
COPELAND BOROUGH COUNCIL
STAGE 2 LOCAL PLAN VIABILITY STUDY
(FINANCIAL VIABILITY ASSESSMENT 2)
ADDENDUM REPORT

Prepared on Behalf of

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GLOSSARY

FVA2 – Copeland Borough Council Stage 2 Local Plan Viability Study dated February 2022 (Draft)

CWR – Cushman Wakefield Consultation Representation dated March 2022

CW – Cushman Wakefield

KM – Keppie Massie

CBC – Copeland Borough Council

CCCR – Cumbria County Council Response

CCC – Cumbria County Council

BLV – Benchmark Land Value

RLV – Residual Land Value

AVIP – RICS Guidance Note: Assessing viability in planning under the National Planning Policy Framework 2019 for England

1.0 INTRODUCTION

- 1.1 KM prepared a Draft Version of FVA2 which was published as part of the Regulation 19 consultation for the Local Plan. This further consultation in relation to FVA2 was intended to enable stakeholders to review the detailed evidence base supporting the study. To provide a more in depth understanding of how the assumptions and inputs adopted in the viability testing had been formulated and the judgements that had been made.
- 1.2 In relation to viability matters there were only two substantive responses received following this further consultation, one from Cushman and Wakefield (CW) on behalf of a consortium of housebuilders and the second from the County Council (CCC). A specific response was also submitted by CW on behalf of Persimmon in relation to the Marchon Site (HWH5) which largely referred back to the comments in their main response. We have read the responses received from CW (the CWR), including that in relation to HWH5 and also the comments from the County Council (CCCR). Having reflected on these documents then if a matter is raised that is considered to be relevant to the outcome of FVA2, we have provided a response and as appropriate amended the contents of FVA2. Footnotes are included in the final version of FVA2 to identify the changes made.
- 1.3 In Section 2 of this Addendum Report we deal with the comments made in these consultation responses and any changes made to FVA2 as a result.
- 1.4 Following on from the Regulation 19 consultation it is understood that some revisions to plan policies are proposed. We have considered these changes and in Section 3 discuss whether there are any implications for the viability testing in FVA2.
- 1.5 At the point that the draft version of FVA2 was published for consultation, discussions were still ongoing between the CCC and CBC regarding the extent of any education contributions that might be required. The viability testing in FVA2 was carried out absent of these contributions and instead consideration was given to the amount of surplus sum generated by each appraisal as an indication of the level of further financial contribution that could be made. Similarly the playing pitch strategy was still ongoing so it was not clear whether any contributions from new development would be required in this connection. As part of the responses received comments have been made regarding the modelling of S106 contributions. We provide at Section 4 an update about developer contributions.
- 1.6 We have also been asked by CBC to undertake additional viability testing based on an adjustment to the tenure of affordable housing with 60% remaining as affordable or social rent, and of the balance, 25% being First Homes and 15% affordable home ownership. The First Homes element being tested at differing market rate discounts namely 40% and 50%. The results of this modelling are contained in Section 5.

- 1.7 In addition, arising from the consultation comments, further viability testing has been carried out based on an alternative housing mix. The results of this additional testing are also contained in Section 5.

2.0 CONSULTATION RESPONSES

2.1 As noted at para 1.3, two responses were received containing specific comments about the methodology and assumptions contained in the draft version of FVA2. Of these representations that from CW was the most substantive however the CCC also made a number of points that we have addressed in this section. Matters raised in both responses regarding S106 contributions are dealt with in Section 4. In responding to the comments made we have grouped these together under the relevant headings.

Local Plan Policies Tested

2.2 The CCCR questions why the following Strategic Policies were not considered relevant to the study:

CO1PU: Telecommunications and Digital Connectivity.

CO2PU: Priority for improving Transport networks within Copeland

CO3PU: Priorities for improving transport links to and from the Borough

CO4PU: Sustainable Travel

2.3 In relation to CO1PU – CO3PU the policies were considered in preparing FVA2 however they do not give rise to development specific requirements with a direct cost for development. It is possible that these policies may give rise to developer contributions requirements and as appropriate these are addressed in relation to viability impacts of Strategic Policy DS5PU: Planning Obligations.

2.4 Any requirements arising from CO4PU: Sustainable Travel have been included in the Housing Allocation Profiles and have been costed and assessed in the viability testing.

Housing Typologies

2.5 CW have raised a number of points under this heading in relation to gross to net site areas and houses mixes and sizes. We have considered each of these points in turn.

Gross/Net Ratio

2.6 Table 4.2 of FVA2 contains details of the gross to net site area ratios that were adopted for the purpose of the viability testing in FVA1. Our experience is that these ratios represent a reasonable average position and hence for consistency in preparing FVA2 we have also sought so far as possible to apply these ratios.

- 2.7 The Local Plan contains an indicative yield for each site but does not specify a minimum density. As noted at para 4.4.9 densities at 30-35 dwellings per net developable hectare are considered to be appropriate to the type and form of new houses expected to be constructed on the allocations. These densities have been applied to derive a net developable site area, and have then been adjusted as necessary to derive a gross to net site area ratio that accords to the assumptions in FVA1.
- 2.8 There are two instances, in relation to brownfield sites (HWH5 and HCM3), where a higher density is applied. This is reflective of the form of development likely on these sites and the indicative capacity in the Local Plan.
- 2.9 CW have submitted a response directly relating to HWH5. They note that for this allocation, a gross to net ratio of 76% is assumed in FVA2. This ratio reflects a reasonable development density for the site at 36 dwellings per net developable hectare. CW say that the constraints of this site are such that even a 60% gross to net assumption is unrealistic and they refer to their client's first representation following the initial local plan consultation. A copy of this representation is contained at Appendix 2 of FVA2. The specific response is from Persimmon and the paragraph references are 8 and 9. Here Persimmon state that the density of the development at HWH5 is set at 31 dwellings per net developable hectare and that the ratio of gross to net site area is lower than 60%.
- 2.10 The Local Plan now identifies a gross site area of 20.95 hectares for HWH5. For the purpose of this example a gross to net ratio of 60% would give rise to a net developable site area of 12.57 hectares. At a density of 31 dwellings per net developable hectare the capacity of this site would be 390 dwellings rather than the indicative capacity in the local plan at 532 dwellings.
- 2.11 FVA2 (paras 7.2.16 - 7.2.19) identifies viability issues with this allocation. If the capacity needs to be reduced from that tested, then this is likely to worsen the viability position. In any event we note at para 7.2.19 that public sector funding support may be required to deliver this site. Furthermore due to the circumstances of this allocation it is expected that a financial viability assessment will be required at planning application stage.
- 2.12 This is a high level assessment based on a reasonable average position in terms of the density and gross to net site area assumptions. There will inevitably be sites that have a higher gross to net site ratio and others where greater site constraints may result in a lower gross to net area ratio. The Council will need to be mindful of this in dealing with any future planning application viability assessments.

Dwelling Mix

2.13 CW support the use of planning application analysis to inform the dwelling mix. They are concerned however that the dwelling mix tested is reflective of the SHMA rather than market evidence of demand. The FVA2 dwelling mix accords to policy H7PU that requires applicants to demonstrate how their proposals meet local housing needs identified in the SHMA and housing needs assessment. We have however prepared further viability testing adopting a housing mix that is more closely aligned to the consented evidence. Details of this mix are contained in table 2.1 and the results of the testing are in Section 5. The mix doesn't contain any one bed dwellings and there is a reduced number of two bed dwellings. The number of four bed dwellings is increased accordingly.

No Beds	1 bed	2 bed	2 bed bungalow	3 bed	4 bed	5 bed
% Mix	0%	15%	5%	40%	35%	5%

Table 2.1: Viability Testing Alternative Dwelling Mix

- 2.14 At the densities tested this alternative mix improves the efficiency of the site coverage with the majority of allocations in the range from 12,900 sq.ft to 15,500 sq.ft per net developable acre. As noted at para 4.4.20 of FVA2 housebuilders will typically target 13,500 to 15,000 sq.ft per acre. This alternative mix therefore produces a reasonable site coverage.
- 2.15 With reference to the comments contained in para 5.11 of the CWR the planning application analysis at Appendix 4 of FVA2 has been revised to include the full address of the site, date of decision and planning application reference. For completeness, given the limited data from Copeland itself, details of three recent planning consents in neighbouring Allerdale where similar market circumstances exist, are included. The applications listed in Allerdale relate to developments by CW's clients, and were subject to a viability assessment. In each case the review was undertaken by KM.
- 2.16 CW suggest that the mix and unit sizes (in terms of the number of beds) be varied in line with the evidence from recently consented schemes in the different market areas. For example they say that the type of scheme and unit sizes delivered in the existing settlements would be different to that in the higher value rural markets. The latter would be characterised by a greater proportion of larger house types.
- 2.17 With reference to Appendix 4 of FVA2 the data shows that a high proportion of large houses are in fact also constructed in the existing settlement areas eg Birks Road, Cleator Moor and Edgehill Park, Whitehaven. Contrary to CWs comments the evidence in Copeland does not support a differentiation in dwelling sizes between rural areas and existing settlements.

- 2.18 Since there is a relationship between dwelling size, value and build costs it is the relative levels of the values and costs that are most important given the high level nature and purpose of the study; rather than necessarily the specific dwelling sizes to which those levels of costs and values are applied. As noted by CW, FVA2 cannot reflect every eventuality and it is not practical to adopt a differentiated housing mix and unit sizes for every site. The key point is to ensure that the density, mix and dwelling sizes adopted produce a reasonable and efficient amount of floor space per net developable acre for each of the allocations.

Sales Values

- 2.19 CW state that the overall average range of values is considered to be broadly reasonable for residential development across Copeland. Notwithstanding this they go on to say that they have identified a number of issues associated with the evidence base which mean that the revenues for certain sites may be overstated, although they do not explain which sites. The points raised by CW and our comments are as follows:

- 2.20 **Land registry data – potential limitations and weight given to this data when informing sales revenues.** Paragraphs 5.2.12 and 5.2.13 of FVA2 refer to the fact that Land Registry house price data provides an understanding of house price trends, and that house price growth has been particularly strong since July 2020. It is also noted that the data shows new house sales represent only 5% of total sales in the Borough. However the best evidence of house prices for the purpose of the study may be derived from recent sales of new dwellings in the Borough. As noted at para 5.2.27 given the limited number of new housing developments, resales evidence from more modern developments is also taken into consideration. Ultimately having evaluated the available house price evidence (both new build and existing stock) we have used our judgement and experience to assess a reasonable range of values against which to test the viability of new housing development in Copeland (para 5.2.34).

- 2.21 The Land Registry data referred to in FVA2 has been provided for illustrative purposes to inform relative house price trends. Weight has not been given to this high level evidence in assessing an appropriate range of values. As with any database the Land Registry average price information will change over time as more sales are recorded and we acknowledge this. Hence the information from Land Registry included in FVA2 was provided to demonstrate relative prices and house price growth trends at the time of writing.

2.22 CW suggest that Land Registry data may not necessarily represent the most appropriate measure for assessing the extent of price growth in every instance. They request that this principle is noted particularly in any future site-specific FVAs where the Council may require that the applicant refers back to / indexes the plan-wide assumptions. Our view is that the Land Registry house price index can be useful in undertaking a high level benchmarking exercise, and is certainly the most widely used and respected data base for this purpose. In the context of any site specific FVAs for development management purposes then if submitted we would expect the information provided to the Council should in any event accord to the requirements of AVIP. In particular with reference to sales values the FVA

"should be informed by evidence of costs and values appropriate to the specific site and scheme. FVA will reflect detail set out in planning application, in terms of size and built form of the proposed scheme. Detailed build cost plan and schedule of value should be provided."
(AVIP table 1)

2.23 This evidence of values would be from the actual site or from comparable developments (AVIP para 4.2.11).

2.24 **Approach to the use of new build and resales evidence.** CW state that the consideration by KM of recent new build evidence and second hand evidence in Copeland is an appropriate approach. In the absence of new build sales evidence they also support KMs approach in analysing modern re-sales in each settlement area to further inform the revenue assumptions.

2.25 CW suggest that new build premiums will in their experience generally range between 10-20% of the average second-hand stock value. Land Registry data specific to Copeland shows that over the period from December 2017 to October 2021 the average price of a new build house in comparison with the average price of a second house was 33.77% more on average, i.e. the average new build premium over the period in Copeland was 33.77%. The data is contained in **Appendix 1** and shows the monthly range in the new build premium is from 29.21% to 38.02%. This data specific to Copeland indicates a relatively consistent level of new build premium which is significantly higher than the 10-20% quoted by CW, albeit less than the average premium across the UK as a whole of 40.2% noted FVA2.

2.26 The table contained at para 5.41 of the CWR shows that in all cases the level of new build premium assumed in FVA2 in comparison with modern resales is generally relatively modest at between -0.5% and 12.24%.

- 2.27 CW make a number of points about the use of resales evidence in FVA2 in particular:
- a) The new build premium adopted for HWH1 is 28.74%.
 - b) There is a lack of consistency in respect of the premium applied and no clear explanation of pricing methodology.
 - c) CW agree that values will vary depending on site-specific location and characteristics however they do not consider that this has been fully accounted for in FVA2 as *"KM have undertaken modern re-sale analysis within settlement areas rather than a focused site specific radius of each allocation."* They say that as a result the revenues may require site-specific review as the values for modern re-sales within each settlement area as a whole, may not reflect the specific value profile of the immediate location of each allocation.
 - d) Although the modern evidence is most useful to inform the assessment of achievable new build values, as KM have elected to undertake site-specific assessments of each allocation and the specific location of each site is therefore known, this enables more focused revenue analysis to be undertaken and more robust revenue assumptions to be formulated.
- 2.28 FVA2 provides at **Appendix 8** a clear explanation of the approach taken to the specific assessment of values for each of the allocations. As noted in Appendix 8, the assessment of values in some cases is based on new build sales prices for example HWH4 and HWH5 and the allocations in Egremont. This is because new build sales evidence is available in the immediate location and is comparable for the purpose of assessing the sales values appropriate to that particular allocation.
- 2.29 Given the limited amount of new build evidence, then in other instances values are based on a modest uplift to modern resales prices in the local area. Contrary to the comments made by CW at point d) above, then as noted at para 5.2.40 of FVA2, the values adopted are reflective of the specific location, characteristics of a site and a focused analysis of values in the immediate area. Appendix 8 of FVA2 contains our comments explaining matters taken into consideration in assessing appropriate values for the particular allocations. This has been updated to include a comment relating to HWH1 which had been omitted from the previous Appendix 8 table.

- 2.30 At point b) above CW suggest that there is a lack of consistency in respect of the new build premium that has been applied. As CW will be aware there is no formulaic approach available to the valuation of the houses to be constructed on the allocations. Given the differences in circumstances for each site we would not expect to see a linear relationship in the level of new build premium as CW are suggesting. This is wrong and a value judgement needs to be made taking into consideration site specific circumstances. As explained in Appendix 8 matters such as outlook, neighbouring uses and the access and approach to the site have been taken into consideration. These factors will all give rise to adjustments in values. This is an entirely reasonable approach in establishing values.
- 2.31 CW are critical of the analysis of resales that have been undertaken by settlement area saying instead that this should focus on a site specific radius of each allocation. CW will doubtless be aware that outside of Whitehaven, the allocations are situated in smaller towns and villages. It is therefore entirely appropriate to consider all modern re-sales in these towns and villages. By virtue of the settlement size, these sales are actually within a focused radius of the relevant allocations in any event. With reference to the resales evidence at Appendix 6 of FVA2 examples include:
- i. HMI1/2 - sales around the Lowther Road estate which neighbours HMI2 and is within 0.25km of HMI1.
 - ii. HEG2/3 – sales around Ling Road/Ashley Way estate and Dale View Gardens which directly border these allocations.
 - iii. HCM1/HCM2 – sales around Coniston Park and Threaplands estates which are either directly adjacent to or within 0.2km of the allocations.
 - iv. HSE2/3 – sales around Links Crescent and the Fairways which are earlier phases of HSE2 and directly adjacent to HSE3.
 - v. HSB3 – sales at Fairladies which is directly adjacent to HSB3.
- 2.32 In the villages and local service centre of Thornhill, there were few modern resales hence the information contained at **Appendix 6** of FVA2 includes an analysis of all sales.
- 2.33 **Non-cash incentives and extras** – FVA2 notes that non-cash incentives are generally limited at the present time. CW suggest that their experience is that incentives are at 2-5%. We have requested details of the actual amount of incentives offered by CWs clients at the 3 developments that they are presently undertaking in the Borough. They have not however been able to provide details of the average level of incentive offered across these schemes.

- 2.34 In dealing with CW elsewhere in relation to viability matters they have also referred to this level of discount at 2-5%, however subsequent evidence has shown the ultimate level of incentive to be less, and the range suggested by CW to be overstated. The lack of new build sales in Copeland means that the sales price assessments are in most cases actually based on resales evidence rather than new build in any event.
- 2.35 **Affordable housing transfer values** – CW are content that the value adopted for the affordable rented units at 45% of market value is reasonable. In the absence of comments to the contrary it is also assumed that for First Homes 70% of market value is reasonable. They do however suggest that a transfer value at 70% of market value is overstated for shared ownership although no alternative valuation is provided.
- 2.36 Within Copeland and neighbouring Allerdale, our experience is that shared ownership dwellings are rarely sought through a S106 Agreement, with the Councils typically securing discount to market value properties. As a result as CW acknowledge there is limited evidence of affordable housing transfer values. Three Registered Providers (RPSs) active in the area formed part of the original consultation regarding FVA2 in October 2021. None raised any concerns about the transfer values that we proposed to adopt for the affordable home ownership dwellings at 70% of market value.
- 2.37 KM prepared the Rossendale LPVA and St Helens LPVAs, both recently subject to examination and found sound. In each case the LPVAs assumed a transfer value for affordable home ownership units at 70% of market value.
- 2.38 CW provide no evidence relating to Copeland to support their comments. In the circumstances alternative transfer values have not been justified, and as no issues were raised by the consultee RPs we see no reason to make any adjustment to the assumption.

Construction Costs

Data Base

- 2.39 CW suggest that the FVA2 does not follow standard industry practice for plan wide viability testing by using BCIS. CW also state that in their experience of reviewing area wide and site specific FVAs, the base construction costs are typically derived from BCIS data.

- 2.40 We disagree. CW will be well aware of the limitations of the use of BCIS average price data and these limitations are set out at paras 2.1 – 2.11 of the Construction Costs Report at **Appendix 11** of FVA2. We do not propose to repeat these points here. The limitations of BCIS as a data source are recognised by the RICS, and AVIP (para 4.2.14) states that *"Wherever possible, cost estimates should be based on market evidence from similar developments."* AVIP then goes on to say that *"BCIS and other indices are 'appropriate' but are not always reflective of local market conditions."* As a result, AVIP (para 4.2.18) concludes that *"BCIS can be used if appropriate, but supporting evidence of costs and duration in the local market should be used where available."*
- 2.41 It is not therefore standard industry practice to use BCIS for a study such as this. In the absence of local market evidence BCIS can be used as an alternative but is not to be used in preference to local market evidence. The use of KM's data base which contains local market evidence from within Cumbria and across the north of the England is therefore to be preferred to the use of BCIS average price data and accords fully to the requirements of AVIP.
- 2.42 CW also state that site specific FVAs are typically derived from BCIS data. It is assumed that the reference here is to BCIS average price data. It is not our experience that this is typically the case and, in any event, going forward it is a requirement for RICS members in AVIP (para 4.2.15) to provide a full quantity surveyor's cost report showing how costs have been estimated. Elsewhere in AVIP table 1.2.13 refers to a detailed build cost plan being provided in support of any site specific FVA.
- 2.43 The KM data base has been fully interrogated as part of recent Local Plan Examinations under the NPPF (2019). CW themselves have considered the content of the data base and made representations accordingly as part of the St Helens Local Plan Examination. Reference is made to the content of these representations at paras 5.98 – 5.105 of the CW response. The Inspectors in providing their report into the soundness of the St Helens Local Plan and associated evidence base will have taken into consideration all representations received including those from CW in relation to the database. Having done so the Inspectors report which was issued on 18 May 2022 concludes that:

"The EVA is considered to be, overall, realistic, robust, and proportionate, applying existing use values, sales values, interest rates, construction costs and developer profits, in accordance with PPG and local evidence. Developer profit of 20% for larger developments is particularly robust given that the PPG suggests between 15-20% should be considered a suitable return. The EVA Update Note (SHBC027), provided after the hearings, included a proportionate response to some of the viability evidence, as well as testing of different scenarios." (para 303)

- 2.44 The construction costs, and by implication the use of the data base, were therefore considered to be realistic, robust and proportionate and in accordance with the PPG and local evidence. There is no reason to depart from the use of the construction cost data base for the purpose of assessing the construction costs used in FVA2.
- 2.45 Similarly, the Inspector’s Report in relation to the Rossendale Local Plan which was issued 19 November 2021, concluded that:
- “The Council’s viability assessment robustly demonstrates based on reasonable and available information that the cumulative impact of the policies in the Plan will not compromise development viability. The Council’s approach is consistent with the advice contained in the Viability PPG.” (para 344)*
- 2.46 KM also prepared this Local Plan Viability Assessment using the construction cost data base and the approach was considered to be robust and consistent with the advice contained in the Viability PPG. With reference to para 1.3.3 of FVA2, the 15 Local Plan Viability Assessments listed have all been prepared using the construction cost data base not BCIS average prices. In all cases the local plans have been found sound. The respective Inspectors have raised no issues with the approach to the assessment of construction costs. In those instances where the examination report has made reference to the viability assessment it is typically in the context of the robustness of the study and assumptions.
- 2.47 As well as St Helens and Rossendale, the Local Plans for Liverpool and Hambleton have also recently been found sound following Viability Assessments prepared by KM.
- 2.48 The CWR (para 5.89-5.91) refers to research undertaken by the Planning Consultancy Lichfields. In particular the approach taken to the assessment of build costs for Local Plan and CIL Viability Assessments. This research notes that BCIS is commonly used in such assessments but it does recognise that alternative approaches can be applied.
- 2.49 With reference to this research CW quote Lichfields in stating that in the context of the Local Plan Viability Assessment for Barrow, KM are the only consultant who depart from the use of BCIS.
- 2.50 The Lichfields research considers all CIL viability assessments for charging schedules adopted between January 2016 and March 2020, and all Local Plan Viability Assessments for Local Plans adopted between January 2018 and March 2020. Having considered the map of Local Authorities identified in the report we would question the robustness of the Lichfields research and the voracity of their conclusions in relation to the use of BCIS. In particular we have concerns about their research in terms of the approach to construction costs which in turn leads us to question CWs wider understanding of the report.

- 2.51 Firstly with reference to the Local Authorities identified we are aware of one Local Authority that has been omitted having adopted a local plan during the period stated. In this particular case KM produced the Local Plan Viability Assessment. For the purpose of this exercise, we have not cross checked all Local Authorities however the existence of this omission leads us to conclude there may be others that have been excluded from the analysis.
- 2.52 Secondly Lichfields say that based on their research it is only the LPVA for Barrow that does not adopt BCIS to assess build costs. With reference to the map of Local Authorities considered as part of the research this is clearly wrong. There are certainly a number of other local authorities identified in the research where KM have prepared local plan viability assessments including those for Fylde, Wyre and Cheshire West and Chester. These assessments were all prepared using our data base of local market construction costs and have been found sound. These FVAs must have been analysed by Lichfields however they presumably have incorrectly been included in the Lichfield’s total for FVAs based on BCIS.

Table 6.5

- 2.53 CW refer to table 6.5 of FVA2 and request that the total standard build costs are specified. This information is actually already provided in full at Appendix A of the Construction Costs Report. With reference to Appendix A, the table on page 2 provides full details of the base build costs, whilst the table on page 9 contains details of the total for each cost heading to enable full interrogation. The total gross internal floor areas for each scheme are also included on page 6 to enable any further cross checks that may be required.
- 2.54 For ease of reference, we have however reproduced the respective tables to assist CW and included them as tables 6.9 and 6.10 in the final version of FVA2. There are two sets of tables one showing the actual totals and the other showing the respective total measured either in £ sq.m, as a percentage or a rate per unit in accordance with normal market practice. The table on page 8 of Appendix A provides a more detailed breakdown of the external works costs across site clearance, fencing, driveways, paving, gardens, plot services, road and drainage.
- 2.55 CW incorrectly state that professional fees are applied to base build costs only (para 5.133). The professional fees scales have been applied to the base build cost including prelims, all external works costs, garages and part L. In addition the CW statement regarding contingencies being applied to the base build cost only (para 5.136) is also wrong. The 5% contingency allowance is applied to the base build cost including prelims, all external works costs, garages, part L costs and professional fees.

- 2.56 CW have recently prepared the viability assessment to support the Local Plan for Warrington. Within that document they acknowledge *"that the calculation of standard build costs is sometimes built up without reference to the BCIS, through the base house box cost, plus plot external works, plus half standard estate roads and sewers, plus plot connections."* (para 7.209).
- 2.57 At para 7.210 of this report they go on to say that *"it is the total 'all in' standard build cost figure which is relevant rather than the precise methodology, and it is the 'all in' standard cost figure which must be sufficient to deliver the definition at paragraph 7.187"* ie the normal cost of the dwelling plus preliminaries, garages and external works.

Garages

- 2.58 CW seek clarification as to the number of detached houses contained in each typology and with reference to this the number of garages assumed. They also require details of the garage cost assumptions and refer to the scale reductions that have been made.
- 2.59 With reference to these points the number of detached units contained in each typology is in fact shown on page 1 of the tables at Appendix A of the Construction Costs report. In respect of adjustments made for scale. Economies of scale applies to all component costs of a build and garages being an integral part of the build cost will be subject to the same overall impact. Our schedule of typical garage cost rates varies depending on whether the garage is a single or double and then varied further based on whether the garage is integral, attached or detached. In this instance an allowance has been made for single integral garages for the 3 bed dwellings at a base rate of £4,910/unit, for single detached garages for the 4 bed detached dwellings at a base rate of £9,421/unit and for the 5 bed detached dwellings at a base rate of £14,741/unit.

