

Objection to Advertisement Application PL/2026/03738

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

Proposed site signage, including digital menu boards, banner unit, Play Land sign and operational signage

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 signage package 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/2026/03738 and ask Wiltshire Council to refuse advertisement consent.

This is not a minor site-signage application. It seeks consent for a substantial package of digital, illuminated, promotional and operational signage, including one single digital menu board, three double digital menu boards, an internally illuminated Play Land sign, a double-sided banner unit and 17 DOT signs.

The signage would form part of a proposed 24-hour McDonald's drive-through environment and should be assessed cumulatively with PL/2026/03683, PL/2026/03702 and PL/2026/03737. (Sections 1, 5 and 12.)

Elder lies directly opposite the proposed site on the London Road frontage and forms part of a short run of homes with an open, unscreened relationship to the application 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 signage environment. (Sections 3 and 6.)

The approximate distances from the nearest visible part of Elder's residential façade demonstrate that the proposed signage is not remote from residential receptors:

Element and application	Approximate distance from Elder's façade	Illumination
8-metre totem (PL/2026/03737 — linked context)	25–30 metres	Internally illuminated; specified at up to 600 cd/m ² .
Double-sided banner unit (PL/2026/03738)	30–35 metres	Understood not to be internally illuminated; the applicant should confirm.
Play Space and Play Land sign (PL/2026/03738)	50–55 metres	Internally illuminated; specified at up to 600 cd/m ² .
Digital menu boards (PL/2026/03738)	60–70 metres	Digital displays; specified at up to 600 cd/m ² .
Customer Order Displays and drive-through canopies (PL/2026/03683 — linked operational context)	70–85 metres	Illuminated "ORDER HERE" lettering and lit canopy.

Note: distances are approximate and scaled from the applicant's drawings, not surveyed dimensions. These relationships are illustrated in Figures 1 to 3 and addressed in Sections 3, 6, 10 and 11.

The principal amenity harm is the cumulative effect of digital menu boards, the illuminated Play Land sign, the banner unit, operational signage, Customer Order

Displays, site lighting, vehicle headlights, the illuminated building signage proposed under PL/2026/03702 and the 8-metre totem proposed under PL/2026/03737.

Under the 24-hour proposal in PL/2026/03683, those effects could extend into evening, night-time and early-morning hours, when residential sensitivity is greatest. (Sections 6, 8, 10, 11 and 12.)

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, 6 and 8.)

The Play Land sign requires particular scrutiny. It is internally illuminated, stated at a maximum luminance of 600 cd/m², and appears to sit within the line of view from the first-floor bedroom/en-suite at Elder.

The relevant Elder-facing boundary is shown on the applicant's Site Layout Plan as a 1.1 m close-boarded "headlight screen", which cannot reasonably be assumed to protect elevated residential windows from the cumulative illuminated signage environment. Figure 3 illustrates that relationship.

The digital menu boards are also sensitive elements. They are illuminated commercial display screens integral to the proposed drive-through operation. Even if described as static, they may attract attention because of brightness, contrast, commercial imagery and potential content change.

The application does not provide adequate verified evidence on visibility, night-time luminance, dimming, content controls, image-change intervals or effect on nearby homes and road users. (Sections 7, 8, 9 and 10.)

There is also a public-safety objection. The signage would be viewed close to the A361/Horton Road roundabout, the proposed site access, pedestrian crossing points, highway signage and the national speed-limit terminal. Drivers would be required to process digital displays, operational instructions, promotional signage, illuminated branding, vehicle movements and pedestrian activity in the same visual environment.

The Council should not grant consent unless satisfied that the signage would not distract drivers, create excessive visual clutter or compete with highway signage. (Section 7.)

The applicant's own lighting material raises further concerns. The LiAS Design Notes refer to an E3/E4 Environmental Zone, despite the site's edge-of-settlement location close to open countryside.

The Proposed Lighting Layout also identifies drive-through lighting with an average of 26.96 lux and maximum of 89.37 lux, car-park lighting averaging 25.81 lux, 20,000-lumen fittings, no dimming in the wider site-lighting calculation, and a preliminary "PROPOSAL (NOT FOR CONSTRUCTION)" status.

Those matters undermine confidence in the assessment of the cumulative night-time lighting environment. (Sections 8 and 9.)

The submitted material also contains unresolved inconsistencies and omissions. Across the linked applications there is no single consolidated luminance schedule. The PAY/COLLECT lettering under PL/2026/03702 is specified at both 500 cd/m² and 600 cd/m², while the digital menu boards, Play Land sign and 8-metre totem are each specified at 600 cd/m².

Nor does the application demonstrate compliance with the Institution of Lighting Professionals' Professional Lighting Guide PLG05 for the correct environmental zone. The applicant has not provided sufficient verified information on night-time luminance, dimming, colour temperature, peak wavelength, light spill, sightlines, operating hours or ecological lighting compatibility. (Sections 8 and 9.)

The banner unit and operational signs should not be dismissed as minor. Together with the digital and illuminated elements, they would add to visual clutter, customer-instruction intensity and the commercialised character of the London Road frontage. (Sections 5 and 11.)

For those reasons, and assessed strictly on the statutory advertisement grounds of amenity and public safety, 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 verified sightline drawings, consolidated signage and lighting schedule, signage-specific lux spill plan, confirmation of the correct environmental zone and other information identified in Section 15 have been provided, published and, where appropriate, subject to consultation.

Relationship of the PL/2026/03738 signage package to Elder and the A361/Horton Road roundabout

Important note

These figures have been prepared by the objector from the applicant's submitted plans and drawings. They are illustrative only and are not measured surveys or scale drawings. Distances are approximate, derived from scaled PDF drawings, and are included solely to assist the Council's assessment of residential amenity, public safety and the cumulative relationship between the linked applications.

Elements from the linked applications (PL/2026/03737 and PL/2026/03702) are shown for contextual purposes only and do not form part of application PL/2026/03738.

