2 March 2021

PLANNING STATEMENT

APPLICATION FOR EXPRESS PLANNING CONSENT: TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007

Dear Sir/Madam

PROPOSED ADVERTISEMENT DISPLAY: LAND AT EDINBURGH WAY, CORNER OF SANDBROOK WAY, OPPOSITE A627M, ROCHDALE. OL11 2NQ

Please find attached our application for Express Planning Consent as detailed above.

This submission seeks consent for:

"The erection of a single free-standing pole mounted 48 sheet (3m x 6m) digital advertising display, on grassland at the corner of Edinburgh Way and Sandbrook Way, adjacent Sandbrook Park".

The application comprises the following documents and drawings:

- RBCSWEW1 Site plan
- RBCSWEW2 Location plan
- RBCSWEW3 Specification drawings
- Computer Generated Images, at 50M, 55m, 60m of the proposed display, view from the junction with the A627M.
- VN201799 Highway Safety Report
- This Planning Statement

Site Description

The application site is a grassed verge adjacent to the A664 Edinburgh Way, at the corner of Sandbrook Way, adjacent to the 'Sandbrook Park' retail development. It is located on the north side of this four-arm signalised junction, on land between the Edinburgh Way and Sandbrook Way arms. The application site lies around 1.5 miles south of the Town Centre. The proposed advertisement would be viewed by traffic as it enters Rochdale, primarily visible 'head on', to the A627M traffic signal controlled arm. The road layout is wide and expansive. There are a number of vehicle lanes dispersed with grassed verges between, whilst trees are set back from the perimeters of the junction. On the opposite side of the junction is Rochdale's authorised BMW/ Mini Dealership and adjacent to that, visible to traffic as it turns onto the A627m to leave the Town heading towards the M62, are two traditional paper & paste 96-Sheet advertisements, each 3m x 12m.

The area is predominantly commercial, with some of the large retail units at Sandbrook Park, the car dealership and the highway infrastructure being the dominant features in the street scene.

Planning Considerations.

The Regulations, National Planning Policy Framework, and Planning Practice Guidance require that decisions relating to advertisements are made only in the interests of Amenity and Public Safety. Local policies are material considerations but not decisive factors in themselves.

Amenity.

The area has a strong commercial character; dominated by the highway's infrastructure, the Retail Park to the north and the Car Dealership and industrial buildings to the south / south-west. There are residential properties located to the east, however, they are some 80m from the junction. It is not considered that the proposal would have a negative impact on the amenity of the residents in those houses, owing to the large separation and distance from the site to those properties, none of which have windows directly looking towards the illuminated face of the advertisement.

Whilst the proposed advertising display is large in its own right, it would not appear as an over dominant feature in the street scene owing to the expansive and utilitarian nature of the junction. It would be compatible in the area. It would be well separated from the existing advertisements, so there would be no negative cumulative impact / advertisement clutter.

The proposed digital display is well designed; with the advertising unit mounted on a single tubular steel support, painted in grey colour, similar to the lighting columns and steel supports for highway signs and alike in the locality.

The digital unit would display static advertisements which will change no more often than once every 10 seconds. There will be no interactive advertisements, motion, or special effects of any kind. The interval between successive displays will be instantaneous and there will be a mechanism to freeze or switch off the image in the event of a malfunction.

The national planning policy framework (NPPF) and ancillary national planning practice guidelines (NPPG) state that a planning authority should consider the local characteristics of the area. They also make clear that advertisements are less likely to pose an issue if they are within a commercial locality, and outside conservation areas. The location is not in close proximity to any listed buildings, registered or known heritage assets, or within an area of special control.

The proposed structure is in proportion with the scale of the surrounding Highways' and building infrastructure and subject to the appropriate safeguards relating to the level of illumination, the digitally advertisement would not have a detrimental impact in what is an extremely well-lit junction.

Public Safety

National planning guidance suggests that static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted. The historical advertisements adjacent the BMW/Mini Dealerships, facing the A627M, suggest that this locality is one where advertising is not only accepted but one where advertisements can be displayed without having a detrimental effect on Road Safety. Static digitally produced advertisements are now commonplace in numerous urban areas of the country and they have been shown to be no more distracting than other forms of advertising or signage, including Highway signs.

The junction of the A664 Edinburgh Way and the A627M is a strategic and busy junction and we fully understand that when assessing the proposed advertisement from a Public Safety perspective, that the approach should be one of caution. Regard should be had to the effect of a proposed advertisement display on the safe use and operation of the junction by motorists. The vital consideration is whether the proposed advertisement is "likely to be so distracting or so confusing" that it creates a hazard for, or endangers people who are taking reasonable care for their own safety and others safety". It should not be automatically assumed that advertisements will distract drivers. Advertisements are designed to attract the road user but not distract them.

