

Our Ref: 784-B028221

**Mr G Beattie**  
Alpha Design

Date: 17 April 2023

**Dear Glen**

## **APPLICATION NUMBER 4/23/2083/0F1**

### **LAND AT HARRAS ROAD WHITEHAVEN – TRANSPORT MATTERS**

We have been appointed by John Swift Homes Ltd to advise on transport and highway matters in relation to the above application for 23 homes. We were also similarly appointed in relation to application number 4/22/2135/0F1 for 23 homes.

The current application is a resubmission of 4/22/2135/0F1 and is identical in all respects.

Application 4/4/22/2135/0F1 was reviewed by Cumbria CC, the local highway authority, who offered no objection subject to a number of planning conditions being applied, and the planning officers at Copeland BC recommended that the application be approved. However, Members resolved at the March Planning Panel to refuse the application for a single highway reason: -

*“The proposed development will result in an increase in traffic and pedestrian movements onto Harras Road to the detriment of highway safety and will also result in severe residual cumulative impacts on the road network, with specific regard to capacity and congestion on the public highways known as Harras Road and the network surrounding St James’ C of E Junior School. Given the constraints of the public highways and junctions the impacts of the proposed development on highway safety and capacity and congestion cannot be cost effectively mitigated to an acceptable degree. The development is in conflict with the requirements of policies ST1 and T1 of the Copeland Local Plan 2013-2028 and Paragraphs 110 and 111 of the National Planning Policy Framework”.*

### **Traffic Generation**

The reason for refusal refers to the level of traffic generated by the proposed development. That generation has to be set within the context of approvals recently granted by Copeland BC which affect traffic flows on Harras Road. These are set out below.

- Land at Harras Dyke. The combined outline planning permissions on this site (4/16/2415/001 and 4/16/2416/001) granted approval for 110 dwellings accessed from Harras Road.
- Land Adjacent to Casa Mia, Harras Road. The permission for this site granted approval for 9 dwellings (4/18/2347/001) accessed from several accesses on to Harras Road

Based on these two site approvals, Copeland BC considered that the traffic generated by 119 dwellings was acceptable on Harras Road and surrounding roads.

The volume of traffic generated by these approvals has been determined using the TRICS database and are summarised for the busiest times of the day, the AM and PM peak hours, in Table 1 below.

**Table 1: Approved Vehicles Trip Generation**

	Arrivals	Departures	Total
<b>Harras Dyke (110 Dwellings)</b>			
<b>Weekday AM Peak Hour</b>	16	38	54
<b>Weekday PM Peak Hour</b>	34	17	51
<b>Land Adjacent Casa Mia (9 Dwellings)</b>			
<b>Weekday AM Peak Hour</b>	1	3	4
<b>Weekday PM Peak Hour</b>	3	1	4
<b>Total (119 Dwellings)</b>			
<b>Weekday AM Peak Hour</b>	18	41	59
<b>Weekday PM Peak Hour</b>	37	19	55

As can be seen the combined traffic generation of the two sites on to Harras Road is 59 vehicles in the AM peak hour and 55 in the PM Peak hour.

In 2022 Reserved Matters applications (4/21/2195/0R1 and 4/2/2196/0R1) were approved for the Harras Dyke site which reduced the number of dwellings from 119 homes to 90 homes.

In 2022 a detailed application (4/22/2135/0F1) was submitted by John Swift Homes for 23 homes to be constructed on the Land Adjacent to Casa Mia site. This application would replace the 9 homes approved under application 4/18/2347/001.

Taken together, the reduced housing numbers at Harras Dyke and the increase in at the Land Adjacent to Casa Mia site if approved, would result in 113 homes being provided on Harras Road. That is 6 dwellings fewer than that previously consented and deemed acceptable in terms of its impact on the local road network and on road safety.

The reduced number of homes results in a reduction in the traffic generated by the two sites, and is summarised in Table 2 below.

