Flood & Development Management
Parkhouse Building
Carlisle
CA6 4SJ

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Copeland area Planning Department, Cumberland Council

For the attention of Christopher Harrison

Date: 22 June 2026
Your reference: 4/25/2349/0R1

Dear Christopher Harrison

CONSULTATION ON PLANNING APPLICATION

Appn:	**4/25/2349/0R1**
Site Address:	**LAND AT HARASS MOOR, WHITEHAVEN**
Proposal:	**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 4/18/2287/0O1 (THE OUTLINE WAS NOT AN EIA APPLICATION)**

Thank you for your consultation on the above Planning Application.

Further to my response of 31/10/25 I have reviewed the additonal and revised documents relating to Highways and the Flood Risk Assessment and Surface Water Strategy.

I can can confirm as follows :

Local Highway Authority response:

Referring to my previous responses *(in Italics)* I can make the following comments:

Layout

Shared surface streets are shown with just two clearance strips, not with a 2m wide service strip to one side as required.

1. *There are too many cul-de-sacs where simple short connections could make a loop road layout. A loop road layout can support more dwellings (up to 30) on s shared-surface-street. As show, several of the cul-de-sacs have too many dwellings for a shared surface street.*

The revised layout addresses this in part and is now an acceptable compromise. Whilst there are still several cul-de-sacs, there are better Active Travel links between the various residential areas.

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2. *The link spine road through to the Highlands (Road 4) on Drawing 'Engineering Layout - Sheet 2 of 8' does not include footways. This will become a key link and it is critical that 2m wide footways are included on both sides of the road. However, I do note that on other drawings including 'Adopted Highway Layout' and 'Proposed Layout' this link road is shown with footways both sides. Please clarify.*

This detail has been revised and is now acceptable - showing 2m footways on both sides of the road.

3. *Road 4 is shown with bollards as a modal filter. These are suitable as they will not prevent all forms of cycles and wheelers. It is suggested that the cul-de-sac on Road 4 be extended to nearer the field boundary so the carriageway in front of Plot 19 is part of the cul-de-sac for maintenance purposes and more critically, the parking for Plot 18 is accessible.*

This detail has been revised and is now acceptable - showing a road link.

4. *The shared surface street serving Plots 125-146 serves too many dwellings. The maximum according to the CDDG for a cul-de-sac is 20, this serves 28. This road could be made into a looped shard surface street or a secondary road with footways to accommodate the 28 dwellings.*

This detail has been revised. However, the footway on the cul-de-sac serving Plots 18-34 is shown as a secondary street and has a footway on the northern side where it would be more logical on the southern side. Alternatively this section from the raised junction could be shared-surface street status with no footways but clearance and service strips.

5. *The two isolated speed tables are not considered necessary in the positions show nor consistent with the majority of the site (the one for the raised crossing is appropriate though). Instead of the raised tables it is suggested that raised junctions are used instead. [location 1 on plan]*

This detail has been revised and is now acceptable - showing a raised junction.

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6. *For speed management and consistency it is considered necessary to include a raised junction on Caldbeck Road with Jubilee Road. This will need to be carried out as part of the S278 for this area. [location 2 on plan]*

This detail has been revised and is now acceptable.

7. *On the main spine road with the offset-footway, there are some junctions where dropped crossings are not possible due to the design of the footway and verge on the radii. Please review these areas.*

Some of these locations have been resolved. The remainder can be picked up in the S238 Adoption Technical Layout and Detail Review.

Servicing Proposals

8. *The longer private driveways (>30m) will need bin collection points (BCP) within 15m of the adopted highway. Some of these driveways are shown with the bcp further from the highway than this.*

I note a combination of bin collection points and turning heads have been shown. These address this concern.

Surface Water Drainage on Paths

9. *The long winding path to Loop Road could act as a conduit for surface water which could flow out onto the highway. Measures should be included to mitigate this risk.*

SW drainage details still need to be confirmed.

