AdFolio

02 July 2026

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

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

Market Street tram stop, Manchester, M1 1WA

Dear Sir/Madam,

Please find enclosed an application for advertisement consent for two digital poster panels, replacing existing paper poster panels on the platform at Market Street tram stop.

The existing panels display advertising and customer information, replaced manually on a fortnightly basis. The proposed replacement displays will be digital display units and therefore 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.

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 Market Street, adjacent to Piccadilly Gardens in central Manchester (Figure 1).



Figure 1 - Location in aerial view

The area around the site 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.

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 surrounding buildings typically comprise 4-5 storeys above ground floor retail units.

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.

In accordance with the policies map, the site is within the designated City Centre Primary Shopping Area. It is within the Smithfield Conservation Area at its boundary. The station platform is not listed but there are Grade II listed buildings and monuments on and around Piccadilly Gardens, including the Rylands Building (Debenhams); Electricity Junction Box, Tib Street; 1 Piccadilly; 15 and 17 Piccadilly; and the Peel Statue.

Site Planning History

There is no planning history in relation to the site itself. At 106-122 Market Street (Primark) an application for various internally illuminated fascia signs, projecting signs and high level signs was approved last year (Ref: 142017/AO/2025).

Of greater relevance is the approval of a digital totem at Piccadilly Gardens, originally in and then renewed in 2023 with the addition of motion content. (Ref: 137215/AOH/2023)

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 poster panels, replacing existing paper poster panels on the platform at Market Street 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).

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 - 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. 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 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 in 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 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.

The Joint Development Plan Document (JDPD) places a strong focus on digital connectivity and on the provision of a clean, integrated and accessible transport system. In accordance with Policy JP-C1 improving digital infrastructure is a high priority. JP-C2 highlights the ambitions to build on the success of Metrolink through measures to improve reliability, capacity and customer experience. 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 just off Piccadilly Gardens, within a highly commercial part of the City Centre where advertising, including digital and internally illuminated displays, is an established and expected feature of the street scene. 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 within the primary retail area in Manchester and is within the Smithfield Conservation Area. The site consists of a station platform, where there is already advertising. Most of the surrounding uses are commercial in nature, with advertising at ground floor and ground floor fascia level.

The proposals will be an expected element of a station platform within a central shopping area and will add to the digital infrastructure in the City, supporting advertising and therefore supporting the retail function of the area, whilst also supporting investment in the Highway network and providing a platform for TfGM to present public messaging.

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. 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.

The proposal site is within the Smithfield Conservation Area. Development control in Smithfield is aimed at encouraging development and activity which enhances the prosperity of the area, whilst paying attention to its special architectural and visual

qualities. The main criterion for assessment of development in this area is about fitting into an established street pattern with the scale of development proportions and materials of major concern. The appraisal for the area states that all new development proposals are considered in their context.

Whilst the station platform is not listed, there are Grade II listed assets proximate to the site including:

- Rylands Building (Debenhams) – Grade II Listed building immediately to the north of the site. The asset is appreciated in views from Market Street and Piccadilly Gardens. Almost all existing views of the building take into account the station platform and its current advertising panels. The setting of the asset is within a commercial retail environment with ground floor shopfronts often containing digital screens. Impacts on this view must be considered in this context. The proposal would therefore have no impact on its overall significance.
- 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 corner of Market Street and Tib Street. Similarly to the Rylands Building, the is appreciated in the same views as the proposal site, although perhaps less prominently.

The predominant view of the advert would be from close quarters at the Station Platform itself. Given the highly commercial environment and that existing adverts are being replaced, no harm is attributed to the setting of any of the identified Heritage Assets identified.

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, 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 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 at Market Street.

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.

The conclusions for Market Street state that the digital screen should be permitted, noting that there are digital screens in proximity and that no collisions have been reported in the previous 36 months. Most recently, a renewal consent was granted for a full motion digital totem in Picadilly Gardens in 2023 (LPA Ref: 137215/AOH/2023).

Summary and Conclusion

The proposal seeks consent for two digital poster panels, replacing existing paper poster panels on the platform at Market Street tram stop. The existing "6-sheet" advertisement panels display advertising and customer information, replaced manually on a fortnightly basis. The proposed display units will carrying a rotation of adverts and public information provided remotely from a central location.

The proposal will not obstruct the highway or impede movement and will have minimal visual impact, by virtue of replacing an existing illuminated advert of a similar size. It represents a modern efficient means of delivering important information to the public whilst generating revenue to the applicant for investment in public services. The proposal is entirely suited to the commercial location and should 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,

[redacted]

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