

Transport Technical Note

Proposed Holiday Lodges

Whalley Rd, Hurst Green

26044 April 2026



INTRODUCTION

This report appraises the visibility splay provision for a development proposal for 4 holiday lodges in Hurst Green. The planning application for this proposal (ref 3/2025/0758) is currently in its consultation period and the Highway Authority (Lancashire County Council) have formally responded on 3rd December 2025, concluding that the following planning condition should be included in this application:

8. No building use hereby permitted shall be commence until visibility splays 2.4 metres back from the centre line of the access and extending 120m to the west and 110m to the east has been provided at the access, as shown on the approved plans. Nothing shall be erected, retained, planted and / or allowed to grow at or above a height of 0.9 metres above the nearside carriageway level which would obstruct the visibility splay. The visibility splays shall be maintained free of obstruction at all times thereafter for the lifetime of the development.
Reason: To ensure adequate inter-visibility between highway users at the street junction or site access, in the interests of highway safety.

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The visibility splays required to comply with the above condition cannot be achieved therefore the condition is considered to be undeliverable.

Details submitted by the applicant and consultation responses from the Highway Authority suggest that the visibility splays comply with the Design Manual for Roads and Bridges (DMRB). This is disputed for a number of reasons, however the required parameters to comply with DMRB have also been incorrectly applied.

The visibility splays must be provided in full at all times and in perpetuity of the lifetime of the development to ensure highway safety is maintained. There are three reasons why the splays cannot be provided including third party land requirement, the vertical alignment of Whalley Road and continual maintenance of the hedgerow.

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DMRB PARAMETERS

Visibility splays of 2.4m x 120m (to the west of the site access) and 2.4m x 110m (to the east of the site access) are required. These are based on the design speed of Whalley Road and are considered to be appropriate however the 600mm object height does not comply with the standards set out in DMRB.

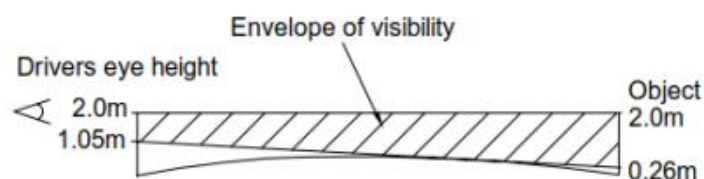
CD109 Highway Link Design which forms part of DMRB sets out the measurement criteria for stopping sight distances (and therefore visibility splay requirements). Figure 3.1 in CD109 (below) shows that the object height should be 0.26m, and not 0.6m as required by the Highway Authority.

Stopping sight distance

- 3.1 Stopping sight distance as identified in Table 2.10 shall be measured between driver's eye heights of 1.05 metres and 2.00 metres to object heights of between 0.26 metres and 2.00 metres measured from the road surface, as shown in Figure 3.1.

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Figure 3.1 Measurement of stopping sight distance



VERTICAL ALIGNMENT OF WHALLEY ROAD

The topography of Whalley Road means visibility is obstructed. Attached is a drawing (26044-SK-01) which shows the visibility splay to the west. This is based on our own topographical survey and therefore some discrepancies may be evident when compared to the applicant's topographical survey.

It is clear from the long section on drawing 26044-SK-01 that to the west of the access, a crest in Whalley Road blocks views towards a dip in the road (located adjacent to the layby). The crest obstructs the visibility to the target object height of 0.26m.