Plot Service Connections

- 2.60 The table on page 8 of the Construction Costs Report (Appendix A) contains details of the total costs included for plot service connections for each allocation. The total number of dwellings contained in each allocation is noted in the table at page 1 of Appendix A. Contrary to the comments from CW the assumption is not unknown and with this information the cost per plot can be calculated. To assist CW the plot services equate to £4,704 per dwelling.

Terminology

- 2.61 CW seek clarity regarding some of the terminology adopted in the Construction Costs Report. To assist CW we can confirm that the base build costs referred to in the table on page 9 of Appendix A, are inclusive of garages and part L costs but before the addition of preliminaries, external works and oncosts, POS or Abnormals. Contrary to the CW comments (para 5.118) there is transparency as the Base “Box” costs are stated in the table on page 2, the garage costs in the table on page 4 and part L costs in the table on page 5. For the avoidance of doubt in the final version of FVA2 the respective columns in the table on page 9 have been included to show the component elements that make up the Base Build Costs.
- 2.62 Oncosts only refer to professional fees and contingencies. External works and preliminaries are not considered as oncosts. External Works and preliminaries are added to the base build costs (which is the Base Box Cost plus garages plus part L) to form the Total Build Costs. Professional Fees are calculated against the Total Build Costs and contingency calculated against Total Build Costs plus Professional Fees.

BCIS Comparison

- 2.63 CW state that application of significant discounts to BCIS figures is not regarded as appropriate for the purpose of cross-checking build costs in plan making.
- 2.64 It is common practice when using BCIS Average Prices to benchmark costs, to discount the rates derived from the BCIS Database. The data from which BCIS generates the guide average prices is derived predominantly from contractors for smaller schemes often constructed on behalf of Registered Providers. Therefore, the costs do not reflect the economies of scale which can be achieved by established regional and national housebuilders. In addition, the BCIS costs include a contribution for main contractor’s overheads and profit. This is a cost not usually incurred by established housebuilders as they typically carry out the main contractor’s function internally. BCIS data also carries a health warning due to the size of dataset, relevance to the region and the lack of transparency of schemes in terms of how applicable they are in scope to the size and type of market development likely to take place here.
- 2.65 BCIS publish scale factors that represent cost variance with development size, with larger developments benefiting from economies of scale and hence pro-rata being more cost effective to develop. Details of the impact that scale can have on a development are shown below in figure 2.1:



Economies of scale

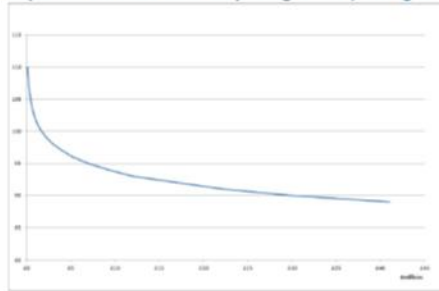
Pricing levels on building contracts tend to fall as the size of the project increases.

25-Oct-2016

The latest BCIS Tender Price Study, based on project tender price indices analysed by contract sum, shows that pricing levels fall by as much as 20% between small contracts and multi-million pound schemes.

Compared to the mean value of projects in the study of £1.7million projects, pricing on small projects is 10% higher, while pricing on projects over £40million can be 10% lower.

Impact of contract value on pricing levels (Pricing level – log of project indices, BCIS Tender Price Study, Base £1.7million = 100)



Source: BCIS

The graph shows a clear relationship, with larger contracts having a lower price level than smaller contracts - as would be expected from economies of scale. In reality the project cost varies for many reasons and the relationship is not clear until a large sample of schemes is analysed.

It is not clear that the relationship continues at either end of the scale. There is an insufficient sample of large projects to tell whether larger projects continue to gain from economies of scale with ever falling price levels; maintain similar pricing levels (prices 'level out'); or whether pricing levels rise because of additional complexity. However, the indications are that the average price level of larger projects does not fall significantly beyond about £40million while the smallest projects appear to be more variable (and therefore break the homogeneous assumption underlying the analysis).

The Contract Sum study is intended to measure the effect of contract size on price level. The contract sum was chosen rather than the floor area because it is always available from the BCIS indexing process and is a better measure of the total 'volume' of building work as it includes external works, etc.

The price level of individual building projects varies widely for all sorts of reasons. The BCIS Tender Price Studies show how, on average, price levels change relative to ten variables. There are many more variables that will affect the price level of a building project and so professional judgment should always be used when applying the study results.

1. Date – when it was built
2. Location – where it was built
3. Regional trend – interaction between where and when it was built
4. Selection of contractor competitive tender, negotiated, etc.
5. Contract sum – volume of work *
6. Building function – office, factory, hospital, etc.
7. Building height – number of storeys
8. Type of work – new build, refurbishment, etc.
9. Site working space
10. Site access

* Note: the volume of work affects the cost of a building directly but it also has an effect on the price levels of the work.

The Contract Sum study is based on a least squares linear regression with the natural logarithm of the adjusted project index as the dependant variable and the logarithm (base 10) of the contract sum (adjusted to 1985 prices) as the independent variable.

Figure 2.1: BCIS Economies of Scale Adjustments

- 2.66 This shows the range of index change with contract size and is readily available from the BCIS website. With reference to this data the reduction shown for a contract of £40m (approx. 300 dwellings) is 10% lower than the mean value and the addition for projects at the smaller end of the scale is 10% higher. Overall indicating a fall of 20% between small contracts and multi-million pound schemes. KM's scale adjustments used in its own dataset are more conservative than the BCIS study with a reduction overall of only 12.5% for the larger projects (in excess of 250 dwellings), 2.5% of which reduction only impacting developments of less than 10 dwellings. In addition, KM's database is essentially constructed utilising data for projects typically within the range of 25 to 100 dwellings, hence the reasons for adjustments made above and below that size of development.
- 2.67 It is for these reasons that it is generally accepted by developers, contractors and their advisers that the data should be "normalised" before being utilised as a benchmark. The discount applied by KM for the double counting of Main Contractor's overheads and profit is 10% and no further discount has been applied to reflect the economies of scale secured for larger projects relative to the typical scheme size within the BCIS database of less than 50 units. This conservative judgement is made on the basis that scale reductions within the Copeland Borough are more difficult to secure than in other regions within the North-West of England.
- 2.68 KM's extensive experience in the reviewing of Financial Viability Assessments clearly evidences the above adopted principle. In fact, in reviewing FVAs that have been prepared by CW they clearly refer to the need to discount BCIS average rates albeit there is inconsistency in their approach, as they have applied total discounts ranging from 12.5%, 20% through to 25%. Extracts from a sample of CW FVA's are provided below.

Cushman & Wakefield Date: June 2020

Financial Viability Assessment Financial Viability Assessment of: Land at Moss Nook, Watery Lane, St Helens, WA9 3EN

- The BCIS figures are inclusive of the base house build cost, preliminary costs and a main contractor's overheads and profit but are exclusive of plot external works, garages, standard estate roads, sewers, plot service connection costs, contingencies and professional fees. These costs must therefore be added to the base build costs to determine the total standard build costs for the subject development.
- We note that the BCIS data is predominantly based on build contracts submitted by contractors for smaller schemes often constructed on behalf of Registered Providers. As such, the costs do not always reflect the economies of scale which can be achieved by established regional and national housebuilders on larger sites through supply chain efficiencies.
- The BCIS costs also include a main contractor's profit and based on our experience in dialogue with housebuilders and expert quantity surveyors, this cost is not usually incurred by established housebuilders as they typically carry out the main contractor's function internally.
- Accordingly, when utilising the BCIS to assess base build costs for medium and large sized developments which would be delivered by established housebuilders, it has been found necessary to adjust the BCIS figures using our extensive market experience in order to reflect a market-facing position.
- We have reviewed the Median cost for general estate housing rebased to the St Helens location index which equates to £1,180 psm / £109.62 psf as at the date of this FVA. **We have adjusted the BCIS figure down by 25% to remove the embedded contractor's profit and to reflect potential economies of scale on a site of this size.** We have rounded the adjusted figure to the nearest whole number. On this basis, our assessment of the base build cost equates to £87.00 psf for the housing units.

Cushman & Wakefield Date: August 2020

Financial Viability Assessment: Financial Viability Assessment of: Land at New Warrington Road, Wincham

- 7.26. The BCIS has further advised that in some instances, the data will need to be adjusted to account for the effect of COVID-19 on build costs. According to the BCIS Note entitled "Adjusting BCIS data for the effects of COVID-19", the lockdown has had three potential affects:
- Productivity: changes in productivity resulting from the implementation of site operating procedures (SOP);
 - Preliminaries: lengthening due to extended contract period and thickening due to increased cost of supervision for SOP, increased welfare, PPE, etc; and
 - Market conditions: reduced demand, reduced availability of resources, and increased overheads.
- 7.27. For the above reasons, the current BCIS data may not be reliable or truly reflective of the base build costs including preliminaries being incurred by developers as at the date of this FVA. We have therefore relied on the BCIS costs immediately prior to the outbreak of COVID-19 for the purposes of our appraisal.

- 7.28. In adopting this approach, we are waiving any potential cost increases since March 2020 both due to general build cost inflation since this date and the effects of COVID-19 on build costs as highlighted by the BCIS. We recommend that the cost assumptions (as well as the value assumptions) are kept under review over the coming weeks and months as the situation with regards to the COVID-19 pandemic develops further.
- 7.29. We have reviewed the Median cost for general estate housing rebased to the Vale Royal location which equates to £1,160 psm / £107.77 psf. **We have adjusted the BCIS figure down by 20% to remove the embedded contractor's profit and to reflect potential economies of scale on a site of this size.** We have rounded the adjusted figure to the nearest whole number. On this basis, our assessment of the base build cost equates to £90 psf for the housing units.

Cushman & Wakefield Date: February 2021

Financial Viability Assessment Financial Viability Assessment of: Land at Lowmoor Road, Wigton, Allerdale

- In the absence of provided base build costs from a quantity surveyor, we therefore consider that the BCIS represents a reliable industry-wide source to inform our assessment of the likely base build costs for developments of this nature.
- We have considered the BCIS cost data from the most recent 5 year 'age of results' sample rather than the BCIS default data which is based on a 15 year sample. This is to ensure that the build costs are based on the most recent data and are therefore more reflective of the current market and specifications.
- This approach is consistent with the recent appeal decision in respect of Land next to School Lane, Milford on Sea, Lymington (reference: APP/B1740/W/18/3209706, decision date April 2019) where the Inspector favoured the use of the BCIS 5 year data rather than the BCIS default 15 year data. The Inspector provided clear reasoning to support his decision at Paragraph 17.
- The BCIS figures are inclusive of the base house build cost, preliminary costs and a main contractor's overheads and profit but are exclusive of plot external works, garages, standard estate roads, sewers, plot service connection costs, contingencies and professional fees. These costs must therefore be added to the base build costs to determine the total standard build costs for the subject development.
- We note that the BCIS data is predominantly based on build contracts submitted by contractors for smaller schemes often constructed on behalf of RPs. As such, the costs do not always reflect the economies of scale which can be achieved by established regional and national housebuilders on medium and larger sized sites through supply chain efficiencies.
- The BCIS costs also include a main contractor's profit and, based on our experience in dialogue with housebuilders and expert quantity surveyors, this cost is not usually incurred by established housebuilders as they typically carry out the main contractor's function internally.
- Accordingly, when utilising the BCIS to assess base build costs for medium and large sized developments which would be delivered by established housebuilders, it has been found necessary to adjust the BCIS figures using our extensive market experience in order to reflect a market-facing position.
- For the purposes of our appraisal, we have reviewed the BCIS Lower Quartile cost for two storey estate housing rebased to the Allerdale location index which equates to £1,074 psm / £99.78 psf as at the date of this FVA.

- We have adjusted the BCIS figure down by 7.5% to remove the embedded contractor's profit. We have reduced the figure by a further 5% to reflect potential economies of scale on a site of this size. We have rounded the adjusted figure to the nearest whole number. On this basis, our assessment of the base build cost equates to £88 psf for the housing units.
- 2.69 The benchmarking exercise contained in the Construction Costs report has been re-presented to exclude within the Base Build cost any cost associated with garages and part L. The updated table is contained on page 13 of Appendix A in the final version of the Construction Costs Report and the narrative at para 2.48 has been updated accordingly. The updated Construction Costs report at Appendix B also includes the BCIS average prices for Copeland. (As noted by CCC the draft version included in error a copy of the rates for Blackburn, although the benchmarking exercise did nevertheless adopt the rates for Copeland).
- 2.70 KM have adopted the BCIS Lower Quartile rates to benchmark the costs for the FVA2. After a deduction of 10% for Main Contractor's overheads and profit the exercise concludes that KM's costs are on average 1.2% above the discounted BCIS rates. Putting it another way KM's costs are on average 8.8% below the raw data of the BCIS rates. This being less than CWs most conservative approach to utilising BCIS data (i.e., adopting a 12.5% discount applied to the Lower Quartile rates).
- 2.71 CW in their response, note that for larger sites it is a common approach to use lower quartile rates however if adopted this shouldn't be further adjusted for profit and scale. We disagree with this point and in any event have noted earlier in this response that this is the approach taken by CW themselves in preparing the last of the three FVAs noted above.
- 2.72 CCC in their response state that the base build costs in the Construction Costs Report are typically higher than the BCIS median rates and the build costs assumptions are higher than for any other FVA. The re-presented benchmarking exercise in the Construction Costs Report demonstrates that the construction costs adopted are typically in line with BCIS lower quartile rather than median prices. CCC also note the relatively small "economy of scale" discount applied to larger sites (100+ units) at 3 to 5% (in comparison with the discounts identified by BCIS). As noted in para 2.66 KM's database is essentially constructed utilising data for projects typically within the range of 25 to 100 dwellings, hence the reasons for adjustments made above and below that size of development. In addition a more conservative judgement is made as to scale reductions within the Copeland Borough as they are likely to be more difficult to secure than in other regions within the North-West of England.

Professional Fees

- 2.73 As noted previously CW incorrectly state that professional fees are applied to base build costs only. In addition contrary to CW's comments adopting a sliding scale of fees to reflect economies of scale for the size of the project is a well-established practice amongst professional consultants. The effect is negligible in the exercise that KM undertook but it does represent a realistic model adopting this approach.
- 2.74 Table 6.10 of FVA2 contains details of the fee scales as a percentage of these totals. CW suggest use of a minimum 7% allowance, the table shows that save for the two largest allocations tested, in all other cases the professional fees are in fact at or in excess of 7%. The quantum of professional fees included in the assessments is considered to be particularly robust for the purpose of the viability testing.

Contingencies

- 2.75 Again, the CW statement here is not correct. The 5% allowance for contingencies is applied to the base build cost including prelims, all external works costs, garages, part L costs and professional fees.

Abnormal Costs

- 2.76 The main points raised by CW here are that a provisional allowance of £15,000 per plot should be applied to all strategic sites at plan making stage subject to the addition of fees and contingency. They go on to say that the larger more strategic sites will need to be the subject of more fined grained analysis with appropriate allowances made based on known information at this stage of the process. CW also state that whilst we have adopted reasonable provisional sums for some allocations, the allowances for many typologies are still regarded as too low with 17 of the 30 typologies having abnormal costs of circa £9,000 per plot or less.
- 2.77 To support their comments CW refer to their internal data base of abnormal costs which is at Appendix 7 of their response. CW state that this data shows a range of abnormal costs per plot from £8,000 to £52,000 per plot with an overall average of £22,000 per plot. We have considered the data provided by CW at Appendix 7 and have noted that the lowest cost per plot is in fact £7,000 for a development of 140 units in Blackburn.

- 2.78 The highest figure in the range is stated as being £52,000 per plot and the abnormal cost per net developable acre for this entry is £315,000. This means that this particular scheme only delivered 6 dwellings per acre. This appears to be anomalous and would equate to a density of only 15 dwellings per hectare. The remaining schemes in the sample provided by CW provide on average 15 dwellings per net acre. We would question the analysis provided by CW of this particular scheme and have therefore discounted it.
- 2.79 The abnormal cost information provided by CW therefore shows a range of £7,000 to £36,000 per plot.
- 2.80 With reference to the comments made by CW we have a number of observations.
- 2.81 There is no clear definition of what is included in the examples of abnormal totals per plot provided by CW to ensure comparability with the assumptions in FVA2. It is noted at para 5.107 of the CW response that they consider POS / play provision to be a site-specific abnormal cost. In the Warrington LPVA for the viability testing of generic typologies CW have included an amount of £16,850 per dwelling for abnormal/extra over costs on both brownfield and greenfield sites, this is stated to cover items such as:
1. Cut and Fill
 2. Retaining Walls
 3. Abnormal Foundations
 4. Surface Water Attenuation
 5. Sustainable Urban Drainage Systems
 6. Pumping Stations
 7. Sub Stations
 8. Ecological Mitigation
 9. On-site Public Open Space (Including Play Provision)
 10. Enhanced Elevational Treatments (required under planning permission)
 11. Electric Vehicle Charging Points
- 2.82 CW state that the list is not exhaustive and represents an example of some of the potential abnormal and extra over development costs which could be incurred on residential development sites.
- 2.83 With reference to this list of 11 items it is evident that a number of cost heads are already included and costed separately elsewhere in the construction cost assessments for FVA2. Hence in commenting on the abnormal cost allowances, CW are not comparing like with like. For example, the onsite open space (including play provision) and electric charging points are considered by CW to be abnormal costs. KM have costed these items separately to abnormal costs and the range of costs per dwelling for each allocation can be seen at table 6.10 of FVA2.

- 2.84 If the allowances in FVA2 for POS and EVCs are added to the abnormal costs to enable a like for like comparison with the CW approach, then the overall total abnormal costs increase significantly. The range of “total abnormal costs” is from £9,823 to £33,196 per dwelling with an average of £16,662 per dwelling. This is consistent with the range contained in the CW data base at £7,000 to £36,000 per dwelling. In many cases the total allowance is in excess of the recommendation made by CW of £15,000 plus fees and contingency. Contrary to the comments made by CW, on a like for like basis, the total abnormal costs per plot exceed £9,000 in all cases once costs associated with POS and EVCs are taken into consideration.
- 2.85 CW suggest that for the larger, more strategic sites a more fine-grained analysis should be undertaken with appropriate allowances made based on known information at this stage of the process. This is exactly the approach that KM have taken in assessing all of the allocations tested. As noted at para 2.39 of the Construction Costs Report the assessment of abnormal development costs is based on known information taken from the Housing Allocation Profiles, the Transport Improvements Study and the Site Access Assessment. The allowances have been informed by a site visit to understand the topography and constraints of each allocation and the assessment is also informed by officer knowledge of the respective sites.
- 2.86 The research by Lichfields provided at Appendix 6 of the CW response considers the inclusion of abnormal and site opening up costs in area wide viability assessments. In relation to abnormal costs it states that 61% of the studies considered (57/93) did not apply an allowance for abnormal costs. Two thirds of the studies that did apply an allowance for abnormal costs adopted a brownfield only approach with no allowance for greenfield sites at all. Only 12 out of 93 studies included an allowance for greenfield abnormal costs. Justification for the exclusion of abnormal costs in these studies included the site-specific nature of such costs and the fact that they should be factored into the land value. Lichfields note that 58% of assessments did not include any allowances for opening up costs.
- 2.87 In contrast to the majority of LPVAs that Lichfields have analysed, those KM have previously prepared have included allowances for abnormal costs/opening up costs.
- 2.88 The research by Lichfields related to Viability Assessments prepared for Local Plans and CIL charging schedules adopted before April 2020. We have analysed Local Plan Viability Assessments for those plans either adopted or published since this date. We have specifically considered the approach taken to abnormal/site opening costs and the interaction with land value. From this analysis we have considered the approach taken in the North and Midlands, excluding the area wide FVAs prepared by KM during this period for the following:
- Hambleton District Council (Local Plan)
 - Liverpool City Council (Local Plan)
 - Rossendale Borough Council (Local Plan)
 - Staffordshire Moorlands District Council (Local Plan)
 - Mansfield District Council (Local Plan)
 - St Helens Metropolitan Borough Council (Local Plan)

- 2.89 This analysis shows that in those cases where abnormal costs are included, the respective FVAs take differing approaches. Some are based on a rate per unit, others a percentage of build costs and some adopt an amount per acre. The amount of abnormal/infrastructure costs in some cases differs based on the size of the typology with larger sites having a greater abnormal cost assumption per dwelling. A number of the FVAs analysed also refer to the point made at para 2.5 of the Construction Costs Report, that BCIS costs do allow for a level of abnormal costs (or at the very least the data is not transparent enough to trace what element of Abnormal costs have been included) as such abnormal costs are often encountered on sites that form the basis of the BCIS data sample. As a result, in some cases where BCIS average rates have been adopted in LPVAs to assess the build costs, then no abnormal costs are included to avoid any double counting.
- 2.90 In considering the approach taken to abnormal development costs/opening up costs we have taken the assumptions made in the respective recent FVAs and prepared the tables contained at **Appendix 2** for greenfield and brownfield sites. The tables show details of resultant cost per dwelling across the greenfield and brownfield typologies and at the differing densities. In those instances where Local Plans have not yet been adopted the entries are highlighted.
- 2.91 The PPG is clear that the level of abnormal costs must be reflected in the BLV normally through a reduction in the premium uplift. As abnormal costs increase so the premium should reduce, with the cost burden in relation to abnormal costs being largely borne by the landowner rather than by the Local Planning Authority through a loss of planning gain. A reasonable balance therefore needs to be struck between the level of abnormal costs assumed and the BLV.
- 2.92 The first table in **Appendix 2** contains the information relating to greenfield sites. Of the 26 FVAs analysed, 13 make no allowances whatsoever for abnormal costs on greenfield sites. In these assessments it is normally suggested that the land value would need to be reduced to reflect any abnormal costs. Furthermore, in some cases where BCIS average rates are used to assess the construction costs, it is noted that BCIS average rates already include an element of abnormal costs so to include further costs would be double counting.
- 2.93 Of the remaining FVAs that do include an allowance for abnormal costs/site infrastructure, four include an allowance of less than £5,000 per dwelling, a further four contain an allowance in the range of £5,000- £10,000 per dwelling, whilst only one has an overall allowance at more than £10,000 per dwelling. This was the CW LPVA for Warrington. It is acknowledged that a further four of the LPVAs adopted higher rates for strategic sites, ranging from £12,500 to £26,000 per dwelling.
- 2.94 In comparison the total abnormal cost allowances in FVA2 for greenfield sites (including POS and EVCs), equate to approximately £10,000 to £32,500 per dwelling. With reference to the approach in other LPVAs, these allowances are generous and are already comparatively high. They certainly do not warrant any further increase.

- 2.95 The second table in **Appendix 2** contains the relevant information in relation to brownfield abnormal costs. This has also been analysed up to a higher density of 40 dwellings per hectare to reflect the testing undertaken for HCM3 at 38 dwellings per hectare. The information shows that of the Local Plan FVAs analysed only three of the assessments did not include any abnormal costs for brownfield typologies. Ten of the FVAs adopted an abnormal cost allowance of around £5,000 per plot or less and a further five were in the range of £5,000 to £10,000 per plot. Four of the studies adopted an abnormal cost allowance in excess of £10,000 per plot including the FVA prepared by CW for Warrington. A further four FVAs adopted varying rates for abnormal costs principally for the strategic sites.
- 2.96 For brownfield sites (including the costs of POS and EVCs) FVA2 includes abnormal allowances from £10,200 up to £33,200 per dwelling. Again a comparison with the other LPVAs analysed demonstrates that these assumptions are generous for the purpose of a LPVA assessment.
- 2.97 We have considered the comments made by CW about the abnormal cost assumptions contained in FVA2. We have also had regard to the approach taken to abnormal development costs in other recent LPVAs in the North and Midlands. Having reflected on all of this information we are content that the approach to abnormal costs and the assumptions made in FVA2 are robust and reasonable based on known information at the present time. No changes are therefore required to the abnormal development costs included in the FVA2 viability testing.
- 2.98 There are clearly differences in approach between KM and CW in assessing the construction related costs appropriate to a high-level viability assessment such as this. Our assessment of these costs is based on the established assumptions and data that has been used by us in preparing Local Plan Viability Studies elsewhere that have been found sound under the current NPPF and PPG and prior to that NPPF 2012. There are also apparent differences between us in terms of the items that are included under the heading of abnormal costs. The provision of public open space, on site play and EVCs have been costed separately by us whilst CW appear to include these costs as abnormal items. Overall the construction related costs contained in FVA2 are robust, particularly so in relation to abnormal costs, and are reasonable for the purpose of a high-level assessment such as this.

Future Homes/Part L

- 2.99 CW consider the costs contained in the Construction Costs Report for Part L requirements to be fair and reasonable. For the avoidance of doubt Future Homes requirements were not tested due to the CW acknowledged uncertainty as to likely requirements and ultimate costs of implementation.

Vehicle charging points

- 2.100 CW suggest that the allowance in FVA2 at £581 per unit may be slightly low and an allowance of £600-£750 may be more reflective of costs in Copeland. We do not agree because it is nominal average allowance across all developments regardless of size. Scale will play a part in reducing the unitary cost. However this slight difference in cost is not material to the outcome of the assessment. It is acknowledged in the Construction Costs Report that no allowance is made for any infrastructure costs that may in the future be needed if chargers are used on a large scale. The Council will need to be mindful of this point if network reinforcements are required to facilitate future developments.

S106 Contributions

- 2.101 Both CW and CCC make various comments in relation to the inclusion of S106 contributions. Section 4 of this Addendum Report contains an update as to the present position in terms of developer contributions and addresses the comments made by CW and CCC as appropriate.

