

Objection to Advertisement Application PL/2026/03737

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

Proposed 8-metre internally illuminated freestanding Drive-Thru totem sign

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 8-metre internally illuminated totem 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/2026/03737 and ask Wiltshire Council to refuse advertisement consent.

The decisive amenity harm is night-time light intrusion into a first-floor bedroom at Elder, in regular night-time use, only approximately 25–30 metres from the proposed 8-metre internally illuminated totem. That relationship is illustrated in the key visual context figures below and addressed in Sections 3, 5, 6 and 8.

The relevant first-floor bedroom adjoins an en-suite whose window faces the application site. Obscure glazing reduces outlook but does not prevent light intrusion; illumination entering the en-suite would also be perceptible from the bedroom through the glazed internal door.

Because that accommodation is at first-floor level, it sits above the proposed ground-level boundary treatment. The relevant Elder-facing boundary is shown on the applicant's Site Layout Plan as a 1.1 m close-boarded "headlight screen", not a screen capable of protecting elevated windows from an 8 m internally illuminated sign.

The applicant's own noise assessment records that the dwellings on Elder's side of the A361 "will have full view of the site", confirming the open, unscreened relationship between the frontage homes and the proposed illuminated signage.

The totem would not be a modest directional sign. It would be the tallest proposed sign, among the closest illuminated elements to Elder, and would form part of a wider 24-hour illuminated drive-through environment. Its height, luminance, siting and visibility would cause unacceptable night-time light intrusion and visual harm to residential amenity. This cumulative context is addressed in Sections 1, 6, 9 and 10.

There is also a public-safety objection. The totem would stand close to the A361/Horton Road roundabout, where drivers must already respond to turning traffic, speed transition, highway signs, pedestrian movements, the proposed site access and other illuminated or digital signage.

The Council should not grant consent unless satisfied that the sign would not distract drivers, add visual clutter, or compete with highway signage at this sensitive junction. This is addressed in Section 7.

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/2026/03737 totem to Elder and the A361/Horton Road roundabout

Important note

The two figures below have been prepared by the objector from the applicant's submitted drawings for applications PL/2026/03683, 03702, 03737 and 03738. They are schematic illustrations, not survey measurements.

The approximate 25–30 m separation has been scaled from the applicant's PDF drawings. The applicant should be requested to confirm the precise siting, separation distance and sightlines. Heights are shown to relative scale, but horizontal distances have been compressed for clarity; the figures are therefore indicative and not to scale.

The 8 m totem within the cumulative illuminated frontage, in relation to Elder

Applications PL/2026/03737, 03702, 03683 and 03738 (linked) — Cannings Hill Garage, Devizes

