
Copeland area Planning Department, Cumberland Council

For the attention of Christie M Burns

Date: 27 July 2026

Your reference: 4/26/2203/0F1

Dear Christie M Burns

CONSULTATION ON PLANNING APPLICATION

Appn: 4/26/2203/0F1
Site Address: QUEENS PARK, MILLOM
Proposal: RESIDENTIAL DEVELOPMENT OF 47 DWELLINGS AND ASSOCIATED EXTERNAL WORKS

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:

Following review of the submitted site layout plans, Design & Access Statement and having regard to the pre-application discussions undertaken with the applicant team in July 2024, it is considered that the proposal has satisfactorily addressed the key highway, access, matters relevant to the development.

Access and Highway Considerations (LHA)

The proposed development reuses the established access and circulation arrangements and internal road network associated with the former residential estate. The submitted information confirms:

- Retention of the existing street layout.(these are adopted highways) and public footpath network.
- Good existing vehicular and pedestrian connectivity to surrounding residential areas and local facilities and services.

The development therefore represents redevelopment of a previously occupied housing estate rather than the creation of a new access point or new highway network. The

principle of residential access has already been established through the site's historic use and previous planning permission for residential redevelopment.

I note that there were no road markings or waiting restrictions of any sort on the road network of Queen's Park and it is proposed to keep the status quo. This layout is perhaps somewhat unusual in that there is no clear traffic direction or control, but in these low-speed residential environments, over-prescribing traffic control (road markings and signs etc) would be unnecessary, and would likely be ignored anyway. Leaving the streets free from conventional road markings introduces a degree of driver uncertainty, which can help to naturally reduce vehicle speeds and create a more pedestrian-focused environment, contributing to a 'home zone' character.

Road markings at the extremities of the scheme will need to be reinstated where the road is resurfaced.

Surface Water Discharge from Driveways

I note that all driveways that fall towards the highway are designed with threshold channel drains to prevent surface water running onto the road.

Parking Provision

The scheme provides:

- A total of 120 parking spaces.
- Two spaces per two-bedroom dwelling.
- 2.5 spaces per three and four-bedroom dwelling.
- Additional visitor parking provision equating to 20% visitor parking.
- Electric vehicle charging facilities for all dwellings.

I am generally satisfied that this provision has been designed in accordance with the Cumbria Highways Design Guide EXCEPT for Plots 7 and 8 (the 4 bedroom houses). These should have 3 parking spaces. Overflow parking for these two dwellings is likely to be on the carriageway / footway rather than the central visitor parking bays as these are not convenient for these two houses. The LHA request that the developer reviews the parking provision for these two houses.

Traffic Generation and Transport Impacts

The site historically accommodated a substantial residential estate and benefitted from an established lawful residential use prior to demolition of the majority of dwellings in 2019. The proposal is therefore considered to be the redevelopment of a former housing site rather than development of a greenfield location.

Given:

- The established residential use of the site.
- The retention of the existing access arrangements and internal road layout.
- The previously approved residential redevelopment of the site.
- The absence of any material changes to the highway network.
- The provision of parking in accordance with adopted standards.

It is not considered that the proposal would result in severe highway impacts or generate traffic effects that would justify the submission of further transport evidence. The existing highway network has historically accommodated residential traffic associated with the site and there is no evidence presented to indicate that the redevelopment would give rise to unacceptable highway safety or capacity concerns.

Public Transport

The site is located within easy walking distance of existing bus stops served by the M1 and X7 services, together with Millom railway station. Given the site's accessibility by public transport and its redevelopment of a former residential estate, it is considered that the existing public transport provision is sufficient to serve the development

Active Travel

In the absence of garages, and with the houses being compact, there is nowhere to store bicycles in the property curtilage. To promote active travel, especially short journeys to shops and schools etc, it is important to have convenient access to bikes and the like, that are stored securely. The LHA request that every house has a secure, weatherproof cycle store in the garden / driveway.

Works to the Highway

The application red line includes areas of adopted highway where kerb alterations, footway improvements, carriageway resurfacing and the renewal/replacement of existing highway lighting are required to facilitate the development. Whilst these works may be assessed as part of the planning application, planning permission does not grant authority to undertake works within the public highway. Any works affecting the adopted highway, including alterations to kerbs, footways, carriageways, drainage infrastructure and street lighting assets, will require separate approval from the Local Highway Authority and are to be delivered through a Section 278 Agreement under the Highways Act 1980. Subject to securing the necessary highways agreements and technical approvals, no objection is raised to the principle of these works.

However, we need some clarification, designs or at least agreement in principle to rectify / carry out the following in relation to Highway Adoption and highway reconstruction proposals. More extensive reconstruction of the carriageway and footway will be required over and above what has been shown due to the significant localised amendments and disturbance to the integrity of the footways and carriageways which are already in a poor state of repair, with the proposed changes to the kerb, addition of lighting columns etc.