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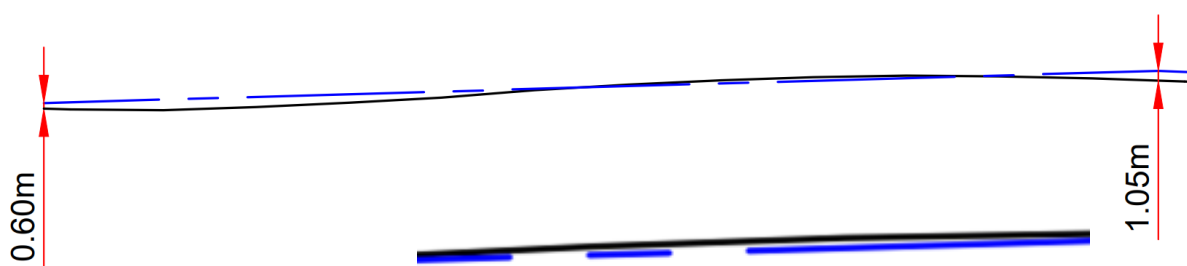


This reduces the visibility splay provision to a length which is not compliant with DMRB despite the Highway Authority suggesting it does. The development proposals will therefore have a significant impact on highway safety and will not be compliant with the NPPF.

Drawing 26044-SK-01 also shows the maximum speed of eastbound traffic for the available stopping site / visibility distance. This is only 25.7 mph, some 18 mph slower than the recorded design speed of Whalley Road (and significantly slower than the speed limit of 60 mph).

The Transport Technical Note (TTN) produced by Mode Transport Planning (Aug 2025) also presents a long section of the visibility splay but this does not prove the splay is available. The obstruction (crest on Whalley Road) is evident on Modes' drawing (J32-8018-PS-001 rev D).

An extract of this drawing is shown below, and clearly shows the crest blocking the visibility splay, and therefore the minimum requirements are not achieved in the applicant's submitted drawings. The blue line represents the visibility splay, which goes below (and is therefore blocked by) the black curve (ie the crest in Whalley Road).



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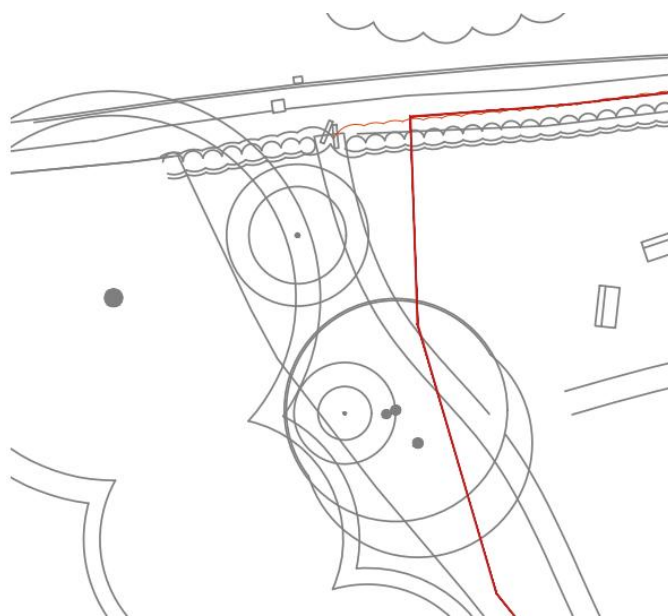


HORIZONTAL ALIGNMENT OF WHALLEY ROAD

We also have concerns regarding the ability to provide unobstructed visibility due to the horizontal alignment of Whalley Road. There is however application drawings showing questionable locations of hedgerows and boundaries in an attempt to justify acceptable visibility provision.

The following should be reviewed and commented upon in detail by the Highway Authority given that the outcome of obstructed visibility splays would lead to undeliverable planning conditions and a significant impact on highway safety.

Some of the hedge running adjacent to Whalley Road will need to be lowered and is located in third party land, however the recently submitted drawings (30th March) are contradictory and confusing as they show different red line boundaries. The western boundary area differs on each drawing, with one drawing showing the red line boundary following the Title boundary (and therefore likely to be the correct boundary). An extract of that drawing (number 06 rev A) is shown below. This would also highlight that improvements to the public right of way would not be possible.