Proposed PL/2026/03738 site signage in relation to Elder

with linked applications PL/2026/03683, 03702 and 03737 — Cannings Hill Garage, Devizes

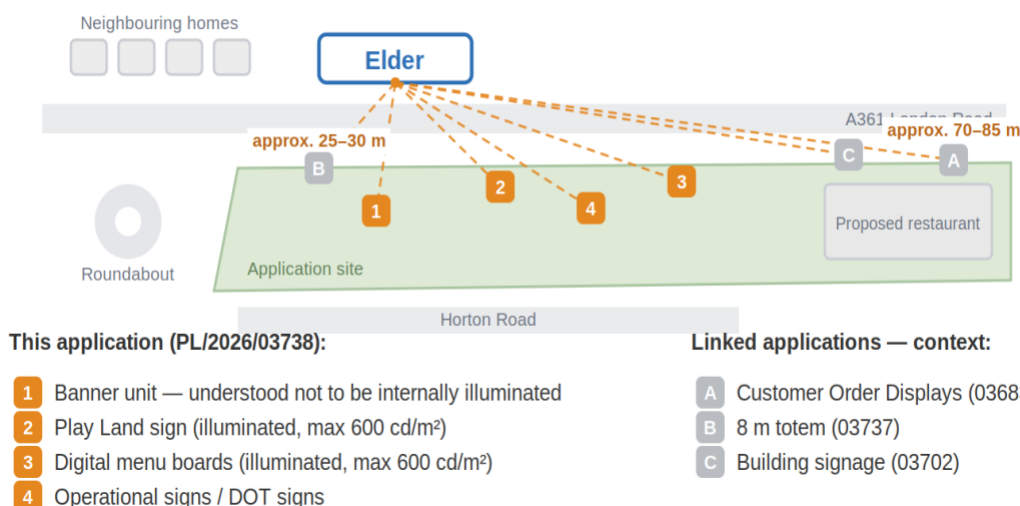
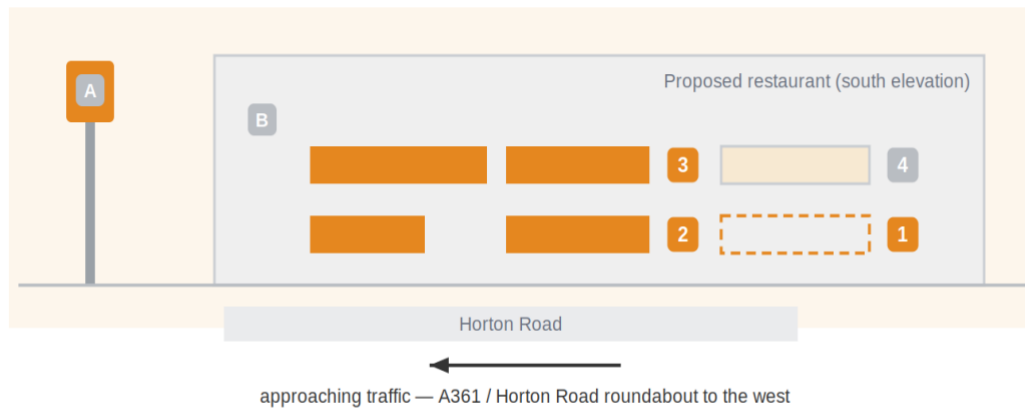


Figure 1 — Plan of the proposed PL/2026/03738 site signage in relation to Elder and the A361/Horton Road roundabout.

Combined site signage on the roundabout approach

Application PL/2026/03738, with linked applications PL/2026/03683, 03702 and 03737



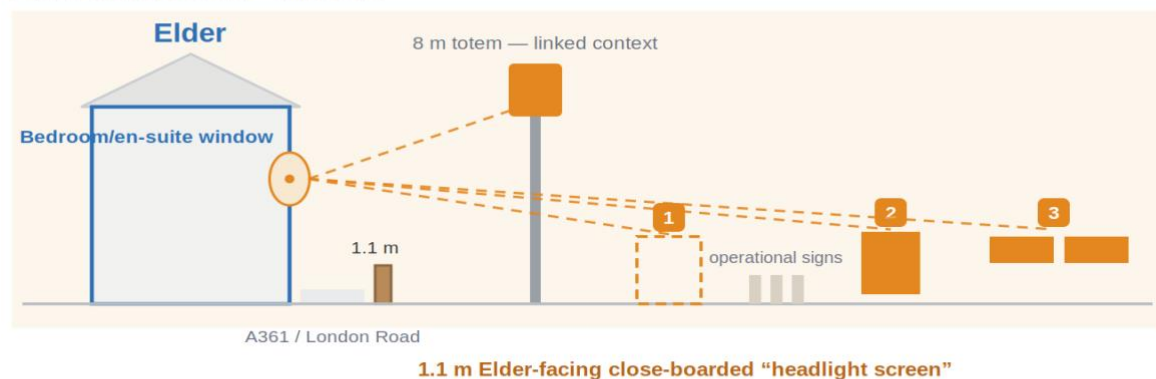
Principal elements shown (PL/2026/03738 subject; linked applications as context):

- | | |
|---|-------------------------------------|
| 1 Banner unit — understood not to be internally illuminated | 4 Customer Order Displays (context) |
| 2 Play Land sign (illuminated) | A 8 m totem (PL/2026/03737) |
| 3 Digital menu boards (illuminated) | B Building signage (PL/2026/03702) |

Figure 2 — Indicative frontage elevation on the roundabout approach, showing the proposed PL/2026/03738 site signage within the wider illuminated drive-through environment, with the 8 m totem as the tallest element. Heights are taken from the applicant's schedules; horizontal distances are compressed.

PL/2026/03738 site signage — first-floor bedroom/en-suite relationship

Application PL/2026/03738 — Cannings Hill Garage, Devizes
Objector's indicative section — not to scale.



- | |
|--|
| 1 banner — understood not to be internally illuminated |
| 2 Play Land sign — max. 600 cd/m ² |
| 3 digital menu boards — max. 600 cd/m ² |

Sight lines from the first-floor bedroom/en-suite window pass over the 1.1 m ground-level screen.
Linked elements shown for cumulative context only.

Figure 3 — Indicative composite section showing the relationship between the first-floor bedroom/en-suite window at Elder, the 1.1 m Elder-facing close-boarded "headlight screen", and the principal PL/2026/03738 signage elements. Heights and positions are illustrative.

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 15 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 signage package, digital menu boards, an internally illuminated Play Land sign, a double-sided banner unit and numerous operational signs, would introduce cumulative illuminated and digital signage close to a first-floor bedroom at Elder.

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 light intrusion, glow or the visual presence of the illuminated signage package. (Sections 3, 5, 6 and 8.)

2. The signage package 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 building signage of PL/2026/03702 and the 8-metre totem of PL/2026/03737. Its impact should therefore be assessed cumulatively, not as a standalone advertisement. (Sections 1, 6 and 12.)

3. Inadequate and inconsistent lighting and signage evidence.

The submitted material does not provide a single consolidated, verified luminance schedule for the full signage package. Digital menu boards and the Play Land sign are specified at 600 cd/m², while linked documents contain unresolved inconsistencies, including the PAY/COLLECT 500 / 600 cd/m² discrepancy.

The wider lighting material refers to an E3/E4 Environmental Zone, 20,000-lumen fittings mounted at 6 metres, no dimming in the wider site-lighting calculation, and a preliminary "PROPOSAL (NOT FOR CONSTRUCTION)" status. (Sections 8 and 9.)

