



Armstrong Planning

PLANNING STATEMENT

On behalf of

King Media Ltd

for

**Advertisement Consent for Temporary Display of an Externally
Illuminated Shroud-Advertisement set within an Illustrated Scaffold
Shroud (PP-11226624)**

at

36 Charlotte Street, Manchester, M1 4FD

29th April 2021



Introduction

Armstrong Planning, with offices at The Old School House, Dartford Road, March, Cambs, PE15 8AE, has been retained by the applicant, King Media Ltd, to submit this application for advertisement consent for the temporary display of an externally illuminated shroud-advertisement (22.3m wide x 8.3m high) wrapping the corner of Charlotte Street and Portland Street, set within an illustrated scaffold shroud (for a temporary period of 12 months) at the 36 Charlotte Street, Manchester, M1 4FD.

This application for advertisement consent is being submitted in relation to an application for Listed Building Consent (Ref: 131470/LO/2021), which was submitted in August 2021 and is due to be determined imminently. The scheduled building works will help sustain the heritage value of the listed building and ensure that it can continue to contribute positively to the character of the area. Revenue raised by the commercial display will help subsidise the cost of the repair and maintenance works, and we respectfully ask the planning department to support this application.

The Application Site and Allocations

Fraser House, at 36 Charlotte Street, Manchester, M1 4FD, is a 4 storey over basement building located at the northwest corner at the junction of Charlotte Street and Portland Street, in commercial use.

The surrounding area is busy, vibrant and commercial in character. The street scene is heavily dominated by vehicular traffic.

The application site is a Grade II listed building and is identified as falling within the George Street Conservation Area. As stated above, a Listed Building Consent application has been submitted in respect of proposed building works.

The Proposal

Essential roof and facade repairs are scheduled to take place at the application site, for which scaffolding is required. This application is seeking advertisement consent for a static, externally illuminated shroud-advertisement (22.3m wide x 8.3m high) wrapping the corner of Charlotte Street and Portland Street, set within an illustrated scaffold shroud depicting a 1:1 facsimile of the building imagery.

It is proposed that the shroud and advertisement will cover the scaffolding while works are taking place, shielding the public from unsightly works. The advertisement, shroud and scaffolding will be removed upon completion of the works, within a period of 12 months. Please see the accompanying Programme of Works document submitted as part of this application.

This illustrated shroud will consist of a high-quality material and will be maintained to a high standard, this will help mitigate the negative impact of the necessary scaffolding and building works on the visual amenity of the area, as well as the setting of the Conservation Area and listed buildings in the vicinity.

Policy Compliance

National Policy



Paragraph 132 of the revised National Planning Policy Framework (NPPF) states that *“advertisements should be subject to control only in the interests of amenity and public safety.”* The NPPF sets out a presumption in favour of sustainable development and promotes the positive improvement of the built environment; it encourages local planning authorities to work with applicants to foster a positive approach to planning.

Paragraph 38 of the revised NPPF states that *“Local planning authorities should approach decisions on proposed development in a positive and creative way”,* and that local planning authority should *“work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

Paragraph 18b-005 of the Planning Practice Guidance accompanying the NPPF specifically relates to shroud and banner advertisements and states that *“buildings which are being renovated or undergoing major structural work and which have scaffolding or netting around them may be considered suitable as temporary sites for shroud advertisements or large ‘wrap’ advertisements covering the face, or part of the face, of the building.”*

Paragraph 192 of the NPPF concerns ‘conservation’ and states that in determining planning applications LPAs should take account of the *“desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.”* The building being a Grade II listed building is considered a heritage asset. The application site also falls within the George Street Conservation Area. Advertising is a viable use that can assist in subsidising conservation works thereby sustaining the significance of the heritage asset.

Local Policy

The Citywide Development Control Policies of the extant UDP set out detailed development control policies for Manchester City.

