Matter 15 Housing Allocations

Issue – Whether the proposed housing allocations and broad locations are justified, effective and consistent with national policy?

Relevant Policies: SP H4PU; H5PU

Site Selection

- 15.1 Was the methodology used to assess and select the proposed site allocations and broad locations appropriate? Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear and where is this set out?
- 15.1.1 The methodology used to assess and select sites for allocation and broad location is set out in section 8 of the Settlement Hierarchy and Development Strategy Update 2021 document (EB1). It follows the guidance contained in the NPPG¹ (Housing and Economic Land Availability Assessment).
- 15.1.2 The NPPG (paragraph 8)² states that "the assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land.". The Council considered all land within and adjoining the edges of settlements within the settlement hierarchy through the SHLAA process and assessed sites for their availability, suitability and achievability to determine whether sites were deliverable or developable. Non-developable sites are not considered to be reasonable alternatives either because they are not suitable for development or available.
- 15.1.3 There were however a number of sites which were suitable and available but were considered to be more constrained and therefore less preferable than the chosen housing allocations. The reasons for rejecting such sites are listed in the Discounted Sites document (EB40). Discounted sites were also considered through the Integrated Assessment of the Preferred Options Draft³. This accords with the SEA Directive which requires that '...the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographic scope of the plan or programme, are identified, described and evaluated' (Article 5.1)

Distribution of Housing (Policy SP H4PU)

- 15.2 Is the proposed distribution of housing set out in Policy SP H4PU consistent with the settlement hierarchy set out in Policy DS3PU? How were the proportions/amounts of development for each tier of the hierarchy of settlements arrived at?
- 15.2.1 The distribution of housing set out in Policy H4 is consistent with the settlement hierarchy as the majority of homes (70%) are directed to Copeland's towns. These are considered to be the most sustainable parts of the borough with the greatest number of services. The percentage of housing development reduces as one goes down each tier of the hierarchy. This reflects the role of each tier and the level of services it offers.

¹ https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment

² ID: 3-008-20190722

³ https://www.copeland.gov.uk/attachments/integrated-assessment-report

- 15.2.2 The starting point when developing the proportions of development for each tier was the Core Strategy⁴. Paragraph 3.5.7 of the Core Strategy directs the following amounts of development to each tier⁵:
 - Whitehaven at least 45%
 - Cleator Moor at least 10%
 - Egremont at least 10%
 - Millom at least 10%
 - Local Centres not more than 20% (in combination)
- 15.2.3 Table 4 of the Development Strategy and Settlement Hierarchy Paper 2020⁶, which supported the Preferred Options Draft of the Local Plan, considers delivery against these broad targets. It showed that more development was being delivered in Whitehaven than the 45% target which suggested the amount directed to the town should be increased. However as the amount of housing is now being spread over a greater number of tiers (and settlements) in the Local Plan, and given the fact that the percentages identified are not ceilings/maximum figures, a slightly lower figure of 40% was considered to be appropriate.
- 15.2.4 The percentage directed to the Key Service Centres remains the same as in the Core Strategy. Although delivery against this figure has been low (23%) as set out in Table 4, the Council does not consider it appropriate to lower the amount of development directed to these towns as each would then receive less than 10% of development.
- 15.2.5 Further information regarding the methodology used, and the alternatives considered, can be found in Section 9 of the Development Strategy and Settlement Hierarchy Paper 2020⁶.
- 15.2.6 An amendment to the methodology was made between Preferred Options and Publication Draft stages. The updated methodology, which sees small changes in the figures for the Local Service Centres and Sustainable Rural Villages is discussed in Section 6 of the Settlement Hierarchy and Development Strategy Update 2022 (EB1).

Housing Allocations (Policy SP H5PU)

NB. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc

Taking each of the following proposed housing allocations individually.

- 15.3 What is the background to the site allocation? How was it identified and which options were considered?
- 15.3.1 Please see Appendix A below in relation to each individual allocation.
- 15.4 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 15.4.1 Please see Appendix A below in relation to each individual allocation.

⁴ https://www.copeland.gov.uk/sites/default/files/attachments/copeland_local_plan_2013_2028.pdf

⁵ Please note that there are a smaller number of tiers within the Core Strategy hierarchy than the Local Plan Hierarchy, this is discussed further in the Settlement Hierarchy and Development Strategy Update 2021 (EB1)

⁶ https://www.copeland.gov.uk/sites/default/files/attachments/development_strategy_paper.pdf

- 15.5 How were the site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?
- 15.5.1 Please see Appendix A below in relation to each individual allocation.
- 15.6 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?
- 15.6.1 Please see Appendix A below in relation to each individual allocation. There may be additional infrastructure requirements for example, the developer may need to provide contributions towards education provision, sports provision and additional open space where viability allows. This will be considered at the time of any planning application taking into account evidence such as the Viability Study (EB19, EB20, EB44), Open Space Assessment (EB28), Education Topic Paper and the Playing Pitch Strategy once it has been published.
- 15.6.2 Please also note that Appendix F of the Local Plan contains the Housing Allocation Profiles which identifies any known current or potential constraints to the delivery of housing on the identified allocation sites. These constraints have been identified using evidence base documents, responses to consultations, stakeholder engagement and site visits undertaken by Council Planning Officers. Below is a summary of the findings from Appendix F (and any other source), with the relevant page number noted.
- 15.6.3 In response to comments received during the consultation on the Local Plan Publication Draft the Council is suggesting a number of modifications to update Appendix F. Suggested modifications can be found in the Suggested Main and Minor Modifications to the Local Plan Appendices Document (CD16 and CD17).
- 15.6.4 The Council considers that the Local Plan policies and the identified mitigation measures are suitable and will be effective in successfully delivering development on the site in a way which minimises impact and will seek to provide social, economic and environmental improvements where possible.
- 15.6.5 Policy H6PU applies to all housing allocations. It recognises that any new housing development will create some level of impact, and the purpose of this policy (in conjunction with other Local Plan policies) is to minimise any detrimental impact upon existing communities and to ensure development is built to a high standard.

