AdFolio

30 June 2026

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

Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990

Proposed Digital Advertisement Displays at Victoria Metro Station Platforms A/B and C/D - Design and Access Statement

Dear Sir/Madam,

Please find enclosed an application for Listed Building consent relating to the installation of 2no. freestanding double sided digital displays on the platform at Victoria Metro station platform, located within Victoria Station (Grade II).

The proposed displays will be capable of carrying a rotation of adverts and public information provided remotely from a central location via a content management system.

Following pre-application discussions with Manchester City Council, it was determined that the proposal fell outside of the control of the Advertisement Regulations by virtue of being located within an enclosed part of the station where it would not be visible from public areas in the surroundings (Schedule 1 Class A). Nevertheless, by virtue of also being within the curtilage of the Grade II Listed Victoria Station Building, Listed Building Consent is required in order to assess the impact on the significance of the heritage asset.

Although public safety does not form part of the assessment of this application, it should be noted that a safety assessment has taken place, with recommendations made to limit the potential for distraction to Metro drivers entering the platform. This is provided for information.

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The Applicant

The applicant, Transport for Greater Manchester (TfGM), is the local government body responsible for delivering Greater Manchester's transport strategy and commitments.

TfGM implements the decisions made by the Greater Manchester Combined Authority (GMCA) headed up by the Mayor and the Greater Manchester Transport Committee (GMTC), to improve transport services and facilities for Greater Manchester. This area includes bus stations and stops, and the Manchester Metrolink, and covers Bolton, Bury, Oldham, Rochdale, Stockport, Tameside, Trafford, Wigan, Manchester and Salford.

TfGM is funded through a mix of passenger fares, government grants, local authority funding, and commercial income. Fare revenue comes mainly from Bee Network buses, Metrolink trams, and integrated ticketing, but this does not fully cover the cost of running and improving the network.

To bridge the gap, TfGM also relies on:

- Central government and Greater Manchester Combined Authority funding; and
- Commercial and ancillary income such as advertising, retail concessions, property leasing, sponsorships, and car parking revenues.

These additional income streams help TfGM reduce pressure on public funding, support investment in transport infrastructure, and maintain services that may not be commercially profitable but are socially important.

Pre-Application

Given TfGM's responsibility towards safety, a number of proposed sites for digital displays were surveyed by Highways Safety experts at Waterman Group, with a Technical Note provided for internal review. Adfolio provided separate input on the planning constraints related to each location. Upon agreement of which sites to progress with, TfGM engaged with officers within the Planning Department at Manchester Council, with a meeting held on 17th November 2025. Following this meeting it was confirmed that sited Building Consent would be required for this proposal, but that it would fall outside of the scope of the advertisement regulations.

Site Description

The application site consists of the tram platform at Victoria Station in central Manchester. Specifically, the proposed advertisement diplays would be located at Platforms A B and C D, under the main station canopy (See red dots at Figure 1 for the approximate location of the displays).

Manchester Victoria station is one of Manchester's principal railway and Metrolink interchanges, located on the northern edge of Manchester city centre at Hunts Bank.

