

13th May 2021

Manchester City Council
City Centre Team – DM
P.O. Box 532
Town Hall
Manchester M60 2LA

Dear Madam/Sir,

Town and Country Planning Act 1990
Town and Country Planning (Control of Advertisements)
(England) Regulations 2007

Proposal: The Replacement and Upgrade of Existing Community Information Panels (CIP's) in Manchester City Centre

Group 4: Core City Application Sites

This letter is submitted in support of a number of applications for Advertisement Consent under Regulation 9 of the Advertisement Regulations, part of a phased program to upgrade and replace the City Council's existing advertising estate, pursuant to a Tender award to JCDecaux at the end of last year.

This project marks a new chapter in the partnership between JCDecaux and Manchester City Council (MCC), which, with the continued partnership, presents an exciting opportunity to completely transform the current advertising estate in the City with the latest digital screen and Smart City technology that will benefit those who live work and visit Manchester. JCDecaux has pioneered the use of modern technologies in the outdoor media environment coupled with a drive towards greater efficiency and sustainable practices across the industry. This ethos is applied to the delivery of this project with the aim of redefining the quality and functionality of the City's advertised estate.

In order to manage and plan the delivery of this project, and the systematic replacement of the entire estate, the City has been separated into three zones. The Core zone covers the city centre locations within and surrounding the retail centre; the Outer area includes sites mainly along the southern and eastern edge of the retail centre and the Tertiary zone includes sites on the periphery of the City. In addition to

the three zones, the proposals for the Core are further distinguished by function and the manner of advertising presentation.

The existing estate comprises 90 advertised structures at separate locations across the City, with a mix structure types¹ that includes 17 of the tall cylindrical columns in three different designs. The remainder of the estate is made up of the standard freestanding 6 sheet displays or commercial information panels (CIPs), which include the Paris 2 design and a lesser number of the totem structures. All of the existing advertising structures will be removed and replaced with 86 units of identical design in order to maintain a consistent quality and look across the entire MCC estate. This display unit is called the “Forum” a product that is unique to JCDecaux and represents the latest innovation in roadside screen technology capable of showing dynamic commercial and community messages on both sides of the slimline unit. The Forum unit is tailored for Manchester and will feature the MCC logo and the iconic Manchester Bee, displayed on the skirt on each side of the unit.



Detail on the look and design of the Forum CIP unit is contained within Part 3 of the application documentation, together with information on the method of display. Each set of application documents include, as Part 1, a map of the City showing the distribution of all units across the City and a detail map showing the distribution of the units relating to the specific application Group. Part 2 contains the site plan and images relating to the individual application site.

¹ Refer to Part 3 Document which shows the existing unit types

Since the contract award, the applicant has actively engaged with City Council Officers from the Planning, Highways, Regeneration & Public Realm teams respectively to agree the suitability of the site locations for the type of CIP unit being proposed and to determine the application Grouping. This is the fourth of six Groups of applications and relate to 15 sites within the Core City Centre, for freestanding units incorporating screens that show only static content.

Application Background

The contract awarded to JCDecaux is to manage and maintain the Council's roadside advertising estate for a minimum of ten years. This contract represents a renewal of the long-standing partnership between MCC and JCDecaux, which began over 22 years ago. The proposals presented at tender stage and contained within these applications demonstrate the Company's commitment and investment in improving the quality, form and function of street furniture across Manchester. JCDecaux is at the leading edge of development in the advertising medium, with extensive experience of creating some of the most innovative and striking advertising sites in the city, rail, retail and airport environments. The Company's objective is simple; to develop the best locations and set the highest standards in build quality, design and innovation.

The Company's ability to innovate and its commitment to sustainable solutions is not unknown within Manchester. In 2016, JCDecaux worked with Transport for Greater Manchester (TfGM) to develop a Concept Shelter, showcasing the latest in technology and urban design.



The state-of-the-art bus shelter at Piccadilly enhances the public space by using a range of robust yet attractive materials and lighting that not only offers more comfort to the travelling public but includes the latest technology to enhance the overall passenger experience. The shelter was created by AUREL Design Urbain, supported by Peter Saville, co-founder of Manchester's Factory Records. The shelter incorporates device charging points, free Wi-Fi and local information delivered via a digital LiveTouch touchscreen. This test case creation not only raises quality standards but also illustrated what is possible and how new technologies and methods are changing perceptions and how people interact with street furniture. These principles have been applied to the proposal for Manchester.