**Table 2: Proposed Vehicle Trip Generation**

	Arrivals	Departures	Total
<b>Harras Dyke (90 Dwellings)</b>			
<b>Weekday AM Peak Hour</b>	13	31	45
<b>Weekday PM Peak Hour</b>	28	14	42
<b>Land Adjacent Casa Mia (23 Dwellings)</b>			
<b>Weekday AM Peak Hour</b>	3	8	11
<b>Weekday PM Peak Hour</b>	7	4	11
<b>Total (113 Dwellings)</b>			
<b>Weekday AM Peak Hour</b>	17	39	56
<b>Weekday PM Peak Hour</b>	35	18	53

As can be seen from Table 2, the combined traffic generation of the approved Reserved Matters at Harras Dyke site and the proposed Land Adjacent to Casa Mia site on Harras Road is 56 vehicles in the AM peak hour and 53 in the PM Peak hour.

The combined effect is to reduce the AM peak hour traffic generation on Harras Road by 6 vehicles, and by 2 vehicles in the PM peak hour.

Whilst the above assessment refers to vehicles, there is also a similar relationship between the number of pedestrian movements generated and the quantum of residential development. Fewer homes will result in fewer pedestrian movements.

As a result, the combination of 90 homes at Harras Dyke and 23 homes at Land Adjacent to Casa Mia will result in less traffic generated and fewer pedestrian movements compared to the 119 homes at Harras Dyke and 9 homes at Land Adjacent to Casa Mia. The higher level of development was considered acceptable by Copeland BC, and there are no reasons why a lower level of development would be unacceptable.

### **Traffic Distribution**

The reason for refusal also refers to the impact of the development on congestion at safety on Harras Road and the network surrounding St James' C of E Junior School. We have assessed the likely distribution of generated traffic of the two sites using the Census Journey to Work data for the local area.

Traffic is distributed as follows 78% of trips are towards Red Lanning, where 65% then travel south and 13% travel north. The remaining 22% of trips travel west on Harras Road, towards Victoria Road-Oakbank Road. At Albert Terrace, 6% turn right and access the A595 North by the Sunny Hill pub, while 16% travel through the archway to Solway Road and past St James' C of E Junior School into Whitehaven town centre.

Figure 1 and Figure 2 show the distributed traffic for 119 homes at Harras Dyke and 9 homes at Land Adjacent to Casa Mia respectively for the AM and PM peak hours. This shows that in the AM peak 10 vehicles are predicted to pass through the archway and past the Junior school, with 9 in the PM peak. It should be noted that the school is closed during the PM peak hour.

Figure 3 and Figure 4 show the distributed traffic for 90 homes at Harras Dyke and 23 homes at Land Adjacent to Casa Mia respectively for the AM and PM peak hours. This shows that in the AM peak 9 vehicles are predicted to pass through the archway and past the Junior school, with 9 in the PM peak.

From a comparison of the diagrams, it can be seen that there is a small reduction in the volume of generated traffic passing the school in the AM peak hour and no change in the PM peak hour. Therefore there is a reduction in traffic using the archway and passing in front of St James' C of E Junior School compared to that previously approved at the two sites.

In relation to the proposed development at Land Adjacent to Casa Mia an additional 14 homes are proposed above that previously approved at this site. This would result in 7 additional vehicular trips in the AM peak hour of which 16% would be expected to pass through the archway and past the Junior school. That is, the additional 14 homes at the Land Adjacent to Casa Mia site, ignoring the effects of Harras Dyke would result in just 1 additional vehicle passing through the archway and past the Junior school. Given the existing levels of traffic on Solway View it is considered that the change in traffic as a result of the additional homes would be barely noticeable, is much less than typical daily variation and certainly would not result in a severe residual cumulative impact.

### **Conclusion**

In conclusion, Copeland BC have approved 110 homes at Harras Dyke and 9 homes at Land Adjacent to Casa Mia and so clearly considered the resulting impact of 119 homes was acceptable in terms of traffic impacts on the local road network and on road safety.

With the reduction in homes at the Harras Dyke site and the increase in homes at the Land Adjacent to Casa Mia site there is an overall reduction from 119 homes to 113 homes. This results in a reduction in both the volume of generated traffic and in pedestrian movements. It is an overall benefit to the local road network in road safety and congestion terms.

There has been no change in circumstances on Harras Road or the surrounding network which would mean that the reduced level of traffic generated by 113 homes would be unacceptable, whereas 119 homes was recently acceptable.

With reference to the impacts at the archway and at St James Junior School, these are less with 110 homes at Harras Dyke and 23 homes at Land Adjacent to Casa Mia, compared to the previous approvals. This is an overall benefit in road safety and congestion terms at the archway and past the Junior school.

