

Objection to Advertisement Application PL/2026/03702

Cannings Hill Garage, Horton Road, Devizes, SN10 2JG

Internally illuminated building signage, PAY/COLLECT booth lettering, digital booth screen and soffit lighting

Objector: Paul Howlett

Address: Elder, London Road, Devizes, SN10 2HF

Date: 17 July 2026

Note on Evidence and Approach

This objection is evidence-led. Its principal factual propositions are drawn from the applicant's submitted documents, with the relevant source identified where material. Where I rely on my own observation, third-party material or indicative measurements scaled from the applicant's drawings, I say so and distinguish those matters from surveyed or applicant-verified information.

The Executive Summary is intended to stand alone. It identifies the principal grounds of objection and the requested outcome. The numbered sections that follow provide the supporting evidence, analysis and application-specific detail.

Advertisement control may be exercised only in the interests of amenity and public safety, and this objection is confined to those grounds. Within them, it advances two related but distinct cases:

1. demonstrated harm: the proposed illuminated and digital signage would cause unacceptable harm to residential amenity and prejudice public safety at the A361/Horton Road roundabout; and
2. failure to demonstrate acceptability: the submitted evidence is incomplete, internally inconsistent, preliminary or does not assess the relevant impact or receptor.

The first concerns the judgment to be made on the evidence available. The second concerns whether the material before the Council is sufficient to support a reliable conclusion on amenity and public safety.

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Executive Summary

I object to advertisement application PL/2026/03702 and ask Wiltshire Council to refuse advertisement consent.

The decisive harm is the cumulative effect of internally illuminated building signage, PAY/COLLECT drive-through lettering, a digital booth screen and soffit lighting forming part of a 24-hour drive-through environment close to homes and beside the A361/Horton Road roundabout. (Sections 3, 5 and 6.)

Elder lies directly opposite the proposed McDonald's site, on the London Road frontage, and forms part of a short run of homes with an open, unscreened relationship to the site.

The applicant's own noise assessment records that dwellings on Elder's side of the A361 "will have full view of the site", confirming the exposed relationship between those homes and the proposed illuminated signage. (Sections 3 and 6.)

The proposed signage is not remote from residential receptors. Measured from the nearest visible part of Elder's residential façade, the nearest south-facing building signage, PAY/COLLECT drive-through lettering and associated illuminated elements are approximately 50–60 metres away; the 8-metre totem proposed under PL/2026/03737, shown as linked context, is approximately 25–30 metres away. These are approximate measurements scaled from the applicant's drawings, not surveyed dimensions. (Sections 3 and 6.)

The proposed signage is not a modest building-identification package. It would form part of a wider illuminated and digitally branded 24-hour drive-through environment, including the 8-metre totem proposed under PL/2026/03737 and the digital menu boards, Play Land sign, banner unit and operational signage proposed under PL/2026/03738. (Sections 1, 5, 6 and 11.)

The proposal would also intensify the roadside-commercial character of this edge-of-settlement approach and erode its relative darkness and tranquillity, close to open countryside. (Sections 4 and 6.)

The submitted documents contain unresolved luminance inconsistencies, including the PAY/COLLECT lettering being specified at 500 cd/m² in the Building Signage Elevations sign schedule, drawing 9045-SA-2029-P009, and in the PL/2026/03702 application form, but 600 cd/m² in the submitted PAY/COLLECT drawing. The applicant's lighting material is also designed for an "E3/E4 Environmental Zone", a higher-brightness suburban or urban-centre classification that requires scrutiny in this edge-of-settlement location. (Sections 8 and 9.)

The application also fails to demonstrate compliance with PLG05 for the correct environmental zone and does not provide clear, enforceable controls for night-time luminance, dimming, operating hours or the digital booth screen. (Sections 8, 9, 10 and 14.)

There is also a public-safety objection. The signage would be viewed close to the A361/Horton Road roundabout, where drivers must already respond to turning traffic, the proposed site access, pedestrian movements, highway signs, road markings, the speed-limit terminal and other illuminated or digital signage. (Section 7.)

The Council should not grant consent unless satisfied that the signs would not distract drivers, add excessive visual clutter, or compete with highway signage at this sensitive junction. (Sections 7 and 14.)

For those reasons and assessed strictly on the statutory advertisement grounds of amenity and public safety, the application should be refused.

Relationship of the PL/2026/03702 signage package to Elder and the A361/Horton Road roundabout

Important note

The two figures below have been prepared from the applicant's own submitted plans, drawings and signage elevations. They are illustrative only and are not measured surveys or scale drawings.

Distances are approximate, derived from scaled PDF drawings; heights are shown approximately to relative scale and horizontal distances are compressed for clarity.

They are included solely to assist the Council's assessment of residential amenity, public safety and the cumulative relationship between the linked applications.

Elements drawn from the linked applications and associated operational context, including PL/2026/03683, PL/2026/03737 and PL/2026/03738, are shown to illustrate the cumulative illuminated environment.

Linked elements and operational context shown in the figures are included solely to illustrate cumulative context. They do not form part of this application and are addressed under their respective applications or, where relevant, under the main application PL/2026/03683.