Vectos Highway Safety Report. VN201799.

With regard to the specific Public Safety considerations, I have attached a Highway Safety Report; document VN201799; which has prepared by Vectos, who are a leading consultancy in transport planning and infrastructure design. The report looks at planning policy, planning guidance and best practice. There is a specific and detailed site description and assessment, which looks at the proposed advertisement from each arm of the signalised junction. There is a review of accident data, comparisons to some other digital advertising sites that have been approved and introduced in the vicinity of large signalised junctions elsewhere in the Country, a summary and a conclusion. The conclusion is not just the opinion of the author, it is based on detailed analysis of the proposed advertisement and the Highway Safety implications, to ensure that no conflicts would arise should the display be permitted.

The Key considerations in the report were;

i) Proximity to a traffic signal junction, including a merge from the A627(M);

ii) Proximity to pedestrian crossings;

iii) Proximity to traffic signs;

iv) Existing accident rates at the location

v) Arrangement of the highway layout in the vicinity of the proposal site.

Vectos concluded that the proposed single digital display would not have an unacceptable or severe impact on highway safety and is not therefore contrary to paragraph 109 of the National Planning Policy Framework (February 2019). They were able to factually illustrate why it would not adversely impact on driver distraction, and so would not present a risk to road safety. They considered that there are no significant transport reasons why the development proposal should not be granted planning consent.

I have merely outlined the structure of the report and some of its conclusions. It should be read in full to assess and understand why the proposed display would not be detrimental to Public Safety.

Turning to illumination and operation of the digital unit, the Institute of lighting practitioners (ILP) guidance specifically considers the use of digital technology. It sets recommended maximum luminance levels per surface area which LPAs typically apply in such cases. This guidance recommends that advertisements in urbanised, well lit, areas '*should not exceed 300cd/m^2 at night*' and 600*cd/m^2* during the day. The illumination will be adjusted by light sensors to make the image visible but not overly bright or dazzling in the ambient light.

The display is changed remotely using mobile data control, thus removing the need for our workforce to undertake the potentially hazardous activity of posting from a ladder or elevated platform.

Sustainable Development

The proposal is in accordance with the principals of sustainable development. The digital display is proposed in response to the demand from advertisers for investment in the 'Out of Home' medium, across the Country, for them to be able to advertise in a manner reflective and expected in the 21st Century.

Advertisements contribute to the economic health of the Country by stimulating commerce and to the local economy where the outdoor advertising industry employs people, pays rates to the local authority and rent to landlords.

The advertising copy will be transmitted to the unit using mobile data, preventing the need for weekly visits to change physical poster skins. These skins, whilst theoretically recyclable are not viably so. We can avoid sending tonnes of waste to landfill with this environmentally friendly technology.

Ultimately the unit can easily be removed without leaving a trace and every part of it can be recycled.

Additional Considerations

The display panel would be located on Land within the Ownership of Rochdale MBC and would provide the Council with a valuable marketing opportunity. It could also be used for the display of important public information messages. The digital format allows for the messages or advertisements to be uploaded remotely in a very short space of time.

Summary and Conclusion

For the reasons set out in this planning statement and the full evaluation of Highway Safety undertaken by Vectos, we do not believe that it can reasonably be argued that the proposed advertisement would be detrimental to Amenity or Public Safety.

The proposal is consistent with the themes and objectives of the NPPF and the principles of sustainable development and we are therefore hopeful that Express Planning Consent will be granted, as applied for.

Suggested Conditions

- The maximum level of illumination should not exceed 600cd/m² during daylight hours or exceed 300cd/m² during twilight and night hours (dusk until dawn), in accordance with the terms of the Institution of Lighting Professionals, Professional Lighting Guide 2015 recommendations for maximum luminance (cd/m2).

- The luminance level of the display should be controlled by ambient environmental control, which would automatically adjust the brightness level of the screen to track the light level changes in the environment throughout the day to ensure that the perceived brightness of the display is maintained at a set level.

- The approved display should contain at all times a feature that will turn off the screen (i.e. show a black screen) in the event that the display experiences a malfunction or error.

- No individual advertisement on the LED screen will contain moving images, animation, intermittent or full motion video images, or any images that resemble road signs or traffic signals.

- There shall be a smooth uninterrupted transition from one image to another. Transitions shall be instantaneous, and no individual advertisement shall be displayed for a duration of less than 10 seconds.

Should you require any additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me.

Yours faithfully,

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