

PROPOSED LED SCREEN ADVERT, FORMER GILLBRIDGE POLICE STATION, SUNDERLAND

TRANSPORT STATEMENT

IDENTIFICATION TABLE

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1. INTRODUCTION

1.1 Context

1.1.1 SYSTRA Ltd. (SYSTRA) has been appointed by Lichfields to prepare a Transport Statement to accompany the planning application for the development of an LED screen advertisement on the former Gillbridge Police Station in Sunderland. The application is made pursuant to The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, which sets out the procedures relating to the displaying of advertisements in England.

1.2 Purpose of the Transport Statement

1.2.1 It is noted by the National Planning Policy Framework (July 2021) (NPPF) that advertisements should be subject to control only in the interests of amenity and public safety. This Transport Statement, therefore, will consider the traffic and transport related impacts associated with the proposed LED screen, highlighting any potential safety concerns that may arise.

1.2.2 This Transport Statement is structured as follows:

- Section 2: Proposal
- Section 3: Policy and Guidance;
- Section 4: Existing Conditions
- Section 5: Visibility

2. PROPOSAL

2.1.1 It is proposed that an LED advertising screen (the development) will be located on the north-eastern corner of the office building [the Yard] on the site of the former Gillbridge Police Station located adjacent to the A183 on Gillbridge Avenue, Sunderland, SR1 3AW. The location of the proposed development is indicated in **Figure 1**.



Figure 1. Proposed development site location



3. POLICY AND GUIDANCE

3.1.1 The following national policy documents have been considered in the preparation of this Transport Statement:

- National Planning Policy Framework (July 2021) (NPPF);
- Town and Country Planning (Control of Advertisement) (England) Regulations 2007;
- Planning Practice Guidance (2021);
- Sunderland City Council Development Management Supplementary Planning Document (June 2021); and
- Institute of Lighting Professionals guidance note PLG05 – The Brightness of Illuminated Advertisements.

3.2 National Planning Policy Framework (July 2021) (NPPF)

3.2.1 The NPPF identifies the key policy test for advertising in paragraph 136:

“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.”

3.3 Town and Country Planning (Control of Advertisement) (England) Regulations 2007

3.3.1 The Town and Country Planning (Control of Advertisement) (England) Regulations 2007 [the regulations] sets out the procedures relating to the displaying of advertisements in England. The Regulations for advertisement control dictate that all adverts require express consent from the Local Planning Authority (LPA).

3.3.2 The proposed development constitutes a Class 4(b) (Illuminated advertisements on business premises) advertisement under Schedule 3 of the regulations.

“Class 4(b): An illuminated advertisement, other than one falling within Class 4A, displayed on business premises wholly with reference to any or all of the following: the business carried on, the goods sold or services provided, or the name or qualifications of the person carrying on the business, or supplying the goods or services, on those premises.”

3.3.3 A number of ‘Conditions and limitations’ are listed that apply to Class 4(b) advertisements, the following have been identified as transport related:

“(d) It may not project over any carriageway”.

3.3.4 The LED screen will be situated approximately 10m from the nearest carriageway; it is therefore considered that the development accords with this regulation.

3.4 Planning Practice Guidance: Advertisements (2021)

3.4.1 The Planning Practice Guidance [PPG] (2021) sets out advice when considering the implementation of advertisements.

3.4.2 Paragraph 067 of the PPG highlights the locations that advertisements are more likely to affect public safety on the roads:

“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.”

3.4.3 We will discuss in section 4.3, that the road network in the vicinity of the development is not one where drivers “need to take more care”, or where there are existing highway safety concerns that would be exacerbated by the LED screen.

3.4.4 The sign is deemed to be a business sign located on an office block, and is therefore considered to be less likely to result in road safety problems as noted in the Paragraph 067 of the ‘PPG: advertisements’.

3.4.5 Paragraph 067 further states that the main types of advertisement which “may cause danger” to road users are:

- (a) those which obstruct or impair sight-lines at corners, bends or at a junction, or at any point of access to a highway;
- (b) those which, because of their size or siting, would obstruct or confuse a road-user’s view, or reduce the clarity or effectiveness of a traffic sign or signal, or would be likely to distract road-users because of their unusual nature;
- (d) those externally or internally illuminated signs (incorporating either flashing or static lights) including those utilising light emitting diode technology:
 - i. where the means of illumination is directly visible from any part of the road
 - ii. which, because of their colour, could be mistaken for, or confused with, traffic lights or any other authorised signals
 - iii. which, because of their size or brightness, could result in glare and dazzle, or distract road-users, particularly in misty or wet weather; or
 - iv. which are subject to frequent changes of the display
- (e) those which incorporate moving or apparently moving elements in their display, or successive individual advertisements which do not display the whole message;
- (f) those requiring close study (such as Public Information Panels), which are situated so that people looking at them would be insufficiently protected from passing vehicles; or those advertisements sited on narrow footpaths where they may interfere with safe passage by causing pedestrians to step into the road;
- (g) those which resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984, and may therefore be subject to removal by the traffic authority under section 69 of that Act, for example:

