Turners Farm

Transport Technical Note

Response to DCC Highways Comments

Hexa ref: 601212-HEX-XX-TP-RP-X-0002-V01
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Revision: V01



Engineering opportunity.

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Author	Signature	Date
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Checker	Signature	Date
Will Morgan Principal Transport Planner		30/07/26

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1.0 Introduction

Hexa Consulting have been appointed by Valley CIDS to produce a report to review the transport related criteria and information in relation to the proposed development of a purpose-built education facility.

The proposed site location is at Turners Farm and is currently occupied by a number of buildings that accommodate Valley CiDS. Valley CiDS is an independent Christian charity based throughout Derbyshire and Nottinghamshire and at the Tuners Farm site they provide practical learning pathways to young people who are referred from over 30+ secondary schools throughout Derbyshire and Nottinghamshire. The site functions as a vocational learning site for young people on alternative education programmes. The site also accommodates the Swanick Men's Shed.

The site comprises a cottage, farmhouse and a number of outbuildings together with 48 acres of agricultural land. The site is accessed from Cray's Hill (B6016) via a private drive.

This technical note provides a response to consultee comments provided by Derbyshire County Council (DCC) Highway Officers and seeks to address each point in turn. The DCC consultee response is provided within **Appendix A** for reference.

DCC have recommended refusal of the proposals on highways grounds. The reason for the requested refusal is outlined below;

"The proposed development would intensify the use of the existing substandard access from Turners Lane onto the classified B6016 Clay's Hill, where the levels of emerging visibility are significantly below required standards. The material intensification of use of Turners Lane arising from the proposed development would therefore result in an unacceptable impact on highway safety, causing danger and inconvenience to other road users and adversely affecting the safe and efficient operation of the classified road. The proposed development therefore fails to provide safe and suitable access for all users, contrary to National Planning Policy Framework paragraph 115 b)."

It is understood that the concerns of DCC highways are related to that of the limited visibility of the access junction and that an increase in vehicle movements at this junction could pose a further safety risk. This note seeks to provide additional information to demonstrate that the increase in vehicle movements will not be a material change and discusses the issue of restricted visibility. This note also discusses the other comments raised by DCC in the consultee response.

Trip Generation

The proposed development would increase the number of pupils currently at the site from 10 to 20 with staff members increasing from 3 to 6. A total increase of up to 13 pupils and staff compared to how the site currently operates. DCC raised concerns within their consultee

response that the proposals would result in a material increase in vehicle movements at the Turners Lane and Cray's Hill junction.

DCC assert that the potential doubling of trips (assuming all new pupils and staff arrive in separate vehicles) is a significant increase and not a non-material change as summarised within the supporting Transport Technical Note (TTN).

DCC highlight that the TTN presents vehicle turning count movements at the Tuners Lane/ Cray's Hill junction for the period of 8-9am. DCC state that this underestimates the traffic impact of the development as it does not consider vehicle movements outside of this peak hour. DCC then presents traffic turning count movements for the entire surveyed period and presents the figures when doubled.

This is considered to be an overly simplistic way of determining the development impact and conversely overestimates the potential number of vehicle movements to be generated by the development. Whilst the development proposes to double the number of pupils and staff served by the site, this will not have an impact on the number of servicing vehicles, visitors and other vehicle movements related to the site. In addition, the PM survey period is likely to have captured vehicle movements associated with the Swanick Men's Shed, which is located on the site. This operates between 3:30pm and 6pm on a Wednesday, a time period covered by the PM survey.

Considering a first principles approach, assuming that all pupils and staff arrived and departed by car within the same hour a total increase of 13 arrivals and 10 departures in the AM peak could be expected and a total of 10 arrivals and 13 departures could be expected within the PM peak. A total of 23 two-way movements in each peak hour (a maximum of circa 1 new trip every 2.5 minutes on average across the hour). As DCC have noted, it is clear that some of these movements are likely to occur outside of the peak hours of 8-9am and 3:15-4:15pm. This presents a robust worst-case scenario in that all staff and pupils arrive and depart individually via car and that no car sharing or trips via sustainable transport are made.

