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Copeland area Planning Department, Cumberland Council

For the attention of Heather Morrison

Date: 13 January 2026  
Your reference: 4/25/2411/0F1

Dear Heather Morrison

### **CONSULTATION ON PLANNING APPLICATION**

**Appn:** 4/25/2411/0F1  
**Site Address:** PLOTS 9 & 12 LECONFIELD INDUSTRIAL ESTATE, CLEATOR MOOR. CA25 5QB  
**Proposal:** FULL PLANNING PERMISSION FOR THE ERECTION OF 2NO. BUILDINGS FOR B2 GENERAL INDUSTRIAL AND ANCILLARY OFFICE USE, COMPRISING 6,356SQM GEA FLOORSPACE, ASSOCIATED CAR PARKING, HARD AND SOFT LANDSCAPING, ASSOCIATED INFRASTRUCTURE AND LANDSCAPING AND BIODIVERSITY ENHANCEMENTS ACROSS THE WIDER LECONFIELD ESTATE

Thank you for your consultation on the above Planning Application.

The Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) can confirm as follows :

It should be noted that the overarching principles, acceptability, impact and mitigation measures on the Highways and Surface Water management / flood risk matters for the wider Leconfield Industrial Estate redevelopment have been considered in the live CMIQ Masterplan Application 4/22/2308/0O1. These two plots / buildings are in Phase 1. The responses below are consistent with the recommendations the LHA and LLFA made at the time.

#### **Local Highway Authority response:**

##### **Transport Assessment**

The trip generation and principles have been agreed with the applicant as explained in the TA, based on the Masterplan Application taking into account the reduction in the proposed development area from 9,735 to 6,436 m2.

### Highway Safety

Having reviewed the evidence, the LHA can agree there is nothing to suggest an existing safety issue with no clearly identifiable clusters. Following a review of the records, it is agreed there is not an existing safety issue that is likely to be exacerbated by the proposed development.

### Access and Layout

I note the new proposed access road is 7.3m wide as required by the CDDG for commercial development.

Turning diagrams have been provided which demonstrate the layout is suitable.

### Active Travel and Infrastructure

I note and welcome the proposed 3m wide shared path set-back from the road by a 3m wide verge. There are also cycle parking and stands proposed, as well as the potential for cycle maintenance stand.

However, there is some discrepancy over the number of cycle parking spaces. In the application form it states 36, but in the TA it suggests  $2 \times 13 = 26$ . Thus detail and the type of stand / shelter can be clarified in the Discharge of Conditions. The applicant is encouraged to provide the upper figure of 36 spaces and is reminded these spaces should be a mix of long stay, short stay and adaptive provision

There are also the required links to the C2C path to the perimeter of the site.

Junction capacity and sustainable travel routes / accessibility and permeability was examined in the Outline Masterplan application. The recommended measures and contributions are set out in the contributions and off-site highway improvements below.

### Parking

I note that the proposed car parking provision is slightly less than the CDDG standard 113 vs 129 in the CDDG). However, bearing in mind the provision of oversized spaces and the distance from the public highway, it is considered unlikely that there will be a material impact on the highway. Any overspill car parking is likely to occur on the estate roads, possibly causing some minor inconvenience but as the roads are 7.3m wide, this is not likely to be a critical problem.

Financial Contributions and Off-suite highway improvements

As previously recommended in Application 4/22/2308/0O1:

