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Copeland area Planning Department, Cumberland Council

For the attention of Sarah Papaleo

Date: 27 June 2023

Your reference: 4/23/2088/0F1

Dear Sarah Papaleo

### **CONSULTATION ON PLANNING APPLICATION**

**Appn: 4/23/2088/0F1**  
**Site Address: LAND AT HARASS ROAD HARASS PARK, WHITEHAVEN**  
**Proposal: PROPOSED RESIDENTIAL DEVELOPMENT FOR 23 DWELLINGS**  
**INCLUDING ASSOCIATED INFRASTRUCTURE AND LANDSCAPING**  
**(RESUBMISSION OF 4/22/2135/0F1)**

Thank you for your consultation on 4 May 2023 regarding the above Planning Application. Cumberland Council as the Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) has reviewed the above planning reference and note that it is an exact resubmission of 4/22/2135/0F1

### **LHA Response**

Since the previous response, it has come to our attention that the proposed (and previously agreed) traffic calming measures of raised tables is considered not acceptable, or not a preferred solution from a highways operation perspective.

Instead, the Local Highway Authority now recommend that speed reducing traffic calming is provided by a give-way chicanes consisting of two build-outs. These should be similar to those found on Lowca High Street with the give-way for down-hill traffic and priority for uphill traffic. The build-outs shall be designed with a gap against the road edge to allow for surface water to bypass the build-outs. The applicant can contact the Highways department for further details of the layout.

Please note that forward visibility of 60m needs to be provided on the approach and exit of these features so the chicanes need to be located towards the upper and lower limits of the site and away from driveways to prevent blocking of driveways. The LHA will provide further details but locations and arrangement of the chicanes, footway and crossing points with links to the southern footway need to be presented but we envisage a chicane at each end of the site.

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Please also note that as stated in my original response, a footway on the site frontage is required to make this proposal acceptable in planning terms. The footway shall run along the whole site frontage and there should also be crossing points to link to the footway on the south side of the road. This footway need only be 2m wide however.

***Further highway details / layout of the footway, crossings and off-site traffic calming works needs to be submitted before I can make a full response.***

**Lead Local Flood Authority response:**

The principles of the FRA are accepted and it is noted that according to the mapping, there is low or very low risk of flooding to the site from any source. However, local knowledge which has been confirmed from a site visit suggests that surface water does flow across the surface and will represent a real flood risk to the site unless this is addressed and mitigation measures are included.

I note that it has been assumed that the whole site is positively drained utilising filter or cut-off drains, drains for retaining walls and one around the perimeter of the site as previously recommended by the LLFA. I am therefore satisfied with the general approach to draining the site. In the detailed design, the applicant should investigate the incorporation of kested hedges and/or swales to the site boundary as well as cut-off drains to help control off-site flows.

As for the strategy and compliance with the NPPF drainage destination hierarchy I am satisfied that infiltration is not suitable based on the soakaway testing, geology and local knowledge. therefore the proposal to discharge at an attenuated greenfield rate to the downstream watercourse is appropriate.

I am satisfied with the urban creep design factor of 10% to calculate storage but the climate change factor of 40% has been used and it should now be 50%. In the detailed submission this should be increased to 50%. I note the whole site has been used to calculate greenfield run-off rate to set the controlled discharge rate (total 11.8 l/s) and this is considered appropriate and robust in this instance. Since the land will be terraced and have filter drains and attenuation, the run-off rate to the downstream watercourse could even be less than the existing and therefore reduce the risk of downstream flooding.

I accept the need and use of geo-cellular crates in this instance although it is not the preference of the LLFA which prefer open or 'green' SUDS features such as swales, ponds or basins. Due to the space and gradient constraints, it is acknowledged that these features would not be practicable. However, it should be note that that the LHA will not adopt the roads if they have the tanks constructed beneath them due to maintenance risk and difficulty. The whole development will have to remain private unless a solution can be found where the the tanks are out-with the Highway extents.

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I note the inclusion of a hydrodynamic vortex separator which will adequately treat the surface run-off, albeit in a mechanical way rather than a basin or pond.

**Conclusion**

In summary, the LLFA has no objection to the proposals but will need further details and recommends that the following conditions are included in any consent granted:

**Prior to the commencement of any development, a detailed surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions, inclusive of a maintenance schedule of how the scheme shall be managed after completion and an exceedance route diagram shall be submitted to and approved in writing by the Local Planning Authority.**

**The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly.**

**The drainage scheme submitted for approval shall also be in accordance with the principles set out in the Flood Risk Assessment & Drainage Strategy dated February 2022 proposing surface water discharging to the watercourse.**

**The development shall be completed, maintained and managed in accordance with the approved details.**

*Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.*

**No development shall commence until a construction surface water management plan has been agreed in writing with the local planning authority.**

*Reason: To safeguard against flooding to surrounding sites and to safeguard against pollution of surrounding watercourses and drainage systems.*

Yours sincerely

**Shamus Giles**

Lead Officer - Flood & Development Management