

Copeland area Planning Department, Cumberland Council

For the attention of Nick Hayhurst

Date: 18 December 2023

Your reference: 4/21/2432/0F1

Dear Nick Hayhurst

CONSULTATION ON PLANNING APPLICATION

Appn: 4/21/2432/0F1
Site Address: FORMER MARCHON CHEMICAL FACTORY, HIGH ROAD, WHITEHAVEN
Proposal: HYBRID APPLICATION SEEKING FULL PLANNING PERMISSION FOR THE ERECTION OF 139 RESIDENTIAL DWELLINGS (C3), NEW VEHICULAR ACCESSES OFF HIGH ROAD, PUBLIC OPEN SPACE AND ANCILLARY INFRASTRUCTURE AND OUTLINE PLANNING PERMISSION FOR RESIDENTIAL DEVELOPMENT UNITS, RETAIL (E(A,B,C,E,F), F2(A) AND ANCILLARY INFRASTRUCTURE WITH ALL MATTERS RESERVED OTHER THAN ACCESS

Thank you for your consultation on 30 November 2023 regarding the above Planning Application.

Cumberland Council as the Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) has reviewed the revised assessments and drawings relating to the site layout and surface water drainage design and our findings are detailed below.

Local Highway Authority response:

The following matters relate to the discussions regarding the on-site and adjacent active travel requirements and aspirations. The comments and observations below also include previous concerns and shortcoming which have been addressed, as confirmed in the previous response:

Visibility Splays

- The difference between 60m and 59m as shown is not material and can remain as it is on the drawings;

Visitor Parking

- The revised proposals show sufficient visitor spaces and are now satisfactory;

Turning Heads on Private Drives

- I note that several of the private driveways are very long which means that the distance to the bin collection point is more than the recommended 30m.
- The redesign of the long driveway adjacent to Plot 126 is noted and the swept path shows the manoeuvre can be accommodated. Please note that the applicant has to be satisfied that the refuse operator is prepared and has agreed to access this private shared driveway and also that the driveway will have to be constructed to a suitable standard of construction for the extra vehicle loading but it will remain private.
- It is not clear which roads will be adopted and which will remain private. Please provide a S38 Adoption intentions plan.
- There are several cul-de-sacs which will require access for refuse vehicles which appear to be private driveways (all marked as 'may need to make road shared surface'). These must be built to adoptable standards and have the appropriate clearance strips and service strips. Please refer to Appendix 4 of the CDDG.
- All roads except private shared driveways must be built to adoptable standards and have the appropriate clearance strips and service strips. Please refer to Appendix 4 of the CDDG.

Link to Phase 2 and Traffic Calming

- The proposed extension of the access road into Phase 2 is welcomed. This link also provides the necessary second access and / or EVA once the development is connected. It also provides the necessary cycle and footway link to Phase 2 and onwards to High Road.
- The indicative design of the traffic calming is accepted as an appropriate measure to manage speeds in this instance. I note that the humps have been replaced with tables as suggested. The construction details of the raised tables including materials and colour need careful consideration and will need to be approved by the Adoptions Officer and Traffic Officer. Our recommendation will be that further details of the highway layout and associated infrastructure will be required for approval by the LHA via a pre-commencement condition.

Active Travel Routes Through the site

- I note that the requested 3m wide shared cycleway on the eastern fringe of the site linking to a spur to the northern boundary leading to High Road and an extension of this along the main E-W road to the western end of the site.
- I note from the landscape drawing that the requested leisure paths have been indicatively shown as requested. These link to the CP and also provide useful circular leisure routes.

Phase 2 Outline - LHA Comments

- There is no objection in principle to the proposed two access locations to the highway. The accesses will need to comply with the CDDG in terms of width, footway provision and visibility splays. the splays should be 2.4m x 60m in each direction.

