

Planning

Growth & Development

Delegated officer report for planning application

Application no. 144114/FO/2025
Date registered valid: 30 September 2025
Proposal: Installation of digital LED totem.
Address: Outside Deansgate Station, Whitworth Street West, Manchester , M1 5WY
Ward(s): Deansgate Ward

Applicant: BT Telecommunications PLC
Agent (if any): Nia Bywater Dalcour Maclaren
Case officer: Lea Joseph
Tel: 0161 227 3644
Email: lea.joseph@manchester.gov.uk

Recommendation: **Refuse**
Date of recommendation: **25 November 2025**

Application details

Type of application: Full Application Consent

Development type: Minor Other

Date of site visit: 16 October 2025

Standard consultations:

Printed: 27 October 2025 Expired: 17 November 2025

Neighbour notifications

Printed: 8 October 2025 Expired: 29 October 2025

Site notice

Posted: 16/10/2025 Expired: 06.11.2025

Press advert

Published: 14 October 2025 Expired: 4 November 2025

Departure from Development Plan: No

Environmental Statement: Not required

Description of site and area

Listed building: Not applicable

Conservation area:

Tree Preservation Order:

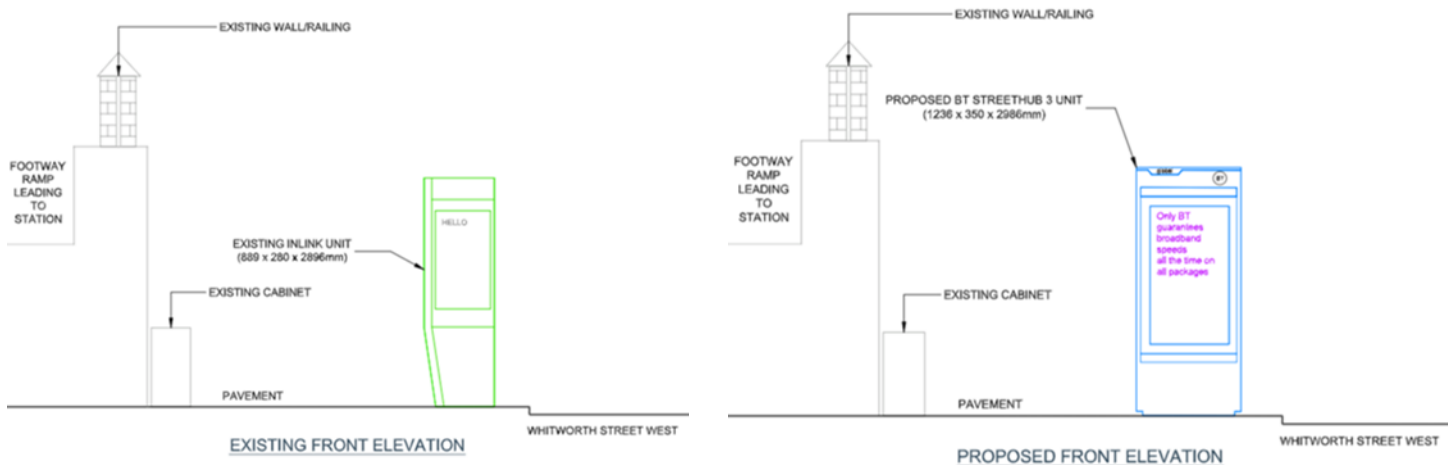
The application relates to a site comprising a small area of pavement adjacent to Deansgate Rail Station.

The area contains a mix of historic and modern buildings. The contemporary Deansgate Tram Station is parallel to the rail station and modern link bridge above the adopted highway connects the two stations. Historic rail infrastructure is also present in the area at the intersections of Whitworth Street West, Deansgate, Castle Street and Bridgewater Viaduct.

The Grade II Listed Deansgate Station (formerly Knott Mill Station) forms part of the setting for the site. The building was listed in 1998 and originally built in 1849 then reconstructed in 1896. The Station is unique for its siting on an acute angle and curved entrance. The building is primarily composed in red brick and borrows from the Gothic and Baronial architecture styles which can be seen in its arched doorways with decorative sandstone aediculas and decorative portcullis. Sandstone decoration can be seen across the building, and decorative blue brick is present at the ground floor level around the entirety of the structure's exterior.