Developers Profit

- 2.102 The response provided by CW disagrees with the assumption of a profit based on 18% of GDV for the market dwellings contained in the allocations tested. This is notwithstanding the fact that a profit at 18% of GDV is well with the range noted in the PPG at 15-20% of GDV. CW also go on to say that a single plan wide profit assumption may not reflect the required return on all sites, and different profits may be applicable for certain sites in Copeland.
- 2.103 CW in their response refer to 35 studies that they have reviewed over the period June 2017 to August 2021. They state that 29 of these studies adopt a profit at 20% of GDV for the market housing. Presumably the remaining studies do in fact adopt a profit of less than 20% of GDV.

- 2.104 We have analysed Local Plan Viability Assessments prepared across the North and Midlands (other than by KM) post those considered in the Lichfields research. Of these studies 16 adopt a profit at 20% of GDV for the market housing, one adopts a profit at 18% of GDV and 7 adopt a profit of 17.5% of GDV for the market housing alone or blended across the market and affordable dwellings. The remaining assessments adopt a range of profits from 15% to 20% of GDV.
- 2.105 CW at para 5.184 refer to pertinent examples in the North West and then refer to a series of area wide viability assessments prepared by KM. Other area wide assessments have in fact been prepared for Authorities in the North West over this period by practices other than KM, and some of these area wide assessment adopt a profit for market dwellings at less than 20% of GDV. These include for example in relation to Lancaster and Cheshire East.
- 2.106 With reference to the table of North West LPVAs in the CWR, we have acknowledged at paragraph 6.3.45 of FVA2 the previous use by KM of a 20% target profit and the reasons for the approach now being taken. The Inspectors report relating to the St Helens Local Plan indicated that the use of a 20% profit was generous in the context of the PPG stating that:
- "Developer profit of 20% for larger developments is particularly robust given that the PPG suggests between 15-20% should be considered a suitable return."*
- 2.107 The Local Plan Viability Assessment prepared for Rossendale included a range of sensitivity testing with a developer profit at 15% of GDV. The Inspectors report in this case noted that:
- "The assessment includes sensitivity testing which is based on varying levels of suitable return for developers which are all within the ranges given in the Viability PPG."*
- 2.108 Notwithstanding the comments made by CW, a profit assumption at 18% of GDV falls well within the range of 15-20% referred to in the PPG for the testing of plan policies. In our view it would not be correct to assess all sites against what is very much the worst case scenario at 20%. Clearly the references made to profit in the Inspectors reports for St Helens and Rossendale indicate the use of a profit return within the PPG range and lower than 20%.
- 2.109 Nevertheless to ensure the robustness of the viability testing we have also stress tested the results by preparing sensitivity testing with a profit based on 20% of GDV. This sensitivity testing is contained at tables 7.1b, 7.2b, 7.3b and 7.4b of FVA2.

- 2.110 The level of profit adopted should be reflective of risk. A financial appraisal may adopt a conservative approach to the inputs whilst in other instances an appraisal may assume relatively nominal allowances for items such as abnormal costs or contingencies. In such circumstances the latter reflects a greater risk profile and hence a higher developer's profit allowance would typically be adopted. In comparison the more conservative appraisal reflects a more limited degree of risk and hence a lower profit would be applied. In the context of FVA2, the assumptions that have been made are generally reasonable and realistic however it is quite clear that the assumptions made for some items including abnormal costs are relatively generous. In addition a contingency has been included at 5% of all costs. In the circumstances, based on the robust assumptions made, there is a more limited degree of risk inherent in the appraisals. This further justifies a profit return for the market dwellings at less than the maximum of 20% referred to in the PPG. A figure at the lower end of the range stated in the PPG, closer to 15% could be justified in the circumstances however following the generally cautious approach in the appraisals we have adopted a return at 18% of the GDV. This is well within the range stated in the PPG at 15 – 20% of GDV.
- 2.111 Having considered the comments made by CW in relation to profit we are content that no further changes are required to FVA2. The profit assumptions that have been adopted are fully supported with reference to the PPG.

Development Period and Cashflow Assumptions

- 2.112 CW support the average sales rate of 3 per month across the market and affordable units adopted in FVA2. They disagree with our view that the sales rate could in fact be higher with affordable units included. Our experience elsewhere is that this is likely to be the case, however as Copeland have historically sought limited affordable housing other than a small amount of discounted market housing, it is not possible to confirm this based on sales data from the Borough. Ultimately it is not material to the viability testing as this is based on 3 sales per month across all tenures.
- 2.113 In terms of the cashflow assumptions then in line with other high level assessments that we have prepared for Local Plans, we have adopted an average approach to all costs. This means that all costs are profiled on a linear basis across the development period rather than being "s-curved", the approach often taken. Using an s-curve approach has the impact of pushing substantive costs later into the development programme and hence potentially understating interest costs. Given the high level nature of the assessment a specific timetable for the s106 contributions and other planning requirements is not available so these costs are assumed to be incurred from commencement of development through the construction programme. The surplus available for additional planning contributions is of course assumed to be a day one contribution paid on commencement.

2.114 CW request that copies of the appraisal printouts be made available. Due to the sheer number of appraisals summaries they have not been provided to date as part of the material but a sample can be made available if this would assist the Inspector and others in considering viability.

Benchmark Land Value

2.115 CW have provided much commentary under this heading. Our understanding of the key points that they are making is as follows:

- a) The EUV adopted for greenfield sites at £10,000 per acre is reasonable;
- b) The EUV for brownfield sites should be a minimum of £150,000 per acre;
- c) The landowner premiums are fixed and could be too low for many sites. In particular in the context of the abnormal costs assumed in FVA2 and the policy costs, this produces a BLV that will not provide landowners with sufficient incentive to release their land for development. No alternative suggestions are made regarding appropriate landowner premiums, or further details provided as to the sites for which the landowner premiums may be too low and how many sites fall into this category.

2.116 We have taken into consideration the comments made by CW and where relevant to the assessment have provided a response based on the three topic areas identified at a) – c) above.

2.117 Our overriding concern in the comments made by CW are that they may not be entirely objective and are not supported by evidence specific to the circumstances in Copeland. For example at para 5.217 they outline the key principle in the PPG that the BLV should provide a reasonable incentive for the landowner to sell their land for development while allowing a sufficient contribution to fully comply with policy requirements. They then go on to say:

"It is implicitly acknowledged that a careful balance must be struck so as to ensure that the BLVs do not place land delivery at risk, and that landowners are appropriately incentivised to bring land forward for development."

2.118 In summing up they neglect to mention that the BLV should also allow a sufficient contribution to fully comply with policy requirements. This point appears to have been omitted in the response from CW and they do not provide any comments as to how this should be addressed in assessing the BLV.

2.119 This aspect is further reinforced at para 5.225 where CW state that:

"that the resultant BLVs are set at an artificially low level without due consideration to all influencing factors which should inform the BLV as set out in the PPGV, notably comparable market evidence and landowner expectations in light of other options available to them (ie. withholding land) if the BLVs are considered too onerous."

2.120 Again landowner expectations are referenced as an influencing factor but no mention is made of the PPG requirement that BLV should also allow a sufficient contribution to fully comply with policy requirements.

2.121 CW also refer to the guidance issued by the RICS that requires an assessor to "stand back" and apply a "viability judgement". This is something that we have done, in particular applying a series of cross checks against different sources of market evidence. We do not intend to repeat the comments contained in para 6.2.29 - 6.2.58 of FVA2 however our judgement was that based on this evidence both in relation to other FVAs and also residential land sales, the BLVs adopted at £150,000 per net developable acre were reasonable. This level of BLV is supported by the average price paid in the residential transactions listed at table 5.22 which is £358,758 per net developable hectare (£144,473 per net developable acre). CW however suggest that in some way this is a default position.

2.122 CW state that the BLV should be varied with respect to sales revenues and also to "reflect" the implications of abnormal costs and site-specific infrastructure costs. For those sites with higher abnormal costs, the BLV would therefore be reduced in comparison to a less impaired site, again assuming that all other circumstances are similar. This is noted at para 6.2.49 of FVA2 with reference made to the fact that where significant abnormal costs are identified then we would expect downward pressure to the BLV figures.

2.123 CW conclude by saying that they would not expect the BLV for any sites to be reduced below the current provisional assumption of £150,000 per net acre unless the site was impaired by an exceptional level of abnormal costs and was situated in a low value area.

2.124 We have considered further these points relating to variation of the BLV with reference to sales prices and abnormal costs later under the heading of landowner premium.

EUV Greenfield

- 2.125 There is nothing specific to note under this heading save for the CW comments at para 5.236 regarding smaller scale greenfield sites or pony paddocks. The EUV adopted for greenfield sites at £10,000 per acre was intended to be generous to reflect the prospects of this type of smaller site coming forward for development (see para 6.2.21 of FVA2). If a viability issue arises in such circumstances at application stage it will be up to the developer to justify a case with reference to the circumstances outlined in the PPG.

EUV Brownfield

- 2.126 CW agree with KM that there is a dearth of transactional evidence relating to brownfield industrial sites in the local area. They do not provide any additional transactional evidence to inform an assessment of EUV for brownfield sites. They refer to the latest B8RE Market Update Report and suggest that we have omitted to refer to this in the evidence base for FVA2. They then refer to the transactional evidence contained within FVA2 and omit for a variety of reasons a number of the transactions to support a higher brownfield EUV. Ultimately they conclude that a minimum EUV of £125,000 to £150,000 per acre would be appropriate for low quality brownfield sites across the district.
- 2.127 Firstly it is worth putting into context the nature of brownfield sites within the Borough. Such sites will take many forms including housing clearance sites (eg HDI2) and redundant sites formerly in commercial use (eg HWH5) or former school sites (eg HCM3). The sites may have been cleared and have become scrubland or informal open space over a number of years. Not all sites will have been in recent industrial or employment use and many may have been vacant and derelict for some years with no viable commercial use. CW state that they would question whether £100,000 per acre is a realistic reflection of secondary brownfield industrial land in Copeland. This is misleading as quite evidently these sites do not constitute secondary brownfield industrial land. They are at best tertiary and indeed many are not industrial sites at all. In terms of their existing use they are cleared housing or school sites that in certain instances have become informal open space.
- 2.128 CW refer to the B8RE market report and infer that this has been omitted from the evidence for Copeland. This is not the case, it is simply that given the Borough's relatively poor road communications and isolated location, the industrial land values analysed in this particular market report are not considered to be comparable for the purpose of this assessment.
- 2.129 Table 5.21 of FVA2 contains details of asking prices for commercial sites currently available for sale. CW have dismissed the site at Clay Flatts as it is being marketed for sale at a low asking price. They also go on to say that not all of the site will be developed and there are unknown ground conditions and planning potential.

- 2.130 Notwithstanding the comments from CW this site should not be dismissed. It is a cleared brownfield site in an established industrial area that has development potential for commercial uses. It is entirely typical of the type of former industrial site that may come forward for development in Copeland. As with any site of this nature, any future development will of course require planning consent and hence planning potential will be uncertain. Similarly ground conditions will, for all of the brownfield sites we are seeking to value, be unknown. This is not usual in the context of the circumstances relating to a typical brownfield site. The sales details refer to a small strip of woodland adjacent to the railway which it is assumed is the part of the site being referred to by CW when they say that not all of the site will be developed. This site did in fact sell at Auction on 16 March 2022 for a price of £131,000. The details confirm that the site area is in fact 1.18 hectares (2.92 acres). The price paid therefore equates to £110,017 per hectare (£44,863 per acre).
- 2.131 CW say that Risehowe Industrial Estate is not a direct comparable because the site comprises buildings with a yard. This is acknowledged in that the site comprises 32,000 sq.ft of industrial buildings together with surfaced open storage of 1.35 acres. However the existing use value in this case is enhanced over and above the value of bare industrial land because of the presence of the buildings.
- 2.132 CW also suggest that FVA2 implies that the prices for the industrial sites listed in table 5.21 contain an element of hope value. This is not correct. The reference in FVA2 is to the fact that given the previous residential consent on the Carlisle site, then the purchase price may reflect residential potential. Elsewhere at para 6.2.24 of FVA2 the reference is to the fact that obtaining evidence of existing use values for older industrial sites is difficult as often their sale is for redevelopment purposes and hence will reflect an element of hope value.
- 2.133 There is an acknowledgement from CW that there is little transactional evidence on which to inform an assessment of EUV for brownfield sites in Copeland. MCHLG in 2019 assessed industrial land values in Copeland to be £150,000 per hectare (£60,728 per acre). There have been historic sales of land in nearby Lillyhall for prices up to £149,000 per hectare (£60,345 per acre). A cleared brownfield site at Clay Flatts Industrial Estate also in Workington has just been sold for £110,017 per hectare (£44,863 per acre). This evidence does not support the CW assertion of an EUV at £125,000 to £150,000 per acre for low quality brownfield land across the Borough. Indeed the available local evidence indicates an EUV at less than the figure of £247,000 per hectare (£100,000 per acre) that is adopted in FVA2.

- 2.134 The results of the viability testing for entirely brownfield sites, show in all cases based on the assumptions in FVA2, that even if planning contributions were waived, the allocation would be unviable. This means that if the site is to come forward for development the landowner, developer or both will need to reduce their expectations in terms of land value and/or profit. It is therefore unrealistic given the outcome of the viability testing for the owners of these brownfield sites to expect a higher EUV and hence BLV than that assumed in FVA2.
- 2.135 Having considered the comments made by CW in the context of the available evidence we do not consider that an increase to the brownfield EUV is justified. Indeed it is clear that a reduced EUV could in fact be justified.

Landowner Premium

- 2.136 CW are concerned that in the context of the abnormal costs assumed in FVA2 and the policy costs, that the landowner premiums adopted are fixed multipliers and the resultant BLVs could be regarded as too low for many development sites in Copeland. As noted earlier no details are provided about which development sites CW are referring to.
- 2.137 CW have acknowledged that in accordance with relevant guidance other LPVAs provide relevant market evidence. The approach taken in FVA2 in considering site specific FVAs in Copeland and Local Plan viability assessments in the wider region is therefore supported.
- 2.138 In relation to greenfield sites, the site specific viability assessment submitted was for a site, which based on the sales price assumptions in FVA2, is located in one of the highest value locations in Copeland. This viability assessment assumed a landowner premium of 10 x EUV. Albeit as noted in para 6.2.35 of FVA2, the approach taken was in theory based on the Cheshire East CIL viability assessment. That being the case the multiplier would have been 15 x EUV. The abnormal costs equated to £2,789 per plot. The Local Plan Viability Assessments noted in table 6.2 of FVA2 assume premiums of 12.5 up to 17.5 EUV for the higher value locations in neighbouring Allerdale. FVA2 adopts a multiplier of 15 x EUV which is consistent with this range.
- 2.139 Our experience is that for brownfield sites a landowner premium is normally expected to be in the range of 10% to 30%. This is supported by the analysis from other Local Plan Viability Assessments contained in the table at **Appendix 2**. We have adopted 50% which actually exceeds the normal range, albeit with reference to table 6.2 is consistent with the approach taken in comparable lower value Locations in St Helens and Rossendale. It is also comparable with the landowner premium adopted in the Allerdale Local Plan Viability Assessment for sites in Outer Workington (which is a similar value location) at 50%.

- 2.140 Due to the relatively high abnormal cost allowances in relation to certain sites, a multiplier at the lower end of the typical range is justified here. This is particularly the case for viability testing at lower values of £2,153 per sq.m (£200 per sq.ft) or less.
- 2.141 CW raise concerns about the use of the Land Registry HPI in adjusting sales values used in other LPVAs to produce table 6.2. The comments made by CW are disproportionate to the reasons for the exercise. The adjustments were made to ensure broad comparability for the purpose of comparison given the passage of time since the respective LPVA. They infer that we have deliberately excluded the line relating to Zone 2 values used in the Rosendale Local Plan. This is not the case as the particular value zone is in excess of values in Copeland and is simply not relevant here.
- 2.142 Sales values in the southern parts of Allerdale around Workington and Maryport are in any event broadly comparable with Copeland. Figure 2.2 illustrates relative values across the area. This is a Zoopla heat map showing comparative values with lower values in blue. It should be noted that this is current at September 2022 however it provides a good illustration of price trends across the area. The map does however show some higher values along the more rural coastal strip from St Bees down to Seascale.

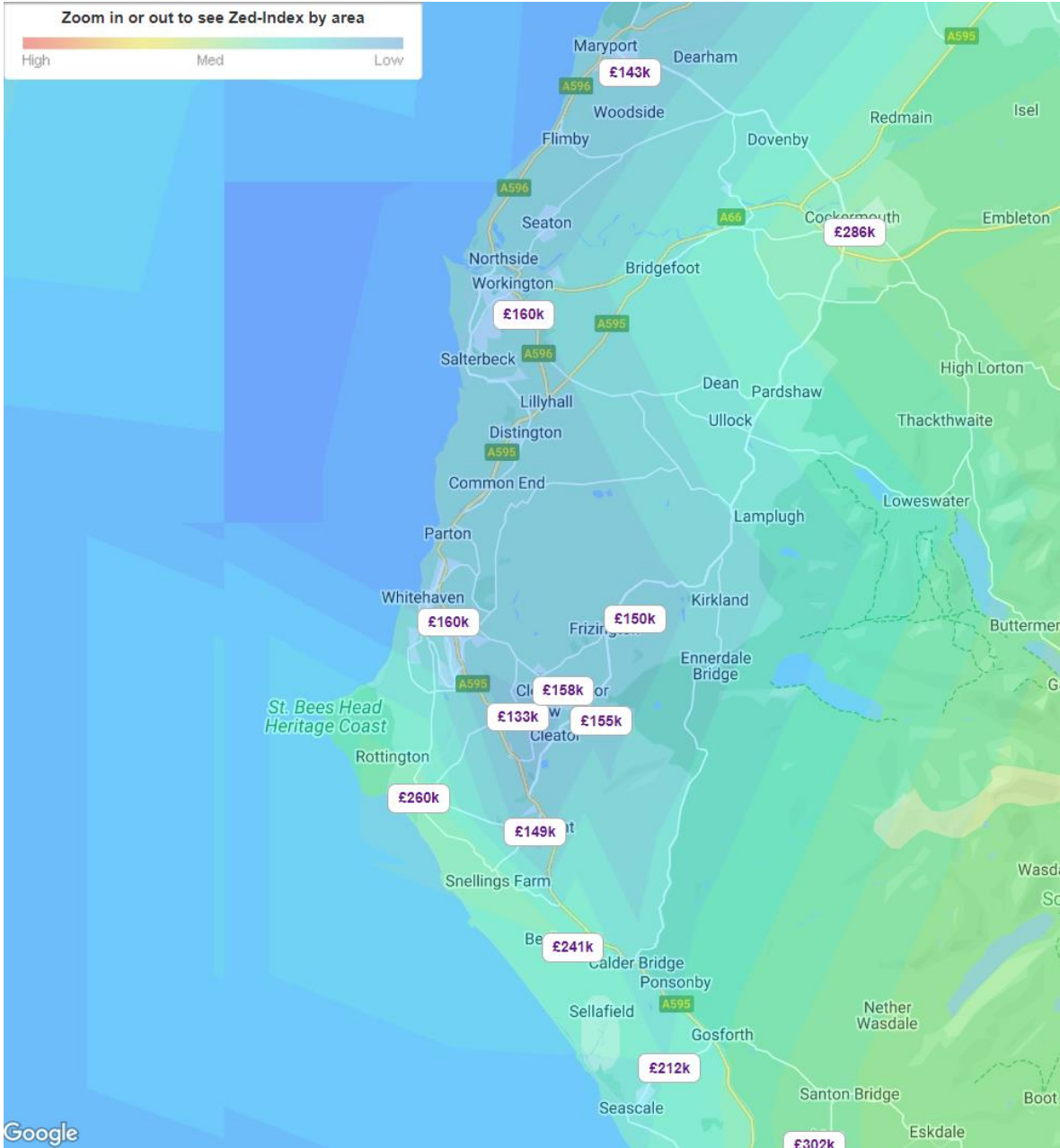


Figure 2.2: Zoopla Heat Map (South Allerdale and Copeland)

2.143 The value zones for St Helens and Warrington are contemporaneous with the date of FVA2 and have not been adjusted. There should be no dispute that these current value zones are those most closely aligned with Copeland.

- 2.144 CW suggest that the BLVs should be indexed to reflect sales price changes. This suggestion is flawed and is not consistent with the PPG. To support these comments reference is made to the Savills Development Land Index. A BLV is based on existing use value plus a landowner premium, not the value of development land. Hence there isn't a 100% correlation between houses price increases and the BLV as CW are suggesting. We do not agree that BLVs should be index linked. Our experience is that the BLV is fixed and it would be for the applicant in any application FVA to demonstrate with reference to the PPG a justification for an alteration to the BLV from that assumed in the Local Plan Viability Assessment.
- 2.145 CW at para 5.278 refer to the premiums adopted for brownfield sites in the Rossendale LPVA at 50% and 60%, and say that as the affordable housing requirement for Rossendale at 30% is less than that for Copeland at 10%, they would expect a reduced BLV for Rossendale when compared to Copeland. They also say that the same comments apply to the Allerdale LPVA, presumably because in locations around Workington the affordable housing requirement is 20% rather than 10%.
- 2.146 Firstly the Rossendale LPVA was completed in March 2019 and the Allerdale LPVA in September 2018. Since this time as CW have acknowledged (para 5.294) there has been a trend of reducing BLVs across more recent assessments. This is further illustrated by the level of premium adopted for brownfield sites in other LPVAs which are summarised at **Appendix 2** of this response.
- 2.147 Secondly CW do not take into consideration the relative level of abnormal costs assumed in the respective LVPAs. The generic brownfield typologies in the Rossendale LPVA included an allowance for abnormal costs excluding POS of £6,500 to £8,000 per dwelling dependent on density. Only one brownfield housing allocation was tested in the Allerdale LPVA and this included an allowance for abnormal and site specific costs at £9,521 per dwelling. In FVA2, then save for HDI2 at £7,129 per dwelling, the other brownfield sites include abnormal allowances at £11,700 up to £28,000 per dwelling. The allowances are significantly higher than for the Rossendale and Allerdale LPVAs. This must be taken into consideration when assessing the premium for brownfield sites in FVA2 in comparison with those adopted for Rossendale and Allerdale.

- 2.148 Applying the CW logic to greenfield sites, then the landowner premium at 15 times EUV for FVA2 should be reduced significantly. The Rossendale study adopted a landowner premium of 15 – 17.5 x EUV. Abnormal costs for these typologies were from £0 to £4,500 per dwelling. The Allerdale LPVA adopted a landowner premium at 12.5 to 17.5 x EUV and the abnormal/site specific costs were from £249 up to £4,790 per dwelling. In comparison for FVA2 the abnormal costs for greenfield sites are significantly higher at £6,403 to £30,105 per dwelling. Given the respective abnormal costs allowances between the studies, then the landowner premium for greenfield sites in FVA2 at 15 times EUV does appear to be comparatively high even allowing for any differences in policy requirements.
- 2.149 CW at para 5.280 refer to the St Helens LPVA, as noted earlier notwithstanding any representations submitted by CW the Inspector found the EVA to be, “realistic, robust, and proportionate.” The Local Plan was found sound and has now been adopted.
- 2.150 We note the comments made by CW regarding the Warrington LPVA; these are not material to the assessment of BLV that we have undertaken.
- 2.151 CW refer in the table at para 5.290 to other area wide viability assessments prepared by KM in the North West. With reference to the assessments listed only the studies for St Helens LPVA and the Rossendale LPVA were undertaken in accordance with the current NPPF and PPG. These LPVAs have been found sound. The remaining studies are not directly relevant as they were prepared under the previous 2012 NPPF regime. The Fylde LPVA was in connection with a partial review of the plan and for this purpose a high level commentary relating to the original 2016 viability study was prepared.
- 2.152 At para 5.295 CW refer to the Blackburn LPVA and say that the approach in FVA2 is inconsistent with the Blackburn study which adopts a landowner premium for greenfield sites at 20 x EUV. The approach to the premium assumption for Blackburn was informed by evidence of site specific FVAs undertaken in the Borough based on uplifts of between 12 and 20 times EUV. Taking into consideration this evidence KM adopted a cautious approach and recommended that the Council adopt a premium at the higher end of this range so as not to test to the margins of viability. The cross check of residential land transactions in the Borough showed an average price paid for sites of £760,694 per net hectare (£307,797 per net acre).
- 2.153 In Copeland by comparison, the single FVA that has been submitted in relation to a greenfield site adopted a landowner premium of 10 x EUV, albeit based on the commentary relating to Cheshire East CIL, then the actual premium may in fact have been 15 x EUV. Furthermore in Copeland and neighbouring Allerdale, the cross check of residential land transactions shows an average price paid of £358,758 per net hectare (£144,473 per net acre), which is less than 50% of the equivalent figure in Blackburn.

- 2.154 Within Blackburn there is high demand for residential development land with a significant number of major national and regional volume housebuilders active in the area. As a result there is competition for residential development land, with the result that a landowner's expectations will increase which in turn translates into a greater level of premium required to incentivise a sale.
- 2.155 In Copeland, circumstances are different. As is evident from FVA2 there is a limited amount of new residential development and there are only a handful of volume house builders active in the Borough ie Story Homes, Gleesons and Persimmon together with regional developer Genesis Homes. As a result competition for land is more limited and this translates into the prices paid for land in the local area which as noted above are on average 50% less than in Blackburn. With more limited demand for sites, fewer potential purchasers and lower residential land prices, a landowner's expectation will be more modest which in turn means that they will be willing to accept a lower premium to secure a sale in Copeland when compared with a landowner in Blackburn. Although sales prices for houses may be similar it is entirely reasonable and appropriate given the factors outlined for the landowner premium to be lower in Copeland than in Blackburn. Contrary to CWs comments, this is not inconsistent.
- 2.156 Reference is made by CW to an appeal relating to an application specific FVA at Holts Lane. This was based on the specific circumstances of the site in 2019 and is not considered material to the assessment of BLV in the context of the Copeland Local Plan.
- 2.157 We agree with the CW comments at para 5.301 that the assessment of BLV is a matter of judgement and the premium required to incentivise release of each site will vary on a site-by-site basis depending on the specific circumstances affecting that particular site. It is also noted CW agree with the FVA2 comments (and the PPG) that for those sites with higher abnormal costs, the BLV should be reduced in comparison with a less impaired site. In considering the impact of abnormal costs and site specific infrastructure costs on the BLV, our experience is that it is typically the landowner premium that is adjusted to reflect the implications of such costs.
- 2.158 The Consultation response from CCC relating to FVA2 also picks up on the point regarding the impact of abnormal costs on the BLV and the fact that some downward adjustment should be made to the assumed BLV for those sites with the highest abnormal development costs.
- 2.159 The assessment of appropriate BLVs has been informed by market evidence of existing use values and a reasonable judgement of a landowner premium having regard to all relevant reference points including site specific and local plan FVAs. Drawing on our significant experience of undertaking FVAs for Local Plans and also planning applications, then "standing back" our judgement is that generally they are objective, rational and robust.

