JCDecaux

Head of Planning
Chief Executive's Department
Manchester City Council
PO Box 532
Manchester
M60 2LA

11 April 2012

F.A.O. Julie Roscoe

Our Ref A00781

Dear Madam,

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

Re: Freestanding Display Structure with LED Screens at Armstrong House Oxford Road Manchester M1 7ED

Please find enclosed an application for advertising consent to erect a freestanding tower structure incorporating LED lit advertisement signs on land within the boundary of Armstrong House to the north of the elevated Mancunian Way Manchester, in accordance with the details attached to the application form.

The application comprises the following documents;

- Regulation 9 application for advertisement consent
- OS plan of application site No A00781/01
- OS plan and Site Photos No A00781/02
- Aerial View of the Application Site and Area No A00781/03
- Elevation plan of Totem Structure No A00781/04
- Photomontage images No A00781/05
- Letter from David Crowther, Bruntwood Estates
- DanPal Brochure on Light Architecture product
- LED manufacturers specification detail

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Application Background

This application is one of three separate proposals submitted by JCDecaux on behalf of our client Bruntwood Estates, relating to the development of new advertising locations on four sites in the City. Bruntwood Estates is a privately owned commercial property company specialising in the provision of high quality office space, serviced offices, meeting facilities and other commercial buildings. As such the Company owns or controls an extensive range of commercial holdings across the City. Although a nationwide Company, Bruntwood Estates has a close connection with Manchester and plays an integral supporting role in the commercial and business economy of the City.

Bruntwood Estates has over the last year worked in partnership with JCDecaux to identify and develop a limited number of iconic and innovative advertising proposals. I enclose a letter from Peter Crowther, the Development Director for Bruntwood, who has been actively involved in the project and supportive of the current proposals. The locations have been chosen in light of their commercial setting and the scale of surrounding buildings, which is consistent with the advice in local and national policy guidance. The three locations being developed by JCDecaux are the subject of related but separate applications. They are:

- City Tower Piccadilly Plaza
- **Armstrong House MTC Oxford Road, and**
- Oxford House Oxford Road.

The second of these locations is the subject of this application.

The partnership with Bruntwood Estates creates a unique opportunity to develop a number of contemporary and innovative advertising displays on primary locations within Manchester. JCDecaux have been at the forefront of development in the outdoor media, with extensive experience of creating some of the most inventive and striking advertising sites across the Country in road, rail, retail and airport environments. In all developments the Company's aim is to secure the best locations and to set the highest standards in build quality,

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design and innovation. JCDecaux has pioneered the use of modern technologies in the outdoor media road side environment and fully embrace the drive for greater efficiency and sustainability across the industry.

LED Technology

The advertisements proposed in this and other locations on the Bruntwood Estate will utilise the latest technology in the form of low energy LED back lighting and screen displays. Modern digital formats are redefining the advertising media, not just the roadside environment. The Company supports the aim of ensuring a future sustainable approach to the media to meet changing commercial and consumer needs. The environmental benefits of LED technology are clear not only in the reduced demand for energy to post and light the advertisements but also in eliminating the need to recycle waste material. Our own research consistently indicates a 50-70% reduction in electricity consumption. LED lighting is also a much cleaner form of display methodology with a 2/3 reduction in carbon emissions compared with traditional fluorescent and incandescent lighting.

LED modules have a longer life and are easier and cleaner to recycle and dispose of. The reduction in consumption is due in large part to the ability of LED's to light in one direction rather than the more wasteful 360^{O} light spillage found in other forms of illumination. The transition to digital forms of advertising also eliminates the need to print vinyl 'skins', which are ordinarily replaced and recycled every two weeks on traditional back lit formats. Digital technology provides enhanced flexibility and functionality that enables an image or message to be displayed instantly via a computer feed. The displayed images offer far superior definition, which generate clearer crisper images, comparable in quality to the advertising images found on television and in publications.

The proposed sites identified in our client's portfolio are the type of prime locations that merit the investment to create iconic and inspiring advertisement developments that enhance local character and symbolize the aspirations of the City.

JCDecaux UK Limited Registered Office 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number 1679670
Telephone +44 (0)20 8326 7777 – Fax +44 (0)20 8326 7775 – www.jcdecaux.co.uk

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Application Site & Surroundings

Armstrong House

The application site is located to the south of the City adjacent to the A57 Mancunian Way. The land is within the car parking area attached to Armstrong House, a four storey office building which forms part of the Manchester Technology Centre on Oxford Road. The application site itself, which has an area of approximately 60m^2, is positioned beneath the physical structures of the elevated Mancunian Way and the redundant northern slip road to the A34. The area is characterized by educational and commercial uses and large scale buildings. Overall the area is one where this type of advertising proposal would be appropriate in terms of scale and use. The use of high tech visual displays is also consistent with the predominant local industry.