- The two accesses ensure that there are sufficient number of accesses for the development (i.e. 2 accesses for >100 dwellings);
- The internal layout of the streets in Phase 2 (and beyond) are only shown indicatively and the layout is to be considered as part of the reserved matters. The developer should adhere to the CDDG and principles of Manual for Streets in the design to create a sense of place with high quality and convenient sustainable transport routes. In particular the following should be noted:
 - cul-de-sacs are to be avoided. Loops roads are preferred;
 - the streets (especially the primary streets) should be designed using geometry and layout features to naturally control the speed, vertical measures should be avoided. The design speed of 20mph shall be the target;
 - Links to adjacent new and existing residential areas as well as footways and footpaths shall be provided;
 - Consideration should be given to providing a bus route through the larger site utilising the two access points onto High Road to create a circular route. The primary streets in that case should be 6.0m wide.

Transport Assessment & Travel Plan

Targets & Intervention Measures

- The proposal for setting targets in the revised TP is acceptable.
- Off-site measures are addressed in the comments above and do not need to appear in the TP;
- It is noted that the TP proposes cycle parking to be provided in each house curtilage. We suggest this is strengthened in the detailed submission of the proposals to provide a more robust offering of 'secure under-cover cycle parking with mains supply within each house curtilage where there is no garage' (i.e. a solid bike store or shed). This will allow for the convenient and secure storage of e-bikes (and possibly e-scooters) as well as regular bikes and will encourage sustainable transport for short journeys.

I can confirm that subject to these provisions the Travel Plan is acceptable.

Lead Local Flood Authority response:

FRA and Flood Risk

Having reviewed the FRA I am satisfied that the flood risk to the site from any source of flooding is 'low' or 'very low'. Also, bearing in mind the site location, there is no risk of run-off from the site causing a flood risk downstream due to high discharge rates and volumes. In fact there is no requirement to limit the discharge rate in this instance as the outfall is to sea, but in terms of pipe capacity, treatment and avoidance of cliff erosion potential, it is desirable in this instance.

Drainage Strategy

I am satisfied that infiltration is not appropriate in this instance due to the presence of contaminants on the site and therefore a positive drainage system discharging to the sea is appropriate.

The design should incorporate as many SUDS features as possible, especially 'green' SUDS such as rain gardens, swales and basins, even if these have to be lined, rather than underground storage solutions if storage is required. The drainage design should be holistic with the wider development layout and be an intrinsic part of the site and where possible offer amenity and bio-diversity benefits with improved habitats.

Exceedance routes from the Waters Edge Development phase 1 and 2 fall towards the proposed development site. We would welcome a detailed plan showing how the excess flood water would be dealt with. There is a storage system and flow control chamber in the northeast corner of the site which is designed as an exceedance point.

Permeable surfaces, primarily permeable block-paving, can have useful treatment benefits and should be considered alongside bio-retention areas as suggested in the strategy.

I note from the revised drainage strategy that the surface water outfall is now proposed to use an existing headwall to the north of the site. Due to the increased discharge over the cliff edge there is some concern that erosion could be increased. Please provide further evidence to show that this proposal will not present any erosion risk in the long-term.

Whilst the existing foul sewer has been highlighted and an easement shown on the Preliminary Drainage Layout, there is no reference to the UU public surface water sewer in the site which runs parallel to the Wagon Way and then runs east. Please show this on the drainage plan to demonstrate that it falls into the easement.

Conclusion:

The **LHA** require further clarification on:

- the site road layout, with specific attention to street hierarchy and designs to adoptable standards where necessary
- proposed adoption extents / clarifications

The **LLFA** require further information and clarifications as explained above before a full assessment and recommendation can be made. This includes:

- How the surface water drains and exceedance flows from Waters Edge (Phases 1 & 2) are accommodated / managed

- How the UU surface water drains in site (parallel to the foul) is accommodated. (clarification on drawing required)
- Assessment of risk of cliff erosion at outfall location from additional flow

Additional conditions securing details of the proposed design will be requested in due course.

The LHA has identified several off-site highway, active travel and public rights of way improvements and financial contributions to be delivered / funded by the developer. The details of these have not been finalised and therefore not included in this response.

Yours sincerely

Shamus Giles

Lead Development Management Officer