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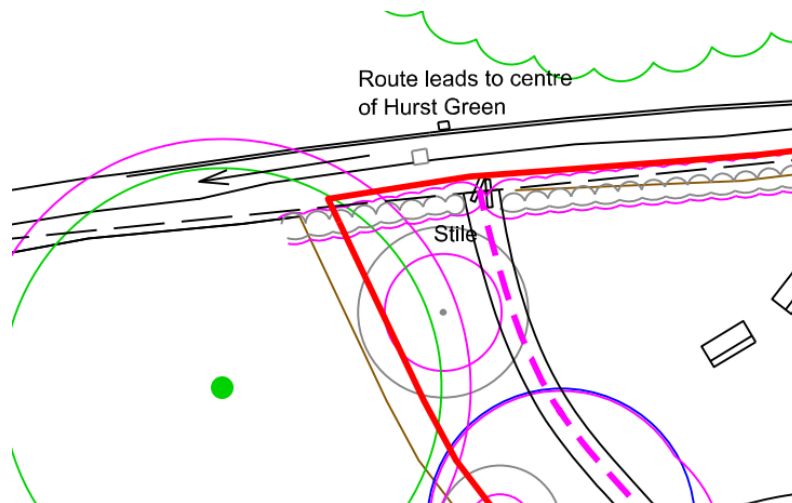
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Furthermore, the hedge is shown behind the visibility splay and therefore indicating a relocated hedge (see extract of the applicant's drawing (number 03 rev C) below, and photograph showing the existing hedge significantly closer to the road edge).



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The Highway Authority have advised that they will enforce the maintenance of the hedgerow to ensure it does not grow higher than 900mm. This hedge height is also not sufficient to facilitate any visibility splay given that the required object height of 260mm (or even 600mm) will not be visible if there is an adjacent obstruction 900mm high.

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Maintaining a very low hedgerow height will be very difficult to enforce along a 250m section and obstructions within the visibility splay will no doubt frequently occur, especially during the spring and summer months.

It is clear that cutting of hedgerows in this area is currently not enforced / carried out which is evidenced by the frequently overgrown hedges along the site side of Whalley Road. This obstructs the footway and should be maintained now, so the hedgerow maintenance and enforcement strategy for Hurst Green is not likely to change just to facilitate visibility splays for four holiday lodges. The photograph below shows the overgrown hedgerow on the site side of the application site, which obstructs the footway and any future visibility splay.



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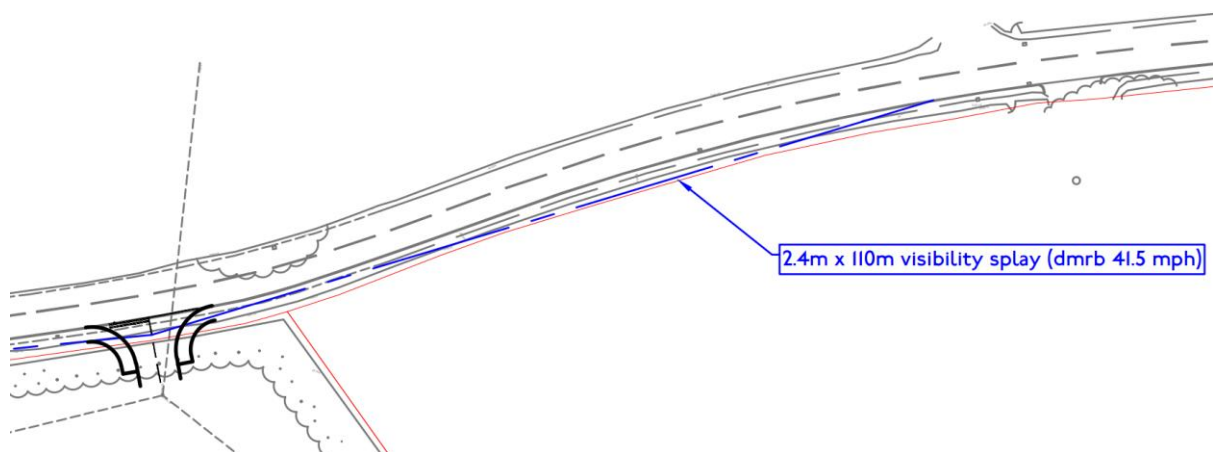
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VISIBILITY SPLAY TO THE EAST

This visibility splay requires land behind the hedgerow to the east of the application site. An extract from Modes' drawing (number J32-8018-PS-001 rev D). This is not within the public highway and should therefore be included in the red line boundary.



