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Development Management
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

9 October 2024

Dear Sir / Madam

Application for Express Advertisement Consent, East Facing Wall under canopy of Oxford Road Entrance, Broad Street Mall, Broad Street, Reading, RG1 7QE

Please find enclosed our client's application for Consent to Display Advertisements under Regulation 9 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

This application seeks the following:

Continued Display of two no 0.7m high x 3.1m wide occupiers signs and one no 6.2m wide x 4.2m high LED screen display.

Renewal (in part) of 17/0383ADV & 16/1247ADV

The application comprises the following documents and drawings:

- Express Consent Application Form
- Drawing no. T4850 A4 050 rev – Site Location Plan
- Drawing no. T4850 A4 051 rev – Site Plan
- Drawing no. T4850 A4 060 rev – Elevations (existing & proposed)
- Appendix 1 - Schedule of Suggested Special Conditions
- Appendix 2 – Images of existing signage

The fee has been paid via the Planning Portal.

Proposal

This application seeks to consent to retain the existing three signs under the canopy of the Oxford Road entrance to the Broad Street Mall in central Readings retail & leisure area.

There is no change from the existing situation to the location, size or shape of the signage proposed.

The Application Site

The application site is set on the Broad Street Mall, a large town centre development in mixed use comprising retail, leisure, offices and car parking.

The signage (as existing and proposed) is located externally towards the north-east corner of the host site, above the Oxford Street entrance.

The proposal is readily accommodated on the host site, with no loss of employment opportunity, parking or circulation space.

The host site is not a Heritage Asset.

Application Site Planning History

The existing signage was permitted under Reading Borough Council reference 17/0383ADV, a consent dated 3 May 2017 that contained 'take down' provision within its conditions.

Our clients were not made aware of this situation by their predecessors.

It is this condition that requires an application to retain the signage at the host site.

A similar proposal was also approved by the council under reference 16/1247ADV.

The host site has a range of commercial consents in place, commensurate with its mixed use, town centre position.

Adjacent Land Uses

The site is situated within the vibrant centre of Reading in the main retail and leisure area.

Nearby occupiers and the host site have their own signage and shop fronts, the street is high-level lit.

Background to the Application

The applicant wishes to continue to deliver mixed, high quality, relevant advertising to central Reading and from a location that avoids more sensitive parts of the town.

The LED display would continue to present a range of static & clip advertisements, each lasting for no less than 10 seconds. The change between each advertisement would be almost instantaneous with no animation or special effects.

The two smaller 'occupiers signs' would continue to be made available to occupiers of the mall itself as required by the availability of units within the scheme from time to time.

Sustainability

In off-peak times (such as overnight), the proposed LED sign can be placed in a low energy mode or entirely switched off to reduce power consumption and reduce equipment utilisation, thus extending hardware lifespans.

This approach therefore promotes an advertising medium that is flexible in terms of both how content is delivered and responsiveness and does away for the need to print, glue and then dispose of vinyl and paper-based media along with the attendant journeys to service and maintain 'traditional' poster displays.

The proposal if permitted, will not harm future generations and can be easily removed at a later date to allow future development needs and as such seeks to align to Sustainable Development aims at paragraph 7 of the NPPF.

The existing signages retention will also reduce the need for the development of a new display elsewhere in the area.

Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Regulation 3 states that advertising should be controlled in the interest of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material.

The National Planning Policy Framework (December 2023) at paragraph 141 reiterates the need for assessment to be conducted only in the interests of amenity and public safety, taking account of cumulative impacts. The NPPF goes on to state that the regime for advertising consent should be simple, efficient & effective.

The NPPF at paragraph 85 places significant weight on the need to support economic growth. Advertising is a key part of economic growth both regionally

and nationally through direct employment in the advertising (& associated) industries and indirectly to those who take advantage of advertising opportunities in the promotion of their own goods and services in addition to Government revenue through local and national taxation.

The 2019 Adopted Reading Local Plan contains Policy in relation to Advertisements at OU4.

The Adopted Local Plan also contains Policy in respect of the host site at CR12d, Broad Street Mall.

Noting the previous consent and the ease with which the existing signage has been absorbed into the street scene, we consider this proposal to be aligned to both Local Plan & National Policy as set out below.

Amenity

As explored above, the application site is located on the commercial Broad Street Mall.

As is evident by inspection, the signs (as existing and proposed) respect the host structure and their surroundings by sitting comfortably in an otherwise blank area of wall on a return in the building line and under a large entrance canopy detail.

It does not cover any windows or an existing sign nor does it cut across any architectural features, rather it sits well within a space that could have been intended for this very purpose.

