AdFolio

30 June 2026

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

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

Exchange Square tram stop, Manchester, M4 3AJ

Dear Sir/Madam,

Please find enclosed an application for advertisement consent for two freestanding digital displays (1no. single sided and 1no. double sided) on the platform at Exchange Square tram stop, on Corporation Street. The proposed displays will be digital display units capable of carrying a rotation of adverts and public information provided remotely from a central location via a content management system. This proposal therefore provides efficiencies and reduces the need to travel, in addition to generating revenue to the applicant for investment in public services.

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.

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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.

Site Description

The application site consists of the tram platform at Exchange Square, on Corporation Street in central Manchester (Figure 1).

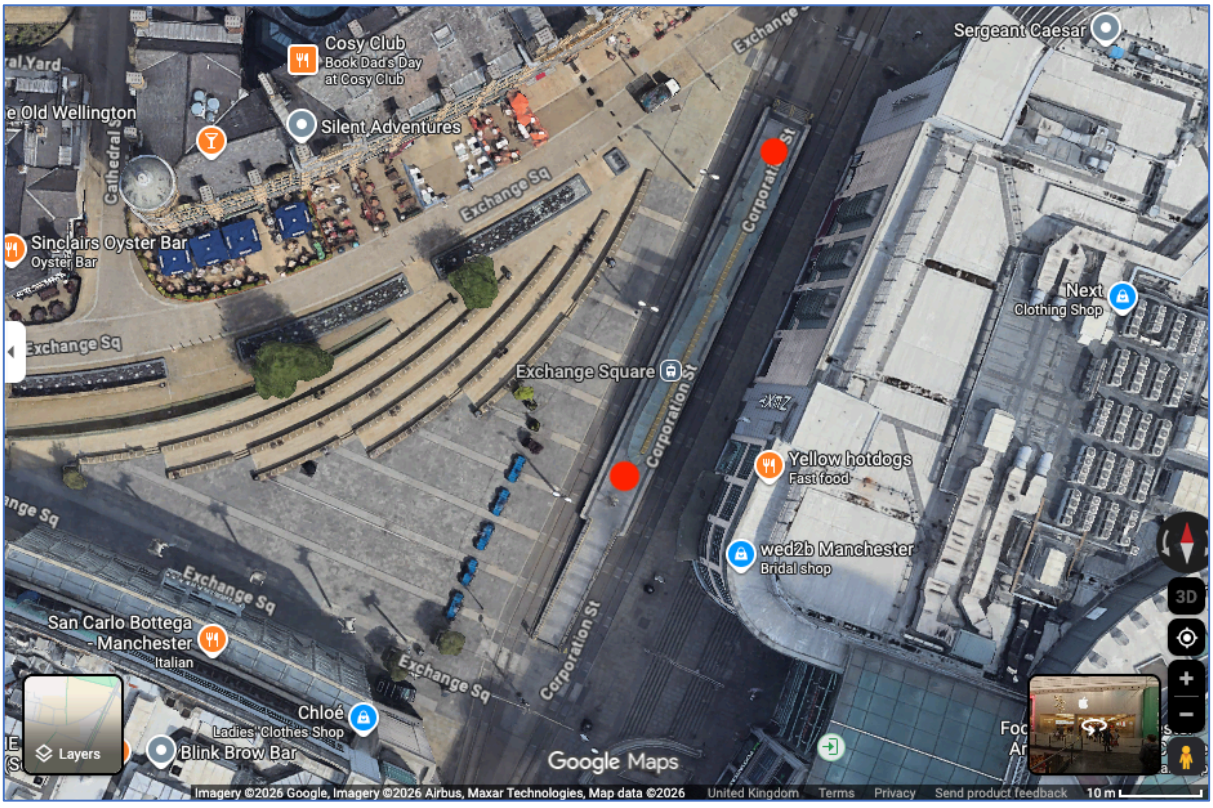


Figure 1 – Location in aerial view

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The site is within the City Centre Primary Shopping Area, a retail centre with active shopfronts and a high footfall of shoppers and commuters. There is substantial existing digital and illuminated advertising in the immediate vicinity, including the digital signage at the Printworks and a freestanding digital totem outside the Next store. The site is not within a conservation area.

The Grade II listed former Corn and Produce Exchange stands opposite the site, and a number of further listed buildings, including the Grade II listed Sinclair's Oyster Bar and The Old Wellington Inn, stand within the surrounding commercial townscape.

Planning History

There is no planning history in relation to the site itself. The most relevant planning history in the surrounding area is as follows:

- 128042/AOH/2020, advertisement consent for an 86-inch LED advertisement display screen on a public payphone unit at the pavement at Exchange Square / Corporation Street (M4 3AG), permitted November 2020.
- 139541/AO/2024, advertisement consent for advertisements on the Dantzic Street and Corporation Street elevations of the Printworks (Withy Grove, M4 2BS), permitted June 2024.

With respect to the comparably sized freestanding advert at the corner of Exchange Square and Corporation Street, officers concluded in the delegated report that *"Taking into account the design and siting of the proposals, any nearby designated heritage assets would not be considered to be affected adversely by the proposals"*.

