

P24-2881

9 October 2025

Caroline Fearon  
Cumberland Council (Allerdale)  
Development Management  
Allerdale House  
Workington  
CA14 3YJ

Dear Caroline,

**Submission of Planning Addendum to Planning Application FUL/2024/0192 at Land South of Low Road, Cockermouth**

Pegasus Group writes to you on behalf of the Applicant, Lakeland Leisure Ltd, to formally update the Authority on the abovementioned proposal. Specifically, our objective is to clarify and address all outstanding issues to ensure that the planning application is fully informed and can proceed to a positive determination.

The format of this Letter is as follows:

- Overview of Planning Application;
- Other Relevant Material Planning Considerations; and
- Summary.

The following documents are enclosed and have been submitted in support of this application taking into consideration amendments that have been made to the proposal:

- Flood Risk Assessment (Report Ref. 24-002-002, Rev P6);
- Transport Statement (Ref. 784-BO50321, Rev 1 – Dated 24<sup>th</sup> September, 2025);
- Site Plan (Drg No. 14/11/848 – 201 No. C);
- Site Plan (Reduced scale for BNG purposes) (Drg No/ 14/11/848 – 201 No. A); and
- Landscape Layout (Drg No. M3046 – PA – 02 – V12, Rev A).

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## Overview of Planning Application

A full planning application was submitted to the Local Planning Authority for the following development '*Erection of 47 Residential dwellings*' (LPA Ref. FUL/2024/O192). This planning application which sought full planning permission was validated on the 15<sup>th</sup> October, 2024.

Following this submission, various consultees provided their comments and feedback on the proposal. These were received over the following months. In response to the comments provided, Pegasus Group prepared and submitted to the Local Planning Authority a Proposed Revision Letter (Ref. LO01v1 PL – Proposed Revisions Letter – 9.12.2024) on the 16<sup>th</sup> December, 2024. The purpose of this letter was to address, inter alia, the following matters: the layout of the proposal and impact on the Fitz, a Grade II Listed Building, housing standards, affordable housing, Open Space, Ecology/Trees/BNG whilst other matters were discussed including Site Access. Within this response, it was agreed that Plot 13 would be relocated, a more free-flowing development would be designed and that various amendments would be had to submitted drawings.

On January 29<sup>th</sup>, 2025, the delegated Planning Officer provided their formal response to the abovementioned Revision Letter. The principal concern raised within the Officer's response concerned the density of the proposed development and the perceived subsequent impact on the existing character of the Site and the adjacent Grade II Listed Building, 'The Fitz'. It is reasonable to interpret from the aforementioned letter that the Planning Officer preferred the proposed Site Layout Plan approved under planning permission 2/2018/O537, which included fewer properties and an alternative architectural approach. The letter outlined the need to adhere to relevant planning policy concerning housing standards, an aim to include 40% affordable units, and to correct the biodiversity net gain metric as per Natural England's suggestions. 'The Planning Officer also asked for amendments to be made to submitted documents pertaining to ecology and highways.

Following this formal response from the Authority, Pegasus Group prepared a planning addendum package addressing these comments. This submission was accompanied by a Planning Addendum Letter prepared by Pegasus Group (Ref. LO01v1 PL – Planning Addendum – 02.05.2025) and various technical documents including amended drawings, amended Design and Access Statement, amended Biodiversity Impact Assessment. Through this submission, various planning matters were addressed including the Site Layout, Design, Impact on Listed Building, Housing Standards, Affordable Housing, Ecology/Trees/Biodiversity Net Gain, Flood Risk and Highway impacts.

Since the submission of the abovementioned planning addendum, it is recognised that the planning application has been subject to re-consultation and comments have been received in relation to ecology, BNG, Highways and the Local Lead Flood Authority. Additional comments were provided by the Environment Agency pertaining to flood risk. The contents of these responses are outlined below followed by Pegasus Group's formal response to them. Where appropriate, the comments from the consultees have been copied directly and highlighted in blue text and italicised.



### *Ecology/BNG*

The Local Authority ecologist has confirmed that the submission of the revised Biodiversity Statement is considered acceptable. In their response, they also outlined the need for erect four bird boxes at suitable locations across the Site. Additionally, a Construction Environmental Management Plan (CEMP) was requested to be submitted to the Authority. It is anticipated that this document as well as the need for bird boxes could be conditioned as part of a planning permission. The Ecologist raises no other concerns pertaining to Ecology.

