

Copeland area Planning Department, Cumberland Council

For the attention of Christie M Burns

Date: 6 March 2024

Your reference: 4/24/2044/0F1

Dear Christie M Burns

CONSULTATION ON PLANNING APPLICATION

Appn: 4/24/2044/0F1
Site Address: LAND AT EAST ROAD, EAST ROAD, EGREMONT
Proposal: DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF A DISCOUNT FOOD STORE, ALTERATIONS TO VEHICULAR AND PEDESTRIAN ACCESS, PROVISION OF CAR AND CYCLE PARKING, SERVICING AREA, HARD AND SOFT LANDSCAPING AND ASSOCIATED WORKS

Thank you for your consultation on 14 February 2024 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 our findings are detailed below.

Access:

Vehicle

- The proposed store access is suitable but needs to have a dropped kerb crossing with tactile paving across the mouth of the junction (this detail can be conditioned).
- The shared nature of the access (i.e. deliveries and customer car park) is not ideal as it presents additional risk of conflict. However I note the constraints of the site and the fact that deliveries 'will be managed' to minimise conflict. The LHA recommend that HGV deliveries use a 'banksman' for deliveries during trading hours and that this is part of a 'Delivery Management Plan' which in turn can be incorporated into the Travel Plan which is a live document and can be revised as and when necessary (can be conditioned)
- I note the evidence of the 85th %ile speeds dictate that a visibility splay of 30m and 43m (to the north and south respectively) are required for the Wyndham Place / East View junction and 43m at the site access junction and these can be provided. However, I am aware that on-street parking to the north, outside the terrace, can affect visibility. I note some changes at this junction with footway realignment /

provision which also accommodates the two informal off-street parking spaces. It is recommended that the visibility splay and lengthened section of road / footway is protected from parking by creating a build-out on East Road to deter / prevent parking in the splay. There will also need to be a dropped kerb access to this private area. It will be necessary to demark the footway (i.e. adopted highway) extent with pin kerbs to the rear of the footway. It would also be beneficial if this new section of footway was 2.5m wide and consider planters or seats in the build-out area (to remain private) to manage the parking and prevent illegal access to the parking across the raised kerbs. The details of the changes to the highway and junction can be resolved through the S278 process.

- East Road is a key walking desire line to the town centre and secondary schools. The footway on East Road, along the site frontage, should be minimum unobstructed width of 2.5m. Note - additional space would need to be allowed for the barriers on the roundabout. The footway on Wyndham Place should be a minimum width of 2m between store access egress and East Road.
- Wyndham Place. The applicant needs to clarify the footway arrangement on Wyndham Place as it does not appear to align with the footway outside Rivendale on the plans. Information on the footway widths and existing / proposed kerb lines and carriageway widths should be provided; the carriageway width appears to have been reduced.

Cycle and Pedestrian link to the Town Centre

I note that there is a link to the underpass ('ped access' on the plans). This is welcomed but should be 3m wide not 2m wide to better accommodate cycles, pushchairs and wheelchairs etc. Also, since the footway is next to parking bays, the overhang from cars will effectively reduce the usable footway width. This path must be step-free and a maximum gradient of 1:10. Instead of coming off the top or the ramp at footway level, the applicant should consider the potential of routing a path from the underpass at a lower level, straight into the car park near to the cycle stands. This would be a more direct route and almost at the same level so would be easier and quicker to use. I note that the applicant is having discussions with National Highways and I look forward to some progress.

In the meantime, the fall-back provision of a stepped access is not acceptable to the LHA. This should be a ramp as described above (3m wide) and as such revised details will need to be submitted for approval.

Parking/Turning:

Car Parking

The parking provision of 86 spaces is not in accordance with the Cumbria Design guide which states that there should be 1 space per 15m² of GFA. If the GFA (rather than the net sales area is taken as 1,855m², then there should be 126 spaces.

I note the argument provided in the TA that based on a recent survey, 86 spaces will be sufficient. However, I note that all three Carlisle Aldi stores (all stand-alone rather than on a retail park) have closer to 100 car parking spaces each. Please can you provide details of the car parking accumulation analysis so I can check the relevance of the store selected to the Egremont location and size.

