

DELEGATED PLANNING APPLICATION REPORT

Ward: Coley

App Ref: 230533/ADV

Address: Highway Verge, Junction of the A33 and Rose Kiln Lane, Reading, RG2 0JZ

Proposals: Single leg freestanding advertising structure featuring two internally illuminated sequential display screens

Case Officer: Gary Miles

Date received (valid from): 20 April 2023 **Target Decision date:** 5 July 2023

1. SITE DESCRIPTION

The application site is located on council owned land opposite the Marshall Volkswagen dealership showroom, between a service road serving car showrooms and various other commercial business units and the A33 Reading relief road. The area of land doubles as a traffic island and a grass verge with well-maintained mature hedgerows and blossom trees. Opposite the application site in a north westerly direction are a number of unoccupied office buildings which are currently being converted into residential apartments. The application site is in close proximity to a large and busy traffic light controlled junction. The area in the vicinity of the application site is largely commercial, it is not within an area of conservation nor close to any heritage sites. The application site sits on land which will be used for the next phase of the Mass Rapid Transit scheme as set out in the Reading Borough Council Local Plan 2019.

Site Visit Photos



Looking in a south-westerly direction



Looking in a south-easterly direction



Looking in a westerly direction

2. PROPOSAL AND SUPPORTING INFORMATION

Advertisement consent is sought for the installation of a single-leg free standing advertising structure featuring 2x internally illuminated sequential display screens.

Two display screens proposed to be positioned at 58.5 degrees to one another supported by one leg, the visible display will measure 3.1m in height and 6.2m in width.

The proposed sign will be internally illuminated and can be calibrated to a brightness of 2500Cdm² Max and a 300Cdm² night time limit although it is not clear from the documents submitted what the actual limits of brightness will be. The display will show illuminated static images that are automatically changed in sequence, typically up to four separate advertisements at any one time.

The proposed free standing advertising structure and supporting structure leg will measure a combined height and width of 7m x 7m.

The proposal includes a section of land to the front of each screen to be laid to hardstanding to facilitate cleaning with another area to the side laid to hardstanding to accommodate the parking of a maintenance vehicle, presumably the proposed access would be from the service road via a dropped kerb and the removal of a section able railings. Note there is no mention of applying for a dropped kerb and footway crossing as part of this application.

Plans / Documents Considered:

Application Form

Stage1/2 - Road Safety Audit - dated June 2022

Part 1 Roadside Advertising Proposal April 2023 (supporting text, specification and illustrations)

Part 2 Roadside Advertising Proposal April 2023(supporting text, specification and illustrations)

Wilmotte Leg Detail for 2 D200 Digital Displays. Steelwork Detail Sheet 1 - dated June 2021)

Visibility Splays - produced by Stantec - dated August 2022

Vehicle Swept Path Analysis - Sheet 1 of 3 - produced by Stantec - dated August 2022

Comparable Sites Crash Map Data - dated August 2022

Decision Notice for application ref 211148 - at Rose Kiln Court, Rose Kiln Lane, Reading, RG2 0HP - dated September 2021

Received by the local planning authority on 20th April 2023

3. RELEVANT PLANNING HISTORY

Application Ref: 230264 - Installation of replacement signage. Decision: APPROVED (after working with agent and considerably reducing the intensity of the proposal).

Application Ref: 221375 - Single-leg free standing advertising structure featuring 2X internally illuminated sequential display screens. Decision: WITHDRAWN by agent day before decision date.

Application Ref: 171582 - 48 Sheet Digital Advertising Board located at land at A33 Relief Road, Rose Kiln Lane. Decision: REFUSED

Application Ref: 151215 - Display of x1, 48 sheet LED Media Display Screen located at junction of Vastern Road ND Bagnall Way. Decision: REFUSED

Application Ref: 160123 - Display of 1x Single sided 48 Sheet LED Media Display Screen located at 120 London Road. Decision: REFUSED

4. CONSULTATIONS

4.1 Internal Consultation

Transport Development Control
Transport Planners
CCTV Townsafe Radio Controller
Environmental Protection

Transport Development Control:

I have reviewed the proposed development which is a resubmission of planning application 221375, which was withdrawn, and I comment as follows:

The proposed development consists of the erection a double sided 48 sheet display in a 'V' format. The advertisement displays will be illuminated and show only static images that change every 10 seconds, and which will switch off between 11:59pm and 6:00a.m. The max night time luminance will be 300 Cdm².