- 2.160 We are however mindful of the comments that have been received relating to the fact that a BLV of £150,000 per acre has been assumed for all sites notwithstanding the fact that the level of abnormal/site specific infrastructure costs (excluding POS) assumed varies across these sites from £6,400 to £30,100 per dwelling. We acknowledge that further refinement to the BLV may therefore be required to “reflect the implications of abnormal costs and site specific infrastructure costs” as noted in the PPG. Our expectation in doing so is that the landowner premium will adjust to account for these factors.
- 2.161 Comments have also been received suggesting that the BLV should also be adjusted to reflect relative values across the Borough. The vast majority of sites that have been tested are within a relatively narrow value band. We are also mindful of the fact that the site specific FVA that has been submitted in relation to a greenfield site in a high value location adopts a landowner premium consistent with the assumption made in FVA2. In the circumstances further adjustment of the BLV to reflect value differentials is not justified particularly in relation to the sites with higher sales revenues. There is perhaps a stronger justification to reduce the BLV for the sites in lower value locations, which would bring them into line with the BLVs assumed for such sites in the Allerdale LPVA at £125,000 per acre. This would involve only a handful of allocations were the sales price is £2,153 per sq.m (£200 per sq.ft) or less.
- 2.162 Having considered the comments made by CW and CCC relating to the impact on the BLV of the abnormal/site specific infrastructure costs, then on reflection we are persuaded that some adjustment is required to the BLV to reflect the relative levels of abnormal costs. A BLV of £150,000 per net acre remains appropriate for the majority of allocations tested where abnormal/site specific infrastructure costs are equivalent to £150,000 per acre or less. For those sites where such costs are equivalent to more than £150,000 per acre a reasonable adjustment to the landowner premium has been applied in line with table 2.2.

Abnormal Cost Range (per net acre)	Premium Adjustment
£150,000 - £199,999	-20%
£200,000 - £249,999	-40%
£250,000 plus	-50%

Table 2.2: Adjustments to Land Owner Premium for Abnormal Costs

- 2.163 A new **Appendix 14** has been added to the final version of FVA2 containing further details of the BLVs that have been adopted for all of the allocations tested including the adjustments made to the BLVs for abnormal development costs.

Results

- 2.164 CW make comment in relation to the results format. The results are presented to show the surplus amounts per sq.m and per dwelling to enable meaningful interpretation by the Council. This is the approach we have taken in the many LPVAs that we have prepared to date that have been found sound. To assist CW a new **Appendix 15** has been added to FVA2 containing further details in relation to the results.
- 2.165 Contrary to the comments made by CW, the assumptions on which FVA2 (and the Addendum Report) are based are robust and evidenced. The total cumulative policy burden has been robustly tested as being viable and deliverable. Development viability is not overstated and full weight can be attached to all results and sensitivity testing undertaken in both FVA2 and this Addendum Report.

Emerging Local Plan Policy Drafting

- 2.166 CW make a point here that it will be necessary for site viability to continue to be assessed at the application stage to account for site-specific circumstances where these differ from those contained in the LPVA. It is expected that this will be the exception rather than the norm, however it is probable that there will be the cases in relation to certain sites where an application FVA will be required. FVA2 does make this point. Nevertheless, it will be for the applicant to demonstrate with reference to the PPG whether particular circumstances justify the need for a viability assessment at application stage. Those particular circumstances could include:

"for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force."

- 2.167 Ultimately as noted in para 008 of the PPG:

"The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and viability evidence underpinning the plan is up to date, and site circumstances including any changes since the plan was brought into force, and the transparency of assumptions behind evidence submitted as part of the viability assessment."

3.0 LOCAL PLAN POLICIES UPDATE

- 3.1 Following the Reg 19 consultation in relation to the Local Plan, some amendments are proposed to the plan policies by the Council. CBC have provided a schedule of proposed changes to policies which may have viability implications. This schedule is contained at **Appendix 3**.
- 3.2 Having considered the changes proposed the only points that may impact on viability are considered to be those outlined below.
- 3.3 **Policy DS6PU** (additional criterion) - Include water efficiency measures such as rainwater recycling measures, green roofs and water butts where possible and appropriate.
- 3.4 In respect of the aspiration to include water efficiency measures such as rainwater recycling measures, green roofs and water butts where possible and appropriate. The guidance is non-specific and the solutions that could meet that requirement can range from very little cost (circa £350 per dwelling) at one end of the scale such as providing water butts to collect rainwater that could be re-used in gardens to the other end of the scale which would be incorporating Green roofs and sophisticated grey water re-cycling schemes. Green roofs are not practical in traditional housing developments and highly unlikely to be a feature. The additional cost would be circa £14k per dwelling. A more sophisticated grey water re-cycling scheme would cost at least £11k per dwelling. It would be designed to collect discharge from hand-wash basins, showers, and baths for reuse in WC flushing. This discharge is required to be kept separate from the other household foul water discharge. Grey water is subsequently directed to a separate underground tank, where it passes through a coarse pre-filter built-in. After the water is treated to remove smells and break down any surfactants, it is then pumped via a built-in submersible pump through a final stage carbon filter.
- 3.5 **Policy DS9** additional wording to the policy that major developments on greenfield sites will require a Soil Resource Plan.
- 3.6 Applications for major developments on greenfield sites will require a Soil Resource Plan and DEFRA has produced guidance for developers on what a Resource Plan should contain. Basically, Developer's need to consider in their external works designs and programme methodology, guidance on the methods that will be used during construction for recovering, storing and reusing soils whilst preventing a loss in quality. It is difficult to ascertain a cost as every site will be unique in terms of its existing quality and in the design of scheme in respect of densities. Developers will need to change their approach and designs need to carefully consider the potential impact on soil quality deterioration. However a well-managed and compliant designed scheme should not necessarily carry a premium cost if the site is not the subject of any particular Abnormal features.

- 3.7 **Policy H8PU** - The following tenure split should be applied to developments that provide affordable housing:
- 25% First Homes;
 - 15% discounted market sales housing, starter homes or other affordable home ownership routes;
 - 60% affordable or social rented.
- 3.8 FVA2 assumed an affordable housing mix comprising 60% affordable rented and 40% discounted market sales housing, starter homes or other affordable home ownership routes. Of this 40% First Homes comprised 25%. It was assumed that the value of affordable home ownership, discount market sales and First Homes would be based on 70% of market value. The proposed change to the policy to increase the proportion of first homes in comparison to other affordable home ownership products, is therefore cost neutral and does not alter the viability testing in FVA2. The assumptions made within the viability assessment are already sufficient to address the proposed change. We have however been asked by CBC to model changes to the First Homes discount with values at 60% and 50% of market value. The results of this additional testing are contained in Section 5.
- 3.9 The consultation in relation to the Local Plan has also resulted in a change in the capacity of HWH1. This now has an estimated yield of 47.5 dwellings following site boundary changes. An updated viability assessment has therefore prepared for this allocation and the results are contained in Section 5.
- 3.10 Approximately 3.6% of the Copeland Local Plan area is located within the Derwent and Bassenthwaite Lake SAC. Within the SAC there is a need to restore stable nutrient levels. Guidance was produced by the Government in March 2022 relating to nutrient neutrality. The guidance requires that local planning authorities carefully consider the nutrient impacts of any new plans or projects on Habitat Sites through the Habitats Regulations process. Most of Copeland is outside the affected area. None of the settlements in the hierarchy or allocated sites are in a catchment with nutrient issues and as a result any impacts arising from such requirements haven't been directly considered in FVA2. If additional European protected sites are included in the future then any associated costs would need to be considered in the context of the available surpluses identified in the viability testing.

4.0 DEVELOPER CONTRIBUTIONS

- 4.1 The viability testing in FVA2 included developer contributions to address affordable housing, onsite open space and highways matters arising from the Transport Improvement Study (TIS) and the Site Access Study. FVA2 acknowledged that contributions may also be required towards matters such as education and also in relation to the playing pitch strategy. Work in relation to these aspects was not however sufficiently progressed to establish the extent to which contributions may be required and if so at what level. As a result reference was made in FVA2 to consideration of the surpluses arising from the appraisals to understand the extent to which the particular allocations could support additional developer contributions.
- 4.2 The CWR and CCCR both make reference to the fact that the appraisals do not factor in these other potential contributions. In addition the CWR refers to the fact that the TIS is flawed as it fails to account for junction improvements so it is likely to underestimate the cost of offsite highways works. The CCCR refers to the fact that the viability testing does include the costs of the highway capacity and safety measures that have been identified on both the local network and A595.
- 4.3 The following paragraphs provide an update in relation to developer contributions matters.

Playing Pitch Contributions

- 4.4 The Playing Pitch Strategy (PPS) is currently not at an advanced enough stage to assign the level of contributions towards sports in the borough to particular site allocations. When determining what level of contributions developers should make towards sporting provision in the borough at planning application stage, the Council will give consideration to the final PPS document and Sport England’s Playing Pitch Calculator where appropriate.
- 4.5 As noted in FVA2 where onsite requirements have been identified for sports provision i.e. replacement pitches then these have already been included in the viability testing carried out in FVA2.

Education Contributions

- 4.6 CBC have prepared an Education Topic Paper as part of the Local Plan evidence base. This Topic Paper shows that, generally, the school places required to support Copeland Borough Council’s Local Plan allocations are available across the district. There are some areas in which developer contributions will be required in order to provide the necessary extra capacity, but it is considered that this can be managed appropriately through the normal planning obligation process in any subsequent planning applications.

- 4.7 The key points arising from this topic paper are summarised in the following paragraphs.
- 4.8 Whilst there may be capacity across the Whitehaven School Planning Area (which covers the whole of Whitehaven) to accommodate the predicted increased demand within the town from the new housing development in South Whitehaven, the available school places are not considered to be in the right location to practically support the regeneration and place making which has been a long term aspiration for the area. Identifying and delivering a new primary school in south Whitehaven is therefore an aim of CBC and CCC. As part of a previous planning permission Story Homes have identified a piece of land for the new school and a £1.7m education contribution has been secured. It is unlikely however that developer contributions would meet the full cost of a new school so third party funding would be required. Work is presently ongoing to determine the suitability of a potential new site for this school and to explore funding opportunities.
- 4.9 Elsewhere in the Borough there are some capacity issues at Bookwell Primary School in Egremont, but it seems the other primary schools might have sufficient spare places to address this issue. Black Coombe Junior School in Millom is almost at capacity, but again there are spaces in other schools in the town to deal with any capacity issues that may arise. Haverigg Primary School only has a couple of spare places but there are no allocations in Haverigg.
- 4.10 In terms of secondary provision there are capacity issues at West Lakes Academy (it is already over capacity, and the position might improve with Whitehaven Academy’s redevelopment which may reduce demand here). CCC have identified a current requirement for 167 additional secondary places to be provided at West Lakes Academy. Based on a secondary multiplier of £25,189 the total cost of these places is £4,206,563. The sites identified to contribute to these additional places are contained in table 4.1. If the potential total contribution is spread pro-rata across these allocations, then this results in a contribution per dwelling of £3,626. As part of the additional viability testing at Section 5 we have retested the allocations in table 4.1, with the inclusion of an education contribution at £3,626 per dwelling.

Settlement	Ref	Address	Capacity	Total Contribution
Cleator Moor	HCM1	Land at Jacktrees Road	127	£460,502
Cleator Moor	HCM2	Land north of Dent Road	96	£348,096
Cleator Moor	HCM3	Former Ehenside School	40	£145,040
Cleator Moor	HCM4	Land at Mill Hill	81	293706
Egremont	HEG1	Land north of Ashlea Road	108	£391,608
Egremont	HEG2	Land at Gulley Flatts	170	£616,420
Egremont	HEG3	Land to south of Daleview Gardens	141	£511,266
Arlecdon	HAR1	Land East of Arlecdon Road	37	£134,162
Seascale	HSE2	Fairways Extension	22	£79,772
Thornhill	HTH1	Land South of Thornhill	20	£72,520
Beckermat	HBE1	Land north of Crofthouse Farm	46	£166,796
Beckermat	HBE2	Land adjacent to Mill Fields	27	£97,902
Bigrigg	HBI1	Land north of Springfield Gardens	65	£235,690
Drigg	HDH2	Wray Head, Station Road	22	£79,772
Moor Row	HMR1	Land to north of social club	37	£134,162
Moor Row	HMR2	Land to south of Scalegill Road	41	£148,666
Summergrove	HSU1	Land to South West of Summergrove	80	£290,080

Table 4.1: Summary of Allocations with Potential Contributions to West Lakes Academy

Highways

- 4.11 In addition to site specific mitigation from allocated sites there are a number of wider impacts to the highway network that have been identified within the Transport Improvement Study (and are referred to in the CWR and CCCR). These have been identified in the IDP but are not specifically attributed to Local Plan allocations and tested for viability here as their total cost would prohibit development of the allocations; their identification in the IDP is primarily to enable funding packages to be developed (which may include an element of developer contributions if viability allows) to enable the effective functioning of the highway network locally.
- 4.12 With reference to the TIS requirements included in FVA2. CCC have noted that in relation to HDI2, the cost of Traffic Calming Measures have been included in the viability testing at £5,100. This cost should in fact be £10,300 and has been updated in the final version of FVA2.
- 4.13 In addition for HDH2 the viability testing includes a cost of £5,500 for a bus shelter upgrade. This is not in fact required and has been excluded from the final version of FVA2.

Summary

4.14 At this stage in the Local Plan process, matters in relation to playing pitch contributions are still to be finalised. These contributions are unlikely to be significant, however at the present time the viability testing does not account for these costs. The viability testing results are presented to demonstrate the surplus that is available once other costs and contributions have been taken into account. Once matters in relation to the playing pitch strategy and associated contributions have been finalised then it will be necessary to assess the amount of surplus (if any) associated with the individual allocations to determine whether they are sufficiently viable to support any playing pitch contributions they may be required.

4.15 This is a valid approach in the absence of certainty regarding playing pitch contributions. It is an approach KM have adopted elsewhere in similar circumstances, most recently in preparing the Local Plan Viability Assessment for Rossendale. In relation to Rossendale the uncertainty related to education contributions and hence the viability assessment report stated that:

"In preparing the viability testing in the LPEVA, education contributions were not directly tested, given the uncertainty about not only their applicability to development but also the level of any contribution. In the circumstances, it was considered that the correct approach would be to identify that any surplus sum remaining would be available to fund education contributions in those circumstances where they might be required. This is an approach that we have adopted elsewhere, in Local Plan viability testing (and has been found acceptable) where similar circumstances exist with uncertainty around the requirements for and amount of any education contribution."

4.16 Here the Inspectors report concluded at para 344, that:

"The Council's viability assessment robustly demonstrates based on reasonable and available information that the cumulative impact of the policies in the Plan will not compromise development viability. The Council's approach is consistent with the advice contained in the Viability PPG."

5.0 ADDITIONAL VIABILITY TESTING RESULTS

5.1 With reference to the comments contained in this Addendum Report, this section contains the results of the additional viability testing that has been undertaken in relation to the following matters:

- a) HWH1 update based on reduced capacity of 48 dwellings
- b) Education Contributions
- c) First Homes (discount to market value)
- d) Alternative Housing Mix

HWH1 Reduced Capacity

5.2 The proposed capacity for HWH1 has been reduced from 127 to 48 dwellings. The viability testing for HWH1 has been updated to reflect this change to capacity. Table 5.1a contains details of the revised results on this basis and table 5.2b contains the results of the sensitivity testing based on changes to developers profit and benchmark land value.

Ref	CPTY	Surplus/deficit (per dwelling)		Cost per dwelling		
		0% AH	10% AH	Ab'mals	POS	TIS
HWH1	48	-£29,537	-£34,018	£38,775	£10,804	£283

Table 5.1a: HWH1 Updated Results

Ref	CPTY	Profit % GDV		BLV	
		15%	20%	-£50,000	+£50,000
HWH1	48	-£28,730	-£37,560	-£30,159	-£37,878

Table 5.1b: HWH1 Sensitivity Testing Profit and BLV

5.3 These tables can be compared to tables 7.1a and 7.1b in FVA2. Based on this reduced capacity the allocation remains unviable, indeed the viability outcome has worsened. This is because many of the abnormal, POS and TIS costs are fixed and a reduction in capacity leads to a pro-rata increase in the cost per dwelling for these items.

Education Contributions

5.4 As noted in paragraph 4.10 we have retested the allocations in table 4.1, with the inclusion of an education contribution at £3,626 per dwelling. The results of this testing on a per dwelling basis are contained in table 5.2. For ease of reference the tables include the results for the respective allocation taken from FVA2, with and without affordable housing. The table then includes the results inclusive of the education contribution based on zero and 10% affordable housing.

5.5 Consistent with the presentation of the results in FVA2, the table shows the surplus/deficit per dwelling.

Ref	CPTY	Surplus/deficit (per dwelling)			
		0% AH	0% AH plus Education	10% AH	10% AH plus Education
HCM1	127	£2,673	-£592	-£3,117	-£6,398
HCM2	96	£2,959	-£366	-£1,386	-£4,713
HCM3	40	-£5,693	-£8,991	-£8,947	-£12,406
HEG1	108	£3,298	£3	-£1,803	-£5,111
HEG2	170	£9,165	£5,996	£5,149	£1,975
HEG3	141	£5,611	£2,379	£1,709	-£1,526
HAR1	37	£256	-£3,159	-£3,782	-£7,197
HSE2	22	-£8,443	-£11,682	-£11,441	-£14,919
HTH1	20	-£17,164	-£20,666	-£20,302	-£23,804
HBE1	46	£8,499	£5,116	£3,587	£204
HBE2	27	£5,853	£2,397	£830	-£2,626
HBI1	65	£9,951	£6,562	£5,490	£2,101
HDH2	22	-£3,717	-£7,195	-£7,028	-£10,506
HMR1	37	£11	-£3,402	-£3,928	-£7,340
HMR2	41	£210	-£3,197	-£3,336	-£6,743
HSU1	80	£11,820	£8,465	£7,565	£4,248

Table 5.2: Viability Results – Education Contributions

5.6 Based on the assumptions adopted in the viability testing, the results from FVA2 show that six of the allocations listed are viable with 10% affordable housing. Of these six the addition of an education contribution of £3,626 per dwelling produces marginal results for two of the allocations. The remaining for allocations remain viable. For the two allocations with marginal results (HEG3 and HBE2) the Council may need to reduce the affordable housing requirement for these sites to secure the full education contribution. Conversely with a reduction in the level of education contribution it would be possible to obtain 10% affordable housing.

5.7 The results for HCM3, HAR1, HSE2, HTH1, HDH2, HMR1 and HMR2 suggest that even absent of affordable housing requirements the Council is unlikely to be able to secure substantive education contributions from these sites.

5.8 In relation to the remaining sites HCM1, HCM2 and HEG1, the Council will need to flexible and may be able to secure some education contributions in the absence of affordable housing.

First Homes Discounts

5.9 The viability testing contained in FVA2 assumes that First Homes are offered with a discount of 30% to market value. To further inform consideration of the level of discount offered on First Homes we prepared further viability testing assuming 40% and 50% discounts are offered. The results are contained in table 5.3. For ease of reference we have included as the first result column the surplus/deficit based on the 30% discount originally tested.

Ref	CPTY	Surplus/deficit (per dwelling)		
		First Homes (70% MV)	First Homes (60% MV)	First Homes (50% MV)
HWH1	48	-£34,018	-£34,417	-£34,834
HWH2	370	£8,607	£8,157	£7,789
HWH4	60	£5,510	£5,203	£4,896
HWH5	532	-£7,494	-£7,841	-£8,156
HCM1	127	-£3,117	-£3,462	-£3,823
HCM2	96	-£1,386	-£1,766	-£2,129
HCM3	40	-£8,947	-£9,418	-£9,874
HEG1	108	-£1,803	-£2,233	-£2,663
HEG2	170	£5,149	£4,772	£4,412
HEG3	141	£1,709	£1,321	£951
HMI1	107	-£3,569	-£3,993	-£4,365
HMI2	195	-£4,569	-£4,936	-£5,285
HAR01	37	-£3,782	-£4,316	-£4,851
HDI1	30	-£9,722	-£10,013	-£10,304
HDI2	30	-£22,425	-£22,697	-£22,968
HSB1	58	£2,073	£1,713	£1,371
HSB3	30	-£7,585	-£7,904	-£8,222
HSE2	22	-£11,441	-£11,855	-£12,269
HSE3	32	-£7,069	-£7,345	-£7,551
HTH1	20	-£20,302	-£20,724	-£21,146
HBE1	46	£3,587	£3,152	£2,699
HBE2	27	£830	£480	£130
HBI1	65	£5,490	£5,084	£4,660
HBI2	35	£1,400	£833	£247
HDH2	22	-£7,028	-£7,452	-£7,856
HDH3	20	-£13,916	-£14,378	-£14,839
HMR1	37	-£3,928	-£4,447	-£4,966
HMR2	41	-£3,336	-£3,809	-£4,227

Table 5.3: Impact of First Homes Discounts

Ref	CPTY	Surplus/deficit (per dwelling)		
		First Homes (70% MV)	First Homes (60% MV)	First Homes (50% MV)
HLO1	22	-£11,773	-£12,177	-£12,563
HSU1	80	£7,565	£7,205	£6,864

Table 5.3: Impact of First Homes Discounts (cont/d)

5.10 The affordable housing requirement in the local plan is only 10%. Of this 10% First Homes comprise 25%. In a scheme of 100 dwellings, only 10 will be affordable and of these 10, 25% or 2.5 dwellings would be for First Homes. As this example shows the quantum of First Homes is limited and hence making a 10% reduction to the market value of a First Home has a relatively small impact on the viability outcome, as the results in table 5.3 show.

5.11 If the affordable housing requirement was 30% then the number of first homes in the example above would increase to 7.5. An increase in the First Homes discount in that case would have a more substantive impact on viability.

Alternative Mix

5.12 As noted in para 2.13 CW in their response suggest that the dwelling mix adopted in FVA2 should be based on the planning application analysis in terms of market delivery rather than the SHMA mix. Within FVA2 we have noted at several points the impact that adopting the SMHA mix has at low densities. The relatively high proportion of smaller one and two bed houses contained in the mix means that at lower densities the site coverage is low. In most cases it is less than the optimum coverage at 13,500 to 15,000 sq.ft per net developable acre delivered by house builders. This scenario also gives rise to the potential for ineffective use of the land.

5.13 As noted earlier in paras 2.13 – 2.14 we have prepared additional viability testing based on the mix contained in table 2.1. At the densities tested this alternative mix improves the efficiency of the site coverage with the majority of allocations in the range from 12,900 sq.ft to 15,500 sq.ft per net developable acre.

5.14 At **Appendix 4** we have included the revised construction costs based on this alternative mix.

5.15 The results of this viability testing based on this alternative mix are contained in table 5.4. The results are presented to show the surplus or deficit per dwelling. To enable a direct comparison we have also included details for the respective allocation of the site coverage and results (based on the original mix) from FVA2. For comparison purposes the testing for HWH1 is based on the original capacity of 127 dwellings.