15.7 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 15.7.1 Please see Appendix A below in relation to each individual allocation.
- 15.7.2 The Council is committed to seeking developer contributions to enhance existing, or to provide new, infrastructure where necessary as a result of development through Local Plan Policy DS5PU.
- 15.7.3 Presently Cumbria is a two tier authority area; as a result of this Copeland Borough Council is the responsible authority for infrastructure such as affordable housing, green infrastructure, biodiversity net gain and electric vehicle charging infrastructure with Cumbria County Council

- as the authority responsible for infrastructure such as highways and transport, education and Adult Social Care.
- 15.7.4 Copeland Borough Council currently work with the County Council to secure necessary developer contributions through s106 and s278 planning contributions. Following Local Government Reorganisation in April 2023, the provision of all types of Local Authority infrastructure will be under the remit of Cumberland Council and there may be an opportunity to explore the introduction of a Community Infrastructure Levy to secure future contributions.
- 15.7.5 The Council has prepared an Infrastructure Delivery Plan (Evidence Base Documents EB21, EB22 and EB43) which identifies the key infrastructure required to support the growth identified in the emerging Local Plan and to support the development of sustainable communities. This is a 'living' document and will be updated at appropriate stages throughout the plan period to respond to changes in infrastructure requirements.
- 15.7.6 A Viability Study (Evidence Base Documents EB19, EB20 and EB44) has also been produced; this assesses how the infrastructure requirements could affect the viability and deliverability of the emerging Local Plan policies and allocations. Different scenarios have been tested to provide an assessment of the overall viability of development in the Borough and provides conclusions about 'whole plan viability'. It has been used by the Council to ensure that planning policies can deliver sustainable development without putting the delivery of the Local Plan at risk.

15.8 Is the development proposed viable and deliverable within the plan period?

- 15.8.1 Please see Appendix A below in relation to each individual allocation.
- 15.9 What is the situation in relation to land ownership and developer interest?
- 15.9.1 Please see Appendix A below in relation to each individual allocation.
- 15.10 What is the expected timescale and rate of development and is this realistic?
- 15.10.1 Please see Appendix A below in relation to each individual allocation.

Broad locations (para 13.8)

15.11 What status do the broad locations identified at paragraph 13.8 have? Where are they identified?

- 15.11.1 The broad locations have no planning status and are not allocated for development. They have been identified through the SHLAA process and comprise a number of smaller individual sites.
- 15.11.2 Broad locations are identified on the Key Diagram (Figure 2). The Council has suggested a number of Minor Modifications to make the role of broad locations clearer within the Local Plan (Minor Modifications MI-LP57 to MI-LP63) (CD15).

15.12 Have the sites been assessed through the Sustainability Appraisal and Habitat Regulations Assessment or other mechanism?

15.12.1 Given that the broad locations are not considered to be "reasonable alternatives" to the site allocations they have not been through Sustainability Appraisal or Habitats Regulations

Assessment. Should they be brought forward at Local Plan Review stage they would then be subject to such assessments.

15.13 How would the Council consider an application for housing development which was submitted prior to a Local Plan review, for example in the circumstances set out in SP H3PU?

- 15.13.1 Should the Council be unable to demonstrate a 5 year supply of deliverable housing sites then, under criterion 4 of Policy H3, the tilted balance would be engaged and the Council would have no option but to consider housing within the broad locations. The Council is unlikely to be in this position within the first 5 years after adoption as it has identified sufficient deliverable sites to provide 200 dwellings per year, which is significantly greater than the annual housing requirement. The Council is also required to carry out a Local Plan Review 5 years from adoption when the status of the broad locations can be reviewed.
- 15.13.2 Following adoption of the Local Plan and whilst the Council has a 5 year supply of deliverable housing sites, general market housing would not be supported on sites within the broad location, unless material considerations indicate otherwise.

Appendix A Contents

Appendix A: Housing allocations in the towns:

Whitehaven

HWH1 Land at West Cumberland Hospital and Sneckyeat Road

HWH2 Red Lonning and Harris Moor

HWH3 Land at Edgehill Park Phase 4

HwH4 Land south and west of St Mary's School

HWH5 Former Marchon Site North

HWH6 Land south of Waters Edge Close

Cleator Moor:

HCM1 Land at Jacktrees Road

HCM2 Land north of Dent Road

HCM3 Former Ehenside School

HCM4 Land at Mill Hill

Egremont:

HEG1 Land north of Ashlea Road

HEG2 Land at Gulley Flats

HEG3 Land to south of Daleview Gardens

Millom:

HMI1 Land west of Grammerscroft

HMI2 Moor Farm

Housing allocations in the Local Service Centres:

HAR1 Land East of Arlecdon Road

HDI1 Land south of Prospect Works

HD12 Land south west of Rectory Place

HSB1 Land adjacent Abbots Court

HSB3 Land adjacent Fairladies

HSE2 Fairways Extension

HSE3 Town End Farm East

HTH1 Land to south of Thornhill

Housing allocations in the Sustainable Rural Villages and Rural Villages

HBE1 Land north of Crofthouse Farm

HBE2 Land adjacent to Mill Fields

HBI1 Land north of Springfield Gardens

HB12 Land west of Jubilee Gardens

HDH2 Wray Head, Station Road

HDH3 Hill Farm, Holmrook

HMR1 Land to north of Social Club

HMR2 Land to south of Scalegill Road

HLO1 Solway Road

HSU1 Land to South West of Summergrove

Appendix A

Site reference/name		HWH1 Land at West Cumberland Hospital and Sneckyeat Road, Whitehaven
15.3	What is the background to the site allocation? How was it identified?	Site put forward during a call for sites (Issues and Options) and included in the Interim SHLAA 2019 (WE032). The Council combined it with site WE001 which it owns to provide additional options for access. Landowner response supporting allocation was received during consultation on Local Plan Preferred Options draft. Landowner request to amend site boundary (We032) received during consultation on Local Plan Publication draft (see modification MA-APP9) – Removal of site WE001 (Council owned land) from allocation boundary as it no longer adjoined remainder of allocation. Council request to amend site name to reflect above changes (see modification MA-APP10)
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	4/22/2087/0F1 – Approved PRIOR APPROVAL FOR PROPOSED DEMOLITION OF EXISTING ACCOMMODATION BUILDINGS 1-7, 18-27, 28-31 AT HOMEWOOD HILL AND 1, 3, 5, 7, 9, 12, 14, 16, 18, 20,
15.5	How were the site areas and dwelling capacities determined?	Original site area determined through SHLAA process. Revision to boundary at Publication Stage (see 15.3 above) results in smaller site. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.

Site	reference/name	HWH1 Land at West Cumberland Hospital and Sneckyeat Road, Whitehaven
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	Potential Highway safety Impacts (Appendix F page 98) Potential sewer capacity and surface water flooding issues (Appendix F page 98) Potential sewer capacity and surface water flooding issues (Appendix F page 98) Potential harm to habitat for breeding birds, red squirrel and bats (Appendix F page 99) It should be noted that the assessment work for development on this allocation was undertaken when the size of the site was 5.27 hectares, with an indicative yield of 127 units. However, the Council has since been required to reduce the site size as the landowner has amended the site boundary, reducing the available and developable area to 1.90 hectares, with a reduced indicative yield of 46 dwellings (see suggested Appendix Main Modifications MA-APP11 and MA-APP12). Therefore, the potential impacts of development outlined in this response are likely to be reduced given that development on this site will be of a smaller scale. Loss of Protected Open Space (Appendix F page 99) The Housing Profile contained in Appendix F of the Local Plan Publication Draft states that the site currently contains an area of protected open space. The southern section of the originally submitted site has been used as a playing pitch in the past, although this use has lapsed and there are no pitches marked out at present. The Appendix stated that there would have been a requirement for any development on the site to replace the historic playing field in order to comply with the NPPF and Sport England's Playing Fields Policy; however, as this area of the site is proposed for removal from the allocation, this mitigation will no longer be required (see suggested Appendix Main Modifications MA-APP13 and MA-APP14). Safeguards and Mitigation