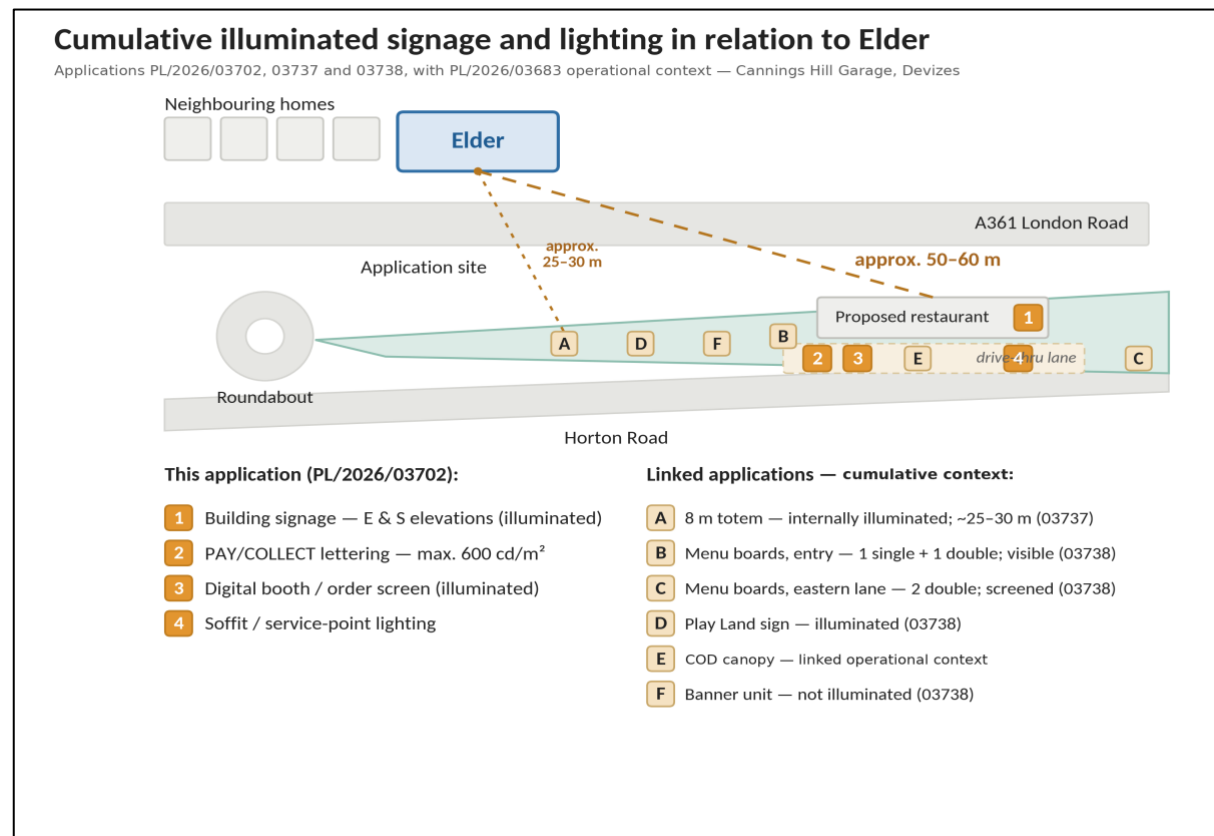


Figure 1 — The PL/2026/03702 signage package (illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting) shown within the cumulative illuminated frontage across the A361, in relation to Elder; based on the applicant's submitted drawings and signage elevations.

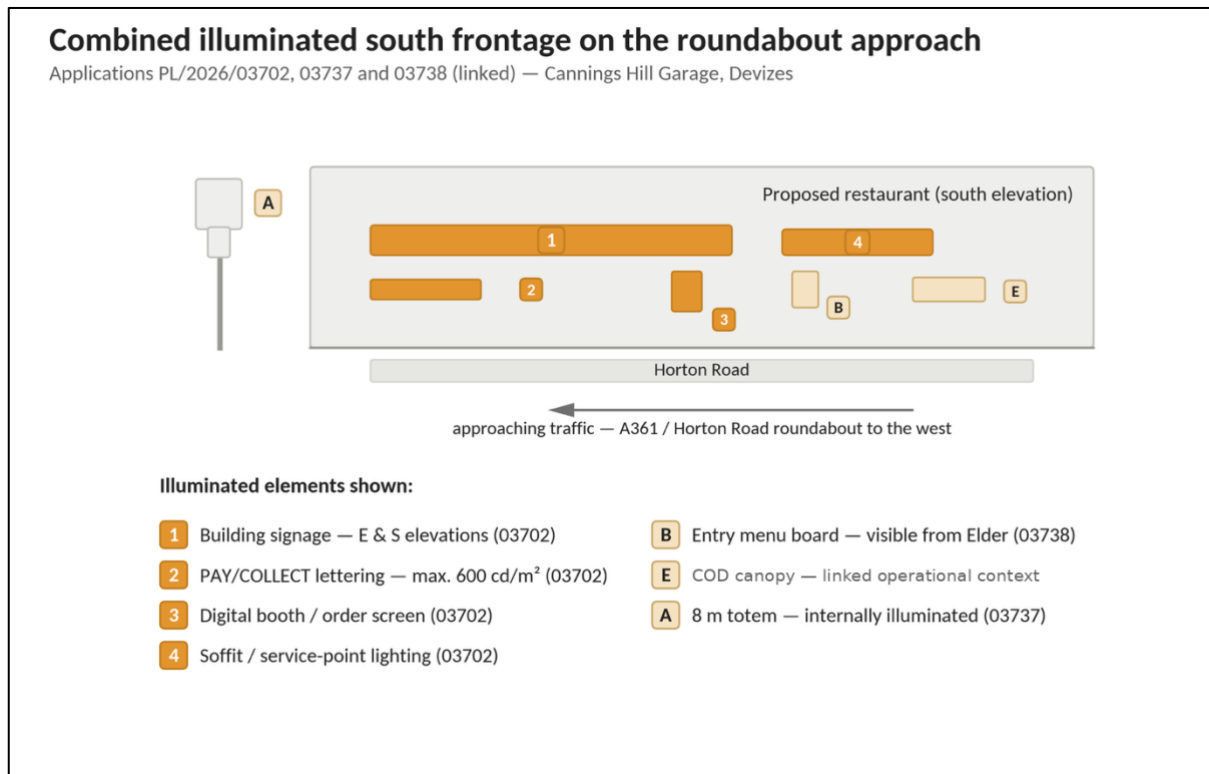


Figure 2 — Indicative frontage elevation on the roundabout approach, showing the PL/2026/03702 signage elements within the wider illuminated drive-through environment. Linked elements from PL/2026/03737 and PL/2026/03738 are shown for cumulative context. Heights are approximate; horizontal distances are compressed; sightlines are indicative only.

The following qualifications apply to the figures above:

- The building signage (item 1) reflects the Building Signage Elevations drawing (9045-SA-2029-P009), which shows illuminated signage to the east and south elevations only. The PL/2026/03702 application form additionally lists signage to the north elevation, which does not appear on that drawing (addressed at Section 9 of this objection and Section 11 of the objection to PL/2026/03683).
- The PAY/COLLECT lettering (item 2) is shown at 600 cd/m², the maximum on the PAY/COLLECT drawing; the P009 sign schedule **and** the application form give 500 cd/m² for the same element. The submitted documents are internally inconsistent as to its luminance.
- The COD canopy (item E) carries a fluorescent tube and illuminated lettering; no luminance value is stated for it in any submitted document.
- The banner unit (item F) is understood not to be internally illuminated; the applicant should confirm. The entry menu boards (item B — one single, one double) would be visible from Elder; the two double boards in the eastern lane (item C) would be screened by the building.