Therefore, taking into account the contents of the response provided by the Authority's ecologist, it is considered that matters pertaining to Ecology and BNG are resolved with no outstanding items pertaining to these matters to consider at this stage.

### *Highways*

*It is accepted that the access has been established through previous planning permissions 2/2018/0537 & OUT/2019/0028 and has been implemented, however this current application seeks to increase dwelling numbers and with-it vehicle trips at this access over the previously approved. Given the length of time between the original approval and changes in local design requirements, we believe it prudent to adjust the alignment of the existing walls to be behind the visibility splays, in both directions. This will enable better maintenance of the visibility splays and allow the footpath access to come forward as detailed in the Transport Statement TS-784-B050321.*

The Highway Authority acknowledge the access is established through previous consents which have been implemented. The reasoning for setting the wall behind the visibility splays is also discussed elsewhere in their response and the main reason appears to be to enable an object height of 600mm to be seen at the end of the visibility splays. It needs to be acknowledged that the wall in question is a retaining wall that in fact retains the public highway, so our solution is to lower the relevant section of stone wall to 500mm above carriageway level. This will ensure that there are no obstructions in the visibility splay greater than 500mm. Therefore, the object height of 600mm at the end of each 120m splay will be clearly visible. Notes have been amended accordingly on the Site Plan drawing.

*The applicant has submitted an Amended Dwg. – Site Plan 14/11/848-201b which details changes requested by the LPA and includes a roundabout and various design changes, it does not however address many of the points raised by the LHA in our previous response.*

*Our previous comments detailed below are still valid and require further consideration by the applicant.*

*With the above in mind it is the view of the LHA that is prudent to adjust the alignment of the existing wall to the west, relocating it behind the proposed visibility splay on a gradual taper to the access point, as proposed, drivers are looking across a section of wall over a distance of approx. 70m it is a logical conclusion to set it back allowing for the frontage verges to be better maintained.*



Please refer to comments above.

*We would also require the eastern wall removed entirely as this again will allow for easier and better maintenance of the visibility splays and general area, it will also allow the proposed crossing point detailed in the TS to come forward, currently this is omitted from the Site Plan but is detailed on Dwg – Proposed Site Access A106284-C001 in the Transport Statement.*

The length of eastern stone wall is existing and should remain as it gives character to the site entrance. Our solution here is the same as for the western splay in that the wall should be lowered to 500mm above carriageway level. The note on the Site Plan drawing has been amended accordingly.

*We understand that this will have an effect on the proposed gateway entrance to the development but we are willing to work with the applicant to find a suitable solution to this.*

- *Please can the applicant submit their proposals for the above changes.*

Please refer to comments above.

*Again we draw your attention to the detail of the visibility splay looking west, as presented on the Site Plan 14/11/848-201 b it is drawn to 100m, in previously approved applications and as detailed in the provided TS-784-B050321 in Doc – Proposed Site Access A106284-C001 it is 120m, for the avoidance of doubt the Site Plan needs to be amended to the correct splay distance of 120m and included the crossing point.*

Please see comments above. The Site Plan drawing has been amended accordingly and submitted to the Local Authority.

*The native hedge as detailed on Dwg – M3046-PA-02-V11 Landscape Layout, where the new access crosses the shared use path, careful consideration is required in this location to secure inter-visibility between pedestrians/cyclist and vehicles, the hedge will need to be set back and possibly splayed so that users are not hidden from view and will be required to be maintained to a maximum height of 600mm.*

Landscape Layout amended accordingly, and submitted alongside this Planning Addendum.

*The greyed transition point detailed on the site plan at the shared path crossing point needs to be removed as it could imply cyclists/pedestrians having priority over vehicles in this location, the adjacent carriageway speed is 40mph and due to this vehicles will have priority at the access point.*

The Site Plan drawing has been amended accordingly and submitted to the Authority.

*The shared path meets the criteria for being a local access route, the applicant will need to also demonstrate there is adequate visibility splays and SSD's [safe stopping distances] for cyclists*



*travelling at 12mph = 15m of visibility splay. Further detail of the give-way markings and signage in this area is also required.*

Adequate visibility splays are shown on the submitted drawings. Details of give way markings and signage can be controlled by planning condition. The applicant will accept a pre-commencement planning condition relative to detailed road design.