I have reviewed the information that has been provided by the applicant and in particular the Stage 1 / 2 RSA which states the following at Paragraph 1.15:

Furthermore, due to the low collision rate and the details available to the Auditors regarding this collision, they are unable to positively determine with any certainty whether the proposed installation will have any material impact on collision rates. On this basis, the Auditors would recommend that a stage 4 Road Safety Audit is conducted in order to review any recorded collisions post installation of the works subject to this Audit.

This therefore confirms that the Road Safety Auditors are unable to confirm whether the proposal will result in an increase in accidents. Paragraph 3.1 of the RSA (see below) does state that they do not believe the displays would result in a material increase in risk to road users but again this does not confirm that there would not be any increase and would conflict with the comments made at Paragraph 1.15, referenced above.

Paragraph 3.1

Subject to the recommendation made in Section 1, paragraph 1.15 of this Audit report and having carefully inspected the site and adjacent highway links and roadside environment and observed road user behaviour and assessed the information provided by the Design Team (JCDecaux) the Auditors consider that no material increase in risk to road users will arise as a result of the proposed double sided illuminated advertisement display board, adjacent to the A33.

This information was previously reviewed by the Highway Authority as part of planning application 221375 and it is noted that JCDecaux responded as follows to the Highway Authority concerns (a copy of the email is attached):

I note your comments as to roads safety implications and the fact that the RSA is not, nor can it be, definitive in terms of accident occurrences. It is difficult if not impossible to

prove a negative hypothesis. This equally applies to any anecdotal comment that the present of the advertisement would lead to prejudicial road safety conditions. The purpose of the RSA and the comparable examples of similar schemes is to reinforcement the view that the scheme is unlikely to lead to dangerous conditions. It is a view, nevertheless the view of a qualified professional auditor so I would suggest it should be attributed some weight in the assessment, particularly as it is supported with examples whereas the contrary view is unsupported by any empirical evidence of cause and effect due to roadside advertising displays.

What is clear from this response is that JC Decaux cannot confirm that the proposal will not have a detrimental impact on road safety. It should therefore be stated that the Highway Authority advised the applicant prior to the original planning application submission to undertake a review of the accident statistics prior to and after the introduction of other similar proposals to ascertain whether the introduction of the display screen would result in a hazard to the Public. The only information that has been provided is information of accident data post the installations but this does not provide sufficient information/clarity regarding the potential impact of the display.

The Highway Authority have therefore reviewed the information and comment as follows:

A409 - GEORGE GANGE WAY - HA3 7FD

The information below presents accident data for a 3 year period pre installation between 2016-2018. It is noted that the advertisement display relating to this site was erected on 12 November 2018 but it is advised that no accidents occurred post this date and therefore the two accidents identified in the image below were both pre installation. The information confirms that 2 accidents occurred at the roundabout pre installation with an additional 2 located further north however, these have not been taken into account given that the advertisement screen only faces south and drivers would have passed the point at which the screen could be viewed. All the accidents are identified as slight in terms of their severity.



The below information presents accident data for a 3 year period post installation between 2019 and 2021. This information confirms that post installation there has been a total of 5 accidents at the roundabout albeit that one of the accidents is identified off the carriageway, it is however assumed that this has been located incorrectly. This data alone identifies an

increase in the number of accidents and also identifies two of the accidents as having an increased severity i.e. serious.



I would also stress that the accidents identified at the junction would all be on approaches to the roundabout where the screen would be clearly visible to the driver and as such could have been a distraction that resulted in the collisions.