As noted within the application, the site operates Monday to Friday between the hours of 8.30am - 4.30pm, which includes staff setup and prep time. For most students, their day runs from 9.30am - 2.30pm. In light of this, the staff and pupil trips are likely to be dispersed across the survey period as highlighted by DCC. This would therefore suggest that the 23 two-way trips in the AM and PM period will be dispersed and not concentrated into a single peak period. The larger amount of potential vehicle movements will be associated with pupil use arrivals expected for a 09:30am start of day and 2:30pm end of day.

To summarise, the development could result in a worst-case scenario trip generation of up to 23 two-way peak hour movements. Typically, 30 two-way peak hour vehicle movements are used as a threshold to trigger further assessment of development impacts as identified within the DfT

Guidance on Transport Assessment (2007). In a worst-case scenario, the proposed development would not reach this indicative threshold.

In addition to the above, the DCC School Transport Team also provide travel services to students needing to attend the site. This will likely reduce the number of vehicles and with greater pupil numbers the potential for shared journeys increases.

Taking the above additional information into account, the potential trip generation of the development is considered to be a non-material change in vehicle movements associated with the site.

Highway Safety

To assess if the proposed development will contribute to a worsening of local highway safety concerns, an analysis of the local highway safety and reported incidents has been undertaken. To provide a robust assessment, Personal Injury Accident (PIA) data for the highway network adjacent to the site has been obtained from CrashMap for the most recent five years, the period being 2019 to 2023. This detail was provided within the submitted TTN supporting the submission. DCC note that the utilisation of crashmap data is out of date and spans periods during covid lockdowns and is therefore unreliable.

Further Incident Data has been obtained from Derbyshire Police and is presented below in **Figure 1-1**. This data is presented for the dates 01/05/2021 to 30/04/2026.

