

THE HOLFORD ARMS, KNOCKDOWN, TETBURY

TECHNICAL NOTE 1: RESPONSE TO HIGHWAY AUTHORITY COMMENTS

1 Introduction

- 1.1 Condon Transport Ltd has been instructed by Tetbury Leisure Ltd to prepare this Technical Note in support of planning application PL/2026/02097 at The Holford Arms, Knockdown.
- 1.2 The planning application seeks permission for the redevelopment of an ancillary barn and function building, together with works to the public house, to provide spa and gym facilities associated with the existing hospitality and tourism operation.
- 1.3 A Transport Statement (TS) was prepared by Condon Transport Ltd and submitted in July 2026. The TS assessed the proposals by comparing the site's existing lawful and established operations with the proposed development. This approach reflected the mixed nature of the existing operation and the absence of any proposed increase in guest accommodation or event capacity.
- 1.4 Subsequent highway consultation responses have been received from Wiltshire Council (WC), dated 16 July 2026, and Gloucestershire County Council (GCC), dated 20 August 2026. GCC has confirmed that it is satisfied with the comparative assessment approach adopted within the TS.
- 1.5 This Technical Note therefore provides further operational clarification in response to the matters raised by the two Highway Authorities. It should be read alongside the submitted TS rather than as a replacement for that document.
- 1.6 Since submission of the TS, the applicant has reviewed the proposals and confirmed that the previously proposed front porch will be omitted from the application. The associated alterations to the front forecourt and parking area are consequently no longer required and will also be omitted. The existing forecourt, including its established parking, access arrangements, and operational space, will therefore be retained without alteration.

2 Highway Authority Consultation Responses

- 2.1 Highway consultation responses have been received from both WC and GCC following submission of the Transport Statement (TS). Although both authorities have considered the same planning application and Transport Statement, the scope of the matters raised differs.

Wiltshire Council

- 2.2 WC notes that there are no proposals to alter either of the existing highway accesses and that the existing parking provision would remain unchanged. It also recognises that the public house operation would not materially alter traffic generation and that the extension to the function building is offset by the removal of existing covered event space.
- 2.3 WC identifies the proposed spa as the principal additional traffic-generating element of the development. It also acknowledges that the spa is intended primarily for existing guests and would not operate concurrently with large-scale wedding or function events. On this basis, WC indicates that it would not have concerns regarding overspill parking, subject to appropriate control of the operation of the spa and function space.
- 2.4 The principal clarification requested by WC relates to the parking arrangements for the camping use and the basis of the 84-person non-function occupancy figure referred to within the Transport Statement:
- 2.5 WC's response therefore focuses principally upon the additional transport implications of the development now proposed and seeks limited clarification in respect of matters relevant to that assessment. It does not seek a reassessment of the established operation of the wider site.

Gloucestershire County Council

- 2.6 GCC similarly accepts the principle of assessing the application by comparing the existing and proposed operation of the site, rather than through a standalone TRICS assessment. GCC also acknowledges that the existing guest accommodation, camping facilities, bell tents and pub capacity are unchanged, and that the function barn already operates with a capacity of up to 160 guests.
- 2.7 GCC nevertheless requests a wider range of additional information, including:
- maximum site occupancy and parking demand with all elements operating concurrently;
 - occupancy and vehicle assumptions for the existing accommodation and camping uses;
 - staffing, servicing and arrival/departure information for the existing function operation;
 - further details of the proposed spa operation and staffing;
 - a formal parking accumulation assessment;