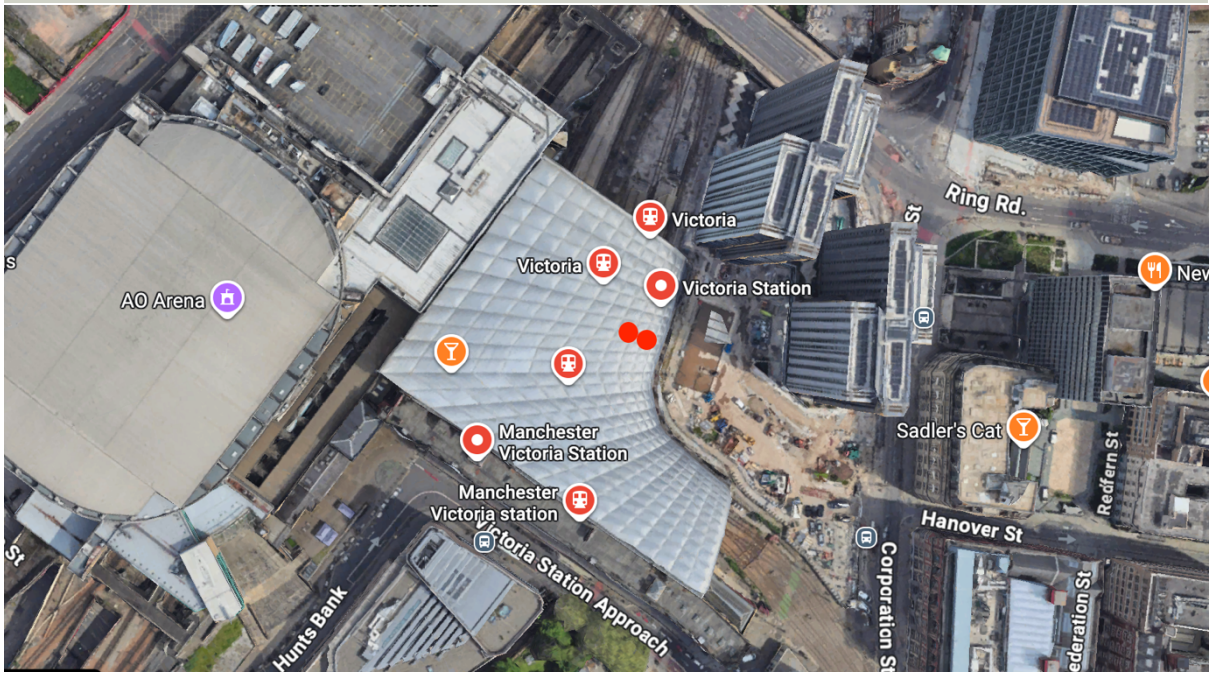


Figure 1 – Location in aerial view

The station directly adjoins the AO Arena and occupies a highly accessible and prominent location within the defined City Centre. It is walking distance of the city's retail core, including Manchester Arndale, the Northern Quarter and Printworks leisure destination. The surrounding area is characterised by a dense mix of commercial, retail, leisure, transport and civic uses, reflecting the site's role as a major gateway into Manchester city centre. Inside the station, there are many illuminated information boards and concessions with corporate branding. There are also digital screens displaying advertising located above the ticket barriers.

The Station is not within a Conservation Area although there are a number of listed buildings and structures in the immediate surroundings. The Station itself, including the concourse to the rear with restaurant and booking hall are Grade II listed (List Reference: 1254725).

Planning History

There is extensive planning history in relation to the station and the adjoining Arena. However, there is limited history in relation to the Metro Platform itself. The original permission to redevelop the station is of most relevance as this demonstrates the application site to be a non-original relatively recent part of the site:

- 100355/FO/2012/C1 & 100356/LO/2012/C1 - Redevelopment of railway station comprising demolition and replacement of the existing train shed roof and replacement with a new roof structure, provision of a new link bridge to the Arena, reconfiguration and refurbishment of the concourse, provision of new passenger facilities, refurbishment of heritage features including Heritage rooms, Soldier gate, memorial wall and ancillary works. The scheme also

includes the provision of additional Metrolink tracks and platforms within the station – Approved 13th January 2013

As described above and illustrated in Figure 2, this proposal included a reconfiguration of platforms to provide two Metrolink platforms, which now form the development site.

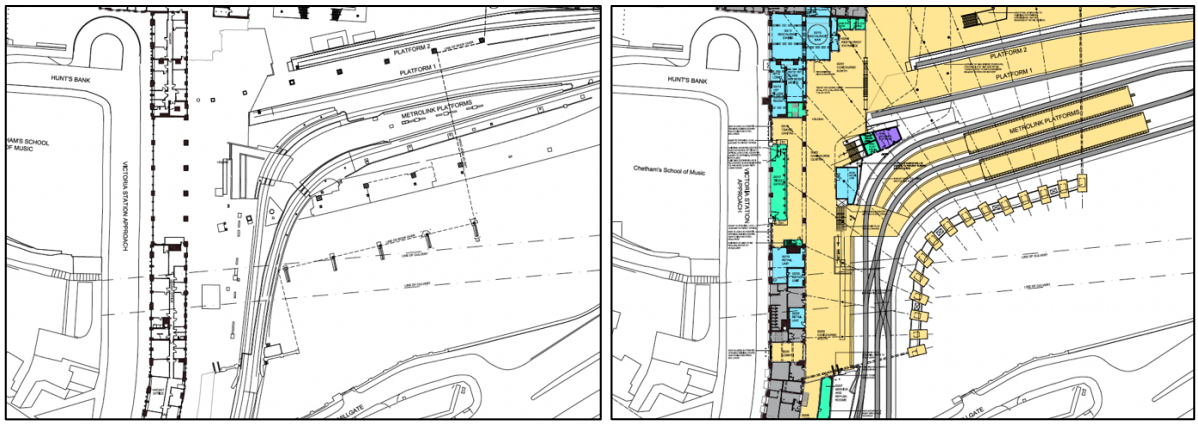


Figure 2 – Existing and proposed platform plans for application 100355/FO/2012/C1

The most closely related application to this proposal was for three digitally illuminated totem advertisements located elsewhere in the station:

- 136972/LO/2023 – Listed building consent for the installation of 3no. advertising screens in various locations within railway concourse – Refused and Appeal Dismissed (APP/B4215/Y/23/3329750)

The appeal decision identified harm by virtue of introducing visual clutter and distracting from important historic architectural features. It is important to note that the locations of the proposed displays were in more historic parts of the station, adjacent to stone walls, highly visible from the concourse and seen against the backdrop of the Edwardian Station building. The Inspector did not conclude that digital advertising is unacceptable at Victoria Generally, and in fact acknowledged the presence of three existing digital screens elsewhere in the station, 10 no. four-sheet poster boards and 4no. six-sheet poster boards. It was the specific locations within the main station that were considered to cause heritage harm.