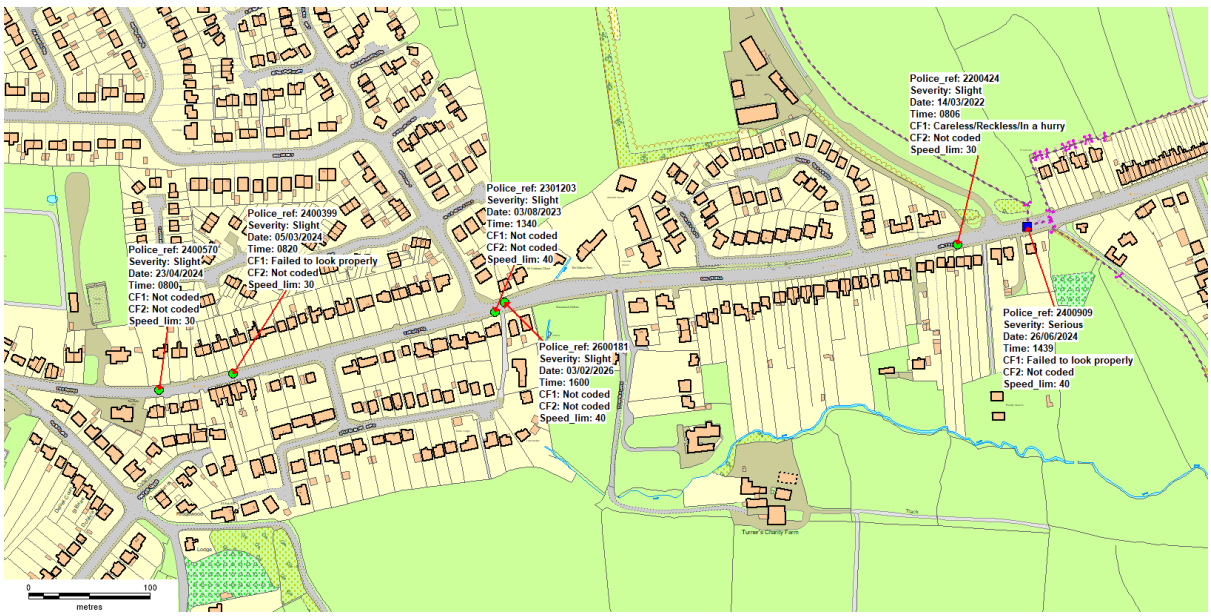


Figure 1-1 - Derbyshire Police Collision Report map - 2021 – 2026

Incident reference	Date & Time	Location	Severity	Causation
2200424	14/03/2022	SWANWICK - CRAY'S HILL J/W UNNAMED RD-O/S NO.13 (17706)	Slight	PED. RAN ACROSS THE C/WAY AND FAILED TO NOTICE V1 (P/CYCLE); PED. COLLIDED WITH V1 CAUSING RIDER TO FALL OFF V1 SUSTAINED INJURIES AND PED. TO HAVE INJURIES (17706)
2301203	03/08/2023	SWANWICK-B6016 CRAY'S HILL, DELVES J/W BROADWAY O/S NO.79 (18144)	Slight	PED STEPS OFF THE PAVEMENT INTO THE PATH OF V1, WHICH CLIPS THE PED'S ELBOW CAUSING SLIGHT INJURY (18144).
2400399	05/03/2024	SWANWICK - B6019 THE DELVES - O/S NO 49 (5869)	Slight	C1 - FACING AWAY FROM FLOW OF TRAFFIC, STEPS INTO RD AND INTO PATH OF V1. CAUSES DAMAGE TO V1 AND MINOR INJURY TO C1. (5869).
2400570	23/04/2024	SWANWICK- THE DELVED O/S NO.37 (18144)	Slight	PED WALKED INTO THE C/WAY INTO THE PATH OF V1, COLLIDING AND SUSTAINING SLIGHT INJURIES (18144).
2400909	26/06/2024	LEABROOKS - B6016 SWANWICK RD -	Serious	IP (CHILD) CROSSING RD ON SCOOTER WITHOUT LOOKING IS HIT BY V1 SERIOUS INJ TO IP - 5869
2600181	03/02/2026	SWANWICK - THE DELVES J/W CRAYS HILL - O/S N0 91 - 5869	Slight	V1 PARKED WITH DOOR OPEN - GETTING CHILDREN OUT OF CAR - BUS PASSES TOO CLOSE, CATCHES DOOR AND KNOCKS CHILD BACK INTO CAR CAUSING INJURY - 5869

Table 1-1 - Derbyshire Police Collision Report

The collision data report obtained from Derbyshire Police shown above in **Figure 1-1** and **Table 1-1** reports a low number of incidents in the locality of the site. There is no history of any recorded incident at the site access. The causation of the incident noted above is largely dominated by pedestrian incidents with most attributed to pedestrian behaviour. None of these incidents is

related to visibility of motor vehicle users. The collision report covers the section of Cray's Hill that is subject to a 40mph speed limit. Along this section of road, many junctions and access points do not meet the current visibility splay criteria as set out by DMRB and as discussed in the section below.

Visibility

DCC note and highlight the shortfall in achievable visibility splays at the access junction of Turners Lane and Cray's Hill. DCC outline within their comments that DMRB standards should be applied in this context and that prior to dry weather adjustments the DMRB visibility requirement is 120m in both directions.

It is acknowledged that the achievable visibility splays as per the standards as set us in DMRB are not fully achievable at this access point. An initial assessment has been undertaken to review if moving this access point to the west provides any benefit to the visibility splays provided. Unfortunately, the achievable visibility splays remain similar to those achieved at the existing access.

It must be noted that the existing access currently operates with this shortfall in visibility. The review of the Derbyshire Constabulary Personal Injury Accidents above demonstrates that there is no existing safety concern at the access or along the 40mph section of Cray's Hill that is subject to 40mph speed limits but has a number of access points and junctions that are subject to restricted visibility.