*There has been concerns raised for the development access in relation to the visibility splay looking east being in close proximity to the trees, it should be noted that this is the furthest extent that the splay can extend too, but it is not fully required, as noted on in the TS - Dwg - Proposed Site Access A106284-CO01, 120m in both directions met the criteria in relation to the speed survey undertaken at the time.*

- *Please can the applicant amend the plan to detail correct visibility splays, submit details for visibility splays for cyclists, alterations to hedge line and details for required give way markings and signage for the shared use path.*

The western and eastern visibility splays have been amended on the Site Plan to show 120m. The visibility splay for cyclists has been addressed in terms of hedge lines and wall/ pillar heights. The road marking/ signage can be controlled by pre-commencement planning condition relative to detailed road design.

#### *Transport Statement and Cycling & Walking (Active Travel)*

*We note in the Planning Addendum. "The Applicant is willing to enter into a Section 278 Agreement prior to the occupation of development to provide the requested pedestrian access drop kerbs including tactile paving and central reservation at the bus stop 400m west of the site to encourage multi modal trips"*

- *This is welcomed by the local planning authority, this will need to be detailed on a scaled plan to be approved by the LPA.*

This can be controlled by an appropriately worded planning condition.

#### *Internal Layout*

*Again, the Amended Site Plan 14/11/848-201 b has not considered points made in our previous comments and you may wish to consider the following when approving this application as these points do pose a concern from a highway safety perspective. The LHA accepts that this development will ultimately remain private, however we do encourage the applicant to build to an adoptable standard which would allow for future adoption should it be required. This will also ensure that the future residents have access to a well-constructed and functioning road network within the estate.*



This is an accepted norm on private roads. The applicant will accept a pre-commencement planning condition relative to detailed road design. For clarity, the road will be constructed to adoptable standards but will remain private and maintained in perpetuity by a management company.

*Noted on the Dwg - M3046-PA-02-V11 Landscape Layout proposed ornamental hedges are proposed throughout the development adjacent to the footways and at driveway access points, these are to be maintained at 1.5m height, which will reduce intervisibility severely throughout the development, it should be noted that where a boundary finish is adjacent to a footway the optimum height for fences/walls etc is 600mm over a 2m distance to provide a 2m x 2m footway splay in line with visibility requirements under MfS 2. In all other areas hedgerows/fences should be maximum height of 1.05m*

All drawings amended accordingly to show hedgerows and wall/ pillar heights at max. 600mm high where necessary.

*Footways at junctions to shared surfaces should have a maximum radius of 3m and need to continue up into the junction bell mouth, where these footways meet a shared surface, the footway must continue past the transition point to enable pedestrians to move from footway to shared surface seamlessly.*

The Site Plan drawing has been since been reviewed and amended accordingly so that footpaths extend to the rear of the rumble strips that delineate the start of each shared surface road.

*Footways at junction for plots 3 & 6, 21 & 24 require tighter radius and taken beyond the transition point.*

Radius sense checked and adjusted to 6m where required. Footpaths extended to rear of rumble strip. Site Plan amended.

*The footway at Plot 20 needs to continue up to the transition point, or the transition point changed to meet the footway.*

Footpath extended to meet the transition point. Site Plan amended.

*Footway outside of plots 34 & 28, needs extended beyond the transition point, there also appears to be a set of pillars detailed? these can be within the footway but they should be set back to a point past the shared surface transition point so pedestrians can access this unimpeded.*

Footpaths extended to rear of rumble strip and pillars re-located. Site Plan amended.

*It would advantageous if a additional footway link can be established to the shared use path over the grassed area adjacent to Plot 39, this would allow for better permeability and therefore access to the bus stop.*



This suggestion isn't achievable for two reasons. Firstly, there is a steep banking with a circa 2m drop down to the existing footpath and secondly, a link path in this area would cut through an existing structure landscaping zone which would be to the detrimental to the landscape screening.

