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Your Ref: 4/25/2349/0R1  
Our Ref: ATE/25/01555/RM  
Date: 11 November 2025

## Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: , Cumberland Council

**Application Ref:** 4/25/2349/0R1

**Site Address:** LAND AT HARRAS MOOR, HARRAS ROAD, WHITEHAVEN,  
CA28 6SQ

**Description of development:** APPLICATION FOR APPROVAL OF RESERVED MATTERS RELATING TO APPEARANCE, LAYOUT, LANDSCAPING AND SCALE FOR THE ERECTION OF 300 DWELLINGS WITH ASSOCIATED OPEN SPACE & INFRASTRUCTURE PURSUANT TO OUTLINE PLANNING APPROVAL 4/18/2287/001 (THE OUTLINE WAS NOT AN EIA APPLICATION)

Notice is hereby given that Active Travel England's formal recommendation is as follows:

- a. **No Objection:** ~~ATE has undertaken a detailed assessment of this application and is content with the submission.~~
- b. **Conditional approval:** ~~ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.~~
- c. **Deferral:** ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.
- d. **Refusal:** ~~ATE recommends that the application be refused for the reasons set out in this response.~~

### 1.0 Background

Active Travel England (ATE) welcomes the opportunity to comment on the Reserved Matters application for the residential development at Harras Moor, Whitehaven. Outline planning permission (Ref 4/18/2287/001) was granted on appeal in August 2023 (APP/Z0923/W/23/3316104). The appeal decision established the principle of development and key access arrangements, including obligations to deliver a new pedestrian crossing of the A595 and improvements to Homewood Roundabout in consultation with National Highways.

The site occupies an elevated position on the south-eastern edge of Whitehaven, bounded by Harras Road, Red Lonning and High Grove Estate. It forms part of the Council's planned southern expansion and is identified within the Whitehaven LCWIP (2022) as a priority area for improved walking and cycling connections.

While ATE cannot revisit matters of access principle or off-site highway works already secured at outline stage, this response assesses the reserved design details — specifically the quality and integration of the proposed active travel routes, pedestrian connections, cycle infrastructure and placemaking measures — against the Active Travel England Planning Application Assessment Toolkit (2023) and LTN 1/20: Cycle Infrastructure Design (DfT, 2020).

## **2.0 Summary**

ATE has reviewed the following documents submitted with the Reserved Matters application:

- Design & Access Statement (DAS, 2024)
- Site Layout Plans and Landscape Drawings (2024)
- Active Travel Link Drawings – Red Lonning and High Grove (2024)
- Framework Travel Plan (MTP, 2023, submitted at outline stage)

The reserved matters proposals include several positive design features for active travel:

- A 3.0 m shared footway/cycleway along Red Lonning, providing a segregated route connecting to existing paths and future LCWIP corridors.
- A 2.0 m pedestrian footway with crossing points on Harras Road, addressing an existing network gap.
- Multiple permeable pedestrian and cycle connections to adjoining streets and open spaces.

These elements represent an improvement in network connectivity and are consistent with the outline approval and LCWIP priorities.

However, ATE notes that detailed design information — such as CLOS/JAT audits, crossing layouts, surface treatments and cycle-parking design details — remains limited. These are essential for demonstrating that the scheme's detailed design meets LTN 1/20 standards.

Accordingly, ATE supports the reserved matters proposals in principle, subject to provision of the outstanding technical details at the detailed design / pre-construction stage.

### **2.1 Trip Generation and Travel Plan**

The Framework Travel Plan submitted at outline stage sets a sound behavioural framework and commits to appointing a Travel Plan Coordinator (TPC). However, it remains at a framework level and does not yet contain updated mode-share targets, funding mechanisms, or monitoring protocols appropriate for implementation.

At Reserved Matters, ATE recognises that new survey data is not required, but securing the detailed Full Travel Plan remains essential prior to occupation.

**ATE Rating:** 🟡 Amber – Further Information Required

**Reason:** The behavioural framework is established, but delivery details and monitoring commitments are still outstanding.

**ATE Recommendation:** ATE requests that a Full Occupier Travel Plan is submitted and secured by condition or S106 prior to occupation, including:

- Mode-share targets aligned with LCWIP and ATE Toolkit Criterion 2.
- Funded TPC role for at least 5 years post-occupation.
- Annual resident travel surveys and adaptive measures if targets are missed.
- Linkages to local travel infrastructure information (e.g. LCWIP and bus timetables).