Sustainability Aims

The aim of promoting economic growth while respecting people and the environment has long been the Company's aim. Sustainable development and energy efficiency drive the development of innovative new services that are ecological, aesthetically pleasing and highly functional. JCDecaux's Research and Development team has undertaken studies on the adaptation of existing systems for energy reduction and the use of green energy. Significant progress has been made in the selection of energy efficient electronic components and adaptation of software layers, which are now imbedded in the Forum unit design.

Last year the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity. The Company's objective is to source 100% of its electricity needs from renewable energy by 2022 and continue to reduce carbon emissions across the entire product development and manufacturing process. The switch to buying green electricity started in 2014 and by 2018, 69% of the Company's electricity needs were met using renewable electricity compared with 37% in 2015.² The Company's ambition is to be fully renewable by 2022. Energy efficiencies are maximised in the Forum display unit, which allows for automatic adjustment of the screen resolution according to the location and the ambient light levels, thus reduce the energy required to operate the screen. Other sustainable measures applied to the unit design include the following.

- *Use of a powder coating without any volatile organic compounds (VOC).*
- *Electrical and electronic equipment recycled according to WEEE regulations.*
- *Unit mainly manufactured from sustainable and recyclable materials.*

² Part 4 Sustainability Aims and Objectives

Energy efficiency measures in the design and use of furniture, and the offset of carbon emissions are key components of the Company's strategy. Furthermore, as well as being powered by renewable energy, the digital advertising estate in Manchester will be maintained by JCDecaux Technicians driving electric vehicles, demonstrating the Company's focus on limiting carbon output and being a responsible partner for the City.

The Forum CIP

The Design

With new digital products being continuously developed across all environments, the Company plays an active role in shaping the City of Tomorrow and making the urban environment more functional and relevant for those who live, work and visit the City. Product design is guided by eco-design principles in addition to quality, unit aesthetics, functionality and environmental performance.

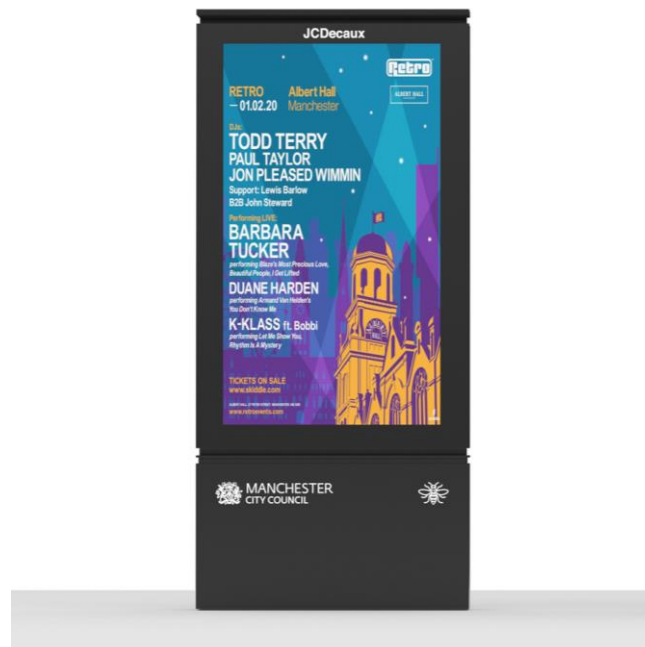
The Forum CIP unit for Manchester was designed by the architectural practice Fosters and Partners, with whom JCDecaux has collaborated over many years to create a unique suite of attractive and functional furniture. The Forum is a contemporary designed freestanding unit which is slender in profile, with integral best in class LCD screens manufactured by MRI in the USA. The materials used in the unit are of the highest quality and robust enough to withstand the elements and continue to look good for many years. The design is simple and understated and finished in a black powder coated exterior. The unit is floor mounted and in most cases on the same footprint as the existing structures they replace, with the advertisement orientated, as now, in portrait presentation. The Forum structure represents an innovative display platform that is future proofed with upgradeable technology within a structure that embodies the principles of sustainable development. The unit is entirely recyclable and devoid of hazardous materials.

