

**To:**

Isobella Wise  
Wiltshire County Council

Highways Development Management  
Shire Hall  
Westgate Street  
Gloucester  
GL1 2TG

**Email:** developmentcoordinationhdm@gloucestershire.gov.uk

**Please ask for:** CH

**Our Ref:** WI/2026/060235

**Your Ref:** PL/2026/03708

**Date:** 15 July 2026

Dear Isobella Wise

**The Town and Country Planning (Development Management Procedure) (England)  
Order 2015 | Article 18 Consultation with Highway Authority**

**Proposal:** Conversion and alteration of existing dwelling to ancillary accommodation and erection of replacement/self-build dwelling together with associated ancillary development  
**Location:** Knockdown Farm Knockdown Tetbury GL8 8QY  
**Applicant:** Mr & Mrs E Shelton

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.

The applicant seeks permission for the conversion and alteration of the existing dwelling to ancillary accommodation and the erection of a replacement self-build dwelling together with associated ancillary development. Having reviewed the submitted information, the Local Highway Authority recommends that the application be deferred pending the submission of further information to enable a full assessment of the proposed access arrangements.



The site is located adjacent to the A433 within the rural settlement of Knockdown. The surrounding highway environment is characterised by the absence of formal footways and street lighting, with limited opportunities for travel by sustainable modes. Whilst bus stops are located within walking distance of the site, pedestrian connectivity is constrained by the nature of the surrounding highway network. As such, future occupiers are likely to rely predominantly on the private motor car for day-to-day journeys.

Notwithstanding the above, the proposal relates to an existing residential site and does not introduce an additional independent dwelling. Whilst the replacement dwelling is larger than the existing dwelling and ancillary accommodation is proposed within the retained building, the Highway Authority does not consider that the proposal would give rise to a level of additional trip generation that would justify an objection in principle. The Highway Authority's assessment is therefore focused on whether the site can be safely accessed.

The submitted plans indicate that both existing accesses are to be retained, with the western access serving the residential element of the development and the eastern access continuing to serve the agricultural and equestrian activities associated with the site. The proposed access widths are considered acceptable. However, the submitted drawings do not provide sufficient detail regarding the operation of the proposed gates nor their relationship with the public highway. In accordance with Manual for Gloucestershire Streets, access gates should be positioned a minimum of 5 metres behind the carriageway edge and should open inwards or operate as sliding gates. Amended plans should therefore be submitted demonstrating compliance with these requirements.

Similarly, no details have been provided regarding the proposed surfacing of the access. The Highway Authority requires the first 5 metres behind the carriageway edge to be constructed in a bound permeable material to prevent loose material being deposited onto the public highway and to ensure that surface water does not drain onto the carriageway. This detail should also be incorporated into any amended plans.

The principal concern relates to visibility at the western access. The proposed development would rely upon this access to serve the replacement dwelling, yet no visibility assessment has been submitted in support of the application. The access is situated close to the change in speed limit between the 40mph and 50mph sections of the A433. Furthermore, available speed data held by the Highway Authority indicates vehicle speeds in excess of the posted 40mph speed limit in the vicinity of the site. Given the location of the access and the likelihood that drivers are accelerating towards the higher speed environment, reliance on the posted speed limit alone would not provide an appropriate basis on which to assess visibility requirements.



The Highway Authority therefore requires the applicant to undertake a 7-day Automatic Traffic Counter survey in order to establish prevailing 85th percentile vehicle speeds on the A433 adjacent to the site. Following completion of the survey, visibility splay drawings should be submitted demonstrating that appropriate visibility can be achieved and maintained in both directions based upon the recorded speeds and the guidance contained within Manual for Streets. The submitted information should also demonstrate that any required visibility splays can be provided within land under the applicant's control and/or the public highway and can be maintained free from obstruction in perpetuity.

The site layout appears capable of accommodating the proposed parking provision and sufficient space appears to exist to enable vehicles to turn within the site and leave in a forward gear. However, no evidence has been provided to demonstrate that emergency service vehicles can adequately access and manoeuvre within the site. The Highway Authority therefore requests details demonstrating compliance with the access requirements of Approved Document B, including confirmation that a fire appliance can obtain access to the required proximity of the dwelling and can safely enter and leave the site.

In the absence of the above information, the Highway Authority is unable to reach a fully informed conclusion regarding the suitability of the proposed access arrangements and their implications for highway safety.

Consequently, the Highway Authority recommends that the application be deferred pending submission of a speed survey, visibility assessment and amended access details for further consideration.

Yours sincerely,

CH  
Technician