4. Public-safety concern at the A361/Horton Road roundabout.

The package would add digital displays and operational signs close to a sensitive highway environment where drivers must already respond to the roundabout, the speed-limit transition, highway signs, the proposed site access and pedestrian crossing points. The resulting visual clutter and attention capture may compete for driver attention where public safety requires particular care. (Section 7.)

1. Linked applications

This application should not be considered in isolation. It is directly connected to:

- PL/2026/03683 — the main application for a 24-hour McDonald's restaurant/takeaway with drive-through facility and Customer Order Displays;
- PL/2026/03702 — illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting;
- PL/2026/03737 — the proposed 8-metre internally illuminated freestanding totem sign.

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 site signage, including digital menu boards, the banner unit, the Play Land sign and operational signage, on residential amenity, including visual intrusion, light spill, glare, night-time impact and cumulative visual clutter.

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, a point 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 scale, number, illumination, digital content, positioning and cumulative impact of the proposed site-

signage package 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 approximate distances from the nearest visible part of Elder's residential façade to key signage and operational elements are:

- double-sided banner unit: approximately 30–35 metres;
- Play Space and Play Land sign: approximately 50–55 metres;
- digital menu boards: approximately 60–70 metres;
- Customer Order Displays and drive-through canopies: approximately 70–85 metres.

These are approximate measurements, not surveyed dimensions, and the applicant should be required to confirm the precise separation distances, siting, orientation 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.

These distances are particularly material because the affected accommodation at Elder includes a first-floor bedroom, with an adjoining en-suite window facing the application site.

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 digital menu boards, illuminated Play Land sign and associated site 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 application seeks consent for a substantial site-wide signage package comprising:

- one single and three double digital menu boards;
- one double-sided banner unit;
- one internally illuminated Play Land sign; and
- 17 operational or “DOT” signs, including parking, litter, pedestrian, give-way, speed-limit and directional signs.

The digital menu boards and Play Land sign are internally illuminated and each is specified at a maximum luminance of 600 cd/m².

Taken together, this is not modest site identification. It is a managed drive-through signage environment combining illuminated digital displays, promotional signage and extensive customer, pedestrian and vehicle instructions. Its cumulative visual effect would be materially greater than that of ordinary restaurant signage.

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

Cumulative signage and lighting context

The proposed signage would not be experienced as a set of isolated site signs. It would form part of the wider visual and illuminated environment of a proposed 24-hour drive-through restaurant, including digital menu boards, the illuminated Play Land sign, the double-sided banner unit, operational signs, Customer Order Displays, car-park lighting, drive-through lighting, internal restaurant lighting, vehicle headlights, the illuminated building signage proposed under PL/2026/03702 and the 8-metre illuminated totem proposed under PL/2026/03737.

The particular harm in this application is not limited to the brightness or visibility of any single sign. It is the cumulative effect of a site-wide package of digital, illuminated and operational signage distributed across a compact drive-through site directly opposite residential properties.

Under the 24-hour proposal in PL/2026/03683, those effects could extend into the evening, night-time and early-morning hours, when residential sensitivity is greatest and when the area would otherwise be quieter and darker.

The Council should therefore assess the proposed site signage as part of the wider night-time drive-through environment, rather than treating the digital menu boards, Play Land sign, banner unit and operational signs as separate and minor advertisement elements.

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 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 signage and lighting environment.

That matters for this application. Even if some of the signage elements would be partly screened by the restaurant building, the signage package as a whole would still contribute to the illuminated and commercialised character of the proposed 24-hour drive-through use.

The relevant residential experience would be of the site as a whole: digital displays, operational signage, illuminated features, vehicle activity and lighting seen together across the A361.

First-floor bedroom accommodation

The amenity harm is most acute for a first-floor bedroom at Elder, which 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.

Because the bedroom and en-suite are at first-floor level, they sit above the proposed ground-level boundary treatment. The relevant boundary facing Elder 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.

A 1.1 m screen is a ground-level treatment and cannot reasonably be assumed to protect elevated residential windows from the cumulative light, glow or visual presence of digital menu boards, the Play Land sign, site lighting, vehicle headlights and linked illuminated signage.

Night-time residential impact

The amenity harm is not confined to direct glare from a single illuminated sign. Digital and illuminated site signage would be experienced as brightness, glow, contrast, visual movement or content change, and commercial visual activity close to homes.

The proximity identified in Section 3 reinforces the need to assess the signage package from the perspective of residents experiencing it during evening, night-time and early-morning periods.

The fact that some operational signs may not be internally illuminated does not remove the amenity concern. Non-illuminated signs would still add to daytime and evening visual clutter, and at night would be seen within the wider illuminated environment created by the restaurant, car park, drive-through lane, digital menu boards, Play Land sign, Customer Order Displays, building signage, totem and vehicle headlights.

Nor should the Council assume that boundary fencing or landscaping would remove the harm. Fencing and planting may screen some lower-level views over time, but they would not eliminate the cumulative perception of an illuminated, active and commercially branded drive-through environment opposite homes, particularly from upper-floor windows and during darker hours.

Residential character, visual intrusion and dark skies

This is an edge-of-settlement approach where the character changes from Devizes towards its rural fringe, close to open countryside. Its night-time character is relatively subdued, with lighting derived principally from the highway and streetlights rather than sustained illuminated commercial branding.

The proposed package would introduce digital displays, illuminated branding, promotional signage and extensive operational signage more characteristic of a highway-oriented drive-through than of a restrained frontage opposite homes. Its cumulative effect would intensify the roadside-commercial character of the locality and erode its relative darkness and tranquillity.

The issue is not signage in principle, but whether signage of this scale and character is acceptable in this particular residential, rural-edge and roundabout context. In my submission, it would materially increase visual intrusion, night-time brightness and commercialisation, harming both nearby residents and the general amenity characteristics of the locality.

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, existing highway signs, road markings and the speed-limit terminal.

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 cumulative visual load created by digital menu boards, operational signs, the Play Land sign, the banner unit, the illuminated building signage proposed under PL/2026/03702, the 8-metre totem proposed under PL/2026/03737, highway signs, road markings, vehicle movements and pedestrian activity being seen together at a sensitive junction.

Driver distraction and visual clutter

The Council should assess the visibility of the proposed signage from each approach to the A361/Horton Road roundabout, from Horton Road, from the A361, from the proposed site access and from any nearby pedestrian crossing points.

The concern is not simply the brightness of any individual sign. The proposed signage would form part of a busy visual environment in which drivers may be required to process commercial signage, digital displays, operational instructions, highway signage, pedestrian movements, vehicles braking and accelerating, and vehicles entering or leaving the site.

That visual load would be increased further at night, when the digital menu boards, illuminated Play Land sign, Customer Order Displays, car-park lighting, drive-through lighting, building signage, the 8-metre totem, vehicle headlights and existing highway lighting would all contribute to the same visual environment.