Site reference/name		HWH1 Land at West Cumberland Hospital and Sneckyeat Road, Whitehaven
		 Requirement for contribution towards improvements at Homewood Rd roundabout; details to be agreed at planning application stage as the requirement originally related to the larger site (Appendix F page 124, Policy DS5, Policy DS6, Policy CO2) Upgrades may be required to the sewerage system in order to upgrade capacity, details to be agreed at planning application stage (Policy DS8, Policy DS9, Policy N5) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3).
5.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for extended Phase 1 Habitats Survey • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) • Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is not currently viable for development within the plan period, with or without the provision of affordable housing. This conclusion is however based on the site as submitted, not the reduced site put forward at Publication stage. This site may require external or additional funding in order to enable delivery.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being developed within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HWH2 Red Lonning and Harris Moor, Whitehaven
15.3	What is the background to the site allocation? How was it identified?	Site put forward by landowner during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (WH011a). Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	4/18/2287/001 – Refused by Planning Panel Contrary to Officer Advice – appeal expected in 2023 OUTLINE APPLICATION FOR DEVELOPMENT OF UP TO 370 HOUSES WITH ASSOCIATED OPEN SPACE AND INFRASTRUCTURE
15.5	How were the site areas and dwelling capacities determined?	The site area and capacity was determined on the basis of information contained in the above application.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, the application included provision for necessary infrastructure and open space and this was reflected in the number of dwellings applied for.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of potential Adverse Effects See Planning Panel Report (this information is more up-to-date than that contained in Appendix F of the Local Plan Publication Draft): https://www.copeland.gov.uk/sites/default/files/planning-applications/4-18-2287-001 - planning panel report 16 august 2022.pdf Safeguards/Mitigation See Planning Panel Report (this information is more up-to-date than that contained in Appendix F of the Local Plan Publication Draft): https://www.copeland.gov.uk/sites/default/files/planning-applications/4-18-2287-001 -
		planning panel report 16 august 2022.pdf

Site reference/name		HWH2 Red Lonning and Harris Moor, Whitehaven
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • See Planning Panel Report for further updated information: https://www.copeland.gov.uk/sites/default/files/planning-applications/4-18-2287-001 - planning panel report 16 august 2022.pdf
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 3.97% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.

Site reference/name		HWH3 Land at Edgehill Park Phase 4, Whitehaven
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 (site WS013) Landowner response supporting allocation (as part of a larger site) submitted during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	4/22/2332/0F1 – decision pending FULL PLANNING APPLICATION FOR 109 DWELLING HOUSES AND ASSOCIATED INFRASTRUCTURE INCLUDING LANDSCAPING, OPEN SPACE, ACCESS, HIGHWAY AND DRAINAGE 4/22/2217/0F1 – Approved 24/11/22 IMPORTATION & DEPOSIT OF EARTH MATERIAL TO REPROFILE EXISTING GROUND LEVELS/CONTOURS; INSTALLATION OF SURFACE WATER DRAINAGE INFRASTRUCTURE
15.5	How were the site areas and dwelling capacities determined?	The site boundary reflects the piece of land between the existing development to the west and existing residential estate to the east. It was altered by the Council between the Preferred Options and Publication Drafts of the Local Plan to remove the section that had gained planning permission for 335 dwellings in April 2021 (4/20/2474/0R1). Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, the developer has demonstrated through the planning application that 109 dwellings can be delivered on site whilst retaining space for the necessary infrastructure.
15.6	What are the potential adverse impacts of developing the site and how could these be	Summary of potential Adverse Effects

Site reference/name		HWH3 Land at Edgehill Park Phase 4, Whitehaven
	mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential impacts upon National Site Network Sites through loss of or disturbance to Off-Site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 107) Potential impact on heritage assets (Appendix F page 108) Potential impact on adjoining playing pitch (Appendix F page 108) Additional constraints, such as ecological constraints have been identified through the planning application process. Submitted information can be found on the Council's website at: https://www.copeland.gov.uk/planning/application/42123240f1 Safeguards/Mitigation Requirement for site specific HRA at planning application stage (new appendix H/HRA) Requirement for secondary access, junction improvements and traffic calming measures; details to be agreed at planning application stage (Appendix F page 107, Policy DS5, Policy DS6, Policy CO2) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for assessment of impacts on playing pitch at planning application stage and if necessary mitigation (Policy SC4) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Further mitigation may be proposed as part of the above planning application.
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified:
	would these be addressed?	 Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey

Site reference/name		HWH3 Land at Edgehill Park Phase 4, Whitehaven
		 Requirement for ground investigations and potential remediation given previous uses Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The site was not assessed in the Viability Study Part 2 (EB44) given that there was a current planning application (which has since been approved) which demonstrates deliverability. The developer has made significant progress on the wider site which also demonstrates viability.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer who has delivered a significant number of houses already on the adjoining site.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.

Site reference/name		HWH4 Land south and west of St Mary's School, Whitehaven	
15.3	What is the background to the site allocation? How was it identified?	Site put forward by landowner in July 2020 and included in subsequent SHLAA (Site WW018). Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	Original site area determined through SHLAA process based on field boundaries. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of potential Adverse Effects Potential impacts upon National Site Network Sites through water quality (New Appendix H/HRA) (CDC11) Potential impacts on unknown archaeological remains (Appendix F page 111) Potential highway safety impacts (Appendix F page 111) Potential harm to ground nesting birds (Appendix F page 112) Potential impact on heritage assets (Appendix F page 112) Potential impact on adjoining playing pitch (Appendix F page 112) Potential impact on landscape including the St Bees and Whitehaven Heritage Coast (Appendix F page 112) 	

Site reference/name		HWH4 Land south and west of St Mary's School, Whitehaven
		 Safeguards/Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) (CDC11) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for upgrades to local road network and introduction of traffic calming measures; details to be agreed at planning application stage (Appendix F page 111, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for archaeological site investigation at planning application stage (Policy BE3) Requirement for assessment of impacts on pitch at planning application stage and if necessary, mitigation (Policy SC4) Requirement for landscape assessment at planning application stage (Policy N6, Policy N7)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings

Site reference/name		HWH4 Land south and west of St Mary's School, Whitehaven
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 2.6% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HWH5 Former Marchon Site North, Whitehaven	
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 (Site WW014) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	4/21/2432/0F1 – Decision pending Hybrid application on larger site for 139 homes. Outline permission being sought on the part of the application site within the allocated site relates, with full permission being sought on land to the west beyond the Wagon Way.	
15.5	How were the site areas and dwelling capacities determined?	Site area determined by constraints (Waggon Way to NW, former site fenceline to West, Cumbria Mining site to south and road to west). Capacity provided by the developer during pre-application stage.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	The capacity of the site was identified by the developer on the basis of an indicative plan which included open space and all necessary infrastructure. It is therefore considered to be justified.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality and loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 115) Potential harm to habitat for nesting birds (Appendix F page 116) Potential impacts on future residential amenity given proximity to the proposed Cumbria Mine (Appendix F page 117) Potential landscape impacts on St Bees and Whitehaven Heritage Coast (Appendix F page 117) Potential impact on heritage assets (Appendix F page 117) 	

Site reference/name		HWH5 Former Marchon Site North, Whitehaven
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) (CDC11) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for various highway works including traffic calming measures, upgrades to footpaths etc; details to be agreed at planning application stage (Appendix F page 115, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for landscape buffer between the two uses, details to be agreed at planning application stage (Policy DS7) Requirement to protect and enhance landscapes, including the Heritage Coast (Policy N6, Policy N7) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for extended Phase 1 Habitats Survey • Requirement for ground investigation and mitigation linked to potential previous uses (Policy DS10) • Requirement for contribution towards education provision in South Whitehaven (IDP) • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere)

Site reference/name		HWH5 Former Marchon Site North, Whitehaven
		 Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure on the site – this would be addressed through appropriate design.
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is just under the viable threshold for development within the plan period, with an estimated -1.76% surplus GDV. This figure does not include the provision of 10% affordable housing. The viability of this site is heavily determined through the contaminated land engendered through previous use. The provision of external funding may be necessary to facilitate deliver of housing on the site.
15.9	What is the situation in relation to land ownership and developer interest?	The developer has an option on the site and is currently seeking planning permission to develop it.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with 420 of the 532 homes being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.

Site reference/name		HWH6 Land south of Waters Edge Close, Whitehaven
15.3	What is the background to the site allocation? How was it identified?	Site put forward by landowner during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (WW019/a) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	4/20/2455/0F1 – Approved subject to S106 agreement RESIDENTIAL DEVELOPMENT OF 40 DWELLINGS
15.5	How were the site areas and dwelling capacities determined?	Site boundary identified during the SHLAA process – site is a continuation of development to the north. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	An application has been approved for a slightly greater number of homes which demonstrates that the assumptions are justified, if not slightly conservative. The application shows how space will be retained for the necessary infrastructure.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	Summary of Potential Adverse Effects • See Planning Panel Report for further information: https://www.copeland.gov.uk/sites/default/files/planning-applications/4-20-2455-0f1- planning_panel_report.pdf Safeguards and Mitigation

Site reference/name		HWH6 Land south of Waters Edge Close, Whitehaven
		See Planning Panel Report for further information: https://www.copeland.gov.uk/sites/default/files/planning-applications/4-20-2455-0f1-planning-panel_report.pdf
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	See Planning Panel Report for further information: https://www.copeland.gov.uk/sites/default/files/planning-applications/4-20-2455-0f1-planning-panel-report.pdf
15.8	Is the development proposed viable and deliverable within the plan period?	This site has not been covered in the Local Plan Viability Study as planning permission was granted in March 2022. This indicates that the development proposed is viable and deliverable within the plan period.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. As no delivery timeframe was provided, a conservative estimate of 10 dwellings per year was made based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HCM1 Land at Jacktrees Road, Cleator Moor	
15.3	What is the background to the site allocation? How was it identified?	Site put forward by the landowner during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (sites CM028 and CM038) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	Site area derived from the SHLAA (CM028) – combined with CM038 (which is in separate ownership) to provide opportunity for additional access and create single site HCM1. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality, urbanisation and loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential impacts on unknown archaeological remains (Appendix F page 125) Potential highway safety impacts (Appendix F page 124) Potential harm to habitat for breeding birds and bats (Appendix F page 125) Potential impact on heritage assets (Appendix F page 125) Possible mine workings (Appendix F page 125) 	

Site reference/name		HCM1 Land at Jacktrees Road, Cleator Moor
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) (CDC11) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for secondary site access, reduction to speed limit outside site and additional footways; details to be agreed at planning application stage (Appendix F page 124, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for ground investigations linked to potential previous uses (Policy DS10)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure on the site – this would be addressed through appropriate design.

Site reference/name		HCM1 Land at Jacktrees Road, Cleator Moor
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 1.27% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer (CM028) and a registered provider (CM038).
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. As no delivery timeframe was provided, a conservative estimate of 10 dwellings per year was made based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HCM2 Land north of Dent Road, Cleator Moor	
15.3	What is the background to the site allocation? How was it identified?	Site forms part of larger site put forward by landowner during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (CM082) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The site size was reduced from that submitted (removing section to the north) to reduce the impact upon the landscape. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality, urbanisation effects and loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 128) Potential harm to habitat for foraging and nesting birds (Appendix F page 129) Potential landscape impacts due to part high ground setting (Appendix F page 128) 	
		Safeguards/Mitigation ■ Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5)	

Site r	eference/name	HCM2 Land north of Dent Road, Cleator Moor
15.7	What are the infrastructure requirements/costs and are there physical or	 Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) (CDC11) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for emergency vehicle site access, reduction to speed limit outside site and footway improvements; details to be agreed at planning application stage (Appendix F page 128, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for development to protect and enhance landscapes (Policy N6) As well as infrastructure requirements listed above, the following requirements/constraints have also been identified:
	other constraints to development? How would these be addressed?	 Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for Landscape Assessment Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 1.37% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As no delivery timeframe was provided, a conservative estimate of 10 dwellings per year was made based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site	reference/name	HCM3 Former Ehenside School, Cleator Moor
15.3	What is the background to the site allocation? How was it identified?	The site forms part of a larger site that was put forward by the landowner during the call for sites (Issues and Options) and was identified in Interim SHLAA 2019 (CM008). Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/cons truction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site size was reduced from that submitted to exclude areas of playing field. The site area reflects the footprint of the previous school development (and areas of hardsurfacing). Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality and urbanisation (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 132) Potential harm to habitat for great crested newts (Appendix F page 133) Potential impact on heritage assets (Appendix F page 134) Potential prejudicial impact on adjacent playing field (Appendix F page 134)
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H − see modification MI-APP5) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H − see modification MI-APP5)

Site reference/name		HCM3 Former Ehenside School, Cleator Moor
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	 Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for improvements to footpath and traffic calming measures; details to be agreed at planning application stage (Appendix F page 132, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for assessment of impacts on adjacent playing field (Policy SC4) As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure on the site – this would be addressed through appropriate design.
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is just under the threshold for viable for development within the plan period, with an estimated -2.91% surplus GDV. This figure does not include the provision of 10% affordable housing. The site is owned by Cumbria County Council who may have the option of releasing the site to a developer for less than market value in order to bring it forward for development. The provision of external funding, such as through Homes England, may be also necessary to facilitate the increased viability and deliverability of the site.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown

Site reference/name		HCM3 Former Ehenside School, Cleator Moor
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HCM4 Land at Mill Hill, Cleator Moor
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 (CM025) as the land was subject to an outline planning application. The site adjoins SHLAA site CM026 (land to the south) which is owned by the same landowner and where development is under construction.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	4/18/2472/001 – Approved OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF UP TO 65 DWELLINGS WITH FULL DETAILS OF ACCESS AND ASSOCIATED INFRASTRUCTURE Reserved matters application (4/21/2436/0R1) submitted but subsequently withdrawn 4/21/2335/0B1 - Approved AMENDMENT OF CONDITION 5 OF PLANNING APPROVAL 4/18/2472/001 -OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF 65 DWELLINGS INCLUDING FULL DETAILS
15.5	How were the site areas and dwelling capacities determined?	The site area matches that approved under the above reference. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	The indicative capacity (81 dwellings) was identified prior to outline approval for 65 dwellings being granted. In retrospect, a yield that reflects the outline permission may have been more appropriate. The Council would have no objection should the Inspector wish to include a modification which reduces the site's yield.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation,	Summary of potential Adverse Effects and safeguards/mitigation Adverse impacts and necessary mitigation were identified through the planning application process. The planning approval contains conditions relating to the highways and drainage and

Site reference/name		HCM4 Land at Mill Hill, Cleator Moor
	landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	informatives relating to potential coal-mining features, water mains/UU easements crossing the site and a requirement for discussions with UU re. water supply and connections to the public sewers.
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	See comment above
15.8	Is the development proposed viable and deliverable within the plan period?	The site was not assessed in the Viability Study Part 2 (EB44) given that there was an existing planning approval on site which demonstrates deliverability.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. As no delivery timeframe has been provided a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HEG1 Land north of Ashlea Road, Egremont
15.3	What is the background to the site allocation? How was it identified?	Sites EG036 and EG038 were put forward during a call for sites (Issues and Options) and were included in Interim SHLAA 2019 along with adjoining sites along with Council owned site EG014. The three sites were combined to form a single site HEG1.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/cons truction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted, the part of the site owned by the Council was determined on the basis of field boundaries and landownership.
		Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts on unknown archaeological remains (Appendix F page 142) Potential highway safety impacts (Appendix F page 141) Potential harm to habitat for breeding birds (Appendix F page 142) Loss of public open space/former playing field (Appendix F page 142) Safeguards/Mitigation Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for reduction to speed limit, traffic calming measures, creation of emergency vehicle access, and improvements to footway; details to be agreed at planning application stage (Appendix F page 141, Policy DS5, Policy DS6, Policy CO2)

Site reference/name		HEG1 Land north of Ashlea Road, Egremont
		 Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for provision of replacement open space/playing field (Policy SC3, Policy N11)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 1.53% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest in the site unknown
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HEG2 Land at Gulley Flats, Egremont
15.3	What is the background to the site allocation? How was it identified?	The site is comprised of three sites put forward during a call for sites (Issues and Options) which were then identified in Interim SHLAA 2019 (EG008/EG025/EG032). Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality (New Appendix H/HRA) (CDC11) Potential impacts on unknown archaeological remains (Appendix F page 146) Potential highway safety impacts (Appendix F page 145) Potential harm to habitat for breeding birds and wintering birds (Appendix F page 146) Potential impact on heritage assets (Appendix F page 147)
		Safeguards and Mitigation ■ Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5)

Site reference/name		HEG2 Land at Gulley Flats, Egremont
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	 Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for emergency vehicle access, reduction to speed limit outside site, additional footways and traffic calming measures; details to be agreed at planning application stage (Appendix F page 145, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application
		 Requirement for Archaeological Assessment Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings The site is partially located in Groundwater Source Protection Zone 1 immediately adjacent to Gulley Flats borehole. Risk assessments will therefore be required to ensure groundwater source is protected. Further information can be found in Appendix F, page 145.
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 2.47% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest in the site unknown

Site reference/name		HEG2 Land at Gulley Flats, Egremont
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HEG3 Land to south of Daleview Gardens, Egremont
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and was identified in Interim SHLAA 2019 (EG007) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality (New Appendix H/HRA) (CDC11) Potential impacts on unknown archaeological remains (Appendix F page 151) Potential highway safety impacts (Appendix F page 150) Potential harm to habitat for breeding birds, bats, amphibians, red squirrel and otter (Appendix F page 151) Potential impact on heritage assets (Appendix F page 151) Potential landscape impacts (Appendix F page 150)

Site reference/name		HEG3 Land to south of Daleview Gardens, Egremont	
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for secondary site access and additional footways; details to be agreed at planning application stage (Appendix F page 151, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for development to protect and enhance landscapes (Policy N6) 	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for Archaeological Assessment Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.82% surplus GDV. This figure includes the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest in the site unknown	

Site reference/name		HEG3 Land to south of Daleview Gardens, Egremont
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HMI1 Land west of Grammerscroft, Millom	
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 (MI001)	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential impacts upon National Site Network Sites through loss of or disturbance to offsite supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 155) Potential harm to habitat for breeding birds (Appendix F page 156) Potential impact on heritage assets (Appendix F page 156) Potential surface water flooding (Appendix F page 155) Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see 	
		 Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for highway realignment, traffic calming measures and improvements to footways; details to be agreed at planning application stage (Appendix F page 155, Policy DS5, Policy DS6, Policy CO2) 	

Site r	eference/name	HMI1 Land west of Grammerscroft, Millom
		 Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for planning application to comply with flood risk related policies DS8, DS9.
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for a Project level HRA Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.17% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest in the site unknown
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HMI2 Moor Farm, Millom	
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 as two smaller adjoining sites (MI022/MI026). Developer response supporting allocation received during consultation on Local Plan Preferred Options draft.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential highway safety impacts (Appendix F page 159) Potential harm to habitat for breeding birds and bats (Appendix F page 160) Potential impact on heritage assets (Appendix F page 161) Potential impacts on flood risk (Appendix F page 159) Safeguards and Mitigation Requirement for secondary site access, new toucan crossing, improvements to footways and addition of a bus stop and shelter; details to be agreed at planning application stage (Appendix F page 159, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) 	

Site reference/name		HMI2 Moor Farm, Millom	
		 Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement to protect water resources (Policy DS8) 	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	 The following infrastructure requirements have been identified as being required: Requirement to provide flooding solution (in partnership with UU and the LLFA) Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure and land interests on the site – this would be addressed through appropriate design. 	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -0.28% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned privately but has active developer interest	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.	