Settlement	Ref	Address	Capacity	Density	Original Mix			Alternative Mix		
					Site Coverage (sf/acre)	No Affordable	10% Affordable	Site Coverage (sf/acre)	No Affordable	10% Affordable
Whitehaven	HWH1	Land at West Cumberland Hospital	127	32	12,570	-£12,176	-£16,271	13,693	-£7,974	-£12,201
Whitehaven	HWH2	Red Lonning and Harras Moor	370	30	11,799	£12,540	£8,607	12,869	£17,699	£13,420
Whitehaven	HWH4	Land south and west of St Mary's School	60	33	13,000	£10,610	£5,510	14,165	£13,474	£8,156
Whitehaven	HWH5	Former Marchon Site North	532	36	14,183	-£3,619	-£7,494	15,458	£505	-£3,517
Cleator Moor	HCM1	Land at Jacktrees Road	127	33	12,963	£2,673	-£3,117	14,120	£7,255	£1,128
Cleator Moor	HCM2	Land north of Dent Road	96	30	11,821	£2,959	-£1,386	12,924	£7,744	£3,035
Cleator Moor	HCM3	Former Ehenside School	40	38	14,970	-£5,693	-£8,947	16,311	-£2,259	-£6,256
Egremont	HEG1	Land north of Ashlea Road	108	30	11,815	£3,298	-£1,803	12,856	£8,149	£2,664
Egremont	HEG2	Land at Gulley Flatts	170	33	13,025	£9,165	£5,149	14,216	£13,946	£9,696
Egremont	HEG3	Land to south of Daleview Gardens	141	30	11,814	£5,611	£1,709	12,865	£10,340	£6,134
Millom	HMI1	Land west of Grammerscroft	107	33	12,956	£348	-£3,569	14,112	£4,895	£668
Millom	HMI2	Moor Farm	195	33	13,006	-£589	-£4,569	14,174	£3,848	-£562
Arlecdon	HAR1	Land East of Arlecdon Road	37	30	11,805	£256	-£3,782	12,897	£4,787	£496
Distington	HDI1	Land south of Prospect Works	30	30	11,945	-£5,748	-£9,722	13,139	-£1,265	-£5,543
Distington	HDI2	Land south west of Rectory Place	30	35	13,936	-£18,710	-£22,425	15,329	-£15,299	-£19,281

Table 5.4: Overall Summary of Viability Testing Results Housing Allocations (surplus/deficit per dwelling)

Settlement	Ref	Address	Capacity	Density	Original Mix			Alternative Mix		
					Site Coverage (sf/acre)	No Affordable	10% Affordable	Site Coverage (sf/acre)	No Affordable	10% Affordable
St Bees	HSB1	Land adjacent Abbots Court	58	35	13,817	£6,813	£2,073	15,003	£11,718	£6,799
St Bees	HSB3	Fairladies Extension	30	30	11,945	-£3,348	-£7,585	13,139	£2,583	-£4,960
Seascale	HSE2	Fairways Extension	22	30	11,665	-£8,443	-£11,441	12,925	-£3,780	-£7,198
Seascale	HSE3	Town End Farm East	32	30	11,832	-£3,383	-£7,069	12,951	£1,155	-£2,905
Thornhill	HTH1	Land South of Thornhill	20	35	13,788	-£17,164	-£20,302	15,024	-£14,144	-£17,720
Beckermet	HBE1	Land north of Crofthouse Farm	46	32	12,523	£8,499	£3,587	13,657	£13,865	£8,750
Beckermet	HBE2	Land adjacent to Mill Fields	27	30	11,660	£5,853	£830	12,686	£11,001	£12,188
Bigrigg	HBI1	Land north of Springfield Gardens	65	35	13,772	£9,951	£5,490	14,994	£14,397	£9,740
Bigrigg	HBI2	Land west of Jubilee Gardens	35	30	11,845	£5,698	£1,400	12,924	£10,819	£6,234
Drigg	HDH2	Wray Head, Station Road	22	30	11,665	-£3,717	-£7,028	12,925	£1,326	-£2,234
Holmrook	HDH3	Hill Farm Holmrook	20	30	11,819	-£10,489	-£13,916	12,877	-£6,426	-£10,290
Moor Row	HMR1	North of social club	37	32	12,592	£11	-£3,928	13,757	£4,143	-£41
Moor Row	HMR2	South of Scalegill Road	41	30	11,801	£210	-£3,336	12,834	£4,459	£680
Lowca	HLO1	Solway Road	22	30	11,665	-£8,806	-£11,773	12,925	-£4,462	-£7,728
Summergrove	HSU1	South West of Summergrove	80	30	11,819	£11,820	£7,565	12,877	£12,350	£12,068

Table 5.4: Overall Summary of Viability Testing Results Housing Allocations (surplus/deficit per dwelling)

- 5.16 The alternative mix produces a more efficient site coverage which in turn gives rise to a significant improvement in viability across the allocations. In the original FVA2 testing 10 of the 30 allocations tested were viable inclusive of 10% affordable housing. The results in table 5.4 show that based on the alternative mix, the number of viable schemes inclusive of 10% affordable housing rises to 16. Previously there had been 12 unviable allocations inclusive of 10% affordable housing. The results in table 5.4 show that with the alternative mix the number of unviable allocations on this basis is now seven.
- 5.17 The results with no affordable housing show that based on this alternative mix, the number of unviable sites reduces by 50% to four.
- 5.18 The level of site coverage produced by this alternative mix is in fact still relatively conservative with 16 of the allocations still having a site coverage at less than 13,500 sq.ft. As a result it would still be possible to improve these results further and to potentially increase the number of viable scenarios.

6.0 CONCLUSIONS

- 6.1 Following publication of FVA2 in draft, substantive responses relating to viability were received from CW and CCC. These responses have been reviewed and due consideration given to the comments made. Section 2 of this Addendum Report contains our comments relating to the responses.
- 6.2 Additional commentary and justification is provided in Section 2 relating to the following matters:
- a) Gross to net site area
 - b) Dwelling Mix
 - c) Sales Values
 - d) Construction Costs
 - e) Developers Profit
 - f) Benchmark Land Value
 - g) Results
- 6.3 Having reflected on the consultation responses then we do not consider that substantive changes are required to the approach taken in FVA2. There are however a small number of areas where changes have been made. Firstly in relation to the points made regarding dwelling mix, we have included further information in the planning application analysis at Appendix 4 of FVA2, including in relation to a number of planning applications in neighbouring Allerdale. We have also prepared further viability testing based on an alternative housing mix containing a greater proportion of larger dwellings.
- 6.4 Following comments relating to the construction related costs we have provided additional tables 6.9 and 6.10 in FVA2. These tables are based on the construction cost summary contained at Appendix A of the Construction Costs Report and have been provided in the main report for ease of reference. A number of minor adjustments have been made to the column headings and tables in Appendix A for clarification following comments received from CW. Also the BCIS benchmarking exercise has been represented and the BCIS extract for Copeland included at Appendix B.
- 6.5 In considering the approach to the BLV, then we have taken on board the comments made that the BLV of £370,500 per net hectare (£150,000 per net developable acre) applied to all allocations in the draft FVA2, doesn't properly reflect the significant range of abnormal costs that have been applied in the viability testing. CCC are quite correct in their comments that some downward adjustment should be made to the assumed BLV for those sites with the highest abnormal development costs. We have therefore made reasonable adjustments to the landowner premium and hence the BLV for those sites where abnormal costs are relatively high.

6.6 Further explanation is provided at para 2.162 and table 2.2 of this Addendum Report. FVA2 has been updated at para 6.2.59 and a new Appendix 14 has been added containing details of the BLVs adopted for the respective allocations and generic testing. The viability testing contained in the final version of FVA2 is based on these revised BLVs and the results tables have been updated accordingly, with a footnote added to identify entries where there has been a change.

6.7 CW have requested detailed results of the testing and a new Appendix 15 has been added to FVA2 which includes all details. The final updated viability results in FVA2 are contained in the following tables:

Table 7.1a – Whitehaven Allocations

Table 7.2a - Key Service Centre Allocations

Table 7.3a - Local Service Centre Allocations

Table 7.4a - Sustainable/Other Rural Villages Allocations

Table 7.5 - Overall Summary of Viability Testing Results Housing Allocations

Table 7.6a - 5 Dwellings Greenfield

Table 7.6b - 5 Dwellings Brownfield

Table 7.7a: 10 Dwellings Greenfield

Table 7.7b: 10 Dwellings Brownfield

6.8 In preparing this Addendum Report we have also considered proposed changes to the Local Plan. Having considered the summary provided by CBC contained at Appendix 3 we do not consider that any changes are required to the viability testing already undertaken. A greater proportion of First Homes are required in comparison with other affordable home ownership options however this change is cost neutral and doesn't alter the viability testing in FVA2. Following a request from CBC we have modelled alternative options in terms of the First Homes discount. The overall affordable housing requirement is only 10% and a quarter of this 10% is to be First Homes. The number of First Homes required in the majority of cases is therefore small and as a result changes to the First Homes discount has a very limited impact on viability as the results in table 5.3 demonstrate.

6.9 The proposed changes to the Local Plan include the reduction in capacity of HWH1 from 127 to 48 dwellings. The testing in FVA2 identified HWH1 as being unviable based on the assumptions made. The results based on this reduced capacity (tables 5.1a and 5.1b) show that the allocation remains unviable and the deficit has in fact increased.

6.10 Section 4 of this Addendum Report contains an update in relation to developer contributions. Matters in relation to any potential playing pitch contributions are not yet sufficiently progressed to identify the level of contributions if any that will be required from future development sites.

- 6.11 In relation to education contributions a requirement for additional places at West Lakes Academy has been identified. Table 4.1 contains details of the allocations that could contribute to this requirement. Further viability testing of these allocations has been carried out inclusive of a contribution of £3,626 per dwelling. The results of this testing in table 5.2 show that inclusive of the education contribution and 10% affordable housing, then four allocations are viable. There are five allocations for which the Council will need to take a flexible approach to the level of affordable housing and education contribution. A further seven allocations are not sufficiently viable to support substantive planning contributions in any event.
- 6.12 In relation to highways matters minor adjustments have been noted to the TIS contributions for HDI2 and HDH2. The tables in FVA2 and the associated viability testing has been updated accordingly to reflect these changes.
- 6.13 In response to the comments received from CW regarding the dwelling mix assumed for the viability testing in FVA2, we have undertaken additional viability testing based on the alternative mix contained in table 2.1. This alternative mix is more reflective of the planning application analysis as it includes a greater proportion of larger dwellings. The measure of site coverage increases, with the range across the allocations being from 12,900 sq.ft to 15,500 sq.ft per net developable acre. This level of coverage, whilst still low in certain instances is more consistent with typical optimum ranges sought by house builders. This range of site coverage also ensures greater efficiency in land use.
- 6.14 The results of the additional viability testing based on the alternative housing mix are contained in table 5.4. In comparison with the housing mix adopted in FVA2, there is a very significant improvement in viability. Assuming 10% affordable housing, then there is an increase in the number of viable allocations from 10 to 16. The number of unviable allocations on this basis reduces from 12 to 7.
- 6.15 The overall conclusions of FVA2 in terms of the viability and deliverability of the plan do not change, however the viability testing of this alternative mix re-enforces the point that the SHMA mix, particularly when it is applied at low densities, will impact on viability. The Council may therefore wish to consider a more flexible approach by including a higher proportion of larger dwellings in certain instances. This would also meet the identified requirement for larger executive dwellings, in the Housing Needs Study.

- 6.16 As an alternative if the SHMA mix is applied, then the Council may wish to ensure that development takes place at a higher density in excess of 35 dwellings per hectare. These approaches will ensure that land is used effectively, in accordance with plan policies. They will also ensure that prospects for viability and delivery of affordable housing and other contributions are maximised.



.....
Ged Massie BSc (Hons) MRICS IRRV MCI Arb
Director
Registered Valuer
For and on behalf of
KEPPIE MASSIE LTD

DATE: October 2022



.....
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For and on behalf of
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APPENDIX 1

**LAND REGISTRY AVERAGE PRICE DATA
(NEW BUILD AND EXISTING DWELLINGS)**

Appendix 1 - Land Registry New Build V Existing Average Prices (Copeland)

Sales volume	Average price New build	Average price Existing properties	Date	Percentage Premium
119	£167,621	£129,728	01/12/2020	29.21%
131	£165,134	£126,588	01/11/2020	30.45%
62	£162,850	£124,736	01/12/2019	30.56%
81	£158,784	£121,506	01/12/2017	30.68%
76	£171,105	£130,736	01/01/2021	30.88%
63	£162,177	£123,182	01/01/2020	31.66%
56	£160,849	£122,019	01/01/2018	31.82%
102	£165,721	£125,456	01/08/2020	32.09%
45	£152,701	£115,575	01/01/2019	32.12%
139	£164,552	£124,531	01/10/2020	32.14%
108	£166,039	£125,545	01/11/2019	32.25%
98	£159,757	£120,629	01/07/2018	32.44%
79	£158,675	£119,658	01/12/2018	32.61%
73	£158,222	£119,247	01/02/2020	32.68%
127	£175,877	£132,486	01/02/2021	32.75%
83	£157,626	£118,701	01/11/2018	32.79%
100	£163,987	£123,373	01/08/2018	32.92%
88	£160,993	£121,012	01/07/2020	33.04%
103	£161,240	£121,194	01/08/2019	33.04%
111	£164,265	£123,449	01/09/2020	33.06%
82	£162,094	£121,744	01/09/2018	33.14%
90	£163,337	£122,619	01/06/2018	33.21%
82	£158,580	£119,033	01/06/2019	33.22%
89	£166,476	£124,813	01/10/2019	33.38%
100	£156,858	£117,487	01/07/2019	33.51%
100	£163,112	£121,823	01/10/2018	33.89%
86	£161,496	£120,457	01/05/2018	34.07%
103	£164,621	£122,639	01/09/2019	34.23%
60	£162,010	£120,648	01/03/2020	34.28%
99	£184,092	£136,914	01/08/2021	34.46%
97	£163,917	£121,737	01/05/2019	34.65%
75	£163,195	£121,126	01/02/2018	34.73%
61	£165,984	£123,077	01/06/2020	34.86%
34	£166,028	£123,107	01/04/2020	34.86%
111	£183,239	£135,802	01/07/2021	34.93%
65	£156,580	£115,985	01/02/2019	35.00%
130	£176,909	£130,671	01/03/2021	35.39%
127	£185,453	£136,915	01/06/2021	35.45%
101	£165,497	£121,728	01/03/2018	35.96%
100	£157,932	£116,060	01/03/2019	36.08%
45	£166,418	£122,204	01/04/2018	36.18%
176	£185,401	£135,980	01/09/2021	36.34%
90	£165,823	£121,554	01/04/2019	36.42%
58	£163,951	£120,084	01/05/2020	36.53%
116	£182,361	£132,687	01/04/2021	37.44%
93	£180,853	£131,487	01/05/2021	37.54%
89	£190,146	£137,762	01/10/2021	38.02%
				33.77%

APPENDIX 2

**ABNORMAL COSTS FROM LOCAL PLAN
VIABILITY ASSESSMENTS**

Appendix 2

Table 1: Other LPVAs Greenfield Abnormal Cost Assumptions and Benchmark Land Values

Authority	Abnormal/Infrastructure (per dwelling)		Benchmark Land Value		
	30 dph	35 dph	Premium	Net Developable Ha	Net Developable Acre
North Warwickshire Borough Council	£0	£0	15	£300,000	£121,457
Middlesbrough Borough Council	£0	£0	20% plus £250,000 per ha	£365,333	£147,908
Wirral Metropolitan Borough Council	£0	£0	20	£494,000	£200,000
Harrogate Borough Council	£0	£0	20% plus £350,000 per ha	£498,667	£201,889
Sunderland City Council	£0	£0	20% plus £350,000 per ha	£498,667	£201,889
Calderdale Metropolitan Borough Council	£0	£0	15 plus 25%	£524,875	£212,500
South Kesteven District Council	£0	£0	20% plus £425,000 per ha	£565,333	£228,880
Shropshire Council	£0	£0	EUV plus £400,000 ha	£566,667	£229,420
Halton Council	£0	£0	21	£630,000	£255,061
North Lincolnshire Council	£0	£0	50% share uplift to residential	£631,732	£255,762
Lancaster City Council	£0	£0		£679,250	£275,000
Cheshire East	£0	£0	EUV plus £600,000 ha	£833,333	£337,382
Bassetlaw District Council	£0	£0	50% share uplift to residential	£923,445	£373,864
Salford Council	£1,500	£1,286	13.5	£413,333	£167,341
Northumberland Council	£2,500	£2,143	17.14	£400,000	£161,943
Durham Council	£2,500	£2,143	21.67	£433,333	£175,439
Doncaster Metropolitan Borough Council	£3,333	£2,857	12.5	£333,333	£134,953
Darlington Borough Council	£5,143-£5,513	£4,745 - £5,799	20	£494,400	£200,162
Wakefield Council	£8,233	£7,057	25	£617,500	£250,000
Lichfield District Council	£10,000	£8,571	10	£333,333	£134,953
Central Lincolnshire	£10,000	£10,000	10	£263,573	£106,710
North East Derbyshire District Council	200-400 units - £7,500 1,000 plus - £12,500			£432,250	£175,000

Authority	Abnormal/Infrastructure (per dwelling)		Benchmark Land Value		
	30 dph	35 dph	Premium	Net Developable Ha	Net Developable Acre
Bolsover District Council	200-400 units - £7,500 1,000 plus - £12,500			£300,000	£121,457
Warrington Borough Council	£16,850	£16,850	16.67	£370,500	£150,000
Solihull Metropolitan Borough Council	300+ units - £20,000			£395,200	£160,000
Lancaster (Climate Emergency review)	10-100 - £5,000 101 - 500 - £10,000 500+ - £26,000		20	£482,667	£195,412

Appendix 2

Table 2: Other LPVAs Brownfield Abnormal Cost Assumptions and Benchmark Land Values

Authority	Abnormal/Infrastructure (per dwelling)			Benchmark Land Value		
	30 dph	35 dph	40 dph	Premium	Net Develop Ha	Net Develop Acre
North Warwickshire Borough Council	£0	£0	£0	0%	£400,000	£161,943
North Lincolnshire Council	£0	£0	£0	50% share uplift to residential	£744,873	£301,568
Bassetlaw District Council	£0	£0	£0	50% share uplift to residential	£1,125,945	£455,848
Wirral Metropolitan Borough Council	£4,100	£3,514	£3,075	10%	£330,000	£133,603
Middlesbrough Borough Council	£4,285 - £4,594	£3,954 - £4,833	£4,162 - £4,401	20%	£320,000	£129,555
Halton Council	£4,285 - £4,594	£3,954 - £4,833	£4,162 - £4,401	20%	£560,000	£226,721
South Kesteven District Council	£4,285 - £4,594	£3,954 - £4,833	£4,162 - £4,401	20%	£640,000	£259,109
Shropshire Council	£4,285 - £4,594	£3,954 - £4,833	£4,162 - £4,401	20%	£800,000	£323,887
Harrogate Borough Council	£4,285 - £4,594	£3,954 - £4,833	£4,162 - £4,401	20%	£960,000	£388,664
Cheshire East	£4,285 - £4,594	£3,954 - £4,833	£4,162 - £4,401	20%	£1,184,000	£479,352
Northumberland Council	£5,000	£4,286	£3,750	25%	£333,333	£134,953
Durham Council	£5,000	£4,286	£3,750	22.22%	£366,667	£148,448
Salford Council	£5,333	£4,571	£4,000		£592,000	£239,676
Doncaster Metropolitan Borough Council	£6,667	£5,714	£5,000	15%	£266,667	£107,962
Wakefield Council	£8,233	£7,057	£6,175	67%	£617,500	£250,000
Sunderland City Council	£8,571 - £9,188	£7,908 - £9,666	£8,325 - £8,803	20%	£640,000	£259,109
Lancaster City Council	£9,057	£7,763	£6,793		£555,750	£225,000
Lichfield District Council	£10,000	£8,571	£7,500		£1,133,333	£458,839
Darlington Borough Council	£11,142 - £11,944	£10,280 - £12,565	£10,822 - £11,443	33%	£494,400	£200,162
Bolsover District Council	200-400 units - £7,500 1,000 plus - £12,500				£275,000	£111,336
North East Derbyshire District Council	200-400 units - £7,500 1,000 plus - £12,500				£420,000	£170,040
Warrington Borough Council	£16,850	£16,850	£16,850	20%	£592,800	£240,000
Calderdale Metropolitan Borough Council	£17,013	£14,583	£12,760			
Central Lincolnshire	£19,057	£20,723	£22,390	10%	£597,740	£242,000

Authority	Abnormal/Infrastructure (per dwelling)			Benchmark Land Value		
	30 dph	35 dph	40 dph	Premium	Net Develop Ha	Net Develop Acre
Solihull Metropolitan Borough Council	300+ units - £20,000					
Lancaster (Climate Emergency review)	10-100 - £5,000 101 - 500 - £10,000 500+ - £26,000			30%	£392,000	£158,704

APPENDIX 3

LOCAL PLAN POLICY CHANGES

Changes to emerging Local Plan that <i>might</i> change viability					
36	DS3PU, Sustainable Rural Villages row, second column	Smaller scale housing allocations and windfall and infill development will be supported in principle. The focus for employment development will be Whitehaven Commercial Park for employment development	For clarity and to ensure consistency with other tiers above.	CBC	
37	DS3PU, Rural Villages Row, second column	Existing services will be retained and development will be small scale and primarily infill and rounding off windfall and infill developments	For clarity and to ensure consistency with other tiers above. Rounding off suggests development outside the settlement boundaries would be supported which is not generally the case	CBC	
39	5.5.8 new footnote	...It also allows for suitable windfall developments to take place on sites directly adjoining and well-connected ²⁵	For information	CBC	
39	New footnote 25	The Settlement Hierarchy and Development Strategy Paper identifies safe pedestrian routes to be those that are a mile or less long, with a lit pavement.	For information	CBC	
45	6.3.4 additional sentence	Where a viability assessment is submitted alongside a planning application this will be assessed by the Council at the expense of the applicant.	For clarity	CBC	
49	Policy DS6, criterion m	Uses appropriate levels and types of external lighting that does not create light pollution and helps maintain dark skies in line with up to date dark skies guidance	For clarity	Friends of the Lake District/CBC	
49	Policy DS6PU (additional criterion)	Include water efficiency measures such as rainwater recycling measures, green roofs and water butts where possible and appropriate	To improve the effectiveness of the policy and reduce the impact upon flooding	United Utilities/CBC	
49	Policy DS6PU, last line	Developers must take a comprehensive and co-ordinated approach to development by respecting existing site constraints	For clarity	National Grid via Avison Young/Natural England/CBC	

		including utilities infrastructure on site. Applications for major development proposals should also produce and include a Sustainable Construction Environmental Management Plan as part of their applications		
50	Policy DS7PU	Where appropriate, a high quality landscaping scheme should be submitted with all proposals for development.	The use of the word "all" next to "where appropriate" is confusing and not all proposals will require a landscaping scheme i.e. it will not be required for some householder developments.	CBC
52	Policy DS8, criterion a	Directing development to allocated sites outside areas of flood risk where possible; where this cannot be achieved ensuring that development is designed to address the existing levels of flood risk without increasing flood risk elsewhere	For clarity	CBC
53	Policy DS9	Where appropriate New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate. Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for landscape, biodiversity and recreation	For clarity	CCC/CBC
54	6.7.3 (additional paragraph after 6.7.2)	Applications for major developments on greenfield sites will require a Soil Resource Plan. This should contain guidance on the methods that will be used during construction for recovering, storing and reusing soils whilst preventing a loss in quality. DEFRA has produced guidance for developers on what a Resource Plan should contain.	For information	CBC
55	Policy DS10PU, contamination section	... Contamination and Land Stability The Council will proactively work with developers and other partners to identify opportunities to remediate contaminated and unstable sites.	For clarity	The Coal Authority/CBC

Commented [LC1]: Do you think this constitutes a material change or more just highlighting an extant material requirement? I have no idea but thought I'd mention

		<p>Development sites likely to have caused detriment to land quality will need to be risk assessed. Some sites will be more sensitive due to the location of sensitive environmental and human health receptors e.g. flood risk areas, surface waters, vulnerable aquifers, housing, schools, hospitals, children's play areas.</p> <p>It is the developer's responsibility to secure safe development and provide the necessary information at the time of the application. The minimum information that should be provided by an applicant is the report of a Preliminary Investigation (desk study, site reconnaissance and preliminary risk assessment) or Coal Mining Risk Assessment, where necessary. The findings of this assessment should determine if further investigation is needed....</p>		
69	Policy E2PU table, additional row (Rural Villages) after Sustainable Rural Villages	<p>Rural Villages</p> <p>Small scale economic opportunities including:</p> <ul style="list-style-type: none"> • Expansion of existing businesses • Re-use of existing buildings • Diversification of existing buildings that provide economic opportunity suitable to the role of a Rural Village 	Not currently clear what type of development would be appropriate in rural villages	CBC
80	Policy RE1PU, criterion C	The building is of a scale, form and design which is appropriate to the location and will not result in adverse visual impacts, or unacceptable adverse harm to the landscape character or heritage assets.	To ensure the plan puts forward a positive strategy for the conservation and enhancement of the historic environment.	Historic England/CBC
81	Policy RE2PU, (second to last paragraph)	All development must be of a scale, form and design appropriate to the location and will not result in adverse visual impacts or unacceptable adverse harm to the landscape character or heritage assets.	To ensure the plan puts forward a positive strategy for the conservation and enhancement of the historic environment.	Historic England/CBC

115	Policy R5PU, criterion a	Its continued use as a village shop, post office or public house is no longer feasible, having had regard to appropriate marketing (over twelve months and at a price which reflects its use, condition and local market values), the demand for the use of the site or premises, its usability and the identification of a future occupier. Applicants must demonstrate that full consideration has been given any opportunities available to retain the existing use as part of a shared/combined service in order to improve viability.	To ensure all viable options have been considered and exhausted before the site is lost to an alternative use.	Friends of the Lake District/CBC
127	Policy T1PU, paragraph 2	All tourism development must be of an appropriate scale, located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets (including landscapes, heritage assets and biodiversity) or the character of the area.	To ensure the Plan puts forward a positive strategy for the conservation and enhancement of the historic environment.	Historic England/CBC
128	Policy T2PU, last paragraph	In all circumstances development should be of an appropriate scale, located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets including landscapes, heritage assets and biodiversity.	To ensure the Plan puts forward a positive strategy for the conservation and enhancement of the historic environment.	Historic England/CBC
129	Policy T3PU (new criterion after criterion ii)	Not result in unacceptable harm to heritage assets	To ensure the Plan puts forward a positive strategy for the conservation and enhancement of the historic environment.	Historic England/CBC
138	Policy H2PU	The Housing requirement is for a minimum of 2,482 2628 net additional dwellings (an average of 146 dwellings per annum) to be provided between 2021 and 2038 2039 . This figure will be used when calculating the five-year supply of deliverable housing sites in the borough. In order to plan positively and support employment growth over the Plan period, the Plan identifies a range of attractive allocated housing sites, which when combined with future windfall development, previous completions and extant permissions,	To ensure at least 15 years are covered by the Local Plan post adoption	Story Homes C/O Pinnacle/CBC

		will provide a minimum of 3,400 3600 dwellings (an average of 200 dwellings per annum) over the Plan period.		
141	Policy H4PU	The amount of housing identified within the Sustainable Villages and Rural Villages, required to support economic growth, is limited to the amount shown.	This sentence would potentially prevent development on suitable sites once the target for the tier has been met and is therefore not considered to accord with the NPPF. Inappropriate growth is prevented by other policies within the Local Plan such as the settlement boundary policy, this phrase is therefore not required.	Story Homes C/o Pinnacle/Home Builders Federation/CBC
141	Policy H4PU (last column)	1360 minimum 1020 minimum 578 minimum	For clarity as all of the figures can be exceeded within the table where appropriate as set out in the supporting text.	Story Homes C/o Pinnacle/Home Builders Federation/CBC
157	Policy H8PU, criterion 2NPPF* (or any document superseding it)	For clarity	CBC
157	Additional footnote linked to above	In terms of the exemption relating to people who wish to build or commission their own homes, this is only applicable to affordable home ownership routes	For clarity	CBC
157	Policy H8PU, paragraph 3	The following tenure split should be applied to affordable housing developments developments that provide affordable housing: <ul style="list-style-type: none"> • 25% First Homes • 15% 40% discounted market sales housing, starter homes or other affordable home ownership routes¹ (25% of these must meet the definition of First Homes). 	For clarity	CBC/Story Homes C/o Pinnacle

