Harras Moor, Whitehaven

National Highways Position Statement – July 2023

LPA Ref: 4/18/2287/0O1 PINS Ref: APP/Z0923/W/23/3316104

Introduction

 This Position Statement has been prepared in respect of an appeal made by Homes England against the Local Planning Authority's (then Copeland Borough Council) decision to refuse to grant outline planning permission for a residential development at Harras Moor, Whitehaven (Ref: 4/18/2287/001). It has been prepared further to discussions with the Appellant's consultants.

The Planning Application

- 2. The planning application was submitted to the Local Planning Authority (then Copeland Borough Council) by Homes England in May 2018 and validated on the 26th June 2018.
- 3. The application was made in outline with all matters, except for external access, reserved for subsequent approval.
- 4. In preparing the information for the planning application, Homes England's consultant, WYG (latterly Tetra Tech) liaised with National Highways (previously Highways England).
- 5. Discussions commenced in September 2017 and were followed by the issuing of a Transport Technical Note and a Transport Assessment (TA) scoping email in January 2018.
- 6. National Highways commented on the scoping documents, providing advice on the scope of the TA in the process. National Highways' scoping requirements set out in a letter prepared by its consultant, Atkins, on 13th February 2018 were agreed.
- 7. The TA was prepared in accordance with the agreed scope and was submitted in June 2018.
- 8. National Highways provided feedback on the TA post-submission in August 2018. A Transport Assessment Addendum was prepared by WYG and submitted in November 2018. This updated the original TA with the Local Highway Authority's and National Highways' comments including peak hour assessments, modelling profiles, accident study area and future opening year forecast.
- 9. Further comments were received from National Highways in March 2019. This requested additional modelling in relation to the A595 Egremont Road/Homewood Road roundabout. In response, a further note (Technical Note 2) dated April 2019, was submitted by WYG.

- 10. Discussions continued until, in the Summer of 2019, an agreement with National Highways was reached on all relevant transport matters including trip generation, trip assignment, access, the impact of the development on the network and the location of highway and transport improvements considered necessary to mitigate the effects of the Application scheme. At that time, National Highways judged the effect of the development on its transport network to be acceptable, and it advised that there was no impediment from its perspective to the grant of planning permission subject to the imposition of conditions to deliver the proposed improvements. That position remains.
- 11. During the course of discussions, Homes England worked with National Highways specifically to progress designs for the off-site highway works at the A595 Egremont Road/Homewood Road roundabout that National Highways deemed was necessary mitigation.
- 12. Technical Note 3 Improvements to Offsite Roundabouts was prepared by Tetra Tech (formerly WYG) in March 2021, which included a scheme at the A595 Egremont Road/Homewood Road roundabout.
- 13. A final re-consultation was undertaken in 2022 in light of the additional material that had been supplied. In May 2022, National Highways again concluded that the proposals would not result in a severe traffic impact upon the operation of the strategic road network nor any safety concerns and responded formally to the planning application saying that it had no objections to the proposed development, subject to the delivery of a scheme to mitigate the effects of the development on the A595 Egremont Road/Homewood Road roundabout.

Accessibility

- 14. The appeal site is in a sustainable and well connected location.
- 15. The site benefits from easy access to a wide range of services and community facilities within the town including shops, schools, churches, sports facilities and public transport.
- 16. The local residential streets are suitable for cycling.
- 17. National Route 72 of the National Cycle Network (NCN) runs south/north into Whitehaven town centre. It is largely traffic free and is located around 1km to the west of the site's western boundary.
- 18. The nearest rail station to the site is Corkickle Rail Station which is located approximately 1.6km from the site.
- 19. The site can be adequately connected to the neighbouring communities and to Whitehaven town centre by existing and proposed active travel and shared travel systems.

Access Proposals

- 20. In respect of access to and from the site the application proposal is made up of:
 - New all modes access taken off Harras Road;
 - All modes access from Caldbeck Road using parts of the existing road alignment; and
 - New active travel links which includes to the A595 Loop Road South.
- 21. The access arrangements are presented in **Appendix 1**. National Highways takes no issue with the location and nature of these accesses.

A595 Egremont Road/Homewood Road Roundabout

- 22. An improvement to a junction on the strategic road network was included within the Application scheme. This was requested by National Highways. The junction is the A595 Egremont Road/ Homewood Road Roundabout and is the responsibility of National Highways.
- 23. **Appendix 2** presents the proposed junction improvement submitted as part of the planning application.
- 24. Changes at this junction have been included within the emerging Local Plan. Since the planning application was submitted, National Highways has progressed its own proposed junction improvement at this location as part of its wider network management duties. It advises that this junction improvement would be appropriate to satisfy the mitigation of this junction reported in the emerging Local Plan. It is presented in **Appendix 3**.
- 25. National Highways advises that this mitigation scheme is capable of being delivered within the adopted highway (subject to detailed design work being completed to understand this in more detail, which the developer will need to progress with us and provide funding for in line with our internal Third-Party Scheme Design Review process).
- 26. The principles of the two junction improvement options are consistent in that they each seek to provide two lanes on the southern arm of the roundabout, but they have been devised for different purposes.
- 27. The National Highways scheme as shown in **Appendix 3** need not be solely delivered by the proposed development. Instead, subject to agreement with the Local Planning Authority, National Highways would be content with a proportionate contribution pooled with other proposed developments identified within the Copeland Local Plan Transport Improvement Study and Infrastructure Delivery Plan, which are both supporting documents to the emerging Local Plan. A suitably worded obligation to this effect could be included within the Section 106.

