

To:

James Webster
Wiltshire County Council

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Please ask for: CC

Our Ref: WI/2026/060583-2

Your Ref: PL/2026/02097

Date: 20 August 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.

The applicant is proposing the redevelopment of an ancillary barn and function building, together with works to the public house, to provide spa and gym facilities in association with the pubs enhanced attraction. The Local Highway Authority (LHA) has reviewed the submitted information, recommends that the application be deferred, and provides the following comments.



Site context and access

The application site is located within Wiltshire. However, access to the public house is taken via the A433 which is maintained by Gloucestershire Highway Authority.

The A433 forms part of the Principal Road Network (PRN) and is a strategically important classified A-road which performs a key movement function within the county and wider region. The route provides an important connection between Bath and Cirencester and accommodates a broad range of traffic movements, including local, commuter, commercial and longer-distance journeys. As such, the efficient operation of the corridor is essential to the movement of people and goods, and it is important that development does not introduce conditions which would compromise highway safety, reduce network efficiency, increase delay, or result in inappropriate manoeuvring or congestion on the highway. Particular regard must therefore be given to ensuring that the site's access arrangements and operational characteristics can safely accommodate all anticipated vehicle movements without adversely affecting the function of the A433.

The applicant has submitted a 'Transport Statement' which the LHA has reviewed. The applicant states that the site benefits from two existing accesses leading to two existing car parking areas, one taken via the A433, and the second taken from unnamed lane adjacent to the site.

Traffic impact and trip generation

The LHA previously stated that additional information was required in regard to the operational requirements of both the existing and proposed development. Additionally, the LHA requested that the applicant provide an evidence-based trip rate analysis derived from the TRICS database.

The applicant's submitted transport statement states that given the highly mixed-use nature the existing operation, together with the absence of any increase in accommodation or event capacity, it is considered difficult to identify a suitable standalone TRICS land use that would reliably represent either the existing operation or the proposed development. In these circumstances, a comparative assessment of the existing and proposed operation is considered to provide a more robust and representative assessment of likely transport effects. The LHA is satisfied with this approach.

The applicant states that the site currently employs 16 members of staff, to of whom reside on site. The proposed spa would require one additional staff member, increasing the total number of staff employed to 17.

The spa:



The applicant states that the spa would not operate concurrently with the wedding or any other events which may be taking place in the function barn. The spa is intended primarily for the use of guests staying at the Holford Arms, with available booking slots also being offered to member of the public. The spa would accommodate a maximum of 12 guests at any one time and operate on a booking basis with two-hour time slots available between 8:00-20:00.

The camping facilities, bell tents, and guest rooms and internal pub covers:

The site currently has 11 guest rooms/chalets, 31 camping pitches, 4 tents, and 30 internal pub covers. The applicant is not proposing an increase to these facilities.

The function barn:

The site currently benefits from a function barn, which can accommodate weddings and up to 160 guests, the applicant does not propose any changes to this.

The applicant has provided comparative information relating to the existing and proposed uses of the site. However, the submitted information does not adequately demonstrate the maximum potential occupancy of the development, nor does it assess the cumulative transport and parking impacts that may arise when all elements of the site are operating concurrently. In particular, no evidence has been provided to demonstrate that the local highway network can accommodate the combined demand associated with the proposed spa, restaurant, camping pitches, guest rooms, chalets and function room operating at the same time.

Whilst comparative figures have been provided, the applicant has not supplied sufficient operational data to enable the LHA to understand how the development will function in practice. For example, no information has been provided regarding the typical occupancy rates of the proposed chalet accommodation, how many chalet rooms are likely to be occupied at any one time, the average number of vehicles associated with each camping pitch, or the likely utilisation of the guest rooms and restaurant during peak periods. Without this information, the LHA is unable to verify the level of parking demand likely to be generated by the development.

Furthermore, whilst the function room is stated to accommodate up to 160 wedding guests, insufficient information has been provided regarding its operational characteristics. The applicant has not detailed staffing levels and shift patterns, delivery and servicing arrangements associated with weddings and events, or the expected arrival and departure profiles of guests. The relationship between wedding events and the operation of the wider site has therefore not been fully assessed.