The Screens

The LCD screen product used in the Forum unit is the result of more than 15 years of research to source the best available product that also meets the Company's exacting environmental standards. Each unit holds two LCD screens showing advertisements that are equal to the industry standard size known as a "6 sheet", which provides an advertising area of just under 2m². The existing advertisements on the MCC estate, other than the 17 column structures, are currently 6 sheet in size and were installed over the last 20 years under the earlier contract. This size of advertisement has long been considered an appropriate scale for the pedestrian environment and is typical of

advertising displays found in towns and Cities as freestanding roadside units or affixed to street furniture. The current method of displaying advertisements is limited to showing a single printed image, which needs to be manually replaced every two weeks with a different static creative. This process is costly both in time and energy, which is saved with the use of LCD screens. The use of modern methods of display enables an image to be automatically changed via a secure ISDN line, without the bi-monthly visit to each site or the reprinting of paper advertisements, which represents a 90% reduction in the number of scheduled visits made to each site every year. An additional benefit of this technology is in the ability to tailor the message in a seasonal or time sensitive manner.

The screens are fully programmable, which means they can be managed and controlled by a remote computer to, amongst other things, change the hours of operation, the screen brightness, and show a range of static images that include commercial, Council and community messaging.



Forum CIP Unit

The benefit of remote control over screen content also means that in an emergency all the screens, within a discrete area, or across the entire City can be used to show high threat/security/ safety warnings under strict protocol and agreement with MCC. In all cases the advertising images will automatically change with one image instantly replaced by another every 8-10 seconds.

The use of LCD screens represents a more sustainable form of roadside technology that is greener and cleaner than traditional fluorescent and incandescent lighting alternatives. The SmartScreen product incorporates Power Factor Correction (PFC) technology to maximize the efficiency of all power connections. The units are Restriction of Hazardous Substances (RoHS) approved and completely devoid of hazardous materials making it easier to recycle at end of life in accordance with the Waste Electrical and Electronic Equipment recycling (WEEE) directive (Europe) on the recycling of electrical and electronic waste. Application document Part 3 provides the detail on the two versions of the Forum CIP unit to be installed across the City, the only difference between them is the additional top section housing required for the Smart City technology, which relates only to those sites within Groups 1 and 2, which represent 25% of the estate. The rest of the estate will comprise the Forum CIP unit, which stands at 2.95m, as illustrated above and in Part 3 document. All of the CIP units, including the Smart City version, are the same in width and depth to appear identical across the entire MCC estate.

The Forum CIP unit has undergone rigorous testing in extreme conditions and boasts 13.5mm thick antivandal toughened safety laminated glass on all glazed surfaces. The other external surfaces have been treated with a nanotech treatment to enable easy removal of stickers and/or sprayed paint damage. The unit has a protection rating against impact of >IK10. All electrical circuitry is inaccessible to the public and the unit fixings are hidden and require specialist tools to enable access. The existing estate is illuminated directly, whereas the proposed screen is a high definition lead crystal display. Control over the level of luminance, that is the light output of the screens, is adjusted by an inbuilt light sensor that makes continual automatic adjustments and is limited to a maximum of 600Cdm² at nighttime³ and dimmed between 12:00am and 06:00am. The units will be powered using renewable/green energy, providing a 50-70% reduction in electricity consumption compared with traditional fluorescent and incandescent forms of lighting found in other forms of printed roadside displays.

Emergency Messaging

JCDecaux is committed to helping its partners ensure the safety of their environments, whether that be a public space or a major transport hub. As part of the CONNECT for Partners platform, MCC is able to use the Company's Emergency Messaging System, which is currently deployed in all Network Rail stations and at Heathrow Airport. The system allows for predefined and formally agreed messages to be displayed within

³ The maximum night time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals

minutes. Recent events have highlighted the potential need for transport authorities and local councils to be able to convey emergency messaging to the public quickly and effectively. JCDecaux has developed a proprietary system to facilitate this, which is available to MCC once the units are in place. OEMA is a JCDecaux web-based application that enables real time message broadcasting in response to specific emergency situations. MCC will have the control over the content of messages that can be displayed within seconds on single or a pre-grouped network of screens. The Emergency Messaging System is ISO 27001 certified with connections to each screen over a secure and private encrypted data network.