## 2.2 Active Travel Routes and Off-site Infrastructure

The DAS and Active Travel Link Drawings show a 3.0 m shared-use footway/cycleway along Red Lonning, with dropped kerbs and bollards to calm traffic, and a new footway and crossing on Harras Road. These measures address previously identified network gaps and provide a more coherent, direct connection between the new development and the existing built-up area.

While these improvements are welcome, the RM submission remains light on technical detail. There is no evidence of CLOS or JAT auditing, no gradient profiles, and limited reference to surfacing, lighting, or separation from traffic. Without this information, ATE cannot confirm that the proposed routes will deliver the safety and comfort required by LTN 1/20 principles.

Because off-site works are controlled through outline planning conditions and the National Highways S278 process, ATE's focus is on ensuring design quality and connectivity within the site boundary and the continuity of those links to the LCWIP network.

**ATE Rating:** 🟡 Amber – Further Technical Detail Required

**Reason:** Strategic intent is sound, but design evidence is incomplete.

**ATE Recommendation:**

- Submit detailed construction drawings of all pedestrian and cycle routes, showing compliance with LTN 1/20 widths, gradients, and surface specifications.
- Provide CLOS/JAT audits to confirm safety, comfort, and directness of internal and Red Lonning links.

## 2.3 Site Permeability and Placemaking

The layout provides several access points for pedestrians and cyclists and some landscaped corridors. However, the placemaking approach remains largely conceptual and does not clearly demonstrate how the street hierarchy or public realm will prioritise walking and cycling over vehicle movement.

Key pedestrian links, including those connecting to open spaces and Red Lonning, appear narrow or undefined in places, and there is limited information on gradients, lighting, or surfacing. The site's topography presents further challenges for accessibility that have not been fully addressed.

Overall, while permeability is indicated in plan form, the experience and comfort of movement through the site for people walking, wheeling, and cycling are not yet evident.

**ATE Rating:** 🟡 Amber – Further Information Required

**Reason:** Permeability is apparent but not yet supported by sufficient detail on placemaking, inclusive design, or user comfort.

**ATE Recommendation:**

- Provide an Inclusive Design Audit in accordance with Inclusive Mobility (2022).
- Submit a lighting and wayfinding plan for main pedestrian and cycle routes.
- Clarify how public realm design, materials, and landscaping will reinforce pedestrian and cycle priority.
- Demonstrate gradients, seating, and rest points for accessibility on steeper sections of the site.

## 2.4 Cycle Parking and End-of-Trip Facilities

Cycle parking is indicated on the layout but without specification. No details are provided on the number, type, or accessibility of stands, or how security and weather protection will be achieved. The absence of these details means compliance with LTN 1/20 cannot be verified.

**ATE Rating:** 🟠 Red – Area of Concern

**Reason:** Cycle parking provision remains conceptual and lacks compliance evidence.

**ATE Recommendation:**

- Submit a Cycle Parking Design Pack confirming:
  - Number and type of stands for long-stay and visitor use.
  - Spacing, aisle widths, lighting, and CCTV coverage.
  - Provision for cargo/adapted cycles and accessible storage.
  - Step-free access routes from dwellings and public areas.
- Secure implementation by condition prior to first occupation.

## 3.0 Conclusion

Active Travel England acknowledges the progress made since outline consent, particularly the intention to deliver new walking and cycling links along Red Lonning and Harras Road, and to integrate these with wider LCWIP priorities. These interventions, if delivered to LTN 1/20 standards, would address long-standing barriers to active travel on the southern edge of Whitehaven.

However, the current Reserved Matters submission does not yet demonstrate that the proposed layouts and details will deliver safe, direct, and inclusive active travel infrastructure.

Key information is missing — including route cross-sections, CLOS and JAT audits, inclusive design drawings, and cycle parking layouts. The treatment of gradients, junctions, and public realm design also requires further evidence to ensure the development supports everyday walking and cycling.

While the principle of improvement is supported, ATE cannot confirm compliance with LTN 1/20 or the ATE Toolkit on the basis of the information submitted. These matters should be

resolved through detailed design submissions and conditions prior to commencement or occupation.

On this basis, ATE's position remains one of **conditional support in principle**, subject to significant further design and technical clarification before construction.