The Title boundaries of the application and adjacent land have been reviewed and it appears these are inaccurate and have been manipulated to suggest that the visibility splays are all within the public highway (because they are not within the title of a land owner).

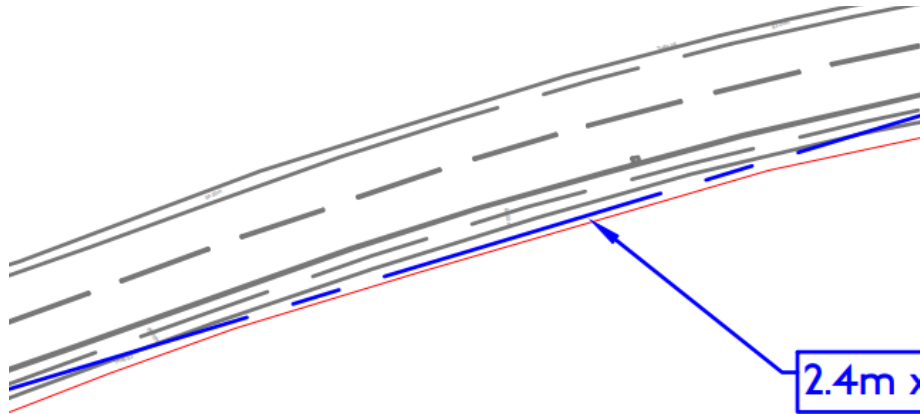
The accuracy of the Title boundaries are disputed for two reasons. The first reason is the boundary overlay on Modes' drawing (number J32-8018-PS-001 rev D). An extract below shows the Title boundary in red, which is positioned further into the land to the east of the application site, behind the existing hedgerow. This is positioned conveniently behind the visibility splay to suggest it is public highway land.

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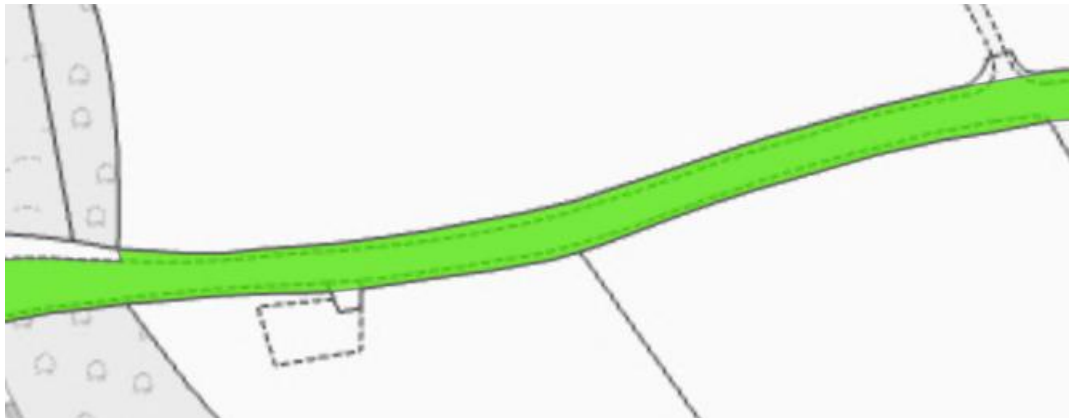
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The Title boundary above therefore conflicts with the Highway Authority records on public highway extents. An extract is shown below, the public highway area is shaded green and shows only a narrow offset from the road edge, significantly different from the applicant's representation of the boundaries.

