DERBYSHIRE County Council

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

Planning Manager
Amber Valley Borough Council
PO Box 15, Town Hall, Market Place
RIPLEY
Derbyshire
DE5 3XE

Highway Officer: Jenny Rhodes
Our ref: AVBC/2026/015939/R2
Your ref: AVA/2025/0862
Date: 27 October 2026

Dear Mrs Godson,

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

PROPOSAL: Full refurbishment and internal reconfiguration of existing building to form new 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.

LOCATION: Whitemoor Centre, John O' Gaunts Way, Belper DE56 0DB

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

The highway authority's initial observations on this planning application were issued on 16/3/26, with further observations issued on 2/10/26.

The applicant has submitted an amended Transport Statement (TS; updated 7/10/26), Traffic Management Plan (TMP; undated), and Site Plan (Ref 1209594 EDD ZZ ZZ DR A (90) 001 P1). These have been assessed, with observations presented below. Paragraph numbers relate to those within the TS, unless otherwise stated.

Proposed Development

This planning application proposes the refurbishment of, and alterations to, the Whitemoor Centre to enable it, along with the existing adjacent Holbrook School, to be used as one educational facility. The combined Holbrook School and Whitemoor Centre will have 86 staff and 158 pupils.

Trip Generation

The Holbrook School has provided details of the existing trips made to and from the site and the modes of transport used. Para 2.4.8 states that “at present, 50 no. pupils arrive/depart by taxi/minibus, whilst the other 8 no. pupils are dropped off and picked up by parents’ vehicles.” Para 2.4.10 continues that “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.” If a similar ratio is applied to the proposed 158 pupils at the site it would result in approximately 22 pupils being dropped off and picked up by parents’ vehicles and 136 pupils being dropped off and picked up by taxi/minibus, of which the actual number of minibus/taxi trips would be between 95 and 109 vehicles.

Table 2.2 shows that, of the 36 staff, 33 arrive by single occupancy car, 1 on foot, and 2 by cycle. If a similar ratio is applied to the proposed 86 staff at the site it would result in approximately 81 staff members arriving by car, 2 walking, and 3 cycling.

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.”

The highway authority 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.

Site Access

There are three existing vehicular accesses to the site from John O’Gaunt’s Way. It is proposed to retain all three accesses. No alterations are proposed within the highway limits of the accesses. However, the use of the accesses will change due to the internal access arrangements.

Para 3.2.34 confirms 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.’

Para 3.2.37 confirms that staff using the northern car park could use the northern access to leave the site as these vehicle movements would be outside of the pupil pick up and drop off times.

In view of the above, all pupil vehicles will enter the site via the northern access and exit via the southern access. Staff vehicles will enter through the northern access and exit either via the northern or southern accesses depending on where within the site they have parked. Delivery vehicles will enter through the middle access and exit via the southern access.

Staff vehicles will arrive and be able to proceed directly to the proposed staff car parks. Staff vehicles will mainly arrive on site prior to any pupil vehicles. As such, it is considered that the arrival of staff vehicles will not result in queues extending onto John O'Gaunt's Way.

As outlined above, 117 to 131 pupil vehicles are likely to arrive at the site within a 30-minute window twice a day (at drop-off and pick-up times). Section 3 of the TMP states that 'entry can be temporarily regulated at the northern access to ensure no queue extends onto John O'Gaunts Way.' Section 4 of the TMP continues 'Traffic Marshals will supervise morning (08:45–09:15) and afternoon (14:45–15:15) peak periods, with site entry supervised to navigate flow of incoming vehicles.' The applicant should explain how this will work in practice.

Staff Car Parking

A new car park is proposed in the northern part of the site, providing 42 car parking 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 Figure 2.5 in the TS shows that it includes 21 spaces.

Therefore, the total proposed number of car parking spaces at the site is 68. However, it is likely that some 81 staff would arrive by car. It is therefore likely that there will be a shortfall of 13 spaces in the number of staff car parking spaces at the site.

Clarification is required as to the where these additional 13 vehicles will park.

Drop-Off Routine

Paras 3.2.9 to 3.2.11 outline the drop-off routine: '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, where they will wait until the drop off zones at the southern end of the stacking lanes are available. 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'. Vehicles will then follow the road round and exit the site via the southernmost access onto John O'Gaunts Way.'

The TS clarifies that the one-way system will be controlled by appropriate carriageway markings and signage. Para 3.2.23 confirms 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.'

