DERBYSHIRE County Council

Response provided under the delegated authority of the Executive Director for Place

Planning Manager
Amber Valley Borough Council
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RIPLEY
Derbyshire
DE5 3XE

Highway Officer: Robert Smith
Our ref: AVBC/2025/013674/R3
Your ref: AVA/2025/0558
Date: 23 January 2026

Dear Rebecca Godson,

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

PROPOSAL: Removal of existing residential cabin and caravans, and replacement with self-build residential cabin. Creation of a vehicular access

LOCATION: The Croft Wirksworth Road Whatstandwell Matlock Derbyshire DE4 5HS

Derbyshire 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 the application is deferred pending additional information.

Background

Further to the highway authority's most recent comments on this application, dated 23rd December 2025, please find additional comments below following receipt of further information provided by the applicant's agent, in the form of an email dated 5th of January 2026.

The email provides copies of the traffic survey data obtained by the applicant. It refers to an email submitted by the applicant's highway consultant, in which the following points are raised:

1. The traffic survey data shows a heavy goods vehicle (HGV) proportion of less than 5%, justifying the use of a deceleration rate higher than that recommended by the highway authority (i.e. 0.375g).

2. Visibility splays should be projected to an offset 1m into the carriageway from the nearside carriageway edge on Wirksworth Road. A precedent for such an approach (application reference AVA/2025/0516) is cited.

HGV Proportions

The traffic survey records vehicle categories by class, with 13 classes of vehicle recorded, as shown on the automatic traffic count (ATC) classification sheet copied below:

Road Data Services Ltd

Class No	Vehicle Description	Class No	Vehicle Description
1	Car, Light Van, Taxi	5	Rigid 2 Axle HGV + 2 Axle (Close coupled) Trailer
1	Light Goods Vehicle	6	Rigid 3 Axle HGV + 2 Axle Drawbar Trailer
1	Car or Light Goods Vehicle + 1 Axle Caravan or Trailer	6	Rigid 3 Axle HGV + 3 Axle Drawbar Trailer
1	Car or Light Goods Vehicle + 2 Axle Caravan or Trailer	7	Artic, 2 Axle Tractor + 1 Axle Semi-Trailer
2	Medium / Large Goods Vehicle	8	Artic, 2 Axle Tractor + 2 Axle Semi-Trailer
3	Rigid 3 Axle Heavy Goods Vehicle	9	Artic, 2 Axle Tractor + 3 Axle Semi-Trailer
3	Rigid 3 Axle Heavy Goods Vehicle	10	Artic, 3 Axle Tractor + 1 Axle Semi-Trailer
4	Rigid 4 Axle Heavy Goods Vehicle	10	Artic, 3 Axle Tractor + 2 Axle Semi-Trailer
4	Rigid 4 Axle Heavy Goods Vehicle	11	Artic, 3 Axle Tractor + 3 Axle Semi-Trailer
5	Rigid 2 Axle HGV + 2 Axle Drawbar Trailer	12	Bus or Coach, 2 Axle
5	Rigid 2 Axle HGV + 3 Axle Drawbar Trailer	12	Bus or cCoach, 3 Axle
5	Rigid 2 Axle HGV + 1 Axle Caravan or Trailer	13	Vehicle with 7 or more Axles

Classification Classes: Car/Van: 1 OGV1/Bus: 2,3,5,6,7,12 OGV2: 4,8,9,10,11,13

The percentage of HGVs depends on the class numbers that are considered to fall into the relevant category. The vehicle description sheet indicates that all vehicle types, other than class number 1 (car/van), fall within an Other Goods Vehicle (OGV)/Bus or OGV2 classification.

Medium Goods Vehicles (MGV)/Class 2 can include twin-axled HGVs of up to 18 tonnes gross weight. This class should therefore, in the absence of any other information, be included in the calculation of the HGV percentage.

Treating vehicle class 2 as HGVs results in the percentage of HGVs being substantially higher than 5%, at circa 14% and 16% for eastbound and westbound traffic flows on Wirksworth Road, respectively.

For the HGV proportions to fall below 5%, the numbers of light vehicles in the MGV/Class 2 would have to be above 53 (64% of Class 2) and 73 (69% of Class 2) vehicles in the eastbound and westbound directions, respectively. The highway authority considers it unlikely that the numbers of light vehicles in this category would reach such levels and that the proportions of HGVs are likely to exceed 5% in both directions on Wirksworth Road.

The highway authority does not therefore accept that HGV percentages are well below 5% of the total flows (less than 1%), as noted in the additional information.

The highway authority therefore maintains that a deceleration rate of 0.375g should be used in the visibility splay calculations, in accordance with paragraph 10.1.9 of Manual for Streets 2 (MfS2).

Visibility Splay Geometry

The highway authority's observations on application AVA/2025/0516, cited by the applicant's agent, stated that the visibility splays should be measured "at a point **no greater than** 1m into the carriageway". The highway authority had not, as stated in the submitted email, "requested visibility 1m into the carriageway". Application AVA/2025/0516 does not therefore provide a precedent. In any event, each application should be assessed on its merits.

Indeed, the submitted email states that "There is always some engineering judgement needed" and notes that the nearside vehicle track would sit within a range of distances from the carriageway edge.

The applicant has provided no technical justification for choosing a 1m offset in this instance.

Wirksworth Road is a classified road (B5035), of a higher category than residential streets to which Manual for Streets (MfS) is mostly applied. Wirksworth Road is rural

in nature and has signs of verge damage and edge repair in the vicinity of the site. This is likely due to the limited width and centreline markings which position the nearside vehicle track close to the carriageway edge.

The highway authority's approach accords with the advice given in MfS paragraph 10.5.3 which states that "a more accurate assessment of visibility splay is made by measuring to the nearside edge of the vehicle track".

Having regard to the above, it is therefore appropriate to project the site access major road visibility splays to the nearside vehicle track and not to an arbitrary point 1m into the carriageway.

The applicant should submit a revised plan clearly demonstrating increased major road visibility splay lengths projected to the nearside vehicle track, along with evidence to confirm the location of the nearside vehicle track relative to the carriageway edge. This may require alteration of the site access location to ensure that visibility to the west of the site access falls within controlled land.

Conclusion

In view of the above, the highway authority's 23rd December 2025 observations remain appropriate.

Accordingly, the highway authority recommends that this application should not be determined until the applicant has submitted revised details which satisfactorily address the issues raised above and in the 23rd December 2025 observations. The highway authority will comment again following receipt of further information.

Yours sincerely,

Robert Smith
Transport Development Management

Date Received	Case Officer	Reviewer	Date Issued
13 January 2026	**Robert Smith**	**SD**	**23 January 2026**