Description of development

Full planning permission is sought for the replacement of a digital InLink totem with a BT Street Hub Unit.



The application is being considered alongside application ref no 144115/AOH/2025 which seeks consent for Installation of 2no internally illuminated digital display screens.

Planning History

118447/FO/2017 | Full Planning Permission for installation of 1no. 2.9m high Inlink following removal of 1no. KX100 telephone kiosk. (Approved June 2018)

118448/AOH/2017 | Installation of 2no digital LED display screens to associated InLink relating to planning application 118447. (Approved June 2018)

144115/AOH/2025 | Installation of 2no internally illuminated digital display screens. (being considered in conjunction with this application.)

Consultations & Notification Responses

Publicity

Notification letters have been sent to surrounding properties and a notice was posted at the site. No representation have been received.

Ward Members – An objection representation has been received from Councillor Johns who is concerned by the volume of applications from the applicant. Many of these are in busy locations where street clutter should be reduced. Object on the basis that they reduce available pavement space and contribute to crime and anti-social behaviour.

Highway Services - Highways are concerned that the increased footprint of the proposed BT Street Hub Unit will impede pedestrian movement and inclusive access on the highway. They consider this to be of special concern due to the City Centre location and proximity to the rail station. They consider that the installation of a wider unit could lead to reduced levels of pedestrian comfort, navigation and safety, particularly for pedestrians with accessibility requirements. Highly congested areas could lead to pedestrians stepping into the cycle lane or live carriageway which is a safety concern. There are safety concerns related to obscured

vantage points enabling anti-social behaviour. The proposal would heighten this issue and exacerbate the issues of street clutter in the environment and is inconsistent with the council-wide decluttering strategy while also failing to meet street design standards and policy related to safety, access and active travel.

Environmental Health - No objections. If approved the proposed unit must be conditioned to only display static images with a minimum display time of ten seconds. Calling and voice activated technology may not be implemented until a Noise Management Plan is submitted for review. A Management Plan would also be required for review

Transport For Greater Manchester Metrolink – No comments.

Counter Terrorism Policing North West (CTPNW) – No objections.

Network Rail – No objections.

Policy

The Places for Everyone Plan - Joint Development Plan Document, for nine of the 10 boroughs which make up Greater Manchester adopted on 21st of March 2024:

JP-Strat2 City Centre
JP-C5 Streets for All
JP-P1 Sustainable Places
JP-P2 Heritage

The Places for Everyone Plan - Joint Development Plan Document, for nine of the 10 boroughs which make up Greater Manchester adopted on 21st of March 2024:

EN1 City Centre Strategic Character Areas
EN3 Heritage
DM1 Development Management
SP1 Spatial Principles
CC9 Design and Heritage

Saved Unitary Development Plan for Manchester (1995) - The following saved UDP Policies are of relevance to this application:

DC19 Listed Buildings
DC22 Footpath Protection

Other Material Considerations:

National Planning Policy Framework (NPPF) (2024):

- Chapter 12 - Achieving well-designed and beautiful places
- Chapter 16 - Conserving the Historic Environment

Planning (Listed Buildings and Conservation Areas) Act 1990

Sections 66, and 72 of the Listed Buildings and Conservation Areas Act 1990 require that special consideration is given to the preservation of the significant fabric and setting of listed buildings and conservation areas.

The National Design Guide (January 2021)

Illustrates how well-designed places that are beautiful, enduring, and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

Greater Manchester's Streets for All Design Guide (2023)

Adopted November 2023 to ensure will ensure that streets are welcoming, green and safe spaces for all people, enabling more travel by walking, cycling, and using public transport while creating thriving places that support local communities and businesses.

The Guide to Development in Manchester Supplementary Planning Document and Planning Guidance (Adopted 2007)

This document provides guidance to help develop and enhance Manchester. In particular, the SPD seeks appropriate design, quality of public realm, facilities for disabled people (in accordance with Design for Access 2).

