

Highway Assessment Report

Council Application Reference No.:

72991 and 72992

Our Reference No.:

BRY-01

Site Address:

Footpath outside, Chicken Cottage, Mill Gate Shopping Centre, Bury BL9 0BL

Proposal:

Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit.

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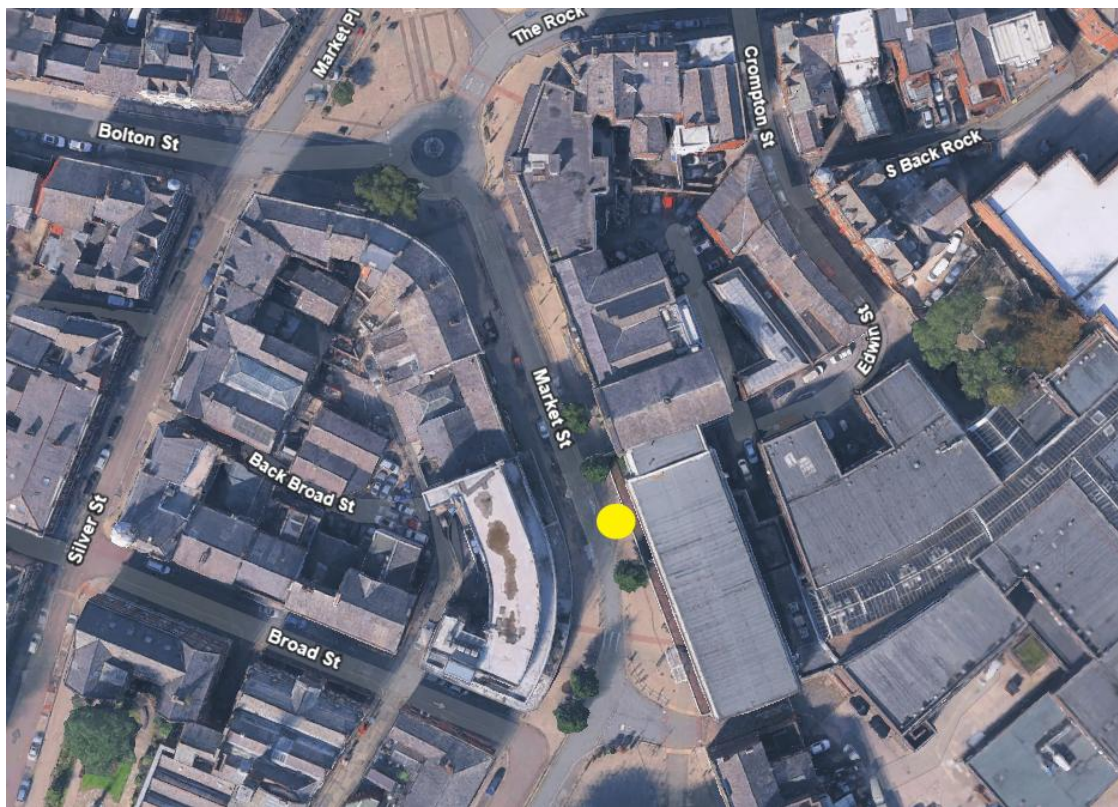
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Introduction

The following Highways Assessment Report has been prepared by Telent on behalf of BT Group plc ('the applicant') in support of the proposal for the installation of 1No. BT Street Hub Unit and associated advertisement panels on the footpath outside, Chicken Cottage, Mill Gate Shopping Centre, Bury BL9 0BL (E: 380428 N: 410729).

The site area is depicted in the ariel image below. The site is positioned on a portion of pedestrian footpath adjacent Market Street which is a single lane carriageway servicing south flowing traffic only. The unit is proposed to be setback 500mm from the kerb line, in line with existing street furniture and is positioned approximately 4.6m from the bus stop to the north. There are no existing traffic lights or signals along this portion of Market Street, however, a pedestrian crossing is present to the south. The unit is proposed to be setback approximately 21.2m from this pedestrian crossing. Notably, there is a bend in the footpath as it approaches the crossing point which would ensure full visibility for approaching vehicles.



Aerial view of site

Proposed Development

The proposal includes the installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit. Specifically, the proposal includes:

- Overall unit dimensions are 35cm deep x 123.6cm wide x 298.6cm high
- Advertising screen dimensions are 95cm wide x 167cm high (1.586sqm total screen area)

- Illumination levels at 5000 cd/m² for daytime and 300cd/m² at night
- 10 second interval advertising displays.