Policy DC15.1 concerns ‘Advertisements, Hoardings and Posters’ and states that *“In determining applications for free standing hoardings and wall mounted posters the Council will take account of the following matters in assessing these interests:*

- a) the general location of the proposed development and the effect on visual amenity;*
- b) the scope for posters and hoardings to make a positive contribution to the locality;*
- c) the design of the structures, and the relationship with any premises on which they are located;*
- d) the effect of the proposal on permanent redevelopment of the land;*
- e) public safety resulting from the positioning of the design of the display;*
- f) the ease with which the structure is capable of being satisfactorily maintained;*
- g) the use of hoardings to screen vacant sites or buildings during development, or where development is known to be imminent;*
- h) the use of hoardings as part of a scheme to prevent access by unauthorised users onto land pending development;*
- i) the use of hoardings to disguise or improve the appearance of unsightly features, operations or activities;*
- j) the number of advertisements in the locality and their cumulative effect on visual amenity.”*

Policy DC15.2 states that *“In assessing the interests of amenity and safety the Council will take account of the following criteria:*

- a) developments of this kind should not harm the character or architectural features of a building, nor interfere with its proper use;*



- b) they should be in scale with the locality and relate properly to the site on which they stand;*
- c) they should be unobtrusive and should not intrude into residential neighbourhoods and areas of high amenity value;*
- d) a proposal which would be injurious to public safety or adversely affect the flow of traffic, by reason of its position, size, or design will not be permitted."*

Policy DC15.3 states that *"Where, having regard to the preceding policies, the Council considers the proposed development to be acceptable in principle, conditions may be imposed in order to protect safety and amenity."*

Policy DC18.1 concerns 'Conservation Areas' and states that *"The Council will give particularly careful consideration to development proposals within Conservation Areas."*

a. The Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering the following issues:

- i. the relationship of new structures to neighbouring buildings and spaces;*
- ii. the effect of major changes to the appearance of existing buildings;*
- iii. the desirability of retaining existing features, such as boundary walls, gardens, trees, (including street trees);*
- iv. the effect of signs and advertisements;*
- v. any further guidance on specific areas which has been approved by the Council."*

We submit that the proposed development is fully compliant with the policy context outlined above.

Impact on Amenity

The site falls within George Street Conservation Area and the building on-site is Grade II listed building. The Council will consider the effect of the advertisement in the Conservation Area and on the listed building.

The proposed advert will not harm the character of the area or architectural features of the building, it will, in fact, safeguard visual amenity as the illustrated shroud will shield public view from unsightly building works and scaffolding while works are taking place, helping to mitigate the negative impact of the necessary scaffolding and building works on the visual amenity of the area.

The shroud will be far superior in quality and design to the typical builder's plastic sheeting that would otherwise be used if advertisement consent was not being sought. Such alternative generic sheeting has the potential to become ragged and unsafe and is not usually as well maintained as shrouds bearing advertisements. This aspect should be considered a net positive impact on visual amenity.

The proposed commercial display is framed within a 1:1 facsimile of the building facade, this will ensure that the host building will be read first and foremost with the advertisement appearing as a secondary and subordinate feature. The effect of which is that the sense of the building in its streetscape will be retained.

We submit that a commercial display (of the size proposed in relation to the host building) is appropriate in the context of the vibrant and historically commercial character of the conservation area. The advertisement will have no physical impact on the host building, any impact will be purely visual and temporary, accordingly, it will not impact materially on the significance of any heritage asset. The positive benefits to the host building, on the other hand, will be long lasting.

The Applicant trades as Maximus and has a proven record of assisting landowners in improving their assets by subsidising refurbishment and redevelopment projects. Please see the brochure 'Enhancing the Urban Landscape' which is submitted as part of this application and showcases some examples of how Maximus's commercially sponsored illustrated shrouds have delivered real benefits to the public realm. This positive impact on visual amenity is long lasting and should be considered in addition to temporary benefits of screening unsightly scaffolding and building works.

