

To:

James Webster
Wiltshire County Council

Highways Development Management
Shire Hall
Westgate Street
Gloucester
GL1 2TG

Email: developmentcoordinationhdm@gloucestershire.gov.uk

Please ask for: CC

Our Ref: WI/2026/060315

Your Ref: PL/2026/02097-1

Date: 20 July 2026

Dear James Webster

**The Town and Country Planning (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, makes the following comments.

Recommendation: Objection

The applicant proposes the redevelopment of an ancillary barn and function building, together with alterations to the existing public house, to provide spa and gym facilities associated with the operation of the site. The Local Highway Authority (LHA) has reviewed the additional information submitted in support of the application.



The submitted details fail to address the concerns raised within the LHA's previous consultation response and the information necessary to assess the highway impacts of the development remains outstanding. Accordingly, the LHA objects to the proposal for the reasons set out below.

Site Context and Access

The application site is located within Wiltshire; however, access is taken directly from the A433 which is maintained by Gloucestershire Highway Authority.

The A433 forms part of the Principal Road Network (PRN) and performs an important strategic transport function, providing a key route between Bath and Cirencester whilst accommodating local, commuter and longer-distance traffic movements. As a classified A-road subject to a 40mph speed limit, it serves an important movement function and its safe and efficient operation should not be compromised by inappropriate access arrangements or development-related traffic impacts.

Consequently, development proposals accessing onto the A433 are required to demonstrate a high standard of highway design and operation, ensuring that highway safety is maintained and that the efficient operation of this strategically important route is not adversely affected.

Traffic Impact and Trip Generation

The proposal would introduce additional leisure uses in the form of spa and gym facilities which are likely to generate vehicle trips over and above those associated with the lawful operation of the existing public house.

Notwithstanding the concerns previously raised by the LHA, the applicant has not submitted a Transport Statement, Transport Assessment, or any evidence-based assessment of trip generation. The submitted information continues to omit baseline traffic movements associated with the existing use, doesn't forecast traffic associated with the proposed development, fails to detail staffing levels and shift patterns, provides no details of operational characteristics and peak demand periods and most fundamentally, provides no assessment of the impact of the development upon the local highway network.

In the absence of this information, the LHA remains unable to quantify the transport impacts arising from the proposal or determine whether the development would have an unacceptable impact upon the safe and efficient operation of the highway network.

The applicant should provide a Transport Statement supported by evidence-based trip rate analysis derived from the TRICS database. This should include justification of selected comparator sites, assessment of



existing and proposed trip generation, and identification of peak operational periods and associated network impacts.

Until such information has been provided, the LHA cannot be satisfied that the proposal would not adversely affect the operation of the A433 Principal Road Network corridor.

Parking Provision and Accumulation

The proposed development relies upon a shared parking provision intended to serve both the existing public house and the proposed spa and gym facilities.

The applicant has not submitted any evidence demonstrating that the proposed level of parking provision is sufficient to accommodate the cumulative parking demand arising from these uses.

The LHA previously advised that the intensification of activity associated with the development is likely to increase parking demand beyond that which currently exists. Despite this, no parking accumulation assessment or equivalent assessment has been provided.

Given the mixed-use nature of the proposal and the shared parking arrangements proposed, a parking accumulation assessment is necessary to demonstrate that sufficient parking capacity exists throughout peak operational periods.

In the absence of such information, the LHA cannot be satisfied that parking demand generated by the development can be adequately accommodated within the site. This raises a significant risk of overspill parking occurring on the adjacent highway network.

Any overspill parking associated with the development would be particularly concerning given the site's direct relationship with the A433. Vehicles parking on or adjacent to this strategically important route could adversely affect visibility, obstruct the carriageway and increase conflict between road users, thereby creating conditions detrimental to highway safety.

Internal Layout and Manoeuvring

The LHA previously identified concerns regarding the three parking spaces located immediately adjacent to the site access, where only limited manoeuvring space is available behind the parking bays.

The applicant has now submitted a revised Car Park Plan; however, these parking spaces remain in the same location and the revised plans do not demonstrate that vehicles can enter and leave the spaces in a forward gear.



The LHA considers it likely that vehicles occupying these spaces would either be required to reverse into the spaces directly from the A433 or reverse out of the spaces onto the A433 due to the lack of space between the highway and the parking spaces.

Given the site's direct access onto a 40mph Principal Road Network route serving an important strategic movement function between Bath and Cirencester, such manoeuvres are unacceptable in highway safety terms.

Reversing manoeuvres onto or from the A433 would introduce unnecessary conflict between vehicles entering and leaving the site and through traffic travelling along this strategic corridor. Such manoeuvres have the potential to prejudice both highway safety and the efficient operation of the wider highway network. The submitted layout therefore fails to demonstrate a safe and suitable access arrangement.

Amended plans are required to demonstrate that all vehicles can manoeuvre within the site and enter and leave the development in a forward gear.

Access Surface Treatment

The LHA previously advised that the submitted details relating to the site access did not accord with the requirements of the Manual for Gloucestershire Streets (MfGS).

MfGS requires that the first 5 metres of an access measured from the carriageway edge should comprise a bound permeable hardstanding material capable of preventing the migration of loose material onto the public highway.

Whilst the submitted Car Park Plan appears to indicate an access incorporating a tar and chip surface and a cobbled threshold treatment, insufficient information has been provided to confirm that the first 5 metres of the access comprises a bound permeable hardstanding material compliant with MfGS requirements.

Further clarification and supporting construction details are therefore required.

Sustainable Transport and Off-Site Mitigation

The LHA has previously advised the applicant that the development is likely to necessitate off-site highway mitigation measures as a consequence of increased visitor and staff movements associated with the proposal.

In particular, improvements to nearby bus stop infrastructure would be required to support sustainable travel opportunities and improve accessibility to the site.

These works are anticipated to comprise formalised bus stop facilities in both directions, including:



- Accessible hardstanding boarding areas;
- Kerbing improvements;
- Bus stop clearways;
- Bus stop poles and flags;
- Solar lighting; and associated traffic management measures.

The estimated cost of these works is £20,400 and would need to be secured through an appropriate legal agreement.

This comprises:

- £12,000 – Hardstanding provision;
- £2,000 – Clearways;
- £400 – Bus stop poles and flags;
- £1,000 – Solar lighting; and £5,000 – Traffic management.

Conclusion

The additional information submitted in support of the application has failed to address the substantive highway concerns previously raised by the Local Highway Authority.

In particular, the applicant has failed to provide:

- A Transport Statement supported by TRICS analysis;
- Evidence demonstrating that the proposed parking provision is sufficient to accommodate demand generated by the development;
- A parking accumulation assessment;
- A layout demonstrating that all vehicles can safely enter and leave the site in a forward gear;
- Sufficient information demonstrating compliance with the Manual for Gloucestershire Streets; and Agreement in principle to the required off-site mitigation measures.



Consequently, the LHA remains unable to conclude that the development would provide a safe and suitable means of access for all users or that the transport impacts of the proposal would be acceptable.

Given the site's direct access onto the A433 Principal Road Network route, which performs an important strategic function linking Bath and Cirencester, the absence of sufficient evidence to assess traffic generation, parking demand and safe vehicle manoeuvring is of particular concern.

The applicant has therefore failed to demonstrate that the proposal would not adversely affect highway safety or the efficient operation of the highway network.

Yours sincerely,

CC
Technician

