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Highway Statement

Outline planning application for the erection of one detached dwelling, with all matters reserved except access

Item	Detail
Site	Land off Bowthorn Road, Parkside, Cleator Moor, Cumberland, CA25 5JE
Grid reference	E 301875, N 515973 (approx. centre of site)
Proposal	Outline planning permission for one detached dwelling (Use Class C3), access to be determined
Highway authority	Cumberland Council
Access	Existing field access onto Bowthorn Road, retained without alteration
Visibility	Approximately 119 m west and 50 m east, retained
Applicant	Mr Ivor Towers 1 Thistle Close The Highlands Whitehaven Cumbria CA28 6SP
Agent	Red Raven Design Ltd, Cocktons Yard, Cockermouth, Cumbria
Document reference	RRD/260703/ HS-01
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1.0 Introduction and Scope

- 1.1** This Highway Statement has been prepared by Red Raven Design Ltd on behalf of Ivor Towers in support of an outline planning application for the erection of one detached dwelling on land off Bowthorn Road, Parkside, Cleator Moor.
- 1.2** The application is submitted with all matters reserved except access. Access is therefore for determination now, and this Statement is provided so that the highway authority and the local planning authority have before them the information necessary to reach a view on it.
- 1.3** The scale of development does not meet the thresholds at which a Transport Assessment or a Transport Statement would ordinarily be required. Planning Practice Guidance indicates that Transport Assessments and Statements are required for development likely to generate significant amounts of movement; a single dwelling does not. This Statement is therefore proportionate to the scale of the proposal, and addresses:
- the existing access and its geometry;
 - available visibility and its assessment against recognised standards;
 - trip generation, and the comparison with the existing agricultural use of the access;
 - the recorded personal injury collision history;
 - parking, turning and servicing;
 - accessibility by non-car modes;
 - construction traffic;
 - conclusions against the relevant policy tests.
- 1.4** It should be read alongside the accompanying Design and Access Statement (ref. RRD/260703/DAS-01) and the submitted drawings, in particular the Site Layout Plan 260703-2.

2.0 The Site and the Existing Highway Network

2.1 Site location

- 2.1.1** The site comprises approximately 0.3 hectares of grazing land on the south side of Bowthorn Road (B5924), within the defined settlement boundary of Cleator Moor. The site is centred on approximate national grid reference E 301875, N 515973.

2.2 Bowthorn Road (B5924)

- 2.2.1** Bowthorn Road is an adopted public highway maintainable at public expense, classified as B and subject to a 40 mph speed limit at the point of access.
- 2.2.2** In the vicinity of the access the road is approximately 7m in carriageway width, of two-way single-carriageway construction, with no footway, no street lighting, and gently curving horizontal alignment. Forward visibility along the road is 78m east to west, and 135m west to east.
- 2.2.3** The road carries predominantly local traffic and does not form part of the strategic or primary road network. National Highways has no interest in the proposal.

2.3 The existing access

2.3.1 The site is served by an existing vehicular access onto Bowthorn Road. The access is presently in use and serves:

- the grazing land forming the application site;
- agricultural sheds on the wider holding;
- machinery and implement storage.

2.3.2 The access is accordingly used by agricultural vehicles including tractors, tractor-and-trailer combinations, livestock transport and periodic deliveries – vehicles which are large, slow to accelerate, slow to clear the carriageway on entry and egress, and in some cases exceeding 3.0 m in width.

2.3.3 The access has a bellmouth width of approximately 4.5m, a gate is set back approximately 2.5m from the carriageway edge and opens inwards. This proposal sees this gate moved back so that it sits more than 6m from the boundary edge.

2.3.4 No alteration to the position, width, alignment, construction or gradient of the access is proposed.

3.0 Policy and Standards Context

3.1 National policy

3.1.1 Paragraph 116 of the National Planning Policy Framework (December 2024, as amended February 2025) provides that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

3.1.2 This is a deliberately high bar. It is not enough that a proposal produces some additional traffic, or that an access falls short of a standard that would be applied to a new access on a greenfield site. The question is whether the impact on safety is unacceptable, or whether the residual cumulative network impact is severe.

3.1.3 Paragraph 114 requires that appropriate opportunities to promote sustainable transport modes be taken up, that safe and suitable access to the site can be achieved for all users, and that any significant impacts from the development on the transport network or on highway safety can be cost-effectively mitigated to an acceptable degree. Paragraph 117 gives priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport.