Numerous driveways and access points along Cray's Hill that is subject to the 40mph speed limit are likely to fall short of the required visibility splays. For example, Cherry Tree Avenue to the east of the site that serves circa 43 dwellings has particularly limited visibility to the west from the junction. Similar restrictions in achieving these visibility are also noted at the Junctions of Broadway and Delves Bank Road to the west of the site access. The collision report discussed above notes that there are no accidents related to visibility at the site access or within the immediate area.

If a 2m X distance/ set back is utilised, then visibility splays to the east of 70m and to the west of 80m are achievable. It is likely that relying on this visibility would result in the front of some vehicles protruding slightly into the carriageway. However, in this circumstance, the ability of drivers and cyclists to see this overhang from a reasonable distance is present and the ability to manoeuvre around the vehicle without undue difficulty is also possible. These revised visibility splays are provided in **Appendix B**.

When considering the anticipated minor uplift in vehicle movements associated with the proposed development, the lack of recorded safety incidents at the site access and the

proposed improvements to the site access which would reduce potential vehicle conflicts at the site access it is considered that the access will continue to operate safely.

The proposed improvements to the access will remove potential conflicts between vehicles entering and exiting the site with the passing space on Turners Lane further removing potential for vehicle conflict.

Refuse and servicing

The proposed servicing would be in line with existing servicing and access requirements. DCC however have requested details on how service and refuse access will be gained to the new building.

Valley CiDS have confirmed that the site is currently serviced by the Amber Valley Borough council's Waste Collection Team and has been for 10 years. The site currently uses a single eurobin for general waste and a 240liter domestic size bin for recycling. General waste is collected weekly with recycling fortnightly. Valley CiDS have confirmed that this will be the continued operation of the site and have highlighted that there have never been any issues with the refuse vehicles safely entering, servicing and exiting the site.

Cycle parking

As noted in the DCC highway officer comments, 'Given the nature of the proposed development, it is considered likely that staff and pupils will rely on private cars or taxis to travel to and from the site.'

The highway officer has noted that no cycle parking arrangement has been shown. DCC cycle parking standards set out that for secondary schools 1 space per 10 staff should be provided as well as 1 space per 5 pupils. The development would therefore require a total provision of 5 cycle parking spaces. These cycle parking spaces are to be provided.

2.0 Conclusion

Hexa Consulting have been appointed by Valley CIDS to produce a report to review the transport related criteria and information in relation to the proposed purpose-built education facility providing essential education opportunities for the poor and disadvantaged children in the locality.

The site currently accommodates the Valley CIDS. Valley CIDS are a Christian charity based throughout Derbyshire and Nottinghamshire and at the Tuners Farm site they provide practical learning pathways to young people who are referred from over 30+ secondary schools throughout Derbyshire and Nottinghamshire.

This report provides information relating to the surrounding highway and the application details. The report has considered to site location and local context. The report has also provided a review of the national and local planning policy and guidance relating to highways planning considerations.

DCC Highway officers have raised an objections against the proposals citing traffic generation and visibility. This report has provided additional information in relation to highway safety and revised visibility splays demonstrating that improved visibility splays can be achieved.

A review of the locally recorded accident data has been undertaken and has concluded that there is no existing accident issue that could be exacerbated by the proposals and that there has never been a recorded accident at the site access.

An improved access is proposed which removes any potential conflict between vehicles entering and exiting the site in addition to providing pedestrian priority along Cray's Hill. The access proposals also include a formal passing place, to the south of the cottage, to accompany the two existing informal passing spaces. The proposals therefore represent a betterment to the existing access provision.

The proposals would result in a non-material increase in vehicle movements. As such, it is expected that the improved junction would operate in a safe manner, as the existing access does so already.

As such, it is considered that the proposals should be acceptable to Derbyshire County Council (DCC).

