

**BILLBOARD
Advertising Ltd**

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

18th January 2023

Dear Sir Madam

Town and Country Planning Act 1990
Land adjoining Universal Buildings Devonshire Street North
Ardwick M12 6JR

Please find enclosed an application submitted under the provisions of the Town and Country Planning (Control of Advertisements) Regulations 2007 for advertisement consent to upgrade and rationalise an established paper and paste advertising display at the above site.

The application site is located at the junction of Higher Ardwick with Devonshire Street North in Ardwick. The site is an established advertising location consisting of five landscape panels forming part of the enclosure to a surface car park adjoining the five story Universal Building. This proposal is to reduce the extent of advertising from five panels to three and to change the technology used to display advertising for the single central panel from paper to LED screen. This change is part of a wider industry transitioning strategy to upgrade existing analogue units to meet modern display requirements. This proposal will result in a total of three landscape displays at the site of which only one, Panel B, will be redeveloped using digital technology.

The Proposal

The application relates to the north and east frontage of the site facing Higher Ardwick and Devonshire Street North, as illustrated in the attached documents.

Two of the existing 48 sheet displays will be retained in their current location and continue to be used to displays paper advertising copy, which remains a viable product and lower cost for local business advertising. The proposed replacement 96 sheet advertisement (Panel B) will be positioned along the east facing frontage in between the 48 sheet displays. Although there will be a marginal increase in the overall height of Panel B above street level, this increase will have no negative effect upon the street. The change to modern digital technology will realise a range of potential benefits which include:

- Inward investment in the quality of the roadside advertising;
- Reduction in vehicle trips to service the display from 34 to 2 visits per annum;
- Sustainable form of roadside display removes the need to print posters and avoid the waste and energy consumption in the recycling process;
- Ability to broadcast emergency messaging (e.g. public health messaging);
- Opportunity for more creative real time and locally relevant advertising;

All three advertisements will be illuminated displays and show static images to a maximum illuminance level of 300Cdm² in respect of Panel B and 150Cdm² in respect of Panels A and C. The images shown on Panel B can be changed remotely by the operator using a secure ISDN connection. The light level will be constantly monitored and controlled by sensors that vary the brightness of the screen according to the prevailing ambient light conditions. This measure is necessary to make the images clearly visible during the day with the level of illuminance reduced to 10% of maximum capacity between dusk and dawn thereby 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 Benefits of LED Technology

The detail of the LED tiles is included with the application documentation and represent the latest and most efficient form of display method. Modern digital formats are redefining this media and support the objective of sustainable development that meets changing commercial and consumer needs. The environmental benefits of LED technology is evident not only in the reduced energy costs in operation but also in removing the need to print and recycle the depleted printed material.

The use of LED technology in neither an unusual nor unexpected feature within the City. It is now the display methodology most commonly used in the advertising industry for both internal and external applications due to its efficiency and functionality.

The following conditions have become established as best practice for roadside digital displays and can 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.

The Site

The proposal site is located within a wholly commercial/industrial area where this form of roadside display is not unexpected or unusual. The previous

analogue displays on the land where of long standing and lawfully displayed under the provisions of the Regulations. Consent was granted for a similar form of site upgrade and rationalization, which was approved on appeal in 2018 and a copy of that decision is included with the application. The Inspectors assessment of the character of the locality and the effect of the unit upgrade remains relevant to the current scheme. The surrounding area is unchanged and has a pronounced commercial profile and absence of any residential uses or sensitive aspects. The road and rail infrastructure also play an important part in defining the character of the area and the likely effect of the advertising use of the area. The site and immediate context do not fall within a conservation area nor is the site close to any heritage asset.

The proposal site is an established location for advertising. The size and nature of the advertisement has not altered for many years and therefore benefit from deemed consent under Class 13 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

The considerations in terms of visual amenity concern the likely impact of the signs on the appearance of the proposed building and on the area generally. The proposal seeks consent to replace and update one of the existing displays at the site and the significant rationalization of the entire site by 40%. The change to a digital format, despite a marginal increase in overall height, will have minimal impact on the visual amenity of the surroundings. The size 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, the history of illuminated advertising and street lighting establishes the site as appropriate for the continuation as an illuminated advertising location. 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.

The advertisement display will be viewed by road users travelling southwards on Devonshire Street North with the display framed by the massive scale and structure of the overhead rail bridge. The display panels are set back from the junction and therefore not in direct eyeline or conflict with any signal heads. The proposal could not be considered to create clutter as it rationalizes the lawful extent of display rather than increases the advertising area at the site. The application site sits within a heavily commercial environment and the type of environment where building scale and the nature of the land use can support the larger forms of advertising without harming appearance or character. The effect of the proposed signage would not harm the visual amenity of the 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.

The proposed display would occupy the same setback and offset position as the existing units, ensuring site lines and visibility splays are maintained. It would be seen by traffic primarily travelling south, along a well-lit, straight, level approach with good forward visibility. Highway users would therefore be fully capable of seeing the content on display in advance of the application site without being distracted. 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 not be distracted from their awareness of surrounding

traffic movements. Consequently, the proposed alteration to the existing display unit would not give rise to public safety issues.

Conclusion

The proposal seeks consent to update one existing advertisement display and the removal of two others with a digital display showing static advertisements on rotation. The proposed upgrade of the single advertisement is consistent with both national and local policies regarding advertisement control. 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. The investment in the latest technology will meet the policy aim of creating a positive impression of Manchester for visitors and locals alike whilst combining sustainable development objectives with the development of exciting and new media formats.

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

Yours faithfully,

Darren Alderson

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c/o

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