- clarification of the overall parking provision;
 - detailed parking layouts and swept path analysis for the front and rear parking areas;
 - servicing, refuse and emergency vehicle tracking; and
 - further assessment of pedestrian accessibility and access to public transport.
- 2.8 A significant proportion of the information requested by GCC relates to established elements of the site's operation which are not proposed to change as part of the current application. This includes the existing accommodation, camping, function operation, rear parking area, servicing arrangements and aspects of the site's existing accessibility. The scope of the GCC request is therefore substantially wider than the incremental transport effects arising from the development now proposed.
- 2.9 This contrasts with the approach taken by WC, which has considered the same planning application and Transport Statement and has focused its response upon the additional effects of the proposed spa and the limited operational clarifications necessary to understand those effects.
- 2.10 GCC also raised specific concerns regarding the proposed alterations to the front forecourt and parking area, including the manoeuvring space available within the proposed layout and the parking spaces shown adjacent to the A433.
- 2.11 The proposed alterations to the front forecourt were associated with wider changes to the frontage of the public house, including the previously proposed front porch. The front porch has subsequently been omitted from the application and, consequently, the associated alterations to the front forecourt are no longer required.
- 2.12 As a result, the proposed forecourt alterations have therefore also been omitted from the application. The existing front forecourt and parking area will be retained in its current form and will continue to operate as existing. Accordingly, no alterations are now proposed to the established parking or vehicle manoeuvring arrangements adjacent to the A433.
- 2.13 The following sections respond to the remaining matters raised by both Highway Authorities and provide the further operational clarification supplied by the applicant.

3 Operational Clarifications

Spa Operation

- 3.1 The submitted Transport Statement assessed the proposed spa on the basis of a maximum occupancy of 12 guests at any one time. The proposals have subsequently been reduced to a maximum capacity of eight guests.
- 3.2 Notwithstanding this reduction, for robustness, the transport assessment continues to consider a maximum spa occupancy of 12 guests. The spa would operate using two-hour booking slots commencing at 10:00, with the final session commencing at 18:00. This equates to a maximum of five sessions per day and, on the robust 12-person assessment basis, a maximum of 60 spa visits per day. The now proposed eight-person capacity would equate to a maximum of 40 spa visits per day.
- 3.3 The spa is intended principally for guests already staying at The Holford Arms. A substantial proportion of spa users would therefore already be present on site and would not generate an additional journey to or from the site specifically to use the spa.
- 3.4 No spa treatments are proposed. The spa would require one additional staff member in a reception role. Cleaning and housekeeping would be undertaken by the existing pub/hotel cleaning staff already working on site. Accordingly, the proposed spa would result in only one additional employee, as previously assessed within the TS.
- 3.5 The applicant has also confirmed that the spa would not operate concurrently with large-scale weddings or functions. This operational restriction could, if considered necessary by the Local Planning Authority, be secured through an appropriately worded planning condition.

Function Events

- 3.6 No increase in the existing function capacity of up to 160 guests is proposed. This represents an established component of the site's operation and was recognised as such within the submitted TS.
- 3.7 The applicant has confirmed that the proposed spa would not operate concurrently with large-scale weddings or functions.

Pub and Restaurant Occupancy

- 3.8 WC has queried the reference within the TS to a maximum non-function occupancy of 84 persons.
- 3.9 For clarity, the figure of 84 persons was derived from the proposed maximum occupancy of the pub and external hospitality areas, together with the maximum number of staff expected to be present on site, as follows:
- 30 internal pub/restaurant covers;
 - 46 external hospitality covers; and
 - 8 members of staff,
- 3.10 This gives a total theoretical occupancy of 84 persons.
- 3.11 For comparison, the equivalent figure for the existing operation is 87 persons, comprising 30 internal pub/restaurant covers, 50 external hospitality covers and a maximum of seven members of staff. The proposed development would therefore not increase the theoretical occupancy associated with the pub and external hospitality areas. These existing and proposed capacities are identified within Table 5.1 of the submitted TS.
- 3.12 The applicant has subsequently clarified that, notwithstanding the number of seats physically available, the kitchen is capable of serving approximately 30 dining covers at any one time.
- 3.13 It is also important to recognise that the individual elements of The Holford Arms do not necessarily represent separate populations. Guests staying in the rooms, chalets, bell tents, and camping accommodation may also use the pub and restaurant facilities and attend weddings or functions held at the site. Adding the theoretical capacity of each individual use would therefore result in some guests being counted more than once.
- 3.14 Accordingly, the figure of 84 persons should not be interpreted as being additional to the occupancy of the accommodation, camping or other hospitality uses. Similarly, simply adding the theoretical maximum capacity of each component of the established operation would not provide a realistic representation of either concurrent site occupancy or associated vehicle and parking demand.