In para 3.2.15 it states that, based on existing practices, the duration of alighting and boarding vehicles is 2 minutes for a pupil by minibus/taxi and 1 minute for a pupil in a parent's vehicle. Section 4 of the TMP states that "Typical stop durations are: parent vehicle 1 minute; standard taxi 2 minutes; minibus 2 minutes." The TMP also states "with two operational drop-off bays, the facility can accommodate approximately 60 parent/taxi movements per hour under typical operation or 30 minibus vehicle movements per hour where all vehicles require assisted unloading."

Analysis of how the stacking lanes and drop off zone would work in principle with the number of pupils being dropped off is presented in Section 5 of the TS. The analysis assumes all pupils being dropped off in single occupancy vehicles (i.e. 158 vehicles) as a worst-case scenario although, as outlined above, some taxis/minibuses would be shared occupancy.

As set out in the highway authority's 2/10/26 observations, the highway authority questions the analysis in the TS as it includes use of the 10 vehicle spaces in the stacking lanes to be used for drop-off activity within the total available drop off time. However, it is the highway authority's understanding that the stacking lanes are only to be used for vehicles to wait and that pupils may only exit vehicles in the drop-off bays.

As determined in the Trip Generation section above, drop-off and pick-up activities take place within a 30-minute window. Pupils can only be dropped off in the drop zone, where there is space for two vehicles, resulting in 2 x 30-minute time slots for dropping off and picking up. However, there may be peaks within the 30-minute periods e.g. closer to 9.15am in the morning and 2.45pm in the afternoon.

The number of vehicles dropping off pupils is approximately 22 parent vehicles and 95 to 109 taxis/minibuses. It is not clear from the submitted details how long each vehicle would need to wait in the drop-off zone but, using the timings of 1 minute per parent car and 2 minutes per taxi/minibus, 212 to 240 minutes would be required for all vehicles to pass through the drop-off zone. This is significantly greater than the 60 minutes proposed and, being based on an average arrival rate during the drop off and pick up periods, does not account for such movements to peak within the peak 30-minute periods.

The highway authority considers that the dropping-off of pupils will take longer than the proposed drop-off time frame allows. As such, the highway authority considers that the proposed drop-off routine is not a feasible way for the pupils to arrive at the site. Further information is required to properly determine the implications of the drop-off and pick-up activity.

Cycle Storage

10 no. steel Sheffield-style cycle stands are proposed between the stacking lanes and Whitemoor Centre building and 3 no. steel Sheffield-style cycle stands for visitors near the main entrance to the Whitemoor Centre building are shown on the revised site plan.

A provision of storage for 13 cycles meets the requirements of LTN 1/20. Whilst the design of a Sheffield cycle stand allows for secure cycle parking, cycle equipment storage should also be provided. Details can be secured by planning condition.

Fencing

On-site fencing/gates are proposed to safeguard students, in the form of 2m high weld mesh fencing.

As previously observed by the highway authority, fencing is 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.

Sustainable Travel

Section 4 of the TS assesses the accessibility of non-car modes of transport to the site. The TS states in para 1.3.4 that "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."

The TS concludes that the site is accessible from the local footway network and, although there are no national cycle routes in the locality, the site is within 5 miles (40 min cycle ride) of Belper, Heanor, Little Eaton, Duffield, and Ripley.

There are numerous bus stops within 800m of the site, including one 50m from the site. Belper train station is a 34-minute walk from the site (10-minute bus ride or 10-minute cycle).

The highway authority therefore considers that the site offers some scope for use of alternative modes of transport to the car.

The highway authority previously commented that consideration should be given to bus stop upgrades and the provision and/or improvement of pedestrian crossing facilities on the surrounding highway network. TS paras 4.6.10 to 11 state that the "potential to upgrade the 2 no. nearest bus stops to the site will be discussed with the LHA and LPA as part of the planning process. Similarly, the requirement for pedestrian crossing facilities will be discussed."

The highway authority will seek to secure provision of improvement schemes by planning condition. Para 4.6.11 states that 'It can be confirmed that the Applicant is willing to accept a suitably worded planning condition in that regard'.

Traffic Management Plan (TMP)

Section 6 of the TMP states that 'deliveries and refuse collection should, wherever practicable, occur outside school arrival and departure periods and follow the approved internal circulation route.'

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

Travel Plan Framework (TPF)

TS Appendix 3 includes the TPF. Specialist colleagues have been consulted on the TPF, and their observations will be reported when available.

Conclusion

The highway authority 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 highway authority therefore 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.

Yours sincerely,

Jenny Rhodes
Transport Development Management

Date Received	Case Officer	Reviewer	Date Issued
16 October 2026	**Jenny Rhodes**	**SD**	**27 October 2026**