AdFolio

11 March 2025

Planning, Growth and Development
PO Box 532
Manchester
M60 2LA

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

Royal Buildings, 2 Mosley Street, Manchester, M2 3AN

Dear Sir/Madam,

Please find enclosed an application for advertisement consent for a printed protective scaffolding shroud with inset commercial advertising space for a temporary period during works at the Royal Buildings on the northwest corner of Piccadilly Gardens.

An opportunity is presented to provide a better solution for screening the works via a printed vinyl scaffold shroud displaying a 1:1 image of the refurbished buildings, with an area reserved for advertising.

The advertisement application is submitted by Adfolio acting as agents on behalf of the applicant (Streetvox) who are partnering with the landlord, Criterion Capital Ltd.

An identical proposal was approved at the site in 2009 when the building was last scaffolded in relation to external refurbishment works by the previous owner, Legal and General (LPA Ref: 091533/AOH/2009/C1). This time the proposal relates to scaffolding required in association with the change of use of the building from an office to a hotel (LPA Ref: 137450/FO/2023).

Site and Surroundings

The proposal site consists of the front façade of 2 Moseley Street, which fronts onto Picadilly Gardens (Figure 1). The building is on the corner Moseley Street and Market Street and is wrapped around to the rear by a Primark Department Store. The area around is closed to general vehicular traffic but has tram routes leading to Piccadilly Gardens Station. There is a high footfall of shoppers and commuters in the area.

t: +44 (0) 7872 590 069
w: www.adfolio.co.uk
e: info@adfolio.co.uk
a: Studio 20, Meantime Studios, 14 Feathers Place, London, SE10 9NE

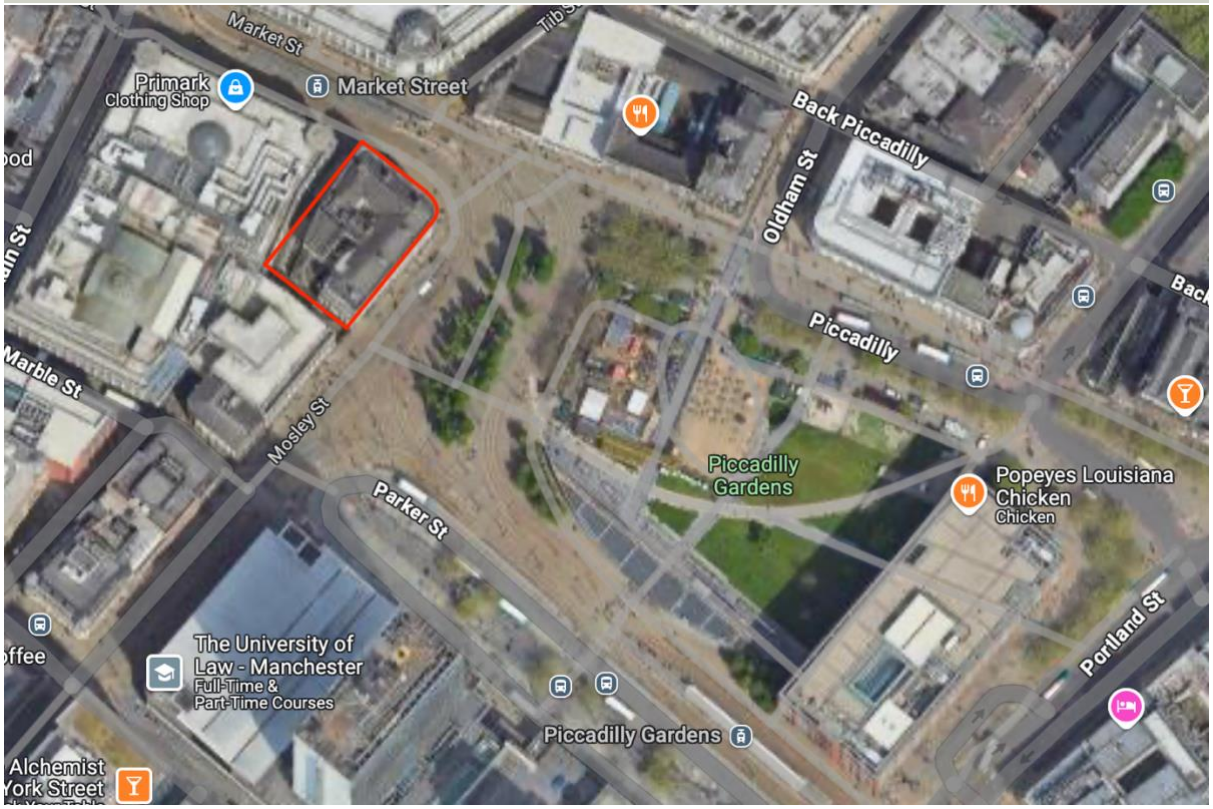


Figure 1 – Site Location

The area is mixed-use, predominately comprising ground floor retail uses with residential and office upper floors. The Site is within the Primary Shopping Area and is a gateway to the Primary Shopping Area which provide a wide variety of high-street brands and independent retailers.

