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

Planning Manager
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Highway Officer: Steve Dudhill
Our ref: AVBC/2026/018650
Your ref: AVA/2026/0415
Date: 7 September 2026

Dear Mrs Godson,

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

PROPOSAL: Use of land for containerised self-storage and associated external works

LOCATION: Langley Mill Miners Welfare 112 Station Road Langley Mill Derbyshire NG16 4BP

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 further information.

Background

This planning application seeks permission for the use of the former Langley Mill Miners Welfare social club site, at 112 Station Road, Langley Mill, for a containerised self-storage facility.

Access to the site would be taken from an existing shared vehicular access onto the classified A608 Station Road, which is subject to a 30mph speed limit in the vicinity of the site. The site access is logged on the highway authority's records as a restricted local access road, over a length of circa 29m south of the A608, and also carries Aldercar and Langley Mill public footpath 11.

The scheme comprises 161 steel storage containers, internal circulation routes, customer parking, cycle parking, access improvements, landscaping, replacement boundary treatments, security infrastructure, and ancillary engineering works.

The applicant proposes improvements to the A608 access which include a “ghost island build-out”, resurfacing works, and widening of the access road. A 1.2m wide advisory pedestrian route is proposed along the western side of the access.

The application is supported by various documents including, of particular interest to the highway authority, the site layout details shown on the soft landscape drawing number MR26-058/101 Rev Draft A and the Transport Statement (TS; dated June 2026).

Transport Statement (TS)

The highway authority has the following observations on the TS, using the chapter/section/paragraph numbers in that document for reference.

Chapter 2 – the policy analysis presented in the TS has been rendered out of date by the publication of the updated National Planning Policy Framework (NPPF) in August 2026.

Section 3.4 – accident data from the Crashmap database is routinely out of date and covers periods of Covid19 lockdown. Given that, and the closure of the social club and cessation of use of the site, the existing accident record is unlikely to be representative of conditions that would apply if the site access were more extensively used. Notwithstanding that, the TS reports a single accident which appears to have occurred at, or close to, the site access. No assessment of that accident has been provided. The conclusion at TS para 3.4.3 is not therefore accepted. Updated accident data should be obtained and analysed. Details should be obtained from DataQualityRRD@Derbyshire.Police.UK.

Chapter 4 – by its nature, and given limited attendance of the site by staff (see TS paras 5.1.1 and 6.1.1), the proposed development is likely to be almost exclusively used by private vehicles and is unlikely to attract any material volumes of trips on foot, by cycle, or by public transport. The analyses in TS chapter 4 are therefore largely redundant.

Section 5.2 – the proposed site access improvements are considered in detail later in these observations.

Section 5.3 – the highway authority assumes that most users would wish to park adjacent to their container to load and unload their vehicles and that formal, separate car parking provision can therefore be limited (but see comments on the site layout later in these observations).

Para 6.1.3 and Table 4 – the data presented in TS Table 4 shows the average weekday daily trip rate associated with 7 container storage sites operated by the applicant. An average daily trip rate of 0.191 trips per container unit is cited.

Para 6.1.4 – the proposed development traffic generation is stated to be 31 daily two-way trips, based on applying the 0.191 trips per unit to the 161 units proposed

by the applicant on the current site. TS Appendix C presents the raw survey data for the sites operated by the applicant and appears to show that the data in TS Table 4 is based on customer visits. The customer visits cited in TS Appendix C appear to be one-way trips. The average daily trip rate of 0.191 trips per unit shown in TS Table 4 is therefore a one-way trip rate. The total two-way average daily trip rate should therefore be twice the cited value i.e. 0.382 two-way trips per day. Applying that to the 161 units proposed by the applicant gives an average two-way traffic flow at the site access of 62 vehicles per day.

Para 6.1.5 – having regard to the above, the average hourly traffic flow of 3 trips/hour cited in TS para 6.1.5 is a one-way flow. The two-way traffic flow should be 6 vehicles per hour. TS paragraph 6.1.5 concludes that the typical weekday hourly traffic generation of the proposed development is likely to be lower than that associated with the former use of the site on the basis that the former use would have hosted social events and bowling matches. However, the conclusion is not supported by any quantitative evidence of traffic flows associated with the former social club use. It relates only to the average weekday hourly one-way development traffic flow, rather than considering the impact of the proposed development in relation to daily average flows over the whole year. The TS does not recognise the potential infrequent use of the social club facility due to its restricted opening hours, low levels of traffic generation during the day, particularly on weekdays, potential low levels of car mode share given the nature and catchment of the former use, and the potential for linked trips between the welfare and bowling green uses, the latter of which would have been seasonal.

TS paragraph 6.1.8 – notwithstanding the above, the highway authority considers that the proposed development would be unlikely to give rise to a material change in traffic flows on the highway network beyond the site access. The highway authority considers that the proposed development is likely to increase traffic flows at the site access and is concerned to ensure that the site access will safely accommodate the traffic likely to be generated by the proposed development.

The TS should be amended having regard to the above issues.