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- 28. National Highways would accept a contribution towards the scheme as long as the scheme is delivered before the agreed trigger point (and this would all need to be agreed with the LPA Cumberland Council). However, our preference would be that the scheme is funded and delivered solely by the developer of this application given the inclusion now of the crossing scheme, which relies on the hospital roundabout improvement being implemented before the crossing in order to prevent negative impacts on the A595 traffic flows.
- 29. National Highways' position is that the delivery of the scheme presented in **Appendix 3**, or a similar scheme (any changes to the scheme will need to be checked by NH colleagues), is necessary prior to more than 200 dwellings being occupied on the development site. It agrees that the entirety of the improvement in **Appendix 3** can be delivered by the development by means of a Section 278 agreement of the Highways Act 1980 should the development choose to do so.

A595 Controlled Crossing

- 30. The Appellant has proposed further improvements to the highway network for the purpose of providing betterment in terms of pedestrian permeability and public realm.
- 31. The A595 is a partial barrier to movement to some people. A betterment of this situation would be a signal-controlled crossing which allows pedestrians to cross the road in a controlled environment. A scheme for such a crossing was presented to National Highways in April 2023. It is presented in **Appendix 4**.
- 32. This scheme was subjected to a Safety Audit in April 2023 following discussions with National Highways. National Highways was present at, and took part in, the Road Safety Audit site visit.
- 33. There are no substantive issues arising from the Audit and the scheme is deliverable within the publicly adopted highway and meets relevant design standards.
- 34. The scheme has benefits for the wider local community, which includes, but is not limited to, the development.
- 35. The controlled crossing is supported by National Highways. It should be noted in this statement that if this scheme was a standalone scheme, it would not be supported by National Highways due to the negative impacts on the A595 traffic flows. However, the crossing scheme being delivered as a combined scheme with the hospital roundabout improvements would have an overall benefit that is supported by National Highways. This is due to the benefits at the hospital roundabout outweighing the disbenefits at the stand alone crossing.
- 36. The development is acceptable without the inclusion of this crossing. However, the crossing is related to the development and provides betterment for both the development and wider local community. Its inclusion is consistent with guidance issued by National Highways, notably the DfT Circular 01/2022.

Traffic Effect

Relevance of the Application Submission Traffic Assessment

- 37. In November 2022 the Applicant voluntarily undertook additional traffic counts on the same parts of the strategic highway network that were assessed for the Application in 2018.
- 38. The accuracy of traffic measurements can generally be considered to be in the order of +/- 10%. Traffic movements vary day to day. It is reasonable to expect there to be a +/- 10% variation in traffic flows day by day.
- 39. A comparison assessment has been undertaken that shows a good level of consistency between the traffic flows forecast in 2023 (as used in the application) and the traffic flows measured by updated traffic counts at the end of 2022 (November). This is shown in **Appendix 5**.
- 40. This assessment reinforces the judgement that it is reasonable to rely upon the traffic impact work, conclusions and agreements originally submitted with the Application.

Road Safety

- 41. Up to date collision statistics have been compared with the statistics presented with the Application. The reported statistics are from the industry standard Crashmap database and in both circumstances provide a five year window on the data (see **Appendix 6**). This is appropriate data.
- 42. There is no substantial difference between the two sets of data. The safety characteristics of the network are broadly similar now to those which were described with the Application and so the road safety work, and judgements made therein, originally submitted with the Application remains relevant.

Conclusion

- 43. National Highways conclude that it is still appropriate to rely on the assessment information presented and agreed during the planning application when forming a judgement regarding the effect of the development proposals.
- 44. National Highways' position remains that it has no objection to the proposed development and is content that an appropriate mitigation scheme at the A595 Egremont Road/Homewood Road roundabout can be delivered within the adopted highway, subject to further detailed design work being undertaken to confirm this.
- 45. Its updated position is that the A595 Egremont Road/Homewood Road junction improvement developed by its own consultant, and included here in **Appendix 3**, is an appropriate junction improvement, and up to 200 homes can be occupied on the site prior to delivery of this, or a similar, junction improvement.
- 46. The signal-controlled crossing on the A595 benefits the wider community, including the development itself, and the road safety audit has not identified any substantive issues. The scheme is deliverable within the adopted highway, is supported by National Highways and can be conditioned.