¹ As defined in the NPPF Glossary

		<ul style="list-style-type: none"> 60% affordable or social rented. 		
168	Policy H16PU, additional footnote	For example, it would be unreasonable to expect a retired farm worker who has resided on the holding for many years to vacate a dwelling to make it available.	Required to acknowledge that succession farming occurs in light of caselaw (<i>Keen v Secretary of State for the Environment and Aylesbury Vale District Council</i>)	CBC
169	Policy H17PU, criterion a	The building is redundant or disused and is of a traditional design which contributes to the character of the area the proposal would not have an adverse effect on the historic environment, the character of the local landscape or its setting	For clarity	CBC
170	Policy H17PU, additional criterion	g) The proposal would not have an adverse effect on the historic environment or the landscape	For clarity	CBC
171	Policy H18PU, criterion a	the replacement dwelling is to be sited on, or close directly adjacent to the footprint of the existing dwelling to be replaced, unless there are clear and demonstrable reasons why an alternative siting or footprint will deliver a more appropriate scheme.	For clarity	Friends of the Lake District/CBC
171	Policy H18PU	The erection of a replacement dwellings outside of identified settlement boundaries will be permitted where: ...b) the replacement dwelling (including any curtilage development) should be no larger in scale, size or massing that the existing dwelling to be replaced and curtilage development is of a scale, form and its design must be appropriate to the location...	For clarity	Friends of the Lake District/CBC
173	Policy H21PU, criterion a	The siting of the caravan will not result in unacceptable harm adverse impacts upon the landscape, heritage assets , or biodiversity or cause visual harm	To ensure the Plan puts forward a positive strategy for the conservation and enhancement of the historic environment. The word “unacceptable” will ensure consistency with	Historic England/CBC

			other policies in the Local Plan.	
177	Policy SC1PU, bullet 10	Producing a Health and Impact Assessment and Equalities Impact Assessment to support the Local Plan which identifies the impacts of the policies within it on health and equality	Not required - This is more of a statement of what action the Council will take rather than a criterion that developers must take into account when considering proposals	CBC/CCC
177	Policy SC1PU, new sentence after list of bullets	The Council will seek developer contributions where appropriate towards new or improved sports, recreational and community facilities taking into account needs identified within its Sports and Playing Pitch Strategies and other relevant documents.	For clarity	CCC/CBC
182	Policy SC2PU, Existing facilities section	Applicants must demonstrate that: <ul style="list-style-type: none"> a) The loss is required to in order to provide alternative sport or leisure provision and the needs for the new facility clearly outweigh the loss; The development is for alternative sports and recreation provision, the benefits of which clearly outweigh the loss of the current or former use or b) An assessment has been undertaken which clearly shows the existing facility is surplus to requirements; or c) The land in question only forms an ancillary use and its loss would not affect overall public usage of the facility; or d) c) The facility would be replaced by equivalent or better provision in terms of quantity and quality, with equivalent or better access and management arrangements within a suitable location. 	For clarity and to ensure conformity with the NPPF, paragraph 99	Sport England/CBC

186/7	Policy SC5PU, criterion a	Its continued use as a community or cultural facility is no longer feasible, having had regard to appropriate marketing that has been undertaken . Evidence should be provided to show that the building premises/site has been marketed over a 12 month period through recognised agents and online platforms appropriate to the nature of the facility at a price which reflects its use, condition and local market values), the demand for the use of the site or premises, and its usability and the identification of a potential future occupier . Applicants must demonstrate that full consideration has been given any opportunities available to retain the existing use as part of a shared/combined service in order to improve viability. Applicants must also identify the proposed future occupier of the site to avoid speculative applications.	To ensure all viable options have been considered and exhausted before the site is lost to an alternative use.	Friends of the Lake District/CBC
213	Policy N13PU, second sentence	Developers should be encouraged to incorporate additional tree planting and hedgerows into new developments where possible and appropriate.	To increase tree planting in the borough, to ensure alignment with Policy N1	Friends of the Lake District/CBC
213	Policy N13PU, criterion 2	Replacement trees should be planted on site and with native species should be used where possible. Where this is inappropriate or unviable, off site provision or alternative species would be considered	For clarity	Friends of the Lake District/CBC
239	Policy CO4PU, criterion c	Proposals that make provision for electric vehicles, including electric bicycles and scooters	For clarity	CBC
	Policy CO7PU, first sentence	Proposals for new development will be required to provide adequate parking provision, including cycle parking and accessible parking bays in accordance with...	For clarity	Sport England/CBC

H8PU - Affordable Housing

Following a re-reading of the NPPF we think our current affordable housing proportions are probably in conflict, so we've upped the proportion of first homes to 25%. However, as the SHMA highlights the need for affordable and social rented we are keeping that proportion.

The new breakdown of affordable housing is the following:

- **25% First Homes**
- **15% ~~40%~~ discounted market sales housing, starter homes or other affordable home ownership routes^[1] (~~25% of these must meet the definition of First Homes~~).**
- 60% affordable or social rented.

If possible, would you be able to test the different proportions of market rate discount on first homes (30%, 40%, and 50%). Just to see if we can get more value from having to up the first homes proportion.

Allocation yield changes

HWH1 - Estimated yield now 47.5 dwellings (following site boundary changes)

^[1] As defined in the NPPF Glossary

APPENDIX 4

ALTERNATIVE MIX CONSTRUCTION COSTS

Residential Mixes

Scheme				Copeland Local Plan 2021-2038						09/02/2022
Location				Copeland						3
Planning Authority				Copeland Borough Council						

Typology Mix

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211	
					15%	20%	20%	35%	5%	5%	
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127	0	19	26	26	44	6	6	127nr
Whitehaven	HWH2	Red Lonning and Harras Moor	370	0	56	74	74	130	18	18	370nr
Whitehaven	HWH4	Land south and west of St Mary's School	60	0	9	12	12	21	3	3	60nr
Whitehaven	HWH5	Former Marchon Site North*	532	0	80	106	106	186	27	27	532nr
Cleator Moor	HCM1	Land at Jacktrees Road	127	0	19	26	26	44	6	6	127nr
Cleator Moor	HCM2	Land north of Dent Road	96	0	14	19	19	34	5	5	96nr
Cleator Moor	HCM3	Former Ehenside School	40	0	6	8	8	14	2	2	40nr
Egremont	HEG1	Land north of Ashlea Road	108	0	16	22	22	38	5	5	108nr
Egremont	HEG2	Land at Gulley Flatts	170	0	25	33	34	60	9	9	170nr
Egremont	HEG3	Land to south of Daleview Gardens	141	0	21	29	28	49	7	7	141nr
Millom	HMI1	Land west of Grammerscroft	107	0	16	22	22	37	5	5	107nr
Millom	HMI2	Moor Farm	195	0	29	39	39	68	10	10	195nr
Arlecdon	HAR01	Land East of Arlecdon Road	37	0	6	7	7	13	2	2	37nr
Distington	HDI1	Land south of Prospect Works	30	0	4	5	6	11	2	2	30nr
Distington	HDI2	Land south west of Rectory Place	30	0	4	5	6	11	2	2	30nr
St Bees	HSB1	Land adjacent Abbots Court	58	0	9	12	11	20	3	3	58nr
St Bees	HSB3	Fairladies extension	30	0	4	5	6	11	2	2	30nr
Seascale	HSE2	Fairways Extension	22	0	3	5	4	8	1	1	22nr
Seascale	HSE3	Town End Farm East	32	0	5	6	6	11	2	2	32nr
Thornhill	HTH1	Land South of Thornhill	20	0	3	4	4	7	1	1	20nr
Beckermet	HBE1	Land north of Crofthouse Farm	46	0	7	10	9	16	2	2	46nr
Beckermet	HBE2	Land adjacent to Mill Fields	27	0	4	6	6	9	1	1	27nr
Bigrigg	HBI1	Land north of Springfield Gardens	65	0	10	13	13	23	3	3	65nr
Bigrigg	HBI2	Land west of Jubilee Gardens	35	0	5	7	7	12	2	2	35nr
Drigg	HDH2	Wray Head, Station Road	22	0	3	5	4	8	1	1	22nr
Holmrook	HDH3	Hill Farm Holmrook	20	0	3	4	4	7	1	1	20nr
Moor Row	HMR1	Land to north of social club	37	0	6	7	7	13	2	2	37nr
Moor Row	HMR2	Land to south of Scalegill Road	41	0	6	9	8	14	2	2	41nr
Lowca	HLO1	Solway Road	22	0	3	5	4	8	1	1	22nr
Summergrove	HSU1	Land to South West of Summergrove	80	0	12	16	16	28	4	4	80nr

Generic Sites

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211	
Generic Sites	Generic Sites	Generic Sites	5	0		2		3	0	0	5nr
Generic Sites	Generic Sites	Generic Sites	10	0	2	2	3	3	0	0	10nr

Base Build Costs

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Base Costs	Adjustment for Development Size	Re-based Costs
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211			
				0%	15%	20%	20%	35%	5%	5%			
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekeyat Rd	127		£1,164,274	£1,633,759	£1,979,013	£4,348,798	£745,936	£387,637	£10,259,417	-£307,783	£9,951,634
Whitehaven	HWH2	Red Lonning and Harras Moor	370		£3,431,544	£4,649,730	£5,632,575	£12,848,721	£2,237,808	£1,162,911	£29,963,289	-£1,498,164	£28,465,124
Whitehaven	HWH4	Land south and west of St Mary's School	60		£551,498	£754,101	£913,391	£2,075,563	£372,968	£193,818	£4,861,339	£0	£4,861,339
Whitehaven	HWH5	Former Marchon Site North*	532		£4,902,206	£6,660,376	£8,068,283	£18,383,555	£3,356,712	£1,744,366	£43,115,499	-£2,155,775	£40,959,724
Cleator Moor	HCM1	Land at Jacktrees Road	127		£1,164,274	£1,633,759	£1,979,013	£4,348,798	£745,936	£387,637	£10,259,417	-£307,783	£9,951,634
Cleator Moor	HCM2	Land north of Dent Road	96		£857,886	£1,193,930	£1,446,202	£3,360,435	£621,613	£323,031	£7,803,097	£0	£7,803,097
Cleator Moor	HCM3	Former Ehenside School	40		£367,665	£502,771	£608,927	£1,383,708	£248,645	£129,212	£3,240,929	£0	£3,240,929
Egremont	HEG1	Land north of Ashlea Road	108		£980,441	£1,382,429	£1,674,549	£3,755,780	£621,613	£323,031	£8,737,843	-£262,135	£8,475,708
Egremont	HEG2	Land at Gulley Flatts	170		£1,531,939	£2,073,588	£2,587,940	£5,930,179	£1,118,904	£581,455	£13,824,006	-£414,720	£13,409,286
Egremont	HEG3	Land to south of Daleview Gardens	141		£1,286,829	£1,822,258	£2,131,245	£4,842,980	£870,259	£452,243	£11,405,812	-£342,174	£11,063,638
Millom	HMI1	Land west of Grammerscroft	107		£980,441	£1,382,429	£1,674,549	£3,656,944	£621,613	£323,031	£8,639,007	-£259,170	£8,379,837
Millom	HMI2	Moor Farm	195		£1,777,050	£2,450,585	£2,968,519	£6,720,870	£1,243,226	£646,062	£15,806,311	-£474,189	£15,332,122
Arlecdon	HAR01	Land East of Arlecdon Road	37		£367,665	£439,938	£532,811	£1,284,872	£248,645	£129,212	£3,003,144	£0	£3,003,144
Distington	HDI1	Land south of Prospect Works	30		£245,110	£314,272	£456,695	£1,087,200	£248,645	£129,212	£2,481,135	£0	£2,481,135
Distington	HDI2	Land south west of Rectory Place	30		£245,110	£314,272	£456,695	£1,087,200	£248,645	£129,212	£2,481,135	£0	£2,481,135
St Bees	HSB1	Land adjacent Abbots Court	58		£551,498	£754,101	£837,275	£1,976,726	£372,968	£193,818	£4,686,387	£0	£4,686,387
St Bees	HSB3	Fairladies extension	30		£245,110	£314,272	£456,695	£1,087,200	£248,645	£129,212	£2,481,135	£0	£2,481,135
Seascale	HSE2	Fairways Extension	22		£183,833	£314,272	£304,464	£790,691	£124,323	£64,606	£1,782,188	£89,109	£1,871,297
Seascale	HSE3	Town End Farm East	32		£306,388	£377,105	£456,695	£1,087,200	£248,645	£129,212	£2,605,245	£0	£2,605,245
Thornhill	HTH1	Land South of Thornhill	20		£183,833	£251,440	£304,464	£691,854	£124,323	£64,606	£1,620,519	£81,026	£1,701,545
Beckermet	HBE1	Land north of Crothouse Farm	46		£428,943	£628,436	£685,043	£1,581,381	£248,645	£129,212	£3,701,661	£0	£3,701,661
Beckermet	HBE2	Land adjacent to Mill Fields	27		£245,110	£377,105	£456,695	£889,527	£124,323	£64,606	£2,157,366	£0	£2,157,366
Bigrigg	HBI1	Land north of Springfield Gardens	65		£612,776	£816,934	£989,506	£2,273,235	£372,968	£193,818	£5,259,238	£0	£5,259,238
Bigrigg	HBI2	Land west of Jubilee Gardens	35		£306,388	£439,938	£532,811	£1,186,036	£248,645	£129,212	£2,843,030	£0	£2,843,030
Drigg	HDH2	Wray Head, Station Road	22		£183,833	£314,272	£304,464	£790,691	£124,323	£64,606	£1,782,188	£89,109	£1,871,297
Holmrook	HDH3	Hill Farm Holmrook	20		£183,833	£251,440	£304,464	£691,854	£124,323	£64,606	£1,620,519	£81,026	£1,701,545
Moor Row	HMR1	Land to north of social club	37		£367,665	£439,938	£532,811	£1,284,872	£248,645	£129,212	£3,003,144	£0	£3,003,144
Moor Row	HMR2	Land to south of Scalegill Road	41		£367,665	£565,603	£608,927	£1,383,708	£248,645	£129,212	£3,303,762	£0	£3,303,762
Lowca	HLO1	Solway Road	22		£183,833	£314,272	£304,464	£790,691	£124,323	£64,606	£1,782,188	£89,109	£1,871,297
Summergrove	HSU1	Land to South West of Summergrove	80		£735,331	£1,005,432	£1,217,854	£2,767,417	£497,291	£258,425	£6,481,749	£0	£6,481,749

Generic Sites

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Base Costs	Adjustment for Development Size	Re-based Costs
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211			
				0%	0%	0%	0%	0%	0%	0%			
Generic Sites	Generic Sites	Generic Sites	5			£125,774		£296,509			£422,283	£31,671	£453,954
Generic Sites	Generic Sites	Generic Sites	10		£122,555	£125,774	£228,348	£296,509			£773,186	£38,659	£811,845

Garage GIFA

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Total GIA m2
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211	
				0%	15%	20%	20%	35%	5%	5%	
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127				337	680	93		1,110
Whitehaven	HWH2	Red Lonning and Harras Moor	370				959	2,010	278		3,248
Whitehaven	HWH4	Land south and west of St Mary's School	60				156	325	46		527
Whitehaven	HWH5	Former Marchon Site North*	532				1,374	2,876	418		4,668
Cleator Moor	HCM1	Land at Jacktrees Road	127				337	680	93		1,110
Cleator Moor	HCM2	Land north of Dent Road	96				246	526	77		849
Cleator Moor	HCM3	Former Ehenside School	40				104	217	31		351
Egremont	HEG1	Land north of Ashlea Road	108				285	588	77		950
Egremont	HEG2	Land at Gullely Flatts	170				441	928	139		1,508
Egremont	HEG3	Land to south of Daleview Gardens	141				363	758	108		1,229
Millom	HMI1	Land west of Grammerscroft	107				285	572	77		935
Millom	HMI2	Moor Farm	195				506	1,052	155		1,712
Arlecdon	HAR01	Land East of Arlecdon Road	37				91	201	31		323
Distington	HDI1	Land south of Prospect Works	30				78	170	31		279
Distington	HDI2	Land south west of Rectory Place	30				78	170	31		279
St Bees	HSB1	Land adjacent Abbots Court	58				143	309	46		498
St Bees	HSB3	Fairladies extension	30				78	170	31		279
Seascale	HSE2	Fairways Extension	22				52	124	15		191
Seascale	HSE3	Town End Farm East	32				78	170	31		279
Thornhill	HTH1	Land South of Thornhill	20				52	108	15		176
Beckermat	HBE1	Land north of Crofthouse Farm	46				117	247	31		395
Beckermat	HBE2	Land adjacent to Mill Fields	27				78	139	15		232
Bigrigg	HBI1	Land north of Springfield Gardens	65				169	356	46		571
Bigrigg	HBI2	Land west of Jubilee Gardens	35				91	186	31		307
Drigg	HDH2	Wray Head, Station Road	22				52	124	15		191
Holmrook	HDH3	Hill Farm Holmrook	20				52	108	15		176
Moor Row	HMR1	Land to north of social club	37				91	201	31		323
Moor Row	HMR2	Land to south of Scalegill Road	41				104	217	31		351
Lowca	HLO1	Solway Road	22				52	124	15		191
Summergrove	HSU1	Land to South West of Summergrove	80				207	433	62		702

Generic Sites

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Total GIA m2
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211	
				0%	0%	0%	0%	0%	0%	0%	
Generic Sites	Generic Sites	Generic Sites	5					46	-		46
Generic Sites	Generic Sites	Generic Sites	10				39	46	-		85

Garage Costs

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Base Costs	Uplift for Development Size	Re-based Cost
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211			
				0%	15%	20%	20%	35%	5%	5%			
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127				£127,673	£414,532	£88,449		£630,654	-£18,920	£611,734
Whitehaven	HWH2	Red Lonning and Harras Moor	370				£363,376	£1,224,755	£265,347		£1,853,477	-£92,674	£1,760,803
Whitehaven	HWH4	Land south and west of St Mary's School	60				£58,926	£197,845	£44,224		£300,995	£0	£300,995
Whitehaven	HWH5	Former Marchon Site North*	532				£520,511	£1,752,341	£398,020		£2,670,872	-£133,544	£2,537,328
Cleator Moor	HCM1	Land at Jacktrees Road	127				£127,673	£414,532	£88,449		£630,654	-£18,920	£611,734
Cleator Moor	HCM2	Land north of Dent Road	96				£93,299	£320,320	£73,707		£487,327	£0	£487,327
Cleator Moor	HCM3	Former Ehenside School	40				£39,284	£131,897	£29,483		£200,663	£0	£200,663
Egremont	HEG1	Land north of Ashlea Road	108				£108,031	£358,005	£73,707		£539,743	-£16,192	£523,551
Egremont	HEG2	Land at Gullely Flatts	170				£166,956	£565,271	£132,673		£864,901	-£25,947	£838,954
Egremont	HEG3	Land to south of Daleview Gardens	141				£137,494	£461,638	£103,190		£702,322	-£21,070	£681,252
Millom	HMI1	Land west of Grammerscroft	107				£108,031	£348,584	£73,707		£530,322	-£15,910	£514,412
Millom	HMI2	Moor Farm	195				£191,509	£640,641	£147,415		£979,564	-£29,387	£950,177
Arlecdon	HAR01	Land East of Arlecdon Road	37				£34,373	£122,475	£29,483		£186,332	£0	£186,332
Distington	HDI1	Land south of Prospect Works	30				£29,463	£103,633	£29,483		£162,579	£0	£162,579
Distington	HDI2	Land south west of Rectory Place	30				£29,463	£103,633	£29,483		£162,579	£0	£162,579
St Bees	HSB1	Land adjacent Abbots Court	58				£54,015	£188,424	£44,224		£286,664	£0	£286,664
St Bees	HSB3	Fairladies extension	30				£29,463	£103,633	£29,483		£162,579	£0	£162,579
Seascale	HSE2	Fairways Extension	22				£19,642	£75,370	£14,741		£109,753	£5,488	£115,241
Seascale	HSE3	Town End Farm East	32				£29,463	£103,633	£29,483		£162,579	£0	£162,579
Thornhill	HTH1	Land South of Thornhill	20				£19,642	£65,948	£14,741		£100,332	£5,017	£105,348
Beckermet	HBE1	Land north of Crofthouse Farm	46				£44,194	£150,739	£29,483		£224,416	£0	£224,416
Beckermet	HBE2	Land adjacent to Mill Fields	27				£29,463	£84,791	£14,741		£128,995	£0	£128,995
Bigrigg	HBI1	Land north of Springfield Gardens	65				£63,836	£216,687	£44,224		£324,748	£0	£324,748
Bigrigg	HBI2	Land west of Jubilee Gardens	35				£34,373	£113,054	£29,483		£176,911	£0	£176,911
Drigg	HDH2	Wray Head, Station Road	22				£19,642	£75,370	£14,741		£109,753	£5,488	£115,241
Holmrook	HDH3	Hill Farm Holmrook	20				£19,642	£65,948	£14,741		£100,332	£5,017	£105,348
Moor Row	HMR1	Land to north of social club	37				£34,373	£122,475	£29,483		£186,332	£0	£186,332
Moor Row	HMR2	Land to south of Scalegill Road	41				£39,284	£131,897	£29,483		£200,663	£0	£200,663
Lowca	HLO1	Solway Road	22				£19,642	£75,370	£14,741		£109,753	£5,488	£115,241
Summergrove	HSU1	Land to South West of Summergrove	80				£78,568	£263,793	£58,966		£401,327	£0	£401,327

Generic Sites

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	3 Bed Det 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Base Costs	Uplift for Development Size	Re-based Cost
				\HT112	\HS212	\HS322	\HD322	\HD422	\HD532	\BS211			
				0%	0%	0%	0%	0%	0%	0%			
Generic Sites	Generic Sites	Generic Sites	5					£28,264	£0		£28,264	£2,120	£30,383
Generic Sites	Generic Sites	Generic Sites	10				£14,731	£28,264	£0		£42,995	£2,150	£45,145

Part L Costs

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Part L Costs
				\HT112	\HS212	\HS322	\HD422	\HD532	\BS211	
				0%	15%	20%	35%	5%	5%	
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127	£0	£96,645	£132,251	£300,874	£41,028	£30,520	£779,108
Whitehaven	HWH2	Red Lonning and Harras Moor	370	£0	£284,849	£376,407	£888,946	£123,085	£91,559	£2,270,861
Whitehaven	HWH4	Land south and west of St Mary's School	60	£0	£45,779	£61,039	£143,599	£20,514	£15,260	£368,248
Whitehaven	HWH5	Former Marchon Site North*	532	£0	£406,927	£539,178	£1,271,877	£184,627	£137,338	£3,264,780
Cleator Moor	HCM1	Land at Jacktrees Road	127	£0	£96,645	£132,251	£300,874	£41,028	£30,520	£779,108
Cleator Moor	HCM2	Land north of Dent Road	96	£0	£71,212	£96,645	£232,494	£34,190	£25,433	£589,897
Cleator Moor	HCM3	Former Ehenside School	40	£0	£30,520	£40,693	£95,733	£13,676	£10,173	£245,499
Egremont	HEG1	Land north of Ashlea Road	108	£0	£81,385	£111,905	£259,846	£34,190	£25,433	£663,196
Egremont	HEG2	Land at Gulley Flatts	170	£0	£127,165	£167,857	£410,283	£61,542	£45,779	£1,045,120
Egremont	HEG3	Land to south of Daleview Gardens	141	£0	£106,818	£147,511	£335,064	£47,866	£35,606	£864,331
Millom	HMI1	Land west of Grammerscroft	107	£0	£81,385	£111,905	£253,008	£34,190	£25,433	£656,358
Millom	HMI2	Moor Farm	195	£0	£147,511	£198,377	£464,987	£68,380	£50,866	£1,196,805
Arlecdon	HAR01	Land East of Arlecdon Road	37	£0	£30,520	£35,606	£88,895	£13,676	£10,173	£226,736
Distington	HDI1	Land south of Prospect Works	30	£0	£20,346	£25,433	£75,219	£13,676	£10,173	£185,875
Distington	HDI2	Land south west of Rectory Place	30	£0	£20,346	£25,433	£75,219	£13,676	£10,173	£185,875
St Bees	HSB1	Land adjacent Abbots Court	58	£0	£45,779	£61,039	£136,761	£20,514	£15,260	£354,572
St Bees	HSB3	Fairladies extension	30	£0	£20,346	£25,433	£75,219	£13,676	£10,173	£185,875
Seascale	HSE2	Fairways Extension	22	£0	£15,260	£25,433	£54,704	£6,838	£5,087	£134,674
Seascale	HSE3	Town End Farm East	32	£0	£25,433	£30,520	£75,219	£13,676	£10,173	£196,049
Thornhill	HTH1	Land South of Thornhill	20	£0	£15,260	£20,346	£47,866	£6,838	£5,087	£122,749
Beckermet	HBE1	Land north of Crofthouse Farm	46	£0	£35,606	£50,866	£109,409	£13,676	£10,173	£281,272
Beckermet	HBE2	Land adjacent to Mill Fields	27	£0	£20,346	£30,520	£61,542	£6,838	£5,087	£165,361
Bigrigg	HBI1	Land north of Springfield Gardens	65	£0	£50,866	£66,126	£157,275	£20,514	£15,260	£398,935
Bigrigg	HBI2	Land west of Jubilee Gardens	35	£0	£25,433	£35,606	£82,057	£13,676	£10,173	£214,811
Drigg	HDH2	Wray Head, Station Road	22	£0	£15,260	£25,433	£54,704	£6,838	£5,087	£134,674
Holmrook	HDH3	Hill Farm Holmrook	20	£0	£15,260	£20,346	£47,866	£6,838	£5,087	£122,749
Moor Row	HMR1	Land to north of social club	37	£0	£30,520	£35,606	£88,895	£13,676	£10,173	£226,736
Moor Row	HMR2	Land to south of Scalegill Road	41	£0	£30,520	£45,779	£95,733	£13,676	£10,173	£250,585
Lowca	HLO1	Solway Road	22	£0	£15,260	£25,433	£54,704	£6,838	£5,087	£134,674
Summergrove	HSU1	Land to South West of Summergrove	80	£0	£61,039	£81,385	£191,465	£27,352	£20,346	£490,997

