

28 April 2025

FAO Jennifer Atkinson
Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

Dear Jennifer,

Application for Advertisement Consent between Holt Town Tram Stop and Cambrian Street Bridge along the Citylink Route to the Etihad Campus, Manchester.

Please find enclosed an application submitted under the Town and Country Planning Act 1990 (as amended) and Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) (hereafter referred to as the 'Advertising Regulations') for artwork proposals on a wall between Holt Town Metrolink stop and the Cambrian Street Bridge along the Citylink Route to the Etihad Campus.

The Applicant is Eastlands Arena Limited.

The application is for a flexible zone to display painted artwork and enhance the Citylink route between Holt Town and the Etihad Stadium.

Background

Full Planning Permission was granted on 6 October for the development of the Co-op Live Arena at the Etihad Campus, in East Manchester, under Planning Permission Ref: 126431/FO/2020 (as amended).

As stated within Section 7 of the approved Planning Statement, the development proposals are to include a wider package of transport mitigation measures to support the development of the arena, including improvements to the Citylink walking route located between the Etihad Campus and Holt Town. These measures are aimed at promoting sustainable travel and improving the

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attractiveness of active modes of transport to access the Etihad Campus. Improvements to the route also help to create a stronger sense of community identity and pride in East Manchester, benefiting both residents and visitors.

Planning Permission and Advertisement Consent was approved on the 19 April 2024 (139256/AOH/2024 and 139236/FO/2024), for the installation of illuminated and non-illuminated advertisements and external design installations along the Citylink walking route.

Co-op Live is now fully operational and the proposals for the walking route installations are now mostly erected.

The proposals for an LED screen (approved under application ref. 139256/AOH/2024), located adjacent to the tram lines between Holt Town Tram Stop and Cambrian Street Bridge, were not progressed due to further complex testing and design requirements associated with the wall and its adjacency to the tram lines. The intention remains however to activate the wall. Therefore this application seeks to formalise proposals for a flexible artwork zone which will form part of the wider scheme of improvements to the Citylink route.

The Site

The Site comprises of part of an existing urban pathway which provides connections between Holt Town Metrolink Stop and the Etihad Campus, referred to as the 'CityLink'. The Site comprises part of the wall to the left of Figure 1 below.



Figure 1: Citylink Route looking east towards the Etihad Campus, with Cambrian St Viaduct in the background (Google Street

Proposed Development and Advertisements

The proposals comprise a flexible artwork zone to a create a more attractive and educational route and to showcase the unique character of East Manchester and the Etihad Campus.

The flexible artwork zone consists of artwork painted directly onto the existing brick wall, with no temporary or permanent fittings or illumination. Please see the drawings below which depict the flexible artwork zone and initial proposed artwork.

Initial designs focus on Co-op Live's commitment to its Climate Pledge and encourage fans to walk to the arena. Each panel displays text promoting sustainable travel, including slogans like *"Be the planet's turning point"*. The overall design aims to guide pedestrians with positive messaging about environmental responsibility which enforce Co-op Live’s commitment to reducing the impacts of climate change and encourage sustainable transport methods.

Whilst the intention is for this artwork to be displayed initially, the Applicant requests that the permission enables future flexibility in its content. While future designs and timelines for changing the artwork are undetermined, they will be linked to the area of East Manchester and the Etihad Campus and its partners. Anything that will come after will be used to improve the fan experience, not an advertisement board. They will also adhere to MCC guidelines and will not promote or depict smoking or alcohol consumption.

