

Copeland area Planning Department, Cumberland Council

For the attention of Christie M Burns

Date: 1 December 2023

Your reference: 4/23/2313/0F1

Dear Christie M Burns

CONSULTATION ON PLANNING APPLICATION

Appn: 4/23/2313/0F1
Site Address: LAND TO THE SOUTH OF DALEVIEW GARDENS, EGREMONT
**Proposal: FULL PLANNING APPLICATION FOR THE RESIDENTIAL
DEVELOPMENT OF 164 DWELLINGS (USE CLASS C3), VEHICLE
ACCESS FROM ULDALE VIEW, LANDSCAPING, SUDS, AND
ASSOCIATED INFRASTRUCTURE WORKS**

Thank you for your consultation on 16 November 2023 regarding the above Planning Application.

Cumberland Council as the Local Education Authority, Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) has reviewed the above planning reference and our findings are detailed below.

Local Education Authority response:

This is a full application for 164 houses on 7.78 hectares of land to the South of Daleview Gardens, Egremont.

The housing breakdown has been provided as: 13 x 2 bed, 90 x 3 bed, 61 x 4+ bed roomed houses. Using a dwelling-led model on the 164 units it is theoretically estimated to yield 96 children: 57 primary and 39 secondary pupils for the schools.

The primary catchment school for this development is Bookwell Primary School (0.3 mile measured from approximate centre of the site of the proposed houses) and West Lakes Academy is the catchment secondary for this development (0.7 mile). The next nearest primary school is St Bridget's Catholic Primary School (0.6 mile). The next nearest secondary school is Whitehaven Academy (5.2 miles) which is over the walking threshold.

Office of National Statistics pupil yield data for Cumbria has been used to calculate yield according to the number and type of housing in a development.

The methodology for calculating available spaces in schools first considers developments with planning approval, before assessing which schools the developments will impact and

what spaces remain for the most recently proposed development. Currently there are three developments affecting the primary schools used for this assessment and sixteen affecting the secondary schools. The table attached shows both the catchment schools and the developments that will affect them.

PRIMARY

There are insufficient places available in the catchment school Bookwell Primary to accommodate the pupil yield of 57 from this development. However, there are 3 other schools within the 2 mile threshold which have spaces.

An education contribution would not be required for Primary places.

SECONDARY

There are insufficient places available in the catchment school West Lakes Academy to accommodate the secondary pupil yield of 39 from this development. The next nearest school is Whitehaven Academy but is in excess of the distance threshold of 3 miles.

A contribution of **£1,065,480** (39 x £27,320) would be required for secondary education to provide additional accommodation capacity.

NB. Projections represent a snapshot in time and all figures can be subject to change as further information becomes available.

It should be noted that there may be other potential developments that may affect these schools, but as they have not been approved at this stage, have not been included in the calculations.

Local Highway Authority response:

Site Layout

The LHA has no objection in principle to this site since it is a local plan allocation and the LHA has already provided comments which can be found in the Site Access Assessment report. The matters which are satisfactorily addressed or do not present a material impact include:

- Trip levels from the development and junction capacity. the forecasted peak development flows do not represent a material or severe impact on the highway and the junction capacity onto Uldale View and elsewhere on the immediate network do not give undue concern to the LHA in terms of queues and delays from development traffic.
- There is sufficient in-curtilage parking shown on the site
- The permeability of the site for Active Travel users (pedestrians and and cyclists) is generally good and we support the inclusion of informal footpaths within the site
- The road layout and road hierarchy is generally acceptable, but there are several areas that need reviewing (see below)

- I note that the longer shared private driveways have bin collection areas shown, but these do not accommodate any turning facilities for non-residents and van deliveries etc.

Transport Assessment incorporating the Interim Travel Plan

Accidents / Safety Record & Accessibility

- It is noted and accepted that there are no recorded injury incidents in the immediate area over the past 5 years. There is no reason to conclude that the proposed development would lead to an unacceptable road safety risk as long as the necessary provisions to facilitate and manage vehicle, pedestrian and cycle access and movement to and from the development.
- Cycle access to local facilities and services is by existing highway which is deemed acceptable in this location and environment. Cycle journeys should be encouraged by the provision of secure storage for each dwelling. I note and welcome this principle being offered by the developer. However, LTN 1/20 guidance stipulates one cycle parking space per bedroom. With a garage this is theoretically possible but not all properties have garages. A lack of suitable storage will be a limiting factor for people adopting cycling as an active travel mode.
- Vehicle access onto Uldale View could be problematic. Uldale View at the proposed location is used for on-street parking making the road effectively a single-lane road. The LHA has reservations on the practicalities of this arrangement and would request that the location be reviewed with a view to moving it northwards or providing some localised widening so there is no conflict with parked cars.

