

16 August 2021

Neath Port Talbot County Borough Council
Planning Services

CCUK Ref: 12888/BP
Planning Portal Ref: PP-10122039

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS)
REGULATIONS 1992 (AS AMENDED)**

REEL CINEMA, HOLLYWOOD PARK, THE PRINCESS MARGARET WAY SA12 6QW

In accordance with the Town and Country Planning (Control of Advertisements) Regulations 1992 ("the Regulations"), please find enclosed an application for express advertising consent.

The application comprises the following documents and drawings:

- Application Form
- Site Location Plan
- Site Block Plan
- Existing Elevations NW
- Existing Elevations SE
- Proposed Elevations NW
- Proposed Elevations SE
- Proposed Specifications
- Proposed View NW
- Proposed View SE

The fee of £462 will be submitted via the Planning Portal under the relevant reference.

THE APPLICATION SITE

The application site is situated on the front verge of the Reels Cinema on The Princess Margaret Way.

The proposal is for two internally illuminated 48-sheet (6m by 3m) digital poster displays, each with their own vertical meadow green wall situated underneath.

Clear Channel propose to operate the display in accordance with conditions and limitations used industry wide. Hence, the proposed advertisements will not detract from local amenity or pose a material risk to public safety, as required by the Regulations.

THE PROPOSED ADVERTISEMENTS

The proposed displays would have a landscape profile and a display area measuring 18 sqm. Each display would be enclosed in a pressed metal and reinforced plastic frame that is lightweight and can be erected with limited additional engineering.

The changing displays would present a range of static images on rotation, at the industry standard of once every 10 seconds. Advertisement images would not, therefore, contain any movement, animation, or flashing lights, with the interchange between each advertisement a gradual and smooth fade.

The displays would be illuminated to levels that accord with the recommendations of the Institute of Lighting Professionals ('The Brightness of Illuminated Advertisements' PLG05, 2015); this guidance is accepted as canon by local authorities across the UK.

It states that the uniformity of luminance across a display area must be kept within reasonable limits to ensure a pleasing and effective result. "Pleasing" should be satisfactory in the interests of amenity; "effective" can be taken to be legible and clear. Its recommended maximum luminance levels for illuminated advertisements at night (or hours of darkness) are in Tables 3 and 4 of the document, summarised as follows:

Zone	Surrounding	Lighting environment	Examples	Maximum recommended luminance (cd/sqm) at night (displays over 10 sqm)
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations	200
E3	Suburban	Medium district brightness	Small town centres or suburban locations	300
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity	300

Recognising the changing levels of ambient light throughout the day, PLG05 states that digital displays should never exceed 5000 candela/sqm (cd/sqm). Hence, the displays are controlled by an ambient light sensor system which regulates their brightness, taking into account the changing times of dawn and sunset throughout the year.

The proposed advertisements adjust their output according to the prevailing levels of ambient light, up to 3000 cd/sqm luminance on the brightest of days. While 3000 cd/sqm is the maximum threshold, average luminance of bright colours within advertisements on the brightest of days is around 2500 cd/sqm; on dull overcast days, average luminance of bright colours within advertisements is around 375 cd/sqm.

During periods of darkness, the displays operate at a set darkness setting with a maximum brightness of 300 cd/sqm. The displays therefore operate in full accordance with PLG05 and would never appear overly bright or cause glare.

In addition, content will be controlled remotely in real time and the site will be monitored 24/7 using diagnostics software to facilitate both responsive maintenance and resolve any issues that arise.

With regards the vertical meadow green walls; they are effectively vertical plantations comprising various wild flowering species. Endorsed by bodies such as the London Wildlife Trust, it aims to provide not only a visually appealing element, but also encourage local biodiversity and enhance the natural capital of urban/city environments by attracting wildlife (bees, butterflies etc.).

Installed underneath the advertisements, their modular design includes a backboard, seeded mat and water tank irrigation system comprised of sustainably sourced materials. They will be maintained in accordance with Clear Channel's normal servicing schedules.

To ensure compliance, Clear Channel advance a series of planning conditions, in addition to those applied as standard by the Regulations, as follows:

- i. During periods of darkness, the luminance level shall not exceed 300 candela/sqm as advised by the Institute of Lighting Professionals' publication PLG05 (2015): "The Brightness of Illuminated Advertisements", or any publication replacing or superseding this guidance;
- ii. The screen display shall only show two dimensional static images, shall contain no moving images, animation, video or full motion images and no messaging should spread across more than one screen image;
- iii. The advertisement display shall not change more frequently than every 10 seconds and the rate of change should be instantaneous; and
- iv. The illumination of the advertisement shall not at any time be intermittent.

POLICY FRAMEWORK

The powers to control advertisements under the Regulations may be exercised only in the interests of amenity and public safety, taking account of any material factors.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the primacy of the development plan does not apply to advertisements and therefore local policies are material insofar as they are relevant; they are not decisive. Greater weight is attributed to site specific circumstances.

Annex A of TAN7 states that poster panels should respect the scale of their surroundings and, where possible, good quality hard or soft landscaping, properly maintained, can significantly enhance the appearance of a poster display.

Digital advertising displays of the kind proposed are a more efficient and sustainable media platform compared to their more traditional poster counterparts, whose content remains in situ until they are manually changed. They are fully recyclable, and their

remote operation removes the need for frequent site visits and reliance on non-renewable resources.

By contrast, the VM introduces a feature that is an effective use of land that enhances both the built environment and improves biodiversity. It will be managed and maintained by the applicant throughout the lifetime of the development.

The sustainability benefits of the proposal should therefore be given weight in the local planning authority's assessment.

PLANNING BALANCE

In the interests of amenity, TAN7 advises that in generally commercial areas the scale of poster displays should seek to match the scale of adjacent buildings. In simple terms, there is a preference for locating adverts in commercial areas, adjacent main highways, where their impact is commensurate to the setting.

In this case, the site is located adjacent the Aberavon Celtic Leisure Centre, a Burger King and the aforementioned cinema. It is not within a conservation area, nor are there any listed buildings or other heritage assets in the vicinity which warrant special consideration.

Each advertisement would be illuminated to levels that accord with PLG05. Light sources from streetlamps, buildings and vehicles ensure there is already an existing level of luminance in the locality. Hence, the advertisements would unlikely add so significantly to the existing level of illumination within the area that they would be detrimental, and this is to be conditioned to ensure compliance.

Additionally, the VM would not detract from the character or appearance of the area, but rather enhance its biodiversity offering and soften the appearance of the display in an already urbanised environment, as desired by TAN7.

The proposal would therefore sit comfortably in its visual context and would have no discernible impact on the existing character and appearance of the area.

With regards public safety, all advertisements are intended to attract attention, but there are less likely to be any issues if they are located in commercial areas, as would be the case here.

The road is level, well-lit and the displays would be visible for an appreciable distance allowing drivers to assimilate them and their surroundings. The new advertisements would be internally illuminated and would sequentially show static images rather than moving images or animation; all are to be secured by condition.

There are no unusual complexities here, and the site's offset and elevated position ensures it would not obscure any sightlines or interfere with the clarity of the highway's infrastructure, as desired by the Regulations.

In these circumstances, the proposed advertisements would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Consequently, it is considered that the proposed advertisement would not give rise to safety issues.

SUMMARY

The proposal submitted reflects the applicants' preferences.

Should the Council wish to discuss any aspect of the scheme, Clear Channel would welcome the opportunity to address any concerns prior to determination.

I look forward to receiving confirmation that the application has been validated.

If you require additional information or clarification, please do not hesitate to contact me.

Yours faithfully

Ben Porte

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