- i. those embodying red circles, crosses or triangles, or any traffic sign symbol; or those in combinations of colours which might otherwise be mistaken for traffic signs; or
 - ii. those incorporating large arrows or chevrons with only the arrow or chevron made of retroreflective material or illuminated, causing confusion with similar signs in use at, or approaching roundabouts.
- (h) those which embody directional or other traffic elements and which need special scrutiny because of possible resemblance to, or confusion with, traffic signs; for example, advertisements which:
- i. contain a large arrow or chevron (or have a pointed end and have only a few words of message);
 - ii. invite drivers to turn right on a main road, or where there is fast moving traffic;
 - iii. invite drivers to turn, but are sited so close to the turning that there is not enough time to signal and turn safely; or
 - iv. are so close to similar advertisements, or official traffic signs, that road-users might be confused in the vicinity of a road junction or other traffic hazard.

3.4.6 The proposed LED screen will not obstruct or impair a road users view. The illumination of the sign will not exceed 600 cdm^{-2} , which is considered to be the maximum permitted luminance level, and therefore will not result in glare or dazzle.

3.4.7 The LED screen will not resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984, and will adhere with the standards stated in point g(i)/(ii) and h(i)/(ii)/(iii)/(iv).

3.4.8 Consequently, the development will not impair the a road users view and will not reduce the effectiveness of existing road signs or traffic management instructions; it is therefore considered that the development accords with this policy.

3.5 Sunderland City Council Development Management Supplementary Planning Document (June 2021)

3.5.1 Within Section 5 of the Sunderland City Council Development Management Supplementary Planning Document (2021), additional planning guidance applying to advertisements is provided.

3.5.2 The section is largely influenced by guidance from the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, as such, the majority of the policy has already been discussed, with an emphasis on road safety:

“With regard to road safety, advertisements located at places where motorists need to take more care, such as roundabouts, junctions, pedestrian crossings, bridges and level crossings, are more likely to negatively affect public safety.”



3.6 Institute of Lighting Professionals guidance note PLG05 – The Brightness of Illuminated Advertisements

3.6.1 The Institute of Lighting Professionals guidance note PLG05 – The Brightness of Illuminated Advertisements sets out the principles for illuminated signs' brightness.

3.6.2 The maximum permitted luminance levels are shown in **Table 1** extracted from PLG05.

Illuminated area	Maximum luminance (cdm⁻²)
More than 10 m ²	300
Not more than 10 m ²	600

3.6.3 The maximum permitted luminance levels are shown in **Table 1** relate to urban areas.

3.6.4 The luminance level of the LED screen will not exceed 600 dm⁻² and will therefore fall within the luminance limits allowed in England.

4. EXISTING SITUATION

4.1 Site location

4.1.1 As is shown in **Figure 1**, the site is located to the south of the A183 within Sunderland. **Figure 2** highlights the location of the LED screen in relation to the former Gillbridge Police Station.