Site reference/name		HAR1 Land East of Arlecdon Road, Arlecdon
15.3	What is the background to the site allocation? How was it identified?	The site comprises two smaller sites put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (AR009/AR020). Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential highway safety impacts (Appendix F page 165) Potential harm to habitat for breeding birds, nesting birds and reptiles (Appendix F page 166) Potential impact on heritage assets (Appendix F page 166) Safeguards and Mitigation Requirement for footway improvements and traffic calming measures; details to be agreed at planning application stage (Appendix F page 165, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3)

Site reference/name		HAR1 Land East of Arlecdon Road, Arlecdon	
		Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2)	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure (including the Thirlmere to West Cumbria water pipeline) and land interests on the site – this would be addressed through appropriate design.	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.12% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.	

Site reference/name		HDI1 Land south of Prospect Works, Distington
15.3	What is the background to the site allocation? How was it identified?	The site (DI013a) is part of a larger site put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (DI013) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Summary of Potential Adverse Effects Potential highway safety impacts (Appendix F page 169) Potential harm to habitat for breeding birds, bats, amphibians and reptiles (Appendix F page 170) Potential impact on heritage assets (Appendix F page 170) Safeguards and Mitigation Requirement for further assessment to confirm the deliverability of new and extended footways; details to be agreed at planning application stage (Appendix F page 169, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2)

15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for extended Phase 1 Habitats Survey • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) • Requirement for at least 10% affordable dwellings United Utilities combined sewer runs through site. This can be addressed through good quality design.
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -2.76% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HD12 Land south west of Rectory Place, Distington
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 (DI033). Landowner email to confirm site is available and allocation supported (October 2021)
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A (previous housing use has been demolished)
15.5	How were the site areas and dwelling capacities determined?	Site area is based on the footprint of the cleared housing site. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential highway safety impacts (Appendix F page 173) Potential harm to habitat for breeding birds and bats (Appendix F page 174) Loss of Local Green Space (Appendix F 174) Safeguards and Mitigation Requirement for traffic calming measures, improvements to footpaths, potential reconfiguration of junctions and the upgrading of a footpath to a bridleway; details to be agreed at planning application stage (Appendix F page 173, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for replacement Local Green Space (Policy N11, Policy N12)

Site reference/name		HD12 Land south west of Rectory Place, Distington	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has viability issues for development within the plan period, it retains a -9.68% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a Registered Provider	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.	

Site reference/name		HSB1 Land adjacent Abbots Court, St Bees	
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (SB001). Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	Site area determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential highway safety impacts (Appendix F page 177) Potential harm to habitat for nesting birds (Appendix F page 177/178) Potential impact on heritage assets (Appendix F page 178) Safeguards and Mitigation Requirement for emergency vehicle access, improvements to footways, improvements to site access; details to be agreed at planning application stage (Appendix F page 177, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) 	

15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.98% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 3 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.

Site	reference/name	HSB3 Land adjacent Fairladies, St Bees	
15.3	What is the background to the site allocation? How was it identified?	The site is comprised of two smaller sites put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (SB018 and SB028). SB028 was originally submitted as a larger site. Landowner submission on eastern half of site at Preferred Options stage, landowner submission on western part of the site at Publication Draft stage.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The area taken forward for allocation is smaller than that submitted under SB028. This is to ensure that the eastern boundary aligns with that of SB018 in order to reduce landscape impacts. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	Potential Adverse Effects • Potential highway safety impacts (Appendix F page 181) Safeguards and Mitigation • Requirement for continuation of footways (Appendix F, page 181, Policy DS5, Policy DS6, Policy CO2)	
15.7	What are the infrastructure requirements/costs and are there physical or	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified:	

Site reference/name		HSB3 Land adjacent Fairladies, St Bees
	other constraints to development? How would these be addressed?	 Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application United Utilities have identified the presence of utilities infrastructure on the site – this would be addressed through appropriate design.
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -1.47% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest in the site unknown.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HSE2 Fairways Extension, Seascale	
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and is identified in Interim SHLAA 2019 (SE024).	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential highway safety impacts (Appendix F page 184) Potential harm to habitat for breeding birds (Appendix F page 184) Potential prejudicial impact on adjacent playing field (Appendix F page 185) Safeguards and Mitigation Requirement for secondary site access; details to be agreed at planning application stage (Appendix F page 184, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for assessment of impacts on adjacent playing field (Policy SC4) 	
15.7	What are the infrastructure requirements/costs and are there physical or	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for extended Phase 1 Habitats Survey	

Site reference/name		HSE2 Fairways Extension, Seascale	
	other constraints to development? How would these be addressed?	 Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings 	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -4.07% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 3 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.	

Site ı	reference/name	HSE3 Town End Farm East, Seascale
15.3 15.4	What is the background to the site allocation? How was it identified? Which options were considered? Current planning status (applications/permissions/completions/construction)	The site was put forward for consideration by Seascale Town Council during the consultation on the Local Plan Pre-publication draft. This was then supported by the landowner. Housing N/A
15.5	How were the site areas and dwelling capacities determined?	Original site area determined by landownership and constraints (development on three other sides) Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential highway safety impacts (Appendix F page 188) Potential harm to habitat for breeding birds and amphibians (Appendix F page 189) Potential impacts on surface water flooding (Appendix F page 188) Safeguards and Mitigation Requirement for primary site access with footways and traffic calming measures; details to be agreed at planning application stage (Appendix F page 188, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for Drainage Strategy at planning application stage (Appendix F page 188) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9)

Site reference/name		HSE3 Town End Farm East, Seascale	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for extended Phase 1 Habitats Survey Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -1.60% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.	

Site reference/name		HTH1 Land to south of Thornhill, Thornhill
15.3 15.3	What is the background to the site allocation? How was it identified? Which options were considered?	Site identified in the 2019 SHLAA (site TO002). Confirmation of availability and support for allocation received from landowner in October 2021. Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	An assumption of 25 dwellings per hectare was applied in the Preferred Options Draft, however the Site Access Assessment indicated that this level of housing could not be achieved given the lack of a secondary access to the site, therefore the yield was reduced to 20 dwellings. The site area remains the same to that identified in the SHLAA.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, the yield is based on advice from the Highways Authority taking into account what the surrounding highways and access can support. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts on unknown archaeological remains (Appendix F page 193) Potential harm to habitat for breeding birds and bats (Appendix F page 193) Potential impact on heritage assets (Appendix F page 193) Potential prejudicial impacts on adjoining playing field (Appendix F page 193) Safeguards and Mitigation Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for assessment of impacts on adjacent playing field (Policy SC4)

Site reference/name		HTH1 Land to south of Thornhill, Thornhill	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure (including surface water sewer) and land interests on the site – this would be addressed through appropriate design.	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has viability issues for development within the plan period, it retains a -8.77% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.	