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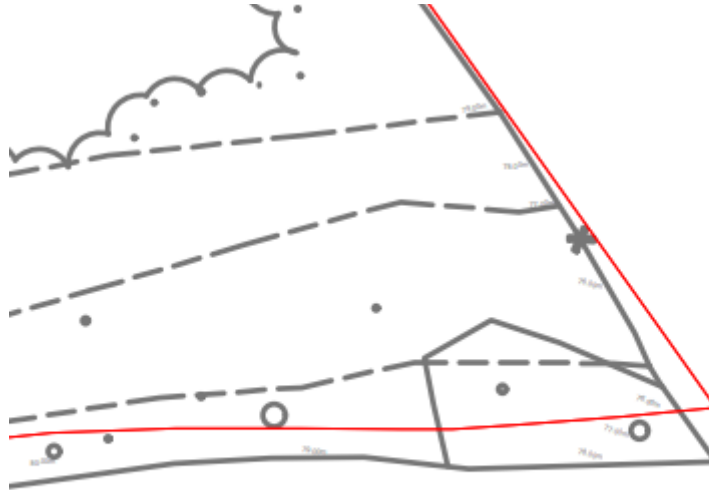
Inaccurate Title boundaries are confirmed following inspection of other areas of the applicant's drawings. An extract below of the south eastern area of the application site highlights this inaccuracy when overlaying onto the topographical survey.

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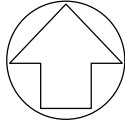


CONCLUSION

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In conclusion the planning application does not satisfactorily address any highway safety concerns for the following reasons:

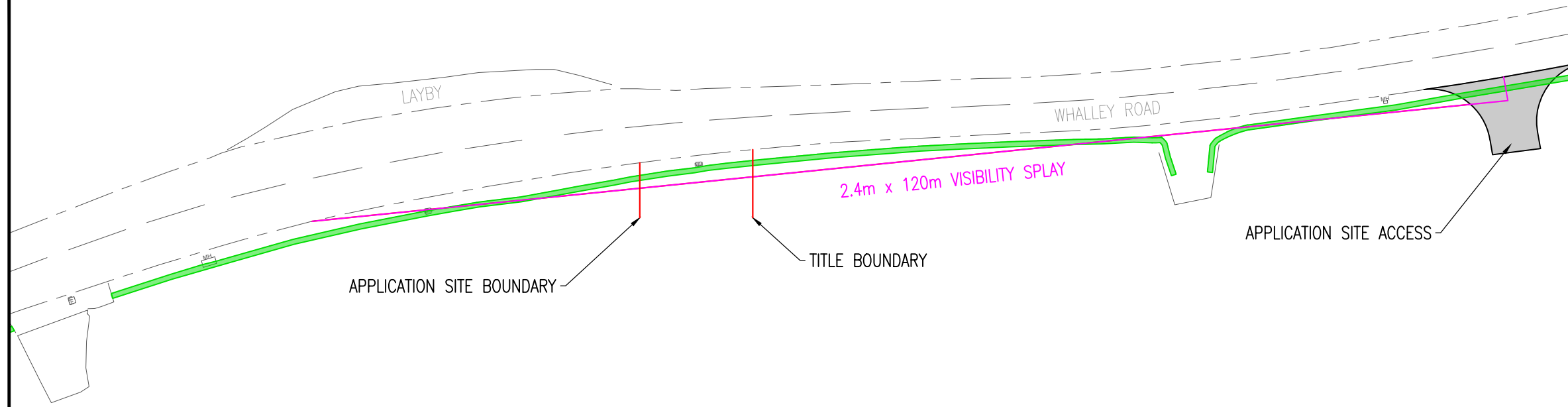
- The visibility splay to the west has not been assessed correctly and compliant lengths are not available due to the vertical alignment of Whalley Road.
- The visibility splays rely on hedgerow maintenance which is considered to be impractical and unenforceable. A 250m section of hedgerow will need to be lowered to less than 300mm high.
- The visibility splays require land which is not within the control of the applicant.
- Obstructed visibility splays raise highways concerns which have a significant impact on the safe operation of the public highway.