Legislative and Policy Framework

The Advertisement Regulations

Advertisement control in England is operated through the 2007 Regulations. The Regulations state that all advertisements, other than certain exempted classes, require consent before they can be lawfully displayed⁴. Consent may be granted expressly by a Local Planning Authority or the Secretary of State on appeal; or granted “deemed consent” by virtue of Regulation 6. Class 14 deemed consent relates to the continued display of an advertisement at the expiry of a period of express consent. Class 13 relates to advertising sites used continually for that purpose for ten years or longer. Both classes would ordinarily permit the changes now being proposed in these applications, except for the introduction of the sequential change capability, which is a material alteration in the manner of display. Express consent is therefore required to make the change in manner of use.

The 2007 Regulations exist pursuant to s220 of the Town and Country Planning Act 1990 and create a separate self-contained code that is apart from mainstream planning controls.

Regulation 3 states that;

- ‘1. A local planning authority shall exercise its powers under these Regulations in the interest of amenity and public safety, taking into account –
The provisions of the development plan, so far as they are material; and
Any other relevant factors*
- 2. Without prejudice to the generality of paragraph (1) (b)-
a Factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;
b Factors relevant to public safety include-
the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military); whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air’*

The impact on visual amenity is assessed in light of the character of an area, which includes the nature and type of surrounding land uses and the existing built form within the particular locality where the proposed advertisement is to be displayed. It is the

⁴ Regulation 4 of the Town and Country Planning (Control of Advertisements)00009-7-908906907909-76(England) Regulations 2007/783

impact upon local character and any particular feature of interest that the proposed advertisement is appraised.

As to public safety the primary consideration is the effect of an advertisement display on drivers and pedestrians seeing the advertisement in the particular location. It is accepted that advertising is intended to be seen as it is a visible media, but it doesn't automatically follow that roadside advertisements are distracting. Advertising is often part of the fabric of City Centres and busy routes where drivers and pedestrians have a high expectation of seeing commercial images and messaging. Manchester City Centre is an example where the vibrancy and activity of the City retail core.

National Policy Guidance

The Government's approach to development management is set out in the **National Planning Policy Framework (NPPF)** issued in July 2019. The guidance must be considered in preparing local plan policy and is a material consideration in planning decisions. The NPPF places the principle of sustainable development at the heart of the planning system and identifies three pillars that touch on the way the planning system is expected to achieve sustainable development, which are economic, social and environmental impact. The NPPF also applies a presumption in favour of development that can assist in meeting the sustainability aims.

Paragraph 67 of the NPPF relates to advertising and superseded the more comprehensive advice contained within guidance PPG19. The advice on advertisements states that;

"Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts."

Advertising is seen as performing an important role in a diverse and vibrant market economy in encouraging consumer confidence and spending, which contributes to sustainable economic growth. Specific guidance relating to advertising developments and on the interpretation of the Regulations is contained within the Communities and Local Government **Planning Practice Guidance** ("PPG"), which sets out the current guidance on this subject. Section 8 of the PPG explains in greater detail the criteria for

considering amenity issues in advertising proposals. More specifically, on the matter of scale the guidance suggests that advertisements should respect the scale of the surroundings

“for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features.”

It further advises that;

“This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.”

Improving the quality of the environment is also one of the fundamental principles of the framework. The physical elements of the proposal are arguably indivisible from the use, particularly in light of the provisions of s222 of the Act⁵. It is therefore material for the consideration of merit, to include an assessment of the improvement in the quality and appearance of the proposed structure, which is a fundamental part of the whole scheme. The NPPF states that;

“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life including (but not limited to): replacing poor design with better design...”

Furthermore that:

“In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”

On the ability of good quality design to make a positive contribution to the environment the framework affirms that;

“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.”

⁵ S222 of the TCP Act 1990 grants deemed planning permission for operation works associated and required through the grant of express advertisement consent under the Advertisement Regulations

Core planning principles in the NPPF which are relevant to the appeal proposals include, amongst other criteria, the advice that the planning process should;

*“ not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;”*

Under these and other core principles the Framework suggests that decisions should follow the following approach;

“Planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;*
- and are visually attractive as a result of good architecture and appropriate landscaping.*

Section 12 of the (NPPF) deals with the consideration of cultural heritage assets and sets out the importance of being able to assess the impact of a development on the significance of heritage assets. Significance is defined in Annex 2 as the value of an asset because of its heritage interest. This interest may be archaeological, architectural, artistic or historic and can extend to its setting. The setting of a heritage asset is defined in Annex 2 as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. A designated heritage asset is recognised by the NPPF to be a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

The NPPF recognises that a balance needs to be struck between the preservation of the significance of a heritage asset and delivering public benefit. The more important the asset, the greater the weight should be on its conservation however distinction is drawn between those assets of highest significance and those of a lesser significance. Paragraph 133 states that where the proposal would lead to substantial harm to the significance of a designated asset consent should be refused unless the harm or loss is necessary to achieve substantial public benefit that outweighs that harm. In cases

where less than substantial harm to the significance of a designated asset is anticipated and should be weighed against the public benefits of the proposal.