#### *Transport Statement (Amended)*

Additionally, in support of this planning addendum, an amended Transport Statement (TS) has been prepared by Tetra Tech (Ref. 784-B050321). The supporting TS outlined the junction layout and visibility splays based on a speed survey. The report evaluated the site's accessibility by foot, bike, and bus and assessed the potential impact of the traffic generated by the development. The Site was found to be accessible with amenities within walking, cycling, and public transit distance. The development, to be accessed from Low Road with planning-approved visibility splays, is expected to remain safe and efficient. Car parking provision was planned in accordance with the CCC parking design guidelines. Traffic analysis using TRICS suggested that the additional traffic from the development would have a negligible impact on the local road network. Considering the safety record of the area, with no accidents reported in the preceding five-year period, it was anticipated that safety would not be compromised.

Therefore, it was concluded that there was no transport-based reason to withhold consent for the planning application.

#### *Amended Site Plan*

In response to the comments provided by the Highways Authority outlined above, an updated Site Plan (Drg No. 14/11/848 – 201, No. C) has been submitted to the Authority as well as a Site Plan (reduced scale for BNG purposes) (Drg No. 14/11/848 – 210, Rev A).

Therefore, taking into account all of the above, the contents of the amended Transport Statement as well as the provision of the amended Site Plans, it is considered that the comments from the Highways Authority have been adequately addressed.

#### *Lead Local Flood Authority*

This section of the Planning Addendum letter seeks to address the comments raised by the Lead Local Flood Authority. For clarity, their response has been copied directly below in blue and italicised.

*The applicant needs to provide further detail regarding the surface water drainage aspects of this application, again this information has been detailed as bullet points.*

*Notwithstanding the above, the LLFA is the statutory consultee in respect of surface water drainage and surface water flooding to the LPA, the main flooding dynamic in this instance is river flooding from the Derwent (main river).*



*Flood events in recent years in this locality have been beyond the the 1 in 100 yr +40% CC events, the most recent being Storm Desmond in 2015, the resulting effects of these events should be considered in respect of the long term viability of the proposed development.*

*While the applicant proposes to raise the development land to protect the housing by land raising resulting in a refuge area, the access and egress of residents and emergency will be hampered if not stopped entirely by flood water along the C2064 Low Rd, because of this the LLFA must question the viability and sustainability of development in this location.*

*The LLFA also disagrees with the conclusions of the Sequential & Exemption test (the development will increase flooding locally).*

*A flood evacuation plan has been submitted to support this application, the very inclusion of a document of this nature should again raise the question of long term viability of development in this location, even if, and despite the possibility the criteria can be met, a pragmatic approach needs to be considered recognising the particular risk intrinsic to this locality.*

*Recent flood modelling provided in support of the application is also not fully complete as it was run without the 1 in 1000yr data from the EA, (the model needs re-run on receipt of the data) however it details an increased flood risk in a 1 in 100yr =40% CC event to nearby infrastructure namely the water treatment works and increase in flood depth on the C2064 Low Rd, this calls into question the validity of the Sequential & Exemption test conclusion.*

*It also concluded that a estimate value for the date shows that the development platform would be susceptible to flood waters in that extreme event, thus it will not be protected beyond a 1 in 100yr 40% CC event, and the local area has experienced these events in recent times.*

*With the above in mind the LLFA has no alternative but to recommend refusal to the LPA for the following reasons*

*Refusal: The Local Planning Authority considers that the proposed development will increase the flood risk to nearby infrastructure. The potential for increased flooding poses a threat to the safety and integrity of existing structures and could lead to substantial economic and environmental damage, there is also a risk to the general public and emergency services during storm events with no dry access proposed.*

In response to the comments made by the LLFA, the previously submitted Flood Risk Assessment has been amended to take into the abovementioned comments. A summary of this FRA has been provided below.

A revised Flood Risk Assessment has been produced (Ref. 24-002-002, Rev P6, Dated 1<sup>st</sup> September, 2025) which identifies the site as being within Flood Zone 2 and a Sequential Test was thus, required. As part of the drainage strategy, surface water was planned to be discharged into the existing, unnamed watercourse to the west of the site at a restricted rate of 5.9 l/s/ha, established by prior planning permissions. This system was designed to manage a 1 in 100-year



critical storm event, accounting for a 50% climate change and 10% urban creep increase, with on-site attenuation aided by oversized pipes and attenuation tanks. The development proposal was found to carry a low to very low risk of various types of flooding and was deemed appropriate and sustainable as per the National Planning Policy Framework, based on the controlled, agreed-upon discharge rate.