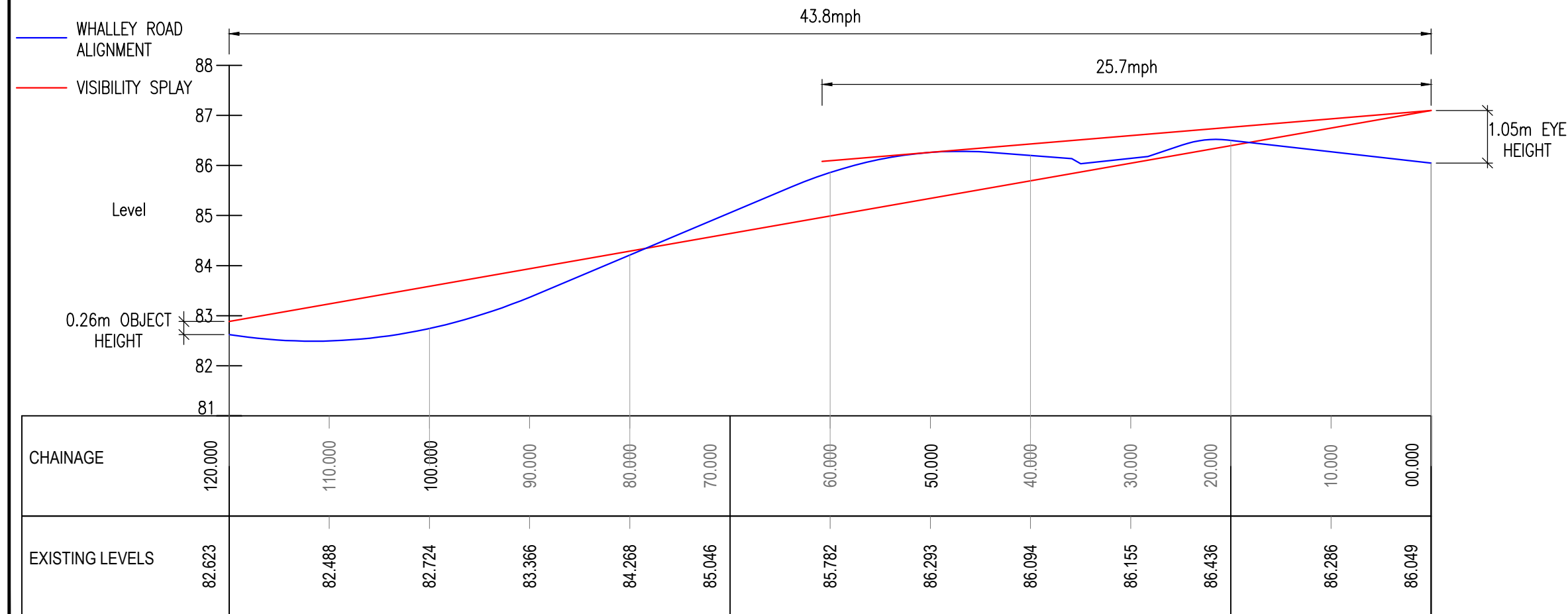
DO NOT SCALE

KEY:

HEDGEROW (APPROXIMATE LOCATION, EXACT THICKNESS UNKNOWN)



VISIBILITY SPLAY TO THE WEST (SCALE 1:500)



VERTICAL VISIBILITY LONG SECTION (SCALE 1:100H, 1:500V)

P01	30/03/2026	HT	FIRST ISSUE	LC
REV	DATE	BY	DESCRIPTION	APP

DRAWING STATUS: S0 - WORK IN PROGRESS



PROJECT: WHALLEY ROAD, HURST GREEN

TITLE: PROPOSED VISIBILITY SPLAY (WEST OF PROPOSED SITE ACCESS)

DRAWN: HT	APPROVED: LC	DATE: March 26
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DRAWING No: 26044-SK-01	SCALE @ A3: AS SHOWN	REV: P01
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