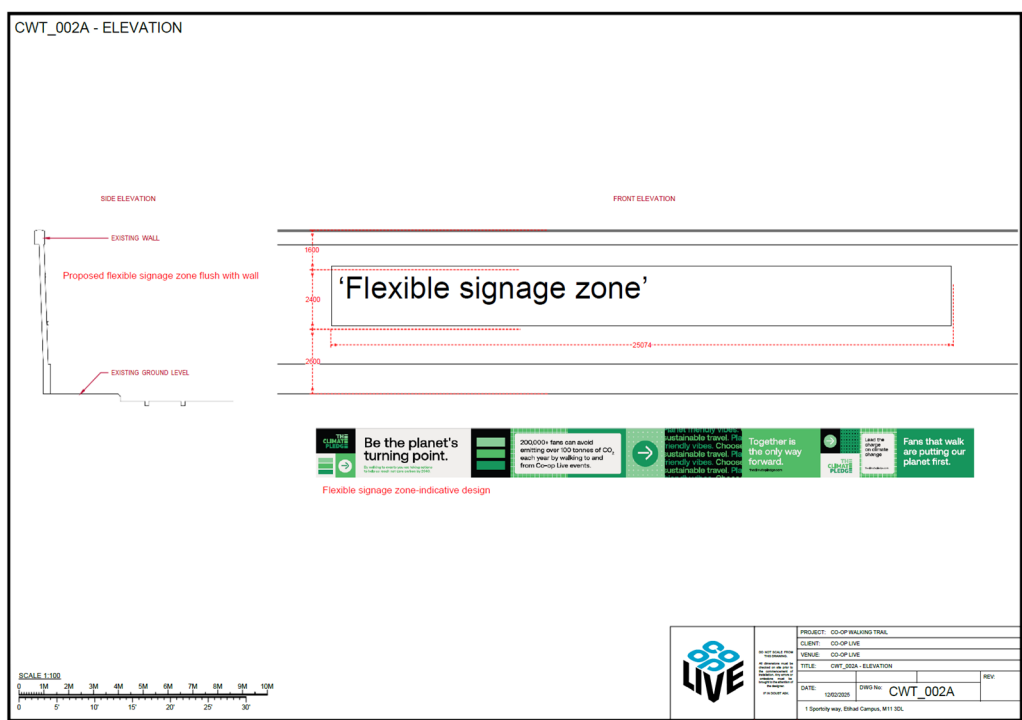


Figure 2: Flexible artwork zone drawing.

For ease, measurements of the proposed artwork/flexible artwork zone have been set out in the table below.

Table 1: Measurements of the proposed artwork/flexible artwork zone.

Dimension	Measurement (in m)
Height of actual artwork zone	2.4
Width of actual artwork zone	25
Distance from ground	2.6
Distance from top of wall	1.6

Pre-Application Engagement

The revised proposals for the flexible artwork zone were presented to MCC and support was provided in principle on 4 April 2025.

Operational Management

In order to mitigate against potential vandalism, the flexible artwork zone will be protected through the use of an anti-graffiti wash to prevent any damage to the artwork and to ensure the route is enjoyable and maintained to a high standard. The Applicant is also committed to future maintenance of the proposals including repairs to artwork.

Policy and Planning Guidance

National Planning Policy Framework (2024)

The revised National Planning Policy Framework (NPPF) was published in July 2018 and most recently updated in December 2024. The NPPF sets out the government's planning policies for all of England and how these are expected to be applied and is a material consideration in the determination of all planning applications.

The NPPF provides the following guidance in relation to outdoor advertisements within Chapter 12, *Achieving well-designed places* at Paragraph 141:

‘The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.’

Planning Practice Guidance (‘live’ document)

The Planning Practice Guidance (PPG) provides further clarification of the matters that can be taken into account when addressing applications for Express Advertisement Consent in relation to public safety and amenity.

In terms of public safety, the PPG provides further detail at Paragraph: 067 and 068, which principally relate to highways safety.

In terms of amenity, the PPG reiterates the wording of the Advertisement Regulations and the NPPF in stating that amenity is understood to mean the effect of visual and aural amenity in the immediate neighbourhood of an advertisement (Paragraph 079; Reference ID: 18b-079-20140306; Revision date: 06 03 2014). Therefore, in assessing amenity, a Local Planning Authority should always consider the local characteristics of the neighbourhood and whether the proposed advertisement is in keeping with that setting.

National Design Guide (2019)

The National Design Guide was published by the Ministry of Communities and Local Government in October 2019 and is a material consideration in the determination of a planning application. It sets out the characteristics of well-designed places and demonstrates what good design means in practice. It notes at Paragraph 99 that signage plays a part in achieving well-designed places.

Manchester Core Strategy (2012)

The Core Strategy does not set out specific policies related to advertisements. However, Policy DM1 (Development Management) sets out a range of specific issues to which all development should have regard, including:

- Regard to appropriate siting, layout, scale, form, massing, material, and details; and
- Regard of the character of the surrounding area, and the impact on the surrounding areas in terms of the design, scale, and appearance of the proposed development.

Saved Policies of the Unitary Development Plan (2012)

While the Core Strategy supersedes a large number of the policies contained within the Unitary Development Plan (UPD), a number of policies were 'saved' in 2012 and remain in effect today. This includes Policy DC15 (Advertisements, Hoardings and Posters) which sets out that:

"The Advertisement Regulations requires that applications for advertisements be considered only in the interest of amenity and public safety. In assessing the interest 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, no 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;*
- 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.*

Where having regard to the proceeding policies, the Council considers the proposed development to be acceptable in principle, conditions may be imposed in order to protect safety and amenity.'

Guide the Development Manchester (2007)

The Guide to Development in Manchester is a supplementary planning document and planning guidance adopted by Manchester City Council which aims to support and enhance the ongoing shaping of the City by providing a set of reasoned principles which will guide developers, designers and residents to the sort of development we all want to see in Manchester.

