

Manchester City Council
Planning
PO Box 532
Manchester
M60 2LA

26th October 2022

TK Ref: T4752 - McC13218
Planning Portal Ref: PP- 11593440

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007 (AS AMENDED)**

LAND AT QUEENS ROAD, MANCHESTER, M8 0JL.

In accordance with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 ("the Regulations"), please find enclosed an application for express advertising consent.

The application comprises the following documents and drawings:

- Application Form
- T4752 A4 050 Location Plan Proposed
- T4752 A4 051 Site Plan Proposed
- T4752 A4 060 Elevations - Existing and Proposed
- T4752 A4 061 Elevations - Existing and Proposed
- D48VM-FS LED Digital 48 Sheet with Vertical Meadow – Freestanding
- CC_Vertical Meadow Planning Information Document

The fee of £462 will be submitted via the Planning Portal under the relevant reference.

THE APPLICATION SITE

The application site comprises land at Queens Road, in Manchester.

Cirencester Office:
The Cube, 19 Love Lane
Cirencester, Gloucestershire
GL7 1YP

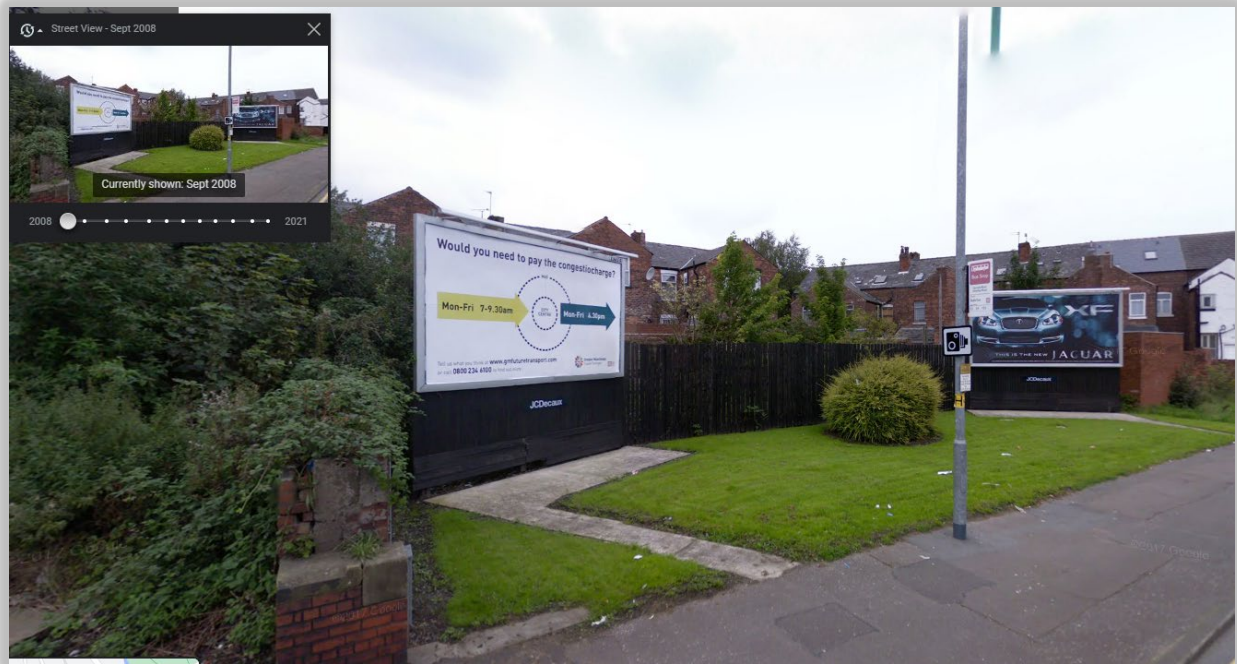
Company Registration:
1588564

Directors:
PC Thacker MRICS

Senior Associate:
S Thornhill B.A. (Hons)

The site was previously occupied by a pair of illuminated poster advertisements, displayed with deemed consent under Class 13 (Schedule 3) of the Regulations, having been in situ in excess of the qualifying ten-year period. This submission seeks consent for the reinstatement of the advertising use with modern equivalents; two internally illuminated 48-sheet (6m by 3m) digital poster displays.

See Image below from 2008 – *Courtesy of Google Earth*



The proposal is for the installation of a pair of illuminated 48-sheet digital poster displays. Such advertisements are now increasingly common as the advertising industry moves towards more flexible and sustainable media platforms.

Clear Channel propose to operate the displays in accordance with conditions and limitations used industry wide, part of the Outsmart (2021) roadside advertising code. Hence, the proposed advertisement will not detract from local amenity or pose a material risk to public safety, as required by the Regulations.

THE PROPOSED ADVERTISEMENTS

The proposed displays would have a landscape profile and a display area each measuring 18 sqm. The display modules would be enclosed in a pressed metal and reinforced plastic frame that is lightweight and can be erected with limited additional engineering.

The changing displays would present a range of static images on rotation, at the industry standard of once every 10 seconds. Advertisement images would not, therefore, contain any movement, animation, or flashing lights, with the interchange between each advertisement a gradual and smooth fade.

The displays would be illuminated to levels that accord with the recommendations of the Institute of Lighting Professionals ("The Brightness of Illuminated Advertisements" PLG05, 2015); this guidance is accepted as canon by local authorities across the UK.