In Chapter 2 'Design', paragraph 2.7 outlines the City Council's expectations that all new developments should have a high standard of design making a positive contribution to the City's environment and encourages "the most appropriate form of development to enliven neighbourhoods and sustain local facilities.

Issues

Principle of Development

The application would see the installation of a digital totem on the public footway, for public use, with the City Centre. Due to impact on visual amenity, the setting of the Grade II Listed Building and public safety concerns, the proposed installation is not considered to be acceptable in principle.

Siting, Scale, Appearance and Impact on visual amenity the Setting of a Listed Building



The proposed Totem would have an increased footprint of 347mm in width, 90mm in height and 71mm in depth. The size of the advertisement screen would also significantly increase. Policy DM1 states that all development should have regard for appropriate siting, layout, scale, form, massing, materials and detail, impact on the surrounding areas in terms of the design, scale and appearance of the proposed development, and have regard to the character of the surrounding area. Section 12 of the NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The larger, bulkier, darker materiality of the structure is not considered to have regard for the character of the surrounding area nor is it thought to enhance the attractiveness of the street scene and is therefore contrary to this policy.



Existing totem in situ, totem was approved without unauthorised vinyl wrap which was added later.

In comparison to the existing structure, the proposed would be wider and taller. The proposed base would widen and no longer have a narrow footprint. The totem would be a galvanised steel structure and feature a black powder coated cladding. Each side of the totem would feature a digital HD screen measuring 0.95m x 1.67m. The overall appearance of the structure is considered to be utilitarian.

In terms of the existing totem's approval the supporting information outlined a strategy for the removal of many telephone boxes that were not replaced by InLink units, thereby contributing to a reduction in the amount of visual street clutter within the street scene. The 2017 approval was a replacement of a telephone box. The installed unit had a smaller footprint than the telephone box at the site and was considered to be a more accessible option for free calling for disabled users. The proposed totem structure differs greatly from the previous due to it's increased footprint and negligible public benefits in comparison to the existing.

When viewed in the context of the street scene described above, the Street Hub totem would be larger and bulkier, particularly when viewed from the front and back. This would therefore result

in a more prominent presence within the street scene than the existing totem, occupying more space, being bulkier in its massing, appearing starker in its dark colour and contrasting more strongly with the lighter paving stones of the footway.

Policy SP1 states that development should make a positive contribution to neighbourhoods of choice including creating well designed places that enhance or create character and protects and enhances the built and natural environment. The nature of this intrusive, taller, bulky, darker feature in the public realm is not considered to make a positive contribution to the neighbourhood or enhance the build environment and is therefore contrary to this policy.

Policy JP-P1 states that development should respect and acknowledge the character and identity of the locality in terms of design, siting, size, scale and materials used. It is considered that the increase in size and scale of the totem, resulting in a taller and bulkier structure, as well as the dark appearance of the material, would be contrary to this policy.

Policy JP-C5 sets out a goal to ensure that streets are welcoming for all. The inclusive of a visually intrusive, taller, bulkier, darker structure in the street scene would not contribute to ensuring that the streets are welcoming for all and therefore be contrary to this policy.

The adoption of the Streets for All Design guidance by the Greater Manchester Combined Authority in November 2023 reinforces the position on reducing street clutter, recommending that in reviewing existing situations, street furniture should be rationalised wherever possible, and clutter removed. As the proposal fails to rationalise street furniture or remove clutter, instead exasperating the street clutter issues in the area, it is therefore not compliant with the Streets for All Design guidance.

While in a different context within the City, it is noted that in an appeal decision for application 142695/FO/2025 (Appeal ref: APP/B4215/W/25/3369446), the Inspector described a similar Street Hub 2 totem model as such:

Due to a combination of its height, width and freestanding position close to the edge of the carriageway, the proposed hub, with its large digital advertisement panels on both sides, would represent a dominant and obtrusive feature on the pavement.

In view of the above, it is not considered that the proposed Street Hub totem represents a like-for-like replacement within the street scene, having a more dominant visual presence than the existing InLink model. Its imposing appearance is considered to detract from the street scene.