Fig. 1: Example of negative visual impact of unsightly building works at Portland Street, London



Fig. 2: Example of negative visual impact of generic sheeting - 2016



The proposed advertisement-bearing shroud will screen scaffolding with a smart, well-maintained shroud, significantly mitigating the negative impact of building works, as per the example provided below which we include for the sake of comparison in order to demonstrate the potential benefits of granting consent.

Fig. 3: Example of the aesthetic benefit potentially afforded by a scaffold shroud, Covent Garden



Highway Safety

In terms of highway safety, Section 7 of the Planning Practice Guidance accompanying the NPPF concerns considerations affecting public safety. Section 18b-067 states that 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”*. The proposed advertisement fully meets these criteria being a normal poster panel in a commercial area and not protruding into the skyline.

Section 18b-068 of the Practice Guidance sets out a list of the kind of adverts that *“may cause a danger to road users”*, none of which apply to the proposed advertisement, which will not do any of the following:

- Obstruct or impair sight-lines
- Obstruct or confuse a road user’s view
- Reduce the clarity or effectiveness of any traffic sign



- Be likely to distract road users because of their unusual nature (a banner advertisement is not in and of itself an unusual feature)
- Leave insufficient clearance above any part of the highway
- Include moving or apparently moving elements
- Require close study
- Resemble traffic signs
- Embody directional or other traffic elements

The proposed advertisement is not unusual, is it static with good range of visibility, and thus it will not appear as a sudden feature or present a hazard. This type of advertisement display is designed to be readily assimilated and understood by road users and pedestrians. The size, type, position and illumination are all appropriate in the context of the commercial area. In light of the above the proposal is not considered a threat to road or public safety.

Conclusion and Summary

We acknowledge that the proposed shroud advertisement may exert a degree of temporary visual impact on the street scene. However, the commercial display will subsidise the erection of a smartly maintained, high-quality scaffold shroud that will be visually more appealing than the alternative generic scaffolding, grey plastic sheeting and building works that would otherwise negatively impact upon the visual amenity of the area. Although the site is located in a Conservation Area, the character of the area is busy and commercial where adverts are common and expected features. We submit that the impact of the adverts on visual amenity and the character of the Conservation Area should be considered net positive on balance. This principle of the amenity benefit afforded by illustrated advertisement bearing shrouds within conservation areas (with building imagery depicted) compared with generic scaffolding has been demonstrated comprehensively at appeal.

Furthermore, we submit that, in light of the current threat of an imminent recession posed by the Covid-19 crisis, it is more important than ever for Councils to support building owners and developers in utilising innovative means (such as advertising revenue) of leveraging private capital to continue investing in and regenerating the built environment.

Commercial sponsorship projects of this nature create an entire eco-system of economic benefit with significant knock-on effects stimulating many areas of the economy, particularly the construction and retail sectors, but also benefiting the creative industries and a range of related professionals. The chain of advertising agencies, creatives and personnel involved in the successful delivery of such an advertisement are all considered to fall within 'the creative industry'.

In addition, we would suggest that commercial adverts in the public realm are rateable assets and as such provide an opportunity to contribute to local government through the collection of business rates.

We believe that the proposed shroud advertisement is policy compliant, is of a modest size that is proportional to the building façade. The display is framed by an illustrated shroud with a 1:1 depiction of the building imagery. The display is proposed for a temporary period and meet all of the criteria for highway safety set out in Section 18b-068 of the Practice Guidance.

I am attaching the following documents with this letter to assist determination:

- Location Plan
- Site Plan



- Existing Northeast Elevation
- Existing Southeast elevation
- Proposed Northeast Elevation
- Proposed Southeast Elevation
- Standard Specifications
- Existing View
- Proposed View
- Specification of Works
- Minor Works Building Contract
- Contract Document A
- Contract Document B
- Contract Document C
- Contract Drawings
- Cross Section
- Programme of Works
- 'Enhancing the Urban Landscape' Maximus Brochure
- Lighting Specifications

We trust the planning department has sufficient information to determine this application for advertisement consent and we look forward to a decision in due course.

Prepared by

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