The Arndale shopping centre is to the west of the site, which forms the heart of the Primary Shopping Area. Piccadilly Gardens is located immediately to the east and is a recognisable pedestrian and public transport hub, comprising the largest open space in the City Centre, surrounded by cafes, restaurants, leisure and retail. Piccadilly Gardens provides routes to other city centre areas.

The existing building (Figure 2) comprises five storeys, plus a basement level. The ground floor is made up of retail and commercial units, some of which are currently vacant. The first to fourth floors have previously been used as for office and education use, though they are now vacant.

In accordance with the policies map, the site is within the designated City Centre Primary Shopping Area. It is not within a Conservation Area, but is adjacent to the Smithfield Conservation Area to the north; the Stevenson Square Conservation Area to the east; and the Upper King Street Conservation Area to the east. The building is not listed but there are Grade II listed buildings and monuments on and around Piccadilly Gardens, including the following which are within the immediate surroundings of the proposal site:

- Rylands Building (Debenhams) (see Figure 2)
- Electricity Junction Box, Tib Street

- 1 Piccadilly
- 15 and 17 Piccadilly
- Peel Statue



Figure 2 – Royal Buildings (left) and scaffolded Rylands Building (right)

Site Planning History

An application to change the use of the building to a Hotel was approved in 2023 and is due to be implemented shortly. This is the application of primary relevance to the proposal and is summarised below.

- 137450/FO/2023 - Change of use of upper floors from offices (Use Class E) to hotel (Use Class C1), including infilling of lightwells, with boundary treatment to Meal Street – Approved 14th December 2023

As noted in the intro, it is also highly relevant that a proposal for the same form of development has been approved in the past at the site.

- 091533/AOH/2009/C1 – Display of advertisement banner on scaffold mesh for a temporary period of 6 months – Approved 16th December 2009

Furthermore, it is of relevance that approval was granted for an externally illuminated scaffold mounted banner at Rylands House (Grade II) in 2022:

- 132893/AOH/2022 - Erection of 2 no. illuminated scaffold mounted banner advertisements for a temporary period of 6 months

This area of this banner is illustrated in the Streetview image taken from July 2024, which appears to have been taken after the advert consent had expired and the advertisement banner had been removed.

- 138826/AO/2023 - 77 Mosley Street Manchester M2 3HR - Installation of temporary trough illuminated scaffold mounted advertising banner – Approved February 2024

This site was Grade II Listed and within the George Street Conservation Area. The less than substantial harm identified to the listed building and Conservation Area was considered justifiable due to the temporary nature of the works and the funding that this would generate to improve the condition of the building.

Application Proposal

The proposal seeks advertisement consent for a printed PVC mesh scaffold shroud that will extend the full length of the scaffolding, which will in turn cover the full frontage of the building. The printed shroud will display a 1:1 image of the refurbished building to present a more attractive screening during necessary works. A space is allocated for commercial advertising at corner. When unsold this will be replaced with the 1:1 image.

The scaffold wrap will act as both a safety shroud and screen to the scaffolding erected as part of the renovation works. The refurbishment works and associated scaffolding are consistent with the planning approvals at the site.

The total area of the wrap is 1,360sqm and the inset area of commercial advertising is 300sqm, representing 22% of the total area.

A maximum period of eight months is sought, which is expected to cover the duration of the scaffolding works, taking into account the time it would take to secure the advertisement consent.

The building works can be summarised as follows:

- Extension of building to rear
- Infill of the lightwells
- Re-roofing parts the building
- Investigate windows and facade
- Remediate all of the windows across the facade
- Scaffolding also for M&E installation

This will proceed in accordance with the enclosed schedule, with the key point to note being the scaffolding erection completed in April 2025 and its dismounting in June 2026. The scaffolding is subject to a separate license and will be removed along with the adverts as soon as the works are completed and prior to the end of the agreed period.

Fully trained and experienced installers will carry out the work.

The inset advertisement will be externally illuminated but will be switched off at night (11pm). The levels of illumination will be controlled to be well within the ILP guideline limits. Details of the lighting are included in the submission.

Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the "Regulations"). Regulation 3 states that advertising should be controlled in the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The National Planning Policy Framework 2024 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 141 of the NPPF advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts. As described in the National Planning Practice Guidance (NPPG) the regime in a "lighter touch" than the system for obtaining planning permission for development.

The NPPG acknowledges that wrap advertisements may be acceptable to accompany refurbishment projects:

> *"Buildings which are being renovated or are 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"*

The Development Plan for Manchester consists of the Places for everyone Joint Development Plan Document (2024); Core Strategy (2012-2027) and addendum to Core Strategy (2024); saved Policies of the Unitary Development Plan (2007) and the accompanying Policies Maps.

Sections 16, 66 and 72 of the Listed Buildings and Conservation Areas Act 1990 requires that special consideration is given to the preservation of the significant fabric and setting of listed buildings and conservation areas.

The following development plan policies are considered relevant to the assessment of amenity, public safety and heritage impact:

- **Core Strategy Policy DM1** (Development Management) - states that all development should have regard to the impact on the character of the surrounding area in terms of design, scale and appearance and effects on built heritage.
- **Core Strategy Policy SP1** (Spatial Principles) - states that development in all parts of the City should make a positive contribution to neighbourhood, creating well designed places that enhance or create character, consider the needs of all member of the community and protect and enhance the built environment.
- **Core Strategy Policy CC9** (Design and Heritage) States that development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including conservation areas and listed buildings.

- **UDP Policies DC15.1 and 15.2** (Advertisements, Hoardings and Posters) state that the City Council will take into account the impact of advertisements on visual amenity and public safety when determining applications for the display of advertisements, including free standing advertisement hoardings.
- **UDP Policy DC18.1** (Conservation Areas) - seeks to preserve and enhance the character of its designated conservation areas.
- **UDP Policy DC19.1** (Listed Buildings) - which seeks to preserve and enhance the settings of listed buildings by appropriate control over new developments within their vicinity.

There is no set policy in relation to scaffolding shrouds and as described above, similar adverts to this have been granted consent previously.

Other Material Considerations

It is a central principle of planning that each application is determined on its own merits. However, there is also a principle of consistency that means that previous decisions are capable of being material considerations. This has been supported in The High Court, most notably by Mann LJ in North Wiltshire District Council v Secretary of State for the Environment (1993). With this in mind, there are other decisions by the Local Authority and Planning Inspectorate that are worthy of consideration. As set out earlier, permission has been granted on the site previously under the same set of Advertisement Regulations (2007) and more recently consent has been granted for similar proposals on nearby buildings in more sensitive locations.

Utilising high quality scaffold sheeting and 1:1 printed images of buildings is accepted as a positive public benefit by Planning Inspectorate in the majority of cases.

Planning Considerations

As established in the NPPG and demonstrated elsewhere in Manchester, the principle of the proposal is acceptable, with the primary consideration whether the location is appropriate and the size and positioning of the display has an acceptable impact on the streetscene. As such the focus is on the impact on visual amenity.

Visual Amenity

The meaning of amenity can be wide ranging but in the context of assessing advertising it is usually defined as being the impact on visual amenity in the immediate neighbourhood. The proposal site is in a prominent location within the primary retail area in Manchester and is not listed or within a Conservation Area. The site consists of commercial building where most of the surrounding uses are commercial in nature. The completed refurbished building will be for commercial use, with retail at ground floor and a Hotel above. The building will therefore support signage and advertising in the longer term.

Taken as a whole, the proposal would be a visual improvement to the alternative of standard scaffolding. The mesh vinyl wrap will tidy up the façade and the 1:1 printed image will enable the building to be read within the townscape for the duration of the works. The advertising would form a small element (approx. 22%) and would be clearly recognisable as a temporary element related to the works. Furthermore, the

advertising would face onto the square and support the retail function of the area, as well as supporting the viability of the refurbishment works, which will be to the long term benefit of the area both in terms of visual amenity and local economic investment.

The predominant view of the advert would be from the northern part of the enclosed square. The advert will not be visible in long views and will offer a location specific branding opportunity.

The size, positioning and height of the advertising has been informed by proposals considered acceptable by Manchester elsewhere.

Heritage Impact

The proposal site is not listed nor is it within a Conservation Area. However, the visibility of the display from neighbouring Conservation Areas and Listed Buildings demands consideration of the heritage impact.

In accordance with the NPPF applicants are required to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As noted earlier, the following Heritage Assets have been identified as being potentially affected by the proposal due to their proximity.

