Armstrong Planning

PLANNING STATEMENT

on behalf of

King Media Ltd

for

Advertisement Consent for Temporary Display of an Externally Illuminated Shroud Advertisement – (PP Ref: 13474618)

at

102-104 Market Street & 2-4 Fountain Street, Manchester, M1 1PB

10th October 2024

Armstrong Planning Ltd
Fenland House, 15B Hostmoor Avenue, March, Cambridgeshire, PE15 0AX | info@armstrongplanning.co.uk | 02032398901

1. INTRODUCTION AND CONTEXT

1.1 Introduction

Armstrong Planning have 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 (23.2m wide x 6.2m high) at 102-104 Market Street & 2-4 Fountain Street, Manchester, M1 1PB (the application site) for a temporary period of 33 weeks (from 10/12/2024 to 31/07/2025).

1.2 The Application Site and Allocations

The application site is located at 102-104 Market Street & 2-4 Fountain Street, Manchester, M1 1PB and is identified as falling within the jurisdiction of Manchester City Council. The property, a four-storey building, is located at the junction of Market Street and Fountain Street. The surrounding area is busy, vibrant and is commercial in character. The host building is not a Listed Building. It is, however, identified as falling within the Upper King Street Conservation Area. The site is located within the City Centre and is identified as falling within a Primary Shopping Area. It does not fall within an area of Special Advertisement Control.

2. THE PROPOSAL

Maintenance, repair and wind & water-tightening works are scheduled to take place at the application site (refer to the Signed Contract of Works accompanying this application). This application is seeking advertisement consent for a static, externally illuminated shroud-advertisement measuring 23.2m wide x 6.2m high, 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 building works. The advertisement, shroud and scaffolding will be removed upon completion of the works, after a period of 33 weeks. This illustrated shroud will consist of a high-quality material and will be maintained to a high standard. It will help mitigate the negative impact of the necessary scaffolding and building works on the visual amenity of the area. The commercial area within the shroud amounts to just 19.2% of the scaffolded elevation, ensuring the building will be read first and foremost, with the advertisement being a secondary and subordinate feature.

3. POLICY COMPLIANCE

NPPF

The National Planning Policy Framework (NPPF), revised December 2023, 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 141 of the revised NPPF states that "*advertisements should be subject to control only in the interests of amenity and public safety*."

Planning Practice Guidance

It is important to note that Section 18b-001- 20140306 of the Planning Practice Guidance (PPG) accompanying the NPPF states that the "*display of advertisements is subject to a separate consent process within the planning system... Advertisements are controlled with reference to their effect on amenity or public safety only, so the regime is a lighter touch than the system for obtaining planning permission for development*."

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*."

Local Plan

Manchester's Core Strategy was adopted in July 2012 and replaces much of the Unitary Development Plan (UDP) however some UD policies remain extant.

The Citywide Development Control Policies of the extant UDP set out detailed development control policies for Manchester City. Section 15 relates to 'Advertisements, Hoarding and Posters' and states that "*the Council accept that advertisements can have a positive rote in improving the quality of the visual environment in the 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 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."

Visual Amenity

In terms of visual amenity, the shroud will shield public view from the negative visual impact of building works and scaffolding while works are taking place, helping mitigate the negative impact of the necessary scaffolding and building works on the visual amenity of the Conservation Area. 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 advert appearing as a secondary and subordinate feature. The effect of which is that the sense of the building in its streetscape will be retained. The advertisement proposed within the shroud takes up just 19.2% of the scaffolded elevation, which makes it a modest size and, therefore, acceptable for consideration.

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 commercial character of the area. The proposed advertisement will only be in situ during the phase of works and will be removed thereafter. There will be no physical impact on the host building, any impact will be purely visual and temporary, it will not impact materially on the significance of any heritage asset. The positive benefits to the host building of the planned refurbishment work, will be long-lasting.

The commercial display relies upon the advertisement being sold, typically accounting for only 50% of the permitted display period. When the space is unsold, the full 1:1 building imagery will be visible. As a result, the visual impact is likely to be significantly diminished.