Site reference/name		HBE1 Land north of Crofthouse Farm, Beckermet
15.3	What is the background to the site allocation? How was it identified?	The site is comprised of two smaller sites put forward during a call for sites (Issues and Options) and identified in the 2019 SHLAA (BE003/BE023). BE023 was excluded from the SHLAA as its size fell below the threshold for consideration, however it is required to enable access to the larger BE003 site.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted by the landowners. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality (New Appendix H/HRA) (CDC11) Potential impacts on unknown archaeological remains (Appendix F page 198) Potential highway safety impacts (Appendix F page 197) Potential harm to habitat for bats (Appendix F page 197) Potential impact on heritage assets (Appendix F page 198) Possible ground gas (Appendix F page 198) Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5)

Site ı	reference/name	HBE1 Land north of Crofthouse Farm, Beckermet
15.7	What are the infrastructure	 Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) (CDC11) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for additional assessment re visibility splays and provision of new footways; details to be agreed at planning application stage (Appendix F page 197, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for ground investigations linked to potential previous uses (Policy DS10) As well as infrastructure requirements listed above, the following requirements/constraints have also been identified:
	requirements/costs and are there physical or other constraints to development? How would these be addressed?	 Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 1.67% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown

Site reference/name		HBE1 Land north of Crofthouse Farm, Beckermet
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HBE2 Land adjacent to Mill Fields, Beckermet
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 as two smaller adjoining sites (BE003/BE023) Landowner confirmation of availability/support for allocation received in August 2021.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	Original site area determined through SHLAA process based on field boundaries – constrained to the NE and SW by development and to the south by road. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality (New Appendix H/HRA) (CDC11) Potential flooding impacts (Appendix F page 202). Potential impacts on unknown archaeological remains (Appendix F page 202) Potential highway safety impacts (Appendix F page 201) Potential harm to habitat for bats (Appendix F page 201) Potential loss of species rich hedgerow (Appendix F page 202) Potential impact on heritage assets (Appendix F page 202)

Site reference/name		HBE2 Land adjacent to Mill Fields, Beckermet
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for reduction in speed limit outside the site and new footways; details to be agreed at planning application stage (Appendix F page 201, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.39% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown

Site reference/name		HBE2 Land adjacent to Mill Fields, Beckermet
15.10	What is the expected timescale and rate of	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions
	development and is this realistic?	will be seen on site in year 5 with the full site being delivered within the plan period. As there is
		no developer actively involved with the site at present a conservative estimate of 10 dwellings
		per year was made of delivery rates based on past trends elsewhere. Further details can be
		found in the housing trajectory document.

Site reference/name		HBI1 Land north of Springfield Gardens, Bigrigg	
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (BI001)	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the information submitted with the eastern boundary reflecting the extent of built development to the south.	
		Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 205) Potential harm to habitat for breeding birds (Appendix F page 206) Potential impact on heritage assets (Appendix F page 206) Safeguards and Mitigation Requirement for Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) 	

Site reference/name		HBI1 Land north of Springfield Gardens, Bigrigg
		 Requirement for reduction in speed limit outside site and alternative access; details to be agreed at planning application stage (Appendix F page 188, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for extended Phase 1 Habitats Survey • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) • Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 2.65% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 3 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.

Site	reference/name	HB12 Land west of Jubilee Gardens, Bigrigg	
15.3	What is the background to the site allocation? How was it identified?	The site comprises three sites, two of which were put forward during a call for sites (Issues and Options) (BI002/BI018). The third is a small council owned site which has been combined with the other two to provide opportunities to improve pedestrian links to the existing estate. The two larger sites are identified in Interim SHLAA 2019.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The original site area of site BI002 was reduced by the Council to ensure western boundary extends no further than existing development to the south in order to reduce landscape impacts. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 209) Potential harm to habitat for breeding birds (Appendix F page 210) Potential ground stability/contamination on part of site due to previous mining use (Appendix F page 210) 	

Site reference/name		HB12 Land west of Jubilee Gardens, Bigrigg
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for contribution towards pedestrian crossing and shared use path (Appendix F page 209) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for ground investigations and potential remediation linked to potential previous uses (Policy DS10) As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application
		 Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.67% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HDH2 Wray Head, Station Road, Drigg
15.3	What is the background to the site allocation? How was it identified?	Site identified in Interim SHLAA 2019 (DH012) Confirmation of site availability/support for allocation received from landowner in September 2021.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the field boundaries and is constrained on all side by development/highway. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality and loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential impacts on unknown archaeological remains (Appendix F page 214) Potential highway safety impacts (Appendix F page 213) Potential impact on heritage assets (Appendix F page 125) Potential harm to habitat for breeding birds, amphibians and reptiles (Appendix F page 214)

Site ı	reference/name	HDH2 Wray Head, Station Road, Drigg
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for new footpath and safe crossing points; details to be agreed at planning application stage (Appendix F page 213, Policy DS5, Policy DS6, Policy CO2) Requirement for archaeological investigations at planning application stage (Policy BE3) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings Potential requirement for upgrades to waste water treatment work capacity
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -1.75% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown

Site reference/name		HDH2 Wray Head, Station Road, Drigg
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HDH3 Hill Farm, Holmrook
15.3 15.3 15.4	What is the background to the site allocation? How was it identified? Which options were considered? Current planning status (applications/permissions/completions/construction)	The site (DH007/a) was put forward as part of a larger site (DH007) during call for sites (Issues and Options). Housing N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was reduced from that originally submitted to exclude the field to the NW in order to reduce potential landscape impacts. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through water quality (New Appendix H/HRA) Potential highway safety impacts (Appendix F page 217) Potential harm to habitat for breeding birds, badgers, red squirrel and bats (Appendix F page 218) Potential impact on heritage assets (Appendix F page 218) Potential ground contamination issues from former uses (Appendix F page 218) Potential surface water flooding (Appendix F page 217)

Site reference/name		HDH3 Hill Farm, Holmrook
		 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) (CDC11) Requirement for Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5) Requirement for planning application to comply with protection of water courses policy (Policy N5, Policy DS8, Policy DS9) Requirement for a speed survey and assessment of visibility splays; details to be agreed at planning application stage (Appendix F page 217, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement for ground investigations and potential remediation linked to potential previous uses (Policy DS10)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for extended Phase 1 Habitats Survey • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) • Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has marginal viability issues for development within the plan period, it retains a -4.87% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown

Site reference/name	HDH3 Hill Farm, Holmrook
15.10 What is the expected timescale as development and is this realistic?	te of The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 6 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HMR1 Land to north of Social Club, Moor Row
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and identified in the Interim SHLAA 2019 (MO009) Landowner response supporting allocation received during consultation on Local Plan Preferred Options draft.
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	4/21/2360/001 – Approved subject to S106 Outline application for residential development with details of proposed access junction and all other matters reserved
15.5	How were the site areas and dwelling capacities determined?	The site area was determined by the site submitted. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 221) Potential harm to habitat for breeding birds (Appendix F page 222) Potential prejudicial impact on adjacent playing field (Appendix F page 222)

Site reference/name		HMR1 Land to north of Social Club, Moor Row
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	 Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for various highway works including traffic calming measures, upgrades to footpaths and improved streetlighting; details to be agreed at planning application stage (Appendix F page 221, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement for assessment of impacts on adjacent playing field (Policy SC4) As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings United Utilities have identified the presence of utilities infrastructure (including a combined sewer) and land interests on the site – this would be addressed through appropriate design.
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.01% surplus GDV. This figure does not include the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is

Site	reference/name	HMR1 Land to north of Social Club, Moor Row
		no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.