Full detail of the proposed unit and associated advertising displays is depicted in the following supporting documentation submitted with the application:

- Street Hub Product Statement V2.1 (Feb 2025) prepared by BT;
- Street Hub Dimensions Elevations A3 – STH001 prepared by BT; and
- Site Plans and Elevations prepared by BT.

Planning Policy

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Section 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) ('The Regulations') assesses the acceptability of advertisements with regards to their effect on amenity and public safety and specifically states:

Powers to be exercised in the interests of amenity and public safety

- (1) *A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account—*
 - a. *the provisions of the development plan, so far as they are material; and*
 - b. *any other relevant factors.*
- (2) *Without prejudice to the generality of paragraph (1)b. —*
 - a. *factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;*
 - b. *factors relevant to public safety include—*
 - i. *the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);*
 - ii. *the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);*
 - iii. *whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;*
 - iv. *whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.*
- (3) *In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.*

- (4) *Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.*

National Planning Policy Framework (December 2024)

Section 12 of the National Planning Policy Framework (December 2024) ('NPPF') relates to achieving well-designed places. Specifically, paragraph 141 of Section 12 of the NPPF states the following in relation to advertising displays:

"The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts."

Planning Practice Guidance

The Communities and Local Government Planning Practice Guidance ('PPG') contains guidance on advertising developments and the interpretation of amenity and public safety referred to in The Regulations. The PPG states the following with regard to amenity:

"Amenity is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007"

"It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, "amenity" is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement."

The PPG states the following regarding public safety:

"All advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline."

Supporting Documents

Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013

The Transport for London's ('TfL') Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013 ('the TfL Guidelines') is a guiding document for the design and siting of advertising displays. The TfL Guidelines acknowledge assessment is based on a site by site basis, however, Section 4 provides recommendation for best practice assessment which broadly considers the below:

- *Location*
- *Longitudinal Spacing Between Digital Advertisements*
- *Position*
- *Orientation*
- *Minimum Message Display Duration*
- *Display Screen Form and Message Sequencing*
- *The Rate of Change*
- *Information Displayed on the Screen*
- *Lighting*

Professional Lighting Guide 05/23 – The Brightness of Illuminated Advertisements Including Digital Displays

The Institution of Lighting Professionals ('ILP') Professional Lighting Guide 05/23 – The Brightness of Illuminated Advertisements Including Digital Displays (PLG 05/23) details acceptable levels of illumination and frequency of displays in line with road lighting requirements. The recommendations within PLG 05/23 are detailed in Section 10 '*Requirements for illuminated advertisements including digital displays*'. The relevant Environmental Zones for the proposal are E3 (suburban) and E4 (urban).

Table 10.4: Recommended maximum night-time permitted values of display luminance

Light Technical Parameter	Maximum sign luminance (L_s) cd/m ²				
	Environmental zones				
Sign surface area	E0	E1	E2	E3	E4
0 to < 5 m ²	0	25	200	300	300
5 to < 20 m ²	0	0	200	300	300
≥ 20 m ²	0	0	100	200	300

Table 10.5 – Recommended maximum daytime permitted values of sign luminance.

Daylight ambient Illuminance (Eh) [lux]	Sign Luminance [cd/m ²]
Up to 3,500	≤ 400
3,501 to 8,500 (overcast day)	≤ 1,000
8,501 to 15,000 (bright day with cloud cover)	≤ 2,500
15,001 to 25,000 (bright sunny day)	≤ 3,500
25,001 to 42,000 (direct sunlight)	≤ 5,000
42,001 and above	> 5,000

Highway Assessment

The proposed advertising displays are designed and sited to comply with the above regulations and to minimise any impact on public safety, particularly highway safety. A detailed assessment is provided below.

