BTG Eddisons

TRANSPORT STATEMENT

Proposed Educational Facility

Whitemoor Centre

John O'Gaunts Way

Belper

July 2026

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1 Introduction

1.1 Preamble

1.1.1 Eddisons have been commissioned by Esteem Multi Academy Trust (MAT) to produce a Transport Statement (TS) to assist the Local Planning Authority's determination of a planning application for the refurbishment of the Whitemoor Centre at 100, John O'Gaunts Way in Belper, to be used as part of the Academy.

1.1.2 More specifically, the proposals refer to the:

'Full refurbishment and internal reconfiguration of existing building to form new Special Educational Needs (SEN) provision, including replacement of roof, windows and doors, installation of solar panels, addition of a canopy and access ramp, and demolition of existing outbuildings to provide new parking provision and outdoor play areas'.

1.1.3 The Local Highway Authority (LHA) responsible for Belper is Derbyshire County Council (DCC), whilst Amber Valley Borough Council (AVBC) are the Local Planning Authority (LPA).

1.2 Scope of Report

1.2.1 Following submission of the planning application (App. Ref no. AVBC/2026/015939) to AVBC, comments have been received from DCC and are contained within **Appendix 1**.

1.2.2 As advised in the comments:

'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 the application is deferred pending additional information'.

1.2.3 In their conclusions, DCC confirmed that:

'The LHA does not consider that the application as submitted fully assesses the highway impact of the proposed development and further information is required as set out in this response'.

1.2.4 The response goes on to say that '*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'.*

1.2.5 The previously submitted Transport Statement (TS) has therefore been updated to take account of the comments raised to ensure that all matters are satisfactorily addressed, to allow the LHA to support the application and provide a positive recommendation on highway grounds.

1.2.6 Following resubmission of the TS, further comments (dated 8th October 2026) have been received from DCC and as such, this document has been updated to address each of the additional points raised.

1.2.7 As was previously, each point raised by DCC will be addressed in the appropriate Section of the Report.

1.2.8 A Travel Plan Framework was also submitted as part of the Application package. This was acknowledged by SCC, who advised in their response that *'TS Appendix 3 includes the TPF. Specialist colleagues have been consulted on the TPF, and their observations will be reported when available'.*

1.3 Format of Report

1.3.1 Following this introduction, Section 2 describes the site and provides details relating to existing operations at the site, as well as existing travel information.

1.3.2 Section 3 sets out the development proposals, including vehicular access and the proposed drop-off/pick-up arrangements.

1.3.3 Section 4 discusses the accessibility of the site by non-car modes, including walking, wheeling, cycling and public transport.

1.3.4 As attendees at the school will be Special Educational Needs and Disabilities (SEND), Autism Spectrum Disorder (ASD) with associated Education, Health and Care (EHCP) for severe learning difficulties, the consideration of the use sustainable modes will focus on staff travel, rather than pupils. ASD is a recognised area of need within the SEND framework, requiring tailored support for communication, social interaction and learning.

1.3.5 Section 5 considers the traffic impact of the proposals, whilst Section 6 draws together the reports' findings and conclusions.

1.4 Relevant Planning History

1.4.1 This application proposes the full refurbishment of the existing Whitemoor Centre to form new SEN provision with 9no. classrooms and ancillary spaces. Existing outbuildings are to be demolished to form new parking provision and outdoor play areas.

1.4.2 It is noted that the site has recently (2024) been subject to a previous education related application (App. Ref no. PDR/2024/0043).

1.4.3 It is understood the LHA raised no objection to that application, which sought determination, if prior approval was required, for the proposed creation of a school in the Whitemoor Centre.

1.4.4 This Report serves to uphold that position.

2 Development Site

2.1 Existing Site

2.1.1 The Whitemoor Centre is situated on the eastern side of John O'Gaunts Way, approximately 1.5 kilometres to the east of Belper town centre.

2.1.2 The location of the site in relation to the surrounding local area is shown in **Plan 1**.

2.1.3 An approximate red line boundary for the Whitemoor Centre site is shown in **Figure 2.1** below, whilst the neighbouring Holbrook School for Autism is identified by the blue line boundary.



Figure 2.1 – Approximate Red Line Boundary

2.1.4 There are currently 3no. means of access serving the Whitemoor Centre and Holbrook School for Autism, all taken directly off Jonh O'Gaunts Way.

2.1.5 The northernmost access is shown in **Figure 2.2** below.



Figure 2.2 – Northen Access off John O'Gaunts Way

2.1.6 This northernmost entrance provides access to a servicing area and a small car park, however, this entrance/exit is kept locked at all times and so is not currently in use.

2.1.7 The other two means of access (located further south) form a loop around an existing 'grass mound' and operate as a one-way system (in a clockwise direction) i.e. vehicles enter via the middle entrance and exit via the one furthest south. These access points serve both the Whitemoor Centre and Holbrook School for Autism and provide access to 6no. existing parking spaces, as shown in **Figure 2.3** below.



Figure 2.3 – Main Vehicular Entrance to Whitemoor Building and Holbrook School

2.1.8 This area is currently used as a drop-off/pick-up area for both Whitemoor Centre and the Holbrook School for Autism. However, the use of this entrance (other than for drop-offs/pick-ups) is restricted to staff and emergency access only.

2.1.9 The Holbrook School for Autism lies directly to the south of the Whitemoor Centre and its' car park is accessed off the loop road, as shown in **Figure 2.4** below.



Figure 2.4 – Entrance to Holbrook School for Autism Car Park

2.1.10 The Holbrook School for Autism car park is located to the rear of the building and has approximately 21no. spaces.

2.1.11 Holbrook School for Autism is an existing specialist school for children/young adults with autism and learning disabilities. It is part of the Esteem Multi-Academy Trust and provides places for pupils aged between 4 and 19.

2.2 Local Highway Network

2.2.1 As detailed above, the Whitemoor Centre is currently accessed from John O'Gaunts Way, which connects to Whitemoor Lane at a point approximately 750 metres to the north of the site. To the south, John O'Gaunts Way links to the A609 Kilbourne Road.

2.2.2 To the west of the site, the A517 Ashbourne Road and the A6 Derby Road connect the site to Ashbourne, Duffield and Derby and to the wider strategic road network.

2.3 Existing Operation

2.3.1 The Whitemoor Centre is currently operating as a school, however, due to the existing condition of the building, it is not fully operational and only has 2no. functioning classrooms.

2.3.2 These classrooms are currently used as overspill teaching space for the Holbrook School for Autism and so are managed by Holbrook School for Autism.

2.3.3 In light of the above, any existing data provided within this Report includes existing activities and operations at both sites.

2.3.4 **Table 2.1** below shows existing staff and pupil numbers across both sites:

Members of Staff	Pupils
36	**58**

Table 2.1 Existing Number of Staff and Pupils

2.3.5 There are currently 36 teaching staff, across the two sites, with an extra 3no. staff on site to cover the lunchtime period. The total number of existing pupils is currently 58.

2.3.6 No teaching staff (or pupils) currently use the building entrance to the Whitemoor Centre. All staff and pupils use the Holbrook School entrance.