Within the SPD and guidance document it states that the 'needs of pedestrians, cyclists and disabled people will be pursued, to improve the quality of links to and through the Centre, to enhance the experience of users, and to increase connectivity between different areas in the Centre. Strategic through-routes will be protected to ensure that pedestrian movement is properly accommodated within development schemes, and opportunities will be taken to improve the quality of surfaces, lighting, signage, street furniture and public art.'

It also goes on to state that *'signage can be used positively to enhance legibility in new developments and if appropriately located and designed can be particularly helpful for visitors and users of large complex schemes'* and on *'major routes they should accommodate active ground*

floor uses, entrances, art or signage, to reinforce the character of the street and the sense of place.'

Eastlands Regeneration Framework (2017)

The Eastlands Regeneration Framework (ERF) was originally endorsed in 2011 which shaped and guided investment and development in East Manchester. It was subsequently updated and approved in 2017.

The ERF aims to achieve several key ambitions, including enhancing pedestrian and cycling links in an east-west direction to both the city centre and the Etihad Campus. This would be achieved by investing in infrastructure that prioritises walking and cycling options, including purpose-built lanes and footpaths, as well as through improved access to public transport. By creating these transportation connections, the framework seeks to make it easier for people to access the area, promoting sustainable travel options and reducing traffic congestion. Additionally, the proposed framework aims to develop north-south routes to improve connectivity between neighbouring communities.

Compliance with Planning Policy and Guidance

Principle of the Proposed Development

The proposals will support the creation of a world-class sports and leisure destination at the Etihad Campus and will encourage the use of active modes of transport through improving the pedestrian links from the City Centre, benefitting both residents and visitors alike. The principle of the proposals is therefore supported by planning policy, including Core Strategy Policy EC7 (Eastlands Strategic Employment Location) and T1 (Sustainable Transport), whilst it also supports the ambitions in the ERF, which is a material consideration in the determination of this application.

Appropriateness for Setting/Design

The area around where the flexible artwork zone is proposed features a paved pathway which runs alongside the Metrolink between Holt Town and the Etihad campus. There are no buildings opposite the Site and the proposals will not be visible from neighbouring properties.

The proposals will complement the existing advertisement and artwork installations along the walking route, adding colour and interest to an area that has historically had little activation. It also provides an exciting way to showcase important and topical matters, such as climate change, whilst its presence will align with the wider Etihad campus area and contribute to the overall

sense of place and identity of East Manchester. They will also act to discourage ad-hoc graffiti through creating pride and appreciation for the artwork in place. As such, it is considered that the proposals are of an appropriate design for their setting.

Amenity

The proposed artwork will be applied by paint and will not include any illumination or audio. The design proposed for the artwork will complement the surrounding environment and has considered the impact upon visual amenity. On this basis, it is considered that amenity will not be adversely affected by the proposals and that the application therefore satisfies the requirements of planning policy regarding consideration of these matters.

Public Safety

The creation of the flexible artwork zone will take place with reference to the latest best practices. As the flexible artwork zone does not involve illumination of any kind, there is no risk to light spill onto oncoming trams. It is also not located by a public highway and so will not pose a risk to drivers or highway users.

For pedestrians, the proposed interventions will enhance the overall physical attractiveness of the route for walking and cycling. It is therefore considered that the flexible artwork zone will not adversely impact public safety within the area.

For the reasons set out above, the proposals are considered to comply with the relevant national and local policies and guidance. There are no other relevant policy considerations, and as such it is considered that the proposal is in accordance with the Development Plan and the relevant material considerations.

Summary

The proposed flexible artwork zone is of a suitable scale and form, and will have no adverse effect on local character, amenity, or safety. The proposed interventions will act to improve placemaking on the Citylink walking route between the Etihad Campus and the City Centre, supporting the Etihad Campus as a key destination and encouraging the use of active modes of transport.

Therefore, the proposals are considered to be in accordance with national and local planning policy and the Town and Country Planning Act 1990 (as amended) and Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) and we respectfully request that Manchester City Council approve this Application.

In addition to this covering letter and the application form, the following documents have been submitted alongside this application:

- Management and Maintenance Strategy Plan (prepared by Co-op Live, dated February 2025)
- CWT_002A – ELEVATION (prepared by Co-op Live, dated 12 February 2025)
- CWT 002A – PLAN (prepared by Co-op Live, dated 12 February 2025)

This application for advertisement consent has been submitted by the planning portal (ref. PP-13949781) and a fee of £673 has been paid accordingly.

We trust that you have all the information you need to validate the application. Should you have any queries with the application, please do not hesitate to contact Jennifer Chatfield (jchatfield@deloitte.co.uk/0161 455 8084).

Yours sincerely

A handwritten signature in black ink that reads "Deloitte LLP". The signature is written in a cursive, slightly stylized font.

Deloitte LLP