
Copeland area Planning Department, Cumberland Council

For the attention of Christopher Harrison

Date: 6 November 2025

Your reference: 4/25/2336/0F1

Dear Christopher Harrison

CONSULTATION ON PLANNING APPLICATION

Appn: 4/25/2336/0F1
Site Address: FORMER JEWSON SITE, COACH ROAD, WHITEHAVEN
Proposal: CHANGE OF USE TO FORM A TEMPORARY 24 HOUR CAR PARK
COMPRISING OF 95 PARKING SPACES INCLUDING 7 DISABLED
PARKING SPACES

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 :

Local Highway Authority response:

I welcome the comprehensive Transport Assessment. This clearly and thoroughly explores the highway safety and capacity impacts of the development on the local highway network. Having reviewed the TA, I have noted the following key findings and conclusions:

Trip Generation and Impact of Junction Capacity

- The junction modelling has incorporated the necessary committed development trips and growth to the design year of 2030
- The most acutely affected junctions are (unsurprisingly) the junctions at either end of Coach Road with Corkickle and Preston Street.
 - The Preston Street junction shows an increase in RFC from 0.75 to 0.84 and a maximum increase in delay (in the PM peak) of 21s average delay. Whilst this will be noticeable and frustrating, this peak delay period will be relatively short and the junction is still shown to operate within capacity. This does not represent a severe impact on existing traffic conditions.
 - However, the Corkickle junction shows a peak Degree of Saturation (DoS) (on the Coach Rd arm) increase from 74.6% to 80.2% - this is in the PM peak again, as expected. As confirmed in the TA, a DoS of over 80% is concerning as it is approaching the recommended limit of 85%. However the report says that with

'optimisation' of the signals, this DoS can be reduced to an acceptable 67.4%. This observation and proposal is accepted by the LHA and carrying out this work will offset the impact of the proposal at this junction.

- The developer will be required to pay a sum of £3,500 to the LHA to carry out this reconfiguration and optimisation of the traffic signals. This will be payable through a suitably worded legal agreement, which will be conditioned in a final response.

Highway Safety

Injury Collisions

- I note there were eight recorded injury collisions in the last five years in the vicinity of the site and Coach Rd. Whilst this is higher than some other typical urban roads, analysis of the causation shows no underlying patterns or common causes.

Visibility at the Access

- I note that the car park will use the existing access onto Woodstock Lane. This has very limited visibility at present (7m) and is a concern although traffic flows are very light on Woodstock lane due to the intensification of use of the junction.
- However I see from the TA that the visibility at the access junction will be improved by removing / altering the boundary palisade fence to provide a splay of 2.4m x 20m to the left for existing vehicles. This will be acceptable to the LHA but this is not shown on any drawings. The LHA would wish to condition this visibility splay by referring to an approved drawing. Please submit a drawing showing the splay and work required.

In summary, there is no reason to conclude that the proposal will have an unacceptable impact on Road Safety.

Active Travel Provision

I note and welcome the pedestrian link to the C2C cycleway. This will provide a more direct and traffic-free route to the town centre.

Lead Local Flood Authority response:

Flood Risk

I note from the FRA and my analysis of the EA flood mapping that a small portion of the site is in Flood Zone 2. As stated, though, a car park is classified as 'less vulnerable' and is therefore permitted.

However, the FRA fails to take into account the risk of flooding from surface water. Looking at the EA SW flood maps, you can see that nearly the whole car park area is in

the high flood risk category. Whilst the car park is permitted type of development in the flood zone, the flood risk should still be taken into account in the surface water drainage strategy.

Surface Water Drainage Strategy

The surface water drainage strategy is very basic. In fact it basically retains the existing drainage network and outfall to Pow Beck with no attenuation, flow control or additional treatment provided. I appreciate that the proposal is an 'interim' public car park and that it is being formed on a surfaced area that used to be a builders yard, i.e a pre-developed site, but the default starting position for any development is that the surface water run-off should be the equivalent to the greenfield run-off. The strategy should comply with the 'National Standards for SUDS - June 2025' unless there is compelling reasons why this would not be practicable or necessary. There is a clear opportunity here to manage the surface water run-off to reduce flood risk downstream.

In terms of the maximum allowable run-off rate, the LLFA expects surface water drainage schemes on brownfield development sites to follow the same principles as if the site is greenfield. If it is unfeasible to restrict runoff rates back to the 1 in 1-year greenfield runoff rate or the alternative flow matching approach, the LLFA will accept discharge rates to be restricted to as close as feasibly possible to the 1 in 1-year greenfield runoff rate or flow matching rates with limiting to a 50% betterment of the brownfield 1 in 1-year runoff rate or flow matching rates as a last resort.

If this approach is to be chosen, then it should be clearly evidenced that restricting to the greenfield rate is unfeasible and that the new rate proposed is as close as feasibly possible to the 1 in 1-year greenfield runoff rate or flow matching rates. This supporting evidence should include a range of rates and the corresponding storage volumes associated with those rates. It should be noted that a 50% betterment is a last resort option and is only acceptable when lower rates are proven to be unviable.

In the absence of any treatment measures, the intensification of vehicle parking on the impermeable surface of the car park presents a risk of increased pollution to Pow Beck, highlighting the need for appropriate SuDS treatment components as guided by the CIRIA SuDS Manual indices to mitigate runoff contaminants.

I also note that the current yard falls towards the highway and there is no threshold drainage. With a resurfaced car park, measures should be included to prevent surface water discharging onto or off the highway.

LHA and LLFA Conclusion:

Inadequate information has been submitted to satisfy the Local Planning Authority that the proposal is acceptable in terms of:

- visibility splay diagram
- surface water drainage (volume, flow rate and water quality)
- No provision has been made within the site for the disposal of surface water and it is therefore likely to discharge onto the public highway, which would be prejudicial to public safety.

In light to the above comments additional details are required from the applicant.
Upon receipt of the amended plans I shall be better placed to provide full response,
otherwise I have no other alternative but to recommend refusal.

I welcome direct discussions with the applicant to discuss these matters if required.

Yours sincerely

Shamus Giles

Lead Officer - Flood & Development Management