2.3.7 Pupils required to access one of the 2no. functioning classrooms at the Whitemoor Centre enter via the Holbrook building and are escorted by a member of staff to the Whitemoor Centre for lessons to begin. Similarly, at the end of the school day, they are escorted back to the Holbrook building, ready for pick-up by minibus/taxi or parents.

2.4 Existing Travel

2.4.1 This Section of the report deals with existing travel patterns of staff and pupils at both sites.

2.4.2 It should be reiterated however, that the highly bespoke nature of the school means all students are considered vulnerable and are therefore unable to travel independently, either on foot, cycle or by public transport.

2.4.3 In their response, DCC commented that:

'It is not clear what sources have been used for the travel data in the TS or whether there are any existing travel surveys. The applicant should substantiate the claimed trip generation'.

2.4.4 With the above in mind, updated travel mode information has been provided for all existing staff and pupils.

2.4.5 All of the information contained in this Report has been obtained by the School Business Manager at the Holbrook School for Autism, who currently manage both the Holbrook School and the Whitemoor Centre.

2.4.6 The existing modal split of staff and pupils is provided in **Table 2.2** below.

Mode	Staff	Pupils
Car Driver	33	-
Car Share	0	-
Public Transport	0	-
Walk	1	-
Cycle	2	-
Minibus/Taxi	0	50
Parent Drop Off	0	8
Total	36	58

Table 2.2 Existing Modal Split of Staff and Pupils

2.4.7 As can be seen in the Table above, around 33no. staff currently drive to work, whilst 3no. staff either walk or cycle, but not regularly.

2.4.8 At present, 50no. pupils arrive/depart by taxi/minibus, whilst the other 8no. pupils are dropped off and picked up by parents' vehicles.

2.4.9 Pupils dropped off by mini-bus/taxi's can incur travel times of over 30 minutes or more, with many being transported from all over Derbyshire.

2.4.10 However, it should be noted that not all of these are single occupancy trips. The actual number of mini-bus/taxi trips during drop-offs and pick-ups is between 35 and 40 vehicles.

2.5 Staff/Pupil Arrival and Departure Times

2.5.1 It has also been confirmed with Holbrook School that the first member of staff arrives around 6am, whilst other staff arrivals take place throughout the day from about 7.00am onwards, with the last staff members locking up at around 6.00pm.

2.5.2 The busiest times in terms of staff arrival and departures are as follows:

- Staff arrive between 8.00 and 8.30am; and
- Staff leave between 3.15pm and 4.15pm

2.5.3 The following can be confirmed in terms of pupil arrival and departure times:

- Pupils arrive between 8.45am and 9.15am; and
- Pupils are picked up between 2.45pm and 3.15pm

2.5.4 The current practice of staggering staff and pupil arrivals and departures, as confirmed above reduces the number of vehicles on site at any one time and this will continue to be the case.

2.5.5 None of the existing pupils are able to travel independently.

2.5.6 Indeed, information received from the Holbrook School advises that:

'All students are SEND (ASD) with associated EHCP for severe learning difficulties which presents a challenge for students managing their own safety and increased vulnerabilities. Travel plans that included walking cycling or public transport would present significant risk therefore are not viable options for any of our cohort'.

2.5.7 This is reiterated in the Travel Plan for the site and means any attempt to influence or encourage the use of sustainable modes of travel has to be focused on staff only, rather than pupils.

2.5.8 In their response, DCC noted that *'Para 4.2.9 notes that there are approximately 27 members of staff on any given day, with a further 3 working across lunch, presumably in addition to the additional 50 no. staff proposed. It is noted that there is currently sufficient parking on site for all staff, with limited visitor parking'*.

2.5.9 And the response goes on to say that:

'It is not clear from the submission whether existing staff parking is located within the planning application "red line" boundary or the "blue line" boundary. Clarification is required.

Para 4.2.8 indicates that the adjacent Holbrook Centre will manage the new development. It is not clear whether this is where existing staff and parking spaces are located. Clarification is required'.

2.5.10 As will be detailed in the following Section, a new car park comprising 42no. spaces will be provided to the north of the site and be accessed by the northernmost entrance (currently locked and unused).

2.5.11 The reconfigured access arrangements result in one of the existing spaces to the front of the Whitemoor Centre building being lost, however a total 5no. spaces including an accessible bay will be provided. This results in a total of 47no. spaces for staff at the Whitemoor Centre.

2.5.12 Car parking for staff at the Holbrook School (21no. spaces) will continue to provide adequate parking, as it does at present and based on current information, visitors to the site are infrequent, given the bespoke nature of the school and the needs of its pupils, hence there is no real demand for visitor parking.

2.5.13 In regard to parking, the SCC response noted that:

'A new car park is proposed in the northern part of the site, providing 42 spaces. Reconfigured access arrangements at the front of the Whitemoor Centre would result in one of the existing spaces there being lost, but 5 spaces would remain. The Holbrook School car park is proposed to be retained and the TS states that it includes 21 spaces, although no plan indicating its location or the configuration of spaces has been submitted. Details are required'.

2.5.14 The existing layout of the Holbrook School Car Park is presented in **Figure 2.5** below.

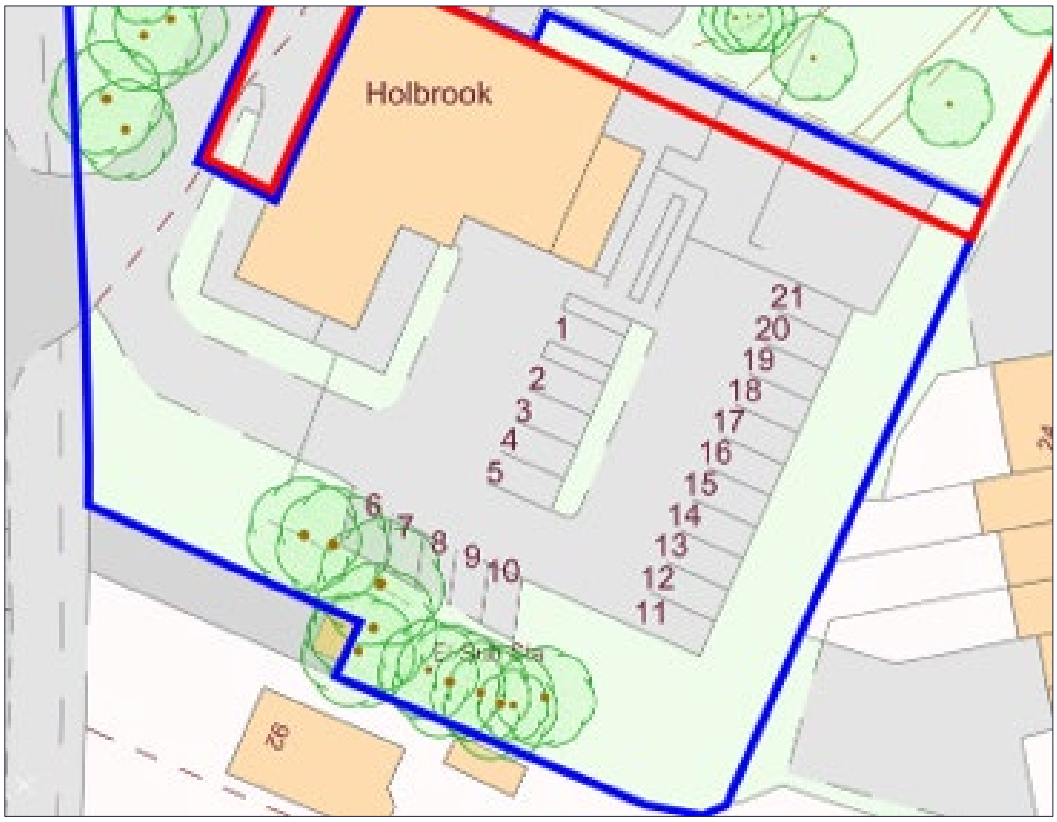


Figure 2.5 – Layout of Holbrook School Car Park (21no. Spaces)

2.5.15 As can be seen above, the existing car park at Holbrook School can accommodate up to 21no. vehicles.

3 Development Proposals

3.1 Proposed Development

3.1.1 The DCC response states that *'A TS (dated 30/7/25) has been submitted in support of this application. Specific comments on the TS are summarised below, using the paragraph numbers in the TS for reference'*.