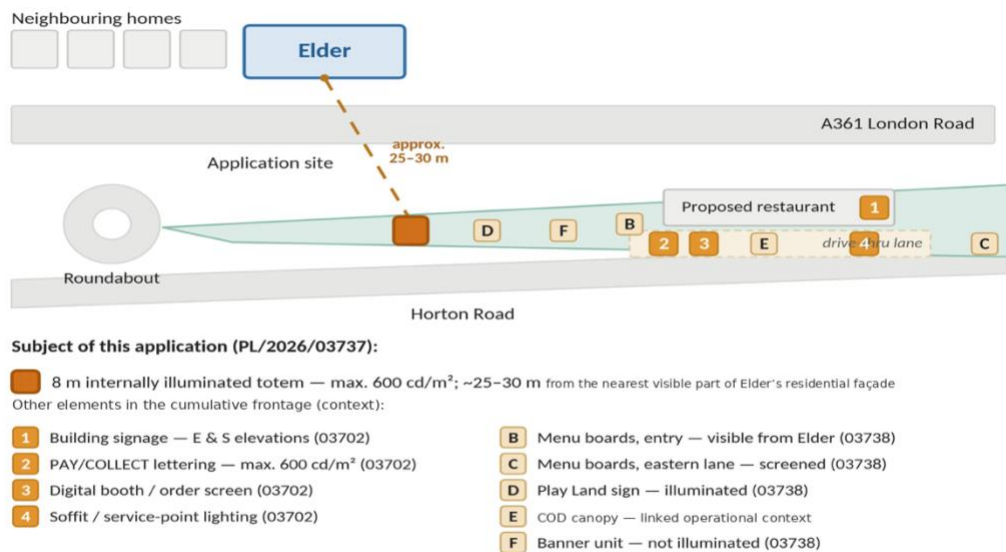


Figure 1 — The 8 m totem (the subject of this application) shown within the cumulative illuminated frontage, in relation to Elder; based on the applicant's Site Layout Plan.

Cumulative illuminated frontage across the A361 — the 8 m totem as its tallest element

Application PL/2026/03737, with linked applications PL/2026/03683, 03702 and 03738 — Cannings Hill Garage, Devizes

Objector's indicative composite — not to scale; heights and positions illustrative, based on the applicant's submitted layout, signage and lighting information.

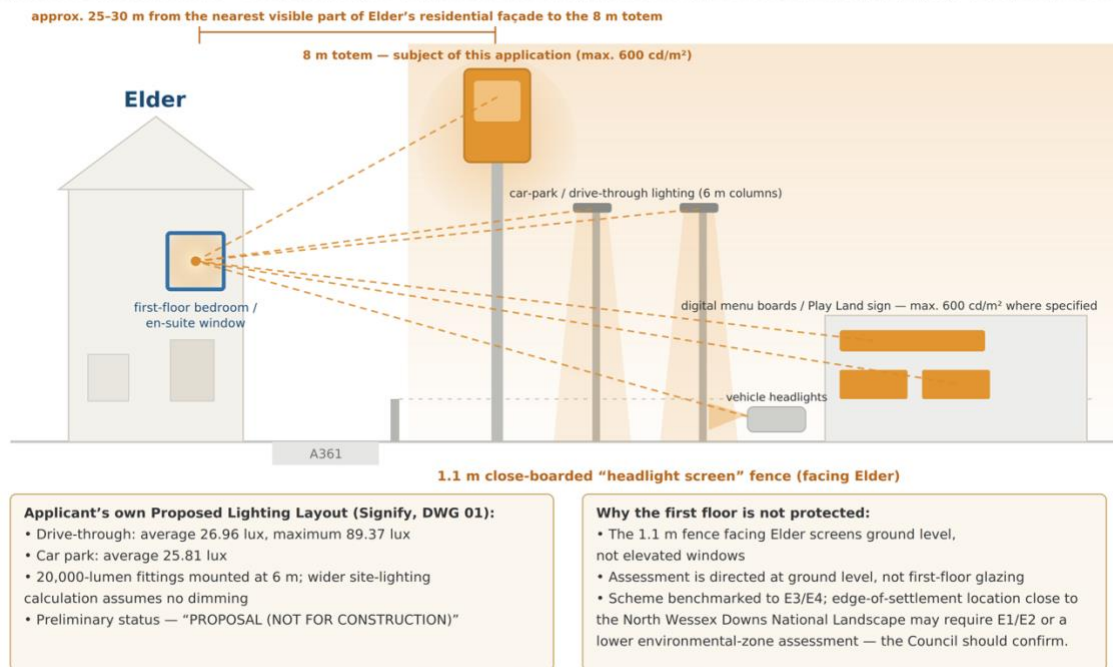


Figure 2 — Indicative section showing the 8 m totem within the cumulative illuminated frontage across the A361, with the first-floor sight line from Elder shown. Not to scale. Heights are shown approximately to relative scale; horizontal distances are compressed for clarity. The applicant should confirm precise siting, separation distance and sightlines.

Qualifications applying to the figures above:

The 8 m totem is internally illuminated and shown at its stated maximum of 600 cd/m² (applicant's drawing); it stands approximately 25–30 m from the nearest visible part of Elder's residential façade and is the tallest element in the frontage.

