



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Bruce Parker (Head of Planning & Development)
Operations Directorate
North-West Region
National Highways
[REDACTED]

To: Cumberland Council
[REDACTED]

CC: [REDACTED]
[REDACTED]

Council's Reference: 4/25/2349/0R1

National Highways Reference: NH/25/13330

Location: Land At Harras 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 and infrastructure pursuant to outline planning approval 4/18/2287/0O1 (the outline was not an EIA application).

Referring to the consultation on a planning application referenced above, in the vicinity of the A595 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

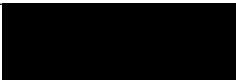
Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningNW@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: 	Date: 08/06/2026
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¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation: No Objection

National Highways Comments

National Highways has reviewed the proposed reserved matters development at Land at Harras Moor, Whitehaven. The site is located to the east of the A595 trunk road, which forms part of the Strategic Road Network (SRN). Access to the site is taken via the local highway network, with no direct connection to the SRN.

The application seeks approval of reserved matters (appearance, layout, landscaping and scale) for 300 dwellings pursuant to outline planning permission 4/18/2287/001, for which the principle of development has already been established. National Highways previously raised no objection to the outline application.

The amendments made to the original submission do not alter the approved access arrangements, which remain via the local highway network, and therefore do not introduce any new or modified points of access to the SRN.

There is no evidence to suggest that the amendments would materially change traffic generation, distribution, or routing to the SRN compared to that assessed at outline stage. Furthermore, the updated Active Travel Plan promotes improved walking and cycling connectivity, supporting a reduction in reliance on private car use in line with national policy.

As the development does not create or amend access to the SRN and the nature of the amendments is limited to internal and localised changes, there is no indication that the proposal would have a material impact on the safety, capacity, or operation of the A595.

On this basis, National Highways has no objection to the proposed development.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift

away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.