- The 8 m totem (item A) is internally illuminated and stands approximately 25–30 m from the nearest visible part of Elder’s residential façade; in Figure 2 it is shown behind the frontage relative to the roundabout approach.

Requested outcome

My primary position is that advertisement consent should be refused. If the Council is not prepared to refuse the application on the evidence presently available, determination should be deferred until the applicant has provided clear and consistent information on luminance, environmental zone, dimming, operating hours, digital content, visibility and cumulative effects. If, contrary to my primary position, consent remains under consideration, the strict conditions identified in Section 14 should be imposed. Those conditions are a fallback only and do not indicate acceptance that the proposal can be made acceptable in this location. I also ask that the application be determined by Planning Committee and considered alongside the related applications.

Principal Reasons Why Advertisement Consent Should Be Refused

The following are the principal reasons why I consider advertisement consent should be refused. They are developed in the numbered sections that follow and are put strictly on the statutory advertisement grounds of amenity and public safety.

1. Unacceptable harm to residential amenity. The proposed cumulative illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting would sit close to the London Road frontage homes, including a first-floor bedroom at Elder that is used regularly at night. The relevant Elder-facing boundary is shown on the applicant’s Site Layout Plan as a 1.1-metre close-boarded “headlight screen”, which is a ground-level treatment and cannot reasonably be assumed to protect elevated residential windows from the cumulative illuminated environment. (Sections 3, 5, 6 and 8.)

2. The signage would not be experienced in isolation. It would form part of the wider 24-hour illuminated drive-through environment proposed under PL/2026/03683, alongside the 8-metre totem of PL/2026/03737 and the site signage of PL/2026/03738. Its impact should therefore be assessed cumulatively, not as standalone building signage. (Sections 1, 6 and 11.)

3. Inadequate and inconsistent lighting and signage evidence. The submitted material contains unresolved inconsistencies, including the PAY/COLLECT 500 / 600 cd/m² discrepancy and a possible north-elevation inconsistency; the digital booth screen is unspecified as to luminance, content and control; and there is no single consolidated, verified luminance schedule for the full signage package. (Sections 8 and 9.)

4. Public-safety concern at the A361/Horton Road roundabout. The illuminated and digital signage would add visual load close to a sensitive highway environment where drivers must already respond to the roundabout and the speed-limit transition. (Section 7.)

For those reasons, the proposed building signage package would cause unacceptable harm to amenity and raise public-safety concerns. Advertisement consent should be refused.

1. Linked applications

This objection relates to advertisement application PL/2026/03702. However, it cannot be assessed in isolation from the following linked applications, which together constitute the full scope of the proposed development:

- PL/2026/03683 — the main application for a 24-hour McDonald's restaurant/takeaway with drive-through facility, car parking, landscaping and Customer Order Displays;
- PL/2026/03737 — 8-metre internally illuminated freestanding totem sign;
- PL/2026/03738 — site signage, digital menu boards, banner unit, Play Land sign and operational signs.

Taken together, these applications describe a comprehensively illuminated, digitally branded, 24-hour drive-through environment. They should be assessed cumulatively, not as separate and independent applications.

2. The objection is limited to amenity and public safety

Advertisement consent is governed by the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and may be refused only on grounds of amenity or public safety. Amenity includes visual amenity and the general characteristics of the locality.

Paragraph 141 of the National Planning Policy Framework confirms that advertisements should be controlled only in the interests of amenity and public safety, taking account of cumulative impacts, and the Planning Practice Guidance on Advertisements applies the same test.

My objection is put squarely on those two grounds. It is not about corporate branding. It concerns the effect of the proposed internally illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting on residential amenity, including visual intrusion, light spill, glare and night-time impact.

It also concerns public safety, including driver distraction and visual clutter at the A361/Horton Road roundabout, assessed cumulatively with the linked signage applications and the proposed 24-hour use.

3. Residential amenity

I live at Elder, a detached house on the London Road (A361) frontage directly opposite the proposed McDonald's site.

Elder stands at the head of a run of five homes on this frontage. The other four lie between the roundabout and Elder, and all face the site across the road with an open, unscreened aspect.

As the closest dwelling to the site, Elder would be among the most affected. That is supported by the applicant's own noise assessment, which identifies an adverse night-time delivery impact at Elder, and by the odour assessment, which identifies sensitive residential receptors to the north-west, including the London Road frontage.

While I write in my own capacity, the applicant's own assessments indicate that the neighbouring frontage dwellings share the same open relationship to the site, so the amenity concerns described are not unique to Elder.

I do not object to signage in principle. I object to the specific illumination, positioning, digital content and cumulative impact of the proposed internally illuminated building signage, PAY/COLLECT drive-through lettering, digital booth screen and soffit lighting in this sensitive location, close to residential properties and immediately beside the A361/Horton Road roundabout.

Proximity

Using the applicant's scaled PDF drawings, the nearest south-facing building signage, PAY/COLLECT drive-through lettering and associated building-mounted illuminated elements appear to be approximately 50–60 metres from the nearest visible part of Elder's residential façade.

This is an approximate measurement, not a surveyed dimension, and the applicant should be required to confirm the precise separation distance and sightlines to Elder and the neighbouring frontage homes.

The proposed signage is not remote from residential receptors. Its amenity and public-safety impact must be assessed from the perspective of nearby occupiers, including residents of Elder and the other London Road frontage homes, not solely from that of passing motorists, restaurant customers or the applicant.

That open relationship, and the existing day- and night-time context, are shown in the accompanying Schedule of Photographs, taken on 16 July 2026.

4. Relevant policy and guidance

Wiltshire Core Strategy Core Policy 57 is relevant to the amenity assessment. It addresses design, visual amenity, residential amenity, light intrusion and the compatibility of adjoining uses.

In the context of this advertisement application, Core Policy 57 supports the Council's assessment of whether the proposed internally illuminated signage would protect residential amenity, including from light intrusion.

NPPF paragraph 198(c), which directs that planning decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation, is relevant supporting context given the proximity of the proposed illuminated signage to homes.