3.1.2 A number of points are raised, but essentially, DCC requested more clarification on the proposals, existing travel patterns and details regarding existing staff arrival/ departure times. This has been provided in the previous Section.

3.1.3 The proposals relate to the retention and complete refurbishment of the existing Whitemoor Centre building, including internal reconfiguration which is intended to be an expansion for the Holbrook School for Autism, that will be operated and managed by them.

3.1.4 The proposed site layout is presented in **Plan 2** and shows new surface car parking for 42no. cars, including 2no. accessible bays, located to the north of the site and 5no. spaces including 1no. accessible bay at the building frontage.

3.1.5 It can be confirmed that the refurbishment of the existing school to accommodate 9no. new classrooms will result in an additional 100no.pupils and around 50no. staff.

3.1.6 The subsequent traffic impact of these increases will be discussed in Section 5.

3.1.7 In their most recent response DCC states that:

'Clarification was sought from the applicant as to how the proposal related to the adjacent Holbrook School and the existing and proposed staffing and pupil numbers. TS para 3.1.3 states that the proposal is for "the retention and complete refurbishment of the existing Whitemoor Centre building … which is intended to be an expansion for the Holbrook School for Autism, that will be operated and managed by them." The LHA therefore assumes that the Holbrook School and Whitemoor Centre will function as one'.

3.1.8 And goes on to say that:

'Para 2.3.5 states that "there are currently 36 teaching staff, across the two sites, with an extra 3 no. staff on site to cover the lunchtime period. The total number of existing pupils is currently 58." Para 3.1.5 confirms that "the refurbishment of the existing school to accommodate 9no. new classrooms will result in an additional 100 no. pupils and around 50 no. staff." As such the new combined Holbrook School and Whitemoor Centre will have 86 (plus 3 to cover lunchtime) staff and 158 pupil.

No details have been provided as to whether any lunchtime staff are included within the extra 50 staff or whether they would be additional. Clarification is required'.

3.1.9 It can be confirmed that 3no. additional staff working across the lunchtime period, and these staff are included in the existing number of staff (50no.) for Holbrook, with no additional staff required.

3.2 Proposed Access and Drop-Off/Pick-Up Facility

3.2.1 In regard to vehicle access, DCC noted that the previous TS stated that:

'Existing accesses associated with the site are not proposed to be altered as part of development.

3.2.2 In that regard, DCC stated that *'Whilst this would appear to be the case within the highway limits, the proposed drop-off area introduces a new arrangement, requiring changes to internal site access arrangements'.*

3.2.3 The original statement in the submitted TS simply referred to the fact that the 3no. existing points of access off John O'Gaunts Way were being retained in their current form.

3.2.4 Notwithstanding the above however, DCC went on to advise that '*The three vehicular accesses from the site onto John O'Gaunts Way should take the form of dropped kerb footway crossings to maintain pedestrian priority along the eastern footway on John O'Gaunt's Way. Details are required'.*

3.2.5 In order to address the above comment, the proposed site access arrangements, including the dropped kerb footway crossings referred to above are shown in **Plan 3**.

3.2.6 The DCC response also raised concern as to how the proposed drop-off and pick-up arrangements would work on the ground and commented that:

'It is not clear how the drop-off facility junction with the looped access which serves the site to the south works in practice. The applicant should clarify whether drivers leaving the site are expected to route around the southern access road loop, adjacent to Holbrook School, to join John O'Gaunt's Way to the south of Holbrook School'.

3.2.7 Plan 3 shows that all staff and pupil drop-off/pick-up traffic would enter via the northernmost access point off John O'Gaunts Way, as previously identified in Figure 2.2 in Section 2.

3.2.8 Staff vehicles wishing to park will simply proceed through the gates and turn left into the new surface car park.

3.2.9 For minibuses/taxi's and parents' vehicles dropping pupils off, the new arrangements will mean vehicles will enter via the northernmost entrance and then turn right prior to the gates. Vehicles will then proceed along one of the 2no. stacking lanes provided, as identified in **Figure 3.1** below, where they will wait until the drop off zones at the southern end of the stacking lanes are available.

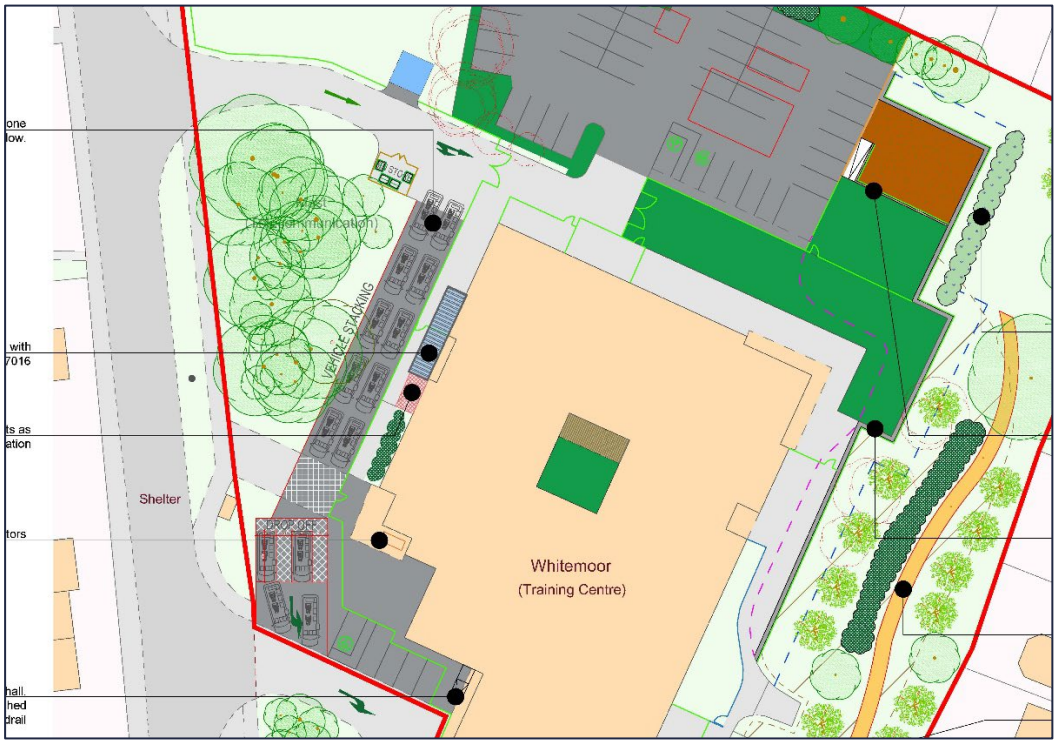


Figure 3.1 - Drive-Through Lanes and Stacking System

3.2.10 Once their passengers have alighted (or boarded) the vehicle, they will continue southwards and must then give-way to any oncoming traffic entering via the middle entrance, before turning left and following the road around the 'grass mound'.

