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Planning Department
Manchester City Council
Town Hall Extension
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Date: 17 September 2020
Our ref: 16647/01/NG/AVi/18804878v1
Your ref: PP-09074775

Dear Sir/Madam,

Application for Advertisement Consent at Land to the East Side of Pottery Lane, Manchester M12 5DD – Conversion of poster advertisement display to D-Poster

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 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 "repost" an existing display at the site with a D-Poster which will display multiple static advertisements on rotation.

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;

Registered in England No. 2778116
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- 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.

In most instances the re-posting of a D-Poster can be achieved at a similar speed to traditional posting, with minimal structural work and the existing 150mm frames repaired or replaced and painted black.

In order to ensure that the nature of the advertisement does not substantially or materially change, it is proposed to control its operation via condition. Suggested conditions include:

- 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.

The above conditions are industry standard and are now commonly seen applied to applications of this type. Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant.

It should be noted that the appropriate level of illuminance for digital signage varies depending on the level of ambient light in the surroundings. The Institute of Lighting Professionals (ILP) guidelines set a night time limit at which the display will not cause glare to drivers and will be appropriate within in an urban or suburban character area (300cd/m2). 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 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 imperative to ensure that upgraded sites are not over illuminated.

The Site

The Site is located on the eastern side of Pottery Lane (A6010), which forms part of the Manchester Intermediate Ring Road, and is comprised of a free-standing double width illuminated billboard. The proposed D-Poster will be erected to replace the billboard that is currently in situ and will be half the width of the existing sign.

The proposal site is not located in close proximity to any nationally or locally listed heritage assets and is not located within a conservation area. The site does not directly face any residential properties and overlooks a car park for a self-storage unit which currently houses several containers.

The proposal site is an established location for advertising, having supported the billboards for over 10 years. 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.

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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 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 Development Plan for the area consists of the adopted Manchester Core Strategy (2012-2027), Manchester proposals map, extant Unitary Development Policies ('UDP') and supplementary planning documents ('SPDs'). The Core Strategy does not contain any policies in relation to advertisements. The UDP contains development control policies DC15.1, DC15.2 an DC15.3 which are relevant to advertisements, hoardings and posters. Policy DC15.1 identifies that applications for advertisements should be considered only in the interests of amenity and public safety, and states that the Council will take account of the following matters in assessing these interests:

a the general location of the proposed development and the effect on visual amenity;

b the scope for posters and hoardings to make a positive contribution to the locality;

c the design of the structures, and the relationship with any premises on which they are located;

d the effect of the proposal on permanent redevelopment of the land;

e public safety resulting from the positioning of the design of the display;

f the ease with which the structure is capable of being satisfactorily maintained;

g the use of hoardings to screen vacant sites or buildings during development, or where development is known to be imminent;

h the use of hoardings as part of a scheme to prevent access by unauthorised users onto land pending development;

i the use of hoardings to disguise or improve the appearance of unsightly features, operations or activities; and

j the number of advertisements in the locality and their cumulative effect on visual amenity.

Policy DC15.2 continues that in assessing the interests of amenity and safety the Council will take account of the following criteria:

a developments of this kind should not harm the character or architectural features of a building, nor interfere with its proper use;

b they should be in scale with the locality and relate properly to the site on which they stand;

c they should be unobtrusive and should not intrude into residential neighbourhoods and areas of high amenity value; and

d a proposal which would be injurious to public safety or adversely affect the flow of traffic, by reason of its position, size, or design will not be permitted.

Planning Considerations

The like for like replacement of the display and the control over operation seeks to ensure that the change in the visual impact of the site on the surroundings is de minimus and not material. Nevertheless, it is acknowledged by the applicant that the means of illumination and the potential to increase the rate of change of the adverts would require express advertisement consent. The impact of these alterations have been considered in amenity and public safety terms, and in the context of Development Plan policies, as follows:

Amenity

As the proposal seeks to "repost" the existing advert and therefore mimic the existing situation, there will be minimal impact on visual amenity during the daytime. The positioning of the advertisement will remain the same and the level of illumination will be set to ensure that the proposed advertisement is not materially different from the existing position. The side by side comparison on the specification sheet provided with the planning drawings helps to illustrate the minimal difference between the existing type of display and the proposed replacement once controls are put in place.

The controls proposed over the level of luminance at will ensure that there would be no harm to amenity. The context of the surroundings, including other billboards 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.

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.

Conclusion

The proposal will not change the position or orientation of the advert and will reduce the size of the existing advert. As such the established acceptability of the advertisement should not change materially. 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 complies with local policies and should be granted consent.

Application Submission

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

- Completed application forms prepared by Lichfields;
- Letter Statement prepared by Lichfields (this letter);
- Drawings as follows:
  - 0203_5208 ¦ PA ¦ 01 Site Location Plan

- 0203_5208 ¦ PA ¦ 02 Existing Site Plan
- 0203_5208 ¦ PA ¦ 03 Proposed Site Plan
- 0203_5208 ¦ PA ¦ 04 Existing and Proposed Elevations

- 'D'-Poster Information Sheet

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



Anna Vincent
Planner