Camping Parking

- 3.15 WC has also requested clarification regarding parking associated with the camping operation.
- 3.16 The applicant has confirmed that touring caravans are accommodated on their respective pitches and that a proportion of camping guests similarly park their vehicles alongside their pitches.
- 3.17 Parking associated with the camping operation is therefore not wholly dependent upon the parking capacity available within the front and rear car parks, with a proportion of camping-related vehicles accommodated within the camping area itself

4 Transport and Parking Impact

Existing and Proposed Operation

- 4.1 Both Highway Authorities recognise that The Holford Arms already accommodates a substantial mixed hospitality and tourism operation. WC specifically notes that the existing parking provision currently serves the public house, guest accommodation and functions/events, and that these uses have historically operated without identified overspill parking issues.
- 4.2 Similarly, GCC accepts the comparative assessment approach adopted within the TS and acknowledges that the existing guest accommodation, camping facilities, bell tents and pub capacity are unchanged, while the function barn already accommodates events of up to 160 guests.
- 4.3 It is important in this context to distinguish between the site's established operation and the additional transport effects arising from the proposed development. The application does not increase the number of guest rooms, chalets, camping pitches or bell tents, nor does it increase the established maximum function capacity. These elements of the site already operate and would continue to do so irrespective of the current proposals.
- 4.4 The principal additional traffic-generating element of the application is therefore the proposed spa, together with one additional member of staff. As set out in Section 3, although the proposed spa capacity has been reduced to eight guests, the transport assessment continues to consider a maximum occupancy of 12 guests for robustness.

- 4.5 The applicant anticipates that the majority of spa users would comprise guests already staying at The Holford Arms. For assessment purposes, however, it has been conservatively assumed that only 50% of spa users would already be on site, with the remaining 50% travelling specifically to use the spa.
- 4.6 On this basis, a 12-person spa session would generate six external spa users. An assumed average vehicle occupancy of 1.5 persons per vehicle results in approximately 4 visiting vehicles per session.
- 4.7 Across five daily sessions, this would equate to approximately 20 visiting vehicles, or 40 two-way vehicle movements over the course of the day. Allowing additionally for the arrival and departure of one additional member of staff, the assessed incremental traffic generation would therefore be approximately 42 two-way vehicle movements per day.
- 4.8 The same assumptions indicate an additional visitor parking demand of approximately four vehicles during each spa session. Including the one additional member of staff, the incremental parking demand associated with the proposed development would therefore be approximately five vehicles at any one time.
- 4.9 This is considered a robust yet realistic assessment. It retains the original 12-person spa occupancy assumption, despite the proposed capacity being reduced to 8 guests, and assumes that only half of spa users are already on site.

Parking Accumulation

- 4.10 GCC has requested a parking accumulation assessment based upon the spa, restaurant, camping pitches, guest accommodation, chalets and function room all operating concurrently at maximum occupancy.
- 4.11 It is not considered that such an exercise would provide a proportionate or representative assessment of the transport implications of the current planning application. The principal additional parking demand arising from the development has already been quantified above and is assessed as approximately five vehicles at any one time.
- 4.12 With the exception of the proposed spa and one additional member of staff, the uses identified within GCC's requested accumulation assessment are existing and established. The application does not seek to increase the number of guest rooms, chalets, camping pitches or bell tents, nor does it increase the established maximum function capacity.