Local Policy

Two Development Management policies from the Manchester Local Plan are relevant to the Proposal.

DC 15 Advertisements Hoardings and Posters

This Policy repeats in substance the material considerations set out in the 2007 Advertising Regulations. The dual criteria of visual amenity and public safety are recognized, as is the requirement for advertising schemes to respect their context and the scale of built form within the general locality. The 6 sheet advertisements on the CIP unit is a standard size of display often found within pedestrian areas and retail streets. The Proposal sites are located away from sensitive aspects to parts of the City where the presence of roadside street level commercial images is commonplace.

DC 22 Footpath Protection

This policy is intended to ensure that all new development is assessed in terms of the impact upon existing routes and the free movement of pedestrians around the City. The Proposal accords with this policy in several respects. The develop proposal does not introduce any new sites, rather the upgrade and improvement to existing advertised locations across the City. In the case of the 17 application sites currently occupied by tall column structures, the replacement Forum CIP unit is considerably smaller in mass and scale and consequently occupies a much smaller footprint and less of the public pavement. The replacement in those instances will result in the reinstatement of the footpath, which will have a beneficial effect on pedestrian movements and release areas that are currently occupied by fixed apparatus.

In terms of the existing locations that are being updated, the difference between the footprint of the old-style unit compared to the Forum CIP unit is insignificant. The Forum CIP unit has a slender profile and occupies the same area of pavement at less than 0.4m². All of the application sites have been reassessed by the City Council's Highway officers in line with the current standards, which, in all but 4 instances, are considered to remain acceptable in safety terms. In all cases the pavement widths are generous and capable of accommodating the replacement Forum CIP unit without harming free movement or restricting pavement space.

One issue not covered by the Policy but raised in the Pre-App discussion was the standard of remediation and reinstatement of the public footpath associated with the removals, new installation and altered foundations. It is understood that the quality of reinstatement work by Statutory Undertakers can vary and has been an issue in the past. The Company is fully committed to ensuring the quality of all out installations are exemplary and have worked closely with other Highway Authorities in the UK to maintain a high standard of workmanship. Attached at Part 5 of the application documents show examples of recent reinstatement works following the installation of a unit foundation. These images illustrate the commitment to ensuring all reinstatement work is undertaken to the highest standards in workmanship and materials.

The proposed development would be consistent with both national and local policies regarding advertisement control, including local policy.

Planning Considerations

The applications for this Group of unit installations are submitted under the provisions of the 2007 Advertisement Regulations and relate to the display of advertisements. As such, the primary considerations relate to the impact of the advertisement on visual amenity and public safety, as laid out in the Regulations. The advertisement comprises two LCD screens, back to back on a single structure and showing illuminated images that automatic change by means of a remote server. The lighting level of the screen adjusts to ambient levels during the daytime and are pre-set to ILP maximum levels during the hours of darkness. Should the unit malfunction the screen will switch off and automatically alert the Digital team of the fault.

Each of the application sites are existing advertised location and been used for that purpose for several decades. All of the existing advertisements comprise illuminated displays that are 6 sheet in size or larger and the replacement units will continue to be 6 sheet in dimension. In light of the existing advertising use and scale of displays at the application sites and the provisions under the Regulations, the considerations are narrowly confined to the impact the change in technology would have on the character and appearance of the area and on public safety.

The size of advertisement and its positioning within the context of the Core City centre locations has, to a great extent, been established as acceptable for each site location, which were all subject to detailed consideration by the City Council when initially granted express consent. The consents affirm that the scale, position and orientation of the advertisements would not be against the interests of visual amenity or public safety

within the context of the site. The primary difference between the current and proposed advertisements therefore relates to the change in technology, the type of advertisements being shown, and the additional height of the unit required to house the Smart City technology. Of the 12 sites within Group 4 three fall within defined conservation area boundaries, therefore the assessment considers what effect the change in unit size and type is likely to have on character and appearance.