The first-floor bedroom at Elder sits above the 1.1-metre Elder-facing close-boarded "headlight screen" shown on the applicant's Site Layout Plan. That ground-level treatment cannot reasonably be assumed to screen an 8-metre internally illuminated sign.

The other elements are shown for cumulative context: the building signage, PAY/COLLECT lettering, booth screen and soffit lighting under PL/2026/03702; the menu boards, Play Land sign and banner under PL/2026/03738; and the Customer Order Displays / canopy as linked operational context from PL/2026/03683. The banner is understood not to be internally illuminated; the applicant should confirm.

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 the totem's siting, luminance, environmental zone, dimming, operating hours, visibility and cumulative effects.

If, contrary to my primary position, consent remains under consideration, the strict conditions identified in Section 13 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 8-metre internally illuminated totem would stand approximately 25–30 metres from the nearest visible part of Elder's residential façade and would be visible in close relationship with a first-floor bedroom. The bedroom sits above ground-level boundary treatment and would not be protected from the visual presence, glow or light intrusion of a tall internally illuminated sign. The Elder-facing boundary treatment is shown on the applicant's Site Layout Plan as a 1.1-metre close-boarded "headlight screen", which is plainly a ground-level treatment and not a reliable answer to first-floor light intrusion. (Sections 3, 5, 6 and 8.)

2. The totem would not be experienced in isolation. The totem would form part of a wider 24-hour illuminated drive-through environment, including building signage, PAY/COLLECT lettering, a digital booth screen, digital menu boards, the Play Land sign, Customer Order Displays, car-park and drive-through lighting, internal restaurant lighting and vehicle headlights. Its impact should therefore be assessed cumulatively with PL/2026/03683, PL/2026/03702 and PL/2026/03738, not as a standalone advertisement. (Sections 1, 6, 9 and 10.)

3. Inadequate and inconsistent lighting evidence. The submitted material does not provide a single verified lighting and luminance schedule for the full illuminated signage package. The totem is specified at 600 cd/m², while linked signage documents contain unresolved inconsistencies, including the PAY/COLLECT 500 / 600 cd/m² discrepancy. The wider lighting material also refers to an E3/E4 Environmental Zone, 20,000-lumen site-lighting fittings mounted at 6 metres, no dimming in the wider site-lighting calculation, and a preliminary “PROPOSAL (NOT FOR CONSTRUCTION)” status. The Council cannot safely assess residential amenity or public safety without verified luminance, dimming, operating-hours and sightline evidence. (Sections 8 and 9.)

4. Public-safety concern at the A361/Horton Road roundabout. The totem would stand close to a sensitive highway environment where drivers must already respond to the roundabout, speed-limit transition, highway signs, proposed site access, pedestrian crossing points, vehicle movements and other illuminated or digital signage. A tall internally illuminated roadside advertisement would add visual clutter and may compete for driver attention at a location where public safety requires particular care. (Section 7.)

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

1. Linked applications

This is one of four linked applications and should not be assessed in isolation from them:

- 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/2026/03702 — illuminated building signage, PAY/COLLECT lettering, digital booth screen and soffit lighting;
- PL/2026/03738 — site signage, including digital menu boards, banner unit, Play Land sign and operational signs.

Taken together, the main McDonald's application and the linked advertisement applications would create a heavily illuminated, branded and operationally intensive 24-hour drive-through environment beside a roundabout and close to homes. That cumulative context is central to the assessment of PL/2026/03737.

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 (December 2024) 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 this advertisement on residential amenity in terms of visual intrusion, light spill, glare and night-time impact.

This extends to concerns regarding public safety, including driver distraction and visual clutter at the roundabout, assessed cumulatively with the linked signage 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, all of which 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 scale, height, illumination, siting and cumulative impact of the proposed 8-metre internally illuminated

freestanding Drive-Thru totem in this location, close to residential properties and immediately beside the A361/Horton Road roundabout.