3.2 Development plan policy

3.2.1 Criterion (f) of Policy DS4 of the Copeland Local Plan 2021–2039 requires that development should not give rise to severe impacts on highway safety and/or a severe impact on the capacity of the highway network, and should allow for the safe access and manoeuvring of refuse and recycling vehicles. Where such an impact would arise, mitigation will be sought.

3.2.2 Strategic Policy CO4 (Sustainable Travel) and Policy CO5 (Transport Hierarchy) seek to enable sustainable, active and low-impact travel and to give priority to walking, cycling and public transport. Policy CO7 (Parking Standards) governs off-street parking and electric vehicle provision.

3.3 Technical standards

3.3.1 Manual for Streets (DfT, 2007) and Manual for Streets 2 (CIHT, 2010) are the appropriate design references for a residential access in a built-up, lower-speed environment. Manual for Streets gives the following

stopping sight distances, derived from a 2.0 second driver reaction time and a deceleration rate of 4.41 m/s²:

Speed	SSD (Manual for Streets)	Comment
20 mph	25 m	Typical of home zones and traffic-calmed streets
25 mph	33 m	
30 mph	43 m	The applicable figure where a 30 mph limit is in force
Above 30 mph	Refer to DMRB CD 109	Manual for Streets is not intended for higher-speed roads

3.3.2 Manual for Streets makes clear that visibility splays should be measured from a driver eye position set back 2.4 m from the edge of the carriageway in most residential situations, and that a set-back of 2.0 m may be acceptable in a low-speed environment where a 2.4 m set-back is not achievable.

3.3.3 Manual for Streets also cautions against the mechanical application of the largest possible visibility splay. Excessive visibility can encourage higher approach speeds and so be counter-productive to safety. The Court of Appeal and appeal decisions have consistently recognised that an established access with an acceptable safety record is a material consideration of weight.

4.0 Visibility Assessment

4.1 Visibility from the existing access has been measured on site. The available splays are as follows, and are to be retained in their present form:

Direction	Available (y)	MfS SSD at 30 mph	Assessment
West (left on egress)	119 m	43 m	Available visibility exceeds the required standard by a factor of approximately 2.8
East (right on egress)	50 m	43 m	Available visibility exceeds the required standard

4.2 The x-distance, or driver eye set-back, is 2.4m from the edge of the carriageway. The splays are measured to a target height range of 0.26 m to 2.0 m in accordance with Manual for Streets.

4.3 On the basis of a 30 mph speed limit, both splays exceed the Manual for Streets stopping sight distance of 43m. The westbound splay does so very substantially. A driver emerging from the access has clear sight of approaching traffic in both directions well in excess of the distance in which an approaching vehicle travelling at the speed limit could be brought to a halt.

4.4 The land within both splays is in the applicant's control or within the highway verge and is presently unobstructed. The frontage hedgerow will be maintained within the splays, and no structure, planting, wall, fence or stored material exceeding 900mm height will be permitted within them. A condition requiring the splays to be provided and thereafter kept free of obstruction in perpetuity would be accepted.

4.5 If a higher speed limit applies

4.5.1 The assessment above assumes a 30 mph limit at the access, consistent with the site's position within the settlement boundary. Should the highway authority advise that a higher limit applies, or that recorded 85th percentile speeds materially exceed 30 mph, the following points are relevant:

- the access is existing and is retained without alteration, so the proposal does not create a new conflict point on the network;
- the lawful fallback position is the continued unrestricted agricultural use of the access by large, slow-moving vehicles, which represents a materially greater highway risk than the movements of a single dwelling;
- there is no recorded personal injury collision history at or near the access over the preceding ten years, which is the most direct available evidence of how the access performs in practice;
- a speed survey could readily be undertaken to establish 85th percentile approach speeds, and the applicant would be willing to commission one if the highway authority considers it necessary.

4.5.2 In those circumstances the correct question remains the paragraph 116 question: not whether the access meets a counsel-of-perfection standard for a new access, but whether the addition of one dwelling to an existing access produces an unacceptable impact on highway safety. For the reasons set out at Section 6, it does not.

5.0 Trip Generation

5.1 Proposed trip generation

5.1.1 A single detached dwelling in a settlement of this character would typically generate in the order of five to eight two-way vehicle movements per day, with approximately 0.5 to 0.8 two-way movements in each of the weekday morning and evening peak hours. These figures are consistent with TRICS data for privately owned houses in suburban and edge-of-town locations, and with National Travel Survey averages.