Amenity

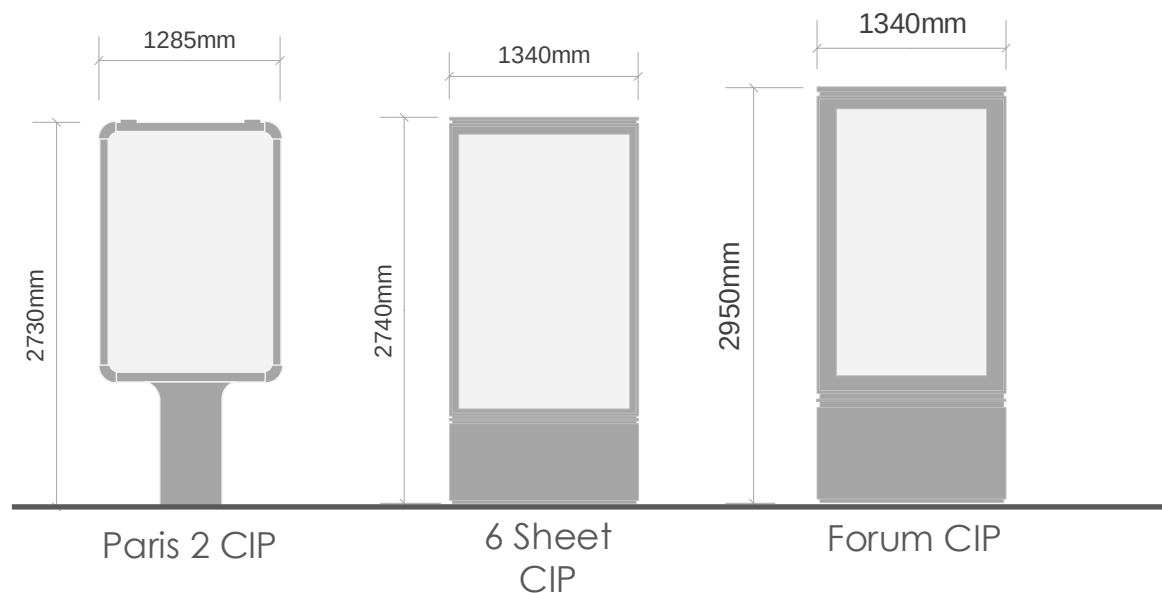
Amenity considerations concern the effect of development on the character of a local area, which is often experienced through the mix and type of land uses and buildings that form the townscape. In the case of the current application sites the character is comparable, as each is located within the same or very similar context of the Core City centre. The Core of Manchester is a vibrant urban setting and busy with pedestrians and vehicular traffic throughout the day and nighttime. The Core centre streets includes active commercial frontages to large scale commercial premises of a range in age and architecture, which contribute to local character. Policy guidance requires proposals to have regard to the general characteristics of an area in advertising proposals and is generally supportive of advertising within retail and commercial areas where it can positively contribute to vitality and place.

JCDecaux has built its reputation on delivering innovative, attractive concepts by calling upon a wide range of experts. JCDecaux has worked with over 50 world-famous architects and designers on projects in cities across the world. These include: Gae Aulenti in Turin, Robert Stern in Chicago, Jean-Michel Wilmotte in West Hollywood and Lord Norman Foster in the UK. Street furniture can be found in cities from San Francisco to Paris and Sydney from leading names such as Philippe Starck, Mario Bellini, Philippe Cox, Patrick Jouin, Knud Holscher, Martin Szekely, Peter Eisenman, Christophe Pillet, Mathieu Lehanneur or Marc Aurel. The Company therefore embraces the notion that street furniture can contribute to improving the quality of the street and make them safer, cared for and attractive. The streets within Central Manchester are busy, mixed use thoroughfares with a pronounced commercial presence, with many large-scale commercial premises lining the streets, together with other forms of roadside advertisement. Manchester is an important historic City with many striking individual buildings and unique City enclaves where development needs to be carefully considered, thoughtful and respectful of the architectural and historic heritage.