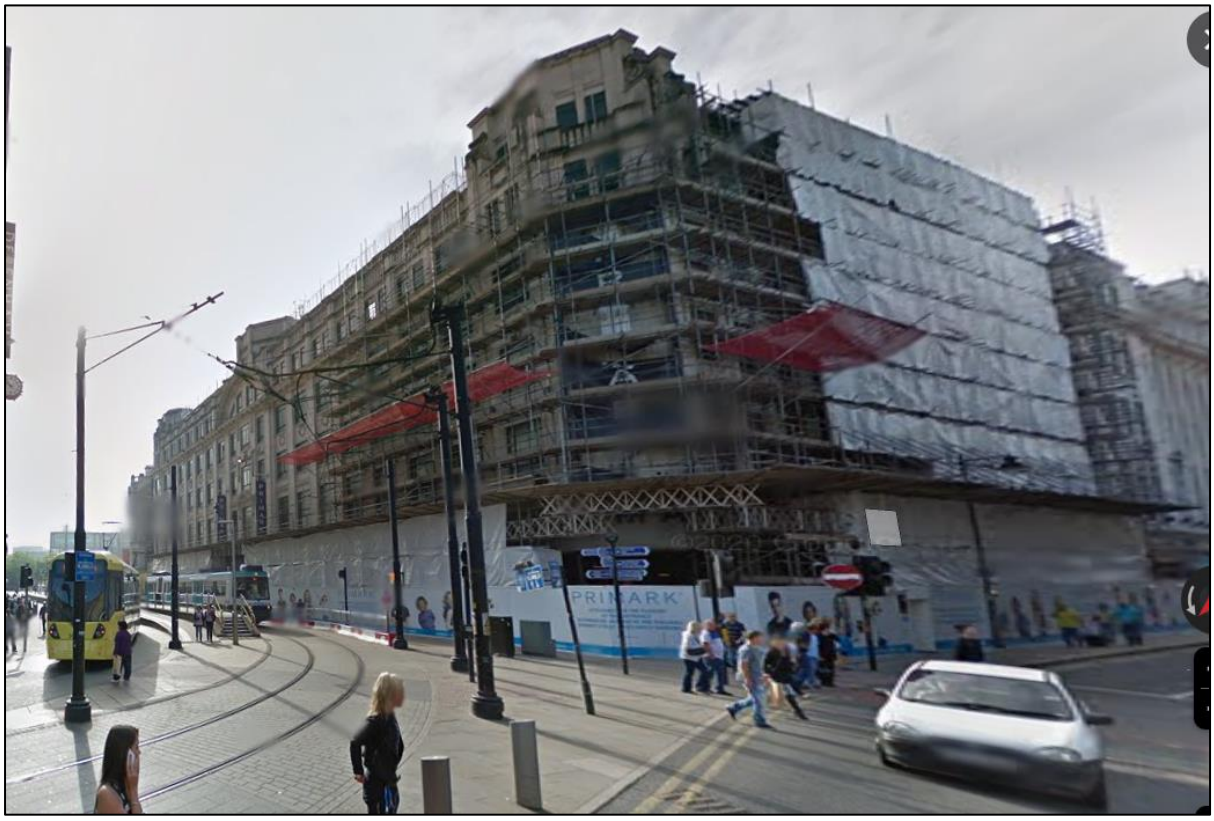
The proposal seeks to attract a commercial advertiser during the phase of works only and will improve the visual appearance of the building while scaffolding is necessary. The images below show negative visual impact of scaffolding at locations in close proximity to the application site.

Fig 1: Example of negative visual impact of scaffolding on the street scene at Addington Street

Fig 2: Example of negative visual impact of scaffolding on the street scene

Fig 3: Example of negative visual impact of scaffolding on the street scene

Fig 4: Example of negative visual impact of scaffolding on the street scene



The building owner has partnered with applicant, King Media Ltd (trading as Maximus), who have a proven record in assisting landowners in upgrading their properties 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. The images below are examples of smartly screened building sites at London.

Fig 5: Example of the aesthetic benefit afforded by a shroud at Wellington House, Piccadilly, Manchester

Fig 6: Example of the aesthetic benefit afforded by a scaffold shroud.

Fig 7: Example of the aesthetic benefit afforded by a scaffold shroud.

4. PUBLIC 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, it is static with good range of visibility, thus it will not appear as a sudden feature or present itself as a road hazard. This type of advertisement display is designed to be readily assimilated and understood by road users and pedestrians. The size, type and position 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.

5. PRECEDENTS

- Planning Ref – 139391/AOH/2024: Permission was granted for temporary display of an externally illuminated shroud advertisement (10.8m wide x 7.6m high) at 68-70 High Street, Manchester. The site was identified as falling within Smithfield Conservation Area 1987. The advertisement was acceptable considering that the harm was justified by temporary nature of the works and that the funding the advertisement would generate was intended to improve the condition and future structural integrity of the building within a conservation area.

- Planning Ref – 135172/A0H/2022: Planning permission was granted for temporary display of an externally illuminated shroud advertisement at Wellington House, 39 Piccadilly, Manchester, M1 1LQ. This permission saw consent granted for a banner 26.6m wide x 10.6m high.

- Planning Ref – 133655/AOH/2022: Permission was granted at 36 Charlotte Street, Manchester for temporary display of advertisement for a period of 12 months. This permission saw consent granted for a banner 28.9m wide x 10.3m high.

- Planning Ref – 137296/AOH/2023: Permission was granted for temporary display of two illuminated scaffold mounted banner advertisement at 109-127 Market Street, Manchester. In the Officer's Report, any visual impact caused by the advertisement was justified by the funds it would generate for the building's refurbishment. This impact was considered acceptable because it would be temporary and tied to legitimate work on the building.

6. CONCLUSION AND SUMMARY

We acknowledge that the proposed shroud advertisement may exert a temporary visual impact on the street scene. However, the commercial display 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 (as can be seen in the examples provided above). We submit that the impact of the advert on visual amenity should be considered net positive on balance. The screening benefits of this advertisement-bearing shroud (shielding unsightly building works) will mitigate the impact on visual amenity that temporary building works will incur.

We submit that the proposed shroud advertisement is of a modest size, that is proportional to the building façade. The advertisement is framed by an illustrated shroud with a 1:1 depiction of the building imagery. A temporary shroud advertisement of this sort should be considered acceptable in a busy commercial area. The temporary nature of the shroud only being required until the works are completed needs to be taken fully into account.

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 collection of business rates.

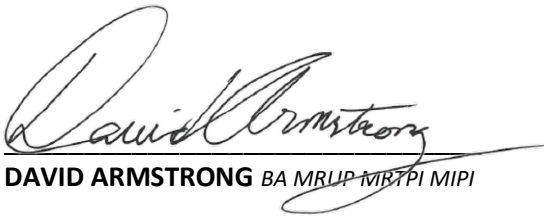
We are attaching the following documents with this letter to assist determination:

- Location Plan
- Site Plan
- Existing East Elevation
- Existing North Elevation
- Existing View
- Proposed East Elevation
- Proposed North Elevation
- Proposed View
- Standard Specification
- Project Programme
- Schedule of Works

- Schedule of Condition
- Signed Contract of Works
- Lighting Specification
- 'Enhancing the Urban Landscape' Maximus Brochure

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



DAVID ARMSTRONG *BA MRUP MRTPI MIPI*