Advertisement consent should not be granted unless the Council is satisfied that the signage would not distract drivers, create excessive visual clutter, compete with highway signage or otherwise prejudice public safety.

Digital displays and attention capture

The digital menu boards require particular scrutiny. Even where digital signs are described as static, they can still attract driver attention because of their brightness, contrast, commercial imagery and potential for content change.

The Council should therefore assess whether the digital menu boards would be visible from Horton Road, the A361, the roundabout approaches, the proposed site access or nearby pedestrian crossing points.

If they would be visible from any of those locations, the Council should assess whether their luminance, contrast, content, orientation and image-change frequency could distract drivers or add to visual clutter.

A general statement that the displays are static is not sufficient. A static digital display may still be visually prominent, and a changeable static-image display may still attract attention if images alter while drivers are negotiating the roundabout, entering the site, leaving the site or responding to pedestrians.

The applicant should therefore be required to provide sightline drawings or verified visualisations showing whether the digital menu boards would be visible from Horton Road, the A361, the roundabout approaches and the proposed site access.

Operational signage and highway-sign confusion

The proposed package also includes operational signage associated with pedestrian movement, parking, ordering, give-way instructions, speed control and directional information within the site.

Some operational signage may be necessary for site management. However, its presence reinforces the complexity of the proposed drive-through environment. A site requiring this level of internal instruction and traffic management would introduce a significant amount of visual information close to an already sensitive public highway junction.

The Council should consider whether any operational sign could resemble, obscure, compete with or distract from public highway signage. This is particularly important where internal traffic-management signs, commercial signs and public highway signs would be seen together close to the roundabout and site access.

The Council should also consider whether illumination or digital display brightness could cause glare or interfere with visibility.

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 shortly after the roundabout. 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 is already a prominent feature of the highway environment. At night, the proposed digital menu boards, illuminated Play Land sign, linked building signage, 8-metre totem, car-park lighting, drive-through lighting and vehicle headlights would add further visual complexity.

The Council should therefore assess public safety under both daytime and night-time conditions. A signage package that appears tolerable in daylight may have a materially different effect in darkness, especially where digital and illuminated elements operate close to a roundabout.

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 a package of digital, illuminated and operational 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.

Digital, illuminated and operational advertisements that risk distracting drivers or increasing visual clutter at this location would run counter to those adopted safety objectives and weigh against the grant of advertisement consent on public-safety grounds.

Required assessment

Before granting consent, the Council should require:

- verified sightline drawings or visualisations showing what would be visible from Horton Road, the A361, the roundabout approaches, the proposed site access and nearby pedestrian crossing points;
- confirmation of the orientation, luminance, night-time dimming and content controls for each digital or illuminated sign;
- confirmation that no digital display would be visible in a way that could distract drivers approaching, entering or leaving the roundabout;
- assessment of the cumulative visual effect of this signage with PL/2026/03702 and PL/2026/03737;
- consultation with the Highway Authority on driver distraction, visual clutter and any risk of confusion with highway signage.

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

8. Illumination and luminance

PLG05 compliance

The digital menu boards and internally illuminated Play Land sign are each specified at a maximum luminance of 600 cd/m². The relevant technical benchmark is the

Institution of Lighting Professionals' *Professional Lighting Guide PLG05: The Brightness of Illuminated Advertisements*, under which recommended maximum luminance depends 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. Its existing night-time environment is characterised principally by highway and street lighting rather than sustained high-brightness commercial illumination.

The applicant should therefore identify and justify the environmental zone and relevant sign area for each element, and demonstrate that the proposed 600 cd/m² maximum complies with the corresponding PLG05 limits. The submitted material does not presently do so.

Night-time residential impact

PLG05 compliance would not, by itself, establish that the signage is acceptable for residential amenity. The Council must also assess its actual effect during evening, night-time and early-morning hours, when background lighting is lower and residential sensitivity is greatest.

The proposed signs would be experienced cumulatively with the wider drive-through lighting environment, creating a risk of light intrusion, glare, visual prominence and night-time disturbance close to homes. The particular characteristics of the digital menu boards and Play Land sign are considered in Sections 10 and 11.

Distinction between illuminated and non-illuminated signs

The banner unit and many of the operational DOT signs are not understood to be internally illuminated. That distinction should be recognised. However, it does not remove the amenity concern.

Non-illuminated signs would still contribute to the visual clutter and commercial character of the site during daylight and twilight hours. At night, they would be seen within the wider illuminated setting created by the digital menu boards, Play Land sign, Customer Order Displays, building signage, totem, car-park lighting, drive-through lighting and vehicle headlights.

The Council should therefore avoid assessing luminance in isolation from the total visual environment. The question is not only how bright each illuminated element is, but how the full signage package would be experienced by nearby residents and road users.

Required controls

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

- verified maximum luminance limits for each digital and illuminated 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 flashing, animation, scrolling, video, intermittent illumination or change in light intensity;

- static content only on digital menu boards;
- a minimum interval for any permitted content change;
- the Play Land sign to be switched off outside approved Play Space hours;
- a maximum daytime luminance demonstrably compliant with PLG05 for the correct environmental zone and sign area.

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 across the linked applications

The digital menu boards and Play Land sign proposed under this application are each specified at a maximum luminance of 600 cd/m². That figure must be assessed cumulatively with the other illuminated and digital elements proposed across the linked advertisement applications.

Across the linked applications, the applicant's own documents do not provide a single consolidated luminance schedule for all illuminated elements. In particular, the PL/2026/03702 material contains an unresolved inconsistency: 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 8-metre totem proposed under PL/2026/03737 is also specified at 600 cd/m². The result is that the Council is being asked to assess a cumulative illuminated signage package in which several elements are specified at 600 cd/m², while at least one linked illuminated element is inconsistently specified.

This is not a minor drafting issue. The Council cannot properly assess glare, light spill, night-time residential impact, driver distraction or visual clutter unless the maximum luminance, night-time luminance, dimming arrangements, hours of illumination and operating characteristics of every illuminated and digital element are clearly specified and enforceable.

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, the accompanying LiAS Design Notes and Luminaire Schedule, DWG 00, and the Site Layout Plan — Site Signage, drawing 9045-SA-2029-P008 Rev E, contain several matters that bear directly on the assessment of the proposed site signage.

a) Environmental zone

The LiAS Design Notes state that the scheme has been designed for an "E3/E4 Environmental Zone". That assumption requires scrutiny. E3 and E4 are higher-brightness suburban and urban-centre classifications. 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 digital menu boards, Play Land sign and 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 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 digital menu boards or Play Land sign.

e) Signage schedule

The Site Signage schedule confirms the scale of the proposed signage package: three double digital screens and one single digital screen, each 2034 mm high and internally illuminated to a maximum of 600 cd/m²; a Play Land sign with internally illuminated acrylic letters, also stated at a maximum of 600 cd/m²; a double-sided banner unit 4820 mm wide and 2060 mm high; and 17 DOT signs. This is an extensive package of digital, illuminated, promotional and operational signage, not modest incidental signage.

f) 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 material for this application does not demonstrate how the digital menu boards, Play Land sign and associated illuminated elements would comply with those requirements. In particular, the relationship between the proposed illuminated and digital signage, the drive-through lighting, the boundary habitats and any retained trees or bat-box locations has not been clearly assessed through a signage-specific lux spill plan.