3.2.11 Vehicles will then follow the road round and exit the site via the southernmost access onto John O'Gaunts Way.

3.2.12 At that point, vehicles will be able to turn left or right onto John O'Gaunts Way, depending on their destination.

3.2.13 The proposed new one-way system will be controlled by appropriate carriageway markings and signage at the give-way line at the southern end of the drop off/pick up lanes, as indicated in Plan 3.

3.2.14 The DCC response also stated that:

'Further information is required to demonstrate how the drop-off facility will work in practice, including details of how much time will be taken to discharge students/multiple students from the various types of vehicles being used'.

3.2.15 Based on existing practices at the site the durations of alighting and boarding are as follows:

- Pupil by minibus/taxi - 2 minutes; and
- Pupil by parent vehicle - 1 minute.

3.2.16 In their response DCC also requested clarification in regard to existing pupils and said:

'It is not clear whether existing students will be expected to use the proposed drop-off/stacking facility, if not where they will be dropped off, and how such activity will interact with the proposed drop-off/stacking facility.'

3.2.17 And that:

'It is not clear whether existing trips use the loop to the south of the site, whether this is used as a drop-off facility, or whether this arrangement will alter because of the proposed development'.

3.2.18 As already detailed, at present the one-way system around the 'grass mound' is used by all pupils being dropped off or picked up, whether attending the Whitemoor Centre or Holbrook School.

3.2.19 It can be confirmed that the new drop-off/pick up and stacking lane arrangements will be used by all existing and new pupils.

3.2.20 The new drive-through lanes and stacking facility will simply replace those existing movements (around the 'grass mound'), with all vehicles entering via the northernmost access and heading south through the stacking lanes to the drop-off zone.

3.2.21 All existing and new pupils will be dropped off using the new vehicle stacking system where 2no. traffic lanes are provided, so as soon as one of the drop off zones becomes available, the next vehicle can proceed and start the alighting process.

3.2.22 DCC raise further concerns in regards to how the new arrangements will be controlled. The DCC response advised that *'Analysis is required to demonstrate how the proposed vehicle drop-off/stacking facility will function in practice, together with submission of details to confirm how the facility will be managed'*.

3.2.23 It can be confirmed that there will be staff on site (as there is at present) to manage traffic flow and the disembarking/collection of pupils from the taxis/ minibuses/parents' vehicles.

3.2.24 In that regard, the Applicant is willing to accept a suitably worded planning condition to provide a Traffic Management Pan (TMP).

3.2.25 Once the pupil and staff intake for the new facility is established and the intended travel arrangements of pupils is known, the TMP will be amended to ensure it can adequately cater for drop-offs and pick-ups at the site. This will ensure there is no detrimental impact to the adjoining public highway or general road safety.

3.2.26 The TMP will be reviewed on a regular basis to ensure it is kept up to date, should there be an increase in the number of parents dropping off pupils for example.

3.2.27 In relation to the submitted TMP, the SCC response stated that:

'The TMP relies on, and must be consistent with, the TS. Given the above observations on the TS, which give rise to the need for further information, the LHA considers that the TMP should be reviewed alongside the review of the TS.

Observations on the TMP are therefore limited at this stage to the following points:

1. TMP section 3.0 states that "Entry can be temporarily regulated at the northern access to ensure no queue extends onto John O'Gaunts Way." The applicant should explain how this would work in practice.

2. The applicant should confirm that a planning condition to prevent deliveries and servicing during arrival and departure periods will be acceptable.

The TMP will be reviewed again following amendments to the TS to address the earlier observations'.

3.2.28 The TMP has been updated and now reflects the information contained within the TS and is included at **Appendix 2**.

3.2.29 In terms of the actual design of the new drop off facility, in their response DCC noted that:

'The drop-off facility has a width of circa 6m. The applicant should demonstrate whether this is sufficient to accommodate the vehicular and pedestrian demands, including for mobility impaired people, particularly if the facility is to be used by minibuses'.

3.2.30 To better understand the point being made above, the previously proposed drop-off point is shown on the left in **Figure 3.2** below, whilst the currently proposed drop-off point is shown on the right.



Figure 3.2 – Previously Proposed and Currently Proposed Drop-Off Zones

3.2.31 As shown above and in Plan 2, the drop-off zone has been widened from 6 metres to approximately 8.5 metres. It provides 2no. bays of approximately 2.4 metres in width, which is wide enough to accommodate a minibus and provides a hatched area for each bay of around 1.8 metres to assist in getting pupils (including those in wheelchairs) out of the vehicle/s. This will therefore cater for a worse-case scenario i.e. where two minibuses are present in the drop-off zone at the same time and is therefore deemed to be sufficient.

3.2.32 It is considered that the above information addresses all of the matters raised by DCC and provides clarification on how the new pick-up and drop-off facility will work in practice.

3.2.33 Notwithstanding the above, in their most recent comments, DCC noted that:

'The existing use of the accesses is explained in para 2.1.6. The northernmost access is "kept locked at all times and so is not currently in use". Para 2.17 continues "the other two means of access (located further south) form a loop around an existing 'grass mound' and operate as a one-way system (in a clockwise direction) i.e. vehicles

enter via the middle entrance and exit via the one furthest south". It remains unclear what the proposed use of each access will be'.

3.2.34 It can be confirmed that the main site entrance will be the most northern entry point (currently locked and not used) for staff and pupil drop off. The middle entrance will only ever be used for deliveries, which would take place outside of the drop off times. The southern access point will be egress only for all vehicles exiting the site.

3.2.35 The response also says '*Para 3.2.7 states that "all staff and pupil drop-off/pick-up traffic would enter via the northernmost access point off John O'Gaunts Way". However, para 3.2.10 refers to traffic which, having used the drop off zone, must "give-way to any oncoming traffic entering via the middle entrance". Clarification is required as to whether the middle access will be used and if so, what vehicles will use which access*'.

3.2.36 Again, it can be confirmed that this situation would only ever be the case outside of start and finish times when deliveries are being made and so would not conflict with drop off or pick ups.

3.2.37

3.2.38 Figure 3.1 and a site plan appended to the TS indicate a one-way system through the site with all traffic leaving via the southern exit. However, it is not clear whether cars parked in the new northern car park would have to drive through the site or would be able to use the northern access to exit. The applicant should clarify this. Staff to exit through northern boundary as will be outside of pick up and drop off times.

3.3 Car Parking

3.3.1 In their response and in regard to parking provision, DCC refer to the previously submitted TS and noted that:

'Para 2.3.2 states that "…the facility will provide adequate provision for parking and suitable arrangements for pick up and drop off without impacting the wider highway network". No proof has been provided to substantiate this claim'.

