DERBYSHIRE County Council

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

Planning Manager
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Highway Officer: Robert Smith
Our ref: AVBC/2026/018243
Your ref: AVA/2026/0406
Date: 14 August 2026

Dear Laura Anthony,

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

PROPOSAL: Self-Storage site accommodating up to 64 storage containers (may affect the setting of a listed building)

LOCATION: Land Off Bullbridge Hill, Bullbridge Hill, Ambergate, Belper Derbyshire

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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 determination of this planning application should be deferred pending the submission of additional information.

Background

This planning application seeks permission for the change of use of a former car park, to create a self-storage site accommodating up to 64 storage containers.

The site is currently vacant. However, it is noted in the Design and Access Statement (DAS) that the site has an established industrial and commercial setting. It is not clear precisely what extant use the site has. Clarification from the Local Planning Authority (LPA) is required.

Site Access

Access to the site is proposed via an existing access located on Bullbridge Hill, close to the signalised A610 Ripley Road/Bullbridge Hill junction.

Emerging site access visibility, taken from a setback distance of 2.4m measured along the centreline of the access from the nearside edge of the carriageway, is constrained by the existing palisade fencing to the site frontage.

Where a new or improved access emerges onto a footway, 2m x 2m pedestrian visibility splays shall be provided on both sides of the access at the back of the footway, in accordance with paragraph 4.8.1 of the Local Highway Authority's (LHA) guidance document Planning Streets and Places (PSP). Such splays shall be maintained clear of any object greater than 0.6m in height relative to adjacent footway level.

In view of the above, the existing/proposed 1.8m high palisade fence detail should be amended accordingly to maximise visibility on both sides of the site access and to incorporate the necessary pedestrian visibility splays. Details of available site access visibility splays should be provided.

Given the proximity of the site to the A610/Bullbridge Hill traffic signals, waiting vehicles on Bullbridge Hill have the potential to restrict access/egress to/from the site. Vehicles waiting to turn right into the site could obstruct through movements on Bullbridge Hill resulting in queues on Bullbridge Hill which could obstruct the A610/Bullbridge Hill junction. The LHA is therefore concerned that the proposed development may lead to vehicles queuing back to and through the signals, resulting in obstruction of, and conflicts with, traffic flows on the classified A610.

The applicant should therefore provide additional information/details as follows.

- Analysis of the interaction of site access traffic with queues on the Bullbridge Hill approach to the A610/Bullbridge Hill junction. This will require reference to the signal staging at the A610/Bullbridge Hill junction.

- Queue length surveys on the Bullbridge Hill approach to the A610/Bullbridge Hill junction.

- A waiting area to provide off-carriageway stacking space in front of the gates to the site.

- Proposals for 'Keep Clear' road markings and relocation of signal detector loops on Bullbridge Hill.

- Evidence to show that drivers leaving the site can see the signal aspects when waiting to leave or whether such drivers could leave under the wrong signal, in conflict with northbound traffic on Bullbridge Hill.

- Evidence of the available level of visibility to the south of the access along Bullbridge Hill for vehicles turning right out of the site when queues are present on Bullbridge Hill.

- A Stage 1 Road Safety Audit, following provision of an acceptable preliminary site access arrangement scheme design.

The above list is not exhaustive. Further information may be required following assessment of the above information.

Swept path analysis is required at the site access and within the site.

Containers 59 to 63 appear to restrict access into the site. The applicant should consider reducing the scale of development accordingly.

The proposed sliding gate scales at 5m from the highway boundary. Any gates should be set back a sufficient distance from the highway boundary to enable the largest vehicles expected to visit the site to pull completely off the highway prior whilst waiting at the gates.

The access should be surfaced in a bound material for a minimum length of 5m within the site measured from the highway boundary, to reduce the possibility of deleterious material being deposited in the highway.

Provision is required to prevent the unregulated discharge of surface water to the public highway.

The access is located close to an existing bus stop. Observations have been requested from EMCCA on public transport issues and will be provided when available.

The above issues should be addressed by submission of a highway technical note and additional/revised plans.

Internal Site Layout

Due to the nature of the proposed development, parking associated with the storage containers will occur outside the storage units whilst loading and unloading takes place, minimising the requirement for separate car parking provision for those units.

The applicant should provide a minimum level of parking provision to serve the proposed use which will avoid the risk of on-street parking which could adversely impact highway and pedestrian safety. The applicant should provide evidence to demonstrate the appropriateness of the provision. Trip rates and parking accumulation estimates should either be derived from first principles or from existing data, for example: using the TRICS Database or by comparison with land uses of similar size and geographic circumstance.

In line with paragraph 4.7.1 of the LHA’s Parking Guidance for New Developments (PGND), sheltered, secure and accessible cycle parking should be provided at or near the front door of the building. The quantum of spaces must reflect the requirements set out in Local Transport Note 1/20.

Trip Generation

It is not clear, from the limited information submitted, whether the proposed development will result in a change in traffic movements to and from the site. The applicant should provide analyses which compare the trip generation of the established use with that proposed.

Self-storage facilities typically generate short-duration customer trips, primarily by private car and light van. The DAS notes that the containers are intended for domestic and light commercial self-storage purposes. Subject to this being suitably conditioned, to ensure that the site could not be operated under the general B8 use class, for which on-site activities could change to those associated with standard warehousing storage/distribution uses, it is not expected that the site would attract heavy goods vehicle (HGV) movements beyond the initial delivery and installation of containers.

It is necessary to assess trip generation, vehicle activity, and internal circulation demand arising from the proposed development and whether it can be safely and sustainably accommodated. This includes consideration of the adequacy of the existing access arrangements, the suitability of the surrounding highway network, and the ability of the site layout to safely accommodate vehicle manoeuvring, loading, and parking without conflict.

To undertake an appropriate assessment of the proposed development, the following information is required:

- A transport statement assessing the extant and proposed uses on the site.
- Traffic movements associated with the extant and proposed uses at the site accesses and to and from the wider highway network.
- Comparison of the above and an assessment of how any change in traffic flows could, if necessary, be adequately mitigated.
- Demonstration of how the site will operate in practice. i.e. parked removal van adjacent to containers and other vehicles manoeuvring within the site.
- A site layout and logistics plan showing access, circulation, parking, loading, and turning arrangements.
- Swept path analyses to demonstrate safe and unobstructed vehicle movements for cars and large delivery vehicles.

The above issues should be addressed by submission of a highway technical note.

Sustainable Travel

Due to the nature of the proposed development, it is considered likely that most trips associated with the site will be undertaken by private vehicles.

Conclusion

The LHA does not consider that the application as submitted fully assesses the highway impact of the proposed development. Further information is required as set out in these observations.

The LHA therefore recommends that this application should not be determined until the applicant has submitted further information which satisfactorily addresses the above issues.

The LHA will comment again following receipt of further information.

Yours sincerely,

Robert Smith
Transport Development Management

Date Received	Case Officer	Reviewer	Date Issued
21 July 2026	**Robert Smith**	**SD**	**14 August 2026**