The ecological lighting requirements in the applicant's own Preliminary Ecological Appraisal are determining considerations for the main planning application rather than for this advertisement consent. I raise them here only insofar as they reinforce the need for strict control over luminance, colour temperature, light spill and hours of illumination in this advertisement application.

5. Nature and prominence of the proposed signage

The signage proposed under this application is not modest building identification. It comprises internally illuminated building signage, illuminated PAY/COLLECT lettering, a digital booth screen and soffit lighting associated with the drive-through operation.

It would be experienced alongside the 8-metre illuminated totem proposed under PL/2026/03737, the digital menu boards, Play Land sign, banner unit and operational signage proposed under PL/2026/03738, and the illuminated ordering infrastructure and site lighting associated with the main application.

The applicant's COD/canopy brochure further confirms that the wider ordering environment would include illuminated "ORDER HERE" lettering, lit canopies and double digital menu-board screens. Taken together, these elements would create a heavily branded and illuminated roadside frontage rather than a limited building-signage scheme.

6. Harm to residential amenity, including cumulative night-time impact

Cumulative lighting context

The main application seeks unrestricted 24-hour operation. The illuminated signage proposed under PL/2026/03702 would therefore contribute to the wider lighting environment during evening, night-time and early-morning periods, when background lighting is lower and residential sensitivity is greatest.

Its amenity impact must be assessed cumulatively with the other illuminated signage, site lighting, internal restaurant lighting, Customer Order Displays and vehicle headlights associated with the development. The relevant question is not the effect of each sign in isolation, but the combined night-time impact of the proposed illuminated drive-through environment on the frontage homes opposite.

Open exposure of the London Road frontage

The applicant's own noise assessment records that the dwellings on Elder's side of the A361 "will have full view of the site", in contrast to the southern properties screened by trees.

That assessment attributes the full, unscreened view to the residential dwellings on the northern side of the A361 generally, not to Elder alone. Elder and the neighbouring residential properties along the London Road frontage therefore share an open relationship with the site and its cumulative lighting environment.

The amenity harm should also be assessed by reference to the first-floor bedroom at Elder. The bedroom has an adjoining en-suite whose window faces the application site across the A361 frontage. Although that window is obscure glazed, obscure glazing attenuates outlook, not light. Because the en-suite has a glazed internal door leading into the bedroom, illumination entering the en-suite would also spill into, and be perceptible from, the bedroom itself.

The building-mounted 03702 signage may not have the same direct residential sightline as the 8-metre totem or Play Land sign. However, it would still contribute to the cumulative illuminated character of the proposed 24-hour drive-through environment visible from the London Road frontage.

The relevant Elder-facing boundary is shown on the applicant's Site Layout Plan as a 1.1 m close-boarded "headlight screen", with 1.8 m fencing shown elsewhere. That is a ground-level treatment and cannot reasonably be assumed to protect elevated first-floor bedroom accommodation from the cumulative light, glow or visual presence of the wider illuminated drive-through environment.

Night-time residential impact

The amenity harm is not confined to measured brightness. Illuminated signage, digital displays, soffit and service-point lighting, together with the wider drive-through illumination, would be experienced as glow, glare, visual intrusion and continuous commercial activity close to homes.

That impact is particularly significant in this residential edge-of-settlement setting, where the existing night-time environment is characterised mainly by highway and street lighting rather than sustained illuminated commercial branding. The concern is therefore the signage's contribution to the cumulative 24-hour lighting environment, not simply any direct view of an individual fascia sign.

Wider visual amenity and dark skies

The amenity concern extends beyond the effect on individual homes. This is an edge-of-settlement approach where the character changes from Devizes towards its rural fringe, close to open countryside.

There is no comparable concentration of illuminated and digital drive-through signage in the immediate frontage context. The proposal would intensify the roadside-commercial character of this approach and erode its relative darkness and tranquillity through sustained illuminated branding and digital display lighting.

That effect should be assessed against the general characteristics and night-time amenity of the locality, as well as the impact on nearby residents.

7. Public safety at the roundabout

Sensitive highway location

The proposed signage would sit in close relationship with the A361/Horton Road roundabout and the proposed site access. This is a location where drivers must already respond to traffic entering and leaving the roundabout, vehicles slowing and turning, pedestrians and proposed crossing points, vehicles entering and leaving the site, and existing highway signs and road markings.

The Planning Practice Guidance on Advertisements recognises that advertisements in locations where drivers need to take greater care, including junctions, roundabouts and pedestrian crossings, are more likely to affect public safety. That is precisely this location.

The Planning Practice Guidance also identifies visual clutter as relevant to public safety. The issue here is not one sign in isolation, but the potential for excessive visual clutter created by illuminated building signage, PAY/COLLECT lettering, the digital booth screen, digital menu boards, the 8-metre totem, highway signs, road markings and vehicle movements being seen together at a sensitive junction.

Driver distraction and visual clutter

The Council should assess the visibility of the illuminated signs from each approach to the roundabout, their relationship with the proposed access, and whether their illumination, positioning and commercial character could distract drivers or compete with highway signing.

The assessment should also consider the cumulative effect of the signage proposed under this application together with the other illuminated and digital signs proposed across the linked applications.

Viewed together with the roundabout, speed-limit terminal, highway signs, road markings, pedestrian activity and turning traffic, the proposed illuminated and digital signage would add materially to visual load at a point where driver attention is already heavily engaged.

Digital booth screen

The digital booth screen requires particular public-safety scrutiny. Even where a digital sign is described as static, it can attract driver attention because of its luminance, contrast, commercial imagery and potential for content change. Its operating characteristics, and the controls sought, are considered in Section 10.

Speed-limit terminal and night-time conditions

This concern is heightened by the speed environment. The applicant's own Transport Assessment confirms that the national speed-limit terminal is only 86 metres north-east of the A361/Horton Road roundabout.

For drivers travelling out of Devizes, the national speed limit commences at that point; for drivers approaching from the Bishops Cannings / Swindon direction, it marks the point at which the national speed limit ends shortly before the roundabout.

The National Speed Limit terminal sign is a prominent feature of the night-time highway environment. The introduction of additional illuminated commercial signage in this location would add to the visual complexity encountered by drivers approaching and negotiating the A361/Horton Road roundabout.

Consent should not be granted unless the Council is satisfied that the proposed signage would not prejudice public safety.