It is noted however that in their response, the LLFA did not agree with conclusions of the Sequential & Exemption test prepared by Pegasus Group (P24-2881 Reference: 002 – Dated 1<sup>st</sup> May 2025), on the basis that the Exception Test could not be passed due to the development increasing flood risk off-site.

On the basis that the submitted FRA confirms that *'Following raising of site levels, compensatory storage works on and off site and inclusion of a raised flood wall offsite, the development site will be in a Flood Zone 1 (Low Probability) area and will be at no risk of flooding from rivers or sea or from reservoirs and there will be no increase in flood extent or depth elsewhere.'*

As a result, it is considered that both the Sequential Test and Exception Test is passed.

#### *Environment Agency*

In their response to the Planning Addendum submitted in May, the Environment Agency noted the site's complex history of previous remodelling and development applications, and raised concerns about flood risk, highlighting that parts of the site fall within Flood Zone 3, an area of high risk.

The main objection from the Environment Agency included the lack of proof of safety against extreme floods, increased flood risk elsewhere, notably at the Wastewater Treatment Works and Low Road, and a missed opportunity to reduce flood risk through natural methods and insufficient compensatory storage measures. Technical issues regarding Finished Floor Levels, evacuation and emergency access, and flood modelling inconsistencies were also noted. The Environment Agency recommended a revision of the FRA addressing all comments made.

In response to the comments provided by the Environment Agency, an amended Flood Risk Assessment has been submitted to the Authority. The amended FRA confirms the following:

*'Following raising of site levels, compensatory storage works on and off site [within the freehold ownership of the Applicant] and inclusion of a raised flood wall offsite, the development site will be in a Flood Zone 1 (Low Probability) area and will be at no risk of flooding from rivers or sea or from reservoirs and there will be no increase in flood extent or depth elsewhere [outwith land in the freehold ownership of the Applicant]....The proposed development will have a low to very low risk of flooding from rivers and sea, surface water, reservoirs and sewers and will discharge at a controlled, restricted rate as advised by the local authority. This Flood Risk Assessment has confirmed that the proposed development is appropriate and sustainable in the terms as set out in NPPF.'*



Therefore, based on the contents of the amended FRA, it is considered that the Site in its entirety, with respect to flood risk is acceptable. Additionally, as outlined above, the proposed development would not increase the risk of flooding outwith land in the freehold ownership of the Applicant thus satisfying the comments raised by the EA.

### **Other Relevant Material Planning Considerations**

There are additional material planning considerations that are of particular relevance to the proposed development. These are as follows and explored in greater depth below:

#### 1) The Local Planning Authority's 5 Year Housing Land Supply (5YHLS)

The Five Year Land Supply Addendum for the former Allerdale area of Cumberland Council provides an interim position as of June 2025, based on housing supply data up to 31<sup>st</sup> March 2024. Following changes to the National Planning Policy Framework in December 2024, the Council has used the revised Standard Method to calculate housing need, resulting in an annual requirement of 412 dwellings for Allerdale (including a 5% buffer due to strong past delivery rates). Over the next five years, this equates to a total need of 2,058 homes. The current deliverable supply stands at 1,896 units, comprising large and small sites with planning permission and a windfall allowance. Consequently, the Council can demonstrate a **4.6-year** housing land supply, which falls short of the required five years.

This means that, as highlighted in Planning Practise Guidance, if an Authority cannot demonstrate a 5 year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply, as set out in Paragraph 11d of the National Planning Policy Framework. Specifically, Paragraph 11d stipulates that *'where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date...planning permission should be granted unless the impacts significantly and demonstrably outweigh the benefits'*. Footnote 8 of the NPPF confirms that *'This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites'*.

It is noted however that in order to trigger the presumption in favour of sustainable development, parts (i) or (ii) of Paragraph 11d need to be met.