That matters because the digital menu boards and Play Land sign are not low-impact incidental signs. They are illuminated elements within a wider 24-hour drive-through environment. Their light spill, colour temperature, luminance, operating hours, orientation and dimming arrangements all bear on whether the wider lighting strategy is compatible with the applicant's own ecological mitigation requirements.

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 digital menu boards and Play Land sign.

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.

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 menu boards

Digital displays integral to the drive-through operation

The application includes four digital menu-board structures: one single digital screen and three double digital screens.

These are not incidental signs. They are integral to the proposed drive-through ordering process and would form part of the operational apparatus of a 24-hour drive-through restaurant.

The digital menu boards should therefore be assessed as illuminated commercial display screens within a working drive-through lane, not as ordinary static site-identification signs.

Their amenity and public-safety effects depend on their luminance, orientation, content, visibility, image-change frequency, hours of operation and relationship with the wider illuminated environment of the proposed restaurant and drive-through.

Residential amenity impact

Using the applicant's scaled PDF drawings, the digital menu boards appear to be approximately 60–70 metres from the nearest visible part of Elder's residential façade. That distance does not make them remote from residential receptors.

The applicant's own noise assessment records that dwellings on Elder's side of the A361 "will have full view of the site". The Council should therefore not assume that the digital menu boards, their illumination or their glow would be visually irrelevant to nearby residents.

Even where the screens are not directly facing residential windows, their cumulative effect matters. Digital displays can create brightness, contrast and visual prominence within the wider night-time environment, particularly when seen together with Customer Order Displays, drive-through lighting, car-park lighting, illuminated building signage, the Play Land sign, the 8-metre totem and vehicle headlights.

If the digital menu boards remain illuminated during evening, night-time or early-morning hours, they would add materially to the perception of an active, commercial, vehicle-based use operating opposite homes.

The Council should assess the digital menu boards not only from ground level and the public highway, but also from the first-floor bedroom/en-suite at Elder and from the neighbouring London Road frontage homes.

Static digital content is not enough

The application describes the illumination as static. That is not sufficient to resolve the amenity or public-safety concerns.

A static digital display may still be visually prominent because of its brightness, contrast, commercial imagery and screen-based appearance. A display that changes between static images may also attract attention if content changes while drivers are negotiating the roundabout, entering the site, leaving the site or responding to pedestrians.

The Council should therefore require clear confirmation of:

- whether the digital menu boards would display one fixed image or changing static images;

- how often any image could change;
- whether any animation, movement, video, scrolling, flashing or intermittent illumination is proposed;
- the daytime and night-time luminance of each screen;
- whether automatic dimming would be linked to ambient light levels;
- whether the screens would operate during late-night or early-morning hours;
- whether the screens would be visible from Elder, neighbouring homes, Horton Road, the A361 or the roundabout approaches.

Visibility from the highway and nearby homes

The applicant should be required to provide verified sightline drawings or visualisations showing whether any of the digital menu boards would be visible from:

- Elder, including the first-floor bedroom and adjoining en-suite window facing the site;
- the neighbouring London Road frontage homes;
- Horton Road;
- the A361;
- each approach to the A361/Horton Road roundabout;
- the proposed site access;
- nearby pedestrian crossing points.

This is necessary because the same display may have different impacts depending on whether it is visible only within the site, visible from residential windows, visible from the public highway, or visible from drivers negotiating the roundabout.

The Council should not grant consent on the basis of assumption. The visibility of the digital menu boards should be established before determination.

Relationship with Customer Order Displays

The digital menu boards should also be assessed with the Customer Order Displays and drive-through canopies, not separately from them.

The applicant's supporting COD/canopy material shows that the ordering stations include illuminated "ORDER HERE" lettering, a lit canopy niche, a speaker, microphone and camera. The digital menu boards would therefore sit within a wider illuminated, audible and managed ordering environment.

That matters for residential amenity because the digital menu boards would be experienced alongside ordering activity, vehicle stopping and starting, idling, headlights, customer interaction with the ordering equipment and the wider night-time operation of the drive-through lane.

It also matters for public safety because drivers entering the site would be required to process both internal ordering instructions and the wider road environment close to the roundabout.

Required controls

If consent is granted, the digital menu boards should be subject to specific and enforceable controls requiring:

- static content only;
- no animation, flashing, scrolling, video, intermittent illumination or moving content;
- a specified minimum interval between any permitted image changes;
- no image change visible to drivers using Horton Road, the A361 or the roundabout approaches unless expressly approved by the Council following public-safety assessment;
- maximum daytime luminance demonstrated to comply with PLG05 for the correct environmental zone and sign area;
- substantially lower night-time luminance limits;
- automatic dimming linked to ambient light levels;
- switch-off outside approved restaurant and drive-through trading hours;
- no operation during late-night or early-morning hours unless expressly approved following residential-amenity and public-safety assessment;
- approved orientation and screening to prevent glare, light spill or driver distraction;
- verified sightline drawings or visualisations before installation.

Conclusion on digital menu boards

The digital menu boards are among the most sensitive elements of PL/2026/03738. They are illuminated commercial display screens, integral to the proposed drive-through operation, positioned within a site directly opposite homes and beside a sensitive roundabout.

Advertisement consent should not be granted unless the Council is satisfied, on verified sightline and luminance evidence, that the digital menu boards would not cause unacceptable light intrusion, visual intrusion, glare, driver distraction or cumulative visual clutter.

11. Banner unit, Play Land sign and operational signage

Double-sided banner unit

The proposed double-sided banner unit is a substantial freestanding advertisement. The applicant's Site Signage schedule identifies it as approximately 4.82 metres wide and 2.06 metres high. Using the applicant's scaled PDF drawings, it appears to be approximately 30–35 metres from the nearest visible part of Elder's residential façade.

The banner unit is understood not to be internally illuminated; the applicant should confirm. That distinction should be recognised. However, lack of internal illumination does not make it harmless in amenity terms.

Its purpose appears promotional rather than necessary for the safe operation of the site. It would add another freestanding commercial sign to a compact drive-through

layout already containing digital menu boards, operational signage, Customer Order Displays, illuminated building signage and the proposed 8-metre totem.