Horton Road pedestrian-safety context

The public-safety concern is reinforced by the character of Horton Road itself. In commenting on the neighbouring Aldi proposal on this frontage, Bishops Cannings Parish Council recorded that Horton Road is already used by frequent buses, farm traffic and HGVs; that crossing it is difficult; and that the difficulty is made worse by vehicles overtaking stationary buses.

The Parish Council also recorded that two serious road accidents had occurred within the last five years involving cars and children crossing Horton Road. Introducing illuminated and digital signage that may draw driver attention, at a junction on a road with these recorded pedestrian-safety concerns, is a public-safety matter the Council should weigh carefully under the Advertisement Regulations.

Conflict with active-travel safety objectives

This is the same corridor that the Council's adopted Devizes Local Cycling and Walking Infrastructure Plan identifies as a priority walking route requiring improvement.

It is also a corridor affected by Local Transport Plan 4, endorsed by Full Council in March 2025, which seeks to make routes safer for active travel and adopts a Vision Zero ambition to eliminate death and serious injury on the road network.

Illuminated and digital advertisements that risk distracting drivers at this location would run counter to that adopted safety objective and weigh against the grant of advertisement consent on public-safety grounds.

8. Illumination and luminance

PLG05 compliance

The recognised technical benchmark is the Institution of Lighting Professionals' *Professional Lighting Guide PLG05: The Brightness of Illuminated Advertisements*. Its recommended maximum luminance levels depend on the environmental zone and the area of each illuminated or digital element.

The site occupies a residential edge-of-settlement location, close to open countryside.

The existing night-time environment is characterised principally by highway and street lighting rather than continuous high-brightness commercial illumination. That context may justify a lower-brightness classification than would apply to a suburban commercial frontage or urban centre.

The applicant should therefore identify and justify the environmental zone and relevant sign area for each illuminated or digital element and demonstrate compliance with the corresponding PLG05 limits. The submitted material does not presently do so.

Night-time residential impact

Compliance with a technical luminance limit would not, by itself, establish that the signage is acceptable for residential amenity. The Council must also assess its actual night-time effect during evening, night-time and early-morning hours, when background lighting is lower and residential sensitivity is greatest.

The relevant impact is cumulative. The proposed signage would be experienced alongside car-park and drive-through lighting, Customer Order Displays, internal restaurant lighting, vehicle headlights, the 8-metre totem, digital menu boards and the illuminated Play Land sign. Taken together, those elements create a risk of light intrusion, glare, visual intrusion and night-time disturbance close to homes.

Digital booth screen

The application does not clearly specify the digital booth screen's daytime and night-time luminance, dimming arrangements, operating hours, content-change interval or visibility from nearby homes, Horton Road, the A361 and the roundabout approaches. Its content, visibility and the controls sought are considered further in Section 10.

Describing the displayed content as "static" is not sufficient. A static digital image may still attract attention through brightness and contrast, while a sequence of changing static images may create additional amenity and public-safety effects during sensitive night-time periods or while drivers are negotiating the roundabout.

Required controls

If consent is granted, it should be subject to strict controls, including:

- verified maximum luminance limits for every illuminated and digital element;
- substantially lower night-time luminance limits;
- automatic dimming linked to ambient light levels;
- controlled hours of illumination;
- no illumination outside approved restaurant and drive-through trading hours;
- no illumination during late-night or early-morning hours unless expressly approved following residential-amenity and public-safety assessment;
- no flashing, animation, scrolling, video, intermittent illumination, moving content or change in light intensity;
- static content only on the digital booth screen;
- a specified minimum interval for any permitted content change on the digital booth screen;

- switch-off of the digital booth screen whenever the restaurant and drive-through are closed to customers;
- a maximum daytime luminance demonstrably compliant with PLG05 for the correct environmental zone and sign area;
- colour temperature, peak wavelength and light-spill controls consistent with the applicant's ecological lighting requirements.

Without those controls, the proposed illumination would be likely to cause unacceptable harm to residential amenity and could add to driver distraction at the A361/Horton Road roundabout.

9. Inconsistent luminance information and ecological lighting conflict

Inconsistent luminance information

The submitted documents contain unresolved luminance inconsistencies.

The PAY/COLLECT lettering is specified at 500 cd/m² in the Building Signage Elevations sign schedule, drawing 9045-SA-2029-P009, and in the PL/2026/03702 application form, but at 600 cd/m² in the submitted PAY/COLLECT drawing.

The inconsistency may also extend beyond luminance. The PL/2026/03702 application form lists illuminated signage on the north elevation, including a white internally illuminated "McDonald's" text sign and a yellow internally illuminated Golden Arch, both at 500 cd/m².

However, the Building Signage Elevations drawing, 9045-SA-2029-P009, appears not to show illuminated signage on the north elevation. If that is correct, the applicant's own documents disagree about whether illuminated signage is proposed on the elevation facing Elder and the London Road frontage homes.

This is not a minor drafting issue. The Council cannot properly assess residential amenity, visibility, light spill, glare, night-time impact or driver distraction unless the applicant has clarified exactly which elevations carry illuminated signage and has clearly specified the maximum luminance, night-time luminance, dimming arrangements, hours of illumination and operating characteristics of each illuminated and digital element.

The inconsistency is particularly important because this application forms part of a wider illuminated signage package in which other elements, including the digital menu boards, Play Land sign and 8-metre totem, are also specified at 600 cd/m².

Advertisement consent should not be granted on the basis of incomplete, inconsistent or insufficiently particularised technical information.

Applicant's own lighting evidence

The applicant's Proposed Lighting Layout, Signify DWG 01, project 501734912, and the accompanying LiAS Design Notes and Luminaire Schedule, DWG 00, contain several matters that bear directly on the amenity and public-safety assessment of the proposed illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting.

a) Environmental zone:

The LiAS Design Notes state that the scheme has been designed for an “E3/E4 Environmental Zone”. Elder and the neighbouring London Road frontage homes sit in an edge-of-settlement location, close to open countryside.

The Council should therefore confirm the correct environmental zone for this site before assessing the acceptability of the proposed illuminated and digital signage and the wider site-lighting context. If the proper zone is lower than E3/E4, the applicant’s lighting assumptions may have benchmarked the proposed lighting environment against a brightness context that is too permissive for this location.

b) Calculated light levels:

The Proposed Lighting Layout calculates the drive-through at an average of 26.96 lux and a maximum of 89.37 lux, and the car park at an average of 25.81 lux. Those are not received lux levels at Elder, but they form part of the proposed illuminated environment directly across the A361 from residential windows, including first-floor bedroom accommodation. The building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting would operate within that wider night-time lighting context.

