

Wiltshire County Council

Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
Gloucester
GL1 2TG

28 May 2026
Your ref: PL/2026/02097
Ask for: Charlotte Chambers

Dear James Webster

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Redevelopment of ancillary barn and function building,
together with works to the public house, to provide spa
and gym facilities in association with the pub's enhanced
attraction
LOCATION: The Holford Arms Knockdown Tetbury GL8 8QY
APPLICANT: Tetbury Leisure Ltd

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application is **refused**.

Recommendation

1. The Local Highway Authority (LHA) raises a holding objection to the application as insufficient information has been submitted to demonstrate that the development would not have an unacceptable impact on the safe and efficient operation of the highway network. This objection may be reconsidered upon submission of satisfactory additional information and amended plans.

Site Context and Access

2. The site is located within Wiltshire; however, access is taken from the A433 which is maintained within Gloucestershire. The A433 is a classified A-road subject to a 40mph speed limit, and therefore a high standard of access design and operation is required in the interests of highway safety.

Traffic Impact and Trip Generation

3. The proposal introduces additional leisure uses in the form of spa and gym facilities, which are likely to increase vehicle trips to and from the site over and above the lawful use of the public house. Notwithstanding this, the application is not supported by a Transport Statement or any robust transport assessment.

4. In particular, the submission does not provide baseline vehicle movements associated with the existing use, nor a forecast of trips associated with the proposed development. There is also no information relating to staffing levels, shift patterns or peak operational periods. In the absence of this information, the LHA is unable to quantify the development's impact on the local highway network.

5. The applicant must provide a Transport Statement supported by evidence-based trip rate analysis derived from the TRICS database. This should include justification of the selected comparable sites, an assessment of combined existing and proposed trip generation, and identification of peak hours and network impacts.

Parking Provision and Accumulation

6. The Proposed Site Plan indicates provision of 16 parking spaces intended to serve both the existing public house and the proposed additional facilities. No justification or supporting assessment has been provided to demonstrate that this level of parking is adequate.

7. The LHA considers that the intensification of use is likely to increase parking demand beyond that which is proposed. In the absence of a parking accumulation assessment, there is a significant risk that vehicles will overspill onto the adjacent highway.

8. Such overspill parking on the A433 would be detrimental to highway safety, resulting in obstruction of the carriageway, reduced visibility and potential conflict between road users.

9. The applicant is therefore required to submit a robust parking accumulation assessment which demonstrates that sufficient parking provision is available to accommodate both existing and proposed uses during peak periods.

Internal Layout and Manoeuvring

10. The submitted layout shows three parking spaces located adjacent to the access with limited manoeuvring space of approximately 3.6 metres behind the bays. The LHA considers that this arrangement does not provide sufficient space for vehicles to manoeuvre safely.

11. It is unlikely that vehicles using these spaces would be able to enter and exit in a forward gear. Given the direct access onto a 40mph A-class road, this is not acceptable in highway safety terms.

12. Amended plans are required to demonstrate that all vehicles can enter and leave the site in a forward gear, with adequate turning space provided within the site.

Access Surface Treatment

13. The submitted details relating to the access surface treatment are not compliant with the Manual for Gloucestershire Streets. The guidance requires that the first 5 metres from the carriageway edge be constructed in a bound, permeable hardstanding material.

14. The current proposals indicate a gravel surface with a cobbled threshold, which would not prevent the migration of loose material onto the highway or the discharge of debris into highway drainage systems.

15. Revised details are required demonstrating a compliant bound permeable surface for the first 5 metres of the access.

Sustainable Transport and Off-Site Mitigation

16. Notwithstanding the above concerns, the LHA advises that the proposed development is likely to necessitate off-site highway mitigation measures as a result of increased demand. In particular, improvements to the nearby bus stops would be required to support sustainable travel.

17. This would involve the provision of formalised bus stops in both directions, including accessible hardstanding boarding areas, kerbing, clearways, posts and solar lighting. The estimated cost of these works is £20,400, which would need to be secured through an appropriate legal agreement. This comprises:

-£12,000- Hardstanding provision

-£2,000- Clearways

-£400- Bus stop posts/flags

-£1,000- Solar lighting

-£5,000- Traffic management

Conclusion

18. The LHA cannot be satisfied that the development would not result in a severe impact on the highway network, nor that it provides safe and suitable access, adequate parking or policy-compliant design.

19. For these reasons, the LHA raises a holding objection, which may be withdrawn upon receipt of a satisfactory Transport Statement including TRICS analysis, a parking accumulation assessment, amended layout plans addressing manoeuvring and surfacing requirements, and agreement in principle to the required off-site contributions.

The Highway Authority has undertaken an assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would be an [unacceptable impact on Highway Safety/severe impact/conflict with provide safe and suitable access for all users] and therefore recommends that this application is refused.

Yours Sincerely

Charlotte Chambers
Technician