DERBYSHIRE County Council

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

Planning Manager
Amber Valley Borough Council
PO Box 15, Town Hall, Market Place
RIPLEY
Derbyshire
DE5 3XE

Highway Officer: Steve Dudhill
Our ref: AVBC/2025/013643/R1/R2
Your ref: AVA/2025/0587
Date: 27 February 2026

Dear Ms Cox,

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

PROPOSAL: Outline application for residential development of up to 200 dwellings including affordable housing, infrastructure, public open space, local equipped area for play, biodiversity enhancement, habitat creation and public right of way improvements (Departure from Local Development Plan as the site within the Green Belt, would affect Rights Of Way and may affect setting of the Conservation Area)

LOCATION: Land East Of Horsley Road/South of Woodhouse Road Horsley Road Kilburn Belper Derbyshire

---

Derbyshire County Council, the Highway Authority acting in its role as Statutory Consultee, has undertaken a further 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 determination of this planning application should be deferred pending submission of additional information.

Background

The highway authority's initial observations on this planning application were issued on 9/9/25. The applicant has submitted a revised Transport Assessment (TA) which seeks to address the highway authority's 9/9/25 observations.

The highway authority has considered the revised TA and has identified issues which affect the TA study area.

As submitted, the TA does not provide a full assessment of the highway network over which development traffic flows exceed the threshold at which detailed traffic impact assessments are required. This is compounded by concerns that the TA does not accurately estimate development trip distributions.

These issues fundamentally affect the subsequent traffic impact assessments undertaken in the TA. The highway authority has not therefore considered the whole of the revised TA in detail at this stage as such work would be premature before the study area and trip distribution issues are satisfactorily resolved.

These observations explain the highway authority's initial findings and are issued on an interim basis without prejudice to the highway authority's consideration of the whole TA. These observations do not convey approval to any parts of the revised TA that are not referred to below.

TA Study Area

Paragraph 2.2.6 of the highway authority's Planning, Streets, and Places (PSP) guidance sets out thresholds for transport assessment. Detailed assessments should be undertaken where a development gives rise to an increase in traffic flows of more than 30 vehicles per hour (vph; two-way). This threshold is consistent with that stated in paragraph 2.11 of the Department for Transport's (DfT's) Guidance on Transport Assessment (GTA). It is also acknowledged in paragraphs 5.7 and 6.2 of the revised TA as being material to the definition of the TA study area.

Notwithstanding concerns in relation to the trip distribution estimates presented in the revised TA (see later), TA Figure 5.2 shows development traffic flows along Tants Meadow, to the south of the site, of more than the 30vph threshold.

This finding alone demonstrates that the TA study area should be extended and that the TA should include detailed assessments of development traffic impacts on Tants Meadow and at the B6179 Derby Road/Tants Meadow junction.

Development Trip Distributions

The revised TA presents estimated development trip distributions at the site access based on the use of 2011 National census data (see TA paragraphs 5.9 and 5.10 and TA Appendix H).

Beyond the site access, development traffic is distributed at junctions within the TA study area using surveyed turning proportions at those junctions.

The highway authority's 9/9/26 observations addressed the latter issue, stating that "use of existing turning movements at the junctions within the TA study area to determine development trip distributions at those junctions is not appropriate since the turning movements include a range of trips with origins/destinations over a wide area and may not represent the likely peak hour trip distributions associated solely with the proposed development." The revised TA does not adopt the appropriate methodology. Development trip distributions at junctions within the appropriate TA study area should be determined with reference to, and be consistent with, the census data.

The revised TA estimates development trip distributions from the census data in the following way:

1. For travel to work trips with destinations within Amber Valley, the TA estimates a 72%/28% north/south split at the site access onto Horsley Road.

2. For travel to work trips with destinations outside Amber Valley, the TA estimates a 23%/77% north/south split at the site access onto Horsley Road.

3. The TA then assumes that the combination of the above trip distributions would result in a 50%/50% north/south split in development traffic flows onto Horsley Road at the site access.

However, the approach in point 3 above is not appropriate as it does not properly allow for the routes taken by the relative numbers of trips with destinations within and outside Amber Valley.

The numbers of trips with destinations within and outside Amber Valley, from the data in TA Appendix H, are 338 and 446, respectively. If the estimated north/south splits specified in points 1 and 2 above are correct, this indicates that the total numbers of trips with destinations to the north and south of the site should be 346 and 438, respectively. This indicates that the appropriate north/south splits in development traffic at the site access should be 44%/56%, not 50%/50%.

The above finding will increase development traffic flows to the south of the site access, relative to those shown in the revised TA. This will give rise to greater levels of development traffic impact on Tants Meadow and at the B6179 Derby Road/Tants Meadow junction.

Such impacts should be subject to detailed traffic impact assessment in a revised TA which properly estimates development trip distributions using the National census data.

Impact on Primary Route Network

Most of the development traffic on Tants Meadow would be likely to use the B6179 Derby Road and the A38(T), to the south of Tants Meadow.

The A38(T) is part of the primary route network, for which National Highways (NH) is the highway authority.

The Local Planning Authority should therefore draw the TA and the above issues to the attention of NH to determine their requirements, if any, for detailed assessment of development traffic impacts on the primary route network.

Conclusion

Having regard to the above, the highway authority continues to recommend that this planning application should not be determined until the applicant has submitted further details which satisfactorily address the above issues.

The highway authority will comment again following receipt of further information.

SD; DCC TDM; 27/2/26.