Unlike the existing InLink model application approved in 2018, the proposal would not include any removal of neighbouring clutter and provide no visual benefit weighing in favour of the scheme.

Instead, it would work against the decluttering and rationalisation of street furniture that has occurred in this location, constituting a bulkier, more visually dominant item of street furniture which occupies more space than the existing InLink model. In so doing, a more imposing structure would be added to the street scene.

In an appeal decision for application 142705/FO/2025 (Appeal ref: APP/B4215/H/25/3369504) relating to the footpath outside 15 Oldham Road featuring high levels of advertisement and street clutter, the Inspector found that despite 'the largely commercial character of the area... [with] various signs and adverts on nearby buildings' the totem and advertisement's dominant and obtrusive presence would add further visual clutter and result in cumulative harm:

it would add further visual clutter, making this busy pedestrian route a less pleasing place to walk, and its siting close to the edge of the carriageway would only exacerbate its visual prominence and dominance at this busy junction.

The proposed replacement digital totem does not contribute to the rationalisation of on street infrastructure. Instead, it would exacerbate issues associated with street clutter in an already busy city centre environment. As such, the proposal is inconsistent with MCC's decluttering strategy and fails to meet broader design standards and policies.

On the basis of the above it is considered that this intrusive feature would have a negative visual impact upon the built environment and not contribute to positively making a better place for people. The proposal is therefore not considered to be acceptable in terms of visual amenity and contrary to Places for Everyone policies JP-Strat2, JP-C4 and JP-P1, and Core Strategy policies SP1, EN1, and DM1, nor in line with Section 12 of the NPPF.

Heritage Assessment

The historic environment would also be negatively impacted by the installation this totem. This proposed addition would detract from the character of the setting, which does not feature many advertisements, it would also harm long views to the East and West from the site.

Policy EN1 advises that developer's will be expected to consider the City's heritage, including the setting of Listed Buildings. The proposed hoarding would dominate the site thereby detracting from the setting of the Grade II Listed Deansgate Station by virtue of its appearance, scale and materiality.

Policy JP-P2 details the importance of heritage significance to development considerations and the requirement of conservation and enhancement of the setting of heritage assets. Policy EN3 requires that development complements and 'takes advantage of' historic distinctiveness when relevant.' Policy DC19 requires that development does not adversely impact the setting of Listed Buildings.

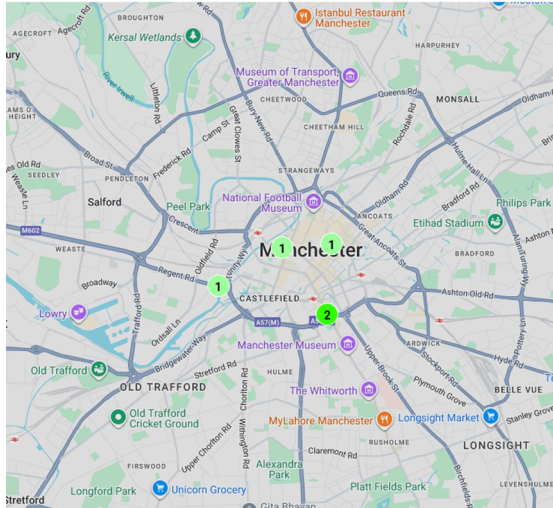
Policy EN3 states that new developments must be designed so as to support the Council in preserving or, where possible, enhancing, the character, setting and accessibility of areas and buildings of acknowledged importance, including listed buildings. This proposal would not preserve or enhance the character or setting of the listed building, due to the introduction of inordinately tall and wide structure that would be a harmful juxtaposition with the heritage asset. The proposed totem would be visible from the curved entryway and the raised rear access point. These elements inform the sense of place in the area. The raised rear access features the same red and blue brick materiality seen on the façade along with sandstone detailing. The Baronial style can be seen clearly at this elevation, with a decorative tourelle with cone detail marking the entrance to the raised ramp. The proposed totem's design and appearance fail to respond to the character of the heritage setting. The development would have a highly modern appearance that would have a harmful visual contrast with the existing palette of the Grade II listed building and detract from its attractiveness and the significance of its setting.