<b>Active Travel</b>			<b>Local Plan contributing Site(s)</b>
<i>ID5 &amp; ID10</i>	<i>Providing off-road cycle access to the NCN 71 from Leconfield Estate</i>	£8,300	<i>Leconfield Hub (Area 1) application</i>
<i>ID5 &amp; ID10</i>	<i>New signalised pedestrian crossing near Bowthorn Road to connect to bus stops on Leconfield Street</i>	£45,000	<i>Leconfield Area 3 sites</i>
<b>Public transport</b>			
<i>ID17</i>	<i>Improved bus shelter on Leconfield Street</i>	£5,500	<i>Leconfield Hub (Area 1) application</i>
<b>Local Highway Network Junctions</b>			
<i>ID31 Moresby Road / Cleator Moor Road / Main Street, Whitehaven</i>	<i>Proposed signalisation of Moresby Road / Cleator Moor Road / Main Street junction</i>	£805,800	<i>All sites to contribute proportionally across the Local Plan development sites listed in table 9-5.</i>
<i>ID32 Cleator Moor Road / Overend Road, Whitehaven</i>	<i>Proposed signalisation of Cleator Moor Road / Overend Road junction</i>	£332,400	<i>All sites to contribute proportionally across the Local Plan development sites listed in Table 9-5.</i>

The above have been addressed as follows:

- The cycle link is provided for in the proposal
- The proposed crossing near Bowthorn Street is associated with Phase 3.
- The bus shelter is being provided through the Town Deal scheme.

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The impact on junctions 9 and 10 in the TA have been identified for Percentage Impact Assessments. According to the TA, these show relatively small %age impact from the development of 1.2% - 1.4%. However, whilst the net increase is between 1 and 2 % including base traffic (including growth), the justification of the identified highway improvements in the TIS is based on the capacity impact of the committed development traffic. The attached methodology uses the outline TA figures for the whole site trips and the trips estimated for the Units 9 and 12.

Since no pre-determined methodology exists or is included in the TIS, I have taken the average impact from this proposal as %age of the total committed trips and used that as a proportional request for both ID31 and ID32. With indexation applied, the financial contributions to these two highway improvements are:

**ID31 Moresby Road / Cleator Moor Road / Main Street**

- Total cost identified in the TIS = £805,800,
- Contribution requested (with indexation) = £74,032

**ID32 Cleator Moor Road / Overend Road**

- o Total cost identified in the TIS = £332,400
- o Contribution requested (with indexation) = £30,039

Both to be paid prior to prior to first occupation.

**Travel Plan**

The interim Travel Plan is considered suitable. It contains acceptable targets and measures , even if the targets of a 6% modal shift away from private car use seems low. This target can be reviewed and revised if necessary in the final TP to be submitted as part of the DoC.

**LHA Conclusion**

The LHA has no objection to the proposals but recommends the following conditions are included in any consent:

**The carriageway, footways, footpaths, cycleways, cycle parking etc shall be designed, constructed, drained to the satisfaction of the Local Planning Authority and in this respect further details, including longitudinal/cross sections, shall be submitted to the Local Planning Authority for approval before work commences on site. No work shall be commenced until a full specification has been approved. Any works so approved shall be constructed before the development is complete.**

*Reason: To ensure a minimum standard of construction in the interests of highway safety.*

**Development shall not commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the local planning authority. The CTMP shall include details of:**

- Retained areas for vehicle parking, manoeuvring, loading and unloading for their specific purpose during the development;
- Cleaning of site entrances and the adjacent public highway;
- Details of proposed wheel washing facilities;
- The sheeting of all HGVs taking spoil to/from the site to prevent spillage or deposit of any materials on the highway;
- Construction vehicle routing;
- The management of junctions to and crossings of the public highway and other public rights of way/footway;
- Details of any proposed temporary access points (vehicular / pedestrian)
- Surface water management proposals during the construction phase

*Reason: To ensure the undertaking of the development does not adversely impact upon the fabric or operation of the local highway network and in the interests of highway and pedestrian safety.*

**Within 6 months of the development (or any part thereof) opening for business, the developer shall prepare and submit to the Local Planning Authority for their approval a Final Travel Plan with baseline survey, based on the approved Framework Travel Plan. This Travel Plan shall identify the measures that will be undertaken by the developer to encourage the achievement of a modal shift away from the use of private cars to visit the development to sustainable transport modes.**

*Reason: To aid in the delivery of sustainable transport objectives.*

**Annual monitoring of the Travel Plan shall be undertaken for 5 consecutive years from the baseline survey date. Annual monitoring reports shall be submitted to the LPA within 8 weeks of each survey and shall include: survey datasets, analysis of mode share and trips, progress against targets, measures delivered, proposed adjustments, and any remedial actions where targets are not met.**