- 4.13 A whole-site maximum accumulation assessment would therefore principally amount to a reassessment of existing uses which are not being intensified by the current application, rather than an assessment of the additional parking effects arising from the development now proposed.
- 4.14 Such an exercise would also risk materially overstating parking demand because the individual components of the site do not operate as independent populations. Guests staying in the rooms, chalets, bell tents, and camping accommodation may also use the pub and restaurant and attend weddings or functions. Simply adding the theoretical maximum occupancy for each use would therefore result in some guests and their associated parking demand being counted more than once.
- 4.15 Importantly, the applicant has confirmed that the proposed spa would not operate concurrently with large-scale weddings or functions. The existing function use, which can accommodate up to 160 guests, would be expected to represent one of the periods of highest parking demand at the site. The additional parking demand associated with the spa would therefore not coincide with this peak function-related demand. A parking accumulation scenario that assumes simultaneous maximum occupancy of the 160-person function facility and maximum operation of the spa would not represent a realistic future operational scenario.
- 4.16 The relevant consideration is therefore whether the additional parking demand generated by the proposed development can be accommodated within the established site during periods when the spa would operate. As set out above, the assessed incremental demand is approximately five vehicles at any one time, comprising four visitor vehicles and one additional staff vehicle.
- 4.17 This represents a modest increase in parking demand when considered in the context of the established hospitality, accommodation, camping and function uses already operating from the site.
- 4.18 WC, in considering the same application and submitted TS, has similarly focused upon the additional effects of the proposed spa and the limited operational clarification necessary to understand those effects. WC has not requested a retrospective maximum accumulation assessment of the wider established operation.
- 4.19 On this basis, a theoretical whole-site parking accumulation exercise is not considered necessary to demonstrate the parking implications of the current proposal.

- 4.20 This approach is also consistent with Policy TR6 of the NPPF, which requires the scope of a Transport Statement or Transport Assessment to be proportionate to the nature and scale of the development and requires reasonable future scenarios to be considered when assessing movement patterns and potential transport impacts. The NPPF defines reasonable future scenarios as a range of realistic transport scenarios. A scenario based on the simultaneous theoretical maximum occupancy of a series of overlapping established uses, including an operational combination that the applicant has confirmed would not occur, would not represent a realistic future scenario and would therefore not provide an appropriate basis for assessing the transport and parking effects of the current proposal.

5 Parking Provision and Vehicle Manoeuvring

Parking Provision

- 5.1 GCC has requested clarification of the overall parking provision at the site, noting that the submitted information variously refers to approximately 55 and 60 parking spaces.
- 5.2 The approved rear car park and chalet parking areas provide a total of 44 defined parking spaces, comprising 36 visitor spaces, three staff spaces and five spaces associated with the chalets.
- 5.3 In addition to these defined spaces, the existing front forecourt provides established informal parking capacity. Based upon the extent of the forecourt and the arrangement previously illustrated within the submitted plans, approximately 16 vehicles can be accommodated within this area.
- 5.4 As explained in Section 2, the proposed front porch has subsequently been omitted from the application and the associated alterations to the front forecourt are consequently no longer required. The existing forecourt and its established parking arrangements will therefore remain unchanged.
- 5.5 It is therefore appropriate to regard the site as providing 44 defined spaces within the rear car park and chalet areas, together with approximately 16 additional informal parking spaces within the existing front forecourt. This equates to an overall parking capacity of approximately 60 vehicles before taking into account parking available within the camping area.
- 5.6 Furthermore, as clarified in Section 3, parking associated with the camping operation is not wholly dependent upon the front and rear parking areas. Touring caravans are accommodated

on their respective pitches, and a proportion of camping guests similarly park alongside their pitches. The site therefore benefits from approximately 60 spaces across the principal parking areas, together with additional on-pitch parking within the camping area. Against this provision, Section 4 has assessed the incremental parking demand arising from the proposed development as approximately five vehicles at any one time.

