

Our Ref: 93456/GM/FS712

4 June 2026



Wiltshire Council
Monkton Park Offices,
Monkton Hill ,
Chippenham,
SN15 1ER

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) REGULATIONS 2007

SITE ADDRESS: ESSO PETROL FILLING STATION, SWAN STREET, PEWSEY, SN9 5HH

PROPOSAL: ERECTION OF D6 SMALL FORMAT ADVERTISEMENT DISPLAY

PLANNING PORTAL REFERENCE: PP- 14986063

Dear Sir/Madam,

This cover letter has been prepared on behalf of Wildstone Estates Limited, an outdoor media infrastructure provider, and is submitted in support of an application for advertisement consent to erect a double-sided freestanding D6 small format advertisement display at the above site.

The site comprises a Petrol Filling Station (PFS) owned by Motor Fuel Group (MFG), the largest independent forecourt operator in the UK. The Company currently has around 1,200 sites which offer customers a growing dual-fuel strategy, a versatile valeting offer and a convenient retail and 'food to go' portfolio. Wildstone Estates Limited is working in partnership with MFG to modernise existing advertising infrastructure across the MFG portfolio and where possible to rationalise and declutter existing advertisements, which aligns with an industry wide programme.

The Proposal

The proposal seeks to erect a freestanding double-sided D6 small format advertising display which will exhibit static advertisements on rotation. This is a standard small format advertisement, which is found across the UK in roadside, retail and transportation environments. There are over 75,000 6 sheets in the UK. The advertisement which is the subject of this application is primarily aimed at users of the PFS and those passing the site along Swan Street.

The proposed D6 small format advertisement display has the same dimensions as a standard 6-sheet hoarding, measuring 1.23m(w) x 2.4m(h) x 0.22m (d). The proposed advertisement will utilise LCD digital technology, which is durable, efficient and can be easily erected with minimal engineering. The quality of the image produced will mimic that of a traditional paper and paste display. The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. The advertisements will comprise local and national campaigns as well as goods and services sold on site.

The D6 small format advertisement display will be monitored and controlled remotely in real time from a Network Operation Centre (NOC) to display advertisements and facilitate responsive maintenance where necessary. Diagnostics software can report any small technical faults (e.g. a broken panel) so that a kill switch can turn the content to black. Engineers are able to respond within 24 hours to any issues which require attendance.

Conditions

All advertisements are subject to the five standard conditions set out in the Regulations. The vast majority of digital advertisement consents now also operate within an established set of parameters that include controls over the level of luminance and the proposed speed and rate of change between adverts. These “industry standard” conditions have evolved over time, in order to address common concerns relating to amenity and public safety.

The proposed display will operate with a system of threshold controls, timers and light sensors to ensure that the luminance never exceeds the ILP guideline figure at nighttime, with lower thresholds set on more sensitive sites.

The published guidelines by the Institute of Lighting Professionals (ILP) have introduced a set of model conditions which can be applied to advertisement consents going forwards. The model conditions are set out within Appendix 1 of Technical Note 5 “The Brightness of Illuminated Advertisements including Digital Displays” (PLG05/23) and are included with this statement for clarity.

The Site

The proposal site is located within the wholly commercial entity of the PFS, and the D6 small format advertisement display will be positioned within the site boundary. The site is located between rural, open fields and a residential area at the south-east edge of Pewsey. The surrounding trees and orientation of the PFS. The central area of Pewsey is a conservation area; however, the proposed site is located approximately 25m outside of this boundary. Additionally, the Highway House is the nearest listed building to the proposal, approximately 70m south of the site. The site is located within an Area of Outstanding Beauty (Policy 91 and 92) (now National Landscape), where developments are required to conserve and enhance the local character of the area. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the proposal would be classified as within Environmental Zone 2 (Rural).



Figure 1: Streetview image of site

Proposal Benefits

The attractiveness of digital advertising to an infrastructure provider is that it allows the advertising network to be better managed, monitored and maintained. For operators the inherent flexibility allows smarter real time campaigns and better control over sales. These factors manifest in wider public

benefits as summarised below:

- Tidy and well maintained sites;
- Improvement to site and local biodiversity where the site allows;
- Uplift in business rates to spend on public services;
- Reduction in vehicle trips leading to reduced noise, air quality, and negative climate change impacts;
- Reduction in waste involved in the advertising poster production process;
- Platforms to broadcast emergency messaging;
- Ability to use void periods for public messaging and public art campaigns; and
- Opportunity to integrate additional hardware to meet Smart City objectives.

These are benefits to development that will not be achieved by maintaining the status quo.

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 interest of amenity and public safety, considering 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 NPPG also clarifies that a local plan does not have to contain advertisement policies and that if such policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

Local Planning Policy

Policy 98 of the Wiltshire Local Plan relates to design and place shaping. The policy states that “...the sensitive design of shop frontages, advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials”.

Planning Considerations

The proposed commercial location is considered to be appropriate in principle for a D6 small format advertisement display and in line with planning regulations, the impact of the proposal has been considered in amenity and public safety terms and are addressed in turn below:

Amenity

National Planning Practice Guidance confirms, at Paragraph 079, that *“In practice, “amenity” is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement...”*. In this case, the immediate neighbourhood is the petrol filling station itself since, in the context of the wider setting, the filling station structures (shop/canopy/pumps and other features) will remain by the far dominant visual attractor. It is a design requirement that petrol filling station forecourts must be “adequately illuminated” at all times, with a minimum design illuminance of 100 lux at ground level (Section 9.5.6, APEA Blue Book – 4th Edition, April 2018). Therefore, the context of the site is one of an already developed, well illuminated commercial operation. The effect on amenity of the proposed D6 advertisement on this well-lit immediate neighbourhood will therefore be minimal.