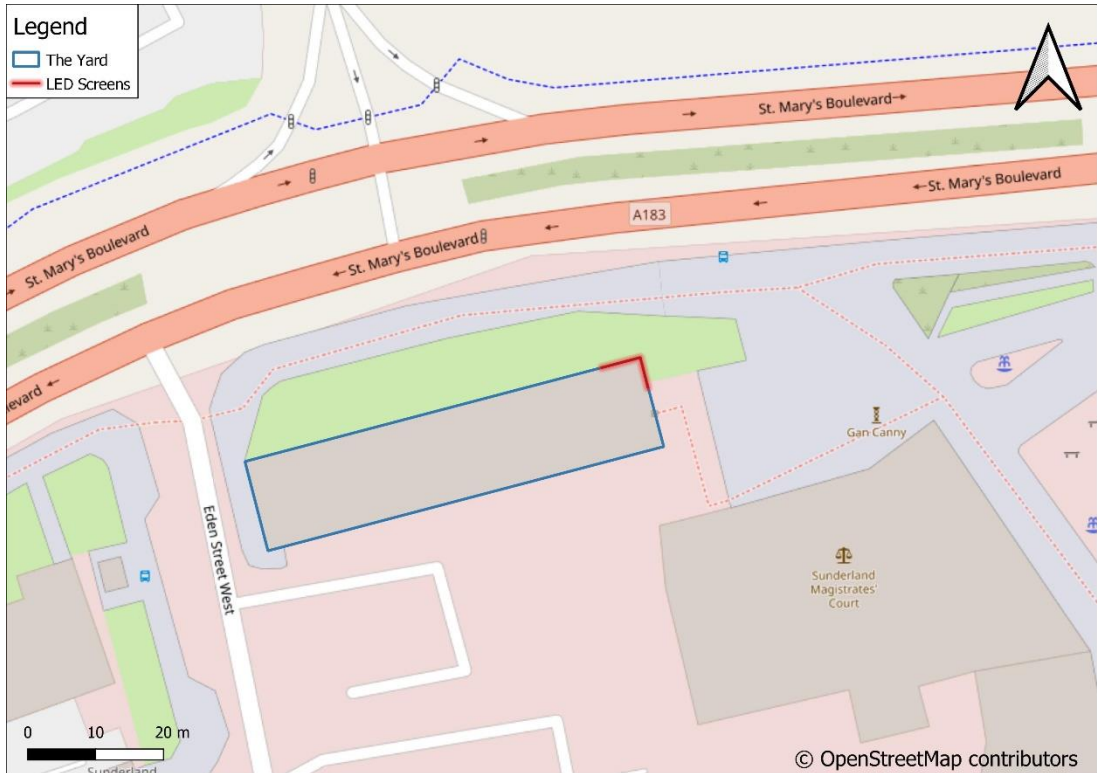


Figure 2. LED screen location in relation to former police station

- 4.1.2 As can be seen in **Figure 2**, the LED screen will return around the north-eastern corner of the former police station, with aspects to the north and east simultaneously.
- 4.1.3 The Yard is the site of former police station and is now offices accommodation. An indicative image of the LED screen can be seen in **Figure 3**.



Figure 3. Indicative LED screen design options

- 4.1.4 It is envisaged that the proposed screen will be primarily viewed from the A183, Plater Way and surrounding footways.



4.1.5 The screen will be located approximately 10m south of the westbound carriageway of the A183 and 30m south-east of the A183 / Plater Way junction.

4.2 Local Highway Network

4.2.1 The site in context with the local area and highway network is shown **Figure 4**.

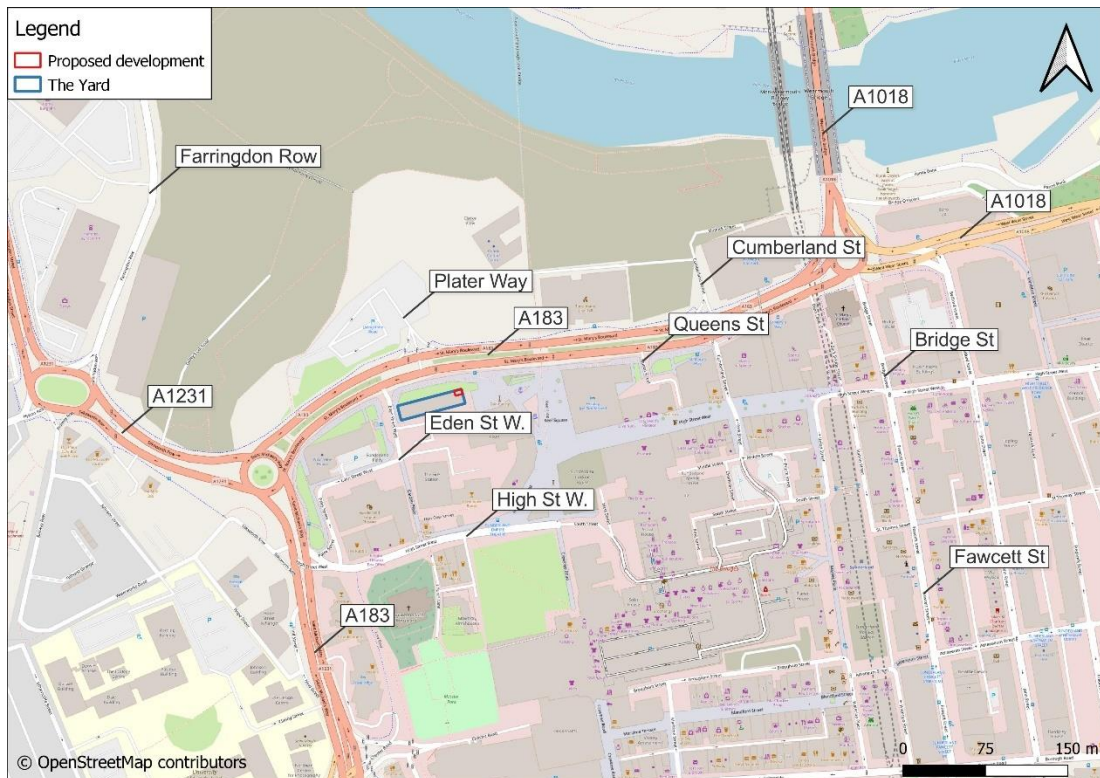


Figure 4. Site in context of local highway network

4.2.2 The LED screen faces the A183, which runs in a east/west direction to the north of the development and is subject to a 30mph speed limit. Routing east, the A183 meets the A1231 at the A1231/A183 unsignalised roundabout; routing west, it meets the A1018 at the A1018/A183 signalised roundabout.

4.2.3 Along the A183, past the development between the A1018 and the A1231 junctions, there are three of adjoining roads including Cumberland Street, Queens Street and Plater Way.

4.3 Collisions

4.3.1 SYSTRA has obtained Personal Injury Collision (PIC) data from CrashMap that includes the most recently available five-year period for the study area.

4.3.2 The PIC assessment study area for the analysis, as shown in **Figure 5**, includes the roads identified within **Figure 6** within the sight lines of the development.