Adoption Proposals

10. *The offset footway design with an avenue of trees is welcomed from an amenity point of view, but the verge and trees are elements the LHA would not be adoptable. These areas should remain private.*

These areas are shown as non-adopted as requested.

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Parking

11. No parking allocation plan has been supplied. Please provide a plan showing the following provision:

- *2+3 bed houses = 2 driveway spaces*
- *3+ bed house = 3 driveway spaces*

Visitor spaces at 1 per 5 dwellings, in laybys, evenly distributed around the development. I note that the areas / zones to the south of the woodland strip (plots 159+) do have sufficient visitor spaces placed evenly through the smaller zones

Provision still to be confirmed.

Road Lighting

12. There are no further lighting details provided. Previous observations and comments still apply.

13. Active Travel (refer to previous response for details of the various items)

a) This has been provided / resolved in the revised layout as requested.

b) This has been provided / resolved in the revised layout as requested.

c) This has been provided / resolved in the revised layout as requested.

d) Link between Plots 126 and 141 - not provided. We request the applicant revisit this item.

e) This has been provided / resolved in the revised layout as requested.

f) This has been provided / resolved in the revised layout as requested.

g) Link between Plots 161 and 175 - not provided. We request the applicant revisit this item.

h) This has been provided / resolved in the revised layout as requested.

i) This has been provided / resolved in the revised layout as requested.

j) This has been provided / resolved in the revised layout as requested.

k) This has been provided / resolved in the revised layout as requested.

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l) The active travel link (3m wide footway) has not been extended. However, I note that a widened path would be outside the red-line boundary and this could be provided in Phase 2.

m) This has been provided / resolved in the revised layout as requested. and High Grove.

n) I note that the three active travel links have detailed layout drawings which are to an acceptable design and are welcomed. However, the other drawings do not reflect the same layout.

o) The path remains at 3m but is shown at an acceptable gradient of 1:12. This is satisfactory. It also has the necessary resting places at regular intervals.

p) The link to Laurel Bank is not possible due to land ownership / constraints.

q) This has been provided / resolved in the revised layout as requested.

q) Cycle parking has been provided in green-space areas as requested.

r) Cycle parking may be a challenge in house types without a garage. The applicant is requested to provide information on how secure cycle parking will be provided.

LHA Conclusion

There are still outstanding concerns and layout details that need further consideration before I can make a recommendation. These are Items 4, 9, 11, 12 and 13 (d, g and r) listed above.

Lead Local Flood Authority response:

Flood Risk

The submitted Flood Risk Assessment considers flood risk from all identified sources including fluvial flooding, surface water flooding, groundwater, sewer flooding and land drainage. The site lies wholly within Flood Zone 1 and is therefore considered to be at low risk of flooding from rivers and the sea. The assessment concludes that flood risk from fluvial, groundwater, sewer and land drainage sources is low and, subject to the implementation of the proposed mitigation measures and drainage strategy, the residual risk to the development is considered acceptable.

The LLFA is satisfied that the flood risk assessment has appropriately considered the relevant flood mechanisms affecting the site and agrees with the overall risk classifications and conclusions reached in respect of fluvial, groundwater, sewer and land drainage flooding. The LLFA also agrees that the introduction of a positive drainage

system and attenuation-based SuDS network has the potential to provide a betterment over the existing unmanaged runoff regime.

Notwithstanding this, the LLFA retains a residual concern regarding the surface water flood risk identified in the eastern area of the site. The Environment Agency surface water mapping and the applicant's own assessment identify an indicative overland flow route extending southwards from the vicinity of the industrial estate and towards the existing residential properties around Winchester Drive. The FRA identifies this area as a notable surface water flow path and acknowledges the presence of localised ponding and higher-risk surface water flood zones in this part of the site.