Generic Sites

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	Part L Costs
				\HT112	\HS212	\HS322	\HD422	\HD532	\BS211	
				0%	0%	0%	0%	0%	0%	
Generic Sites	Generic Sites	Generic Sites	5	£0		£10,173	£20,514	£0	£0	£30,687
Generic Sites	Generic Sites	Generic Sites	10	£0	£10,173	£10,173	£20,514	£0	£0	£61,375

Total Dwelling GIFA

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	
				\HT112	\HS212	\HS322	\HD422	\HD532	\BS211	
				0%	15%	20%	35%	5%	5%	
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127	0m2	1,330m2	2,210m2	5,280m2	1,020m2	420m2	12,470m2
Whitehaven	HWH2	Red Lonning and Harras Moor	370	0m2	3,920m2	6,290m2	15,600m2	3,060m2	1,260m2	36,420m2
Whitehaven	HWH4	Land south and west of St Mary's School	60	0m2	630m2	1,020m2	2,520m2	510m2	210m2	5,910m2
Whitehaven	HWH5	Former Marchon Site North*	532	0m2	5,600m2	9,010m2	22,320m2	4,590m2	1,890m2	52,420m2
Cleator Moor	HCM1	Land at Jacktrees Road	127	0m2	1,330m2	2,210m2	5,280m2	1,020m2	420m2	12,470m2
Cleator Moor	HCM2	Land north of Dent Road	96	0m2	980m2	1,615m2	4,080m2	850m2	350m2	9,490m2
Cleator Moor	HCM3	Former Ehenside School	40	0m2	420m2	680m2	1,680m2	340m2	140m2	3,940m2
Egremont	HEG1	Land north of Ashlea Road	108	0m2	1,120m2	1,870m2	4,560m2	850m2	350m2	10,620m2
Egremont	HEG2	Land at Gullely Flatts	170	0m2	1,750m2	2,805m2	7,200m2	1,530m2	630m2	16,805m2
Egremont	HEG3	Land to south of Daleview Gardens	141	0m2	1,470m2	2,465m2	5,880m2	1,190m2	490m2	13,875m2
Millom	HMI1	Land west of Grammerscroft	107	0m2	1,120m2	1,870m2	4,440m2	850m2	350m2	10,500m2
Millom	HMI2	Moor Farm	195	0m2	2,030m2	3,315m2	8,160m2	1,700m2	700m2	19,220m2
Arlecdon	HAR01	Land East of Arlecdon Road	37	0m2	420m2	595m2	1,560m2	340m2	140m2	3,650m2
Distington	HDI1	Land south of Prospect Works	30	0m2	280m2	425m2	1,320m2	340m2	140m2	3,015m2
Distington	HDI2	Land south west of Rectory Place	30	0m2	280m2	425m2	1,320m2	340m2	140m2	3,015m2
St Bees	HSB1	Land adjacent Abbots Court	58	0m2	630m2	1,020m2	2,400m2	510m2	210m2	5,705m2
St Bees	HSB3	Fairladies extension	30	0m2	280m2	425m2	1,320m2	340m2	140m2	3,015m2
Seascale	HSE2	Fairways Extension	22	0m2	210m2	425m2	960m2	170m2	70m2	2,175m2
Seascale	HSE3	Town End Farm East	32	0m2	350m2	510m2	1,320m2	340m2	140m2	3,170m2
Thornhill	HTH1	Land South of Thornhill	20	0m2	210m2	340m2	840m2	170m2	70m2	1,970m2
Beckermet	HBE1	Land north of Crofthouse Farm	46	0m2	490m2	850m2	1,920m2	340m2	140m2	4,505m2
Beckermet	HBE2	Land adjacent to Mill Fields	27	0m2	280m2	510m2	1,080m2	170m2	70m2	2,620m2
Bigrigg	HBI1	Land north of Springfield Gardens	65	0m2	700m2	1,105m2	2,760m2	510m2	210m2	6,390m2
Bigrigg	HBI2	Land west of Jubilee Gardens	35	0m2	350m2	595m2	1,440m2	340m2	140m2	3,460m2
Drigg	HDH2	Wray Head, Station Road	22	0m2	210m2	425m2	960m2	170m2	70m2	2,175m2
Holmrook	HDH3	Hill Farm Holmrook	20	0m2	210m2	340m2	840m2	170m2	70m2	1,970m2
Moor Row	HMR1	Land to north of social club	37	0m2	420m2	595m2	1,560m2	340m2	140m2	3,650m2
Moor Row	HMR2	Land to south of Scalegill Road	41	0m2	420m2	765m2	1,680m2	340m2	140m2	4,025m2
Lowca	HLO1	Solway Road	22	0m2	210m2	425m2	960m2	170m2	70m2	2,175m2
Summergrove	HSU1	Land to South West of Summergrove	80	0m2	840m2	1,360m2	3,360m2	680m2	280m2	7,880m2

Generic Sites

Settlement	Reference	Address	Development Size	1 Bed Terr 2 Storey	2 Bed Semi 2 Storey	3 Bed Semi 2 Storey	4 Bed Det 2 Storey	5 Bed Det 2 Storey	2 Bed Semi Bung	
				\HT112	\HS212	\HS322	\HD422	\HD532	\BS211	
				0%	0%	0%	0%	0%	0%	
Generic Sites	Generic Sites	Generic Sites	5	0m2		170m2	360m2	0m2	0m2	530m2
Generic Sites	Generic Sites	Generic Sites	10	0m2	140m2	170m2	360m2	0m2	0m2	925m2

Site Area Analysis

Settlement	Reference	Address	Development Size	GIFA		Density	Net Site Area		GIFA Ratios	
				Sq.ft	Sq.m	DpH	Acres	Sq.m	Sq.ft/acre	Sq.m/ha
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127	134,226ft2	12,470m2	32.0 units/Ha	9.81 acres	39,688m2	13,687	3,142
Whitehaven	HWH2	Red Lonning and Harras Moor	370	392,021ft2	36,420m2	30.0 units/Ha	30.48 acres	123,333m2	12,863	2,953
Whitehaven	HWH4	Land south and west of St Mary's School	60	63,615ft2	5,910m2	33.0 units/Ha	4.49 acres	18,182m2	14,159	3,251
Whitehaven	HWH5	Former Marchon Site North*	532	564,244ft2	52,420m2	36.0 units/Ha	36.52 acres	147,778m2	15,452	3,547
Cleator Moor	HCM1	Land at Jacktrees Road	127	134,226ft2	12,470m2	33.0 units/Ha	9.51 acres	38,485m2	14,115	3,240
Cleator Moor	HCM2	Land north of Dent Road	96	102,149ft2	9,490m2	30.0 units/Ha	7.91 acres	32,000m2	12,919	2,966
Cleator Moor	HCM3	Former Ehenside School	40	42,410ft2	3,940m2	38.0 units/Ha	2.60 acres	10,526m2	16,305	3,743
Egremont	HEG1	Land north of Ashlea Road	108	114,313ft2	10,620m2	30.0 units/Ha	8.90 acres	36,000m2	12,850	2,950
Egremont	HEG2	Land at Gulley Flatts	170	180,887ft2	16,805m2	33.0 units/Ha	12.73 acres	51,515m2	14,210	3,262
Egremont	HEG3	Land to south of Daleview Gardens	141	149,349ft2	13,875m2	30.0 units/Ha	11.61 acres	47,000m2	12,860	2,952
Millom	HMI1	Land west of Grammerscroft	107	113,021ft2	10,500m2	33.0 units/Ha	8.01 acres	32,424m2	14,106	3,238
Millom	HMI2	Moor Farm	195	206,882ft2	19,220m2	33.0 units/Ha	14.60 acres	59,091m2	14,169	3,253
Arlecdon	HAR01	Land East of Arlecdon Road	37	39,288ft2	3,650m2	30.0 units/Ha	3.05 acres	12,333m2	12,892	2,959
Distington	HDI1	Land south of Prospect Works	30	32,453ft2	3,015m2	30.0 units/Ha	2.47 acres	10,000m2	13,134	3,015
Distington	HDI2	Land south west of Rectory Place	30	32,453ft2	3,015m2	35.0 units/Ha	2.12 acres	8,571m2	15,323	3,518
St Bees	HSB1	Land adjacent Abbots Court	58	61,408ft2	5,705m2	35.0 units/Ha	4.09 acres	16,571m2	14,997	3,443
St Bees	HSB3	Fairladies extension	30	32,453ft2	3,015m2	30.0 units/Ha	2.47 acres	10,000m2	13,134	3,015
Seascale	HSE2	Fairways Extension	22	23,411ft2	2,175m2	30.0 units/Ha	1.81 acres	7,333m2	12,920	2,966
Seascale	HSE3	Town End Farm East	32	34,122ft2	3,170m2	30.0 units/Ha	2.64 acres	10,667m2	12,946	2,972
Thornhill	HTH1	Land South of Thornhill	20	21,205ft2	1,970m2	35.0 units/Ha	1.41 acres	5,714m2	15,018	3,448
Beckermet	HBE1	Land north of Crothouse Farm	46	48,491ft2	4,505m2	32.0 units/Ha	3.55 acres	14,375m2	13,652	3,134
Beckermet	HBE2	Land adjacent to Mill Fields	27	28,201ft2	2,620m2	30.0 units/Ha	2.22 acres	9,000m2	12,681	2,911
Bigrigg	HBI1	Land north of Springfield Gardens	65	68,781ft2	6,390m2	35.0 units/Ha	4.59 acres	18,571m2	14,988	3,441
Bigrigg	HBI2	Land west of Jubilee Gardens	35	37,243ft2	3,460m2	30.0 units/Ha	2.88 acres	11,667m2	12,919	2,966
Drigg	HDH2	Wray Head, Station Road	22	23,411ft2	2,175m2	30.0 units/Ha	1.81 acres	7,333m2	12,920	2,966
Holmrook	HDH3	Hill Farm Holmrook	20	21,205ft2	1,970m2	30.0 units/Ha	1.65 acres	6,667m2	12,872	2,955
Moor Row	HMR1	Land to north of social club	37	39,288ft2	3,650m2	32.0 units/Ha	2.86 acres	11,563m2	13,751	3,157
Moor Row	HMR2	Land to south of Scalegill Road	41	43,325ft2	4,025m2	30.0 units/Ha	3.38 acres	13,667m2	12,829	2,945
Lowca	HLO1	Solway Road	22	23,411ft2	2,175m2	30.0 units/Ha	1.81 acres	7,333m2	12,920	2,966
Summergrove	HSU1	Land to South West of Summergrove	80	84,820ft2	7,880m2	30.0 units/Ha	6.59 acres	26,667m2	12,872	2,955
Average									13,682	3,141

Generic Sites

Generic Sites

Settlement	Reference	Address	Development Size	GIFA		Density	Net Site Area		GIFA Ratios	
				Sq.ft	Sq.m	DpH	Acres	Sq.m	Sq.ft/acre	Sq.m/ha
Generic Sites	Generic Sites	Generic Sites	5	5,705ft2	530m2	30.0 units/Ha	0.41 acres	1,667m2	13,852	3,180
Generic Sites	Generic Sites	Generic Sites	10	9,957ft2	925m2	35.0 units/Ha	0.71 acres	2,857m2	14,103	3,238
Average									13,978	3,209

External Works Areas

External Works Costs

Settlement	Reference	Address	Development Size
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127
Whitehaven	HWH2	Red Lonning and Harras Moor	370
Whitehaven	HWH4	Land south and west of St Mary's School	60
Whitehaven	HWH5	Former Marchon Site North*	532
Cleator Moor	HCM1	Land at Jacktrees Road	127
Cleator Moor	HCM2	Land north of Dent Road	96
Cleator Moor	HCM3	Former Ehenside School	40
Egremont	HEG1	Land north of Ashlea Road	108
Egremont	HEG2	Land at Gullely Flatts	170
Egremont	HEG3	Land to south of Daleview Gardens	141
Millom	HMI1	Land west of Grammerscroft	107
Millom	HMI2	Moor Farm	195
Arlecdon	HAR01	Land East of Arlecdon Road	37
Distington	HDI1	Land south of Prospect Works	30
Distington	HDI2	Land south west of Rectory Place	30
St Bees	HSB1	Land adjacent Abbots Court	58
St Bees	HSB3	Fairladies extension	30
Seascale	HSE2	Fairways Extension	22
Seascale	HSE3	Town End Farm East	32
Thornhill	HTH1	Land South of Thornhill	20
Beckermet	HBE1	Land north of Crofthouse Farm	46
Beckermet	HBE2	Land adjacent to Mill Fields	27
Bigrigg	HBI1	Land north of Springfield Gardens	65
Bigrigg	HBI2	Land west of Jubilee Gardens	35
Drigg	HDH2	Wray Head, Station Road	22
Holmrook	HDH3	Hill Farm Holmrook	20
Moor Row	HMR1	Land to north of social club	37
Moor Row	HMR2	Land to south of Scalegill Road	41
Lowca	HLO1	Solway Road	22
Summergrove	HSU1	Land to South West of Summergrove	80

External Works Costs											
Clear Site	Fencing	Driveways	Paving	Front Gardens	Rear Gardens	Balance	Plot Services	Roads, Paving & Drainage	Rear Gardens	Total	
£38,183	£210,244	£183,277	£263,537	£119,327	£62,504	£5,647	£597,347	£1,302,607	£224,492	£2,782,675	
£118,657	£612,773	£533,957	£768,299	£348,182	£182,381	£60,726	£1,740,304	£3,772,951	£697,633	£8,138,229	
£17,492	£99,402	£86,588	£124,628	£56,501	£29,596	-£932	£282,211	£622,448	£102,845	£1,317,935	
£142,175	£881,510	£767,743	£1,105,148	£501,171	£262,518	-£87,649	£2,502,274	£5,424,293	£835,902	£11,499,183	
£37,026	£210,244	£183,277	£263,537	£119,327	£62,504	-£1,424	£597,347	£1,302,607	£217,689	£2,774,447	
£30,787	£159,157	£138,540	£199,672	£90,592	£47,453	£15,194	£451,538	£990,241	£181,007	£2,123,175	
£10,127	£66,268	£57,725	£83,085	£37,667	£19,730	-£9,998	£188,141	£419,022	£59,542	£871,769	
£34,635	£178,778	£155,858	£224,219	£101,506	£53,170	£17,969	£507,980	£1,109,678	£203,633	£2,383,792	
£49,562	£281,862	£245,331	£353,710	£160,558	£84,102	-£3,507	£799,599	£1,744,046	£291,395	£3,715,263	
£45,218	£233,588	£203,481	£292,667	£132,616	£69,466	£23,106	£663,197	£1,446,495	£265,855	£3,109,833	
£31,195	£177,110	£154,415	£221,995	£100,493	£52,639	-£1,113	£503,277	£1,099,181	£183,407	£2,339,192	
£56,850	£323,159	£281,410	£405,162	£183,748	£96,249	-£3,302	£917,187	£1,996,873	£334,247	£4,257,337	
£11,866	£61,341	£53,396	£76,845	£34,918	£18,290	£5,889	£174,030	£388,200	£69,763	£824,776	
£9,621	£49,924	£43,294	£62,911	£28,723	£15,045	£4,012	£141,106	£320,064	£19,057	£674,698	
£8,246	£49,924	£43,294	£62,911	£28,723	£15,045	-£4,388	£141,106	£320,064	£10,658	£664,925	
£15,943	£96,125	£83,701	£120,256	£54,533	£28,565	-£6,760	£272,804	£601,969	£21,804	£1,267,136	
£9,621	£49,924	£43,294	£62,911	£28,723	£15,045	£4,012	£141,106	£320,064	£19,057	£674,698	
£7,055	£36,452	£31,749	£45,635	£20,627	£10,805	£3,607	£103,478	£236,436	£14,412	£495,843	
£10,262	£53,160	£46,180	£66,580	£30,330	£15,887	£4,801	£150,513	£338,644	£20,688	£716,357	
£5,498	£33,134	£28,863	£41,543	£18,834	£9,865	-£2,347	£94,070	£215,596	£7,519	£445,056	
£13,830	£76,099	£66,384	£95,218	£43,036	£22,543	£2,295	£216,362	£478,921	£24,838	£1,014,689	
£8,659	£44,575	£38,964	£55,824	£25,159	£13,178	£4,939	£126,995	£285,477	£18,118	£603,770	
£17,867	£107,583	£93,803	£134,893	£61,089	£31,999	-£7,352	£305,729	£672,005	£24,647	£1,417,616	
£11,224	£58,087	£50,509	£72,820	£33,079	£17,327	£5,418	£164,623	£369,466	£22,745	£782,554	
£7,055	£36,452	£31,749	£45,635	£20,627	£10,805	£3,607	£103,478	£236,436	£14,412	£495,843	
£6,414	£33,134	£28,863	£41,543	£18,834	£9,865	£3,253	£94,070	£215,596	£13,118	£451,572	
£11,124	£61,341	£53,396	£76,845	£34,918	£18,290	£1,357	£174,030	£388,200	£19,647	£819,502	
£13,148	£67,918	£59,168	£84,953	£38,448	£20,139	£6,842	£192,844	£429,365	£26,981	£912,827	
£7,055	£36,452	£31,749	£45,635	£20,627	£10,805	£3,607	£103,478	£236,436	£14,412	£495,843	
£25,656	£132,536	£115,450	£166,171	£75,335	£39,461	£13,011	£376,282	£825,874	£52,472	£1,769,775	

Generic Sites

Settlement	Reference	Address	Development Size
Generic Sites	Generic Sites	Generic Sites	5
Generic Sites	Generic Sites	Generic Sites	10

External Works Costs											
Clear Site	Fencing	Driveways	Paving	Front Gardens	Rear Gardens	Balance	Plot Services	Roads, Paving & Drainage	Rear Gardens	Total	
£1,603	£8,302	£7,216	£10,408	£4,599	£2,409	£727	£23,518	£64,348	£3,136	£123,130	
£2,749	£16,304	£14,431	£20,454	£9,120	£4,777	-£380	£47,035	£110,768	£4,397	£225,258	

Total Build Costs plus Oncosts

Settlement	Reference	Address	Development Size	Base "Box" Costs	Base Box Costs	Garages	Part L	Base Build Costs	Base Build Costs	Base Build Costs	External Works	Ext'l Works	Ext'l Works	Sub-Total	Sales Rate	Progr'm	Prelims	Prelims	Prelims	Prof'l Fees	Prof'l Fees	Cont'ncy	Cont'ncy	Total Cost	Total Cost			
				£	£/m2	£	£	£	£/m2	%	£	£/m2	%	£	£/m2	%	£	per Month	Weeks	£	£/m2	%	£	%	£	%	£	£/m2
Whitehaven	HWH1	Land at West Cumberland Hospital and St	127	£9,951,634	£798	£611,734	£779,108	£ 11,342,476	£ 910	63.2%	£ 2,782,675	£ 223	15.5%	£ 14,125,151	3.0	209	£1,843,193	£ 148	10.3%	£ 1,117,784	6.2%	£ 854,306	4.8%	£ 17,940,434	£ 1,438.69			
Whitehaven	HWH2	Red Lonning and Harras Moor	370	£28,465,124	£782	£1,760,803	£2,270,861	£ 32,496,789	£ 892	64.8%	£ 8,138,229	£ 223	16.2%	£ 40,635,018	4.0	427	£4,222,214	£ 116	8.4%	£ 2,915,720	5.8%	£ 2,388,648	4.8%	£ 50,161,599	£ 1,377.31			
Whitehaven	HWH4	Land south and west of St Mary's School	60	£4,861,339	£823	£300,995	£368,248	£ 5,530,582	£ 936	65.2%	£ 1,317,935	£ 223	15.5%	£ 6,848,517	3.0	113	£664,373	£ 112	7.8%	£ 563,467	6.6%	£ 403,818	4.8%	£ 8,480,174	£ 1,434.89			
Whitehaven	HWH5	Former Marchon Site North*	532	£40,959,724	£781	£2,537,328	£3,264,780	£ 46,761,832	£ 892	66.3%	£ 11,499,183	£ 219	16.3%	£ 58,261,016	5.0	487	£4,815,499	£ 92	6.8%	£ 4,099,973	5.8%	£ 3,358,824	4.8%	£ 70,535,312	£ 1,345.58			
Cleator Moor	HCM1	Land at Jacktrees Road	127	£9,951,634	£798	£611,734	£779,108	£ 11,342,476	£ 910	63.3%	£ 2,774,447	£ 222	15.5%	£ 14,116,923	3.0	209	£1,843,193	£ 148	10.3%	£ 1,117,208	6.2%	£ 853,866	4.8%	£ 17,931,190	£ 1,437.95			
Cleator Moor	HCM2	Land north of Dent Road	96	£7,803,097	£822	£487,327	£589,897	£ 8,880,321	£ 936	65.7%	£ 2,123,175	£ 224	15.7%	£ 11,003,496	3.0	165	£970,102	£ 102	7.2%	£ 898,020	6.6%	£ 643,581	4.8%	£ 13,515,198	£ 1,424.15			
Cleator Moor	HCM3	Former Ehenside School	40	£3,240,929	£823	£200,663	£245,499	£ 3,687,091	£ 936	64.6%	£ 871,769	£ 221	15.3%	£ 4,558,860	3.0	84	£493,870	£ 125	8.7%	£ 378,955	6.6%	£ 271,584	4.8%	£ 5,703,268	£ 1,447.53			
Egremont	HEG1	Land north of Ashlea Road	108	£8,475,708	£798	£523,551	£663,196	£ 9,662,455	£ 910	63.0%	£ 2,383,792	£ 224	15.5%	£ 12,046,247	3.0	182	£1,605,077	£ 151	10.5%	£ 955,593	6.2%	£ 730,346	4.8%	£ 15,337,263	£ 1,444.19			
Egremont	HEG2	Land at Gullely Flatts	170	£13,409,286	£798	£838,954	£1,045,120	£ 15,293,360	£ 910	63.6%	£ 3,715,263	£ 221	15.4%	£ 19,008,623	3.0	272	£2,398,797	£ 143	10.0%	£ 1,498,519	6.2%	£ 1,145,297	4.8%	£ 24,051,236	£ 1,431.20			
Egremont	HEG3	Land to south of Daleview Gardens	141	£11,063,638	£797	£681,252	£864,331	£ 12,609,222	£ 909	63.2%	£ 3,109,833	£ 224	15.6%	£ 15,719,055	3.0	230	£2,028,394	£ 146	10.2%	£ 1,242,321	6.2%	£ 949,489	4.8%	£ 19,939,259	£ 1,437.06			
Millom	HMI1	Land west of Grammerscroft	107	£8,379,837	£798	£514,412	£656,358	£ 9,550,607	£ 910	63.0%	£ 2,339,192	£ 223	15.4%	£ 11,889,799	3.0	181	£1,596,258	£ 152	10.5%	£ 944,024	6.2%	£ 721,504	4.8%	£ 15,151,585	£ 1,443.01			
Millom	HMI2	Moor Farm	195	£15,332,122	£798	£950,177	£1,196,805	£ 17,479,105	£ 909	63.6%	£ 4,257,337	£ 222	15.5%	£ 21,736,442	3.0	308	£2,716,285	£ 141	9.9%	£ 1,711,691	6.2%	£ 1,308,221	4.8%	£ 27,472,638	£ 1,429.38			
Arlecdon	HAR01	Land East of Arlecdon Road	37	£3,003,144	£823	£186,332	£226,736	£ 3,416,212	£ 936	62.2%	£ 824,776	£ 226	15.0%	£ 4,240,988	2.0	106	£623,217	£ 171	11.4%	£ 364,815	6.6%	£ 261,451	4.8%	£ 5,490,471	£ 1,504.24			
Distington	HDI1	Land south of Prospect Works	30	£2,481,135	£823	£162,579	£185,875	£ 2,829,589	£ 939	62.1%	£ 674,698	£ 224	14.8%	£ 3,504,288	2.0	91	£535,026	£ 177	11.7%	£ 302,949	6.6%	£ 217,113	4.8%	£ 4,559,375	£ 1,512.23			
Distington	HDI2	Land south west of Rectory Place	30	£2,481,135	£823	£162,579	£185,875	£ 2,829,589	£ 939	62.2%	£ 664,925	£ 221	14.6%	£ 3,494,514	2.0	91	£535,026	£ 177	11.8%	£ 302,216	6.6%	£ 216,588	4.8%	£ 4,548,343	£ 1,508.57			
St Bees	HSB1	Land adjacent Abbots Court	58	£4,686,387	£821	£286,664	£354,572	£ 5,327,622	£ 934	63.0%	£ 1,267,136	£ 222	15.0%	£ 6,594,758	2.0	152	£893,669	£ 157	10.6%	£ 561,632	6.6%	£ 402,503	4.8%	£ 8,452,562	£ 1,481.61			
St Bees	HSB3	Fairladies extension	30	£2,481,135	£823	£162,579	£185,875	£ 2,829,589	£ 939	62.1%	£ 674,698	£ 224	14.8%	£ 3,504,288	2.0	91	£535,026	£ 177	11.7%	£ 302,949	6.6%	£ 217,113	4.8%	£ 4,559,375	£ 1,512.23			
Seascale	HSE2	Fairways Extension	22	£1,871,297	£860	£115,241	£134,674	£ 2,121,212	£ 975	64.8%	£ 495,843	£ 228	15.1%	£ 2,617,055	2.0	74	£276,866	£ 127	8.5%	£ 224,279	6.9%	£ 155,910	4.8%	£ 3,274,110	£ 1,505.34			
Seascale	HSE3	Town End Farm East	32	£2,605,245	£822	£162,579	£196,049	£ 2,963,873	£ 935	61.9%	£ 716,357	£ 226	15.0%	£ 3,680,230	2.0	95	£558,543	£ 176	11.7%	£ 317,908	6.6%	£ 227,834	4.8%	£ 4,784,516	£ 1,509.31			
Thornhill	HTH1	Land South of Thornhill	20	£1,701,545	£864	£105,348	£122,749	£ 1,929,642	£ 980	64.8%	£ 445,056	£ 226	14.9%	£ 2,374,698	2.0	69	£258,159	£ 131	8.7%	£ 204,046	6.9%	£ 141,845	4.8%	£ 2,978,749	£ 1,512.06			
Beckermet	HBE1	Land north of Crofthouse Farm	46	£3,701,661	£822	£224,416	£281,272	£ 4,207,349	£ 934	62.5%	£ 1,014,689	£ 225	15.1%	£ 5,222,038	2.0	126	£740,805	£ 164	11.0%	£ 447,213	6.6%	£ 320,503	4.8%	£ 6,730,559	£ 1,494.02			
Beckermet	HBE2	Land adjacent to Mill Fields	27	£2,157,366	£823	£128,995	£165,361	£ 2,451,723	£ 936	61.1%	£ 603,770	£ 230	15.0%	£ 3,055,493	2.0	85	£499,749	£ 191	12.5%	£ 266,643	6.6%	£ 191,094	4.8%	£ 4,012,979	£ 1,531.67			
Bigrigg	HBI1	Land north of Springfield Gardens	65	£5,259,238	£823	£324,748	£398,935	£ 5,982,921	£ 936	65.4%	£ 1,417,616	£ 222	15.5%	£ 7,400,538	3.0	120	£705,528	£ 110	7.7%	£ 607,955	6.6%	£ 435,701	4.8%	£ 9,149,722	£ 1,431.88			
Bigrigg	HBI2	Land west of Jubilee Gardens	35	£2,843,030	£822	£176,911	£214,811	£ 3,234,752	£ 935	64.1%	£ 782,554	£ 226	15.5%	£ 4,017,306	3.0	77	£452,714	£ 131	9.0%	£ 335,252	6.6%	£ 240,264	4.8%	£ 5,045,536	£ 1,458.25			
Drigg	HDH2	Wray Head, Station Road	22	£1,871,297	£860	£115,241	£134,674	£ 2,121,212	£ 975	64.8%	£ 495,843	£ 228	15.1%	£ 2,617,055	2.0	74	£276,866	£ 127	8.5%	£ 224,279	6.9%	£ 155,910	4.8%	£ 3,274,110	£ 1,505.34			
Holmrook	HDH3	Hill Farm Holmrook	20	£1,701,545	£864	£105,348	£122,749	£ 1,929,642	£ 980	64.6%	£ 451,572	£ 229	15.1%	£ 2,381,214	2.0	69	£258,159	£ 131	8.6%	£ 204,551	6.9%	£ 142,196	4.8%	£ 2,986,121	£ 1,515.80			
Moor Row	HMR1	Land to north of social club	37	£3,003,144	£823	£186,332	£226,736	£ 3,416,212	£ 936	62.3%	£ 819,502	£ 225	14.9%	£ 4,235,714	2.0	106	£623,217	£ 171	11.4%	£ 364,420	6.6%	£ 261,168	4.8%	£ 5,484,518	£ 1,502.61			
Moor Row	HMR2	Land to south of Scalegill Road	41	£3,303,762	£821	£200,663	£250,585	£ 3,755,010	£ 933	62.3%	£ 912,827	£ 227	15.1%	£ 4,667,837	2.0	115	£676,131	£ 168	11.2%	£ 400,798	6.6%	£ 287,238	4.8%	£ 6,032,005	£ 1,498.63			
Lowca	HLO1	Solway Road	22	£1,871,297	£860	£115,241	£134,674	£ 2,121,212	£ 975	64.8%	£ 495,843	£ 228	15.1%	£ 2,617,055	2.0	74	£276,866	£ 127	8.5%	£ 224,279	6.9%	£ 155,910	4.8%	£ 3,274,110	£ 1,505.34			
Summergrove	HSU1	Land to South West of Summergrove	80	£6,481,749	£823	£401,327	£490,997	£ 7,374,073	£ 936	65.5%	£ 1,769,775	£ 225	15.7%	£ 9,143,848	3.0	142	£834,875	£ 106	7.4%	£ 748,404	6.6%	£ 536,356	4.8%	£ 11,263,484	£ 1,429.38			