Proximity

Using the applicant's scaled PDF drawings, the proposed 8-metre illuminated totem appears to be approximately 25–30 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 sightline to Elder.

Even on a conservative reading, this is not a remote or background commercial sign. It is a tall, illuminated structure close to existing homes and close to the roundabout, and that proximity should be central to the assessment of both residential amenity and public safety.

Photographs 1–6 and 12–17 in the accompanying Schedule of Photographs, taken on 16 July 2026, show that relationship and the existing night-time environment.

4. Relevant policy and guidance

Wiltshire Core Strategy Core Policy 57 supports the amenity assessment, addressing design, visual amenity, residential amenity, light intrusion and the compatibility of adjoining uses.

In the context of this advertisement application, Core Policy 57 requires development to protect residential amenity, including from light intrusion, and that requirement applies directly to the illumination of the proposed signage.

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 as 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 freestanding totem approximately 8 metres high, 1.44 metres wide and 0.32 metres deep, with internally illuminated Golden Arches to both faces and an internally illuminated "Drive Thru" appendage.

This is not a modest directional sign. Its height, illumination and position would make it a dominant visual feature at the A361/Horton Road roundabout, causing unacceptable harm to visual amenity in the immediate area, particularly for Elder and other nearby homes.

The scale, height and roadside advertising function of the proposed totem are characteristic of high-visibility roadside signage. That makes its siting close to residential properties and beside a roundabout particularly sensitive.

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

Cumulative lighting context

The site is not an isolated commercial estate. It adjoins the A361/Horton Road roundabout and sits close to existing homes. The proposed totem would therefore not be experienced as a standalone sign, but as part of a wider illuminated drive-through environment.

Across the linked applications, that environment would include car park and drive-through lighting, Customer Order Displays, illuminated building signage, digital menu boards, internal restaurant lighting, operational signage and vehicle headlights.

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

The Council should therefore assess the totem's cumulative lighting impact and not treat it as an isolated advertisement.

First-floor bedroom

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.

Of the proposed signage elements, the 8-metre internally illuminated totem is both the tallest and among the closest to Elder, at approximately 25–30 metres from the nearest visible part of the residential façade.

The harm identified in this application arises specifically from the totem's height, luminance, siting and visibility from nearby homes and the roundabout, assessed in the context of the wider illuminated drive-through environment.

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 light, glow or visual presence of an 8 m internally illuminated totem.

A structure of this height and brightness, if illuminated through the late-night and early-morning hours opposite accommodation used for sleep, would cause light intrusion harmful to residential amenity.

This does not appear to have been addressed in the applicant's lighting material, which is directed principally at ground-level and boundary effects rather than elevated residential windows at Elder.

Applicant's own evidence of open exposure

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. The neighbouring homes along the London Road frontage therefore share the same open exposure to the totem's illumination.

A first-floor or other residential window with a full, unscreened view of an 8-metre internally illuminated totem at this proximity would be directly exposed to its illumination and glow, above the level at which ground-level boundary screening could offer meaningful protection.

Wider visual amenity and dark skies

The amenity concern is also wider than the effect on individual homes. This is an edge-of-settlement approach, where the character of the locality changes from Devizes towards its rural fringe.

There is no comparable 8-metre internally illuminated freestanding advertisement in the immediate residential frontage context. The proposed totem would materially intensify the roadside-commercial character of this approach and would be harmful to the general amenity characteristics of the locality.

It would also erode the relative darkness and tranquillity of this edge-of-settlement approach, close to open countryside.

That impact should be assessed against the general characteristics of the locality as well as the amenity of nearby residents.

7. Public safety at the roundabout

Sensitive highway location

The proposed totem 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 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 proposed totem would add a tall, internally illuminated roadside advertisement into a visual field already containing the roundabout, speed-limit terminal, highway signs, road markings, vehicle movements, pedestrian activity and the proposed site access.