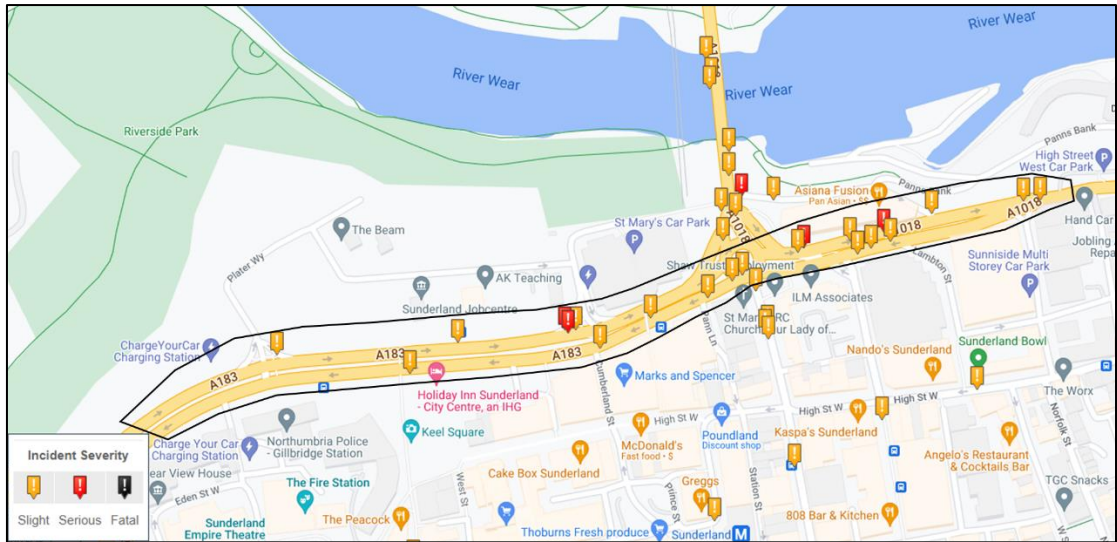


Figure 5. PIC data 2017-2021 (source: CrashMap)

4.3.3 A total of 19 collisions were recorded in the study area within the period of interest, with 16 classified as ‘slight’ and 3 as ‘serious’. The years in which the collisions occurred is provided in **Table 2**.

Table 2. PIC summary

CATEGORY	2017	2018	2019	2020	2021	TOTAL
Slight	1	6	3	3	4	17
Serious	1	1	1	1	-	4
Fatal	-	-	-	-	-	0
Total	2	7	4	4	4	21

4.3.4 As can be seen from **Figure 5**, only 3 collisions occurred at any one arm of any junction within the study area, which equates to less than one per year, demonstrating that there are no clusters of collisions during the assessment period. Two serious collisions occurred at the A183/Cumberland Street junction, however, these both occurred to vehicles travelling eastbound and therefore had already past the Yard and out of sight of the LED screen.

4.3.5 Consequently, it is evident that there are no areas of particular concern within the vicinity of the proposed development regarding highway safety.

5. VISIBILITY

5.1.1 In this section, the visibility of the LED screen from the highway network is analysed. **Figure 6** highlights the approximate theoretical area within the sight lines of the LED screen.



