AdFolio

30 June 2026

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

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

St Peter's Square tram stop, Manchester, M2 5PD

Dear Sir/Madam,

Please find enclosed an application for advertisement consent for two digital advertising diplays (1no. single sided 1no. double sided), replacing 3no. existing paper poster panels on the platform at St Peter's Square tram stop. The existing panels display advertising and customer information, replaced manually on a fortnightly basis. 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. 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

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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.

Site Description

The application site consists of the tram platform at St Peter's Square in central Manchester (Figure 1).



Figure 1 – Location in aerial view

St Peter's Square is a historic civic square and a principal Metrolink interchange, regularly used for public events, commercial activity and seasonal markets which themselves frequently incorporate temporary lighting and signage. The surrounding area is a mix of civic, commercial and leisure uses, and there is existing advertising in the vicinity, including signage to the south.

According to the Council's adopted Policies Map, the site lies within the City Centre and within the St Peter's Square Conservation Area, with the Albert Square Conservation Area adjacent to the south-west and the George Street Conservation Area nearby to the south. The station platform is not listed. A number of listed assets are present in the surrounding area: the Grade II listed Memorial Cross and a Grade II listed pair of K6 telephone kiosks stand in the immediate vicinity of the platform and are appreciated at close quarters, while the Grade II* listed Central Library, the Grade II* listed Manchester War Memorial (Cenotaph) and the Grade II* listed Town Hall Extension are the principal civic set-pieces of the wider square, appreciated in views read above platform level.

Site Planning History

There is no planning history in relation to the site itself. Other similar proposals have been granted consent in the locality including at the corner of Booth Street and Mosely Street approximately 100m north east of the site, where the installation of a freestanding double-sided advertising unit (BT Street Hub) was granted in August 2022 (LPA ref: 130424/AOH/2021). This site is within the adjacent "Upper King Street" Conservation Area and close to the Grade I Listed Manchester Art Gallery and Grade II Listed Waldorf House. As such it is considered to be comparable in terms of the city centre context with historic 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 digital advertising displays (1no. single sided and 1no. double sided), replacing existing paper poster panels (Figure 2), together on the platform at St Peter's Square tram stop. 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 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).



Figure 2 – Replacement Panel CGI

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. However, given the location on a station platform and targeted to a pedestrian audience where there is restricted vehicular access, it is proposed to allow for the consideration of some motion content for advertisements in this location. 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.

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 DC18 (Conservation Areas) seeks to preserve and enhance the character of designated conservation areas, and at DC18.1(a)(iv) makes the effect of signs and advertisements an express consideration.
- Saved UDP Policy DC19 (Listed Buildings) and Core Strategy Policy EN3 (Heritage) seek to preserve and enhance the setting of listed buildings through appropriate control over 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.

Amenity

The proposal site is a tram platform within St Peter's Square, a heavily-used civic and transport space in the heart of the City Centre. Whilst the square is of civic character, it accommodates regular commercial activity, events and seasonal markets, and there is existing advertising and platform infrastructure in the immediate setting. The two replacement panels occupy the position of existing advertising on the platform, and the single freestanding display will sit between other items of platform furniture. A directly comparable freestanding unit has already been approved close to the site, at Booth Street adjacent No. 74 Mosley Street: a 2.98m-high, freestanding, double-sided advertising unit (a BT Street Hub) permitted under 130423/FO/2021 and 130424/AOH/2021 following the removal of two telephone kiosks. The Council's acceptance there of a freestanding, double-sided advertising unit in the public realm, comparable in form, scale and function to the proposed display, establishes the principle and supports the acceptability of the present proposal.

The displays would be read at close quarters in the context of the platform and the surrounding commercial and event activity, and would not be unduly assertive or incongruous in that setting. The replacement of existing poster panels with digital counterparts was agreed as acceptable in principle at pre-application stage.

Heritage Impact

The NPPF requires applicants to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting, with the level of detail proportionate to the assets' importance. The site lies within the St Peter's Square Conservation Area, with the Albert Square and George Street Conservation Areas adjacent, and a number of listed assets are present in the wider setting.

The significance of the surrounding conservation areas derives principally from their planned civic and commercial townscape, the quality of their historic frontages, and the setting of their principal buildings, which are appreciated at first-floor level and above. The proposal sits at platform level within the established transport infrastructure of the square and in part is replacing existing advertising. The proposals will not obscure or dominate any historic fabric, frontage or key view, and is seen within a

setting that already accommodates the station platform and its bright yellow identifying features. The square itself regularly hosts events and is a key public space within the identified town center, meaning it often supports advertising and decoration. Whilst signage is more muted in this part of the City, there are commercial retail units adjacent to the site with large glass frontages and shop signage encouraging business.

In relation to the listed assets, the Grade II listed Memorial Cross and Grade II listed K6 telephone kiosks are appreciated principally at close quarters, and the proposal, set within the platform and its existing furniture, would not affect their significance. The Grade II* listed Central Library, Manchester War Memorial and Town Hall Extension are appreciated as major civic set-pieces in views that are read above platform level; given the platform-level position, the modest scale of the displays and the replacement of existing advertising, the proposal would preserve their settings. Particular care has been taken in respect of the Manchester War Memorial, and the proposed displays are positioned on the platforms so as not to intrude upon its setting or commemorative function.

It is therefore considered that the proposal, by reason of its platform-level position, modest scale, and the replacement of existing advertising within a square that already accommodates advertising, lighting and event signage, would preserve the character and appearance of the conservation areas and the settings of the listed assets, consistent with the statutory duties under sections 66 and 72 of the 1990 Act.

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 conclusions for the St Peter's Square site confirm that the digital displays should be permitted, noting the controlled platform environment and the absence of any collision history at the location. However, a preference was stated not to progress a freestanding sign facing tram drivers on the approach. This has therefore been removed from the proposal viewed at pre-application stage.

The remaining proposed displays are not located at, and do not face, a signalised road junction, and would not compete with traffic signals or directional signage, and

would be parallel to tram drivers forward views. 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. It is increasingly common for smaller format advertising to carry content with motion, as demonstrated by the renewal consents for the Manchester Loop applications in 2003.

Although assessors noted there to be no digital screens located within the vicinity of the stop, there were also no visibility issues around the track for drivers and no access for other vehicles. The preferred option is to replace the existing 3no. 6-sheet advertising boards with digital screens on platforms B, C, & D and not to proceed with a new freestanding display on the platform. As such this element of the proposal was removed.

Summary and Conclusion

The proposal seeks consent for two digital advertising displays containing 3no. digital posters, replacing 3no. existing paper poster panels on the platform at St Peter's 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, by virtue of its platform-level position, modest scale and the replacement of existing advertising within a busy civic and commercial square, will have a limited visual effect, in keeping with the established character of its surroundings, thereby preserving the character and appearance of the surrounding conservation areas and the settings of the listed assets. 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.

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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,

[redacted]

Ben Kelly
Planning Consultant
DD: [redacted]
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