It states that the uniformity of luminance across a display area must be kept within reasonable limits to ensure a pleasing and effective result. “Pleasing” should be satisfactory in the interests of amenity; “effective” can be taken to be legible and clear.

Its recommended maximum luminance levels for illuminated advertisements at night (or hours of darkness) are in Table(s) 3 and 4 of the document, summarised as follows:

Zone	Surrounding	Lighting environment	Examples	Maximum recommended luminance (cd/sqm) at night (displays over 10 sqm)
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations	200
E3	Suburban	Medium district brightness	Small town centres or suburban locations	300
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity	300

Recognising the changing levels of ambient light throughout the day, PLG05 states that digital displays should never exceed 5000 candela/sqm (cd/sqm). Hence, the displays are controlled by an ambient light sensor system which regulates the brightness of the display, taking into account the changing dawn and sunset times throughout the year.

The proposed advertisement adjusts its output according to the prevailing levels of ambient light, up to 3000 cd/sqm luminance on the brightest of days. While 3000 cd/sqm is the maximum threshold, average luminance of bright colours within advertisements on the brightest of days is around 2500 cd/sqm; on dull overcast days, average luminance of bright colours within advertisements is around 375 cd/sqm.

During periods of darkness, the displays operate at a set darkness setting with a maximum brightness of 300 cd/sqm. The displays therefore operate in full accordance with PLG05 and would never appear overly bright or cause glare.

In addition, content will be controlled remotely in real time and the site will be monitored 24/7 using diagnostics software to facilitate both responsive maintenance and resolve any issues that arise.

With regards the vertical meadow green wall; it is effectively a vertical plantation comprising various wild flowering species. Endorsed by bodies such as the London Wildlife Trust, it aims to provide not only a visually appealing element, but also encourage local biodiversity and enhance the natural capital of urban/city environments by attracting wildlife (bees, butterflies etc.).

This accords with the thrust of the forthcoming Environment Bill (2020) which will create legislation to support urban greening, making it mandatory for planning proposals to secure a ‘biodiversity net gain’. Installed underneath the advertisement, its modular design includes a backboard, seeded mat and water tank irrigation system comprised of sustainably sourced materials. It will be maintained in accordance with Clear Channel’s normal servicing schedules.

To ensure compliance, Clear Channel advance a series of planning conditions, in addition to those applied as standard by Schedule 2 of the Regulations, as follows:

- i. During periods of darkness, the luminance level shall not exceed 300 candela/sqm as advised by the Institute of Lighting Professionals' publication PLG05 (2015): "The Brightness of Illuminated Advertisements", or any publication replacing or superseding this guidance;
- ii. The screen display shall only show two dimensional static images, shall contain no moving images, animation, video or full motion images and no messaging should spread across more than one screen image;
- iii. The display shall be switched off between the hours of 23.00 and 05.00;
- iv. The advertisement display shall not change more frequently than every 10 seconds; and
- v. The illumination of the advertisement shall not at any time be intermittent.

POLICY FRAMEWORK

The powers to control advertisements under the Regulations may be exercised only in the interests of amenity and public safety, taking account of any material factors.

The National Planning Policy Framework ("the Framework") and the Planning Practice Guidance ("the PPG") reiterate this approach, and under section 222 of the Town and Country Planning Act 1990 Act, planning permission is deemed to be granted for any development of land involved in the display of advertisements in accordance with the Regulations.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the primacy of the development plan does not apply to advertisements and therefore local policies are material insofar as they are relevant; they are not decisive. Greater weight is attributed to site specific circumstances.

The Framework states that great weight should be given to outstanding of innovative designs which promote high levels of sustainability, consistent with the emphasis that local planning authorities should respond positively to changes and innovations offered by new technology.

Digital poster displays are a more efficient and sustainable media platform compared to their more traditional paper or vinyl counterparts. The proposed advertisement's remote operation removes the need for frequent site visits and reliance on non-renewable resources.

PLANNING BALANCE

The PPG advises that the local characteristics of an area should be considered when assessing amenity. The site is not within a conservation area, nor are there any listed buildings or other heritage assets in the vicinity which warrant special consideration.

In a wider sense, the advertisement would be illuminated to levels that accord with PLG05 and calibrated to achieve the same effect as a standard poster display. Subject to the conditions and limitations set out above, therefore, the advertisement would unlikely add so significantly to the existing level of illumination within the area that it would be detrimental.

On balance, therefore, the proposal would sit comfortably in its visual context and would have no discernible impact on the existing character and appearance of the area.

With regards public safety, the PPG states that all advertisements are intended to attract attention. and there are less likely to be issues if they are located in commercial areas.

The displays would be visible to those travelling in a Westerly and Easterly directions along the A6010, Queens Road. It is level, well-lit and limited to 30mph. The advertisements would be internally illuminated and would sequentially show static images rather than moving images or animation; all are to be secured by condition to ensure compliance.

There are no unusual complexities here, and the site's offset and elevated position ensures it would not obscure any sightlines or interfere with the clarity of the highway's infrastructure, as desired by the PPG.

In these circumstances, therefore, it would not constitute a potentially hazardous distraction to anyone exercising a reasonable standard of care.

SUMMARY

The proposal submitted reflects the applicants' preferences.

Should the Council wish to discuss any aspect of the scheme, Turnkey Design Partnership would welcome the opportunity to address any concerns prior to determination.

I look forward to receiving confirmation that the application has been validated.

If you require additional information or clarification, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Paul Thacker', with a horizontal line underneath.

Paul Thacker - Director
Turnkey Design Partnership Ltd.

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