With reference to the increase of 14 homes (from 9 to 23 homes) at Land Adjacent to Casa Mia this is predicted to result in an increase of 1 vehicular movement in the AM peak hour through the archway and past St James Junior School. This increase is barely noticeable given the existing traffic levels on Solway View.

The NPPF advises that developments should only be refused on highway grounds if the cumulative residual impact is severe or there is an unacceptable effect on road safety. It is clear that, compared to previous approved levels of development, there is a reduction in generated traffic, and a reduction at the archway and past St James Junior School. This is an overall benefit in road safety and congestion terms.

The impact of the additional houses at Land Adjacent to Casa Mia is extremely low at the archway and past St James Junior School, and are low elsewhere. The proposed development at Land Adjacent to Casa Mia does not have a severe cumulative residual impact nor an unacceptable impact on road safety.

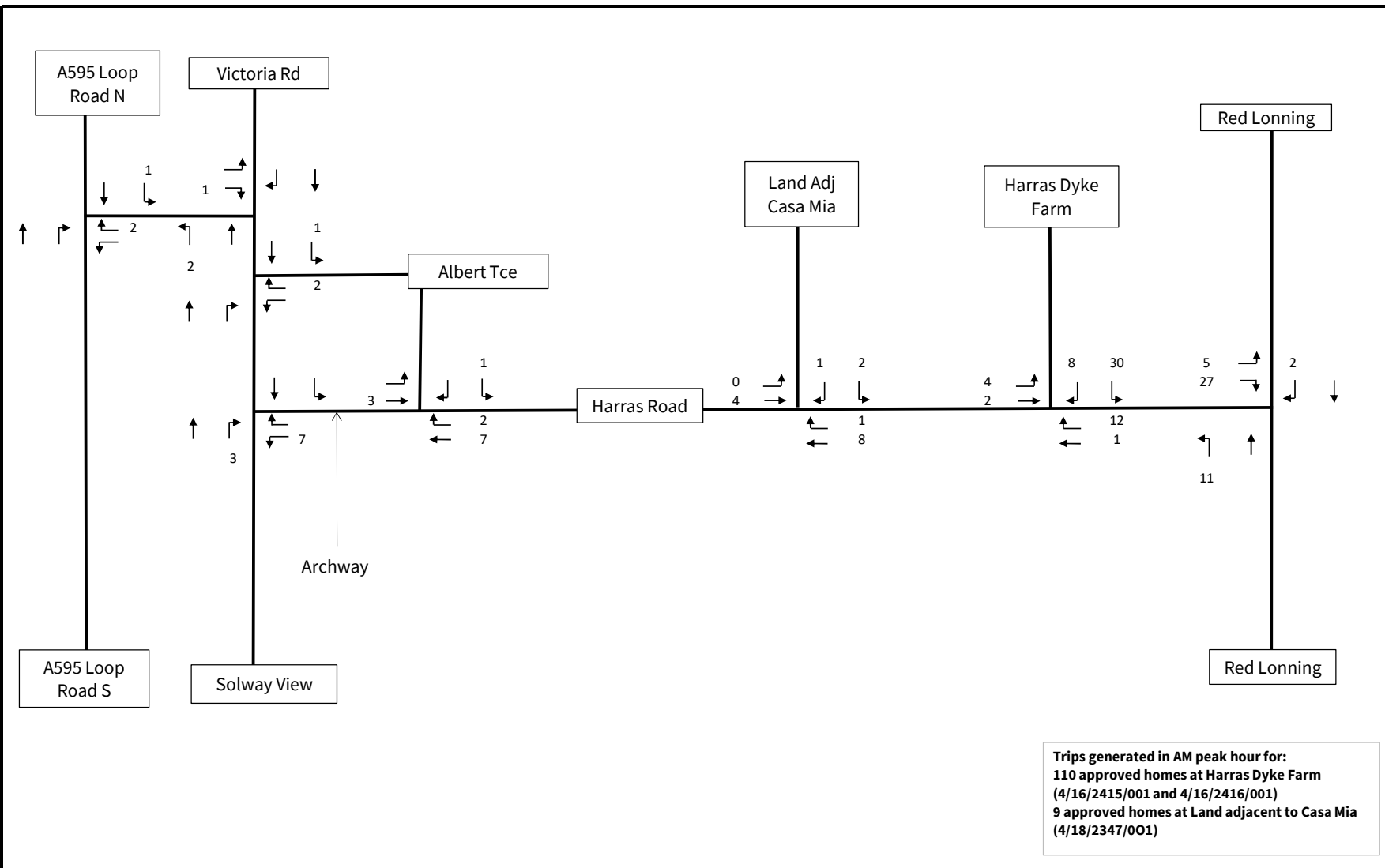
As a result, there is no breach of policies ST1 and T1 of the Copeland Local Plan 2013-2028 or of paragraphs 110 and 111 of the National Planning Policy Framework and so a refusal on highway grounds is not justified.