The scale of buildings and character of the City Centre is varied, ranging from substantial commercial retail and office buildings to small scale shop premises. An

element of residential use is also a feature of the City Centre, although typically confined to upper floors. Each of the application sites are located within this visual context and are already advertised locations, therefore the amenity assessment is based more on the relative change in structure and advertising presentation than the principle of advertising in the context of the site. The Forum CIP unit is unquestionably a modern item of furniture, yet it has been designed to be simple and understated so as not to overwhelm the space. The choice of a black sheen powder coated finish further permits the structure to be subsumed within the milieu of the street, to have a negligible impact upon the character and appearance of the City. The size of the display is confined to that of a standard 6 sheet advertisement, which is a common feature of a City centres and often used to promote consumer products and retailers to the retail function.

The scale and proportions of the proposed advertisement is therefore designed to be at a human scale without overwhelming passers-by. The relative difference between the existing units in Group 4 and the Forum CIP unit replacement is negligible, see below illustration.



The Forum CIP unit is marginally taller; however, the extent of advertising display will not change. All of the replacement Forum CIP units in Group 4 will be identical in form and display, thus recreating a single style and recognisable aesthetic across the City that identifies each unit as being part of a citywide network provided by MCC.

The application Sites within this Group are confined to a network in the busiest and most vibrant parts of the Core City centre, as illustrated in the Part 1 document. The locations are mainly sited away from high value heritage assets to areas where the immediate local context is not sensitive and can accept this type of modern structure without harming important views or historic settings. The main street frontages to nearby buildings are, despite their age and importance, active and modern looking shop fronts and on busy street thoroughfares.

The proposals do not seek to add more furniture to the street, all the sites under application are existing items of street furniture. The change in the unit design and technology does not fundamentally alter the type of use, only the way in which it is achieved. All developments need to be sited with sensitivity and respect their surroundings particularly when the setting has historic significance. Respect for heritage does not however equate to a prohibition on development. Areas are subject to change and evolution and can adapt to such change without loss of character or degradation in appearance, provided development is sensitive to context and sets the highest standards of design.

The proposed change in the method of display should not cause any adverse effect on visual amenity as it will maintain the same overall scale of advertisement (except for the two sites where the existing structure is reduced), location or position of the existing advertisements. The advertisements form part of a modern freestanding structure and replaces an existing item of the same scale or greater. There can be no suggestion therefore that visual clutter would result as no additional furniture is proposed. The change in the method of advertisement display would represent a relatively minor alteration to the street scene and one that would be visually neutral in impact. Independent of the evident improvement in the unit design and functions, the ability to restrict the nature of the advertising use through conditions has the potential to benefit visual amenity through limiting the hours of operation and lighting levels for each site.

The advertisements are intended to be visible, however they serve as complementing features of the urban street without appearing intrusive or out of place. One of the main aims of policy is to ensure a high quality of design and conformity with the general principle of safeguarding amenity and public safety as contained within national guidance. Overall the Proposal would accord with policy guidance and will not harm local visual amenity.

Impact on the Conservation Area

Three of the 12 application sites in Group 4 are located within the boundaries of a designated conservation area. Their positions and immediate context however make them suitable for upgrade without harming character or appearance. Conservation area designation does not mean an area of special control over advertising, which is likely due to the recognition that many commercial centres are so designated yet are vibrant retail environments. As such, advertising and commercial endeavours is part of the areas character and although not prohibited, needs to be sympathetically positioned to ensure the size and nature of the display is compatible with its surroundings. Manchester City centre, like many other World Cities, includes an eclectic mix of uses and buildings, some historic, some less so, but together create a character and appearance that is unique to the City. The individual sites may differ however all share the immediate visual context and backdrop of active commercial frontages, rather than green spaces or residential buildings of townscape value. The sites are also existing illuminated roadside displays, therefore the change in format and unit design preserved and to a great enhances the character through these modern interventions. Overall it is considered that the proposals will have a neutral impact on the heritage value of Manchester.

Public Safety

Public safety issues are concerned with the effect an advertisement would have on drivers and pedestrians and whether the position of the advertisement or the manner of its display is likely to be so distracting or confusing as to endanger the public. It is clear that outdoor advertising is designed to be seen and is typically found within commercial settings amongst other forms of prominent advertisements or retail operations. Within commercial contexts and alongside busy streets, such as the centre of Manchester, there is a heightened awareness and expectation of seeing commercial images without them appearing unusual, out of place or distracting.

