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BY PLANNING PORTAL

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

29292/A5
18th September 2020

Dear Sir/Madam,

Town and Country Planning (Control of Advertisements) (England) Regulations 2007
Conversion of poster advertisement display at 71 Wellington Street, Manchester

Please find enclosed an application for advertisement consent to upgrade an established paper and paste advertising display to a modern digital format capable of being operated from a central location without the need to visit each site individually.

This is part of an industry wide drive to modernise and upgrade advertising infrastructure to meet modern requirements. It is proposed to replace the existing advertising display on a like for like basis, using new display technology that is lightweight, durable, efficient, and can be easily erected, as it is of similar size and scale to the existing unit.

The Proposal

The proposal seeks to update two out four existing advertisement displays at 71 Wellington Street with a digital equivalent which will display static advertisements on rotation. The remaining two displays will be removed. The display located to the north of the site will remain in the same position and orientation, whilst the southern display will have a slight change in orientation to aid viewing for road users travelling north along Wellington Road.

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 more creative real time and locally relevant advertising;
- Opportunity to integrate additional hardware to meet Smart City objectives.

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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 and resolve the majority of issues remotely.

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*. Please note that the guidance distinguishes between daytime and night time illuminance, with a limit of 5,000cd/m2 applied during the daytime. The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the poster being replaced. Whilst the ILP guidelines will represent the upper limit, the actual level of illuminance in all likelihood will be well below this.

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;
- Maximum level of night time illuminance to be set to 300cd/m2 in accordance with ILP Guidelines;
- Advertisements to change no more frequently than once every ten 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).

The Site

The proposal site is located at the junction of Wellington Street, Garratt Way and Cross Lane and supports four externally illuminated billboards. The site is located within Gorton District Centre, as defined by Manchester Local Development Framework Interactive Map, therefore the surroundings are predominantly retail and commercial use, with residential uses in the wider surrounding area.

The proposal site is located within Flood Zone 1. There are no other constraints, the site is not within a conservation area or the setting of a listed building.

The proposal site is an established location for advertising, having supported four externally illuminated billboards for at least 12 years, as demonstrated in Appendix 1. As the size and nature of the advertisement has not altered in over ten years the signage benefits from deemed consent under Class 13(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

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 2019 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 132 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.

Planning Considerations

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 would require express advertisement consent. The impact of these alterations has been considered in amenity and public safety terms as follows:

Amenity

On a strategic level the digitisation of the advertising network will see an overall reduction in the number of advertising sites in the area. There will also be a reduction of advertising sites on the proposal site, as the digitalisation of two of the displays is efficient enough to enable the removal of the two remaining displays.

As the proposal seeks to replicate the existing advert and therefore mimic the existing situation, there will be minimal impact on the visual amenity of the surroundings. The size and positioning of the advertisement will remain the same and the level of illumination will reflect local and ambient conditions, with little material change to the site as it currently exists.

The controls proposed over the level of luminance at night are in line with the ILP Guidelines and industry best practice and will ensure that the proposed display does not cause any material harm to amenity. The context of the surroundings, including illuminated shop signage, other illuminated adverts and street lighting establishes the site as appropriate for an illuminated advert of this type. Additional controls over the display will be considered if necessary to remedy a specific amenity concern.

The proposal would not be detrimental in either an immediate or wider sense. It is not within a conservation area, attached or adjacent to a listed building, or within proximity of any local heritage assets.

As the site is located within Gorton District Centre, the character and setting of the site, street scene and surrounding areas is predominantly retail and commercial uses. However, there are first floor residential also within close proximity to the Site, on the opposite side of the road junction.

The advertisement displays can be viewed by road users travelling northwards and southwards on Wellington Street and eastwards on Garratt Way, however are set back from the junction and therefore not in direct eyeline, The proposal would not amount to clutter or contribute to any cumulative impacts, sitting comfortably in its visual context without harming amenity, the qualities of the site, or the character and 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 an 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 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. However 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 display would occupy the same setback and offset position as the existing unit, ensuring site lines and visibility splays are maintained. It would be seen by traffic travelling north and south on Wellington Street and east on Garratt way, which is limited to 20mph, is well lit, straight, level, and has excellent forward visibility. Highway users would therefore by fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead. The cognitive demand on road users at this point is low as there are no unusual highway complexities which would require extra care to be taken. As such, drivers would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Under these circumstances, such a familiar feature of the Wellington Street and 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 proposal seeks to update two out four existing advertisement displays at 71 Wellington Street with a digital equivalent which will display static advertisements on rotation. The remaining two displays will be removed.

