

Our Ref: JW/GM/93456

15 August 2022



Manchester City Council  
PO Box 532  
Town Hall  
Manchester  
M60 2LA

Dear Sir/Madam

**REPLACEMENT OF EXISTING POSTER ADVERTISEMENT DISPLAY WITH INTERNALLY ILLUMINATED D-POSTER**

**72 ROCHDALE ROAD (A664), MANCHESTER, M40 7PN**

**PLANNING PORTAL REFERENCE: PP-11477195**

Alder King Planning Consultants have been instructed to submit an application for advertisement consent to upgrade an existing 48-sheet poster and paste billboard to a modern 48-sheet internally illuminated digital billboard poster format ('D-Poster') capable of being operated remotely from a central location.

This is part of a wider project to modernise the applicant's advertisement network utilising new display technology that is lightweight and can be erected with limited additional engineering, as the digital poster weighs little more than the paper and paste poster it will replace. 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 replace the existing poster and paste board on land adjacent at 72 Rochdale Road, Manchester, M40 7PN ('the site') with an internally illuminated D-Poster which will display static advertisements on rotation.

The site currently comprises a south west facing 48-sheet paper and paste billboard. It is proposed to replace this with a 48 sheet internally illuminated D-Poster. This represents a like for like swap with regard to the positioning, size and scale of advertisement at the site. The submitted existing and proposed site plans including elevations reflect the replacement of the existing poster and paste board at the site with a new illuminated digital screen.

The quality of the image produced will mimic that of a traditional poster board, with the overall aim of the project being to replace like for like with no associated adverse impacts. The submitted before and after photos at an example site at 142 Liverpool Road, Warrington, shows visually how the upgrading of a traditional poster and paste board is done without materially changing the appearance. This example site is submitted for the case officer's reference when assessing the proposed works at the site.

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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;
- 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.

The display would be limited to 300cd/m2 at night time (on a full white display) in accordance with the Institute of Lighting Professionals best practice guidance; *The Brightness of Illuminated Advertisements PLG05 2015* and will adjust according to ambient brightness. The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the existing poster being replaced.

The following conditions have become established as best practice for roadside digital displays and will 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;
- Advertisements to change no more frequently than once every ten seconds.
- At no time shall the Luminance level of the signs exceed the thresholds contained within the Institute of Lighting Professionals (ILP) guidance document PLG05 – The Brightness of Illuminated Advertisements 2015 (or any subsequent amendment/replacement to this guidance).

Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant. However, it would be expected that the Local Planning Authority present evidence based justification for deviating from the standard approach as any planning conditions imposed must meet the six tests as set out in National Planning Policy Guidance (NPPG).

### The Site

The proposal site constitutes land at 72 Rochdale Road (A664), Manchester, M40 7PN. The proposal site currently supports one 48-sheet paper and paste advertisement billboard. This comprises a classic 'backlight' unit comprising a metal frame and cathode tube lighting over the front of which a vinyl image

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is manually stretched and affixed. In the immediate context, the setting of the site comprises a mix of residential and commercial/industrial use.

Owing to the positioning and orientation of the existing signage on the site and any nearby dwellings, there are no views of the signage from any dwelling in close proximity. The signage on the site faces south west and is visible to traffic travelling northeast along Rochdale Road (A664).

The proposal site is an established location for advertising, having demonstrably supported one 48-sheet billboard for over 10 years. Photographic evidence, using Google Streetview, confirms that the existing billboard has remained in place for over 10 years which therefore benefits from deemed consent under Class 13 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

The street scene along Rochdale Road is characterised by a plethora of signage including the existing signage on the proposal site and a 96-sheet externally illuminated billboard situated in close proximity to the south.

This sets out the position of the site and immediate vicinity in that it is an established area for signage. It is noted that the proposals seek to only upgrade and digitise an existing lawful billboard and would not further intensify the area in this regard.

### **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 2021 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 136 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.

The Manchester City Council Local Plan constitutes the Manchester Core Strategy (adopted July 2012) and the Extant Unitary Development Plan (adopted 1995, containing city-wide and local area policies not replaced by the Core Strategy).

### **Planning Considerations**

The proposal seeks to replace the existing advertisement signage on the site like-for-like with regard to size, positioning and orientation. The proposed change to introduce internal illumination to advertisement signage on the site and remote control over operations seeks to ensure that the change in the impact of the site on the surroundings is *de-minimis*. The impact of the proposed works is considered in amenity and public safety terms below.

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It is noted that advertisement consent ref: 144372/AOH/2016 was granted on the site in 2016 to replace the existing advertisement display on the site with a 48 sheet internally illuminated LED display sign. This consent has lapsed hence the reason for this application however in all regards the considerations remain the same. The principle of the proposed works is therefore considered to be established owing to the Council having previously recently approved these on the site.

### Amenity

The proposal seeks to replace the existing advertisement billboard at the site with a D-Poster of the same size, positioning and orientation. The proposed works will see replacement of the dated billboard on the site with a modern digital screen. As such, it is considered this will have no impact on visual amenity. The level of illumination of the proposed D-Poster will be set to ensure that the proposed advertisement is not visually materially different from the existing position. The before and after comparison photographs on the submitted example site at 142 Liverpool Road, Warrington illustrates the minimal visual difference between the existing type of display on the site and the proposed replacement once controls are put in place.