The Proposed Lighting Layout also appears to show calculated lux contours extending towards the A361 frontage, including a 0.5 lux contour in the vicinity of Elder. Although that is a ground-level horizontal lux plot rather than a first-floor residential receptor assessment, it reinforces the need for verified sightline and lux assessment from first-floor bedroom accommodation at Elder before advertisement consent is granted.

c) Luminaire output:

The Luminaire Schedule identifies the drive-through and car-park luminaires as Luma Gen2 Medium BGP704 80 LED DM10 20KLM and DW50 20KLM fittings, each rated at 20,000 initial lumens per lamp, mounted at 6 metres, and specified at 2700 K. This appears to be the same Luma Gen2 fitting that the applicant’s ecological Lighting Review describes as providing 8,000 initial lumens. The applicant’s own lighting paperwork therefore appears to confirm the 8,000-versus-20,000-lumen inconsistency by product code.

d) No dimming:

The LiAS Design Notes state that energy consumption has been calculated with Constant Light Output enabled and “without dimming”. On the applicant’s own lighting evidence, no dimming is proposed for the wider site-lighting scheme within which the illuminated and digital signage would sit. The signage documents also fail to identify enforceable night-time dimming controls for the illuminated building signage, PAY/COLLECT lettering, digital booth screen or soffit lighting.

e) Colour temperature and preliminary status:

The scheme is specified at 2700 K, which sits at the top of the Preliminary Ecological Appraisal’s stated preference for a warm-white spectrum “ideally below 2700 K”. The Proposed Lighting Layout is marked “PROPOSAL (NOT FOR CONSTRUCTION)”, records that Signify has not visited the site, that luminaire locations are indicative, and that the design does not account for the effect of obstructions such as trees. The lighting evidence is therefore preliminary and unverified.

Ecological lighting conflict

The applicant's own Preliminary Ecological Appraisal requires strict lighting controls, including a warm white spectrum ideally below 2,700 Kelvin, luminaires with peak wavelengths above 550 nm, no direct illumination of boundary habitats, retained trees or bat-box locations, ecologist-reviewed lux scatter plots before approval, and protection of the eastern boundary from illumination.

The submitted signage documents do not demonstrate compliance with those requirements. The relationship between the illuminated fascia signage, PAY/COLLECT lettering, digital booth screen, soffit lighting, site lighting, boundary habitats, retained trees and any bat-box locations has not been clearly assessed through a signage-specific lux spill plan.

The yellow soffit lighting is of particular concern because its spill, orientation, colour temperature, luminance and relationship to boundary habitats have not been adequately specified. The Council cannot safely assume that it would be compatible with the ecological lighting mitigation required by the applicant's own Preliminary Ecological Appraisal.

Relevance to this advertisement application

Ecological impact is principally a determining consideration for the main planning application rather than for this advertisement consent. I do not ask the Council to determine the ecological acceptability of the wider development under this application.

However, the ecological lighting conflict is relevant to this advertisement application in two ways.

First, it reinforces the need for strict control over luminance, colour temperature, light spill, dimming and hours of illumination for the illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting.

Secondly, it shows that the submitted lighting information is not yet sufficiently particularised or internally consistent for the Council to assess amenity and public safety with confidence.

Required information before consent

Before granting advertisement consent, the Council should require a consolidated, verified signage and lighting schedule for all illuminated and digital elements proposed under PL/2026/03702, PL/2026/03737 and PL/2026/03738.

That schedule should confirm the siting, orientation, sign area, maximum luminance, night-time luminance, dimming arrangements, colour temperature, peak wavelength, operating hours and visibility of each illuminated element.

For PL/2026/03702 specifically, it should also confirm:

- whether illuminated signage is proposed on the north elevation;
- the correct luminance figure for the PAY/COLLECT lettering;
- the daytime and night-time luminance of the digital booth screen;
- whether the digital booth screen would display fixed or changing content;
- the minimum interval for any permitted content change;

- whether the digital booth screen would be visible from Elder, neighbouring homes, Horton Road, the A361 or the roundabout approaches;
- the colour temperature, luminance, orientation and spill of the yellow soffit lighting.

The Council should also require a signage-specific lux spill plan showing effects on residential receptors, the A361/Horton Road roundabout, boundary habitats, retained trees and any bat-box locations. That material should be reviewed by a suitably qualified ecologist before consent is granted.

Until that information is provided, the Council cannot safely conclude that the proposed signage would avoid unacceptable harm to residential amenity or public safety. The applicant's ecological lighting requirements reinforce the need for reliable controls over illumination, light spill, colour temperature and operating hours.

10. Digital booth screen

The digital booth screen may be smaller than the larger site signage, but it remains a digital illuminated element within the drive-through operation and must be assessed as such.

The submitted documents do not clearly specify whether the image would be static or changeable; whether animation, movement, flashing, scrolling or intermittent illumination is proposed; how often content could change; whether the screen would operate continuously overnight; its daytime and night-time luminance; whether it would dim automatically in response to ambient light; whether it would be visible from Horton Road, the roundabout or nearby homes; or whether it would be switched off outside approved restaurant and drive-through trading hours.

Digital signage close to a roundabout and to homes requires careful assessment because of its luminance, contrast, commercial imagery and potential to attract attention. Advertisement consent should not be granted unless the Council is satisfied that the digital booth screen would not cause unacceptable light intrusion, glare, visual intrusion, driver distraction or visual clutter.

If consent is granted, the screen should be subject to enforceable conditions requiring static content only, no animation or flashing, a specified minimum interval between any permitted content changes, automatic dimming, controlled hours of operation, and switch-off outside approved restaurant and drive-through trading hours.

11. Cumulative impact across the signage applications and the wider area

Across PL/2026/03702, PL/2026/03737 and PL/2026/03738, the proposed signage package would include internally illuminated building signage and Golden Arches, PAY/COLLECT drive-through lettering, the digital booth screen, soffit and service-point lighting, digital menu boards, an illuminated Play Land sign, a freestanding banner unit, the 8-metre internally illuminated totem and numerous operational signs.