The display located to the north of the site will remain in the same position and orientation, whilst the southern display will have a slight change in orientation. The proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no additional harm to amenity or road safety.

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

Application Submission

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

- Completed application forms prepared by Barton Willmore;
- Letter Statement prepared by Barton Willmore (this letter);
- 7937_01 Site Location Plan
- 7937_02 Existing Site Plan
- 7937_03 Proposed Site Plan
- 7937_04 Elevation AA
- 7937_05 Specification

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.

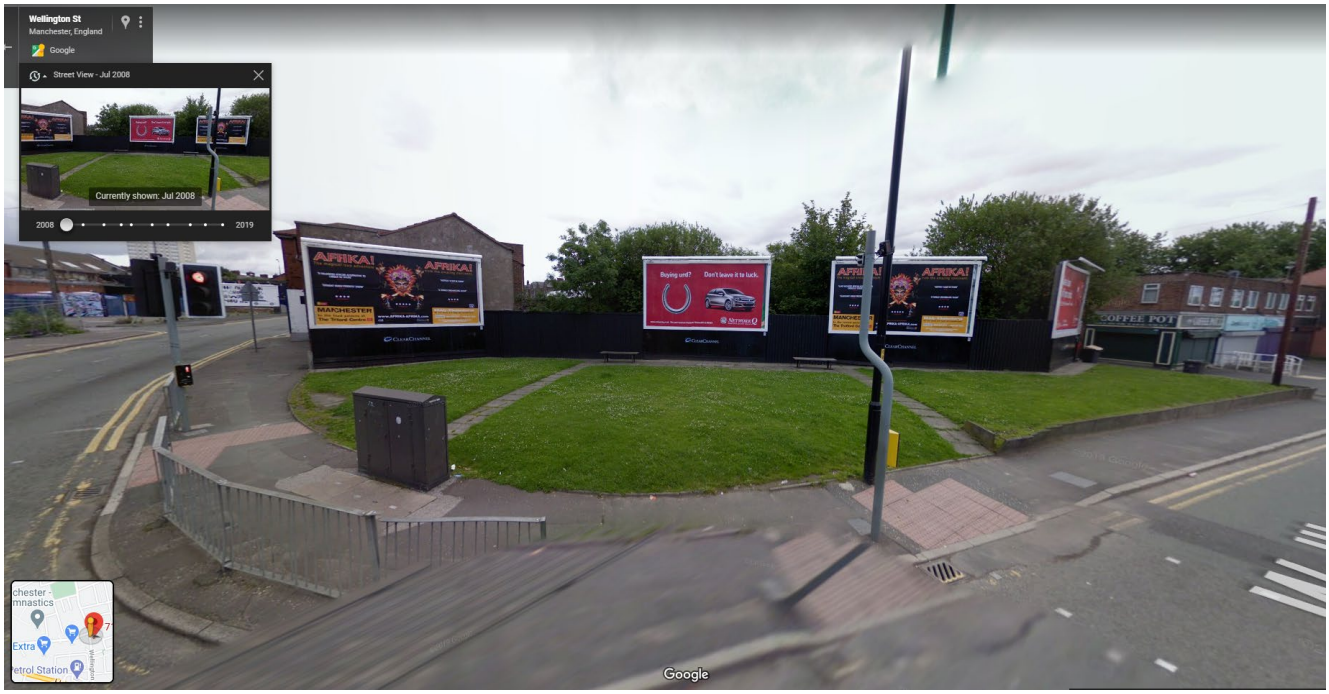
Yours faithfully,



DAN INGRAM
Senior Planner

Appendix 1

July 2008



July 2014



July 2019


69 Wellington St
Manchester, England
Google
Street View - Jul 2019
Currently shown: Jul 2019
2008
2019
Extra
Google