3.3.2 The DCC response then provides comments on the internal layout of the site, which will be dealt with in the same order as they appear in the response for ease.

3.3.3 In respect to the internal layout of the site DCC advised that:

'Para 6.1 of the highway authority's Parking Guidance for New Developments (PGND) requires parking provision of up to 1 space per member of staff. Whilst the level of proposed car parking provision (50 spaces, including 2 disabled spaces and 1 electric charging) is considered acceptable for the proposed development it is not clear where existing staff parking is located. It is assumed that this is separate from the proposed parking areas, but it should be clearly demonstrated, together with confirmation of the level of existing parking provision relative to existing staff levels'.

3.3.4 The response goes on to day that *'Additional information together with a revised site plan is required, to clearly demonstrate sufficient parking provision for both existing and proposed staff levels'.*

3.3.5 The response also advises that:

'PGND para 6.1 notes that drop-off areas are not normally accepted as they do not represent the promotion of sustainable travel and encourage vehicle trips. However, in view of the specialised nature of the proposed development, the LHA considers that provision of a drop-off area is, in this instance, acceptable in principle'.

3.3.6 It is proposed to provide a new surface car park to accommodate 42no. cars, including 2no. accessible spaces, to cater for the new staff on site. Existing Holbrook School staff will continue to park within their own dedicated car park.

3.3.7 There are currently 6no. spaces to the front of the Whitemoor Centre, but no accessible bays. This area will be reconfigured to accommodate the new drop-off zone and so 1no. existing space will be lost. The reconfigured layout will provide 1no. accessible bay resulting in 5no. spaces being provided.

3.3.8 A total of 47no. spaces will therefore be provided.

3.3.9 The requirement of 1 space per member of staff referred to in the PGND document is a maximum requirement and so the proposed 47no. spaces, whilst slightly below this

criteria, is considered to be appropriate and sufficient to adequately cater for the needs of staff at the new facility.

3.3.10 The DCC comments also refer to cycle parking provision and note that:

'PGND para 6.2 requires secure and sheltered bicycle parking facilities to be provided, the quantum reflecting the requirements set out in LTN 1/20 (see copy extract below)

Land use type	Sub-category	Short stay requirement (obvious, easily accessed and close to destination)	Long stay requirement (secure and ideally covered)
All	Parking for adapted cycles for disabled people	5% of total capacity co-located with disabled car parking.	5% of total capacity co-located with disabled car parking.
Retail	Small (<200m²)	1 per 100m²	1 per 100m²
	Medium (200-1,000m²)	1 per 200m²	1 per 200m²
	>1,000m²	1 per 250m²	1 per 500m²
Employment	Office/Finance (A2/B1)	1 per 1000m²	1 per 200m²
	Industrial/Warehousing (B2/B8)	1 per 1,000m²	1 per 500m²
Leisure and Institutions	Leisure centres, assembly halls, hospitals and healthcare	Greatest of: 1 per 50m² or 1 per 30 seats/ capacity	1 per 5 employees
	Educational Institutions	–	Separate provision for staff and students. Based on Travel Plan mode share targets, minimum: Staff: 1 per 20 staff Students; 1 per 10 students

3.3.11 The response goes on to say that *'Drawing (90)001 shows provision for 10 no. steel "Sheffield" style cycle stands. In view of the nature of the proposed development this is considered acceptable, subject to such provision being sheltered. Details will be required'.*

3.3.12 The comments also note that: *'No details have been provided regarding service/delivery vehicle access and turning facilities. No details have been provided concerning refuse provision and access'.*

3.3.13 In response to the above, a series of swept path analyses have been undertaken for the following vehicles:

- Refuse vehicle.
- Fire appliance.

- Rigid vehicle (10m).

3.3.14 The swept path analyses undertaken are presented in **Plan 4**. It shows that refuse vehicles will enter the site, collect waste, travel down the stacking lanes and exit the site. An emergency vehicle have been shown taking the same route.

3.3.15 The delivery vehicle is shown entering the site from John O'Gaunts Way via the middle entrance, where it will make deliveries, before continuing around the one-way loop, before exiting the site from the southernmost access point and onto John O'Gaunts Way.

3.3.16 In regard to the swept path analyses presented, in their correspondence, DCC confirm that they are satisfied that:

'Swept path analysis has been undertaken demonstrating that refuse and emergency vehicles can enter the site from the northernmost access, continue through the stacking lanes, and leave the site from the southern exit. Delivery vehicles can enter the site at the middle access and leave at the southern exit'.

3.3.17 Other comments were made in regard to the provision of suitable fencing, where DCC advised that:

'On-site fencing/gates are proposed to safeguard students, in the form of 2m high weld mesh fencing. Such fencing is directly adjacent the proposed stacking facility and, with no footway provision at this point, could adversely affect access to/from vehicles. Pedestrian visibility is also constrained by the proposed fence at the crossing point. The site layout details should be reviewed to address these issues.'

3.3.18 In their latest response, DCC continue to have concerns about the proposed fencing and state that:

'On-site fencing/gates are proposed to safeguard students, in the form of 2m high weld mesh fencing. The LHA previously raised concern that such fencing is directly adjacent the proposed stacking facility and, with no footway provision at this point, could adversely affect access to/from vehicles. Pedestrian visibility is also constrained by the proposed fence at the crossing point.

Further details of the drop off routine confirm that pupils will only exit vehicles in the drop off zone. This means that pupils should be within their vehicles in the stacking lanes. If so, the installation of fencing alongside the stacking lanes is unlikely to be detrimental to the safety of pupils being dropped off/picked up.

'Fencing is still proposed by the crossing point/access to the school from the drop off zone, constraining pedestrian intervisibility where vehicles leave the stacking lanes to enter the drop off zone. Amended details should be provided'.

3.3.19 In regard to the car park layout and parking space dimensions, DCC noted that:

'Several parking spaces in the northern part of the car parking area have restrictive access.

A minimum 6m aisle width should be provided adjacent to all car parking spaces. In addition to the above, three spaces, located in the southern part of the car parking area are of limited depth, scaling at 4.6m. A minimum depth of 4.8m should be provided. Revised site layout details are required'.

3.3.20 The above points have been taken into account in the revised site layout and so have been satisfactorily addressed, albeit some (3no.) of the previously proposed spaces have had to be removed to accommodate the above requirements.

3.4 Cycle Storage

3.4.1 In regard to provision for cycles, the SCC response notes that;

'No further details have been provided regarding cycle storage, although TS para 3.3.12 states that 'it is likely that the specific details of the cycle parking provision will be conditioned.'

4 Accessibility by Non-Car Modes

4.1 Introduction

4.1.1 In order to accord with the aspirations of the NPPF, any new proposals should extend the choice in transport and secure mobility in a way that supports sustainable development.

4.1.2 New proposals should therefore attempt to influence the mode of travel to the development in terms of gaining a shift in modal split towards non-car modes, thus assisting in meeting the aspirations of current national and local planning policy.

4.1.3 The accessibility of the proposed site has been considered by the following modes of transport:

- accessibility on foot;
- accessibility by cycle;
- accessibility by bus;
- accessibility by rail.