Photographs 7–11 in the accompanying Schedule of Photographs, taken on 16 July 2026, show the roundabout approaches and the existing highway-signage environment.

Driver distraction and visual clutter

The Council should assess the sign's visibility from each approach to the roundabout, its relationship with the proposed access, and whether its illumination, height and roadside-advertising function could distract drivers or compete with highway signing.

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

Those digital and illuminated elements would increase the overall visual load at the roundabout, heightening the risk that the totem would distract drivers or compete with highway signage.

The concern is not simply the sign's brightness. An 8-metre internally illuminated totem would be seen in the same visual field as the roundabout, the speed-limit terminal, existing highway signs, vehicles braking and accelerating, and traffic entering and leaving Horton Road. It would place an additional demand on driver attention at a point where it is already heavily loaded.

Speed-limit terminal and night-time conditions

This concern is heightened by the speed environment. The national speed-limit terminal is positioned close to the site frontage as the A361 leaves Devizes north-eastwards towards Bishops Cannings. The applicant's own Transport Assessment confirms that the 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 an 8-metre internally illuminated totem in this location would add to the visual complexity encountered by drivers approaching and negotiating the A361/Horton Road roundabout.

As an illuminated structure positioned close to the roundabout, the totem also raises a distinct obstruction concern, separate from distraction.

The Council should confirm that it would neither mask nor compete for attention with the existing speed-limit terminal sign or roundabout signing on the approach.

Consent should not be granted unless the Council is satisfied that the sign 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 an 8-metre internally illuminated totem 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.

An 8-metre illuminated totem that risks distracting drivers at this location would run counter to that adopted safety objective and would weigh against the grant of advertisement consent on public-safety grounds.

8. Illumination and luminance

PLG05 compliance

The totem is proposed to be internally illuminated at a maximum static luminance of 600 cd/m². The recognised technical benchmark is the Institution of Lighting Professionals' Professional Lighting Guide PLG05 (2023), *The Brightness of Illuminated Advertisements*, which sets recommended maximum luminance levels by sign size and environmental zone.

The maximum luminance appropriate to this sign depends on the correct environmental zone. This is a residential, edge-of-settlement location where existing night-time lighting is principally highway and street lighting, rather than continuous high-brightness commercial illumination. That context supports a lower-brightness environmental zone than would apply to a typical suburban or urban commercial frontage. The site is also close to open countryside.

The applicant should therefore be required to state and justify the assumed environmental zone, identify the relevant sign area, and demonstrate that the proposed 600 cd/m² luminance complies with PLG05 for that zone and sign size.

As submitted, the application does not demonstrate compliance with PLG05 for the correct environmental context, and advertisement consent should not be granted until it does.

The inconsistencies in the submitted luminance and wider lighting information are considered in Section 9.

Night-time residential impact

Whatever environmental zone is adopted, the decisive issue for residential amenity is the night-time effect. A static luminance of 600 cd/m² maintained through the late-night and early-morning hours, close to homes and opposite first-floor accommodation used for sleep, would create an unacceptable risk of light intrusion and visual disturbance.

The issue is not simply whether 600 cd/m² can be justified as a daytime or general maximum. The Council must consider whether that luminance is acceptable during the hours when background lighting is lower, residential sensitivity is greater, and the proposed totem would form part of a wider illuminated 24-hour drive-through environment.

Required controls

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

- a substantially lower night-time luminance limit;
- automatic dimming linked to ambient light levels;
- controlled hours of illumination;

- no flashing, animation, scrolling, intermittent illumination or change in light intensity;
- 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.

9. Inconsistent luminance information and ecological lighting conflict

Inconsistent luminance information across the linked applications

The proposed totem is specified at a maximum luminance of 600 cd/m². That figure should not be assessed in isolation. The totem forms part of a wider illuminated signage package in which other elements, including the digital menu boards and Play Land sign proposed under PL/2026/03738, are also specified at 600 cd/m².

