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
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DE5 3XE

Highway Officer: Graham Foulkes
Our ref: AVBC/2026/017645/R2
Your ref: AVA/2026/0319
Date: 27 October 2026

Dear Ms Anthony,

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

**PROPOSAL: Change of use of land and erection 3no. glamping pods, with decking, footpaths, permeable track, parking and turning area, secure bicycle storage and recycling/refuse storage**

**LOCATION: Land at Meadow Croft Hillcliff Lane Turnditch Belper Derbyshire**

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

## Background

This planning application proposes the change of use of, and erection of 3 no. glamping pods on, land at Meadow Croft, Hillcliff Lane, Turnditch. Hillcliff Lane is a classified road subject to the National speed limit.

The LHA's most recent observations on this planning application were issued on 13/8/26. The applicant has submitted further information comprising a revised Transport Access Note (TAN Rev 1; dated 14/9/26) with various technical appendices, together with an email dated 15/9/26 which summarises the key points of the TAN.

## Site Access Visibility Splay Requirements

TAN paras 4.1 to 4.9 appear to suggest that Design Manual for Roads and Bridges (DMRB) Advice Note CA185 does not stipulate the use of dry weather traffic speeds when determining major road visibility splay requirements. Published in 2019, CA185 supersedes the 2010 Manual for Streets 2 (MfS) and preceding DMRB design standards and advice, although MfS relies on the same equations for determining visibility stopping sight distances that sit behind the DMRB methodology.

The TAN ignores CA185 para 2.5.1 which states that "All speed measurements should be taken in dry weather conditions" but TAN para 4.9 does confirm the requirement, in CA185 para 3.1.1, that traffic speeds obtained in wet or partially wet conditions should be increased (in this case by +4kph) to provide dry weather equivalent traffic speeds.

Consequently, the LHA considers that, in considering this planning application, given that Hillcliff Lane is a classified road subject to the National speed limit and having regard to the recorded traffic speeds presented in the TAN, major road visibility splay distances should be determined using DMRB methodology based on dry weather equivalent traffic speeds.

Weather information has been supplied in TAN para 7.2 from the weather station at Denby Pottery, circa 9 miles east of the application site. The weather data confirms that there were periods during the October 2025 traffic speed survey when there was rain and that, therefore, the road surface along Hillcliff Lane was likely to be wet. In accordance with CA185 paras 2.5.1 and 3.1.1, the LHA therefore considers that the 85$^{th}$ percentile traffic speeds recorded in the October 2025 surveys should be increased by +4kph to provide dry weather equivalent traffic speeds for use in determining the major road visibility splay requirements along Hillcliff Lane.

As explained in the LHA's 13/8/26 observations, the appropriate dry weather 85th percentile approach traffic speed of vehicles approaching the site access from the south (northbound) is 46.9mph and from the north (southbound) is 48.0mph. Such speeds are in the order of 75kph to 77kph which, in accordance with DMRB methodology, confirms a design speed of 85kph. The desirable minimum major road visibility splay requirements in both directions from the site access along Hillcliff Lane, based on the 85kph design speed, are therefore 160m, which the DMRB permits to be projected to the nearside carriageway edge from a minor road visibility setback distance of 2m in this case.

The visibility splay assessment provided in the LHA's 13/8/26 observations therefore remains valid. The 160m major road visibility splay requirement is not achievable in the horizontal plane along Hillcliff Lane, from a 2m minor road visibility setback distance, on either side of the proposed site access.

**Achievable Site Access Visibility Splays – to North of Access**

Drawing number 63943/02, presented in TAN Appendix 5, illustrates visibility splays along Hillcliff Lane from the proposed site access.

To the north of the proposed site access, the submitted drawing shows a 2m x 155m visibility splay constructed in accordance with DMRB methodology. The drawing also confirms that a 160m visibility distance can be achieved between a vehicle waiting to turn right into the site and a southbound vehicle on Hillcliff Lane.

The above visibility splays, formed in the more critical direction to the north of the proposed site access, are acceptable to the LHA.

Implementation of such splays will require the removal of vegetation from within the visibility splay envelope, with new planting to be located no closer than 1m from the splay envelope to allow for future growth. The longitudinal section shown on drawing number 63943/02 also confirms that works are required to the mature tree (T26) to raise the crown clear of the visibility splay in the vertical plane. The Local Planning Authority (LPA) may wish to consider the impacts of providing the above splays on vegetation along the applicant's controlled frontage.

The necessary works would fall within highway land and/or within land under the applicant's control. A revised site location plan should be provided which encloses the above visibility splay envelope and new planting, where within land under the applicant's control and outside the highway, within the planning application "red line" site boundary.

**Achievable Site Access Visibility Splays – to South of Access**

A 160m major road visibility splay cannot be achieved to the south of the site access in the vertical plane due to the constraint imposed by the vertical curve on Hillcliff Road to the south of the site access. The maximum available splay in the vertical plane, between driver eye heights of 1.05m at both splay extents, is 139m. The LHA considers that a similar splay would apply towards a vehicle waiting to turn right into the site access, although the detail has not been shown by the applicant.

The LHA must therefore consider whether to accept the available 139m visibility splay distance as a departure from standard. Factors in favour include: 1. The speed survey was undertaken in the vicinity of the site access where northbound traffic speeds on Hillcliff Lane may be higher than those on the approach to the crest and following the bend to the south of the proposed site access; 2. Visibility to the south of the access is in the less critical direction; 3. Visibility in the critical direction can be achieved in accordance with the required standard, as explained earlier; 4. The bend, crest, and central hazard warning lines on Hillcliff Lane to the south of the site discourage northbound drivers from overtaking; 5. The available splay distance of 139m is circa 87% of the required 160m distance; 6. Traffic flows turning right into the site access would be relatively low; 7. A management plan for the proposed development, to include directions to the site and a requirement for signage to highlight the location of the site access, amongst other matters, could be secured by planning condition.

Having regard to the above, the LHA is prepared to accept the available 139m visibility splay to the south of the proposed site access. As such a splay falls entirely within the highway there would be no requirement for a planning condition to secure that splay.

**Site Access Layout**

The applicant's 15/9/26 email confirms that revised site access layout details have not been provided at this stage, indicating that details could be supplied once visibility splay issues have been resolved.

The LHA's 13/8/26 observations in relation to site access layout therefore remain to be resolved and revised site access layout details remain to be submitted.

The site access scheme, when drawn in accordance with the LHA's requirements, is likely to require the submission of an amended planning application "red line" site location plan.

**Conclusion**

Further information is required as set out in the above observations.

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

The LHA will comment again following receipt of further information.

Yours sincerely,

Graham Foulkes
Transport Development Management

| Date Received | Case Officer | Reviewer | Date Issued |
|---|---|---|---|
| **26 October 2026** | **Graham Foulkes** | **SD** | **27 October 2026** |