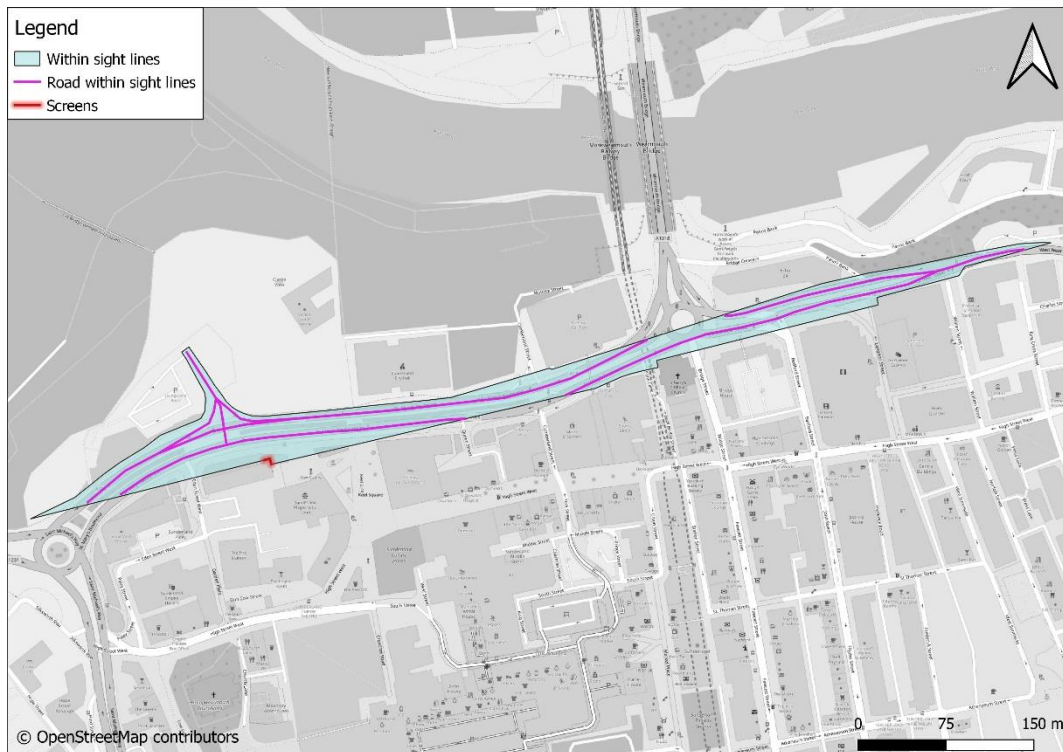


Figure 6. Approximate area within sight lines of LED screen

- 5.1.2 As can be seen in **Figure 6**, from east to west approximately 830m of highway, including the A183 and A1018, is within the area within the sight lines.
- 5.1.3 Albeit, theoretically, the LED screen is within the sight-lines of the A1018, to the east of the A1018/A183 roundabout, as discussed later within this section, it is not considered to be within a distance that drivers can readily see or distinguish the content of the advertisement.
- 5.1.4 The LED screen will be visible from the A183 approaching the Yard from both directions, however, as discussed, it is considered to comply with the policy set out in **Section 2**.

5.2 East of the A1018 / A183 Roundabout

- 5.2.1 **Figure 7** shows the LED screen visibility when travelling westbound on the A1018. The location of the **Figure 7** is approximately 615m east of the proposed LED screen.



Figure 7. Farthest eastern point within sight lines of LED screen (source: Google Maps)

- 5.2.2 As can be seen from **Figure 7**, a relatively small section of the corner of the building where the LED screen will be situated can be seen but the LED is mostly obscured by the existing pedestrian overpass.
- 5.2.3 Moreover, at 615m, the LED screen is considered to be at a distance where it will be too small to distinguish when driving. Therefore, from this location, the LED screen is considered to be in line with policy, as it does not impair the a road users view and will not reduce the effectiveness of existing road signs or traffic management instructions

5.3 A1018 / A183 Roundabout

- 5.3.1 **Figure 8** shows the LED screen visibility from the eastern approach of the A1018/A183 roundabout. The location of the **Figure 8** is approximately 390m east of the proposed LED screen and 230m east of the A1018/A183 roundabout.





Figure 8. Eastern approach A1018/A183 roundabout (source: Google Maps)

- 5.3.2 Similarly, as can be seen from **Figure 8**, a relatively small section of the corner of the building where the LED screen will be situated can be seen beneath the pedestrian overpass.
- 5.3.3 Again, at 390m distant from the sign, the LED screen is considered to be too small to distinguish when driving. Therefore, from this location, the LED screen is considered to be in line with policy, as it does not impair the a road users view and will not reduce the effectiveness of existing road signs or traffic management instructions.

5.4 A183 Approach

Eastbound Approach

- 5.4.1 **Figure 9** shows the LED screen visibility from the eastbound approach of the building on the A183. The location of the **Figure 9** is approximately 100m west of the proposed LED screen.



Figure 9. A183 eastbound approach to LED Screen (source: Google Maps)

- 5.4.2 As can be seen in Figure 9, the LED screen can be seen but is unlikely to be legible. In addition, the tree canopy obscures much of the building, including the view of the screen during Spring/Summer. At 100m distant, and given the angle at which the screen is positioned on this section of the A183, it is considered that the content of the LED screen will be difficult to distinguish.
- 5.4.3 **Figure 10** shows the LED screen visibility from the eastbound approach of the building on the A183 at the junction with Plater Way. The location of the **Figure 10** is approximately 55m north-west of the proposed LED screen.

