generated is in the public interest as it can be reinvested in the UK’s railway and passenger infrastructure by Network Rail;
- Consolidation and delivering an overall reduction in the number of billboards in the network, helping to declutter street scenes;
- A reduction in vehicle trips for reposting paper adverts;
- Eradicating the need to print posters and avoiding the associated waste involved in the production process;
- The ability to broadcast emergency messaging;
- The ability to use void periods for non-commercial campaigns;
- Opportunity for more creative real time and locally relevant advertising;

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 proposal will utilise new display technology that is lightweight and can be erected with limited additional engineering, as the digital poster installations typically weigh little more than the traditional paper and paste poster billboard it will replace.

The level of luminance can be suitably controlled in line with the Institution of Lighting Professionals (ILP) relevant guidelines. During the hours of darkness the sign will not exceed the maximum

threshold set in the ILP guidelines¹ of 300cd/m² within urban and suburban areas. The signs are also capable of automatically adjusting to current lighting conditions ensuring against any “over illumination”.

The displays are capable of being dimmed to within 1% of their maximum output and as such any concerns regarding levels of illuminance at a particular site can be dealt with swiftly and remotely. Lower levels of illuminance prolong the lifetime of the display and reduce electricity costs and as such there is an operational and economic imperative to ensure that digital signs are not “over illuminated”.

In order to ensure that the proposed digital advertisement does not materially or detrimentally impact upon amenity or public safety, the applicant is willing for the sign’s operation to be controlled via the use of appropriate planning conditions. Suggested conditions could include the following:

- Maximum level of night time illuminance to be set to 300cd/m²;
- 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; and
- Advertisements to change no more frequently than once every ten seconds.

The above conditions are industry standard and are commonly seen applied to applications of this type. Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant and where these may be sought, we would welcome dialogue with the case officer to agree these.

Planning History

Relevant planning history on the site indicates that permission has previously been granted for 2 back to back internally illuminated digital LED advertisements at the site;

125121/AOH/2019 – Ashton New Road opposite junction with Councillor Street, Manchester, M11 3AG – Application for the replacement of 2 no. existing backlit illuminated advertisement panels with 2 no. internally illuminated back-to-back digital LED advertisements – Approved 25/11/2019.

Given the time which has passed since the award of this previous consent, our client wishes to seek a fresh consent.

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.

¹ Institution of Lighting Professionals, ‘The Brightness of Illuminated Advertisements PLG 05’ (2015)

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 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 Local Plan for the local authority area principally comprises the Core Strategy (2012-2027) and saved policies from the Unitary Development Plan.

Policy DM 1 (Development Management 1) in the Manchester Core Strategy emphasises the need for any proposal to take into consideration the character of the surrounding area. The policy establishes that developments should be appropriate with regards to siting, layout, scale, form, massing, materials and detail. The policy also indicates that development proposals should have regard to their potential impacts upon amenity.

Policies DC15.1 and DC15.2 in the Manchester Unitary Development Plan specifically refer to advertisements and hoardings. The policies identify a number of considerations to be taken into account in the consideration of advertisement consent applications. Within Policy DC15.1 this includes providing appropriate consideration to the impacts upon visual amenity and public safety.

Policy DC15.2 states the Council will also consider a proposal's effect on the architectural integrity of any buildings that are on site or any effects upon a building's proper use. Any proposal should be unobtrusive and should not intrude into residential neighbourhoods and areas of high amenity value in addition to having no adverse effects on public safety or adversely affecting the flow of any traffic in the vicinity.

Importantly, the Council's policies accept that *'advertisements can have a positive role in improving the quality of the visual environment in the City'*.

Planning Considerations

In replacing existing static advertisement signs with upgraded digital signs the proposals will not increase the number of adverts in the area. The like for like replacement of the display and the controls put in place over the sign's operation will ensure that any change to the visual impact of the site and its surroundings will be “de minimus” and not material.

Notwithstanding that the principle for the site to accommodate advertisements has already been established, it is acknowledged by the applicant that the change in the type of illumination and the potential to increase the rate of change of the adverts requires express consent. The impact of the proposal in respect to amenity and public safety is considered in turn below.

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Amenity

As the proposal seeks to “repost” the existing advertisements and therefore mimic the existing situation, there will be minimal impact on visual amenity. The size and positioning of the advertisements will remain unchanged. The side-by-side comparison photo montage of the D-Poster installation provided with the planning drawings helps to illustrate the minimal difference between the existing type of display and the proposed digital replacement.

The existing signs at the site are currently internally illuminated. The replacement sign’s illumination can be suitably controlled by a standard condition to ensure that the change to a digital format will not cause material harm to amenity, including to any neighboring occupants or properties. The level of luminance will be set at no greater than 300cd/m² during hours of darkness. The context of the site’s urban surroundings, which include other illuminated adverts and street lighting establishes the site as appropriate for an illuminated advert of this type. Additional controls over the display can be considered if necessary to remedy a specific amenity concern. The proposed upgraded signs will accord with the requirements of UDP Policies DC15.1 and DC15.2.

Public Safety

When assessing public safety, the key considerations are whether the location is appropriate (i.e. not detrimental to highway safety) and whether the level of illumination and the sequential change between advertisements is controlled to prevent distraction from driving. Consideration has been provided to the sign’s siting to ensure it will not impact upon the safe operation of the highway network or impact upon pedestrian movements.

As the principle of an advertisement has already been established at this location, the Council must only consider whether there is any additional distraction arising from the proposed digital sign which would cause 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.

Conclusion

This application is part of a project to rationalise and bring Network Rail’s stock of poster and paste billboards into the 21st century.

The proposal will not change the size, position or orientation of the adverts. As such, the established acceptability of an advertisement in this location should not materially change. Commonly used standard conditions can be employed to appropriately control the luminance and operation of the digital screen to ensure that no material harm to amenity or road safety would occur.

For these reasons and the positive benefits set out above, it is considered that the application should be granted express advertisement consent.

We 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 the undersigned.

Yours sincerely



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