5.1.2 Expressed against the traffic flow on Bowthorn Road, this equates to substantially less than one additional vehicle every hour across the working day, and to well under one additional movement in the peak hour. Such a change is not capable of measurement against normal daily variation in traffic flow, still less of being characterised as severe.

5.2 The existing use and the fallback position

5.2.1 The comparison is not between the proposed dwelling and a wholly unused access. The access is already in use, and lawfully so, serving grazing land, agricultural sheds and machinery storage.

5.2.2 The existing agricultural use generates movements which are fewer in number but individually of a substantially higher risk profile than those of a dwelling:

- tractors and tractor-and-trailer combinations, which are wide, long and slow to accelerate away from the access;
- vehicles which occupy the carriageway for a longer period when entering and emerging, and which may require an oncoming vehicle to slow or stop;
- seasonal peaks of activity, including silage and slurry operations and livestock movements;
- deliveries by rigid and articulated goods vehicles.

5.2.3 By contrast, the movements associated with a single dwelling are by private car and light goods vehicle: short, quick to clear the carriageway, and dispersed across the day. The addition of a dwelling does not

materially add to the use of the access in traffic terms, and improves the character of that use in safety terms.

- 5.2.4** Where the agricultural use of the access continues alongside the dwelling, the combined use remains modest and well within the capacity of a single residential-standard access.

6.0 Personal Injury Collision Record

- 6.1** A review of recorded personal injury collision data has been undertaken for the highway network in the vicinity of the access, covering the most recent ten-year period for which validated data is available.
- 6.2** No personal injury collisions are recorded at or in the immediate vicinity of the access during that period. Source: crashmap.co.uk; search radius: 200m.
- 6.3** A clear ten-year record is significant evidence. It demonstrates that the access, in its existing form and with its existing visibility, has operated without giving rise to recorded harm across a substantial period, including throughout its use by agricultural vehicles. It provides direct empirical support for the conclusion that the geometry of the access is adequate to the conditions on this length of Bowthorn Road, and it is more probative than a theoretical shortfall against a design standard would be.

7.0 Access Design, Parking, Turning and Servicing

7.1 Access design

- 7.1.1** The existing access is retained. The following details are proposed to confirm its suitability for residential use, and are capable of being secured by condition:
- the first 6m of the access, measured from the edge of the carriageway, to be surfaced in a bound or otherwise non-migratory material, so that loose material is not carried onto the highway;
 - the access gradient over that length not to exceed 1 in 20, and thereafter not to exceed 1 in 10;
 - surface water from the access to be intercepted and disposed of within the site, with no discharge onto the highway – by an interceptor drain or channel across the access at the highway boundary;
 - any gate to be set back a minimum of 6m from the edge of the carriageway and to open inwards only, so that no vehicle stands on the carriageway while it is opened;
 - visibility splays of 2.4m by 119 m to the west and 2.4m by 50 m to the east to be retained and thereafter kept clear of obstruction above 900 mm in height.

7.2 Parking

- 7.2.1** Layout is a reserved matter. The indicative scheme provides three off-street parking spaces of a minimum size of 2.5 m by 5.0 m within the curtilage, in accordance with Policy CO7 and the highway authority's adopted parking standards.
- 7.2.2** An electric vehicle charge point will be provided in accordance with Part S of the Building Regulations, and secure covered cycle storage for a minimum of two cycles will be provided within the curtilage, consistent with Policies CO5 and CO7.

7.3 Turning

- 7.3.1** Sufficient space will be provided within the curtilage to enable a vehicle to turn and re-enter the highway in forward gear. This is a matter of some importance on a road of this character, and the indicative layout demonstrates that a turning area meeting the standard car swept path can be accommodated without

compromising the amenity space or parking provision. A condition requiring the turning area to be provided before first occupation and thereafter retained would be accepted.

7.4 Refuse collection and servicing

- 7.4.1** Criterion (f) of Policy DS4 requires development to allow for the safe access and manoeuvring of refuse and recycling vehicles. No refuse vehicle will be required to enter the site. Bin storage will be provided within the curtilage, with a designated presentation point at the site frontage within [25] m of the storage position and adjacent to the existing access, so that collection is made from the adopted highway in the manner already established along Bowthorn Road.
- 7.4.2** The carry distance for the occupier from the storage position to the presentation point will not exceed 25 m, and the route will be level or gently graded and firm-surfaced.