Across the linked applications, the applicant's own documents do not provide a single consolidated luminance schedule for all illuminated and digital 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.

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, 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 totem.

a) Environmental zone

The LiAS Design Notes state that luminaire maintenance factors have been calculated 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 proposed totem luminance and the wider night-time lighting environment. 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's calculations give the drive-through an average of 26.96 lux and a maximum of 89.37 lux at ground level, and the car park an average of 25.81 lux. Those are not received lux levels at Elder, but they are part of the proposed illuminated environment directly across the A361 from first-floor residential accommodation. A maximum approaching 90 lux within a proposed 24-hour drive-through environment in this setting is not a modest lighting context.

The Proposed Lighting Layout 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 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 Proposed Lighting Layout therefore appears to confirm, in the applicant's own lighting paperwork and by product code, the 8,000-versus-20,000-lumen inconsistency identified in this objection.

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 site-lighting scheme within which the illuminated totem would sit. That reinforces the need for specific, enforceable dimming and night-time luminance controls for the totem itself.

e) Colour temperature

The scheme is specified at 2700 K. The applicant's Preliminary Ecological Appraisal sought a warm-white spectrum "ideally below 2700 K". The proposed lighting therefore sits at the top of that stated ecological preference rather than below it.

f) Preliminary and unverified

The Proposed Lighting Layout is marked "PROPOSAL (NOT FOR CONSTRUCTION)". The LiAS Design Notes record that Signify has not visited the site, that column and luminaire locations are indicative and subject to verification, and that the design does not account for obstructions such as trees. The lighting evidence is therefore preliminary and unverified. It is not a sound basis for concluding that the cumulative night-time environment would be acceptable, particularly for elevated residential receptors at Elder.

Wider external lighting inconsistency

The unresolved 8,000-versus-20,000-lumen discrepancy matters because the proposed totem would be experienced within the wider night-time lighting environment, not in isolation. If that baseline is not consistently specified, the Council cannot confidently assess the cumulative effect on residential amenity or public safety.

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 material does not demonstrate how the proposed totem would sit within a final lighting strategy that complies with those requirements. In particular, the relationship between the totem, wider site lighting, boundary habitats, retained trees and any bat-box locations has not been clearly assessed through a consolidated lux spill plan.

Ecological impact is principally a determining consideration for the main planning application rather than for this advertisement consent. However, the ecological lighting conflict is relevant here because it reinforces the need for strict control over luminance, colour temperature, light spill, dimming and hours of illumination.

Illuminated faces

The Drive Totem schedule, drawing 9045-SA-2029-P022 Rev F, confirms that the totem would carry internally illuminated Golden Arches to both sides, together with an internally illuminated "Drive Thru" appendage.

The totem would therefore remain an illuminated double-sided advertisement within the frontage environment. Its orientation, visible faces and sightline relationship to Elder should be verified before consent is granted.

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

Cumulative signage impact

Across PL/2026/03702, PL/2026/03737 and PL/2026/03738, the proposed signage package would include the 8-metre totem, building-mounted illuminated signs, drive-through lettering, digital displays, Play Land signage, a banner unit and numerous operational signs.

The totem should therefore not be assessed as an isolated advertisement. 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 the totem should not be granted unless the Council has assessed the cumulative advertisement impact across all three signage applications.

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) foodstore 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 foodstore, 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 proposed 8-metre illuminated totem has been properly assessed against the cumulative night-time lighting, visual-amenity and driver-distraction context of this corridor.

11. 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 height, illumination and proximity of the totem to

residential property 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 totem is not a low-level or incidental sign. It is an 8-metre internally illuminated structure close to homes and beside a sensitive roundabout. If consent were granted, the Council should impose an express condition requiring the sign and its supporting structure to be removed at the end of the express consent period unless further express consent has first been granted.