Appendices

Appendix A – DCC Consultee Comments

Appendix B – Visibility Splays

Appendix A - DCC Consultee Comments

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: Robert Smith
Our ref: AVBC/2026/017305
Your ref: AVA/2026/0292
Date: 23 June 2026

Dear Laura Anthony,

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

PROPOSAL: Erection of an educational building and associated works (may affect the setting of a listed building)

LOCATION: Valley CIDS Charity Farm Turners Lane Swanwick Alfreton Derbyshire DE55 1AS

Derbyshire County Council, the Local Highway Authority (LHA) 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 planning permission should be refused.

Background

This planning application seeks permission for the erection of an educational building and associated works, to provide an increase in teaching capacity at the existing Turners Farm site, at Turners Lane, Swanwick. Turners Lane takes access onto the classified B6016 Cray's Hill.

Turners Farm currently functions as a vocational learning centre for young people on alternative education programmes. The Design and Access Statement (DAS) indicates that the site accommodates a cottage, farmhouse, and outbuildings, together with circa 48 acres of agricultural land. The main body of the site is illustrated on Scheme Design Site Plan (Ref: PA-25-009-SK-81-04-C), with the full extent of the land within the applicant's ownership illustrated on Site Location Plan (Ref: PA-25-009-EX-81-01-A).

This planning application seeks permission for a purpose-built educational facility that would include a staff office/kitchen area, 2 teaching rooms, and several specific function rooms, such as a sensory room and music/art room. The additional facility would enable the site to increase teaching capacity. The site currently accommodates up to 10 pupils, and this would increase to 20. Staff numbers would increase from 3 to 6. The net change would therefore be an increase of up to 10 pupils and 3 staff members. The site would continue to operate Monday to Friday between the hours of 8.30am and 4.30pm. Most students attend between 9.30am and 2.30pm.

Site Access Existing

Turners Lane meets Cray's Hill by means of an informal access arrangement. The main body of the site is at the south-eastern end of Turners Lane, some 280m from Cray's Hill. The section of Turners Lane which runs north-south between Cray's Hill and the point where the Lane turns eastwards towards Turners Farm carries a public footpath (No. 2 in the Parish of Swanwick).

Turners Lane is substantially a single lane track, having a width of circa 2.6m. Passing opportunities along Turners Lane are limited. In particular, the section of Turners Lane immediately to the south of Cray's Hill has no formal passing places. Two-way traffic conflicts could give rise to overlong reversing movements on the Lane which would be detrimental to pedestrian safety on the public footpath, or to reversing movements onto the classified Cray's Hill where visibility is limited, and traffic speeds are relatively high given the horizontal and vertical alignments of Cray's Hill.

Surface conditions along Turners Lane are poor, particularly where it meets Cray's Hill, where the Lane sits immediately adjacent to a driveway access serving several dwellings.

The B6016 Cray's Hill is a single carriageway road subject to a 40mph speed limit, with central hatched markings which provide a short, informal 'slot' facility for vehicles turning right from Cray's Hill into Turners Lane.

Visibility along Cray's Hill from Turners Lane is limited by the narrow footway width and adjacent boundary features on the southern side of Cray's Hill, with a telegraph pole at the back of footway immediately to the east of the access further restricting visibility. Cray's Hill is bound by a hedgerow to the west of Turners Lane, which is controlled by the applicant, as indicated on the Location Plan, the field to the west of Turners Lane and south of Cray's Hill being within the applicant's 'blue line' boundary.

Bus stops are located on Cray's Hill circa 50m to the west of Turners Lane.

Trip Generation

The applicant has submitted a Transport Technical Note (TTN) in support of this planning application.

The proposed development is likely to double the number of pupils and staff with a net increase of 10 pupils and 3 staff. The TTN states that the proposed development is therefore likely to result in a doubling of traffic flows to and from the site. A doubling of trips is a significant increase, not a “non-material change” as asserted in the TTN.