Application Detail

The proposal is to erect an architecturally designed freestanding display structure incorporating two portrait orientated LED screens. The screens will be perpendicular to the road and orientated to face east and west at a height visible to drivers on Mancunian Way. Each screen will have a maximum illuminance that does not exceed 3500 Nitts/m² but will be controlled by light sensors to vary the brightness of the screens according to the brightness of the day, a measure recommended by Highway Services in other similar proposals and necessary to make the screens visible during the day. The illuminance of the screens will then be reduced to 10% of maximum capacity between dusk and dawn reducing the visual impact of the advertisements at night-time. The light sensors will ensure that the level of illuminance of the displayed image is sensitive to daylight and seasonal changes.

The proposed structure will create a unique landmark building that will enliven the street scene and provide a building that creates visual interest and an innovative entrance marker to the City. The structure will form a slender monolith, but due to the chosen external treatment will not present a solid form as stone, steel or concrete buildings tend to do. The structure will comprise flat façades angled at the rear to create a wedge shaped section in plan form. The structure will stand at 21m high, with approximately half of the structure hidden from view beneath the unprepossessing road infrastructure. The structure will

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be fabricated with a steel internal frame that is accessed and when necessary serviced via a fixed ladder system. The exterior of the building will be finished in a series of semi-translucent acrylic panels to diffuse the light but allow light to pass through the structure. The panels will be manufactured by Danpalon® to create a light, semi-transparent quality and coloured effect which is visually unique and striking.

The east and west facing façades of the structure will incorporate an integrated screen used to display the advertising images. The screens will be positioned at an elevated height of 11m above street level. The overall building height will be 21m and 6.2m as its widest and just over 3.6m in profile. The structure will be set against the backdrop of tall buildings that punctuate the skyline along the elevated Mancunian Way. The new structures height will be subordinate in scale to other visible developments and viewed within the wider context of the commercial aspect of the City. The existing scale of built form will ensure that the proposed structure will not dominate views but be appropriate to this environment. The servicing of the display sign and maintenance of the structure will take place from within, with the building being accessed via a rear door.

Overall, it is considered that the proposal would appear as an inspiring modern addition to the townscape that will not harm visual amenity but enhance the local character. It is anticipated that the clean lines of the structure will quickly become part of the landscape and valued as an interesting and attractive urban form.

The installation of such an iconic structure utilising modern technology and innovate materials in its construction will reinforce the City's objective of promoting new technology and encouraging development that improves the perception and image of the City. Permitted LED displays elsewhere along Mancunian Way, at Piccadilly Plaza, City Gateway Tower, the Axis Tower at Albion Wharf, the Triangle Centre and the Printworks contribute to creating a progressive image of the City and a centre for innovation in the outdoor media.

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Display Content

The technology used in the screens will provide the functionality and level of control that would enable a range of advertisement images to be displayed.

Principally the images on the screens will advertise commercial products; however the technology will provide the flexibility to display a range of information including more locally based messages. The Company has for many years provided advertising space for charitable organisations to create a level of exposure that would otherwise be cost prohibitive. Each year the Company makes available 10% of all advertising space to our chosen charities, which this year is Macmillan Cancer Support and the NSPCC. Digital formats have also provided a platform for annual charity campaigns such as the Poppy Appeal and Children in Need. The Company is proud of its role in supporting national and local charities and their work with local communities. As part of our contract with Bruntwood Estates, they intend to use the screen each year to promote their own sponsored charity. It is also anticipated that the screen will be made available and used to promote council initiatives, local charitable campaigns and emergency safety information.

The proposed advertisement complies with the Standard Conditions set out in Schedule 2 of the Town and Country Planning (Control of Advertisements) Regulations 2007 and the applicant is content that these conditions should be applied. In addition the applicant would accept the following conditions recommended by the Head of Highway Services in the interests of highway safety;

1. The advertisement will be static only and not include any animation, flashing, scrolling intermittent or full motion video.
2. The advertisements will change no more frequently than once every 8 seconds with the transition between advertisements being a gradual and subtle process taking no more than 3 seconds.
3. In the event of breakdown, the screens will automatically power-off to prevent flashing error messages being shown.

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Planning Considerations
Amenity Issues

The 2007 Advertisement Regulations require applications to be assessed in the interests of amenity and public safety. In respect of amenity one needs to examine the character of the local area, which would include the nature and type of land uses and buildings, which together with features of interest make an areas character distinctive. The application site lies within an area that is characterised by educational and commercial uses and large scale buildings. There are no heritage assets within close proximity to the application site where its setting would be adversely affected by the proposal. The site does not lie within or close to a Conservation Area where protected views would be affected if this proposal were granted. The local visual context, which comprises the buildings, road infrastructure and range of commercial activity is the type of environment within which the proposal would comfortably fit.