Yours sincerely,

**Dr Nick Bunn**

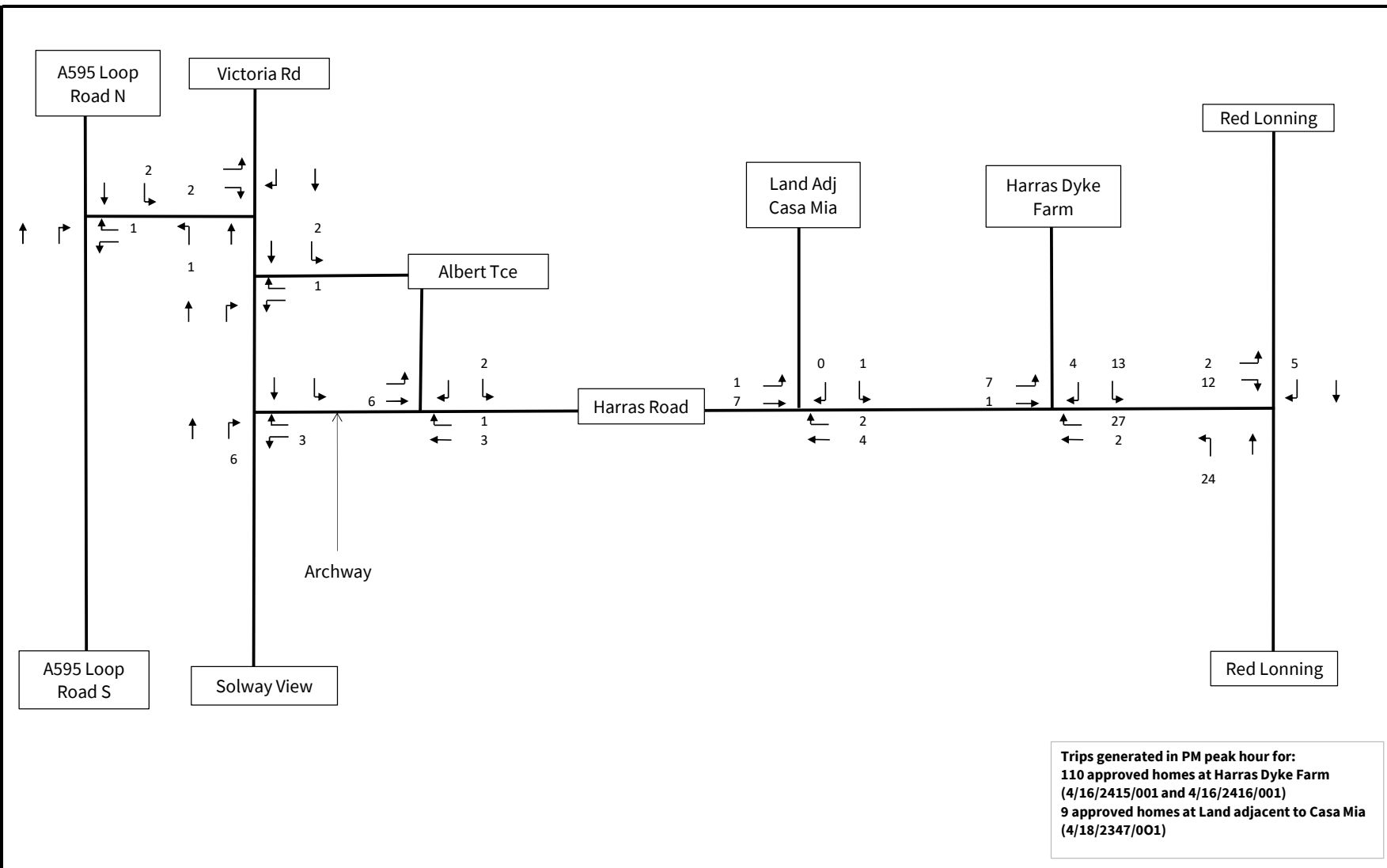
**Director**

For and on behalf of TetraTech Europe