The TTN presents traffic survey data at the Cray’s Hill/Turners Lane junction. The TTN states that 8 arrivals were recorded, with no departure movements, in the AM peak hour. 7 arrivals and 4 departures were recorded in the PM peak hour.

However, the TTN summarises traffic flow data only for the periods 8am to 9am and 3.15pm to 4.15pm. It does not summarise data for the whole of the surveyed periods i.e. 7.30am to 10.30am and 2pm to 5pm. The TTN therefore understates the levels of traffic flow along Turners Lane.

Traffic flows to and from Turners Lane over such periods are as follows: 7.30am to 10.30am – 18 arrivals and 13 departures; 2pm to 5pm – 15 arrivals and 12 departures.

A doubling of the above flows would give rise to the following total traffic flows: 7.30am to 10.30am – 36 arrivals and 26 departures; 2pm to 5pm – 30 arrivals and 24 departures.

The above traffic flows cover a total period of only 6 hours and do not therefore represent the total daily traffic flows along Turners Lane associated with the existing site and the proposed development, which would be higher still.

The applicant’s traffic surveys confirm that Cray’s Hill carries over 8000 vehicles per day on an average weekday. The scope for conflict between traffic using the substandard site access and traffic on Cray’s Hill is therefore significant.

The increases in traffic flow give rise to concerns over intensified use of the site access where visibility along Cray’s Hill is limited. It also gives rise to concern over the increase in two-way traffic conflicts along Turners Lane given the limited opportunities for vehicles to pass along Turners Lane, particularly in the immediate vicinity of Cray’s Hill. Having regard to these issues, and those expressed earlier, the highway authority is concerned at the potentially adverse highway and pedestrian safety implications of the proposed development on Turners Lane and at its access onto the classified Cray’s Hill.

Visibility at the Cray’s Hill/Turners Lane Junction

The proposed development would increase teaching capacity and enable more students to attend the site, doubling staffing numbers from 3 to 6 and pupil numbers from 10 to 20. This gives rise to concerns over intensified use of the site access where visibility along Cray’s Hill is limited.

Reference is made in TTN paragraph 2.2 to past accident records. However, that provides no reliable guide to the future safe use of the site access onto Cray’s Hill under increased traffic loading. The highway authority also notes that the accident data presented in the TTN was obtained from the “Crashmap” database for the

period 2019 to 2023. Such data is out of date, spans periods of Covid19 lockdown, and is therefore unreliable.

A traffic speed survey has been undertaken on Cray's Hill which showed 85th percentile approach traffic speeds of 39.5mph (63.6kph) westbound and 40.5mph (65.2kph) eastbound.

TTN Appendix G suggests visibility splay requirements along Cray's Hill of 2.4m x 101m to the east, due to the gradient of Cray's Hill, and 2.4m x 83m to the west.

The above is based on a reaction time of 2s, a deceleration rate of 0.375g and a gradient of -12.30% being applied in the easterly direction.

However, for speeds of more than 60kph, Table 10.1 of MfS2 requires a reaction time of 2s and a deceleration rate of 0.25g to be applied. The gradient of -12.3% on Cray's Hill to the east of Turners Lane equates to circa 1 in 8.1, which appeared too steep. The LHA considers that a gradient of circa -5.8% is more appropriate from a desk top study.

Applying the above inputs and using the visibility splay calculation methodology as adopted in the TTN, results in visibility splay requirements along Cray's Hill of 2.4m x 121m to the east, and 2.4m x 105m to the west.

TTN Appendix F purports to show that achievable splays of 2.4m x 33m and 2.4m x 35m are achievable to the east and west, respectively. However, the plan in TTN Appendix F shows that the 2.4m x 33m visibility splay to the east of Turners Lane has been projected over the adjacent third-party driveway access, which is not within the control of the applicant. The visibility splay to the east of Turners Lane, when projected over the applicant-controlled land and highway land, would be circa 2.4m x 25m.