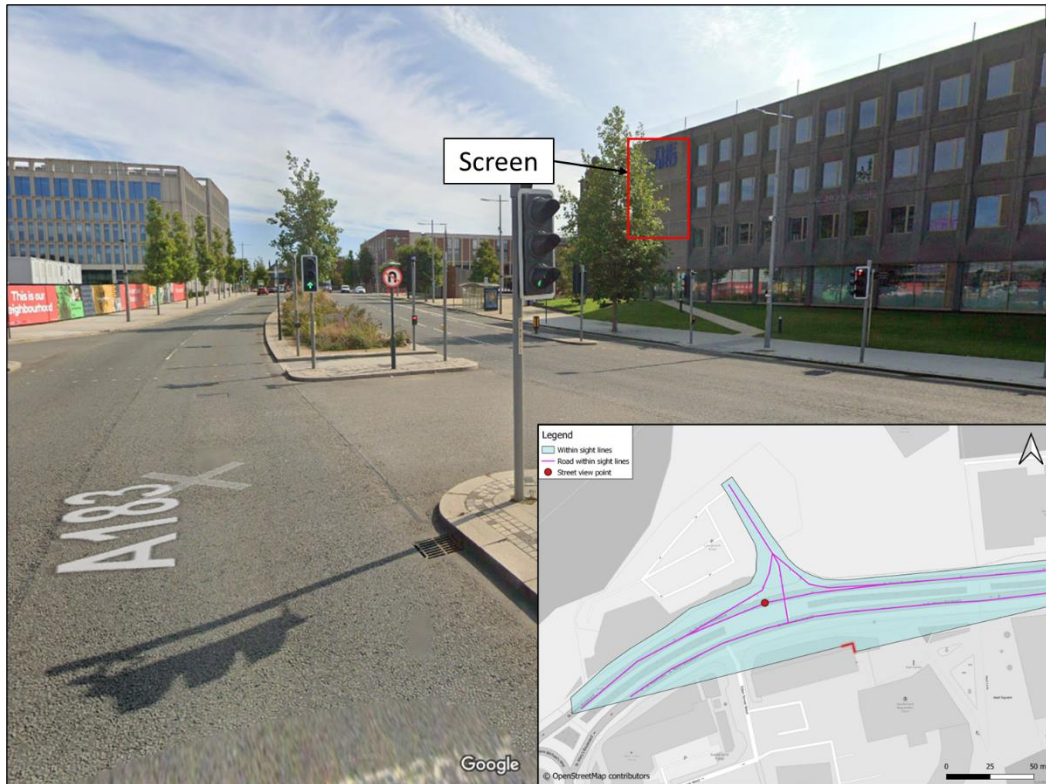


Figure 10. A183 eastbound approach to junction with Plater Way (source: Google Maps)

- 5.4.4 As can be seen in **Figure 10**, the LED screen can be seen whilst stationary at the stop line, however, the tree canopy obscures a section of the building, including the view of the screen during Spring/Summer.
- 5.4.5 Although the LED screen can be seen from the A183 / Plater Way junction, the junction, as shown in Section 4.3, does not currently experience a high level of collisions, and is therefore considered to not be a place where local conditions present existing traffic hazards.

Westbound Approach

- 5.4.6 **Figure 11** shows the LED screen visibility from the westbound approach of the building on the A183 at the pedestrian crossing. The location of the **Figure 11** is approximately 90m to the east of the proposed LED screen.



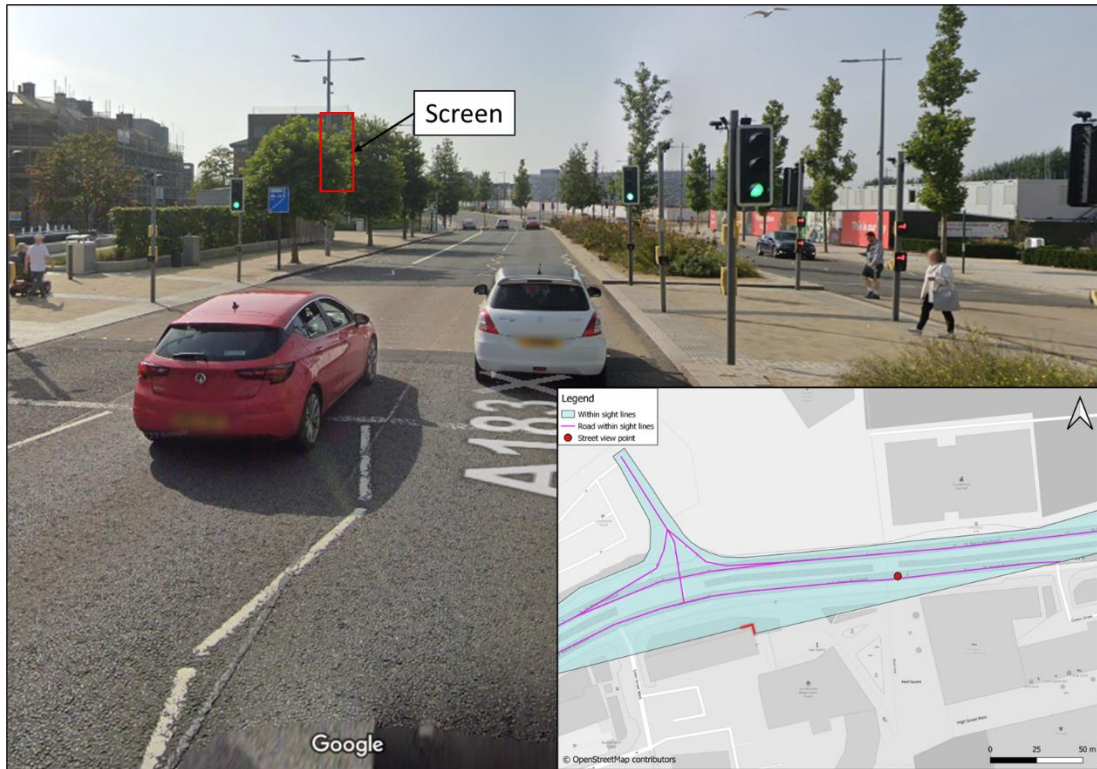


Figure 11. A183 westbound approach to LED Screen (source: Google Maps)

- 5.4.7 As can be seen in **Figure 11**, the LED screen can be seen, however, tree cover obscures the view of the screen during Spring/Summer, demonstrating that the LED screen will unlikely be confused with any traffic signal. Furthermore, the LED screen is approximately 85m west of the pedestrian crossing set 10m back from the carriageway.
- 5.4.8 Although the LED screen can be seen, as shown in Section 4.3, the pedestrian crossing has not experienced any collisions, and is not, therefore, a location where local conditions present existing traffic hazards.
- 5.4.9 **Figure 12** shows the LED screen visibility from the westbound approach of the building on the A183 at the junction with Plater Way. The location of the **Figure 12** is approximately 20m north-east of the proposed LED screen.