8.0 Accessibility by Non-Car Modes

- 8.1** The site lies within the defined settlement boundary of Cleator Moor, which Strategic Policy DS1 identifies as a Key Service Centre – a settlement described in the Local Plan as self-sufficient, providing a wide range of services including convenience and comparison stores, employment opportunities, schools and healthcare, and acting as a service hub for nearby villages.
- 8.2** Approximate walking distances from the site are set out below.

Facility	Approx. distance	Comment
Nearest bus stop	Within 1km	Services to Whitehaven
Convenience store	Within 1km	
Primary school	Within 1km	
Secondary school	Within 1km	
GP surgery / health centre	Within 1.5km	
Town centre	Within 1.5km	

- 8.3** Pedestrian access from the site to the settlement is available via Bowthorn Road, which is to the town centre. The site is therefore within a comfortable walking distance of day-to-day services, consistent with the Chartered Institution of Highways and Transportation guidance that 2 km represents a reasonable walking distance for commuting and 800m for local facilities.
- 8.4** The proposal therefore accords with Strategic Policy CO4 and with paragraph 114 of the Framework in providing a genuine choice of transport mode for future occupiers. It is not a location in which future occupiers would be wholly dependent on the private car.

9.0 Construction Traffic

- 9.1** Construction of a single dwelling generates a small and short-lived volume of traffic, typically peaking during groundworks and the delivery of the superstructure and frame.

- 9.2** All construction vehicles will enter and leave the site in forward gear where practicable, and all contractor parking, materials storage and site welfare facilities will be located wholly within the site, so that no obstruction of Bowthorn Road arises. Wheel-cleaning facilities will be provided if ground conditions require them.
- 9.3** A construction method statement dealing with these matters, together with hours of construction, can be secured by condition should the highway authority consider it necessary. Given the scale of the development, a full Construction Environmental Management Plan of the kind required by Policy DS4 for major development would not be proportionate.

10.0 Summary and Conclusions

- 10.1** The material findings of this Statement are as follows.

	Finding
1	The dwelling will be served by an existing access onto Bowthorn Road, retained without alteration to its position, width, construction or gradient.
2	Visibility of approximately 119 m to the west and 50 m to the east is available and is to be retained. Both figures exceed the Manual for Streets stopping sight distance of 43 m for a 30 mph environment, the westbound splay very substantially so.
3	No personal injury collisions are recorded at or near the access over the preceding ten-year period.
4	A single dwelling generates approximately five to eight two-way movements per day and under one movement in the peak hour – a change incapable of measurement against normal daily variation.
5	The access is already in use by agricultural vehicles which are larger, slower and of a higher risk profile than the car movements of a dwelling. The proposal does not materially add to the use of the access and improves its character in safety terms.
6	Off-street parking, turning and cycle storage will be provided within the curtilage, so that all vehicles may enter and leave the highway in forward gear and no refuse vehicle need enter the site.
7	The site is within the settlement boundary and within walking distance of the services of Cleator Moor, with access to bus services, providing a genuine choice of transport mode.

- 10.2** Taking those findings together, the proposal gives rise to no unacceptable impact on highway safety, and the residual cumulative impact on the road network, following mitigation, would not be severe under any reasonable future scenario. The test in paragraph 116 of the National Planning Policy Framework is not approached, let alone met.
- 10.3** The proposal likewise accords with criterion (f) of Policy DS4 of the Copeland Local Plan 2021–2039, and with Strategic Policy CO4 and Policies CO5 and CO7.
- 10.4** Safe and suitable access to the site can be achieved for all users. There is no highway objection to the grant of outline planning permission with access determined.

10.5 Conditions offered

- 10.5.1** The applicant would accept the following conditions, which are considered to meet the six tests at paragraph 56 of the Framework:

- provision of the visibility splays as measured, and their retention thereafter free of obstruction above 900 mm in height;
- surfacing of the first 6m of the access in a bound material prior to first occupation, and its retention thereafter;
- provision of surface water interception at the access to prevent discharge onto the highway;
- provision of the parking and turning area prior to first occupation, and its retention thereafter;
- any gate to be set back a minimum of 6m from the carriageway edge and to open inwards only;
- a construction method statement, if the highway authority considers one necessary.

Prepared by Red Raven Design Ltd, Cocktons Yard, Cockermouth, Cumbria.

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