It is not clear from the submitted details whether the visibility splay to the east of Turners Lane would be further reduced by the telegraph pole at the back of footway to the east of Turners Lane. However, the splay to the east of Turners Lane could be obstructed by vehicles waiting to turn out of the driveway immediately to the east of Turners Lane so that a much-reduced splay, below 25m, would occasionally be available.

Notwithstanding the above issues, a major road visibility splay distance of only 25m along Cray's Hill to the east of Turners Lane, the critical direction, falls well below the calculated 121m requirement.

The visibility splay along Cray's Hill to the west of Turners Lane has been projected to the southern edge of the central hatching at the splay extremity. It is considered unlikely that a vehicle travelling eastbound would be located close to the southern carriageway edge, given the central hatched markings. However, the southern edge of the hatching is not where most vehicles approaching from the west along Cray's Hill would be seen from Turners Lane. Projecting the splay to that point underestimates the actual level of visibility available from Turners Lane towards eastbound vehicles on Cray's Hill. Projecting the splay to the northern side of the hatching would provide a more appropriate measurement of visibility to the west of Turners Lane. That would give an available major road visibility splay distance of

circa 51m to the west of Turners Lane. However, that would still fall far short of the calculated 105m requirement.

It is not clear from the submitted information whether the applicant's speed surveys were undertaken in dry weather conditions. Design Manual for Roads and Bridges (DMRB) Advice Note CA185, updated in 2020, requires speed measurements to be undertaken in dry weather. For robustness, in accordance with paragraph 3.1.1 of CA185, a correction of +4kph should be added to the applicant's surveyed speeds. Such a correction has not been applied in the LHA's calculations but, if it were necessary, the calculated major road visibility splay requirements set out above would be lower than required.

Notwithstanding the analyses presented in the TTN, and the above assessments, the LHA considers that the Design Manual for Roads and Bridges (DMRB) should be the starting point for determining major road visibility splay distances on classified roads and on roads where speeds are higher than 40mph. The LHA notes that paragraph 10.1.3 of Manual for Streets 2 (MfS2) states that MfS2 provides guidance on stopping sight distances for streets where 85th percentile speeds are up to 60kph (i.e. 37mph). This supports the LHA's stance that the visibility splay calculation method set out in MfS2 is inappropriate for the assessment of the Cray's Hill/Turner's Lane junction and that the DMRB methodology should be used.

Based on DMRB methodology, and without correcting the surveyed 85th percentile speeds to dry weather speeds, the desirable minimum major road visibility splay requirements are 120m in both directions from the site access along Cray's Hill, taken to the nearside carriageway edge, in line with DMRB Design Standards CD109 and CD123.

The achievable major road visibility splay distances fall significantly below the DMRB requirements.

Whilst the applicant could improve the level of visibility along Cray's Hill to the west of Turners Lane, by projecting the visibility splay over land which the planning application "blue line" boundary indicates to be within the applicant's control, and by relocating the hedgerow to respect the resulting visibility splay envelope, such an improvement would not address the significant shortfall in visibility in the critical direction along Cray's Hill to the east of Turners Lane which is confirmed by both the MfS- and DMRB-based assessments.

The highway authority therefore considers that the proposed development would not satisfy the requirement of National Planning Policy Framework (NPPF) paragraph 115 b) i.e. it would not provide a safe and suitable access for all users. The proposed development would therefore be likely to give rise to an unacceptable impact on highway safety and, in accordance with NPPF paragraph 116, planning permission should therefore be refused on highway grounds.

Site Access Improvements

The applicant has submitted an improved access arrangement (Appendix D of the Transport Technical Note (TTN)) and swept path analysis (Appendix E of the TTN). The improvement scheme proposes widening of the existing access to provide a minimum carriageway width of 5.5m for the first 10m from the nearside carriageway

edge, together with a short section of 2m wide footway along the western side of Turners Lane.

An additional passing place is proposed on the southern section of Turners Lane, measuring 5.5m wide by 5.5m long, in addition to the two existing informal passing places on Turners Lane.