The advertising displays on the Forum CIP unit are elevated by 750mm above the pavement and intended to be visible principally to pedestrians, although some displays outside of the pedestrianized areas may be visible, albeit obliquely, to passing vehicular traffic. As mentioned earlier the character and setting for each location is overwhelmingly commercial, with brightly lit shop fronts and other premises forming the immediate backdrop. The prominence of the sites will provide ample opportunity for people to see the simple messages on display. The same is true for those advertisements that are visible to drivers, who will see the displays alongside busy

active street frontages and so are less likely to be distracted when viewed in this context. Furthermore, where sites adjoin a road, the traffic is low speed and nature of the road doesn't place a burden on a driver's concentration.

The application sites are existing and established advertised locations, where illuminated advertisements have been a feature for several decades, without incident or accident as a result. The upgrade in the units to the modern Forum CIP unit with LCD screens in place of backlit printed images will not significantly change the effect of the display in safety terms. Only static advertisement will be shown on the units within this Group. The planned CIP unit for Manchester is designed to create a consistent look and quality standard across the entire estate. The application site locations and position has been the subject of pre-application consultation with the Council's Highways Department to ensure they remain appropriate, suitable and sufficiently distanced from road edges so as not to present a danger to drivers.

In terms of the impact of the proposed CIP's on pedestrian movement and safety, this too has been reflected in the unit positioning and in some instances minor adjustments in positioning are proposed, in light of MCC Highway comments, to improve on the current position. It is considered, in light of the local context and existing level of activity in the Core City centre, that the proposed change of display structure and alteration in the method of display will not be against the interests of public safety.

The proposed development would be consistent with both national and local policies regarding advertisement control, including the City Council's local plan policy. The investment in modern, cleaner and greener technology is a progressive approach that creates a positive impression of the City and embraces sustainable development through exciting and new media formats.

Summary

The proposed developments will see the overall improvement in the quality and design of the advertising structures on the City Council's estate and provide better functional furniture. The importance of improving the design and purpose of essential items of street furniture is recognised as helping to transform the quality of our public spaces for the benefit of people living, investing, visiting and working in Manchester. The replacement Forum CIP is a better-quality modern unit that will improve the look and appearance of the street and surroundings without harming local character. The design embodies simple clean lines and understated form to respect the more sensitive locations within the City. Overall it is considered that these proposals will make a

positive contribute to Manchester by introducing high quality, visually attractive and functional smart furniture, to support Manchester to become a World class regional capital City.

I trust that the above and enclosed documents clearly explain the nature of the proposals but please call me if there are any further matters on which you need clarification.

Yours sincerely,



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Application Documents

- Part 1 Group 4 Unit Distribution
- Part 2 Site Plan and Image
- Part 3 Forum CIP Unit Detail
- Part 4 Sustainability Aims and Achievements
- Part 5 Pavement Remediation

Group 4 Site List

GROUP 4 - CORE - CIP UNIT

SITE NO	ADDRESS	Detail	PO
1	LEVER ST IFO 19	30 M AFT BACK PICCADILLY	M1 1BY
2	NEWTON ST OPP 25	JUNCT DALE ST	M1 1FZ
3	MOSLEY ST	20 M AFT PARKER STREET	M1 4AH
4	PARKER ST, PICCADILLY	10 M BEF PORTLAND ST	M1 1RG
5	PORTLAND ST	OPP AYTOUN ST	M1 1RN
6	PICCADILLY IFO 111	2 M BEF LENA ST	M1 2HY
7	PICCADILLY	28 M BEF DUCIE ST	M1 2PL
8	PICADILLY	13 M AFT GORE ST	M1 3AY
9	AYTOUN ST OPP 31	10 M AFT AUBURN ST	M1 3BG
10	LONDON RD OPP 14	50M AFT DUCIE STREET	M1 3BG
11	PORTLAND ST	15 M BEF PARKER ST	M1 3HU
12	PORTLAND ST IFO 35/47	2 M AFT MINSHULL ST	M1 3HU
13	PORTLAND ST OPP 35/47	JUNCT WITH YORK ST	M1 3LA
14	MOSLEY ST IFO 6/8	30 M AFT & OPP PARKER ST	M2 3AN
15	BOOTH ST IFO 32	10 M AFT WEST MOSLEY ST	M2 4AB