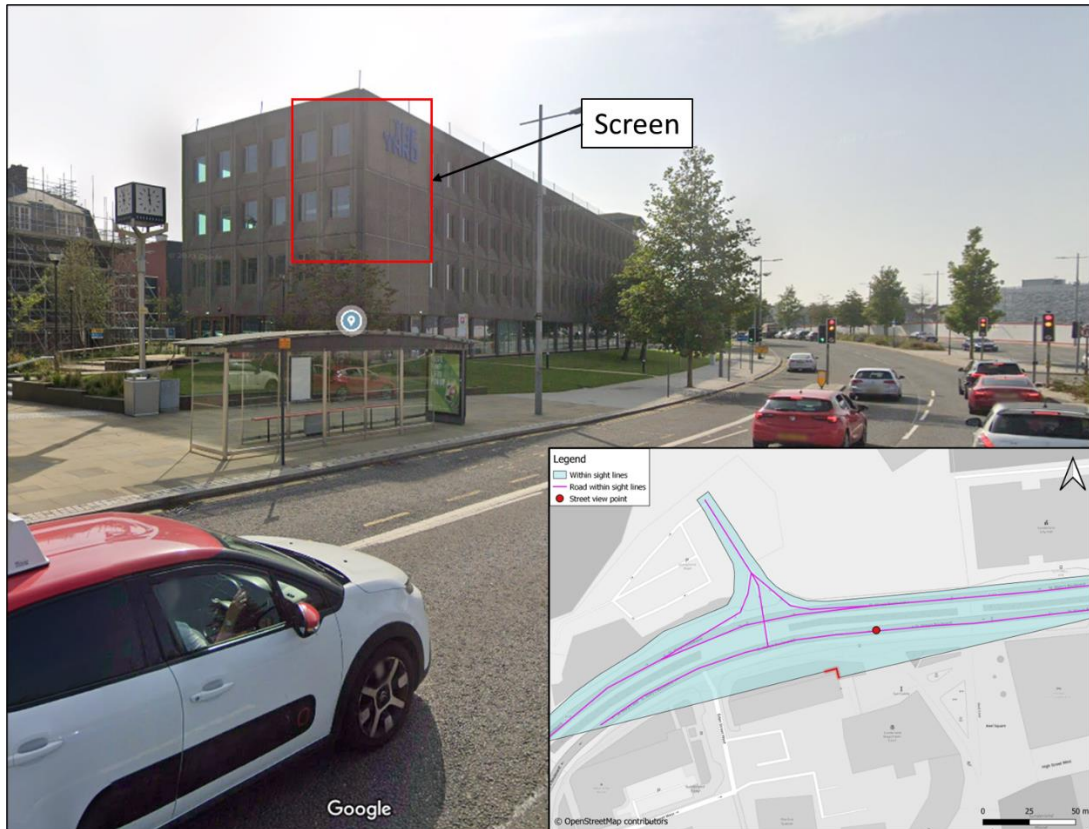


Figure 12. A183 westbound approach to junction with Plater Way (source: Google Maps)

5.4.10 The LED screen will be prominent from this location and will be seen from the A183 / Plater Way junction, as shown in **Figure 12**. However, as shown in Section 4.3, the location does not currently experience a high level of collisions, and is considered to not be a place where local conditions present existing traffic hazards.

5.4.11 Furthermore, there is currently illumination of other signs such as the bus shelter and clock tower within the vicinity of **Figure 12**.

Plater Way Approach

5.4.12 **Figure 13** shows the LED screen visibility from the Plater Way approach of the A183 / Plater Way junction. The location of the **Figure 13** is approximately 60m north-east of the proposed LED screen.