The proposal would therefore fail to sustain or enhance the heritage asset thereby constituting a harmful addition to the setting pursuant to policies EN3, EN1, JP-P2, DC19 and Chapter 16 of the National Planning Policy Framework.

Public Benefit

It is acknowledged that the applicant has set out in supporting documents, the purported public benefits of the advertisement totem. This relates to its function as a telephone unit; it's signposting to third sector organisations, it's data collection (i.e. pedestrian footfall and air pollution) and it's provision of free Wi-Fi.

As can be seen in the below image, the City Centre is currently well served by air pollution monitoring devices that measure at a daily and monthly monitoring.



Existing daily air quality monitoring units within the City Centre.

Mobile phone ownership is widespread, as such it is not expected that many residents will seek out this benefit. Wi-Fi and calling could be provided by a simple pole system, the depth and bulk of the proposal are solely to fulfil its purpose as an advertisement screen which does provide any public benefit. The impact on visual amenity therefore cannot be rationalised by these additional services.

As is set out in Paragraph 215 of the National Planning Policy Framework, a heritage asset's significance must be weighed against public benefit if less than substantial harm to the setting of a heritage structure is proposed.

The proposed public benefits are not unique to the proposal, in addition, they do not necessitate the appearance and scale that give the proposed unit it's incongruous and overly dominant appearance. The less than substantial harm posed to the asset's setting is therefore not acceptable pursuant to Chapter 16 of the National Planning Policy Framework.

Section 66 of the Listed Buildings and Conservation Areas Act 1990 require that special consideration is given to the preservation of the significant fabric and setting of listed buildings. For the reasons outlined above, it is not considered that the proposal preserves the setting of the adjacent listed building causing a low level of less than substantial harm to their setting.

By virtue of the development's adverse visual impacts discussed above, as well as the lack of proven public benefit that would be brought about via the implementation of the proposed works, it is considered that the proposal is contrary to Places for Everyone Plan Policies JP-P1 and JP-P2, Manchester Core Strategy Policies SP1, CC9, EN1, EN3 and DM1, Saved Unitary Development Plan Policy DC19, and the Planning (Listed Buildings and Conservation Areas) Act 1990, which collectively seek to preserve and enhance the visual appearance of the local environment and areas of historical significance.

Highways Impact/ Accessibility / Pedestrian Safety

The pedestrian environment plays an essential role in the Council and National Policy Guidance on street design and sustainable transport.

The proposed totem would be sited in a busy highway that channels Deansgate-Castlefield tram passengers, Deansgate Station passengers, active travel and vehicle movement between the Deansgate area, Castlefield and the Oxford Road Corridor, the street connects Oxford Street, Great Bridgewater Street, Oxford Road, Chester Road and Lower Mosley Street. Paragraph 117 of the NPPF requires that proposals create safe, attractive routes and avoid unnecessary street clutter while responding to local character. Policy DC22 notes that development proposal that would result in 'unacceptable inconvenience' to local pedestrian movement should not be allowed. Policy SP1 outlines the need for development proposals to 'make a positive contribution' to the safety of residents and 'consider the needs of all members of the community'. This is echoed in policy CC10 which mandates 'high standards of accessibility' across space in the City Centre.

The Places for Everyone Joint Development Plan and the Manchester City Council Transport Strategy to 2040 contain the most up to date thinking and strategy for the ongoing enhancement and integration for the Policy JP-C5 and JP-P6 require walking routes are easy to navigate 'safely and without delay, and minimising barriers and obstacles to movement' and are attractive and 'create an incentive to walk and cycle'. The Transport Strategy outlines the Council's goal for walking to be the primary form of transport in Manchester's City Centre. It identifies business, accessibility, pavement width and congestion as challenges.

The proposed change in scale would have a negative impact on pedestrian movement and comfort on the footpath. It would minimise the space provided for pedestrians, worsening congestion during peak times. In addition, when in use the hoarding's obtrusiveness on the pavement would be further compounded by the user, who would add to the width of the totem and further obstruct the footpath. This would hinder the flow of movement and negatively impact the site's accessibility.