*Reason: To aid in the delivery of sustainable transport objectives.*

### **Financial Obligations / Condition**

**Prior to first occupation of the development, the applicant shall pay a Travel Plan Monitoring Fee of £6,600 to the Local Highway Authority to fund monitoring of the approved Travel Plan for a period of five years from the baseline survey date.**

*Reason: To ensure the Travel Plan is effectively monitored and enforced, promoting sustainable travel and mitigating transport impacts in accordance with local and national policy.*

**No development shall be occupied until a financial contribution of £74,032 towards 'Moresby Road / Cleator Moor Road / Main Street' improvement (ID31) and £30,039 towards the cost of junction improvement works at 'Cleator Moor Road / Overend Road' (ID32) has been paid to the Local Planning Authority. The contribution shall be used solely for the purpose of delivering the identified highway improvement scheme necessary to mitigate the impact of the development. Evidence of payment shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of any dwelling or building within the development.**

*Reason: To ensure that the development does not result in an unacceptable impact on highway safety and to secure necessary mitigation measures in accordance with Local Policy and the National Planning Policy Framework.*

### **Lead Local Flood Authority response:**

#### **Flood Risk Assessment**

Having reviewed the FRA and the latest NAFRA2 flood risk mapping I am satisfied that the site area is in Flood Zone 1 and that the risk of flooding from all sources is Low. The proposed uses of land are appropriate in this Flood Zone and the LLFA is satisfied there is no material risk of flooding to the site.

#### **Surface Water Drainage Strategy**

##### ***Discharge Destination***

- Due to the made-ground, high groundwater level and very variable measured infiltration rates the LLFA accept that infiltration is not feasible. The proposal to discharge to Nor Beck is acceptable.

##### ***Impermeable Areas and Restricted Discharge Rate***

- I note the proposed hub development site is included in the impermeable area calculations for flow control. The total impermeable area is approximately 2.15 Ha.
- The proposed brownfield discharge rate is 87 l/s, which is a 50% betterment (the minimum acceptable betterment accepted by the LLFA), however, this figure seems to have been calculated from just the existing developed / brownfield area on Dwg CMIQ-BGP-01-ZZ-DR-C-52-01901 totalling only 1.24 Ha.

- The other area of the proposed site on the same plan is shown to be woodland and grass. There are impermeable areas on these 'greenfield' areas that do not appear to have been accommodated in the design.
- These greenfield areas should be included in the controlled flow rate and this attenuation requirements as well. The contributing surface water flows from the greenfield areas should be calculated at greenfield equivalent flows.

#### *Attenuation*

- Attenuation is provided by way of an attenuation tank. I note that the required climate change allowance of 50% has been included.
- The proposed attenuation types is acceptable in principle. The size / volume needs to be clarified in light of the above comment in the detailed design.

#### *Treatment*

- The SUDS pollution indices assessment shows that the combination of permeable paving and the downstream defender delivers the required treatment.

#### *Maintenance / Management*

- The proposed management and maintenance arrangements in the SUDS Management Plan and Drawing are comprehensive and contain all the necessary measures. The LLFA finds these proposals acceptable.

#### **Conclusion:**

The LLFA find the surface water design satisfactory and have no objections to the proposals.

However, we recommend the following condition is included in any consent:

**Prior to the commencement of any development, a surface water drainage scheme, , based on the hierarchy of drainage options in the National Planning Practice Guidance shall be submitted to and approved in writing by the Local Planning Authority. (Refer to the CDDG Appendix 7 for list of documents and evidence to be submitted)**

**The surface water drainage scheme must be in accordance with the National Standards for Sustainable Drainage Systems (July 2025) 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.**

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**The drainage scheme submitted for approval shall also be in accordance with the principles set out in the Drainage Philosophy proposing surface water discharging indirectly to Nor Beck.**

**The works shall be constructed, 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