12. Relationship with the main application

Advertisement effects depend on the main use

Although need is not a separate advertisement-control test, the totem's relationship with the main application is relevant. The amenity and public-safety effects of the proposed 8-metre illuminated totem would be introduced solely 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 8-metre totem 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 totem would no longer serve an approved operational use on the site. It would instead leave a large illuminated commercial advertisement close to homes and beside the A361/Horton Road roundabout, with continuing potential for visual intrusion, light spill and driver distraction.

Need for linkage condition

Consent should therefore be refused unless the Council is satisfied that the advertisement meets 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 sign and supporting structure must be removed 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 Hilpert decision determines this advertisement application, nor that its refusal reasons were advertisement grounds. The narrower point is that the restaurant use which this totem is intended to serve is not a foregone conclusion. It would therefore be premature to grant free-standing consent for a tall, illuminated totem unless its display, illumination and retention are strictly tied to the lawful implementation and continuing operation of the associated restaurant and drive-through.

13. Requested outcome

Further information before determination

Before granting advertisement consent, the Council should require precise confirmation of the totem's siting, orientation, luminance, night-time luminance, dimming arrangements, hours of illumination and visibility from:

- Elder and other nearby homes;
- first-floor residential windows facing the site;
- each approach to the A361/Horton Road roundabout; and
- the proposed site access and relevant highway signage.

The Council should also require verified sightline sections and, where relevant, lux calculations for first-floor residential receptors at Elder and the neighbouring London Road frontage homes.

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

Primary request

I respectfully request that Wiltshire Council refuses advertisement consent for PL/2026/03737.

Fallback conditions if consent is granted

If the Council is minded to grant consent, the illumination controls identified in Section 8 should be imposed as enforceable conditions.

In addition, any consent should require:

- no illumination outside the approved trading hours of the associated restaurant and drive-through, with the totem switched off whenever that use is closed to customers;
- compliance with the applicant's Preliminary Ecological Appraisal lighting requirements, including colour temperature not exceeding 2,700 Kelvin, peak wavelengths above 550nm, no direct illumination of boundary habitats, retained trees or bat-box locations, and ecologist-reviewed lux contour assessment where relevant;
- removal of the sign and its supporting structure if the associated restaurant and drive-through use is not implemented or permanently ceases to operate, by express condition given the potential effect of Class 14 deemed consent;

- confirmation by the Council of the correct environmental zone before luminance limits are approved;
- automatic dimming linked to ambient light levels, with a substantially lower enforceable night-time luminance limit; and
- ongoing maintenance so that the sign does not cause glare, light spill, excessive brightness, visual distraction or deterioration in appearance.

These conditions are a fallback only. They should not be read as diluting the primary objection or as acceptance that an 8-metre internally illuminated totem can be made acceptable in this location.

Affected residents should be given an opportunity to comment on any amended totem details before determination.

My primary position remains that advertisement consent should be refused.

14. Conclusion

The proposed 8-metre internally illuminated totem is excessive in this location. It would be visually prominent, harmful to residential amenity and capable of adding to driver distraction in a sensitive highway setting beside the A361/Horton Road roundabout.

The applicant's scaled PDF drawings indicate that the totem would stand approximately 25–30 metres from the nearest visible part of Elder's residential façade. That proximity is particularly significant because the sign would be visible in close relationship with first-floor bedroom accommodation in regular night-time use, above the level at which the proposed ground-level fencing could provide meaningful protection.

The totem should not be assessed in isolation. It would form part of a wider illuminated 24-hour drive-through environment, together with the main restaurant proposal and the linked signage applications. Its height, luminance, siting and visibility would cause unacceptable harm to residential amenity and raise public-safety concerns at the roundabout.

For those reasons, assessed on the statutory advertisement grounds of amenity and public safety, I ask Wiltshire Council to refuse advertisement consent for PL/2026/03737.

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/2026/03737 be determined by Planning Committee rather than under delegated powers, and considered alongside the related applications.