In this location, close to homes and beside the A361/Horton Road roundabout, the banner unit would contribute to visual clutter and the commercialisation of the London Road frontage. It should therefore be assessed cumulatively with the wider signage package, not treated as an isolated non-illuminated sign.

If consent is granted, the banner unit should be limited to fixed, non-illuminated, non-digital content only. There should be no digital display, animation, internal illumination, external illumination or frequent promotional change without further express advertisement consent.

Play Land sign

The Play Land sign requires separate scrutiny. It is internally illuminated and stated to have a maximum luminance of 600 cd/m². Using the applicant's scaled PDF drawings, the Play Space and Play Land sign appear to be approximately 50–55 metres from the nearest visible part of Elder's residential façade.

The Play Land sign is materially different from ordinary directional signage. It advertises and reinforces an external activity area. The associated Play Space would be capable of attracting children's voices, family congregation, car-door activity and external movement in addition to the drive-through and restaurant use.

That matters in this location because the Play Land sign appears to sit within the line of view from the first-floor bedroom/en-suite at Elder, as illustrated in Figure 3. It should therefore not be assessed only from ground level or from within the restaurant site. Its residential effect should be assessed from elevated residential windows facing the site across the A361.

Because the relevant accommodation at Elder is at first-floor level, boundary fencing and ground-level planting cannot be assumed to screen the Play Land sign or its illumination. Even if the sign is lower than the 8-metre totem, it would still form part of the illuminated signage environment visible from the residential frontage.

The relevant Elder-facing boundary treatment is a 1.1 m close-boarded "headlight screen". It is a ground-level measure and cannot reasonably be assumed to screen the Play Land sign, digital menu boards or associated illuminated environment from the first-floor bedroom/en-suite at Elder.

If illuminated during evening, night-time or early-morning periods, the Play Land sign would add to the perception of an active, family-oriented external commercial area operating opposite homes. That would be harmful to residential amenity, particularly when experienced with the digital menu boards, Customer Order Displays, drive-through lighting, car-park lighting, building signage, the 8-metre totem and vehicle headlights.

If consent is granted, the Play Land sign should be switched off outside approved Play Space hours. Any restriction on the operation of the Play Space itself should be secured, if necessary, under the main planning application rather than through advertisement consent.

Operational signage

The application also includes numerous operational signs, including accessible bay signs, parked-order bay signs, litter signs, pedestrian crossing signs, give-way signs, speed-limit signs and look-left / look-right / look-both-ways signs.

Some operational signage may be necessary for site management. I do not object to necessary safety or accessibility signs in principle. However, the number and variety of signs is itself material. It demonstrates that the proposed use is not an ordinary restaurant with modest identification signage, but a managed vehicle-circulation environment requiring extensive instruction and control.

That reinforces the residential amenity concern. The operational signs would be distributed across the car park, pedestrian routes and drive-through environment, adding to the cumulative visual clutter of the site. Even where not illuminated, they would contribute to the commercial and traffic-managed character of the development during daytime and twilight hours.

The operational signage is also relevant to public safety. Where internal traffic-management signs, pedestrian instruction signs, commercial signs and public highway signs are seen together near a roundabout and site access, there is a risk of visual overload or confusion. The Council should therefore assess whether the operational signage is proportionate, necessary and clearly distinguishable from public highway signage.

No operational sign should be installed unless its need, siting, wording, appearance and relationship with public highway signage have first been assessed and approved by the Council.

Cumulative effect

The banner unit, Play Land sign and operational signs should not be dismissed as minor elements. Together, they show the intensity of the proposed drive-through environment.

The banner unit adds promotional commercial clutter. The Play Land sign adds internally illuminated branding and draws attention to an external activity area within the line of view from the first-floor bedroom/en-suite at Elder. The operational signs demonstrate the level of traffic management and customer instruction required by the proposed use.

Taken together with the digital menu boards, Customer Order Displays, building signage, 8-metre totem, car-park lighting, drive-through lighting and vehicle headlights, these signs would contribute to a visually intrusive and highly commercialised environment close to homes and beside a sensitive roundabout.

For those reasons, the banner unit, Play Land sign and operational signage weigh against the grant of advertisement consent on amenity and public-safety grounds.

12. Cumulative impact across the signage applications

Cumulative signage impact

This application should not be assessed as a standalone package of site signs. Across PL/2026/03702, PL/2026/03737 and PL/2026/03738, the proposed advertisement package would include internally illuminated building signage, PAY/COLLECT drive-through lettering, a digital booth screen, soffit lighting, digital menu boards, an

illuminated Play Land sign, a freestanding banner unit, the 8-metre internally illuminated totem and numerous operational signs.

Taken together, those elements would create a heavily branded, digitally supported and illuminated drive-through environment beside the A361/Horton Road roundabout and close to residential properties.

That cumulative impact is particularly important because the affected receptor includes a first-floor bedroom at Elder used regularly at night, above the level of the proposed ground-level boundary treatment.

The signage proposed under this application is central to that cumulative effect. The digital menu boards are integral to the drive-through operation; the Play Land sign adds illuminated branding for an external activity area; the banner unit adds freestanding promotional signage; and the operational signs demonstrate the intensity of the vehicle-circulation environment.

The Council should therefore assess PL/2026/03738 cumulatively with PL/2026/03702, PL/2026/03737 and the main 24-hour drive-through proposal under PL/2026/03683. It should not treat the digital menu boards, Play Land sign, banner unit or operational signs as isolated and minor elements.

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;

the Aldi Transport Assessment forecasts combined total development trips of 83 two-way movements in the weekday morning peak, 199 in the weekday evening peak and 289 on Saturday before trip-type adjustment.

After applying its trip-type assumptions, it identifies a combined net effect at the London Road / Horton Road roundabout of 26 two-way movements in the AM peak, 76 in the PM peak and 105 on Saturday.

I do not rely on those figures to suggest that the roundabout lacks capacity. Their relevance for this advertisement application is that the Aldi / Bike School proposal is not a minor neighbouring use: it would add vehicle movements, turning movements, servicing activity, pedestrian and cycle movements, EV-charging activity, signage, lighting and evening activity to the same short corridor in which the proposed McDonald's digital and illuminated signage would be seen.

- 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 vehicle activity, commercial lighting, illuminated signage, digital displays, evening activity, pedestrian movements and visual complexity around the same junction.

That matters because this advertisement application would add further digital, illuminated and operational signage to a corridor that may already be moving towards a more intensive commercial and vehicle-based character. The issue is not whether the other developments are acceptable in their own right. The issue is whether the Council has properly assessed the cumulative amenity and public-safety effect of adding this signage package to that changing corridor.

