

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

14 June 2021

Dear Sir / Madam,

Please find enclosed an application for advertisement consent at the above location. A detailed description of the application is provided within this letter and accompanying documents.

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

**Conversion of existing advertising display to a digital advertising display at:
Land at Pin Mill Brow, Manchester, M12 6AE**

The Proposal

The proposal seeks to erect a single digital display at the above site. It would be located to the east of the existing digital advertising display and enable content to be viewed by users of the A635 Pin Mill Brow when heading north / northwest. Advertisements would appear to highway users as static, two-dimensional, illuminated images that update on an automated 10s sequential cycle.

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

- Upgrade of sites lacking in investment
- 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

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 the screen is capable of adapting to real time ambient conditions and operating 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 includes a southwest facing digital advertising display. The site lies adjacent to the Pin Mill Brow A635 highway and industrial / commercial units to the north, south, and west. To the sites immediate southeast is the Currys PC World store and associated car parking. Manchester Piccadilly Train station and rail infrastructure are positioned a short distance to the west. The site and surrounding area are of an urban industrial / commercial nature, and appear well suited to the display of advertising content, with no sensitive receptors nearby.

Planning Considerations

The site is a longstanding location for advertising, having supported the display of illuminated content for at least 15 years. It now operates with express consent for a digital display under reference APP/B4215/Z/19/3229583, granted by the Planning Inspectorate August 2019. The presence of the existing digital display establishes the principle and acceptance of digital format advertising at this location. However, it is acknowledged by the applicant that the proposal, under the Regulations, would 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 character and setting of the site and surrounding area is commercial. The busy A635 Pin Mill Brow ring road adjacent to the site provides access to and from central Manchester and routes to the north, east, and south for commercial and commuting traffic. Commercial buildings are present throughout the immediate and surrounding area, and it is in locations such as this that National policy and advice advocates locating advertisements; impacts are appreciably less and commensurate to the environment in which they function. In this regard the proposal should in principle, be acceptable.

The proposal would be of a minimalistic design and appearance, constituting a simple screen with protective framing. It would be supported by two steel poles painted grey / black. Its modern design and low impact appearance would reflect that of the existing digital display and nearby commercial buildings which comprise the immediate surroundings. It would be viewed as a commercial installation residing within an area of commercial character and land use. Owing to the built form and overall commerciality of the area, the proposal would

integrate to the street scene without appearing overly prominent or as an isolated / standalone feature.

The proposal is therefore unlikely to lead to any material change in the appearance or character of the site and street scene. Thus, the digital display would sit comfortably in its visual context without harming amenity, 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 digital advertising has already been established at this location, the Council need only consider whether the proposed controls over illumination and 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 display would occupy a setback and offset position from the adjacent highway, ensuring sight lines and the visibility of traffic signals are maintained. The display would be seen by traffic travelling on the Pin Mill Brow highway which is limited to 30mph, is well lit, straight, level, and has excellent forward visibility. The straightforward and uncomplex nature of the highway at this point determines that the cognitive demand on road users would be modest, enabling them to glance views of advertising content without issue or distraction. As such, drivers would be entirely capable of viewing advertisements, whilst maintaining stopping distances, an awareness of surrounding traffic and pedestrian movements, and sighting of the road ahead.

Under these circumstances 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 is considered unlikely to have any negative impacts upon amenity or public safety. The proposed conditions to control the luminance of the screen and operation of the digital display will ensure that there is no additional harm to amenity or road safety.

The sighting of the proposal in combination with the composition of the local area, and the character / land use of the wider surroundings ensures that the digital display would not detract from the site or street scene. In terms of public safety, the adjacent highway 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);
- Architectural drawings prepared by Wildstone;
 - 15054_PA_01 Site Location Plan
 - 15054_PA_02 Existing Site Plan
 - 15054_PA_03 Proposed Site Plan
 - 15054_PA_04 Elevations – Existing & Proposed

Additionally, we will arrange payment to Manchester 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,

RP

Richard Page

Planner

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