The signs do not span more than one unit, nor are they located at a heritage asset.

Illumination is proposed to be in accordance with guidelines set out by the Institute of Lighting Professionals so as not to be over-bright or create light pollution. In respect of the LED sign, restricted hours of operating are proposed such that the larger display area is turned off overnight, being brought back to use at 0530 in the morning.

The Mall itself has occupiers that operate until midnight and that open at 5am.

Nearby on Broad Street, coffee shops and retailers open from around 6am, closing at 11pm or later with traffic to nearby bars continuing to midnight and later, particularly at weekends.

Busses run from around 4am.

In general amenity terms, the signs are slim, modern units with their faces not overlooked by any residential properties or other sensitive land uses.

They are well contained by commercial occupiers and road alignment, limiting their visibility to a relatively short section of dynamic, street-lit road and in an entirely commercial context.

Its location in a modern commercial area will continue to see its slim, simple design being readily absorbed into the street scene.

In respect of Policy CR12d, there is no harm to future improvement or regeneration as the sign is located at the edge of the property and can easily be retained or removed by the sites owners as future plans dictate.

There are no other video capable signs of the type proposed in the immediate area with existing shop and premises signage being set back from the proposed site and thus visually separate. As such, the potential for harm from clutter or cumulative impact is low as the application scheme sits neatly as part of the existing vista of signage and overt commercial activity.

Recognising the illuminated nature of the proposed signs, we look to adopt levels recommended by the Institute of Lighting Professionals ('The Brightness of Illuminated Advertisements' PLG05, 2015); in respect of the LED sign that report recommends a maximum luminance level of 300 candelas/sqm in urban & suburban areas at night (and 5,000 cd/m² during the day) and in respect of the occupiers sign a level of 600cd/m².

We have suggested a Special Condition to match this in respect of the LED sign and at lower levels in respect of the occupiers signs.

By way of side note, references in the application form to 'intermittent lighting' is simply a reflection of the sign technology that allows the content (ether static images or clips) to change periodically. There are no flashing, strobing or other similar intermittent lighting effects proposed.

Public Safety (Highways Safety)

Local and National Policy seeks to protect Public Safety.

The proposal is contained entirely on its own land with no part oversailing the highway network.

Illumination in accordance with levels set out (or lower) by the Institute of Lighting Professionals will ensure there is no potential for glare or dazzling that could lead to harm to those using the highway.

As the signs are set into a return on the elevation of the host site, they do not obscure the sight lines of cameras installed for public safety.

Summary

The principle of signage in commercial areas such as this is well established, and we consider that this proposal allows the advertising use to continue following its period of review pursuant to its 2017 consent.

To assist in the future management and safeguarding of the signage, we advance a schedule of suggested special conditions, all considered to be reasonable and enforceable while allowing the use to be economically viable by providing a wider customer base to the LED screen than permitted by the 2017 consent.

Additionally, while we are content that a link to the mall is appropriate to the 'occupiers signage' as they are of a design and appearance that serves to give direction to shop etc units within a larger building, we do not consider it appropriate to see a link in relation to the LED screen as currently exists.

A display on the LED screen is unlikely to be read as directional by members of the public and the linkage to the mall serves no obvious purpose in Town & Country Planning terms.

In terms of the prevention of harm to either safety or amenity; a display on the LED screen for a holiday with (for example) British Airways (who are not located in the mall) is no more likely to harm amenity or public safety than a display for (say) Burger King (who are within the mall).

It is also not the function of the Planning Regime to control individual adverts, that duty rests with the Advertising Standards Authority with the Highways Authority having powers in connection with unsafe structures adjoining the highway.

Should you have any queries in respect of this application or require additional detail we would be happy to discuss this with you.

Yours faithfully.

Stuart Wellman MRICS

Director

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Appendix 1

Schedule of Suggested Special Conditions

1. In respect of the two no 0.7m high x 3.1m wide occupiers signs:
 - a. Illumination shall be static and at no more than 400cd/m²
 - b. May only be used by those connected with Broad Street Mall
2. In respect of the one no 6.2m wide x 4.2m high LED screen display:
 - a. Rate of change shall be no more than once every 10 seconds
 - b. The sign shall not display flashing or strobing elements
 - c. Illumination shall not exceed 300cd/m² at night & 5,000 cd/m² at day
 - d. The sign shall be switched off between the hours of;
 - i. Monday to Thursday midnight to 0530
 - ii. Friday, Saturday & Sunday 0100 to 0530
 - e. In the event of malfunction, the screen shall default to black / power off

Appendix 2

Images of existing signage