Static baseline risk

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

The proposed digital menu boards, Play Land sign, banner unit and operational signage would be experienced alongside the linked McDonald's signage applications and, potentially, alongside other nearby commercial development, vehicle movements, EV-charging activity, drive-through activity, signage and evening lighting.

For nearby residents, the cumulative effect would be a materially more commercialised, illuminated and visually busy environment on the London Road frontage. For road users, it would increase the amount of information, light, movement and signage encountered close to the A361/Horton Road roundabout.

Conclusion on cumulative impact

The cumulative impact is therefore central to the assessment of PL/2026/03738. The application is not simply about whether each individual sign is acceptable in isolation. It is about whether this package of digital, illuminated, promotional and operational signage would add unacceptable visual intrusion, light impact, commercial clutter or driver distraction when viewed together with:

- the main 24-hour McDonald's drive-through proposal;
- the illuminated building signage and digital booth screen under PL/2026/03702;
- the 8-metre illuminated totem under PL/2026/03737;
- the changing commercial and highway context of the wider A361/Horton Road corridor.

In my submission, that cumulative impact weighs against the grant of advertisement consent on both amenity and public-safety grounds.

13. Consent period and removal

Consent period

The application seeks advertisement consent until 12 June 2036. That would amount to a ten-year consent for a substantial package of digital, illuminated, promotional and operational signage in a sensitive location close to homes and beside the A361/Horton Road roundabout.

In this location, there is no justification for a ten-year consent. The standard express advertisement consent period is five years where no other period is specified. Given the proximity of the proposed signage to residential property, the presence of digital and illuminated elements, the relationship with the roundabout and the unresolved cumulative lighting and public-safety concerns, any consent should be limited to the standard five-year period at most.

A shorter consent period would also be justified. It would allow the Council to review the real-world effect of the signage once operating conditions, night-time luminance, driver visibility and residential amenity impacts are known.

Class 14 deemed consent

The Council should also take account of Class 14 of Schedule 3 to the 2007 Regulations. Once express advertisement 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 signage proposed under PL/2026/03738 is not low-level or incidental. It includes digital menu boards, an illuminated Play Land sign, a double-sided banner unit and numerous operational signs forming part of a wider 24-hour drive-through environment.

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 under PL/2026/03683. If that restaurant is not implemented, or if it permanently ceases to operate, there would be no justification for retaining digital menu boards, a Play Land sign, a banner unit or drive-through operational signage in this location.

Any consent should therefore require the signage to be removed, or the illumination and digital displays permanently disabled, if the associated restaurant and drive-through are not implemented or permanently cease trading.

In addition, all illuminated and digital signage should be switched off whenever the restaurant and drive-through are closed to customers. That requirement is particularly important for the digital menu boards and Play Land sign, which would otherwise be capable of continuing to cause night-time visual intrusion and public-safety concerns even when the associated use is not operating.

Banner unit and promotional content

The banner unit requires particular control because its purpose appears promotional rather than operational. If consent is granted, the banner should be limited to fixed, non-illuminated content only. It should not be used for frequently changing promotions, temporary advertising campaigns, external illumination, digital display or animated content without further express consent.

That is necessary to prevent the banner from becoming a continuing source of commercial clutter close to homes and beside the roundabout.

Required condition

If consent is granted, it should include an express condition requiring removal of all signage approved under PL/2026/03738, including supporting structures, digital display equipment, illumination and electrical infrastructure, if:

- the associated restaurant and drive-through are not implemented;
- the associated restaurant and drive-through permanently cease trading;
- the express advertisement consent expires and no further express consent has been granted;
- any sign is no longer required for the lawful operation of the associated restaurant and drive-through.

Without such a condition, there is a risk that a substantial package of digital, illuminated and operational signage could remain on the site after the justification for it has fallen away, causing continuing harm to amenity and public safety.

14. 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 signage proposed under PL/2026/03738 is intended solely to serve the proposed McDonald's restaurant and drive-through under PL/2026/03683. The digital menu boards, Play Land sign, banner unit and operational signs have no independent functional justification apart from that proposed use.

Their amenity and public-safety effects would therefore arise because they are part of the proposed 24-hour drive-through environment. They should not be assessed as freestanding advertisements divorced from the restaurant, drive-through lanes, Customer Order Displays, vehicle movements, car-park lighting, drive-through lighting, building signage and the 8-metre totem.

If the main application is refused, not implemented or later ceases to operate, the justification for this signage package would fall away. The signs would no longer serve an approved operational use on the site. They would instead leave digital, illuminated, promotional and operational commercial signage close to homes and beside the A361/Horton Road roundabout, with continuing potential for visual intrusion, light spill, glare, visual clutter and driver distraction.

The signage should not be approved in advance of the main use

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.

It would be premature to grant advertisement consent for a substantial package of digital menu boards, an illuminated Play Land sign, a banner unit and operational drive-through signage before the Council has resolved whether the underlying 24-hour drive-through use is acceptable in planning terms.

For advertisement-control purposes, the relevance is not commercial need, but the fact that the amenity and public-safety effects of the signage arise from, and depend on, the proposed 24-hour drive-through use.

That is particularly important here because the proposed signage is not incidental branding. It forms part of the working apparatus of the proposed drive-through. The digital menu boards are integral to the ordering process; the operational signs manage vehicle and pedestrian movement; the Play Land sign relates to an external activity area; and the banner unit adds promotional commercial presence.

Those effects make sense only in the context of an approved and operating restaurant. Without that underlying use, the signage would amount to unnecessary commercial clutter in a sensitive location.

Approval of the main use would not make this signage acceptable automatically

Even if the Council were minded to approve PL/2026/03683, it would not follow that this level of digital, illuminated and operational signage is acceptable.

The advertisement application must still be assessed on its own statutory grounds of amenity and public safety. The Council must therefore consider whether the specific signage proposed under PL/2026/03738 would cause unacceptable visual intrusion, night-time light impact, cumulative commercial clutter or driver distraction.

That assessment must be cumulative. The digital menu boards, Play Land sign, banner unit and operational signs should be considered alongside the illuminated building signage and digital booth screen proposed under PL/2026/03702, the 8-metre illuminated totem proposed under PL/2026/03737, and the wider 24-hour drive-through use proposed under PL/2026/03683.

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 package is intended to serve is not a foregone conclusion.

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

Need for linkage condition

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;
- no digital menu board may operate unless and until the drive-through use is lawfully implemented;
- illumination must be switched off whenever the restaurant and drive-through are closed to customers;
- digital displays must be switched off whenever the restaurant and drive-through are closed to customers;
- the Play Land sign must be switched off whenever the Play Space is closed;
- the signs, associated illumination, digital display equipment and supporting structures must be removed, or permanently decommissioned, if the restaurant and drive-through are not implemented or permanently cease trading.