View from the South



View from the North



Given the increase in number a severity of accidents at the junction further accident data should be provided which should be gathered from the appropriate Highway Authority to understand more about the cause of the accidents.

A4005 - GREENHILL WAY - HA1 1HS and A61 - PARK SQUARE ROUNDABOUT - S1 2BP

I have reviewed a before and after of the accidents at these respective sites and the number, severity and location of accidents have not changed pre and post installation of the advertisement display.

What should also be stressed is that the post installation accident data should be weighed against the fact that this data would have been during COVID 19 when traffic flows significantly reduced and as such this would have a correlating knock on effect to the number of accidents on the Highway Network. Given that this is a resubmission of a previous application the applicant should contact the appropriate Highway Authorities and request the accident data directly as they may be able to obtain data for all if not part of 2022 therefore providing a greater level of comfort.

In relation to the documentation that has been submitted I reference document PART 1 Roadside Advertising Proposal April 2023 and in particular Page 5 which includes the proposed Block Plan. However, it is noted that the Block Plan included within the document differs from the actual Block Plan accompanying the planning application. It would therefore need to be confirmed what plan the Highway Authority should be assessing against. What is clear is that the actual Block Plan still appears to conflict with the A33 BRT scheme given that this has not been incorporated within the proposed design.

It should also be highlighted that the document PART 1 Roadside Advertising Proposal April 2023 on Page 7 includes a section on Comparable Example which refers to A56 in Manchester. However, when I have reviewed this particular site I would not consider this comparable for numerous reasons which include the following:

- The advertisement display is located directly adjacent to an access for an individual car dealership and not an uncontrolled junction whereby two-way movements would occur.
- The number of movements generated by the proposed comparable site would generate significantly less movements than the application site.
- The access does not accommodate any pedestrian and or cycle movements running alongside the main road or the access road.
- The nearest main junction along the main road from the advertisement display location would be 630m to the west and 470m to the east there is therefore unlikely to be queues extending back to the locality of the advertisement display. However, the application site is located within 130m of a junction to the west and 545m of a junction to the east. It should be stressed that the queues from the junction to the west regularly extend back to the application site and beyond in particular in the PM Peak periods therefore creating a further reason for drivers to be fully focused on the road ahead.

In addition to the above I have noted that the site in question as of May 2023 does not have an advertisement display and also I can find no reference for this on any planning portal for Trafford and / or Manchester Council.



Given the above I am unable to accept the proposed comparable site in order to accept the proposed advertisement display.

Reference has also been made to planning application 190523/FUL, which is included in the RSA report at Appendix C but no text has been provided to explain its inclusion. Irrespective of this I must advise that the application site is not comparable to that permitted as part of the 190523/FUL proposal. The advert/display within the 190523 permission is located 87m south of the nearest junction providing some separation between the advert/display and the point at which vehicles are required to undertake a turn, stop for the change in the lights etc. The proposal proposed as part of this planning application is located directly adjacent to a junction on the A33 and as such would be contrary to National Planning Policy, which stipulates the following:

Paragraph: 067 Reference ID: 18b-067-20140306 Revision date: 06 03 2014

All advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline.

Paragraph: 068 Reference ID: 18b-068-20140306 Revision date: 06 03 2014

The main types of advertisement which may cause danger to road users are:

(b) those which, because of their size or siting, would obstruct or confuse a road-user's view, or reduce the clarity or effectiveness of a traffic sign or signal, or would be likely to distract road-users because of their unusual nature;

(d) those externally or internally illuminated signs (incorporating either flashing or static lights) including those utilising light emitting diode technology:

i. where the means of illumination is directly visible from any part of the road;

ii. which, because of their colour, could be mistaken for, or confused with, traffic lights or any other authorised signals;

iii. which, because of their size or brightness, could result in glare and dazzle, or distract road-users, particularly in misty or wet weather; or

iv. which are subject to frequent changes of the display;

The proposed development is located directly adjacent to a junction along the A33 and will provide a distraction to those drivers travelling along it and those utilising the junction to either enter or exit at the junction. As set out above the proposed development would be in direct conflict with the above National Policy and would result in a detriment to Highway Safety.