Generic Sites

Generic Sites

Settlement	Reference	Address	Development Size	Base Build Costs	Base Build Costs	Base Build Costs	External Works	External Works	External Works	Sub-Total	Sales Rate	Programme	Prelims	Prelims	Prelims	Professional Fees	Professional Fees	Contingency	Contingency	Total Cost	Total Cost				
				£	£/m2	%	£	£/m2	%	£	£/m2	%	£	per Month	Weeks	£	£/m2	%	£	%	£	%	£	£/m2	
Generic Sites	Generic Sites	Generic Sites	5	£453,954	£857	£30,383	£30,687	£ 515,025	£ 972	63.3%	£ 123,130	£ 232	15.1%	£ 638,155	2.0	37	£79,105	£ 149	9.7%	£ 57,381	7.1%	£ 38,732	4.8%	£ 813,372	£ 1,534.66
Generic Sites	Generic Sites	Generic Sites	10	£811,845	£878	£45,145	£61,375	£ 918,365	£ 993	61.3%	£ 225,258	£ 244	15.0%	£ 1,143,623	2.0	48	£179,589	£ 194	12.0%	£ 102,549	6.9%	£ 71,288	4.8%	£ 1,497,048	£ 1,618.43

428,729
2,864,055
1,586,098

96,529 525,258
96,529 2,960,584
168,926 1,755,024

POS Costs

Total Gross Cost

Settlement	Reference	Address	Development Size	POS Requirements				20% of Gross Site Area	Net Developable Area m2	Gross Site Area m2	Net to Gross Ratio
				Acres	Hectares	Sq.m	% of Gross Site Area				
				Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127				
Whitehaven	HWH2	Red Lonning and Harras Moor	370	20.32	8.22	82,222	40.0%	41,111m2	123,333	205,556	60.00%
Whitehaven	HWH4	Land south and west of St Mary's School	60	1.12	0.45	4,545	20.0%	4,545m2	18,182	22,727	80.00%
Whitehaven	HWH5	Former Marchon Site North*	532	11.25	4.55	45,534	23.6%	38,662m2	147,778	193,312	76.45%
Cleator Moor	HCM1	Land at Jacktrees Road	127	2.98	1.20	12,048	23.8%	10,107m2	38,485	50,533	76.16%
Cleator Moor	HCM2	Land north of Dent Road	96	3.72	1.50	15,050	32.0%	9,410m2	32,000	47,050	68.01%
Cleator Moor	HCM3	Former Ehenside School	40	0.83	0.34	3,361	24.2%	2,777m2	10,526	13,887	75.80%
Egremont	HEG1	Land north of Ashlea Road	108	3.98	1.61	16,093	30.9%	10,419m2	36,000	52,093	69.11%
Egremont	HEG2	Land at Gulley Flatts	170	4.21	1.70	17,031	24.8%	13,709m2	51,515	68,546	75.15%
Egremont	HEG3	Land to south of Daleview Gardens	141	7.52	3.04	30,415	39.3%	15,483m2	47,000	77,415	60.71%
Millom	HMI1	Land west of Grammerscroft	107	2.57	1.04	10,414	24.3%	8,568m2	32,424	42,838	75.69%
Millom	HMI2	Moor Farm	195	4.71	1.90	19,046	24.4%	15,627m2	59,091	78,137	75.62%
Arlecdon	HAR01	Land East of Arlecdon Road	37	1.23	0.50	4,996	28.8%	3,466m2	12,333	17,329	71.17%
Distington	HDI1	Land south of Prospect Works	30	0.53	0.21	2,136	17.6%	2,427m2	10,000	12,136	82.40%
Distington	HDI2	Land south west of Rectory Place	30	0.53	0.21	2,143	20.0%	2,143m2	8,571	10,714	80.00%
St Bees	HSB1	Land adjacent Abbots Court	58	1.66	0.67	6,736	28.9%	4,662m2	16,571	23,308	71.10%
St Bees	HSB3	Fairladies extension	30	0.40	0.16	1,600	13.8%	2,320m2	10,000	11,600	86.21%
Seascale	HSE2	Fairways Extension	22	0.36	0.14	1,445	16.5%	1,756m2	7,333	8,778	83.54%
Seascale	HSE3	Town End Farm East	32	0.53	0.22	2,162	16.9%	2,566m2	10,667	12,829	83.15%
Thornhill	HTH1	Land South of Thornhill	20	0.35	0.14	1,429	20.0%	1,429m2	5,714	7,143	80.00%
Beckermet	HBE1	Land north of Crofthouse Farm	46	1.30	0.53	5,279	26.9%	3,931m2	14,375	19,654	73.14%
Beckermet	HBE2	Land adjacent to Mill Fields	27	0.56	0.23	2,250	20.0%	2,250m2	9,000	11,250	80.00%
Bigrigg	HBI1	Land north of Springfield Gardens	65	1.84	0.75	7,456	28.6%	5,205m2	18,571	26,027	71.35%
Bigrigg	HBI2	Land west of Jubilee Gardens	35	0.72	0.29	2,917	20.0%	2,917m2	11,667	14,583	80.00%
Drigg	HDH2	Wray Head, Station Road	22	0.34	0.14	1,362	15.7%	1,739m2	7,333	8,695	84.34%
Holmrook	HDH3	Hill Farm Holmrook	20	0.41	0.17	1,667	20.0%	1,667m2	6,667	8,333	80.00%
Moor Row	HMR1	Land to north of social club	37	0.64	0.26	2,595	18.3%	2,832m2	11,563	14,158	81.67%
Moor Row	HMR2	Land to south of Scalegill Road	41	1.06	0.43	4,295	23.9%	3,592m2	13,667	17,961	76.09%
Lowca	HLO1	Solway Road	22	0.41	0.16	1,645	18.3%	1,796m2	7,333	8,978	81.68%
Summergrove	HSU1	Land to South West of Summergrove	80	2.20	0.89	8,889	25.0%	7,111m2	26,667	35,556	75.00%

POS	POS	POS	POS	POS
£	£	Type of Play Equipment	% Cost	Per Dwelling
£ 591,438	£ 14.90	LEAP	3.3%	£ 4,657
£ 2,250,405	£ 18.25	LEAP	4.5%	£ 6,082
£ 253,650	£ 13.95	LAP	3.0%	£ 4,228
£ 2,007,600	£ 13.59	NEAP	2.8%	£ 3,774
£ 578,021	£ 15.02	LEAP	3.2%	£ 4,551
£ 513,069	£ 16.03	LAP	3.8%	£ 5,344
£ 100,179	£ 9.52	N/A	1.8%	£ 2,504
£ 614,476	£ 17.07	LEAP	4.0%	£ 5,690
£ 753,700	£ 14.63	LEAP	3.1%	£ 4,434
£ 904,473	£ 19.24	LEAP	4.5%	£ 6,415
£ 505,878	£ 15.60	LEAP	3.3%	£ 4,728
£ 843,495	£ 14.27	LEAP	3.1%	£ 4,326
£ 129,719	£ 10.52	N/A	2.4%	£ 3,506
£ 74,410	£ 7.44	N/A	1.6%	£ 2,480
£ 74,642	£ 8.71	N/A	1.6%	£ 2,488
£ 271,248	£ 16.37	LAP	3.2%	£ 4,677
£ 55,733	£ 5.57	N/A	1.2%	£ 1,858
£ 50,322	£ 6.86	N/A	1.5%	£ 2,287
£ 75,307	£ 7.06	N/A	1.6%	£ 2,353
£ 49,762	£ 8.71	N/A	1.7%	£ 2,488
£ 144,851	£ 10.08	N/A	2.2%	£ 3,149
£ 78,374	£ 8.71	N/A	2.0%	£ 2,903
£ 297,576	£ 16.02	LAP	3.3%	£ 4,578
£ 101,597	£ 8.71	N/A	2.0%	£ 2,903
£ 47,435	£ 6.47	N/A	1.4%	£ 2,156
£ 58,055	£ 8.71	N/A	1.9%	£ 2,903
£ 90,406	£ 7.82	N/A	1.6%	£ 2,443
£ 129,259	£ 9.46	N/A	2.1%	£ 3,153
£ 57,297	£ 7.81	N/A	1.7%	£ 2,604
£ 383,437	£ 14.38	LAP	3.4%	£ 4,793

Total Gross Cost		
£	£/m2	Average cost per Dwelling
£ 18,531,873	£ 1,486.12	£ 145,920
£ 52,412,004	£ 1,439.10	£ 141,654
£ 8,733,825	£ 1,477.80	£ 145,564
£ 72,542,913	£ 1,383.88	£ 136,359
£ 18,509,212	£ 1,484.30	£ 145,742
£ 14,028,268	£ 1,478.22	£ 146,128
£ 5,803,448	£ 1,472.96	£ 145,086
£ 15,951,739	£ 1,502.05	£ 147,701
£ 24,804,936	£ 1,476.04	£ 145,911
£ 20,843,732	£ 1,502.25	£ 147,828
£ 15,657,464	£ 1,491.19	£ 146,331
£ 28,316,133	£ 1,473.26	£ 145,211
£ 5,620,190	£ 1,539.78	£ 151,897
£ 4,633,786	£ 1,536.91	£ 154,460
£ 4,622,986	£ 1,533.33	£ 154,100
£ 8,723,810	£ 1,529.15	£ 150,411
£ 4,615,108	£ 1,530.72	£ 153,837
£ 3,324,432	£ 1,528.47	£ 151,111
£ 4,859,822	£ 1,533.07	£ 151,869
£ 3,028,511	£ 1,537.32	£ 151,426
£ 6,875,410	£ 1,526.17	£ 149,465
£ 4,091,354	£ 1,561.59	£ 151,532
£ 9,447,298	£ 1,478.45	£ 145,343
£ 5,147,132	£ 1,487.61	£ 147,061
£ 3,321,545	£ 1,527.15	£ 150,979
£ 3,044,176	£ 1,545.27	£ 152,209
£ 5,574,924	£ 1,527.38	£ 150,674
£ 6,161,264	£ 1,530.75	£ 150,275
£ 3,331,406	£ 1,531.68	£ 151,428
£ 11,646,921	£ 1,478.04	£ 145,587

Generic Sites

Generic Sites

Settlement	Reference	Address	Development Size	POS Requirements				20% of Gross Site Area	Net Developable Area m2	Gross Site Area m2	Net to Gross Ratio
				Acres	Hectares	Sq.m	% of Gross Site Area				
				Generic Sites	Generic Sites	Generic Sites	5				
Generic Sites	Generic Sites	Generic Sites	10	0.07	0.03	286	9.1%	629m2	2,857	3,143	90.91%

POS	POS	POS	POS	POS
£	£	Type of Play Equipment	% Cost	Per Dwelling
£ 0	£ 0.00	N/A	0.0%	£ 0
£ 9,952	£ 3.48	N/A	0.7%	£ 995

Total Gross Cost		
£	£/m2	Average cost per Dwelling
£ 813,372	£ 1,534.66	£ 162,674
£ 1,507,001	£ 1,629.19	£ 150,700

Variant Optional Costs

Settlement	Reference	Address	Development Size	EV Charging Points	
				£581/dwelling	£/m2
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekyeat Rd	127	£73,848	£ 5.92
Whitehaven	HWH2	Red Lonning and Harras Moor	370	£215,147	£ 5.91
Whitehaven	HWH4	Land south and west of St Mary's School	60	£34,889	£ 5.90
Whitehaven	HWH5	Former Marchon Site North*	532	£309,347	£ 5.90
Cleator Moor	HCM1	Land at Jacktrees Road	127	£73,848	£ 5.92
Cleator Moor	HCM2	Land north of Dent Road	96	£55,822	£ 5.88
Cleator Moor	HCM3	Former Ehenside School	40	£23,259	£ 5.90
Egremont	HEG1	Land north of Ashlea Road	108	£62,800	£ 5.91
Egremont	HEG2	Land at Gullely Flatts	170	£98,851	£ 5.88
Egremont	HEG3	Land to south of Daleview Gardens	141	£81,989	£ 5.91
Millom	HMI1	Land west of Grammerscroft	107	£62,218	£ 5.93
Millom	HMI2	Moor Farm	195	£113,388	£ 5.90
Arlecdon	HAR01	Land East of Arlecdon Road	37	£21,515	£ 5.89
Distington	HDI1	Land south of Prospect Works	30	£17,444	£ 5.79
Distington	HDI2	Land south west of Rectory Place	30	£17,444	£ 5.79
St Bees	HSB1	Land adjacent Abbots Court	58	£33,726	£ 5.91
St Bees	HSB3	Fairladies extension	30	£17,444	£ 5.79
Seascale	HSE2	Fairways Extension	22	£12,793	£ 5.88
Seascale	HSE3	Town End Farm East	32	£18,607	£ 5.87
Thornhill	HTH1	Land South of Thornhill	20	£11,630	£ 5.90
Beckermet	HBE1	Land north of Crofthouse Farm	46	£26,748	£ 5.94
Beckermet	HBE2	Land adjacent to Mill Fields	27	£15,700	£ 5.99
Bigrigg	HBI1	Land north of Springfield Gardens	65	£37,796	£ 5.91
Bigrigg	HBI2	Land west of Jubilee Gardens	35	£20,352	£ 5.88
Drigg	HDH2	Wray Head, Station Road	22	£12,793	£ 5.88
Holmrook	HDH3	Hill Farm Holmrook	20	£11,630	£ 5.90
Moor Row	HMR1	Land to north of social club	37	£21,515	£ 5.89
Moor Row	HMR2	Land to south of Scalegill Road	41	£23,841	£ 5.92
Lowca	HLO1	Solway Road	22	£12,793	£ 5.88
Summergrove	HSU1	Land to South West of Summergrove	80	£46,518	£ 5.90

Generic Sites

Settlement	Reference	Address	Development Size	EV Charging Points	
				£581/dwelling	£/m2
Generic Sites	Generic Sites	Generic Sites	5	£2,907	£ 5.49
Generic Sites	Generic Sites	Generic Sites	10	£5,815	£ 6.29

Base Build Cost Comparable to BCIS 4Q21 (excluding Garages and Part L)

Settlement	Reference	Address	Development Size	Sales Rate per Month	Variance							
					KM	BCIS Lower Quartile (after reduction for O/H&P and Scale)	Variance		BCIS Median (after reduction for O/H&P and Scale)	Variance		
							£/m2	£ 1,080 /m2		£/m2	%	£ 1,203 /m2
Whitehaven	HWH1	Land at West Cumberland Hospital and Snekeyat Rd	127	3.0	£ 946	£ 972	-£ 26	-2.7%	£ 1,083	-£ 137	-12.6%	
Whitehaven	HWH2	Red Lonning and Harras Moor	370	4	£ 898	£ 972	-£ 74	-7.7%	£ 1,083	-£ 185	-17.1%	
Whitehaven	HWH4	Land south and west of St Mary's School	60	3	£ 935	£ 972	-£ 37	-3.8%	£ 1,083	-£ 148	-13.6%	
Whitehaven	HWH5	Former Marchon Site North*	532	5	£ 873	£ 972	-£ 99	-10.2%	£ 1,083	-£ 209	-19.3%	
Cleator Moor	HCM1	Land at Jacktrees Road	127	3	£ 946	£ 972	-£ 26	-2.7%	£ 1,083	-£ 137	-12.6%	
Cleator Moor	HCM2	Land north of Dent Road	96	3	£ 924	£ 972	-£ 48	-4.9%	£ 1,083	-£ 158	-14.6%	
Cleator Moor	HCM3	Former Ehenside School	40	3	£ 948	£ 972	-£ 24	-2.5%	£ 1,083	-£ 135	-12.4%	
Egremont	HEG1	Land north of Ashlea Road	108	3	£ 949	£ 972	-£ 23	-2.3%	£ 1,083	-£ 133	-12.3%	
Egremont	HEG2	Land at Gullely Flatts	170	3	£ 941	£ 972	-£ 31	-3.2%	£ 1,083	-£ 142	-13.1%	
Egremont	HEG3	Land to south of Daleview Gardens	141	3	£ 944	£ 972	-£ 28	-2.9%	£ 1,083	-£ 139	-12.9%	
Millom	HMI1	Land west of Grammerscroft	107	3	£ 950	£ 972	-£ 22	-2.3%	£ 1,083	-£ 133	-12.2%	
Millom	HMI2	Moor Farm	195	3	£ 939	£ 972	-£ 33	-3.4%	£ 1,083	-£ 144	-13.3%	
Arlecdon	HAR01	Land East of Arlecdon Road	37	2	£ 994	£ 972	£ 22	2.2%	£ 1,083	-£ 89	-8.2%	
Distington	HDI1	Land south of Prospect Works	30	2	£ 1,000	£ 972	£ 28	2.9%	£ 1,083	-£ 82	-7.6%	
Distington	HDI2	Land south west of Rectory Place	30	2	£ 1,000	£ 972	£ 28	2.9%	£ 1,083	-£ 82	-7.6%	
St Bees	HSB1	Land adjacent Abbots Court	58	2	£ 978	£ 972	£ 6	0.6%	£ 1,083	-£ 105	-9.7%	
St Bees	HSB3	Fairladies extension	30	2	£ 1,000	£ 972	£ 28	2.9%	£ 1,083	-£ 82	-7.6%	
Seascale	HSE2	Fairways Extension	22	2	£ 988	£ 972	£ 16	1.6%	£ 1,083	-£ 95	-8.8%	
Seascale	HSE3	Town End Farm East	32	2	£ 998	£ 972	£ 26	2.7%	£ 1,083	-£ 85	-7.8%	
Thornhill	HTH1	Land South of Thornhill	20	2	£ 995	£ 972	£ 23	2.3%	£ 1,083	-£ 88	-8.1%	
Beckermet	HBE1	Land north of Crofthouse Farm	46	2	£ 986	£ 972	£ 14	1.5%	£ 1,083	-£ 97	-8.9%	
Beckermet	HBE2	Land adjacent to Mill Fields	27	2	£ 1,014	£ 972	£ 42	4.3%	£ 1,083	-£ 69	-6.3%	
Bigrigg	HBI1	Land north of Springfield Gardens	65	3	£ 933	£ 972	-£ 39	-4.0%	£ 1,083	-£ 149	-13.8%	
Bigrigg	HBI2	Land west of Jubilee Gardens	35	3	£ 953	£ 972	-£ 19	-2.0%	£ 1,083	-£ 130	-12.0%	
Drigg	HDH2	Wray Head, Station Road	22	2	£ 988	£ 972	£ 16	1.6%	£ 1,083	-£ 95	-8.8%	
Holmrook	HDH3	Hill Farm Holmrook	20	2	£ 995	£ 972	£ 23	2.3%	£ 1,083	-£ 88	-8.1%	
Moor Row	HMR1	Land to north of social club	37	2	£ 994	£ 972	£ 22	2.2%	£ 1,083	-£ 89	-8.2%	
Moor Row	HMR2	Land to south of Scalegill Road	41	2	£ 989	£ 972	£ 17	1.7%	£ 1,083	-£ 94	-8.7%	
Lowca	HLO1	Solway Road	22	2	£ 988	£ 972	£ 16	1.6%	£ 1,083	-£ 95	-8.8%	
Summergrove	HSU1	Land to South West of Summergrove	80	3	£ 929	£ 972	-£ 43	-4.5%	£ 1,083	-£ 154	-14.2%	
Average								-0.8%	Average			-11.0%

Generic Sites

Settlement	Reference	Address	Development Size	Sales Rate per Month	Variance							
					KM	BCIS Lower Quartile (after reduction for O/H&P and Scale)	Variance		BCIS Median (after reduction for O/H&P and Scale)	Variance		
							£/m2	£ 1,080 /m2		£/m2	%	£ 1,203 /m2
Generic Sites	Generic Sites	Generic Sites	5	2	£ 1,006	£ 972	£ 34	3.5%	£ 1,083	-£ 77	-7.1%	
Generic Sites	Generic Sites	Generic Sites	10	2	£ 1,072	£ 972	£ 100	10.3%	£ 1,083	-£ 11	-1.0%	
Average								6.9%	Average			-4.1%

Rate Assumptions

Tender Price Index			
			Index
Start Date		31/12/2021	344
Estimating Base Date		09/04/2021	328
Increase (%)			4.88%

Location Price Index			
			Index
Copeland		31/12/2021	101
North West generally (location for base costs)		09/04/2021	99
Increase (%)			2.02%

Total Uplift			
			Index
TPI			4.88%
Location			2.02%
Increase (%)			6.90%

Development Size - Scale Factors	Nr of Dwellings	% Adjustment
Small project	<10	7.50%
Small/Medium project	10 to 25	5.00%
Medium project	25 to 100	0.00%
Medium/Large project	100 to 250	-3.00%
Large project	>250	-5.00%

PRELIMINARIES				
	Nr of Dwellings	£/week	%	£/week
Prelims small project	<10	£2,000/week	6.90%	£2,138/week
Small/Medium project	10 to 25	£3,500/week	6.90%	£3,741/week
Prelims medium project	25 to 100	£5,500/week	6.90%	£5,879/week
Medium/Large project	100 to 250	£8,250/week	6.90%	£8,819/week
Prelims large project	>250	£9,250/week	6.90%	£9,888/week

PROFESSIONAL FEES		
	Nr of Dwellings	%
Fees small project	<10	8.00%
Small/Medium project	10 to 25	7.75%
Fees medium project	25 to 100	7.50%
Medium/Large project	100 to 250	7.00%
Fees large project	>250	6.50%

Contingency	5.00%
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POS % of Nett Plot size	33.33%
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BCIS Average Rates Reduction	10.00%
OH&P Scale	10.00%