Site reference/name		HMR2 Land to south of Scalegill Road, Moor Row	
15.3	What is the background to the site allocation? How was it identified?	The site (MO006/a) was put forward as part of a larger site (MO006) during a call for sites (Issues and Options) and identified in Interim SHLAA 2019.	
15.3	Which options were considered?	Housing	
15.4	Current planning status (applications/permissions/completions/construction)	N/A	
15.5	How were the site areas and dwelling capacities determined?	The site area originally submitted was reduced to that proposed for allocation to ensure development extends no further south than adjoining development in order to reduce landscape impacts.	
		Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 225) Potential harm to habitat for breeding birds (Appendix F page 225) Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5) Requirement for traffic calming measures (Appendix F page 221, Policy DS5, Policy DS6, Policy CO2) 	

Site reference/name		HMR2 Land to south of Scalegill Road, Moor Row	
		 Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3. 	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for extended Phase 1 Habitats Survey • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) • Requirement for at least 10% affordable dwellings • United Utilities have identified the presence of utilities infrastructure (including a public sewer with a higher risk of surcharge) and land interests on the site – this would be addressed through appropriate design.	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 0.10% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown.	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.	

Site reference/name		HLO1 Solway Road, Lowca
15.3	What is the background to the site allocation? How was it identified?	The site was identified in Interim SHLAA 2019 (LO004)
15.3	Which options were considered?	Housing
15.4	Current planning status (applications/permissions/completions/construction)	N/A
15.5	How were the site areas and dwelling capacities determined?	The site area was determined through the SHLAA based on field boundaries with the eastern edge of the site following the edge of the built development to the north. Indicative capacity based on assumed density of 25 dwellings per hectare. The Council consulted on potential indicative densities during the consultation on the 2019 SHLAA methodology.
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, a density assumption of 25 dwellings per hectare has been used which is relatively low and would allow necessary infrastructure to be accommodated on site. If sufficient space cannot be found for biodiversity net gain and affordable housing then Policies N3 and H8 allow for provision off site.
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential impacts upon National Site Network Sites through loss of or disturbance to off-site supporting habitats (New Appendix H/HRA) (CDC11) Potential highway safety impacts (Appendix F page 229 – numbered 225 in error) Potential harm to habitat for breeding birds and ground nesting birds (Appendix F page 229 – numbered 225 in error) Potential impact on heritage assets (Appendix F page 130 – numbered 226 in error) Safeguards and Mitigation Requirement for site specific HRA at planning application stage (new appendix H – see modification MI-APP5)

Site reference/name		HLO1 Solway Road, Lowca	
		 Requirement for upgrades to highways and new footway connections; details to be agreed at planning application stage (Appendix F page 229, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3) Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) 	
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: Requirement for extended Phase 1 Habitats Survey Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) Requirement for at least 10% affordable dwellings Electricity lines run through site. This can be addressed through good quality design (Appendix F 140).	
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site has viability issues for development within the plan period, it retains a -4.34% surplus GDV. This figure does not include the provision of 10% affordable housing.	
15.9	What is the situation in relation to land ownership and developer interest?	Developer interest unknown	
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 5 with the full site being delivered within the plan period. As there is no developer actively involved with the site at present a conservative estimate of 10 dwellings per year was made of delivery rates based on past trends elsewhere. Further details can be found in the housing trajectory document.	

Site reference/name		HSU1 Land to South West of Summergrove	
15.3	What is the background to the site allocation? How was it identified?	The site was put forward during a call for sites (Issues and Options) and identified in Interim SHLAA 2019 (MO028).	
15.3	Which options were considered?	Housing/Employment	
15.4	Current planning status (applications/permissions/completions/construction)	4/19/2126/0F1 – Withdrawn ERECTION OF 194 DWELLINGS WITH ASSOCIATED LANDSCAPING, OPEN SPACE, SUSTAINABLE URBAN DRAINAGE AND VEHICULAR AND PEDESTRIAN ACCESS 4/22/2237/001 – Decision pending OUTLINE PLANNING APPLICATION INCLUDING ACCESS FOR UP TO 30 No. SELF-BUILD DWELLINGS	
15.5	How were the site areas and dwelling capacities determined?	Site area and capacity based on pre-application discussions with developer.	
15.5	Are the assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?	Yes, the developer has indicated through the application above that development can be delivered on half of the site whilst providing the necessary infrastructure. The remainder of the site is large enough to accommodate the remainder of the houses identified in the allocation.	
15.6	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would policy safeguards and proposed mitigation be sufficiently effective?	 Potential Adverse Effects Potential highway safety impacts (Appendix F page 234 – numbered 230 in error) Potential harm to habitat for breeding birds, bats and red squirrel (Appendix F page 235 – numbered 231 in error) Potential impact on heritage assets (Appendix F page 235 – numbered 231 in error) Potential impact on TPO (Appendix F page 234 – numbered 230 in error) Safeguards and Mitigation	

Site reference/name		HSU1 Land to South West of Summergrove
		 Requirement for various highway works including reduction to speed limit, improved pedestrian connections to Westlakes Science Park and Summergrove Hall and contributions towards junction improvements; details to be agreed at planning application stage (Appendix F page 234, Policy DS5, Policy DS6, Policy CO2) Requirement for planning application to comply with protection of biodiversity and biodiversity net gain policies (Policy N1, Policy N3). Requirement to protect and enhance heritage assets (Policy BE1, Policy BE2) Requirement to protect trees (Policy N13)
15.7	What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?	As well as infrastructure requirements listed above, the following requirements/constraints have also been identified: • Requirement for extended Phase 1 Habitats Survey • Requirement for a Flood Risk Assessment and Drainage Strategy to support any future planning application • Requirement for at least 10% biodiversity net gain to be provided on site (or elsewhere) • Requirement for at least 10% affordable dwellings
15.8	Is the development proposed viable and deliverable within the plan period?	The Viability Study Part 2 (EB44) highlights that this site is viable for development within the plan period, it retains a 3.56% surplus GDV. This figure includes the provision of 10% affordable housing.
15.9	What is the situation in relation to land ownership and developer interest?	The site is owned by a housing developer.
15.10	What is the expected timescale and rate of development and is this realistic?	The modified Housing Trajectory (see modification MI-APP5) shows that the first completions will be seen on site in year 4 with the full site being delivered within the plan period. The delivery rate shown in the trajectory was provided by the developer in 2021. The Council is in the process of seeking an update to ensure the rate of development remains up-to-date.