The Highway Authority have also been successful in the defence of such proposals close to junctions with the three appeal decision notices confirming that Planning Inspectors are in agreement with the Highway Authorities assessment. These applications include:

171582 Land at A33 Relief Road, North of Grosvenor Casino
151215 Vastern Road
160123 120 London Road

The location of the proposed display would be located directly adjacent to the A33 Reading Relief Road which has been subject to numerous phases of the Mass Rapid Transit scheme to provide dedicated bus lanes along the A33 between the Reading Town Centre Area and Junction 11 of the M4. The latest phase coming forward would be the south bound section adjacent to the application site, which will require the use of the adjacent Public Highway not only to create the widened carriageway but to facilitate the provision of any lost trees and or landscaping.

As indicated previously within this response the proposed Block Plan has failed to illustrate the proposals within this scheme and as such the proposed development would restrict the Council in their ability in bringing forward important transport infrastructure that is listed within the Local Plan. The scheme should therefore be resisted on this basis.

In addition to this the proposal includes the provision of a hard standing area for future maintenance, however the document PART 1 Roadside Advertising Proposal April 2023 stipulates the following on page 11:

The advertising display panel which holds the LED modules is a self contained unit that is capable of showing illuminated static images that are automatically changed in sequence, typically up to four separate advertisements at any one time. **The advertisements will be changed remotely by means of an ISDN feed therefore there is no waste material associated with printed displays that are changed every two weeks** and then recycled or, in the case of backlit vinyl, disposed of via landfill. **The reduced need to visit the site means a biannual visit is necessary for routine maintenance.**

I have highlighted the most relevant sections of that text which confirms that the displays will be managed remotely and physical visits will only be required 1 every two years. This would not seem an appropriate reason to lose a section of grass verge.

The location of the access is also located on the bend where the private service road joins the entry / exit junction onto the A33, this will result in conflicting movements more so given that the access would require the existing pedestrian barrier to be removed so that access could be gained. Sufficient details have therefore not been provided to accompany the application in relation to this access but it is likely that any vehicles movements utilising this access would result in reversing movements into the junction that could result in conflict between vehicles and therefore a new access point could not be supported.

As a result of the above National Policy and the comments above the Highway Authority objects to the development on the following grounds.

Suggested reasons for refusal if refused

The siting and sequential images displayed on the proposed LED media display screen would distract drivers in a location where there is conflicting vehicle movement and high flows of traffic. This could result in sudden and unpredictable vehicle movements, increasing the risk of collisions with other vehicles or pedestrians. This would be in conflict with Local Plan Policy TR3 and Paragraphs 067 and 068 of the National Planning Policy Guidance (NPPG).

The proposed development would have an adverse effect on the Mass Rapid Transit scheme and, as a result, would be in conflict with Local Plan Policy TR2

The formation of a new junction/access in close proximity to the junction with the A33 would result in conflicting traffic movements having an adverse effect on road safety and the flow of traffic. This would be in conflict with Local Plan Policy TR3.

RBC Transport Planners:

We will be taking some of the existing pavement to make the bus lane, using some of the grassed area to relocate the pavement/cycle facility and intend to plant compensatory trees and vegetation at this location to compensate for any potential loss of trees at other phase 5/6 locations. The proposed sign would appear to conflict

with these intentions, and I agree with the previous statements regarding it being a potential distraction.

RBC CCTV Townsafe Radio Controller:

There is a traffic camera just opposite this site by Matalan, so this could impact on the viewing from this camera.

RBC Environmental Protection:

Further clarification is sought regarding the location of the nearest residential property to this development and the view they will have of the advertisement. It is understood that some of the properties on the other side of the road from the VW dealership have applications to convert to residential use.