The signage proposed under this application should therefore not be assessed as isolated building signage. It would form part of a heavily branded and illuminated roadside environment, visually intrusive to nearby residents and capable of adding to driver distraction at the A361/Horton Road roundabout.

Consent for PL/2026/03702 should not be granted unless the Council has assessed the cumulative advertisement impact across all three signage applications and the main 24-hour drive-through proposal.

Wider corridor context

I am also aware of nearby committed, live and emerging development around the same A361/Horton Road corridor:

- the committed business park nearby to the east, application PL/2022/00977, appeal reference APP/Y3940/W/23/3328710, allowed at appeal in February 2024;
- the live hybrid Aldi / Bike School application, PL/2026/01361, on land fronting London Road and Horton Road, comprising a Class E(a) food store of approximately 1,787 sqm and an outline component seeking permission for a drive-through unit of approximately 205 sqm with EV charging hub;
- emerging pre-application proposals by Robert Cort Properties at Moonraker Park, off Horton Road, including a Tesco food store, DIY superstore, small commercial units and Starbucks, the subject of public consultation in July 2026.

The proposed Aldi food store hours are 07:00–23:00 Monday to Friday, 08:00–23:00 on Saturday, and 09:00–17:00 on Sundays and Bank Holidays. The hours for the outline drive-through unit are stated as unknown.

Why this matters for this advertisement application

I do not object to those separate schemes in this representation. I raise them only insofar as they are relevant to the advertisement-control tests of amenity and public safety.

The committed business park forms part of the baseline. The live Aldi / Bike School application and emerging Moonraker Park proposals are also relevant to the Council's understanding of the changing corridor context. Together, those schemes could add further illuminated signage, digital displays, vehicle activity, evening lighting and visual complexity around the same junction.

To the extent that the applicant's amenity or public-safety assessment assumes a static, darker or less commercially intensive baseline, the Council should test whether that baseline remains realistic.

The issue is not whether the other schemes are acceptable in their own right, but whether the internally illuminated and digital signage proposed under PL/2026/03702 has been properly assessed against the cumulative night-time lighting, visual-amenity and driver-distraction context of this corridor.

12. Consent period and removal

Consent period

The standard express advertisement consent period is five years where no other period is specified. In this sensitive location, there is no justification for any longer period. If consent were granted, the proximity of the proposed illuminated and digital signage to residential property, and its relationship with the A361/Horton Road roundabout, would justify either the standard five-year period or a shorter period, together with strict controls.

Class 14 deemed consent

The Council should also take account of Class 14 of Schedule 3 to the 2007 Regulations. Once express consent expires, an advertisement may normally continue

to be displayed under deemed consent unless a specific removal condition has been imposed.

That matters here because the proposed signage is not low-level or incidental. It includes internally illuminated building signage, PAY/COLLECT lettering, a digital booth screen and soffit lighting, all forming part of a wider illuminated drive-through environment close to homes and beside a sensitive roundabout.

If consent were granted, the Council should impose an express condition requiring the signage and associated illumination to be removed, or permanently decommissioned, at the end of the express consent period unless further express consent has first been granted.

Relationship to the associated restaurant

The signage is proposed solely to serve the associated McDonald's restaurant and drive-through. If that restaurant is not implemented, or if it permanently ceases to operate, there would be no justification for retaining illuminated or digital drive-through signage in this location.

Any consent should therefore require the signage to be removed, or the illumination permanently disabled, if the associated restaurant and drive-through are not implemented or permanently cease trading. In addition, all illumination should be switched off whenever the restaurant and drive-through are closed to customers.

13. Relationship with the main application

Advertisement effects depend on the main use

Although need is not a separate advertisement-control test, the relationship between this application and the main planning application is relevant. The amenity and public-safety effects of the proposed illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting would arise solely because they are intended to serve the proposed McDonald's restaurant and drive-through under PL/2026/03683. Approval of PL/2026/03683 would not determine this application; the proposed advertisements must still satisfy the statutory tests of amenity and public safety.

If that main use is refused, not implemented, or later ceases to operate, the signage would no longer serve an approved operational use on the site. It would instead leave illuminated and digital commercial signage close to homes and beside the A361/Horton Road roundabout, with continuing potential for visual intrusion, light spill, glare and driver distraction.

Need for linkage condition

Consent should therefore be refused unless the Council is satisfied that the advertisements meet the statutory tests of amenity and public safety. If consent is granted, it should also be expressly linked to the lawful implementation and continuing operation of the associated restaurant and drive-through. If advertisement consent is granted, it should be expressly conditioned so that:

- no advertisement may be displayed unless and until the associated restaurant and drive-through use is lawfully implemented;
- illumination must be switched off whenever the restaurant and drive-through are closed to customers;

- the digital booth screen must be switched off whenever the restaurant and drive-through are closed to customers;
- the signs, associated illumination and any supporting structures must be removed, or permanently decommissioned, if the restaurant and drive-through are not implemented or permanently cease trading.

Recent comparable refusal

This is not a purely theoretical concern. Wiltshire Council recently refused a comparable McDonald's drive-through proposal beside the A361 roundabout at Paxcroft / Hilperton, application PL/2023/05469. That proposal also involved a freestanding restaurant with drive-through facility, car parking, landscaping, Customer Order Displays and external play provision.

I do not suggest that the Hilperton decision determines this advertisement application, nor that its refusal reasons were advertisement grounds. The narrower point is that the restaurant use which this signage is intended to serve is not a foregone conclusion.

It would therefore be premature to grant consent for illuminated and digital signage unless its display, illumination and retention are strictly tied to the lawful implementation and continuing operation of the associated restaurant and drive-through.

14. Requested outcome

Further information before determination

Before granting advertisement consent, the Council should require a consolidated signage and lighting schedule for PL/2026/03702 and the linked signage applications. That schedule should confirm the siting, orientation, sign area, maximum luminance, night-time luminance, dimming arrangements, colour temperature, operating hours and visibility of each illuminated or digital element.

For this application specifically, the Council should require clear confirmation of:

- the maximum and night-time luminance of each fascia sign;
- the correct luminance figure for the PAY/COLLECT lettering;
- the luminance, operating hours, dimming arrangements and content-control arrangements for the digital booth screen;
- the colour temperature and peak wavelength of all illuminated elements;
- the extent of light spill onto nearby homes, the A361/Horton Road roundabout, boundary habitats, retained trees and any bat-box locations;
- whether the signage would be visible from Elder, including the first-floor bedroom and adjoining en-suite window facing the site, neighbouring London Road frontage homes, Horton Road, the A361 approaches and the roundabout;
- how the signage would be controlled outside restaurant and drive-through trading hours; and
- verified sightline sections and, where relevant, lux calculations for first-floor bedroom accommodation at Elder and the neighbouring London Road frontage homes.