The position and orientation of the signage on the site is such that this does not face any residential windows on nearby dwellings such that the signage would be viewable. There shall therefore be no light spill into any dwellings from the proposed D-Poster. During the day, the proposed level of illuminance will be set to mirror that of a traditional poster and paste board, in line with the current position of the site. At night time, the controls proposed over the level of luminance along with the orientation of the D-Poster will ensure that the introduction of internally illuminated signage on the site does not cause material harm to amenity. Luminance of the D-Poster will be limited to 300cd/sqm during night time hours to ensure no negative impact to amenity in this regard.

It is noted that street lighting lines Rochdale Road with a column located adjacent to the site, offering a degree of illumination to the existing signage. When considering the merits of the proposed digital advertisement board, it is important to note that should consent not be forthcoming, the fall-back position amounts to what already exists on the site. The principle of the proposed use is therefore already established and the current poster board would remain in situ should the proposed digitalisation not be approved. Moreover, the planning history on the site confirms that the Council has previously granted advertisement consent for proposed works (which has now lapsed).

Consideration should therefore only be given to the replacement of the existing advertisement board and any impacts this would bring i.e. the introduction of internal illumination. Visually, it is considered that this will have no impact on the street scene and any residential dwellings, thereby there will be no detrimental impact on amenity when compared to the current lawful position. The history of the site and context of the surroundings including the surrounding signage in the area establishes the site as appropriate for an illuminated advert of the type proposed.

Given the nature of the site and surrounding area and the presence of other signage in the immediate context, there would be little, if any, material change in the appearance of the street scene. The existing advertisement billboard at the site has been in place for over 14 years and constitutes a well-established feature of the street scene. The proposed replacement D-Poster would have no impact on the street scene when considered in this context, would cause no cumulative increase in advertisement signage and sit comfortably in the visual context while not harming amenity, the qualities of the site, or the character or appearance of the wider area.

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The proposed works will therefore have no unacceptable impact with regard to amenity.

### 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 a 48 sheet advertisement billboard 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 in relation to D-Poster 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. It should be noted that the proposed conditions are now well established as best practice and as such any change (e.g. to the rate of change) would need to be evidence based and be specific to the location.

The proposed D-Poster would be seen primarily by traffic travelling northeast along Rochdale Road which is well lit, straight, level and has excellent forward visibility. Road users would be fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead and would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

The proposal to introduce internally illuminated signage to the site is considered to have no material impact on the level of distraction caused to any road users such that it would have the potential impact on highway safety. It should be noted that drivers are almost always continually assimilating sensory inputs from multiple sources whilst driving. It is not considered that the presence of the proposed D-Poster at the site would represent a material departure from the types of features that drivers are used to seeing at the roadside. The proposal would therefore not appear as an incongruous feature.

The introduction of a sequential change in the adverts will not have a material impact on the level of distraction as the changeover will be instantaneous and not more frequent than once every 10 seconds. This will reduce eye dwell time on the D-Poster and therefore the potential for a distraction is low. In this regard, free flowing traffic along Rochdale Road will see most road users pass the sign without seeing a sequential advert change and in times of stop-start traffic, road users will be travelling very slowly. The introduction of a sequential advert change on the signage at the site is therefore considered to pose no increase in risk to highway safety.

Under these circumstances, such a familiar feature of Rochdale Road and the surrounding highway network would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent.

### **Conclusion**

The existing externally illuminated advertisement board on the site has demonstrably been in place for over 14 years and is a well-established feature of this part of the street scene along Rochdale Road. The existing lawful advertisement signage on the site shall be retained in the event that consent is not granted for the proposed D-Poster. The proposal constitutes a like-for-like replacement of

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advertisement signage on the site in all regards save for the introduction of internal illumination and sequential advert change.

The proposed conditions to control the luminance of the screen and the operation of the digital screen will ensure that there is no harm to amenity or road safety.

The Council have previously granted advertisement consent in 2016 for the proposal to replace existing signage with a 48 sheet D-Poster (ref: 114372/AOH/2016). The acceptability of the proposed works remains consistent with this previous application.

For these reasons, when assessing the impacts of the proposed works with regard to amenity and public safety, it is considered the proposals are consistent with the extant lawful position and would not give rise to any unacceptable impact in both regards. This application for advertisement consent should therefore be granted without delay.

### **Application Submission**

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

- Completed application forms prepared by Alder King Planning Consultants;
- Letter Statement prepared by Alder King Planning Consultants (this letter);
- Before and after photos, example site at 142 Liverpool Road, Warrington, WA5 1QX9;
- Site Location Plan ref: 15174/PA/01;
- Existing Site Plan ref: 15174/PA/02;
- Proposed Site Plan ref: 15174/PA/03; and
- Existing and Proposed Elevations ref: 15174/PA/04.

Additionally, we will arrange payment to Manchester City Council for the sum of £462 to cover the cost of the Advertisement Consent application.

We trust that the above is clear and 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



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