The introduction of a cycle lane at this elevation which took place after the 2017 approval constitutes a positive addition to the public realm. MCC's Highway Services note the totems' location adjacent to cycle lane in a busy area could cause pedestrians to 'step out' into the live carriageway or cycle lane. The proposal would therefore be contrary to the Council's strategic goals surrounding accessible and sustainable transportation.

MCC's Environmental Health team have reviewed the scheme are satisfied that with conditions to control visual and aural amenity as well maintenance of the unit they have no expected concerns around public safety.

As these elements could be mitigated via the way of conditions, concerns over these amenity impacts are not sufficient to warrant a refusal on public safety grounds.

Residential Amenity

The totem could potentially be a source of disamenity to nearby occupiers through issues with noise and light nuisance.

Environmental Health advised the luminance levels of the structure could be controlled through a planning condition. This would ensure that the luminance level of the digital display screens can be controlled by a light sensor to adjust the screen brightness to reflect the ambient levels during the daytime and set to a maximum brightness of 600cd/m² during hours of darkness.

Also, the condition would require in the event of breakdown or malfunction, the screen would automatically switch off, and specify that any excessively animated, flashing, scrolling, intermittent or video elements and similar transitions are not allowed, and that the minimum display time for each piece of content on the digital display screens shall be 10 seconds.

In respect to noise, the totem could impact on nearby residents during telephone calls as the totem is not enclosed. To address this, a noise management plan was submitted and the findings of this have been accepted by MCC's Environmental Health team. A verification element report would still have to be conditioned in order to confirm compliance with agreed noise limit.

MCC's Environmental Health team also requested that a management plan shall be submitted to demonstrate how the units will be maintained to ensure the agreed light levels and noise levels are maintained and not exceeded.

Subject to these being resolved satisfactorily via conditions attached to an approval decision, it is considered that there would be sufficient mitigation of any concerns regarding residential amenity and that in residential amenity terms, the proposal would be in accordance with policies SP1 and DM1 of the Core Strategy, and DC26 of the UDP.

Conclusion

As set out above the installation of the replacement totem would not result in any significant concerns to warrant refusal grounds in respect to residential amenity, highways impact and access, or crime and anti-social behaviour.

However, a combination of its height, width, materiality, and appearance, the proposed hub, with its large digital advertisement panels on both sides, would represent a dark, dominant and incongruous structure within the setting of the highly decorative and red brick facades of the Deansgate Station. The structure would read as a modern low-quality addition which would create an unduly harmful juxtaposition within the setting of the listed building and conservation area.

The proposed digital LED totem is therefore unacceptable and refused on the basis of its impact on visual amenity and impact on the setting of a heritage asset and as the public benefits do not outweigh any less than substantial harm caused to heritage assets. The proposal would therefore be contrary to the provisions of policies JP-C5, JP-P1 and JP-P2 of the Places for Everyone Plan, policies SP1, CC9, EN1, EN3 and DM1 of the Manchester Core Strategy (2012), saved policies DC18, DC19 and DC22 of the Unitary Development Plan for the City of Manchester (1995), sections 12 and 16 of the National Planning Policy Framework, and Section 66(1) of the Listed Buildings and Conservation Areas Act 1990.

Other Legislative Requirements

Equality Act 2010

Section 149 (Public Sector Equality Duty) of the Equality Act 2010 requires due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act and; Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it. The Equality Duty does not impose a

legal requirement to conduct an Equality Impact Assessment. Compliance with the Equality Duty involves consciously thinking about the aims of the Equality Duty as part of the process of decision-making.

Human Rights Act 1998 considerations

This application needs to be considered against the provisions of the Human Rights Act 1998. Under Article 6, the applicants (and those third parties, including local residents, who have made representations) have a right to a fair hearing and to this end the local planning authority must give full consideration to their comments.