4.2 Access on Foot

4.2.1 The nearest footways are located along both sides of John O'Gaunts Way, adjacent to the site entrance, linking to additional footways along Whitemoor Lane to the north and Kilbourne Road to the west.

4.2.2 This footway provision connects to a comprehensive network of routes within the surrounding area, where dropped kerbs and tactile paving is provided at all key junctions.

4.2.3 There are various Public Rights of Ways (PRoW) located around Belper, creating an accessible public footpath network around the proposed development for commuter or leisure trips. Public footpath 60 is located to the north of the site and connects John O'Gaunts Way in the west with Over Lane to the east.

4.2.4 To the east this footpath connects with public footpath 55 which connects with various footpaths to the north and the south.

4.2.5 There are further PRoWs located to the south of the site, the A609 Kilbourne Road, including footpath 82 which connects Kilbourne Road with Nottingham Road to the west. These footpaths create better connectivity towards the centre of Belper.

4.2.6 There are also various PRoWs to the west of the site, creating a connection around Belper School to the north, again towards the centre of Belper and White Moor.

4.2.7 The PRoWs in the vicinity of the site can be seen in purple lines in **Figure 4.1** below.

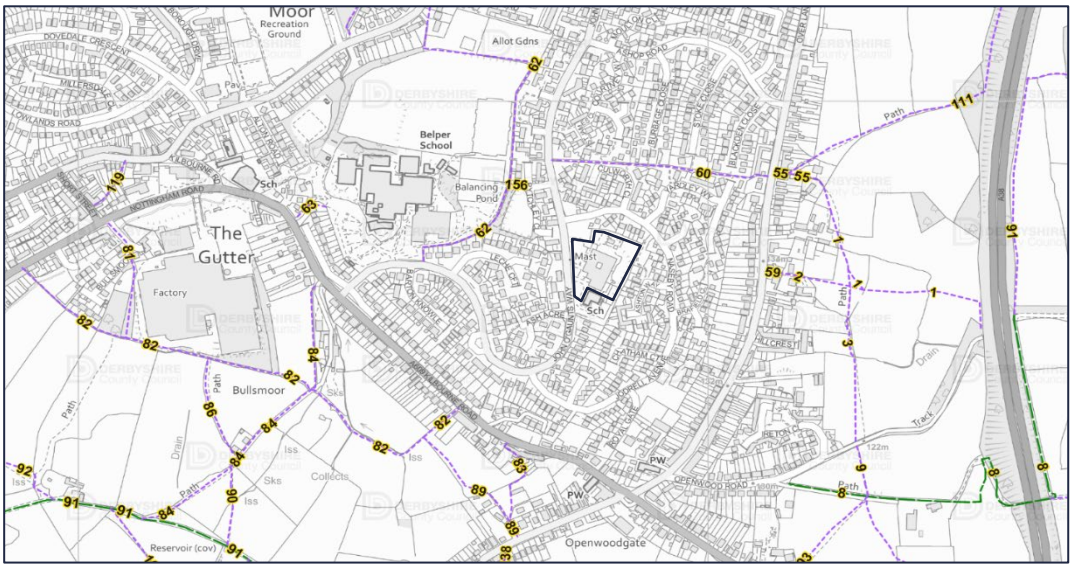


Figure 4.1 Public Right of Way in the vicinity of the site

4.2.8 Based on the review, it is considered that the existing pedestrian infrastructure will facilitate safe and direct pedestrian linkages between the site and the surrounding local area.

4.3 Access by Cycle

4.3.1 An alternative mode of travel to the site could be achieved by bicycle.

4.3.2 The importance of cycling as an alternative mode of travel both now and in the future, is demonstrated by the new rules relating to cyclists contained within the revised Highway Code, which came into force in January 2022.

4.3.3 These new rules, which include the 'Hierarchy of Users' or 'Hierarchy of Responsibility', recognise that drivers of vehicles that can cause the greatest harm in the event of a collision bear the greatest responsibility to take care and reduce the danger to others.

4.3.4 This together with the simplification of the rules, to make junctions safer and new rules to tackle dangerous overtaking will provide a road environment where cyclists and pedestrians are given priority, feel safer using the road network and further encourage travel by cycle.

4.3.5 The Cycling England document 'Integrating Cycling into Development Proposals' advises that 'For short trips, [cycle links] can give cyclists significant advantages over car users in terms of convenience and journey time… Most cycle journeys for non-work purposes and those to rail stations are between 0.5 and 2-miles, but many cyclists are willing to cycle much further. For work, a distance of 5-miles should be assumed.'

4.3.6 A distance of 8-kilometres (5-miles) is generally accepted as a distance where cycling has the potential to replace short car journeys.

4.3.7 This distance equates to a journey of around 40-minutes based on a leisurely cycle speed of 12-kph and would encompass areas including the entirety of Belper, Heanor, Little Eaton, Duffield and Ripley.

4.3.8 There are no direct national cycle routes that are in close proximity to the site, however there are a few local cycle network routes that are proposed in the area. The nearest proposed cycle route to the site is located to the west, and travels along John O'Gaunts Way to the north connecting with Whitemoor Lane and further up along more rural roads, eventually reaching Ripley.

4.3.9 Additionally, to the south of the site a proposed cycle route travels along Sandbed Lane to the west towards Cowhill and travels to the east along Openwood Road towards Denby Village. There is also a proposed cycle route to the west of the site starting from Nottingham Road which travels into the centre of Belper.

4.3.10 The proposed local cycle network in the vicinity of the site can be seen in orange lines in **Figure 4.2** below.

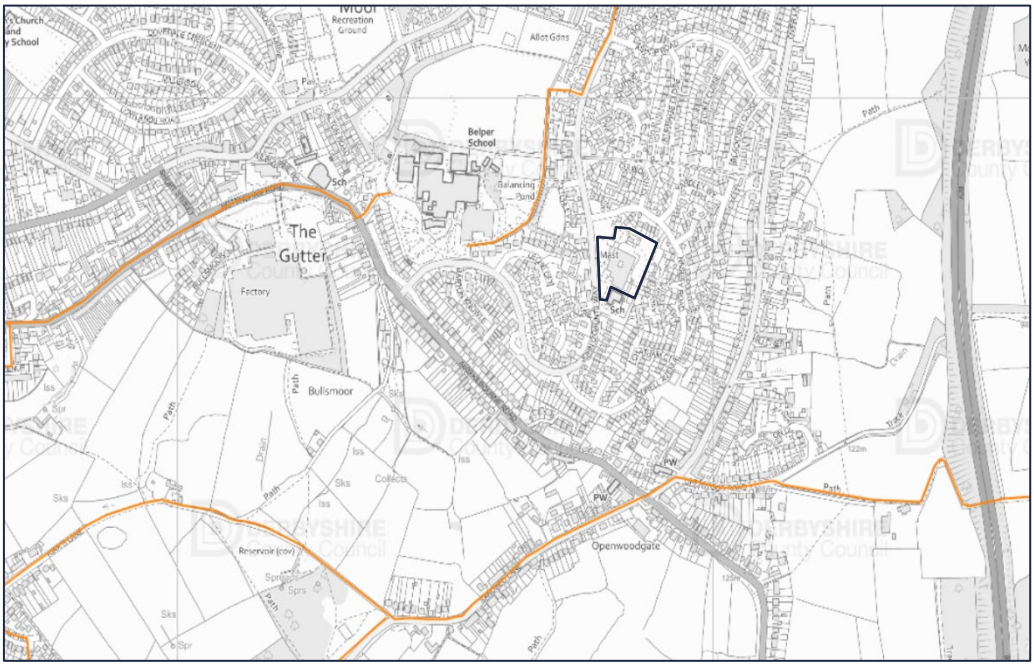


Figure 4.2 Local Cycle Network (Proposed)

4.3.11 The site can, therefore, be considered as being accessible by cycle.

4.4 Access by Bus

4.4.1 The nearest bus stops to the site are located approximately 50 metres from the site, on John O'Gaunts Way (Approx. 1-minute walk).