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Traffic Survey Comparison

In November 2022, as part of the preparation for the appeal, additional traffic counts on the same parts of the highway network that were assessed for the Application in 2018 were undertaken.



Figure 1: Junction Assessment Locations

The accuracy of traffic measurements can generally be considered to be in the order of +/- 10%. Traffic movements vary day to day. It is reasonable to expect there to be a +/- 10% variation in traffic flows day by day.

A comparison of the forecast traffic flows in 2023, with the measured traffic flows at the end of 2022 (November) is in **Figure 2** and **Figure 3**.



Figure 2: 2023 Forecast v 2022 Observed ± 10% AM Peak



Figure 3: 2023 Forecast v 2022 Observed ± 10% PM Peak

There is good consistency between the forecasts used in the Application and the 2022 traffic counts.

Therefore, it is reasonable to rely upon the traffic impact work, conclusions and agreements originally submitted with the Application.

1 Collision Analysis

- 1.1 This Appendix deals with the collision data review of the surrounding area of the proposed development.
- 1.2 The collision data review was undertaken to examine any substantial changes in highway safety characteristics since the submission of the Application. The review uses the data extracted from Crashmap's database for 2013-2017 and latest available five years period (2017- 2021).

Records (2013 – 2017)

- 1.3 **Figure 1** illustrates the location of collisions recorded during 2013–2017 time frame. This was presented within the Application.
- 1.4 There are a total of 88 incidents registered in the surrounding area out of which 82 are marked as slight and 6 as serious injury.



Figure 1: Collision Data (2013- 2017 Period – from Application)

Records (2017 - 2021)

1.5 **Figure 2** illustrates the location of collisions reported in the same study area during 2017-2021. The data shows a total of 56 accidents reported, out of which 49 are registered as slight and 7 are serious injury.



Figure 2: Collision Data (Latest 5 Year Period)

Comparison between 2013 – 2017 and 2017 – 2021

1.6 A summary of the collisions recorded over the decade (2013 – 2021) categorised based on their severity is provided in **Table 1**.

Year	Slight	Serious	Total							
2013	15	1	16							
2014	17	1	18							
2015	17	0	17							
2016	18	2	20							
2017	15	2	17							
2018	12	3	15							
2019	6	0	6							
2020	9	1	10							
2021	7	1	8							

Table 1: Collision Data Summary

- 1.7 The table highlights the decrease in the number of accidents recorded during the latest five year period compared to 2013 2017 time span. A decreasing trend has followed since 2016 to 2019.
- 1.8 The results show that there is no reason to suppose a worsening in the safety characteristics of the highway network.
- 1.9 A detailed comparison analysis of the entire study area has been provided in **Table 2**.

Table 2: Detail Collison Statistics from 2013 – 2021

Junction	2013-2017			2017-2021		
	Slight	Serious	Total	Slight	Serious	Total
A595/ B5295 Ribton Moorside	1	0	1	0	0	0
A595/ Highlands	1	0	1	2	0	2
A595/ B5295 Egremont Road/ Homewood Road	4	1	5	2	1	3

A595/ Rosehill	2	1	3	1	0	1
A595/ Victoria Road	4	0	4	0	0	0
A595/ A5094 Inkerman Terrace	6	1	7	7	2	9
Moresby Road/ Red Lonning Priority Junction	5	0	5	1	0	1
B5295 Cleator Moor Road/ Moresby Road/ Main Street Roundabout	5	0	5	3	0	3
Harras Road and Park View (Between A595 and Red Lonning)	2	1	3	0	1	1
Red Lonning (between Victoria Road and 25m northwest of Moresby Road)	6	0	6	3	1	4
Moresby Road (between 30m northeast of Red Lonning and Red Lonning/Moresby Road/ Moresby Parks Road Roundabout)	4	0	4	0	0	0
Moresby Parks Road	1	1	2	0	0	0
A595 (between A5094 Inkerman Terrace and Victoria Road and north of Victoria Road)	5	0	5	10	2	12
A595 (north of Victoria Road)	2	0	2	0	0	0
Victoria Road/Solway View/Hilton Terrace/Wellington Row	5	0	5	3	0	3
Oakbank Road	1	0	1	0	0	0
Main Street (between clear Moor/ Moresby Road Roundabout and Egremeont Road/ Ribton Morrside Mini- Roundabout)	9	0	9	3	0	3

90m radius of Ribton Moorside/ Main Street/ Egremont Road Mini-Roundabout	3	1	4	3	0	3
Cleator Moor Road (between Moresby Road/Main Street Roundabout and Overend Road)	5	0	5	4	0	4
Other (i.e. Roads not likely to be affected by development traffic)	9	0	9	7	0	7
Total	80	6	86	49	7	56