The 5 No. blue badge holder spaces is adequate

Provision for Cyclists

I note and welcome the 4 Sheffield type stands. However, it would be beneficial if the offering could be increased to 5 stands as a minimum improvement. However, it is recommended that the applicant make provision for increasing numbers of cyclists, and differing types of cycle in accordance with LTN 1/20.

Whilst the applicant has met the minimum criteria for short stay provision, the presence of only Sheffield stand type provision suggests they have not considered long stay parking or other recommendations in the guidance on cycle parking given in Chapter 11 of LTN 1/20.

The applicant should consider:

- Additional short stay parking and provision of long stay parking in the form of cycle lockers / hanger, with provision for public and staff parking.
- Adaptive cycle spaces. Whilst 1 adaptive space would meet the ATE provision of 5%, the applicant should consider a minimum of 2 spaces. Including provision for cargo / non standard cycles should also be considered.
- As the site is located on NCN 72 the applicant could consider the provision of an 'off the peg' outdoor cycle maintenance station for staff and public use.
- Providing changing and showering facility for staff.

Highway Capacity:

The LHA has no objection to the access onto East Road which is an adopted, but unclassified road. Due to the low flow on East Road it is not envisaged that there will be a capacity issue at this particular junction.

The main issue with traffic impact will be on the A595 roundabout. Due to the very heavy tidal peak flows on the A595, the links and roundabout are at or near capacity at certain times of day. I note that the Transport Assessment has modelled the roundabout for an uplifted 2024 scenario and it shows if working with minimal queuing. Taking into account the existing use of the site and other traffic that uses East Road, the LHA do not consider that the forecasted trips will have a material impact on the local network. The impact will be more acute on the Trunk Road network and the applicant should liaise with National Highways and seek their views.

Travel Plan

The LHA welcome the interim Travel Plan.

LHA Conclusion

The LHA has some reservations and the following areas need further investigation and/or evidence at this stage as follows:

- details of the car parking accumulation analysis
- Revision of the pedestrian / wheeler access to the store from the A595 underpass
- Details / confirmation of the footways to the frontage of the store (west and north)
- Wyndham Place / East View build-out and new junction arrangement
- Draft S278 adoption plan

Other matters (details) will be secured by pre-commencement conditions.

Lead Local Flood Authority Advice and Comments

Drainage Strategy/Design:

I note that the strategy concludes that the discharge will be to a public surface water sewer. It is accepted that drainage destinations further up the NPPF hierarchy (i.e. infiltration and to a waterbody or watercourse) is not viable / available.

I also note that UU have agreed in principle to the discharge rate of 5.8 l/s (I have verified that this is the greenfield equivalent using the HR Wallingford tool). This is acceptable to the LLFA and also accept that the underground attenuation tanks are appropriate / necessary on this kind of urban / brownfield constrained site. I have carried out a storage volume check using the HR Wallingford tool which shows that for 50% CC and 10% UC approximately 580m³ of storage is needed. The proposed underground tank provides 366m³. Please explain the apparent discrepancy in the storage estimates.

It appears from the underground utility survey that the existing site drains by gravity to the SW sewer to the east whereas the proposed solution relies on a pumping regime with rising main. The LLFA do not encourage the use of surface water pumping stations due to the risk of failure / lack of maintenance and the ensuing flood risk. I appreciate that with a deeper system required due to the underground storage and constraints of the receiving network, the gravity solution will be challenging. However, the LLFA need to see evidence / reasons why a gravity solution cannot work. The UU SW sewer deepens to the south of the access and it may be worth looking at possible connection further downstream. It is also worth considering the whole life cost of the infrastructure. The maintenance and replacement costs of pumps may outweigh any additional capital costs in installing a more challenging gravity solution.

The proposed treatment measures and exceedance route is satisfactory. However, the maintenance schedule does not include any reference to the pump. It is critical that there is a maintenance / testing regime in place for the surface water pump.

LLFA Conclusion

The LLFA has some reservations and the following areas need further investigation and/or evidence at this stage as follows:

- Comments on possibility of a gravity solution or evidence that rules it out
- Comments on surface water attenuation / storage provision
- Pump maintenance proposals included in the Drainage Management and Maintenance Document.

Yours sincerely

Shamus Giles

Lead Officer - Flood & Development Management