4.4.2 Additional bus stops are located further west of the site along John O'Gaunts Way and Kilbourne Road or to the north and east along Whitemoor Lane and Over Lane. All the nearest bus stops to the site are shown on **Plan 5**.

4.4.3 A summary of the services available from the nearest bus stops from the development site is provided in **Table 4.1** below.

Service No	Route	Monday - Friday			Saturday			Sun
		Pre 08:00	08:00-17:00	Post 17:00	Pre 08:00	08:00 -17:00	Post 17:00	
6.3 the sixes	**Derby - Ripley**	2 services	Every 60 mins	2 services	2 services	Every 60 mins	2 services	10 services
6E the sixes	**Derby - Ripley**	-	-	5 services	-	-	5 services	-
6N the sixes	**Derby - Belper Estates**	-	-	1 service (Monday - Thursday)	-	-	4 services	-
6X the sixes	**Derby - Duffield - Belper**	2 services	Every 60 mins	2 services	2 services	Every 60 mins	2 services	-
137	**St Elizabeth School -**	-	2 services	-	-	-	-	-
6.4 the sixes	**Derby - Belper Estates**	2 services	Every 60 mins	1 service	2 services	Every 60 mins	2 services	-
6.2 the sixes	**Derby - Ripley Derby -**	2 services	Every 60 mins	1 service	2 services	Every 60 mins	1 service	-

Table 4.1 Existing Bus Services Operating in the Vicinity of the Site

4.4.4 As can be seen above, the nearest bus stops to the site provides various services throughout the day to destinations such as Ripley, Derby, Belper Estates, Duffield, Wirksworth, Heage, Matlock and St Elizabeth School.

4.4.5 There are a number of bus services that serve the nearest bus stops before school starts and around the time school ends.

4.4.6 It is therefore concluded that the proposed development site is accessible by bus.

4.5 Accessibility by Train

4.5.1 The nearest train station located to the site is Belper, which is around a 34-minute walk from the site, a 10-minute cycle, or a 10-minute bus journey from service 6.3 the sixes. The station is operated by East Midlands Railway and has 2 platforms both including a visual announcement, sheltered seating area and tactile paving.

4.5.2 The station offers 2 services an hour towards Nottingham and Matlock, with Nottingham providing links to nationwide destinations. The station has 6 cycle stands, which are covered by CCTV.

4.5.3 It is therefore concluded that the proposed development site is accessible by tram.

4.6 Accessibility Summary

4.6.1 The proposals have been considered in terms of accessibility by non-car travel modes.

4.6.2 The following conclusions can be drawn from this section of the report:

- The site is well located to cater for walking and cycling trips to and from the surrounding area.
- There are frequent bus services that operate along the bus stops on John O'Gaunts Way in very close proximity to the site and as such the proposed development can be considered as accessible by bus.
- The site is accessible by train with Belper station located around a 34-minute walk away.

4.6.3 Considering the above, it is considered that the site is accessible and caters for needs of the school's staff, pupils and visitors.

4.6.4 As such, this will assist in promoting a choice of travel modes other than the private car, as set out in NPPF.

4.6.5 Notwithstanding the above, in their response DCC stated that:

'…whilst the LHA does not wholly accept the applicant's accessibility assessment, the LHA generally agrees that the site is accessible by non-car travel modes.'

4.6.6 The response goes on to advise that:

'Further comments have been requested from the County Council's Sustainable Travel team, which will be provided in due course'.

4.6.7 These additional comments are awaited, although DCC also state that:

'However, it is noted that no improvements are proposed to the existing bus stops in the vicinity of the site. Consideration should be given to the bus stop upgrades and the provision and/or improvement of pedestrian crossing facilities on the surrounding highway network'.

4.6.8 In that regard, it is noted that bus stop provision adjacent to the site is already of good standard, as shown in **Figure 4.1** below.



Figure 4.1 – Existing Bus stops adjacent to Site on John O'Guants Way

4.6.9 As can be seen above, the southbound bus stop already benefits from a shelter with seating, a bus flag pole showing timetable information for passing services. The northbound bus stop has a bus stop pole and timetable board.

4.6.10 Notwithstanding the above, SCC have confirmed in their latest response that *'The LHA will seek to secure provision of improvement schemes by planning condition'*.

4.6.11 It can be confirmed that the Applicant is willing to accept a suitably worded planning condition in that regard.

4.6.12 In their latest response, having considered that potential for non-car travel, DCC confirm that '*The LHA therefore considers that the site offers some scope for use of alternative modes of transport to the car.*'

5 Traffic Impact Analysis

5.1 Introduction

5.1.1 Having established that the development site is suitably accessible by modes of transport other than the private car, this Section considers the traffic impact of the proposals.

5.2 Proposed Development

5.2.1 The proposals relate to the retention and complete refurbishment of the existing Whitemoor Centre building, including internal reconfiguration. The refurbished building is intended to be an expansion for the Holbrook School for Autism.

5.2.2 The proposals will generate around 50no. additional staff and approximately 100no. pupils. The existing and proposed staffing levels and increase in pupils are set out in **Table 5.1** below.

Scenario	Staff	Pupils
Existing	36	58
Proposed	50	100
Total	**86**	**158**

Table 5.1 – Existing and Proposed Number of Staff and Pupils

5.2.3 As shown in Table 5.1 above, the proposed development will result in a total of approximately 86 staff and around 158 pupils.

5.2.4 In terms of traffic impact, it is likely that the majority of staff (50no.) at the new facility will travel by car, with a small number using sustainable modes of travel.

5.2.5 However, all new pupils at the facility will arrive/depart by minibus/taxi's or be dropped off/picked up by parents, as they will not fall within the mainstream setting, meaning walking, cycling and public transport will not be an option for them.

5.2.6 Whilst a Travel Plan for the site has been prepared, Holbrook School have confirmed that *'Travel Plans that include walking cycling or public transport would present significant risk and therefore are not viable options for any of the school's pupils'*. The Travel Plan will therefore focus on staff travel only.

5.2.7 It has already been confirmed in Section 2 that any new trips associated with the new pupils will occur outside the traditional peak hours, which will help to alleviate any perceived traffic issues on site.

5.2.8 In their response, DCC made the following comments in regard to trip generation.

'Vehicles dropping-off pupils appear to be expected to stack and discharge at the drop-off point formed by the four spaces at the southern end of the stacking facility'.