Junction Capacity

- I note and agree that all trips should be assigned to the route north to the town along Bookwell / Queens Drive as Uldale View to the south is a cul-de-sac and only open to pedestrians and cyclists.
- The forecasted peak hour development flows of 79/87 for AM/PM are considered not significant when it comes to overall link and junction capacity. It is shown that the resultant capacity impact is negligible at the site access onto Uldale View and the Uldale View / Queens Drive junction.

Travel Plan

- The LHA welcome the Interim Travel Plan, its conclusions and recommendations.
- The publicity and promotion measures are welcomed as well as the on-line and travel brochures to be supplied.
- The proposals for a baseline survey (after 100 dwellings occupied), a 12 month follow on survey and then two more at 2-year intervals seems reasonable. I also note the production of the monitoring report which the LHA will review against targets. The LHA will be seeking a financial contribution of £6,600 for the monitoring service.

- It is important that sensible but ambitious targets are set for modal shift / split. I note the preliminary targets and welcome further discussions with the applicant on appropriate values to adopt in the plan in the first instance and the further opportunity to review these after the baseline survey.

Infrastructure and Active Travel Improvement and Highway Financial Contributions

- Whilst I note that a new footway will be provided from the new access joining to the existing footway on Greendykes, the footway to Bookwell Primary School is narrow compared to new standards. The Local Plan identifies localised footway improvements on Bookwell, to widen it to 2m to make it continuous and consistent with the new provision and that opposite the school. This will make this route safer and encourage modal shift. The improvement would be to strip widen the footway to 2m wide with concrete pin kerb at the rear for the section from Bookwell School to the junction with Uldale View (240m). The contribution required for this is £41,700.
- A sum of £6,600 is requested for the monitoring of the interim reports reviewing the effectiveness of the Travel Plan and including any necessary amendments or measures shall be prepared by the developer/occupier and submitted to the Local Planning Authority for approval.
- I note that a leisure walking route has been provided around much of the site, which we welcome as it provides amenity, habitat and bio-diversity benefits and opportunities. However, there are gaps in the path on the northern and southern site boundaries. Consideration should be given to linking these paths up to make a circular route.

LHA Conclusion

Overall, the site takes into account the Local Plan comments and is generally compliant but there are several areas of detail that need to be resolved at this stage as it will potentially alter the site layout and more discussion and evidence is therefore required.

1. The layout should be revised to a loop road for the main road around the site. This is easily achieved with minor modifications to the layout to make a continuous road between Plots 110 and 115. This will remove significant reversing manoeuvres and the inherent danger. This main circular road should have a 2m wide footway to the west or possibly both sides of the road.
2. There are insufficient visitor parking spaces in laybys. I note that there are some spaces allocated on street, but these are awkward to use and encourages footway parking. The full allocation of 33 should be in laybys.
3. Retaining the boundary hedge and providing a footway / footpath internally and remote from the carriageway means that the internal footway / footpath cannot be adopted. A s38 adoptions plan should be provided for clarity on the adoption intentions and also

some clarification on maintenance of green areas / trees etc outside gardens (note, the highway Authority will not adopt the trees in the roadside verge)

4. It does not appear that the necessary visibility splays from the footpath and EVA onto Uldale View can be achieved with the existing hedge in-situ. These should be 1.5 x 43m for both in each direction. The applicant is encouraged to review the arrangement and network of footways to maximise connectivity;
5. There are several long private shared driveways with no turning heads. How will rigid delivery vans service these houses at the end of the private driveways of the driveways are full of cars?
6. The main site access onto Uldale View comes out where vehicles are typically parked on the west side of the road. This will create an awkward manoeuvre (i.e. a single lane road effectively for emerging traffic). Consideration should be given to moving this access further north and / or providing some localised widening to accommodate 2-way traffic + a row of parked cars on Uldale View.
7. The junction of Uldale View onto Queens Drive is on a straight-through alignment with no deflection rather than a normal tangential arrangement. This current layout allows high speed entry into Uldale View which will present a hazard to drivers using the new access. The LHA considers that this junction should be redesigned to a more conventional layout, 'squaring' the junction up to slow traffic entering and exiting Uldale View. This scheme should be delivered by way of a S278 agreement.
8. The aggregate path into the site adjacent to Plot 15 would be the main pedestrian route for much of the development due to its location providing a better desire line. A bound surface would be more suitable for this section which will be heavily used.
9. The path along the western boundary (inside the site) is not continuous, forcing active-travel users onto the carriageway. The proposed footway/ aggregate footpath should run to the whole length of the site frontage. This will also be important in terms of connectivity should the site to the south be developed in future.
10. There should be a continuous walking aggregate path on the southern boundary linking Plot 57 with 44 and the paths along the eastern boundary.
11. The crescent between Plots 127 and 137 should have a continuous road (shared surface road is suggested) to provide a sensible and desirable route for pedestrians and cyclists which would also avoid unnecessary turning and reversing manoeuvres.
12. Clarity on the cycle parking provision to allow for 1 space per bedroom for all dwellings.
13. The footway from the site to Bookwell school has been identified as being narrow and below the recommended minimum in the CDDG. It is important that developers provide high quality linking infrastructure from their sites to encourage walking to