The surrounding advertisements and illuminated forecourt establishes the site as appropriate for a new illuminated display of this type. The proposed D6 advertisement is smaller in scale than the surrounding PFS infrastructure and the adjacent illuminated totem, as such the proposed advertisement will have a negligible impact on the surrounding environment.

The nearest habitable window is situated circa 40m from the proposed panel. The residential amenity of this property would not be detrimentally impacted by the illuminance of the proposed advertisement directly due to the aforementioned nighttime illuminance controls and the separation distance between the property and the advertisement. Views of the proposed advertisement from the property would be in the context of the PFS itself. The nighttime luminance controls of the proposed displays mean that the impact of the proposed illumination from the D6 displays would have no material impact on amenity of the residents.

The proposal will bear no materially adverse impact on amenity, with the proposal being viewed primarily within the commercial context of the well-lit Esso PFS. In accordance with the categorisations set out in the published ILP Guide PLG 05/23, it is recommended that the maximum nighttime luminance of the display should be set at 300cd/m² which will mitigate any potential impacts at night.

While it is acknowledged that there are residential properties south-east of the PFS, the only window looking onto the site is approximately 40m away. The display would be orientated to face those entering and exiting the PFS rather than directly towards those properties. Given this orientation, the intervening surrounding trees, and the aforementioned sensors used to control illuminance, it is not considered that residents would be adversely affected by the illumination of the signage. In addition, the PFS operates on a 24-hour basis, meaning that the existing site illumination would outweigh any light emitted by the proposed display. In view of the above, it is considered that the development would not result in harm to residential amenity.

With regard to High House, the Grade II listed building, located approximately 70m south of the site, the proposed D6 display would not result in harm to its significance or its setting. The display would be read in the context of the existing petrol filling station forecourt and associated signage, and it would not be directly visible in relation to the listed building due to the bend of the road and the surrounding hedgerows. The forecourt already contains a number of advertisements and illuminated elements, demonstrating that signage is an established feature of the immediate commercial environment. In addition, the display includes light sensors and operational controls to ensure luminance is appropriately managed, particularly during hours of darkness. Taking these factors together, the proposal would not alter the character or appreciation of the setting of the listed building.

The proposal would not be detrimental in either an immediate or wider sense. It is not within a conservation area or attached to a listed building.

Public Safety

When assessing public safety, the key considerations are whether the location is appropriate (i.e. undemanding on the driver) and whether the level of illumination and the sequential change between advertisements is controlled to prevent distraction from the driving task. The petrol filling station is a well-established host of advertising relating to the business premises and products available.

The proposed sign is situated within the PFS site by the exit point onto Swan Street, an uncomplicated location which drivers should be able to navigate with ease. The cognitive demand on road users at this point is low because the road is primarily straight with a slight bend, where clear visibility is constantly maintained. Additionally, those entering and exiting the petrol station will do so at a reduced speed and therefore will be able to safely navigate the immediate surroundings of the advertisement site without issue. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Although the proposed sign will attract attention, as all signs are designed to do, it is not considered that the proposed display is so unusual or the road characteristics so complicated that an advertisement in this location would cause a public safety concern. The proposed panels would incorporate illumination levels which align with the ILP's Guidance, and this intensity is considered wholly acceptable for the location.

Should the Council's Highways department identify any reasons why the location might be challenging to drivers, the applicant would be open to discussing alternative controls. However, it should be noted that the proposed conditions are now well established as best practice and as such any change (e.g. to the rate of change) would be unusual and would need to be evidence based and specific to the location.

Conclusion

The proposal seeks to erect a double-sided D6 small format digital advertising panel at the site which is considered to be an appropriate location for advertising in principle and will contribute to the wider modernisation of the sites which sit within the MFG portfolio. The size and scale of the D6 small format advertisement display is de-minimis in the context of the PFS. PFS sites are an appropriate location in principle for this form of advertising, and the positioning and operational controls have been carefully considered to ensure that the proposed 6-sheet digital advertising display fits in appropriately to the site and the wider surrounding area and will have a negligible impact on public safety.

The proposed conditions to control the operation of the advertisement including the luminance of the digital display will ensure that there is no adverse impact on visual or residential amenity or public safety.

For these reasons and the positive benefits set out, it is not considered that the proposal would have any detrimental impact on amenity or public safety and as such should be capable of being granted consent subject to appropriate conditions to control the operation of the advertisement.

Application Submission

In order to complete the application, please find attached the following documentation:

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - FS712/PA/01 Site Location Plan
 - FS712/PA/02 Existing Site Plan
 - FS712/PA/03 Proposed Site Plan
 - FS712/PA/04 Proposed Site Plan
 - FS712/PA/05 Existing and Proposed Elevations
 - FS712/PA/06 Specification
 - FS712/PA/07 CGI

Additionally, we will arrange payment to the 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,

Gary Morris
Partner

e-mail: gmorris@alderking.com
direct dial: 0117 317 1000