On the assumption that the proposal will accommodate 100 additional pupils, in addition to the current 48 students, during the AM and PM peaks (arrival: 8.45 to 9.15am; departure: 2.45 to 3.15pm) it is not clear if the proposed vehicle drop-off/stacking facility will function as intended. If not, this could result in vehicles being required to wait on the public highway, to the detriment of highway safety.'

5.2.9 The response goes on to say that *'Based on information contained within the TS, it is assumed the following:*

	Pupil Numbers	***Arrive by taxi/mini-bus (¾ of total)***	***Arrive by parent accompanied vehicles***
Currently	*48*	*36 (25 to 30)**	*12*
Additional	*100*	*75 (52 to 63)*	*25*
Combined	*148*	*111 (77 to 93)*	*37*

**Para 4.2.4 of the TS notes that 36 pupils arrive by taxi/minibus, equating to around 25 to 30 vehicles per day, due to these trips not all being single occupancy. Assuming the same is the case for the additional pupils, this will result in an additional 52 to 63 vehicles per day.*

Based on the above there are circa 37 to 42 vehicles in 30 minutes currently, with this increasing to a total of 114 to 130 vehicles due to the proposed development, in addition to staff vehicles'.

5.2.10 The calculations based on the new numbers provided are set out in **Table 5.2** below.

Scenario	Pupil Numbers	Arrive by Minibus/Taxi (Actual number due to multi-occupancy 75% to 80%)	Arrive by Parent Vehicle (Approx. 14% of total)
Existing	58	50 (37 to 40 vehicles)	8
Proposed	100	86 (65 to 69 vehicles)	14
Combined	**158**	**136 (102 to 109 vehicles)**	**22**

Table 5.2 - Proposed Trip Generation (Pupils)

5.2.11 As can be seen above, the new facility will generate somewhere in the region of 158no. pupil trips (136 minibus/taxi plus 22 parent vehicle) if no account is taken of the trips by multi-occupancy vehicles.

5.2.12 As already confirmed, drop off and pick-up periods will be carefully managed by staff on site, as set out in the Traffic Management Plan (TMP) contained within Appendix 2.

5.2.13 Notwithstanding the above, consideration has been given to how the stacking lanes and drop-off zone would work in practice.

5.2.14 The calculations assume all trips are single occupancy and so can be considered to be robust.

5.2.15 The capacity (in minutes) of the proposed stacking lanes and drop off zone based on the durations of drop-offs and pick-ups has been calculated as follows:

Total number of spaces in stacking lanes = 10
Total number of spaces in drop off zone = 2
Drop-offs and pick up durations = 30 minutes
Time taken for pupils to alight/board taxi/minibus = 2 minutes
Time taken for pupils to alight/board parent vehicle = 1 minute
Time available at stacking lanes/drop-off zone (30 minutes x 12 spaces) = 360 minutes

5.2.16 As detailed above, based on the proposed stacking lane/drop off zone arrangement, the time available for drop-offs and pick-ups equates to a total of 360 minutes.

5.2.17 The above calculations have been applied to the combined total of vehicles set out in Table 5.2 above and results in the following:

136 minibus/taxi x 2 minutes = 272 minutes
22 parent vehicles x 1 minute = 22 minutes
Total minutes = 294 minutes

5.2.18 As detailed above, the drop-off/pick-ups based on the projected numbers of pupil trips can be undertaken in 294 minutes, less than the available 360 minutes, meaning the anticipated levels of traffic can easily be accommodated within the curtilage of the site.

5.2.19 This demonstrates that the new stacking lane and drop-off system will function as intended and not give rise to any highways or road safety issues.

5.3 Traffic Impact Summary

5.3.1 This Section of the Report has considered the impact of the proposals in transport terms.

5.3.2 It is acknowledged that the majority of new staff are likely to drive to work, however, with the exception of a few parent vehicles, all new pupils will arrive/depart by mini-bus or taxi. Such vehicles can be considered to be sustainable modes, as they are not new trips, they are vehicles already on the road network.

5.3.3 As already confirmed, drop-offs and pick-ups will take place outside the traditional peak hours, when background traffic flows are lower, thus minimising the potential for any impact on the adjoining highway network.

5.3.4 It has been demonstrated that the proposed new access arrangements and stacking system for drop-off and pick-ups will operate as intended and ensure all vehicles can be accommodated within the site.

5.3.5 It can also be confirmed that drop-offs and pick-ups will be carefully managed by staff on site each morning and afternoon in line with the TMP.

5.3.6 In regard to trip generation, the SCC response states that:

'No details have been submitted as to how lunchtime staff travel to and from the site'.

5.3.7 And goes on to say that *'Section 2.5 confirms existing staff and pupil arrival times at Holbrook School, with staff arriving from 6am to 8:30am (busiest time 8am to 8:30am) and leaving from 3:15pm to 6pm (busiest time 3:15pm to 4:15pm). Pupils arrive between 8:45am and 9:15am and leave between 2:45pm and 3:15pm. Para 2.5.4 states that "The current practice of staggering staff and pupil arrivals and departures … reduces the number of vehicles on site at any one time and this will continue to be the case.'*

5.3.8 However, having reviewed the data provided, the response confirms that:

'The LHA considers that due to the staggered nature of trips to and from the site the proposal is unlikely to give rise to a severe impact on the transport network beyond the immediate vicinity of the site'.

5.3.9 However, it can be confirmed that the additional 3no. staff covering the lunchtime period tend to reside locally and therefore simply walk.

6 Conclusions

6.1.1 Eddisons have been commissioned by Esteem Multi Academy Trust to produce a Transport Statement (TS) to assist the Local Planning Authority's determination of a planning application for a new educational facility at the Whitemoor Centre in Belper.

6.1.2 The nature of the development, catering for children and young adults with special educational needs means influencing travel behaviour will be limited to staff. However, the Applicant remains committed to delivering a sustainable development and will endeavour to minimise travel by the private car, where practical to do so.

6.1.3 A number of conclusions can be drawn from the report, namely:

- The site is accessible by non-car travel modes of such as walking, cycling and public transport, giving staff a choice about how they travel.
- The proposed new car park will be accessed via the northernmost access off John O'Gaunts Way and will provide sufficient car parking to cater for demand.
- The proposed new drop-off and pick-up facility, which include stacking lanes for waiting vehicles will operate efficiently and ensure all vehicles are contained within the site at all times.
- The pupil drop-off/pick-up calculations can be considered to be particularly robust, as they take no account of multi-occupancy trips, which will reduce the total number of vehicular trips to and from the site.
- The proposals will not give rise to any road safety or transport issues on the adjacent highway.
- A Travel Plan for the site will be implemented to encourage staff to travel to and from the school in a sustainable manner, where appropriate.

6.1.4 In their conclusion SCC advised that:

,

'The LHA continues to consider that the information submitted in support of this planning application does not fully assesses the highway and transport impacts of the proposed development. Further information is required as set out in this response. The LHA therefore recommends that this planning application should not be determined until the applicant has submitted further details which satisfactorily address the above issues'.

6.1.5 It is considered that this updated TS has provided clarity on the proposals and now reasonably assume that there are no material reasons why the proposed development should not be granted planning consent on highways or transportation grounds.



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