Whilst the proposed drainage strategy includes attenuation basins and regrading works across the development, it is not currently clear how the proposed finished ground levels, earthworks, basin embankments and associated drainage infrastructure will interact with this existing overland flow route in this area. The submitted information does not clearly demonstrate whether these features will maintain, intercept, divert or potentially concentrate existing surface water flow pathways.

Given the known sensitivity of this part of the site and the proximity of existing residential properties in this area, the LLFA considers that further assessment should be undertaken to demonstrate how the development will affect the surface water flow route flood risk area.

Surface Water Drainage Strategy
The LLFA is satisfied that the submitted strategy follows the drainage hierarchy. Infiltration has been appropriately considered as the preferred option and, based on the available ground investigation information and site constraints, the LLFA is satisfied with the conclusion that infiltration drainage is not a viable means of surface water disposal for this site.

The proposed restriction of runoff to the calculated greenfield runoff rate (QBar) of 110 l/s is accepted in principle. The LLFA is also satisfied that the drainage design has incorporated the currently required allowances of 10% urban creep and 50% climate change and that attenuation storage has been sized accordingly.

Given the significant topographical variation across the site and the differing drainage pathways, the LLFA agrees that it is both sensible and necessary to divide the site into three drainage catchments, with runoff managed through a series of attenuation features and controlled discharge arrangements.

Notwithstanding the above, the LLFA has the following outstanding concerns which must be addressed before the drainage strategy can be considered acceptable:

The LLFA is also satisfied, in principle, that the proposed SuDS treatment train comprising swales and attenuation basins is appropriate for a development of this nature.

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The proposed swales will provide conveyance, interception of runoff and initial water quality treatment prior to discharge into the attenuation basins, which will provide further settlement and treatment benefits before discharge to the receiving watercourse.

However, for the sake of clarity, the effectiveness of the treatmnent train should be demonstrated with an assessment in accordance with CIRIA C753. The applicant should demonstrate that the proposed drainage system achieves the required treatment indices for the associated pollution hazards generated by the development.

The LLFA also notes that no SuDS operation and maintenance schedule has been submitted. Long-term maintenance is a fundamental requirement for the successful operation of any SuDS scheme and the submitted information does not identify:

- The responsible body for future ownership and management of the drainage assets;
- The organisation or management company responsible for inspection and maintenance activities;
- Maintenance frequencies and procedures for swales, attenuation basins, flow controls, pipework, outfalls and associated SuDS components;
- Arrangements for sediment removal, vegetation management and asset replacement.

A comprehensive operation and maintenance schedule should therefore be provided. This schedule should identify the responsible owner and/or management company and clearly define all inspection, maintenance and replacement activities necessary to ensure the drainage system remains effective for the lifetime of the development. The LLFA would be content for this information to be secured and submitted through a suitably worded planning condition and subsequently approved as part of the discharge of conditions process.

Conclusion

Whilst the LLFA is satisfied with the principle of the proposed positively drained strategy, the use of greenfield runoff rates, the adoption of the 10% urban creep and 50% climate change allowances, the drainage hierarchy assessment, the conclusion that infiltration is not viable, and the proposed SuDS treatment train of swales and attenuation basins in principle.

In summary, further information is required regarding:

- Exceedance routing and controlled overflow arrangements from attenuation basins and flow control chambers;
- The need for cut-off drains or filter drains along the western boundary above existing residential properties;
- Clarification of flow control arrangements associated with the final attenuation basin;
- Review of the surface water flood risk and interaction with the SW strategy in the eastern area of the site.
- Provision of maintenance access tracks to all basins and SuDS assets;

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- Provision of silt traps or sediment forebays in the attenuation features;
- Submission of a CIRIA C753 treatment train assessment demonstrating compliance with the required pollution hazard and treatment indices; and
- Submission of a SuDS operation and maintenance schedule identifying the long-term asset owner and management arrangements (which may be secured through a planning condition and provided at discharge of conditions stage).

Yours sincerely

Shamus Giles
Lead Officer - Flood & Development Management