Front Forecourt Parking

- 5.7 GCC's consultation response raises a number of detailed concerns regarding the geometry and operation of the front forecourt layout shown within the submitted application, including parking aisle dimensions, vehicle manoeuvring and the potential for vehicles to reverse towards the A433.
- 5.8 These comments relate to alterations which were associated with the previously proposed front porch. As the porch has now been omitted from the application, the associated alterations to the forecourt are no longer required and will similarly be omitted.
- 5.9 The existing forecourt will therefore remain in its current form, with no alteration proposed to its established parking, access or manoeuvring arrangements. Accordingly, the detailed geometry and swept-path considerations raised by GCC regarding the previously proposed layout no longer apply to the development now proposed.
- 5.10 It is also relevant that the review of Personal Injury Collision records undertaken as part of the submitted TS identified no recorded collisions associated with the site access onto the A433 during the most recent five-year period. The available collision record therefore provides no evidence of an existing pattern of highway safety incidents associated with the operation of the front forecourt or its access.

Rear Car Park

- 5.11 GCC has also requested a detailed scaled layout and swept-path analysis for the rear car park.
- 5.12 The rear car park is an existing and previously approved element of the site. The approved parking layout associated with planning permission 18/01877/FUL was reproduced within the submitted TS and identifies the arrangement of the rear parking area and the defined parking spaces serving the site. No alterations to this layout or its means of access are proposed as part of the current application.

- 5.13 It is also relevant that the rear car park is accessed from the unnamed side road rather than directly from the A433. This access lies within the Wiltshire Council highway authority area. WC has considered the same application, submitted TS, and has not raised any concerns regarding the geometry or operation of the rear car park or requested a swept-path analysis.
- 5.14 In these circumstances, the request for a further detailed layout and swept-path assessment would principally amount to a retrospective assessment of an existing parking arrangement previously approved under planning permission 18/01877/FUL and which is not proposed to change as part of the current application. Having regard also to the modest incremental parking demand identified in Section 4, such an assessment is not considered proportionate or necessary to determine the transport implications of the current application.

6 Servicing, Refuse and Emergency Access

- 6.1 GCC has requested further information regarding servicing, refuse collection and emergency vehicle access, including swept-path analysis for the relevant design vehicles.
- 6.2 The current application does not alter either of the existing vehicular accesses serving The Holford Arms and does not materially change the established servicing or refuse collection arrangements for the site. The existing public house, guest accommodation, camping and function uses would continue to be serviced in the same manner as at present.
- 6.3 The applicant has confirmed that cleaning and housekeeping associated with the proposed spa would be undertaken as part of the wider hotel housekeeping operation, using the existing staff and servicing arrangements. No separate spa treatment facilities are proposed, and the spa would therefore not introduce a materially different servicing requirement from that already associated with the established hospitality use.
- 6.4 In this context, undertaking swept-path analysis of servicing and refuse vehicles throughout the existing site would principally amount to a retrospective assessment of arrangements serving the established uses, rather than an assessment of a material transport effect arising from the development now proposed.
- 6.5 Similarly, the application does not alter the existing means of vehicular access to the site. There is no transport-related change arising from the application which would necessitate a wider swept-path assessment of emergency vehicle movements across the established site.

- 6.6 Accordingly, additional swept-path analysis for servicing, refuse and emergency vehicles is not considered proportionate or necessary to assess the highway implications of the current application.

7 Pedestrian Accessibility

- 7.1 GCC has requested further consideration of pedestrian accessibility and public transport provision, noting the rural location of The Holford Arms and the absence of continuous footway and street lighting infrastructure along the A433.
- 7.2 The existing accessibility characteristics of the site were described within the submitted TS. The Holford Arms is an established rural hospitality, accommodation, camping, and function venue, and the current application does not alter its location, existing highway connections, or the pedestrian and public transport infrastructure serving the site.
- 7.3 The relevant consideration is therefore the extent to which the development now proposed would materially alter travel demand to and from the site, rather than whether the established site would satisfy the accessibility expectations that might reasonably be applied to a new development in a different location.
- 7.4 As set out within Section 4, the proposed spa would principally serve guests already staying at The Holford Arms. Even adopting the robust assessment assumption that only 50% of spa users would already be present on site, the development is assessed to generate approximately 42 additional two-way vehicle movements over the course of the day, together with one additional member of staff.
- 7.5 Importantly, guests already staying within the hotel, chalets, bell tents or camping accommodation would be able to access the spa internally within the site and would not generate additional pedestrian movements along the A433 or additional demand for public transport specifically as a consequence of using the spa.
- 7.6 The number of additional off-site visitors associated with the spa would in any event be modest. Consequently, the proposal would not result in a material increase in pedestrian movements along the A433 or materially alter demand for the existing public transport services.
- 7.7 In these circumstances, a more extensive reassessment of the pedestrian and public transport accessibility of the established Holford Arms operation would not be proportionate to the nature and scale of the development now proposed. The application does not materially alter