It is also material to consider that freestanding digital advertising displays of similar scale to the proposal were approved outside the front entrance of the station in 2021 (Ref: 130397/AOH/2021).

Application Proposal

TfGM have identified an opportunity to upgrade the Metro network to digital screen technology in order to generate additional advertising revenue for reinvestment into transport services. As an associated benefit of this infrastructure, TfGM will have access to 16% of airtime to be used flexibly for their own campaigns and for non-essential

customer information (i.e. not real time transport information as this is already provided for). The displays will add to the digital infrastructure of the City and will be capable of flexible use for public messaging in the event of emergency.

The proposal seeks advertisement consent for 2no. freestanding double-sided digital displays on the platform at Victoria Station tram platforms A B and C D (see Figure 2). The advertisement displays are 1.105m x 1.905m and set within a black powder coated pressed steel unit measuring 1.345m (width) x 2.495m (height) x 0.3m (depth).

The proposed advertising units will be set into the existing platform, which is non-original and does not form part of the historic station. The foundations would be limited and would not extend beyond the existing modern platform.



Figure 2 – Existing view of Platform A B (left) and CGI (right)

The luminance levels on the digital LED displays will be controlled in accordance with the Institute of Lighting Professionals (ILP) Professional Lighting Guide 05/23: The brightness of illuminated advertisements including digital displays. For adverts under 5sqm in urban environments (i.e. Environmental Zone 4) this sets a maximum limit of 300cd/m2 during the nighttime (See Table 10.4). The ILP guidance recognises that screen brightness may be higher during the daytime to adjust to ambient light (see Table 10.5).

It is commonplace to restrict the operation of digital displays to control the level of illumination, display static images, and to limit the rate of change between adverts. Given the location on a station platform and targeted to a pedestrian audience where there is restricted vehicular access, in this instance it is proposed to allow for the consideration of some motion content for advertisements, whilst still preventing any extended video content, live feeds or flashing imagery. Accordingly, subject to further discussion with officers, the following conditions are proposed.

Suggested Conditions

To appropriately control the displays and minimise visual intrusion, the following conditions are proposed:

- the maximum luminance of the displays shall not exceed 300 cd/m² during hours of darkness;
- each advertisement shall be displayed for a minimum of ten seconds, with an instantaneous (no more than one second) transition between images, and no flashing content or live video streams;
- no advertisement shall include any element resembling a road traffic sign or traffic signal;
- the displays shall incorporate a light sensor to adjust luminance to ambient light conditions, and shall default to a black/blank screen in the event of malfunction;
- An anti-glare coating or film should be put over the screens.

Planning Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 is of primary importance in considering applications for Listed Building Consent and applications within Conservation Areas. The Council has a statutory requirement under Section 16(2) to have special regard to the desirability of preserving a Listed Building, or its setting, or any features of special architectural or historic interest. Section 66 of the Act requires that special consideration is given to the preservation of the significant fabric and setting of listed buildings and conservation areas.

Chapter 16 of the NPPF sets out how proposals affecting Heritage Assets should be assessed.

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.

Saved UDP Policy DC19 (Listed Buildings) is of primary importance. This states that the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of listed buildings and to protecting their general setting. In doing this the Council will not permit any external or internal alteration where there would be an adverse effect on its architectural or historic character; and will seek to preserve and enhance the settings of listed buildings by appropriate control over the design of new development in their vicinity.

The Places for Everyone Joint Development Plan Document (JDPD) places a strong focus on digital connectivity and on the provision of a clean, integrated and accessible transport system. Policy JP-C1 makes improving digital infrastructure a high priority; JP-C2 highlights the ambition to build on the success of Metrolink through measures to improve reliability, capacity and customer experience; and Policy JP-C5 supports the provision of new digital infrastructure to contribute to the quality of place. The JDPD sets an ambition for Manchester to be the UK's leading digital City.

Planning Considerations

The Advertisement Regulations require that applications for advertisements be considered only in the interests of amenity and public safety. An assessment of the proposals under these criteria is outlined below.

Heritage Impact

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when "*considering whether to grant listed building consent for any works the local planning authority… shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*".