- Please provide a S38 Plan. Please note that the car parking bays in the central island will not be adopted as part of the highway.
- Proposals / details of the extent / depth of the carriageway and footway reconstruction, including construction / cross-section details (this can be conditioned in the applicant agrees)
- Investigation (cores) of the carriageway and footway construction (this can be conditioned if the applicant agrees)
- CCTV evidence / drain survey of the existing highway drainage system (i.e. gullies and gully tails) to remain in place and become adopted. It is possible that these could be damaged or blocked through decades of neglect or damaged through the construction phase.

Highway Lighting

The existing lighting on Queens Park is to footway lighting standard. It is not a system of road lighting and is not lit to any specific standard. At one location there is a span of approximately 70 metres between columns and one column has been cut-down to a stump.

A complete new and CC compliant (i.e. adoptable) system of highway lighting is required. Please submit a new lighting design and specification (this can be conditioned if the

applicant agrees). This system would be from the T junction of Palmers Lane and tie include the existing column position 70350161C as shown below:



Construction Activity Impact

It will be necessary to maintain access (for vehicles and pedestrians) to the two existing dwellings on Queen's Park at all times during construction. This will be a recommended condition to comply with as part of the CTMP.

Conclusion

The LHA finds the proposal acceptable in most regards except for the following so we recommend a holding refusal subject to receipt of acceptable information to address the following matters:

- the driveway parking for the two 4-bed properties.
- Extent / clarification of the S38 extent.
- Extent and details of the S278 works (footway construction / carriageway construction / lighting design).
- Secure, weatherproof cycle store in the garden / driveway of every property.

Lead Local Flood Authority response:

The LLFA has reviewed the submitted Flood Risk Assessment, Drainage Strategy and SuDS Operation and Maintenance Plan. The proposed drainage strategy has been developed in accordance with the principles agreed during pre-application discussions between the applicant, RG Parkins, Cumberland Council LLFA and United Utilities on 18 July 2024. At that meeting it was agreed that, despite the site's former residential use, the site should be assessed on a greenfield basis due to the length of time since the previous dwellings were occupied and demolished, together with known surface water flooding issues elsewhere within Millom. It was further agreed that an attenuation-led drainage strategy with controlled discharge to the existing public combined sewer network represented the most appropriate drainage solution for the site.

The submitted drainage strategy follows the surface water hierarchy set out within the NPPF and associated guidance. Infiltration has been appropriately investigated and discounted through site-specific ground investigations and permeability testing, which confirmed low permeability soils and unsuitable drainage characteristics, rendering soakaways and other infiltration-based SuDS unfeasible. Disposal to a watercourse has also been discounted due to topographical constraints, the distance to the nearest suitable watercourse and the requirement to cross third-party land. In the absence of viable infiltration or surface water discharge options, controlled discharge to the existing combined sewer network represents the most appropriate solution.

The strategy incorporates a network of attenuation tanks and flow control devices designed to restrict discharge to the equivalent greenfield QBAR rate of 4.2 l/s whilst providing storage for the 1 in 100 year rainfall event plus 50% climate change allowance. The FRA demonstrates that this will provide a significant reduction in runoff when compared to the former residential development and therefore delivers a betterment over the site's historic drainage performance without increasing flood risk elsewhere.

The site lies wholly within Flood Zone 1 and is not considered to be at significant risk from fluvial, tidal, surface water or groundwater flooding.

A detailed SuDS Operation and Maintenance Plan has been submitted confirming that all attenuation systems, flow controls, silt traps and permeable paving features will be privately managed and maintained by Home Group under an inspection and maintenance regime informed by CIRIA SuDS Manual guidance. The proposed management and maintenance arrangements are considered acceptable and provide confidence that the drainage system will continue to operate effectively for the lifetime of the development.

On this basis, the LLFA is satisfied that the submitted drainage strategy accords with the agreed pre-application principles, follows the drainage hierarchy where practicable, provides appropriate attenuation and climate change mitigation, and includes suitable

long-term maintenance arrangements. However, as stated in the Highway comments above, in terms of the LHA adoption of the highway system we will require confirmation that the system is in a suitable condition.

Conclusion:

The LLFA requires further evidence / information on the condition and suitability of the existing surface water drainage system. I note that a CCTV survey has been carried out by Drain Doctor but this does not appear to be in the submitted documents. . This is required so we can assess the condition and any work required to the existing highway drainage system (i.e. gullies and gully tails) to remain in place and become adopted. It is possible that these could be damaged or blocked through decades of neglect or damaged through the construction phase.

Yours sincerely

Shamus Giles

Lead Officer - Flood & Development Management