No changes are proposed to the hatched area along Cray's Hill to better accommodate vehicles turning right into Turners Lane from Cray's Hill.

Whilst the improvements to the Cray's Hill/Turners Lane junction, and the provision of an additional passing place on Turners Lane might mitigate the increase in two-way traffic conflicts along Turners Lane, the improvement scheme does not address the significant shortfalls in visibility at the Cray's Hill/Turners Lane junction.

Internal Layout

The proposed site plan (ref: PA/25-009-SK-81-04-C) illustrates provision of 10 parking spaces, together with two drop-off spaces, compared with the existing site plan (ref: PA/25-009-EX-81-02-B) which illustrates 4 parking spaces.

The LHA considers the proposed level of parking provision to be sufficient.

No details have been provided to show how service/refuse access would be achieved to the proposed new building. Details are required.

No cycle parking arrangements have been shown.

Sustainable Travel

Given the nature of the proposed development, it is considered likely that staff and pupils will rely on private cars or taxis to travel to and from the site. This is supported by the applicant's traffic surveys, the results of which are summarised earlier in these observations.

Whilst the nearest bus stops are located approximately 420m from the site centre, opportunities to access the site by sustainable modes would be restricted and a high level of reliance on private car travel is likely.

Public Right of Way (PRoW)

The definitive route of Swanwick Footpath 2 runs along Turners Lane and will be affected by the proposals. Consideration should be given to the safety of the public using the path. Private rights must not derogate the rights of the public to use the path.

The following general guidance is also advised:

- The footpath must remain open, unobstructed and on its legal alignment.

- There should be no disturbance to the path surface without prior authorisation from the County Council's PRoW team.

- Any changes to the path surfaces would need to be agreed by the County Council's PRoW team.

- Any access considered would be required to not obstruct the PRoWs and not open onto the paths.

- Consideration should be given to the safety of members of the public using the path during and after the works. A temporary closure of paths may be permitted on application to DCC where the path remains unaffected on completion of the development.

- There should be no encroachment of the paths, and no fencing should be installed without consulting the County Council's PRoW team.

Conclusion

Based on the above assessments, the LHA recommends that planning permission should, in accordance with NPPF paragraph 116, be refused on highway grounds for the following reason:

> The proposed development would intensify the use of the existing substandard access from Turners Lane onto the classified B6016 Clay's Hill, where the levels of emerging visibility are significantly below required standards. The material intensification of use of Turners Lane arising from the proposed development would therefore result in an unacceptable impact on highway safety, causing danger and inconvenience to other road users and adversely affecting the safe and efficient operation of the classified road. The proposed development therefore fails to provide safe and suitable access for all users, contrary to National Planning Policy Framework paragraph 115 b).

Yours sincerely,

Robert Smith
Transport Development Management

Date Received	Case Officer	Reviewer	Date Issued
12 May 2026	**Robert Smith**	**AN**	**23 June 2026**

Appendix B – Visibility Splays



Notes

1. Do not scale this drawing. All dimensions must be checked/ verified on site. If in doubt ask.
2. This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.
3. All dimensions in meters unless noted otherwise. All levels in metres unless noted otherwise.
4. Any discrepancies noted on site are to be reported to the engineer immediately.
5. This drawing should be printed and read in colour.

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Design Notes

1. .....

Legend

Issues & Revisions

Rev	Date	Details of Issue	Drawn	R'wd
P01	30.07.26	First issue for review and comment.	IA	WM

Consultant

HEXA

Client

Valley CiDS

Project Title

Turners Farm

Drawing Title

Visibility Splay

Drawn By	IA	**Reviewed By**	WM
Hexa Ref	601212	**Scale at A1**	1:200

Purpose of Issue

For Information

Status

S3

Project - Originator - Zone - Level - Type - Role - Number

6001212-HEX-XX-XX-TP-DR-0400

Revision

P01