Without those controls, there is a risk that advertisement consent could outlive the planning justification for the signage, leaving a substantial package of digital, illuminated and operational commercial signs in a sensitive residential and highway location.

15. Requested outcome

Further information before determination

Before granting advertisement consent, the Council should require a consolidated signage and lighting schedule for PL/2026/03738 and the linked signage applications.

That schedule should confirm, for every illuminated, digital, promotional and operational sign:

- precise siting;
- orientation;
- sign dimensions and sign area;
- maximum luminance;
- night-time luminance;
- dimming arrangements;
- colour temperature;
- operating hours;
- content controls;
- visibility from residential properties;
- visibility from Horton Road, the A361 and the A361/Horton Road roundabout approaches.

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

- the luminance, night-time luminance, dimming arrangements and content-control arrangements for each digital menu board;
- whether each digital menu board would display one fixed image or changing static images;
- the minimum interval between any permitted image changes;
- whether any animation, movement, video, scrolling, flashing or intermittent illumination is proposed;
- whether any digital menu board would be visible from Horton Road, the A361, the roundabout approaches, the proposed site access or nearby pedestrian crossing points;
- whether any digital menu board would be visible from Elder or the neighbouring London Road frontage homes;
- the siting, orientation and visibility of the Play Land sign, including from the first-floor bedroom/en-suite at Elder;
- the hours during which the Play Land sign would be illuminated;
- whether the banner unit would remain fixed, non-illuminated and non-digital;
- the purpose, necessity and siting of each operational sign;
- whether any operational sign could resemble, obscure, compete with or distract from public highway signage.
- 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 also require verified sightline drawings or visualisations showing the appearance and visibility of the digital menu boards, Play Land sign, banner unit and operational signage from Elder, the neighbouring London Road frontage homes, Horton Road, the A361, the roundabout approaches, the proposed site access and nearby pedestrian crossing points.

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

Primary request

I respectfully request that Wiltshire Council refuses advertisement consent for PL/2026/03738.

The proposed signage package would introduce multiple digital, illuminated, promotional and operational signs into a sensitive residential and highway location. It would form part of a wider 24-hour drive-through environment close to homes and beside the A361/Horton Road roundabout.

For the reasons set out above, the proposal would cause unacceptable harm to amenity and raise unresolved public-safety concerns. It should therefore be refused.

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/2026/03738 to be displayed unless and until the associated restaurant and drive-through use under PL/2026/03683 has been lawfully implemented.
2. No digital menu board to operate unless and until the associated drive-through use has been lawfully implemented.
3. No illuminated or digital signage approved under PL/2026/03738 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.
4. 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, operating hours and visibility of each illuminated or digital element.
5. Maximum luminance limits for every illuminated and digital sign must be assessed against PLG05 for the correct environmental zone and sign area, with the environmental zone first confirmed by the Council.
6. Substantially lower night-time luminance limits must be imposed for every illuminated and digital sign.
7. All illuminated and digital signage must include automatic dimming linked to ambient light levels.
8. 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.
9. Digital menu boards must display static images only.
10. A minimum interval must be specified for any permitted image change on the digital menu boards.
11. No digital image change 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.
12. No digital or illuminated sign 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.
13. Before installation of any digital menu board, the applicant must submit verified sightline drawings or visualisations showing whether the sign 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.

14. Before installation of the Play Land sign, the applicant must submit verified sightline drawings or visualisations showing its visibility from first-floor accommodation at Elder and from the neighbouring London Road frontage homes.
15. The Play Land sign must be switched off outside approved Play Space hours.
16. The Play Land sign must not be illuminated during evening, night-time or early-morning hours unless expressly approved following assessment of residential amenity, including the effect on first-floor accommodation at Elder.
17. Any restriction on the operation of the Play Space itself should be secured, if necessary, under the main planning application rather than through this advertisement consent.
18. The banner unit must be limited to fixed, non-illuminated, non-digital content only.
19. No external illumination, internal illumination, digital display, animation or frequently changing promotional content may be applied to the banner unit without further express advertisement consent.
20. No sign may cause glare, light spill, visual intrusion, excessive brightness or driver distraction.
21. No sign may resemble, obscure, compete with or distract from public highway signage.
22. No operational sign may be installed unless its need, siting, wording, appearance and relationship with public highway signage have first been assessed and approved by the Council.
23. 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.
24. The signage-specific lux spill plan must be reviewed by a suitably qualified ecologist before any illuminated or digital sign is installed.
25. 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.
26. All signage, digital display equipment, illumination, electrical infrastructure and supporting structures approved under PL/2026/03738 must be removed or permanently decommissioned if the associated restaurant and drive-through are not implemented or permanently cease trading.
27. 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 signage of this scale and character can be made acceptable in this location.

Committee determination

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/2026/03738 be determined by Planning Committee rather than under delegated powers, and considered alongside the related applications.

16. Conclusion

PL/2026/03738 is not a minor or freestanding site-signage application. It proposes a substantial package of digital, illuminated, promotional and operational signage associated with a proposed 24-hour McDonald's drive-through beside the A361/Horton Road roundabout and close to residential properties.

The digital menu boards, illuminated Play Land sign, double-sided banner unit and numerous operational signs would form part of a wider illuminated and digitally branded drive-through environment. Their impact would be experienced cumulatively with the main 24-hour use proposed under PL/2026/03683, the illuminated building signage and digital booth screen proposed under PL/2026/03702, and the 8-metre illuminated totem proposed under PL/2026/03737.

The proposed signage would cause harm to residential amenity through visual intrusion, commercial clutter, light impact and cumulative night-time disturbance. That harm is particularly significant because Elder and the neighbouring London Road frontage homes have an open, unscreened relationship with the site. The Play Land sign is also within the line of view from first-floor accommodation at Elder and would advertise an external activity area close to residential property.

That proximity is particularly significant because the affected accommodation at Elder includes a first-floor bedroom with an adjoining en-suite window facing the application site.

That accommodation sits above the proposed ground-level boundary treatment, including the 1.1 m Elder-facing close-boarded "headlight screen", which cannot reasonably be assumed to protect elevated residential windows from the cumulative illuminated signage environment.

The proposal also raises unresolved public-safety concerns. The signage would add digital displays, operational instructions, promotional signage and illumination close to a sensitive roundabout, the proposed site access, pedestrian crossing points, highway signage and the national speed-limit terminal.

The Council should not grant consent unless satisfied that the signage would not distract drivers, create excessive visual clutter or compete with highway signage.

The applicant has not provided sufficient verified information on sightlines, luminance, night-time dimming, content control, operating hours, visibility from homes, visibility from the highway, or the cumulative effect of the signage across the linked applications.

For those reasons and assessed strictly on the statutory advertisement-control grounds of amenity and public safety, I respectfully request that Wiltshire Council refuses advertisement consent for PL/2026/03738.