I am concerned about the impact on residential amenity due to the large size and elevation of the illuminated screen.

4.2. External Consultation

Thames Valley Police:

No comments received.

Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

5. LEGAL AND PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework
National Planning Practice Guidance

Reading Borough Local Plan (2019)

CC7 (Design and the Public Realm)
CC8 (Safeguarding Amenity)
OU4 (Advertisements)
TR2 (Major Transport Projects)
TR3 (Access Traffic and Highway-related Matters)
EN8 (Undesignated Open Space)

EN12 (Biodiversity and the Green Network)
EN14 (Trees, Hedges and Woodlands)

6. APPRAISAL

Taking all of the information in to account from the internal consultees, officers do not consider that the proposed siting of the electronic advertisement adjacent to a busy classified road near to a traffic signalled junction would be acceptable in terms of Highway safety and that is a conclusion shared with previous Planning Appeal decisions, three of which refer to placements of advertisements at or near junctions within Reading.

Concerns are raised that the size and prominent location of the proposed electronic advertisement would appear as an unattractive and prominent feature, it would have a visual dominance and have an overbearing effect on the surroundings and contribute towards an undesirable proliferation of signage and visual clutter at this location. The proposed advertisement would therefore result in harm to the visual amenity character and appearance of the area contrary to Policy OU4 (Advertisements) and Policy CC7 (Design and the Public Realm) and Policy CC8 (Safeguarding Amenity) of the Reading Local Plan 2019.

The proposed electronic advertisement also includes three sections of hardstanding to facilitate parking for maintenance and cleaning vehicles. At present the area includes a grass verge with well-maintained mature hedgerows and blossom trees maintained to a high standard. The land provides an open landscaped area which provides visual softening to and relief from the extensive and visually dominant highway at this location. The proposal would erode the quality of this existing open space and harm the visual qualities of the area contrary to Policies CC7, OU4, EN8, EN12 and EN14 of the Reading Local Plan 2019.

The siting and sequential images displayed on the proposed electronic advertisement LED media display screen would distract drivers in a location where there is conflicting vehicle movement and high flows of traffic. This could result in sudden and unpredictable vehicle movements, increasing the risk of collisions with other vehicles or pedestrians. This would be in conflict with the Policy TR3 of the Reading Local Plan 2019 and Policies DM12 (Access, Traffic and Highway-Related Matters) and DM22 (Advertisements) of the Sites and Detailed Policies Document 2012 (altered 2015) and Paragraphs 067 and 068 of the National Planning Policy Guidance (NPPG).

The proposed electronic advertisement is to be sited on land opposite a recently renovated residential development comprising of studio and 1 and 2 bedroom apartments. Concerns are raised by the Environmental Protection Officer over the impact on visual amenity due to the large scale and elevation of the proposed illuminated screens. Based on this the proposal is contrary to policies CC8 of the Reading Local Plan 2019.

Policy DM22 states that “new advertisements will respect the building or structure on which they are located and/or their setting in terms of size, location and will not have a detrimental effect on public safety”. The NPPF paragraph 67 states that “poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Only those advertisements which clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority’s detailed assessment”.

The location of the proposed electronic advertisement display located directly adjacent to the A33 Reading Relief Road which has been subject to numerous phases of the Mass Rapid Transit scheme to provide dedicated bus lanes along the A33 between the Reading Town Centre Area and Junction 11 of the M4. The latest phase coming forward (proposed to

commence Autumn 2023) is the south bound section adjacent to the application site, which will require the use of the adjacent Public Highway not only to create the widened carriageway but to facilitate the provision of any lost trees and or landscaping. The proposed development will therefore restrict the Council in their ability in bringing forward important transport infrastructure and this would be in conflict with the Policy TR2 of the Reading Local Plan 2019.

CONCLUSION

Overall it is considered that the proposal at this site would harm the interests of visual amenity and be harmful to public safety and is therefore in contrary to the Regulations and Policy guidance for proposed Advertisements.

RECOMMENDATION

REFUSE