Protocol 1 Article 1, and Article 8 where appropriate, confer(s) a right of respect for a person's home, other land and business assets. In taking account of all material considerations, including Council policy as set out in the Core Strategy and saved policies of the Unitary Development Plan, the Director of Planning, Building Control & Licensing has concluded that some rights conferred by these articles on the applicant(s)/objector(s)/resident(s) and other occupiers and owners of nearby land that might be affected may be interfered with but that that interference is in accordance with the law and justified by being in the public interest and on the basis of the planning merits of the development proposal. She believes that any restriction on these rights posed by the recommendation given is proportionate to the wider benefits of and that such a decision falls within the margin of discretion afforded to the Council under the Town and Country Planning Acts.

Recommendation: Refuse

Article 35 Declaration

Officers have worked with the applicant/agent in a positive and proactive manner in relation to dealing with the application. Officers have highlighted to the applicant that the proposed works are unacceptable. The development is considered to be contrary to the development plan and therefore refused in a timely manner.

Condition(s) to be attached to decision for approval OR Reasons for recommendation to refuse

1) The proposed totem, by virtue of its siting, scale, materiality, and appearance, would form an overly dominant, incongruous and visually obtrusive feature within the street scene. In addition, the totem would also add to clutter, alongside other street furniture and fixtures, within a prominent and highly visible location in the City Centre. The proposal would have a negative effect upon current efforts by the City Council to de-clutter, regenerate, and improve the public realm and adopted highway within the City Centre environment in the interest of optimising the pedestrian environment and public realm. The proposal would therefore result in an unduly harmful impact on local visual amenity, the character of the street scene, and the setting of the nearby listed Deansgate Station. The totem would be read as a dark, modern and incongruous structure in this setting forming an unduly harmful juxtaposition and low-quality addition to the setting of the listed buildings. This would result in less than substantial harm to the significance of the designated heritage assets and the required public benefits do not exist to outweigh this harm. The totem is therefore contrary to the provisions of policies JP-C5, JP-P1 and JP-P2 of the Places for Everyone Plan, policies SP1, CC9, EN1, EN3 and DM1 of the Manchester Core Strategy (2012), saved policies DC18, DC19 and DC22 of the Unitary Development Plan for the City of Manchester (1995), sections 12 and 16 of the National Planning Policy Framework, and Sections 66(1) and 72(1) of the Listed Buildings and Conservation Areas Act 1990.

2) The proposed totem by virtue of its location close to a busy rail station which regularly accommodates significant levels of pedestrian movement, as well as its scale, footprint, position on the footway and siting adjacent to other items of street clutter would be to the detriment of pedestrian environment, forming a further obstruction along the footway and failing to minimise barriers and obstacles to movement. The proposed totem would therefore be contrary to Places for Everyone Policies JP-Strat2, JP-C5, JP-P6 and JP-P1, Core Strategy Policies SP1, T1 and DM1 and saved UDP Policy DC22; Section 9 of the National Planning Policy Framework; as well as guidance contained within the Streets for All Design Guide 2023.

Appendix 1 – List of consultees & neighbours notified

Highway Services
Environmental Health
Transport For Greater Manchester
Counter Terrorism Policing North West (CTPNW)
Network Rail
GMP - CC Neighbourhood Policing

Arch 90, Hewitt Street, Manchester, M15 4GB
Arch 91, Hewitt Street, Manchester, M15 4GB
Arch 92, Hewitt Street, Manchester, M15 4GB
Arch 91A, Hewitt Street, Manchester, M15 4GB
Rebellion, 2B Whitworth Street West, Manchester, M1 5WZ
Deansgate Railway Station, Deansgate, Manchester, M3 4LG
345 Deansgate, Manchester, M3 4LG
343 Deansgate, Manchester, M3 4LG

Appendix 2 – Planning constraints

Article 4 Direction - City Centre PD Restriction - Class B1(a) To C3
Article 4 Direction - Removal Of PD Rights Change Of Use From Class C3 To Class C4
Coal Authority - Development Low Risk - Name: DEVELOPMENT_LOW_RISK_AREA
Susceptible to Surf Water Flood (Less) -
Susceptible to Surf Water Flood (Less) -
Area Team Boundary - Name: CENTRAL