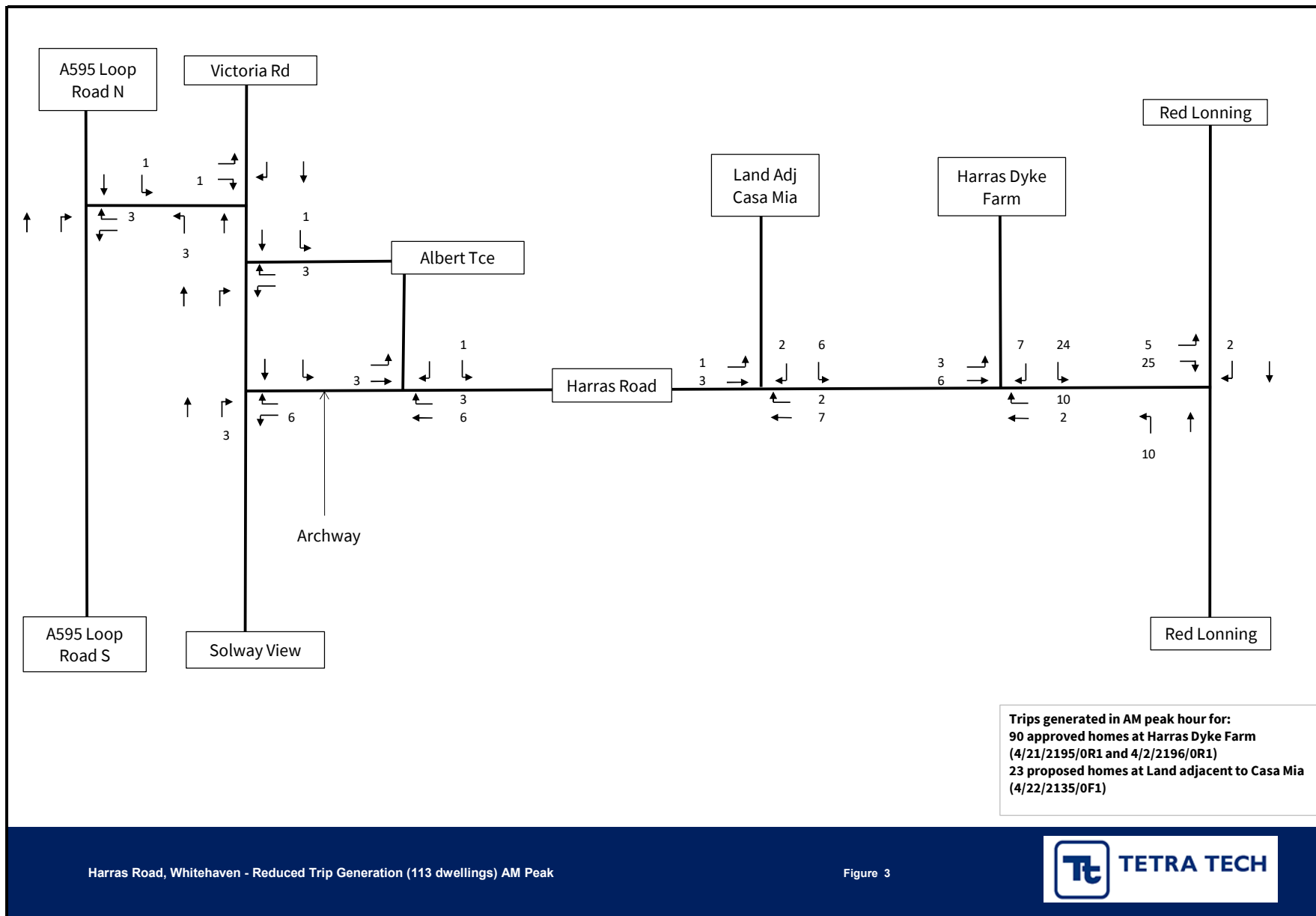
Harras Road, Whitehaven - Approved Trip Generation (119 dwellings) AM Peak