Section 16 of the National Planning Policy Framework (the NPPF) sets out the framework for conserving and enhancing the historic environment in paragraphs 202 to 221.

Paragraph 207 of the NPPF states that applicants should describe the significance of any heritage asset affected including the contribution made by their setting. The level of detail should be proportionate and no more that is sufficient to understand the potential impact. As a minimum the historic record should be consulted and appropriate expertise used where appropriate. The summary on the Listed Building Register states the following:

> *"Railway station. Original block to Hunt's Bank Approach, 1844, for the Manchester and Leeds Railway Company (also used by the Liverpool and Manchester Railway Company), altered and greatly enlarged 1909 by William Dawes for the Lancashire and Yorkshire Railway Company; altered. Sandstone ashlar office blocks with slate roofs; cast-iron train sheds with slate and glazed roofs. Office blocks form L-plan, the original building on a north-east/south-west axis, and the much larger addition at right-angles to its north end. 1844 block in Italianate manner, now 2 storeys (originally one storey) and 7 bays wide, with square-headed doorways to left and right, arcaded windows to both floors of the centre, other windows with architraves and cornices. 1909 block in neo-Baroque style, 4 storeys and 31 bays plus rounded corner at south-east end; with channelled rustication to ground and 1st floors, pilasters to 2nd and 3rd floors, moulded cornice, and balustraded parapet interrupted by wide segmental open pediments over the 2nd, 6th, 19th and 29th bays, and upstands with clocks over the 4th bay and the curved corner. Round-headed windows and doorways to ground floor protected by delicate iron and glass canopy displaying names of one-time destinations in Art Nouveau lettering; windows to upper floors mostly square-headed and mullioned, but including oriels at 2nd and Venetian windows at 3rd floor of the pedimented bays. Fine surviving interiors to this part, including panelled booking hall, restaurant with*

stained glass dome and mosaic lettering, bookstall with mosaic decoration, map of Lancashire and Yorkshire railway system in tilework, etc."

The Grade II listed Victoria Station therefore derives its significance from its architecture and surviving features. The historic train shed, station buildings and ability to appreciate the architecture from the public spaces all contributes to the significance.

The proposal comprises the installation of two freestanding digital advertising units at the bottom ends of the Metro tram platforms A B and C D. The units would be located within the modern tram stop environment, away from the historic railway station buildings and the main concourse. The nearest listed structures are set well back behind the tram stop and the track alignment. They would therefore have no impact on the significance of the Heritage Asset and would also be temporary with any impacts reversable once they are removed. Any residual harm that could be attributed would be at the lowest end of "less than significant" and would be outweighed by the public benefits derived from revenue that would be reinvested into the public transport system. The National Planning Practice Guidance (NPPG) describes public benefits as "*anything that delivers economic, social or environmental progress*".

Noting that similar proposals elsewhere within the station were refused and dismissed at appeal in 2023, it is important to note that the proposed units are not positioned within the principal heritage spaces of Manchester Victoria Station, nor are they attached to, or read against the listed station building or its architectural features. They are located at the buffer-stop ends of the modern Metrolink platforms, within an environment characterised by contemporary transport infrastructure including shelters, lighting columns, ticket machines, CCTV equipment, railings and operational signage. This is a highly engineered transport environment rather than a heritage setting, as can be seen in the photograph at Figure 3. As can be seen in Figure 4, in the opposite direction the listed station is experienced primarily as the backdrop with many other features in between that are more dominant.

The Inspector's findings at appeal APP/B4215/Y/23/3329750 were specific to the locations proposed in that appeal and should not be taken as establishing a general objection to digital advertising at Victoria Station.

It is clear from any balanced assessment of the proposals, that there would be no heritage harm given the scale of development, the positioning of the units and the context of the surroundings.



Figure 3 – North facing view of site location illustrating lack of heritage context



Figure 4 – South facing view of site location illustrating separation from heritage context

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Summary and Conclusion

The proposal seeks consent for 2no. freestanding digital displays on the platform at Victoria Station tram stop. The proposed display units will carry a rotation of adverts and public information provided remotely from a central location.

Within the context of a busy mainline train station, the proposals would have a limited visual effect, in keeping with the established character of its surroundings.

The proposal presents an efficient means of advertising and delivering information to the public whilst generating revenue to the applicant for investment in public services. It will cause no harm to the significance of the Grade II listed station. It should therefore be supported.

Application Submission

To complete the application, please find attached the following documentation:

- Completed application forms;
- Planning Statement (This Letter)
- Architectural drawings including;
    - Location Plan
    - Existing Site Plan
    - Proposed Site Plan
    - Existing Plans and Elevations
    - Proposed Plans and Elevations
    - Advertising Technical Specification
    - Existing and Proposed CGI's
- Technical Note – Manchester Metrolink Site Survey Report

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,



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