- Rylands Building (Debenhams) – Grade II Listed building on the opposite side of Market Street. The asset is appreciated in the same views as the proposal site as illustrated in Figure 2. Impacts on this view must be considered in the context of the building being scaffolded with a standard sheeting which can often look untidy and cause greater visual harm (see application drawings). The 1:1 printed image will allow a continued appreciation of the setting and will mitigate the harm of the scaffolding for the temporary period. As such any harm that can be attributed would be at the lowest end of "less than substantial" and would be outweighed by the public benefit of the 1:1 printed display.
- Electricity Junction Box, Tib Street – Grade II Listed junction box in close proximity to the site. This asset is appreciated at close quarters and as such the wider setting is not considered to be significant to its heritage value and the proposal will have no impact on its overall significance.
- 1 Piccadilly – Grade II Listed building on the opposite side of Market Street. Similarly to the Rylands Building, the is appreciated in the same views as the proposal site, although perhaps less prominently. Impacts on these views should be considered in the context of the building being scaffolded with a standard sheeting which can often look untidy and cause greater visual harm. The 1:1 printed image will allow a continued appreciation of the setting and will mitigate the harm of the scaffolding for the temporary period. As such any harm that can be attributed would be at the lowest end of "less than substantial" and would be outweighed by the public benefit of the 1:1 printed display.
- 15 and 17 Piccadilly – Grade II Listed Buildings at the corner of Oldham Street. This asset is further from the site than 1 Piccadilly and is unlikely to be

appreciated in the same views as the proposal site, particularly given the tree screen between the sites. No harm could therefore be attributed to the setting of this building or its significance as a result of the proposal.

- Peel Statue – Grade II Listed statue to the front of the building. Piccadilly Gardens is a significant part of the setting of this asset and the proposal will be visible from most parts of the square. However, the harm that can be attributed would be at the lowest end of "less than substantial" and would be outweighed by the public benefit of the 1:1 printed display.
- Smithfield Conservation Area – Located to the north and includes the Rylands Building, 1 Piccadilly and 15 and 17 Piccadilly. This part of the Conservation Area is commercial and Piccadilly Gardens is part of its setting, although not part of a Conservation Area itself. The proposals would be temporary and support the longer term aim of improving the building and enhancing Piccadilly Gardens which will in turn enhance the setting of the Conservation Area. Any harm would be temporary and outweighed by the public benefit of the 1:1 printed display.
- Stevenson Square Conservation Area – Located further to the south east, the site is considered to be sufficiently separated for the proposal to have negligible impact on the setting of the Conservation Area and less so than the Smithfield Conservation Area.
- Upper King Street Conservation Area - Located to the west, the site is considered to be sufficiently separated for the proposal to have negligible impact on the setting of the Conservation Area and less so than the Stevenson Square Conservation Area.

In summary, any harm that could be attributed to the proposal would be at the lowest end of "less than substantial" and would be mitigated by being temporary and by the positive benefit of tidying up the scaffolding and introducing the 1:1 printed image. The harm is therefore justified and on a temporary basis the proposed advertisement and its impact on visual amenity and heritage assets is considered to be acceptable and is in accordance with the Advertisement Regulations, the NPPF, NPPG, and the Development Plan.

Public Safety

The NPPF also requires the consideration of the impact on highways safety. It is generally accepted that a static advert in a commercial location of this type, with slow moving traffic and plenty of other visual stimulus, would be acceptable in highways safety terms. The proposed illumination of the advertisement will be from above and below, projecting back onto the signage rather than outwards where it might cause glare. It would be kept at a low level in accordance with ILP guidance to ensure that it is not dazzling or distracting and that the means of illumination is not visible. A proposal on the opposite side of Market Street has previously been considered acceptable and there are no incidents resulting from this that have been made known to the applicant.

Summary and Conclusion

The proposals have been advanced in partnership with the landlord and are coordinated with the current works and consistent with the approved plans to convert the upper floors to a Hotel Use. The proposed scaffold shroud with inset advertising will

improve the development site for the period of scaffolding works, which is expected to be until June 2026. A period of 8 months consent is sought which will start at the earliest opportunity following the grant of consent and the erection of scaffolding.

Application Submission

In order to complete the application, please find attached the following documentation:

- Completed application forms;
- Planning Statement (This Letter)
- Architectural drawings including;
    - Site Location Plan
    - Site Plan Existing
    - Site Plan Proposed
    - South Elevation Existing
    - South Elevation Proposed
    - North Elevation Existing
    - North Elevation Proposed
    - Flattened Full Elevation Existing
    - Flattened Full Elevation during works
    - Flattened Full Elevation Proposed

Additionally, we will arrange payment to Manchester City Council to cover the cost of the Advertisement Consent application.

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,



Ben Kelly
Planning Consultant
DD: 07872590069
Email: ben@adfolio.co.uk