Figure 1



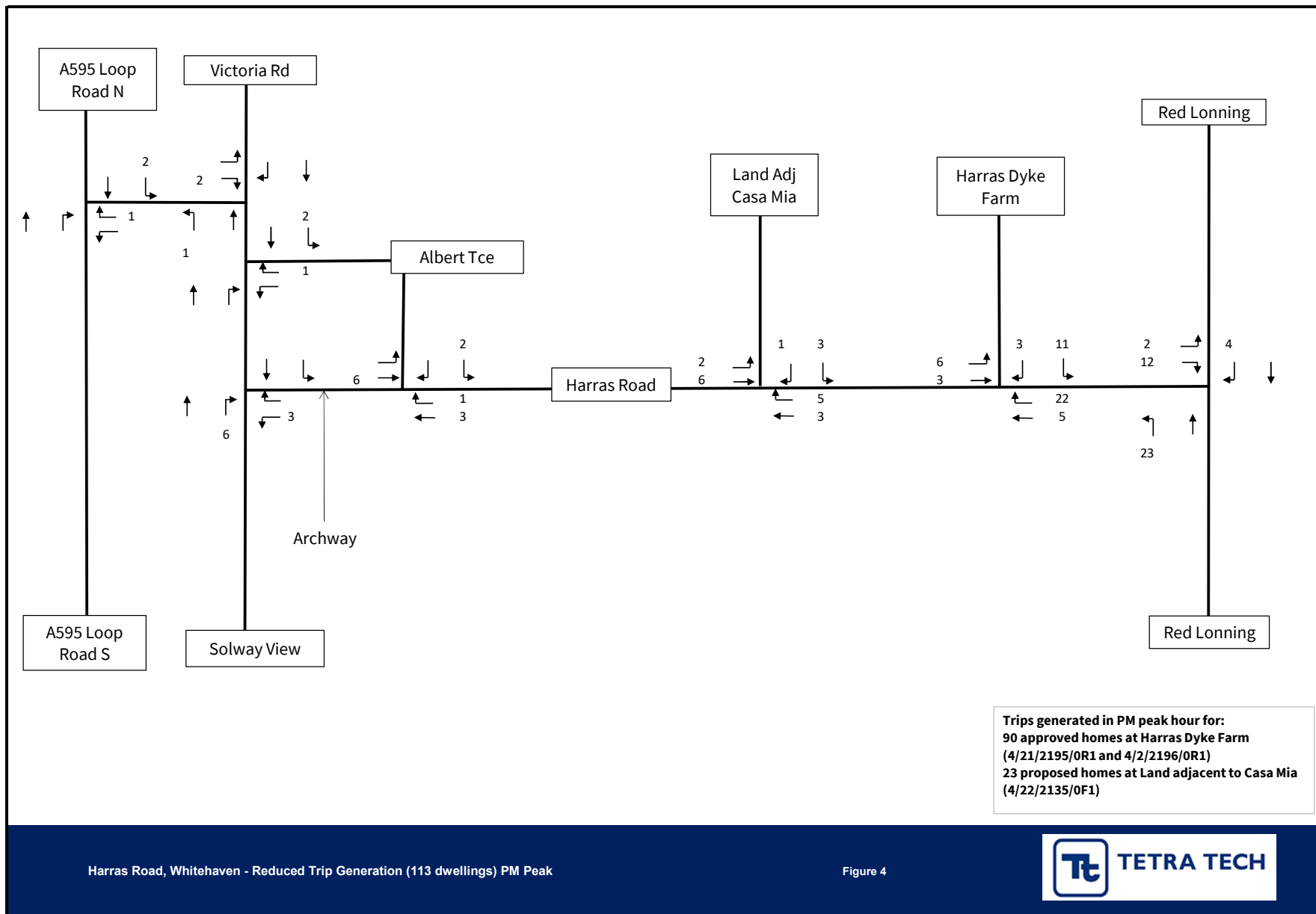
Harras Road, Whitehaven - Approved Trip Generation (119 dwellings) PM Peak

Figure 2



Harras Road, Whitehaven - Reduced Trip Generation (113 dwellings) AM Peak

Figure 3



Harras Road, Whitehaven - Reduced Trip Generation (113 dwellings) PM Peak

Figure 4