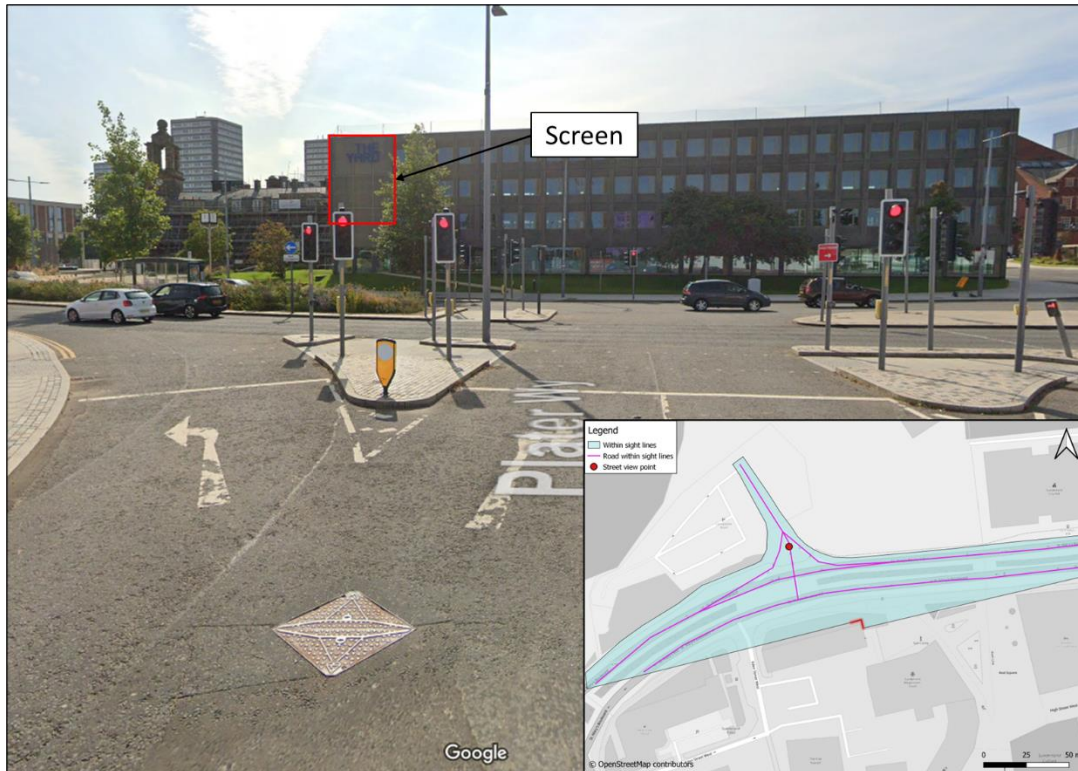


Figure 13. Plater Way approach to junction with A183 (source: Google Maps)

5.4.13 Again, the LED screen will be prominent, as can be seen from **Figure 13**, the junction. However, in Section 4.3 we demonstrated that the location does not currently experience a high level of collisions, and is considered, therefore, not to be a location where local conditions present existing traffic hazards.

5.4.14 The size of the sign also precludes confusion with traffic signals albeit it is acknowledged that the sign will be in the sightline towards the signals heads, particularly on the left turn.

5.5 Visibility Summary

5.5.1 In summary, the LED screen is expected to comply with the policies set out within Section 2. The LED screen is situated approximately 10m from the nearest carriageway and, therefore, does not project over the road and obstruct drivers visibility.

5.5.2 From east of the A1018/A183 junction and the junction itself, the LED screen is considered to be at a distance where it will be too small to distinguish when driving and, therefore, cannot impair the a road users view and will not reduce the effectiveness of existing road signs or traffic management instructions.

5.5.3 Although when approaching the Yard from the A183 and Plater Way the LED screen can be seen from the carriageway, the screen will be obscured from multiple directions by the treescape in Spring/Summer and it is not considered to be in a location where local conditions present existing traffic hazards.



6. SUMMARY & CONCLUSION

- 6.1.1 SYSTRA Ltd. (SYSTRA) has been appointed by Lichfields to prepare a Transport Statement to accompany the planning application for the development of an LED screen advert on the former Gillbridge police station in Sunderland.
- 6.1.2 The proposed LED screen development application is made pursuant to The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, which sets out the procedures relating to the displaying of advertisements in England.
- 6.1.3 It is proposed that an LED advertising screen will be located on the north-eastern corner of the Yard on the site of the former Gillbridge police station located adjacent to the A183 on Gillbridge Avenue, Sunderland, SR1 3AW.
- 6.1.4 The sign is deemed to be a business sign located on an office block, and is therefore considered to be less likely to result in road safety problems as noted in the Paragraph 067 of the 'PPG: advertisements'.
- 6.1.5 The proposed LED screen will not obstruct or impair a road users view. The illumination of the sign will not exceed 600cdm^{-2} , which is considered to be the maximum permitted luminance level, and therefore will not result in glare or dazzle.
- 6.1.6 Only 3 collisions have occurred at any one arm of any junction within the study area, which equates to less than one per year, demonstrating that there are no clusters of collisions during the assessment period. It is, therefore, evident that there are no areas of particular concern within the vicinity of the proposed development regarding highway safety.
- 6.1.7 Overall, the LED screen is expected to comply with the policies set out within Section 2. The LED screen is situated approximately 10m from the nearest carriageway and therefore does not project over the road and obstruct drivers visibility.
- 6.1.8 From east of the A1018/A183 junction and the junction itself, the LED screen is considered to be at a distance where it will be too small to distinguish when driving and therefore cannot impair the a road users view and will not reduce the effectiveness of existing road signs or traffic management instructions.
- 6.1.9 Although when approaching the Yard from the A183 and Plater Way the LED screen can be seen from the carriageway, however, it will be obscured from multiple directions by vegetation in Spring/Summer and this is not considered to be in a location where local conditions present existing traffic hazards.