Similar concerns apply to the proposed spa facility. Whilst it is stated that the spa could accommodate up to 12 guests, the applicant has indicated that it may be operated by a single member of staff. No explanation has been provided as to how the facility would operate in practice, how one member of staff would manage a facility accommodating up to 12 guests, whether additional staff would be required during peak periods, or



what the overall staffing and operational requirements of the spa would be. As a result, the LHA is unable to understand how the proposed facility would function on a day-to-day basis or the level of vehicle trips that it may generate.

The LHA therefore requires further information regarding the operational requirements of the development, including staffing levels, staffing shift patterns, delivery and servicing arrangements, anticipated occupancy rates, vehicle ownership assumptions, and any other information necessary to establish the maximum likely site occupancy and associated vehicle demand. Until such information is provided, the LHA is unable to conclude that all elements of the development can operate concurrently without resulting in an unacceptable impact on parking demand or the safe and efficient operation of the local highway network.

The National Planning Policy Framework(NPPF) August 2026 requires consideration of the transport impacts of development across all reasonable future scenarios and confirms that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. In this instance, insufficient information has been provided regarding the operational characteristics of the development, including site occupancy, staffing levels, parking demand, servicing requirements, event operations and vehicle trip generation. As a result, the Local Highway Authority is unable to robustly assess the likely transport impacts arising from the development, including the cumulative effects of all elements operating concurrently, or determine whether the proposal would result in an unacceptable impact on highway safety or the safe and efficient operation of the highway network. Accordingly, further evidence is required before a fully informed assessment can be undertaken.

The applicant has stated that the proposed spa would not operate concurrently with wedding and event functions. If this assumption forms part of the assessment, further information should be provided explaining how this would operate in practice and how it would be managed.

Proposed car parking quantum

The applicant's Transport Statement states that there are two existing car parking areas which serves the site, one located at the front of the development, accessed via the A433, and one at the rear, accessed via an unnamed road. The applicant states that the site benefits from approximately 60 car parking spaces distributed across the wider site.

The LHA acknowledges that the site already accommodates a mix of uses and that the applicant is likely to have a good understanding of the site's operational requirements. However, no evidence has been provided to demonstrate that the proposed provision of 60 parking spaces would be sufficient to accommodate the parking demand generated by the development without resulting in overspill parking onto the local highway network. This is of particular concern given the site's frontage onto the A433, which is publicly maintainable highway, a classified A-road, subject to a 40mph speed limit and accommodating significant traffic flows. The



applicant should therefore provide a car parking accumulation assessment which considers the worst-case operational scenario, including when the spa, restaurant, camping pitches, guest accommodation, chalets and function room are operating concurrently. The assessment should be informed by robust occupancy data and operational assumptions, including anticipated car-sharing rates and the typical number of vehicles associated with each element of the development. For example, the applicant should demonstrate the likely number of vehicles associated with each camping pitch, guest accommodation occupancy rates, staffing demand, and event attendance. This information is necessary to demonstrate that the proposed parking provision is sufficient and that the development would not result in an unacceptable impact on the safe and efficient operation of the local highway network.

Furthermore, the LHA has identified an apparent inconsistency in the submitted information regarding the level of parking provision proposed. Whilst the application documentation states that a total of 60 parking spaces are proposed, the submitted drawings appear to indicate a total provision of approximately 55 spaces. The applicant should clarify the total number of parking spaces proposed and ensure that all submitted plans and supporting documents are consistent. In the absence of this clarification, the LHA is unable to verify the adequacy of the proposed parking provision.

Proposed front car parking/access arrangements

The applicant's submitted Car Park Plan indicates parking bays measuring 2.4m x 4.8m, which accords with the dimensions set out within Manual for Gloucestershire Streets (MfGS), and the LHA raises no concerns in this regard. However, the internal manoeuvring aisles appear constrained, measuring approximately 5.5m in width. The LHA is concerned that this may not provide sufficient space for vehicles to safely manoeuvre into and out of parking spaces, particularly where vehicles are parked in adjacent bays, and may result in vehicles being unable to enter and leave parking spaces in a single manoeuvre or exit the site in a forward gear. The applicant should provide swept path analysis which indicates that vehicles can:

- Enter and leave parking spaces safely;
- Manoeuvre within the site without conflict with adjacent parked vehicles;
- Access and leave both parking areas safely;
- Turn within the site where necessary; and
- Avoid inappropriate manoeuvres associated with the adjacent highway network.