The Council should not grant consent unless it is satisfied that the signage would not cause unacceptable light intrusion, glare, visual intrusion, driver distraction or excessive visual clutter.

Primary request

I respectfully request that Wiltshire Council refuses advertisement consent for PL/2026/03702.

Fallback conditions if consent is granted

If the Council is minded to grant advertisement consent, any consent should be subject to strict, enforceable conditions requiring:

1. No advertisement approved under PL/2026/03702 to be displayed unless and until the associated restaurant and drive-through use under PL/2026/03683 has been lawfully implemented.
2. No illuminated or digital signage approved under PL/2026/03702, including the digital booth screen and soffit lighting, may operate outside the approved trading hours of the associated restaurant and drive-through, and all such illumination must be switched off whenever that use is closed to customers.
3. Before installation of any illuminated or digital sign, the applicant must submit and obtain written approval for a consolidated signage and lighting schedule identifying the precise siting, orientation, sign area, maximum luminance, night-time luminance, dimming arrangements, colour temperature, peak wavelength, operating hours and visibility of each illuminated or digital element.
4. The Council must first confirm the correct environmental zone for the site, and all maximum luminance limits must then be assessed against PLG05 for that environmental zone and the relevant sign area.
5. The inconsistency between the Building Signage Elevations sign schedule, drawing 9045-SA-2029-P009, the PL/2026/03702 application form and the submitted PAY/COLLECT drawing must be resolved before consent is implemented.
6. No PAY/COLLECT lettering may be installed or illuminated until its approved maximum luminance, night-time luminance, dimming arrangements and hours of operation have been confirmed in writing by the Council.
7. No illuminated signage may be installed on the north elevation unless it has been expressly approved in writing following assessment of its visibility from Elder and the neighbouring London Road frontage homes.
8. Substantially lower night-time luminance limits must be imposed for every illuminated and digital element.
9. All illuminated and digital signage must include automatic dimming linked to ambient light levels.
10. No illuminated or digital sign may flash, scroll, animate, display video, display moving content, operate intermittently, or change light intensity other than through approved automatic dimming.
11. The digital booth screen must display static content only.

12. A minimum interval must be specified for any permitted content change on the digital booth screen.
13. No content change on the digital booth screen may be visible from Horton Road, the A361, the A361/Horton Road roundabout approaches, the proposed site access or nearby pedestrian crossing points unless expressly approved by the Council following public-safety assessment.
14. Before installation of the digital booth screen, the applicant must submit verified sightline drawings or visualisations showing whether it would be visible from Elder, the neighbouring London Road frontage homes, Horton Road, the A361, the roundabout approaches, the proposed site access and nearby pedestrian crossing points.
15. No digital booth screen may be operated during evening, night-time or early-morning hours unless the Council is satisfied, following residential-amenity and public-safety assessment, that it would not cause unacceptable light intrusion, glare, visual intrusion or driver distraction.
16. The yellow soffit lighting must not be installed or operated unless its precise siting, orientation, luminance, colour temperature, peak wavelength, light spill and hours of operation have first been approved in writing by the Council.
17. No illuminated or digital sign may cause glare, light spill, visual intrusion, excessive brightness or driver distraction.
18. No sign may resemble, obscure, compete with or distract from public highway signage.
19. Before installation of any illuminated or digital sign, the applicant must submit and obtain approval for a signage-specific lux spill plan showing effects on residential receptors, the A361/Horton Road roundabout, boundary habitats, retained trees and any bat-box locations.
20. The signage-specific lux spill plan must be reviewed by a suitably qualified ecologist before any illuminated or digital sign is installed.
21. All illuminated and digital signage must comply with the applicant's ecological lighting requirements insofar as they relate to illumination control, including colour temperature, peak wavelength, light spill and avoidance of direct illumination of boundary habitats, retained trees and any bat-box locations.
22. Lighting colour temperature must not exceed 2,700 Kelvin, and peak wavelengths must be above 550 nm, unless otherwise agreed in writing following ecological assessment.
23. All signage, digital display equipment, illumination, electrical infrastructure and supporting structures approved under PL/2026/03702 must be removed or permanently decommissioned if the associated restaurant and drive-through are not implemented or permanently cease trading.
24. All signage approved under this consent must be removed at the end of the express advertisement consent period unless further express advertisement consent has first been granted.

These conditions are a fallback only. They should not be read as diluting the primary objection or as acceptance that illuminated and digital signage of this character can be made acceptable in this location.

15. Conclusion

PL/2026/03702 is not a minor or isolated signage proposal. It forms part of a wider package of illuminated and digital signage serving a proposed 24-hour McDonald's drive-through immediately beside the A361/Horton Road roundabout and close to homes, including Elder and the neighbouring properties along the London Road frontage.

The proposed internally illuminated building signage, PAY/COLLECT drive-through lettering, digital booth screen and soffit lighting would contribute to a cumulative illuminated drive-through environment. In this location, that would cause unacceptable harm to residential amenity through visual intrusion, light spill, glare and night-time impact.

The public-safety concern is also material. The signage would be viewed close to a sensitive roundabout, the proposed site access, pedestrian movements, highway signs, road markings and the speed-limit terminal. It should not be approved unless the Council is satisfied that it would not distract drivers, add excessive visual clutter or compete with highway signage.

The submitted documents do not provide a clear and consistent basis for approval. The PAY/COLLECT lettering is specified at different luminance levels in different documents; the application does not demonstrate compliance with PLG05 for the correct environmental zone; the digital booth screen is insufficiently specified; and the relationship between the proposed signage lighting and the applicant's own ecological lighting requirements has not been properly resolved.

For those reasons, assessed strictly on the statutory advertisement grounds of amenity and public safety, I ask Wiltshire Council to refuse advertisement consent for PL/2026/03702.

Given the cumulative residential-amenity and public-safety issues, and the relationship between this application and the linked main and advertisement applications, I respectfully request that PL/2026/03702 be determined by Planning Committee rather than under delegated powers, and considered alongside the related applications.