the accessibility characteristics of the site or give rise to a material new demand for pedestrian or public transport that would require additional off-site infrastructure.

8 Summary and Conclusions

Summary

8.1 Based on the analysis and discussions within this Technical Note, the following summary is presented:

- Both WC and GCC accept the principle of assessing the transport implications of the proposal by comparison with the established operation of The Holford Arms.
- The application does not increase the existing guest accommodation, camping facilities or established function capacity of up to 160 guests. The principal additional traffic-generating element is therefore the proposed spa, together with one additional staff member.
- Although the proposed spa capacity has been reduced to eight guests, the transport assessment continues to consider an occupancy of 12 guests for robustness.
- The spa is intended principally for guests already staying at The Holford Arms. Nevertheless, the assessment conservatively assumes that only 50% of spa users would already be present on site, with external visitors assessed using an average vehicle occupancy of 1.5 persons per vehicle.
- On this basis, the proposed development is assessed to generate approximately 42 additional two-way vehicle movements per day, with an incremental parking demand of approximately five vehicles at any one time.
- The spa would not operate concurrently with large-scale weddings or functions. The additional parking demand associated with the spa would therefore not coincide with periods when the established 160-person function use would be expected to generate some of the highest parking demand at the site.
- The site provides 44 defined parking spaces within the approved rear car park and chalet areas, together with capacity for approximately 16 vehicles within the existing front

forecourt. Additional parking associated with the camping operation is available on individual pitches.

- The previously proposed front porch and associated alterations to the front forecourt have been omitted from the application. The existing forecourt, access and parking arrangements will therefore remain unchanged. The five-year Personal Injury Collision review contained within the submitted TS identified no recorded collisions associated with the site access to/from the A433.
- The rear car park is an existing arrangement previously approved under planning permission 18/01877/FUL, with the approved layout reproduced within the submitted TS. No alterations to the rear car park or its means of access are proposed.
- Cleaning and housekeeping associated with the spa would be integrated into the existing hotel operation, and the proposal would not materially alter the established servicing or refuse requirements of the site.
- The proposal would similarly not materially alter the accessibility characteristics of The Holford Arms or result in a material increase in pedestrian or public transport demand.
- Whilst GCC accepts the comparative assessment approach, a significant proportion of the further information requested relates to existing and established elements of The Holford Arms which are not proposed to change as part of the current application.

Conclusions

- 8.2 The additional transport effects arising from the proposed development have been identified and quantified. The assessment demonstrates a modest incremental impact of approximately 42 additional two-way vehicle movements per day and approximately five additional parked vehicles at any one time.
- 8.3 A theoretical whole-site assessment based upon every component of the established operation operating independently and simultaneously at maximum capacity would not represent a realistic future scenario, particularly given the overlap between the individual uses and the confirmed operational separation between the spa and large-scale functions. The proportionate assessment undertaken within the TS and this Technical Note is therefore considered consistent with Policies TR6 and DM3 of the NPPF.

- 8.4 It is therefore concluded that the proposed development can be accommodated within the established operation of The Holford Arms without resulting in an unacceptable impact upon highway safety or a severe residual cumulative impact upon the highway network. There are consequently no transport or highway grounds which should prevent planning permission being granted.



1 September 2026