nearby schools and modal shift. The LHA consider that widening the footway (currently 1.2 / 1.5m wide) to 2.0m wide is required and is especially relevant on the eastern side of the road as this is where all residents will take to the school and beyond.

I welcome further discussion with the applicant to reach a satisfactory solution to these matters.

Lead Local Flood Authority response:

Flood Risk

I note the FRA and am satisfied that the location of the site (in FZ1) means that it is not at risk from any source of flooding. The site is however covered by a Source Protection Zone 3 designation and certain precautions and requirements must be considered in connection with the surface water drainage strategy.

Drainage Strategy

Analysing the topography survey contours it appears that the existing site predominantly falls (and thus drains to) the north and east. I note that the basins are located in these areas to the edge of the site. However, I note that although the total site area is 7.78 Ha, the area used to calculate QBar / discharge rate (i.e. positively drained area of the site) is just 4.35 Ha. Without an accompanying plan it is difficult to assess this.

I also note that the Greenfield Qbar run-off calculations have manually amended the default value of SOIL type from 4 to 3. Please provide an explanation / evidence for this. This change reduces the discharge rate significantly.

I note the findings of the infiltration testing and that it seems possible to provide infiltration basin type drainage in the SE corner of the site. However, due to the increased risk from failure or poor performance or exceedance from this kind of feature, we would require careful examination and an analysis of the exceedance route and possible impact downstream.

The remainder of the site is proposed to utilise traditional positive drainage with attenuation basins and flow control. The designs should be in accordance with the NSTS and CIRIA SUDS manual. We would encourage the use of 'open' or surface water SUDS features as far as practicable, including conveyancing swales instead of pipes.

I note that the attenuation features have been designed with a Climate Change factor of 40% applied. This should be 50% so the calculations and designs will need to be revised accordingly.

Surface Water Infiltration Systems:

Informative/advice to applicants:

Where soakaways or other infiltration systems are proposed for the disposal of surface water, our general requirements are as follows:

- 1) Soakaways or other infiltration systems shall only be used in areas on site where they will not present a risk to groundwater, with the depth of soakaway kept to a minimum to ensure that the maximum possible depth of unsaturated material remains between the base of the soakaway and the top of the water table, ensuring that a direct discharge of surface water into groundwater is prevented.
- 2) Soakaways shall not be constructed in land affected by contamination, where they may promote the mobilisation of contaminants and give rise to contamination of groundwater.
- 3) Only clean water from roofs shall be directly discharged to soakaways.
- 4) Subject to the approval of the Local Authority, further percolation tests may be required to ensure that soakaways will work adequately in adverse conditions. If, after tests, it is found that soakaways do not work satisfactorily, alternative proposals should be submitted.

LLFA Conclusion

In summary, the LLFA are satisfied in principle with the hybrid approach. However, without further information (as listed in the CDDG Appendix 7) I am unable to carry out a high level review to ascertain whether the QBar / discharge rate is appropriate, where the infiltration areas are, where the exceedance routes are etc. Please provide the following information / evidence:

- site investigation (including soil type assessment) / percolation tests
- preliminary drainage design drawing / strategy showing discharge destination
- contributing, permeable and impermeable areas
- Revised drainage calculations (including details of climate change allowance, urban creep, storage volumes, Greenfield QBar reasoning etc)
- Plan of exceedance routes
- Further details of water quality treatment

Yours sincerely

Shamus Giles

Lead Officer - Flood & Development Management