Siting

The proposal has been strategically located in a position that ensures no obstruction or hinderance to the interpretation of any traffic sign or traffic signal. Furthermore, the unit has been positioned following careful consideration of the TfL Guidelines, specifically, the siting achieves the following:

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There is existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads is not complicated, and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

Illumination and Frequency of Displays

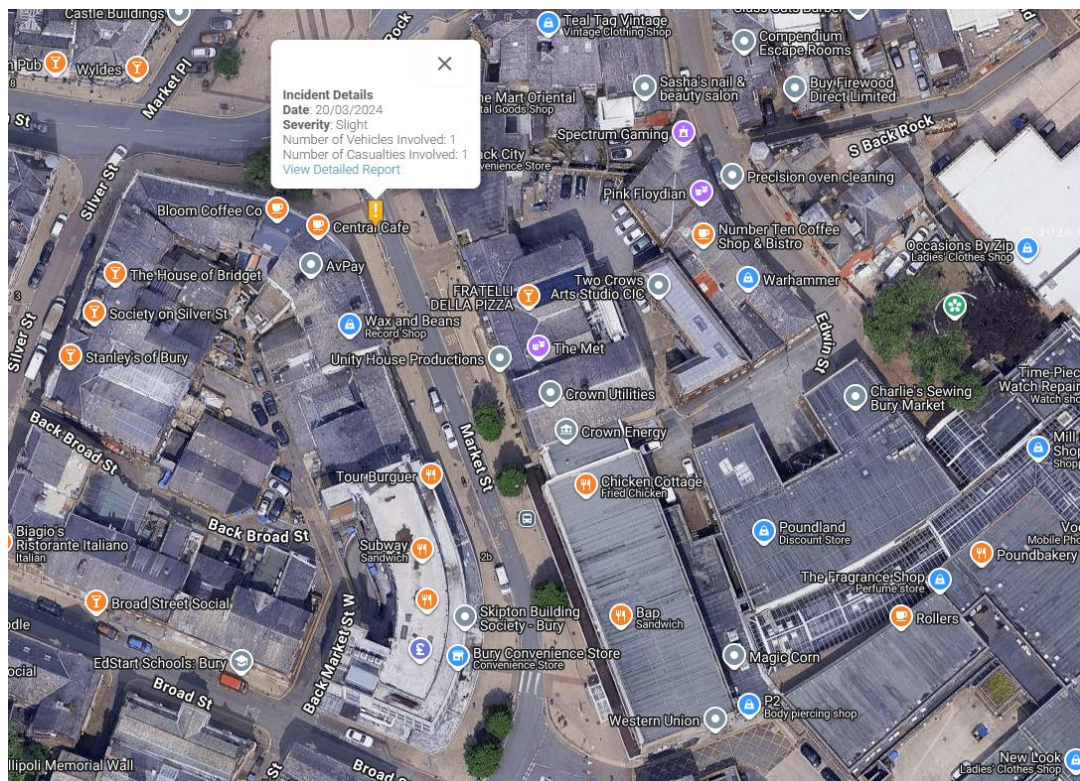
The proposed advertising displays have been designed to ensure full compliance with recommended illumination levels and frequency of displays as outlined in the ILP's PLG 05/23 and the TfL Guidelines. Specifically, the displays achieve the following, as recommended in the relevant guidelines:

- Day time illumination levels at 5000 cd/m²
- Nighttime illumination levels at 300cd/m²
- 10 second interval advertising displays.

It's reiterated that the illumination and displays will not resemble official road traffic signs or traffic lights.

Road Safety Record

CRASHMAP is an online road safety record that provides access to maps and data on road collisions throughout the UK. The CRASHMAP records identify that within that past 3 years, 1 slight incident was recorded to the north of the site in 2024. This incident was recorded as slight and included one vehicle. There are no further incidents recorded in proximity to the site. We refer to the image below which depicts location and severity of the incidents in the area.



[CrashMap aerial image sourced from crashmap.co.uk](https://crashmap.co.uk)

Conclusion

It is evident that the proposed advertising displays comply with all relevant policies and regulations and will not result in any detrimental impact on public safety.

In particular, the location and siting of the displays are consistent with the recommendations set out in the TfL Guidelines, ensuring they do not conflict with or adversely affect traffic conditions or road safety.

The levels of illumination and frequency of displays adhere to the standards outlined in the ILP's PLG 05/23 guidance. As such, the displays are not expected to cause distraction or confusion for drivers.

The road safety record indicates there are no prominent highway safety concerns within close proximity of the application site, evident in the low incidence of recorded accidents on the CRASHMAP database. This supports the conclusion that the installation of the compliant advertising displays will not pose a risk to highway safety.

Overall, it's considered that the advertising display will have no material impact on driver distraction, highway safety or public safety.