At appeal, the Planning Inspectorate has allowed freestanding advertisement displays of similar scale within the surrounding City Centre context, including at 1 Deansgate (APP/B4215/Z/17/3190085) a short walk from the site. Here the Inspector found single-sided LED illuminated 6 sheet sequential display affixed to the frame of the payphone *kiosk "not to be unduly assertive, nor visually intrusive or incongruous, in the context of its surroundings"*.

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 two freestanding digital displays on the platform at Exchange Square tram stop (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).



Figure 2 – CGI's

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, targeted to a pedestrian audience where there is restricted vehicular access and the displays face away from the trams, in this instance it is proposed to allow for the consideration of some motion content for advertisements. However, it would still be proposed to restrict any extended video content, live feeds or flashing imagery. Accordingly, subject to further guidance from highways, the following conditions are proposed.

Suggested Conditions

In the interests of amenity and public safety, and to assist the Council, the applicant would be content for consent to be granted subject to the following conditions:

- 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.

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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 is a "lighter touch" than the system for obtaining planning permission for development.

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 Planning (Listed Buildings and Conservation Areas) Act 1990 require 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 members 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.
- Saved UDP Policies DC15.1 and DC15.2 (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.
- Saved UDP Policy DC19 (Listed Buildings), noted in respect of the Grade II listed Corn Exchange opposite, from which the site is sufficiently separated.

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.

Amenity

The proposal site is a tram platform within the City Centre Primary Shopping Area, a heavily commercial location where digital and illuminated advertising is an established and expected feature, including the large animated digital signage of the Printworks and a freestanding digital advertising totem outside the Next store.

The proposed freestanding displays are scaled to, and read as part of, the platform furniture, sitting between other items on the platform, and are oriented towards the open commercial frontages of the street. The highways report prepared by Watermans and submitted with this application assesses the space available and the potential for blocking sightlines, concluding that the location of the displays is acceptable.

In such an established commercial and digital context the displays would be neither unduly assertive nor incongruous, and would be seen as an expected element of a busy City Centre shopping street. This assessment is confirmed in decisions taken by the Council and the Appeal Inspectorate on similarly scaled proposals (see extract in planning history section).

Heritage Impact

The site is not within a conservation area. The Grade II listed former Corn and Produce Exchange stands opposite the site but is sufficiently separated from it, and is appreciated within a busy commercial setting in which advertising is already present; the proposal would not obscure, contrast with or dominate its principal frontage or any key view, and would preserve its setting. A number of other listed buildings, including the Grade II listed Sinclair's Oyster Bar and The Old Wellington Inn, lie within the surrounding commercial townscape and are likewise appreciated within that established, advertising-rich setting; by reason of its platform-level position, modest scale and freestanding form, the proposal would preserve their settings.

In summary, the impact on visual amenity and heritage assets is considered to be acceptable and is in accordance with the Advertisement Regulations, the NPPF, the NPPG, and the Development Plan.

Public Safety

The NPPF also requires the consideration of the impact on highways safety. TfGM have a statutory responsibility towards the safety of the highways network and would not progress proposals without first considering the risks. At the outset, Highways Safety experts at Waterman Infrastructure & Environment Ltd (Waterman) were instructed by TfGM to develop a set of criteria for the assessment of sites and to survey each site identified as having potential to support digital advertising, to review the likely impact on Metrolink Services. A Technical Report is provided with this application that considers ten sites, including the proposal site.

The displays are not located at, and do not face, a signalised road junction, and would not compete with traffic signals or directional signage. The onsite surveys and subsequent assessment have identified that there would be no adverse safety or operational impact from the installation of digital advertising boards at any of the locations identified.

There are currently digital advertising boards in Manchester City Centre within the vicinity of some of the stops that are operated by others (including by Manchester City Council), and these do not appear to have caused any adverse safety or operational issues. It is increasingly common for smaller format advertising to carry content with motion, as demonstrated by the renewal consent for a full motion digital totem in Piccadilly Gardens in 2023 (LPA Ref: 137215/AOH/2023). The proposed displays would not be visible to drivers of vehicles due to the restricted access, whilst trams would have slowed to a stop at the point the only facing display would become visible.

The Waterman report notes one slight collision in the most recent 3 year period within 50m of the sign. This occurred between a pedestrian and cyclist in wet conditions. Referencing the fact that there is another full motion display in view at the Printworks, Waterman determined that installation of the sign will not impact the collision level in the area.

Summary and Conclusion

The proposal seeks consent for two freestanding digital displays (1no. single sided 1no. double sided) on the platform at Exchange Square tram stop. The proposed display units will carry a rotation of adverts and public information provided remotely from a central location.

The proposal will not obstruct the highway or impede movement, and, within a Primary Shopping Area that already accommodates substantial digital and illuminated advertising, would have a limited visual effect, in keeping with the established

character of its surroundings, and would preserve the setting of the nearby listed Corn Exchange. It represents a modern piece of digital infrastructure that presents an efficient means of advertising and delivering information to the public whilst generating revenue to the applicant for investment in public services. 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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