Contemporaneous and comparable developments involving LED screens include the landscape LED screen affixed to the undercroft of the Chester Road / Mancunian Way interchange (097559/AO/2011/C1 granted 13th December 2011) and the double sided LED portrait screens affixed to a freestanding structure at the Princess Road / Mancunian Way junction (097532/AOH/2011/C1 granted 15th March 2012). Both developments indicate the acceptability of LED advertisement screens where they are sensitively positioned in areas of mixed uses alongside major transport corridors. In the latter case, which is most comparable to the application site, the officer stated the following;

> *'The proposed advertisement would be sited in a prominent location and would be clearly visible along the Mancunian Way. However, much of the wider context is a mixed use environment where such advertising can be considered to be appropriate/acceptable. It is also considered that the advertisement would not be out of place considering its location at a major gateway entry route into the City Centre and the scale and massing of some of the surrounding buildings that is consistent with the character of the surrounding area.'*

The description and summary provided above would equally apply to the application site, the only difference being a greater concentration of commercial

uses at the application site than at the Princess Road junction. The scale of buildings within the area is substantial and it is against this backdrop that the scale of the proposal is to be assessed. In this context I would consider that the proposed building would appear subordinate to the more visually dominate features of the street. On the issue of scale and proportion, Circular guidance 03/07 touched upon this issue in paragraph 8 of Appendix E, which states

> *'In predominantly commercial surroundings, the scale of buildings may be sufficiently large to accommodate larger poster displays without any adverse effect upon visual amenity...and it is to be expected that decisions on applications and appeals in commercial areas will seek to match the scale of poster displays with the scale of adjacent buildings'*

The structure would rise above the height of the elevated road, as do other buildings on the skyline, to create a bold presence, but would fall short of being unacceptably intrusive. The simplicity and elegance of the design provides a striking contrast to the unprepossessing buildings that form the visual context. The structure would enliven the area and provide a positive addition to the street scene to the benefit of the amenity of the area. It is considered that the proposed freestanding structure would not be against the interests of amenity but would enhance the local character.

Public Safety Issues

The fundamental consideration on matters of public safety is whether the proposed advertisements and the location for display would be so distracting or confusing to motorists as to create a hazard and prejudice road safety. The display screens will be positioned at a high level and will be seen for some distance by the main intended audience, who will be drivers on the approach to the site on Mancunian Way. There will be ample opportunity to see the simple messages being displayed on the screens without causing distraction. The approach to the application site from both directions is on a straight section of road devoid of any features where road conditions would demand exceptional care on the part of the driver.

With reference to the comments of the Head of Highway Services in respect of the Princess Road application (097532/AOH/2011/C1 granted 15th March 2012), the

highway consideration for that proposal and this current application are analogous. It states that;

> *'The Head of Highway Services has confirmed that the remaining totem display given its perpendicular position to traffic travelling on the elevated section of the Mancunian Way is specifically targeted at motorists on this route. The highway in this location is a straight ahead link, there are no immediate turning/weaving manoeuvres required close to the proposed signage, and it is therefore unlikely to cause a major safety risk due to driver distraction. Therefore it is considered to be acceptable from a highway perspective'*

From the western approach it should be noted that although the physical structure of the northern exit slip exists, it is a redundant road and so drivers are unable to exit at this point. Traffic joining the Mancunian Way to travel east can do so beyond the application site so there would be no potential for the proposed screen to distract drivers at a point of transition or merge. Equally for the eastern approach, drivers can join the Mancunian Way at the junction with Brook Street, but at this junction the merging driver is required to await a break in traffic rather than merge with moving traffic on the elevated road. Drivers' attention at this advanced point in the road is sufficiently detached from the application site as to avoid any visual conflict or potential distraction. Westbound drivers on the elevated road are unable to exit until after the appeal site and beyond Oxford Road.

Advertising is part of the fabric of commercial areas such as the Mancunian Way, where the skyline is punctuated with tall buildings on either side of the road. The proposed structure and integrated display screens would not appear as an unexpected, distracting or confusing feature that is likely to prejudice road safety. Driver expectation of seeing commercial images in commercial settings is very high and they are therefore alert to such visual stimuli and adjust their driving accordingly. The introduction of modern LED technology to this part of the City would not represent an unusual form of development that would conflict with local character. Recent developments at the Princess Road / Mancunian Way junction to the west of the application site also represents the appropriateness of the location for modern and visually stimulating forms of outdoor display that can complement and enhance local character.

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It is considered that the proposal incorporating LED screens would be consistent with both national and local policies regarding advertisement consent, including the Council's Unitary Development Plan policy DC15 "Advertisements, Hoardings and Posters". The proposal will have the effect of improving the appearance and perception of the City for visitors and locals. The investment in modern, cleaner and greener technology will meet the policy objective of creating a positive impression of the City and one that embraces sustainable development with exciting and new media formats.

Please contact me should you require any further details or information regarding the application.

Yours faithfully,

Martin Stephens BA (Hons) Dip TP MRTPI
Head of Planning
T: 020 8326 7732
F: 020 8326 7738
Email: martin.stephens@jcdecaux.co.uk