AdFolio

30 June 2026

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

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

Piccadilly Gardens tram stop, Manchester, M1 1RN

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 Piccadilly Gardens 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

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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 Piccadilly Gardens, on Parker Street in central Manchester (Figure 1).

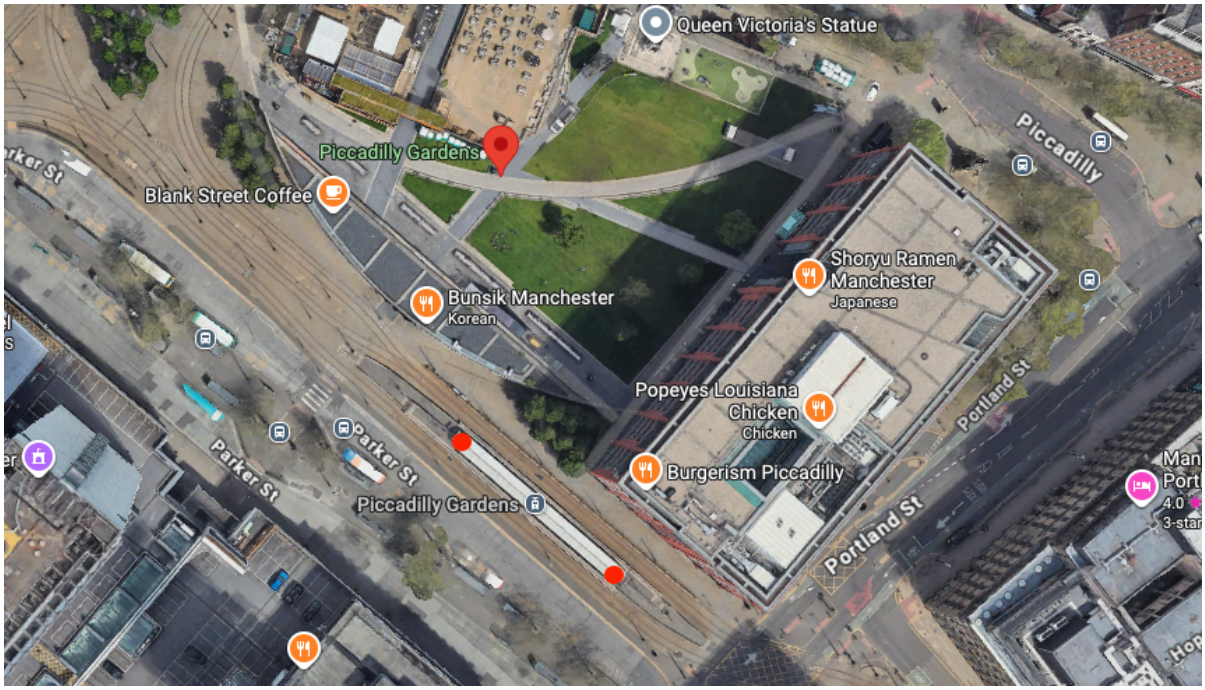


Figure 1 – Location in aerial view

Piccadilly Gardens is one of the largest public squares in the City Centre and a principal pedestrian and public-transport interchange, with a high footfall of shoppers and commuters and tram, bus and pedestrian routes converging on the site. The surrounding area is highly commercial and mixed-use, comprising retail, hotels, leisure and offices, with a large-format high-level digital display on the Mercure Hotel and ground-level bus-shelter advertising already present in the immediate vicinity.

According to the Council's adopted Policies Map, the site is within the City Centre. It is not within or adjacent to a conservation area. The station platform is not listed, and the nearest listed buildings, including the Grade II listed former Portland Hotel and the Grade II listed statues within Piccadilly Gardens, are substantially separated from the site.

Site 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:

- 130397/AOH/2021, advertisement consent for the replacement of six existing freestanding advertising units with six 'Forum' street-furniture advertising units at locations across the Core City Centre, permitted September 2021.

These units are comparable to the proposed units and were approved by the Council in a variety of locations, including at Piccadilly Gardens.

At appeal, the Planning Inspectorate has allowed advertisement displays in the immediate vicinity, including for digital street-furniture displays outside No. 55 and No. 1 Portland Street close to the application site (APP/B4215/Z/17/3190107 and 3190108). In the context of this application, the comments from the Inspector at paragraph 7 are relevant, in stating:

> *"I agree with the Council that this stretch of road is fairly cluttered but given that the kiosk, with its non illuminated advertisement, is already in position I do not consider that swapping the existing non-illuminated sign with an illuminated one, on this busy City Centre street, would add unacceptable clutter to the street scene. I also see no reason why this modest advertisement would detract from the regeneration efforts, improvements or the image of the City Centre".*

The application proposals are also replacing existing posters and would not add unacceptable clutter or detract from regeneration efforts.

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 Piccadilly Gardens tram stop (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 – 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) and DC19 (Listed Buildings) are noted for completeness; the site is not within a conservation area and is well separated from the nearest listed buildings, such that neither is engaged in any material way.

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 at the edge of 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 proposals replace existing advertising panels on the platform with digital counterparts of a comparable scale and position, and will generate additional revenue for investment in the transport network, as well as providing a platform the TfGM's own campaigns and public information, thereby supporting the commercial and transport function of the area.

Given the established commercial and already-illuminated character of the immediate area, the replacement displays would be neither unduly assertive nor incongruous in their surroundings. This is consistent with the approach of the Planning Inspectorate, which has repeatedly found illuminated advertising acceptable on Piccadilly Gardens itself, most recently allowing a digital street-furniture display nearby at 3-10 Piccadilly (APP/B4215/W/24/3347777, 2025), where the Inspector found no harm to listed-building and conservation-area settings. The replacement of existing poster panels with digital counterparts was agreed as acceptable in principle at pre-application stage.

Heritage Impact

The site is not within a conservation area. The station platform is not listed, and the nearest listed buildings, the Grade II listed former Portland Hotel and the Grade II listed

statues within Piccadilly Gardens, are substantially separated from the proposal site and are appreciated within a busy, commercial setting in which advertising is already present. The proposal, which replaces existing advertising panels of a comparable scale, would have no impact on the significance of any heritage asset or its setting.

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 onsite surveys and subsequent assessment have identified that there is space available at the site and there would be no adverse safety or operational impact from the installation of digital advertising boards.

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 the Piccadilly Gardens site confirm that the digital displays should be permitted. It is noted that there are other digital screens that are in the drivers eyeline in close proximity and that the 36 month accident data did not indicate there to be a resulting problem.

Summary and Conclusion

The proposal seeks consent for two digital poster panels, replacing existing paper poster panels on the platform at Piccadilly Gardens tram stop. The existing "6-sheet" advertisement panels display advertising and customer information, replaced manually on a fortnightly basis. 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 will have a limited visual effect, in keeping with the established character of its surroundings, by virtue of replacing an existing advert of a similar size and position within a highly commercial, already-illuminated City Centre location. 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 its 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]

[redacted]
Planning Consultant
DD: [redacted]
Email: [redacted]