Site Access

The site access takes access onto the A608 by means of a dropped kerb footway crossing. Visibility from the existing access is severely restricted to the east due to the existing boundary wall to the adjacent dwelling.

The access varies in width; the first 25m to the south of the A608 is between 3.7m and 4.4m wide. The access road widens beyond this point to widths which vary between circa 8m and 13m wide close to the entrance to the main body of the site and to the rear of St Andrews Church.

The access is hard paved over most of its width, save for a narrow grass verge and embankment adjacent to the boundary with St Andrew’s Church on the western side of the access. Telegraph poles restrict the width of the site access, as does a single pole with light.

Site Access Improvements

The applicant proposes to improve the site access as shown on drawing numbers 2602901 P01 and 2602902 P01, presented in TS Appendix B.

The improvements include alterations to the existing road markings on Station Road to provide a ghost island build out 0.7m to the north of the existing southern kerb line to improve visibility. TS para 5.2.6 states that the proposed site access improvement would provide a 2.4m x 43m visibility splay along the A608 to the east of the site access.

The access will also be widened to seek to better accommodate two-way vehicle movements.

A 1.2m wide advisory pedestrian route is proposed along the western side of the access. This pedestrian route would be demarcated by road markings to seek to establish the pedestrian route without compromising the existing shared surface arrangement. The line of footpath 11 falls along the centre of the site access over its initial length south of the A608. The applicant should note that the advisory pedestrian route cannot alter the definitive line of the footpath.

TS para 5.2.3 states that the proposed access widening would offer a minimum overall access width of 4.2m (3m plus 1.2m advisory pedestrian route) meaning that cars could pass in opposite directions along the access. The TS acknowledges that this would require a vehicle to overrun the advisory pedestrian route over the narrower sections of the access road. If two vehicles are required to pass whilst pedestrians are using the access, the TS argues that there is suitable forward visibility for vehicles to negotiate and give way where appropriate.

The full length of the access between the A608 and the site will be resurfaced.

The following issues arise:

1. The choice of the 43m major road visibility splay distance along the A608 to the east of the access is not supported by traffic speed survey data. The highway authority requires that traffic speed surveys should be carried out to determine whether appropriate visibility splays are achievable from the proposed site access, commensurate with actual 85th percentile traffic speeds on the A608 approaches to the proposed site access.

2. Any improvement in site access visibility should be achieved by physical widening of the footway adjacent to the site access, rather than by road markings as proposed.

3. Widening of the site access to the south of the A608 assumes that the full width between boundary features is available. This ignores the need to allow for retaining works to accommodate the level difference currently accommodated by the embankment and a short section of stone wall between the access and St Andrews Church on the western side of the site access and to avoid undermining the fence along the Church boundary. The proposed 3m to 3.5m wide track plus the 1.2m wide pedestrian route could not be accommodated given the need for such works.

4. Changes to the proposed site access improvements arising from the above issues, may affect the swept path plots presented in TS Appendix B, which should be reviewed accordingly.

5. 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 LHA's Planning, Streets, and Places (PSP) guidance. Such splays should be maintained clear of any object greater than 0.6m in height relative to adjacent footway level. Such pedestrian splays would not be achievable within land under the applicant's control.

6. Driveway accesses should typically have a minimum width of 4.8m for the first 8m measured from the back of footway. 0.5m wide margins should be added if the driveway is physically bound. Such dimensions cannot be achieved.

7. The applicant has provided no swept path plots to confirm that two large cars can pass in the mouth of the site access without mutual obstruction and obstruction of the classified A608.

8. The southern end of the advisory pedestrian route does not link directly to footpath 11, the location of the footpath being incorrectly shown on drawing number 2602902 P01. The footpath is to the west of the location shown on that drawing and the pedestrian route should tie-into that. Correctly positioning the southern end of the pedestrian route could allow a greater width of carriageway to be made available for two vehicles to pass without mutual obstruction, and without obstructing pedestrians, to the north of the proposed site access. Such an opportunity should be considered when amending the site access scheme to show the correct footpath and pedestrian route locations.

The applicant should review the site access improvement scheme to address the above issues.

Site Layout

TS sections 5.3 and 5.4 consider the car parking and servicing requirements of the proposed development. It is noted that the width available between containers in most of the aisles, as shown on drawing number MR26-058/101 Rev Draft A, is circa 4.7m. This is unlikely to be sufficient to accommodate a vehicle passing a parked vehicle whilst allowing access to and from the parked vehicle. The applicant should confirm whether it is anticipated that occupants will load/unload vehicles directly adjacent to their container and, if so, should provide details which confirm that adequate aisle widths would be available.

Public Right of Way

Footpath No. 11 in the Parish of Aldercar and Langley Mill) runs along the initial section of the access off the A608 Station Road.

Consideration must 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 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 Rights of Way Section.

• 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 will be permitted on application to the County Council where the path remains unaffected on completion of the development.

• There should be no encroachment of the path, and no fencing should be installed without consulting the County Council's Rights of Way section.

Signage is required to alert drivers to the footpath and details can be secured by planning condition.

Conclusion

The highway authority recommends 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; 7/9/26.