When considering Paragraph 11d of the NPPF, and in particular footnotes 7 and 9, it is clear that there are no protected areas or assets of particular importance that would provide strong grounds for refusing the proposed development. The amended FRA demonstrates that the scheme would not be exposed to unacceptable levels of flood risk, nor would it increase flood risk in the surrounding area. Furthermore, the site is sustainably located (as evidenced in the amended Transport Statement and the fact that the site is an identified Housing Commitment in the Local Plan), makes efficient use of land, and delivers both affordable housing and much-needed market dwellings in an area where the Authority cannot currently demonstrate a five-year housing land supply. The development's impact on the significance of the setting of the Fitz, a Grade II Listed Building, located nearby has previously been discussed in previous planning addendum which concluded that *'Overall, the proposed development would not be prominent within the setting of*



*the Fitz and would not impact on the contribution of setting to the significance of the listed building, or the ability to appreciate that significance, any more than the approved, extant development.'*

Therefore, while it is recognised that there are differences of opinion regarding aspects of the scheme's design, it is unreasonable to suggest that these concerns would significantly and demonstrably outweigh the clear benefits of the proposed development. All other planning consideration as outlined in footnote 7 are considered to be appropriately accommodated through either this submission or previous planning addendum submissions.

On balance, given the benefits associated with the proposal as outlined above, coupled with the Authority's current 5YHLS, it is considered that the presumption in favour of sustainable development should apply to the proposal due to the contents of Paragraph 11d of the NPPF, PPG and the proposal's adherence to the relevance provisions as noted above.

## 2) Housing Commitment

Notwithstanding the above, another key planning consideration is that part of the Site is identified as a Housing Commitment land in the Authority's Local Plan. Specifically, part of the Site is recognised as being contained within land allocated within the Local Planning Policy as 'Housing Commitment' namely, the land located towards the West of the site. However, part of the Site is also contained within land allocated as 'Green Infrastructure – Policy SA52'. This is critical to note as the Site benefits in part from a Housing Commitment Allocation.

However, it is acknowledged that part of the Site, the eastern parcel is contained within land allocated as 'Green Infrastructure – Policy SA52'. Despite some loss of low-value ecological features, substantial tree and ecological planting will maintain and elevate existing wildlife linkages. The submitted BNG document, since found to be acceptable by the Council's Ecologist, demonstrates that the development will achieve a at least a 10% BNG thus demonstrating that the proposal is providing ecological benefits. In doing so, the development complies with several key planning policies: S24 and S35 of the ALLPP1 that support green infrastructure enhancement and biodiversity protection; SA1 and SA52 of the ALLPP2 that encourage alignment with local plans while safeguarding designated green spaces; along with Paragraphs 180 and 186 of the NPPF that advocate for biodiversity gains and protection of natural areas. The development's integration of ecological elements and dedication to preserving and enhancing green spaces make it a sustainable, policy-compliant development.

Taking all of the above into account, it is important to note that part of the site is allocated as 'Housing Commitment', while the remainder is designated as green infrastructure. However, the proposed development would deliver clear benefits, including the delivery of affordable and market housing in an area with an identified need, meaning it aligns with the Local Plan as a whole.

## Summary

Pegasus Group, on behalf of Lakeland Leisure Ltd, has submitted a planning addendum for application FUL/2024/0192, proposing 47 dwellings at Land South of Low Road, Cockermouth, to



address outstanding issues and support a positive determination. The revised submission includes an updated Flood Risk Assessment, Transport Statement, and amended site and landscape plans.

Key matters addressed include Highway concerns which have been partly resolved through the provision of an updated Site Plan, whilst residual issues considered appropriate to be addressed via suitably worded planning conditions. The amended Transport Statement concludes the development is safe, accessible, and has negligible traffic impact.

The Lead Local Flood Authority and Environment Agency previously raised concerns about localised flood impacts; however, the applicant's amended FRA confirms that the site will be raised into Flood Zone 1 with compensatory storage and controlled discharge, ensuring no increase in flooding outwith land in the freehold ownership of the Applicant. On this basis, the development is considered safe in flood risk terms and poses no threat to existing or future residents or the wider area. Furthermore, the Sequential Test and Exception Test is passed.

In addition, given Cumberland Council's housing supply shortfall (4.6 years), the presumption in favour of sustainable development applies, and with the Site partly allocated as Housing Commitment, Pegasus consider that the scheme's benefits, including affordable housing, market housing delivery (especially when considering the Council's 5YHLS) significantly outweigh all outstanding negative impacts of the development.

Pegasus Group looks forward to receiving a formal response from the Authority and is confident that the information submitted will support a positive assessment and assist in progressing the application to determination.

We trust that the contents of this letter, together with the accompanying documents, address the matters raised and are of assistance. Should you have any questions or require further clarification, please do not hesitate to contact me.

Yours sincerely,

**Dominic Waugh**  
**Senior Director – Planning**

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Enc.