In respect of the proposed rear car park, the applicant has not submitted any detailed drawings showing the layout, geometry or dimensions of the parking area. From the information provided, the LHA has identified that the parking bay dimensions, access widths and manoeuvring aisles appear constrained. However, in the absence of a scaled and fully dimensioned drawing, the LHA is unable to undertake a robust assessment of the proposed arrangement. The applicant is therefore requested to submit a detailed car park layout for the rear parking area, including all relevant dimensions and drawn to an appropriate scale, to enable the LHA to assess the adequacy of the proposed parking provision, manoeuvring space and access arrangements.



The applicant's submitted drawing ref 101.3 named 'Holford Arms- Front Entrance' indicates 16 proposed car parking spaces. The LHA has previously identified concerns in regard to the three proposed car parking spaces located directly adjacent to the A433. This has not been addressed, vehicles would be required to reverse out of spaces into the A433, this is considered an unacceptable highway safety risk.

The applicant also proposes a threshold of clay pavers between the public highway and their gravel car park. However, this is not 5m wide. To prevent loose debris from being discharged into the public highway and giving rise to a skid risk, the first 5m minimum should be constructed in a bound to hard standing permeable material to act as a threshold.

Vehicle tracking analysis

The submitted information provides limited detail regarding servicing requirements associated with the development.

The applicant should provide details regarding servicing arrangements, including deliveries, refuse collection and operational servicing requirements associated with the hospitality, accommodation, spa and event uses.

The applicant should also provide swept path analysis demonstrating how servicing, refuse and emergency vehicles can safely access, manoeuvre within and exit the site without reliance on the public highway for turning movements.

Pedestrian environment and accessibility

Whilst the applicant places some reliance on the accessibility of the site by bus and the availability of nearby bus stops, little assessment has been provided of the pedestrian environment. Considering the connectivity score of 20; the LHA notes that the site is located in a rural area and is not served by continuous footways, street lighting, or other dedicated pedestrian infrastructure in the vicinity of the site. As a result, opportunities for safe and attractive pedestrian movements are limited, particularly during hours of darkness, and future users are likely to remain heavily reliant on private motor vehicles. The applicant should therefore provide a more comprehensive assessment of the pedestrian environment and demonstrate how users of the development would safely access public transport facilities on foot.

Conclusion

The LHA acknowledges the additional information submitted by the applicant and accepts the principle of assessing the proposal through a comparative review of the existing and proposed operation of the site.



However, the applicant has not yet demonstrated:

- The maximum likely occupancy of the site;
- The parking demand associated with all site uses operating together;
- That sufficient parking provision is available;
- That the proposed car park layouts can operate safely and effectively;
- That servicing, refuse and emergency vehicle movements can be safely accommodated; or that the proposed development would not adversely affect the safe and efficient operation of the A433.

The LHA notes that the site comprises a complex mix of uses including a public house, restaurant, guest accommodation, camping facilities, bell tents, wedding and event facilities, and the proposed spa. Without a robust assessment of site occupancy, vehicle demand and parking accumulation, the LHA is unable to establish whether all elements of the development can operate simultaneously without creating parking stress, unsafe vehicle manoeuvres, overspill parking, or operational impacts affecting the A433.

Similarly, in the absence of detailed parking layouts and swept path analysis, the LHA cannot conclude that vehicles, servicing vehicles, refuse vehicles and emergency vehicles can safely manoeuvre within the site. Particular concern remains regarding the proposed parking spaces adjacent to the A433, where the applicant has not demonstrated that parking manoeuvres can occur without detriment to highway safety.

Consequently, the LHA is unable to conclude that the proposal would not result in an unacceptable impact on highway safety or the safe and efficient operation of the highway network.

Should the applicant be unable to satisfactorily address the matters identified above, the Local Highway Authority is likely to maintain an objection to the proposal.

Accordingly, the LHA recommends that the application be deferred pending submission of the additional information requested.

Yours sincerely,

CC
Technician

