

Design Code Viability Appraisal

LUC

October 2025

Introduction

1.1 This report has been prepared by LUC for Westmorland and Furness Council. It assesses the development viability implications of the consultation draft Westmorland and Furness Design Code SPD in a qualitative manner.

1.2 The Design Code supports the existing policies of the three legacy local plans in Westmorland and Furness respectively covering the former Barrow, Eden and South Lakeland local planning authority areas. The design code also supports the policies, guidance and design codes of the made neighbourhood plans in the district.

1.3 This assessment is a high level overview. Further detail is available in the viability assessments prepared as part of the evidence bases for the adoption of each legacy local plan.

1.4 This report reviews the viability implications of the requirements (code) contained in the design code. The components of the code that are guidance are not assessed because the code sets requirements for new development, whereas the guidance is advisory and the dissemination of best practice.

1.5 This report is a qualitative assessment of the code for Greenfield Homes Large (ten or more homes), as, of all thirteen development types within the design code, this chapter has the broadest range of code within it. Other new homes chapters: Greenfield Small (less than 10 homes), Brownfield Large (ten or more homes) and Brownfield Small (less than 10 homes) use variations of the Greenfield Large (ten or more homes) code and omit the codes that do not apply to these development types.

1.6 This report also considers the qualitative viability implications to the development types that do not involve housebuilding: Business (Brownfield / Greenfield), Holiday Parks and Cabins, Shopfronts and Other development. The general design principles of the greenfield homes code concerning topics such as context, SuDS, movement and identity are transferrable to these other development types.

1.7 The detailed viability assessments of the local plan policies that the Design Code supports are:

Barrow

Local Plan Viability Assessment (2016):

<https://www.barrowbc.gov.uk/sites/default/files/attachment/6000.pdf>

(the above link is from the Barrow Examination and Evidence Library:

<https://www.westmorlandandfurness.gov.uk/sites/default/files/2025-03/Barrow%20Examination%20%26%20Evidence%20Library.pdf>)

Eden

Economic Viability Appraisal (2009): <https://www.eden.gov.uk/media/3105/eb011-economic-viability-appraisal-october-2009.pdf>

Appendices: <https://www.eden.gov.uk/media/3106/eb011-economic-viability-appraisal-october-2009-appendices.pdf>

Economic Viability Appraisal Refresh (2013):
<https://www.eden.gov.uk/media/3107/eb012-nps-refresh-of-dtz-2009-economic-viability-assessment.pdf>

2015 Refresh of DTZ (2009) Economic Viability Assessment (not available online)

(the above links are from the Eden Local Plan Evidence Base:

<https://www.westmorlandandfurness.gov.uk/sites/default/files/2025-08/Eden%20Local%20Plan%20Examination%20Library%20Schedule.pdf>)

South Lakeland

South Lakeland Development Management Policies DPD and CIL Viability Assessment (2017): <https://www.southlakeland.gov.uk/media/4777/south-lakeland-viability-study-final.pdf>

Appendix 1: Policies Matrix:

<https://www.southlakeland.gov.uk/media/4440/appendix-1-policies-matrix.pdf>

Arnsdale and Silverdale AONB DPD Viability Report (2017):

<https://www.southlakeland.gov.uk/media/4779/aonb-viability-study-2017-final.pdf>

Appendix 1: Policies Matrix:

<https://www.southlakeland.gov.uk/media/4478/appendix-1-aonb-policies-matrix.pdf>

(the above links are from the South Lakeland Local Plan Evidence Base:

https://www.westmorlandandfurness.gov.uk/sites/default/files/2025-03/Evidence%20Base_legacy%20SLDC_to%20April%202023.pdf)

Qualitative Assessment of the Greenfield Homes (10+) Design Code

Summary of Findings

1.8 The requirements of the design code support the design policy requirements of the district's legacy local plans and do not harm or undermine the viability of development. In line with its intended purpose the design code:

- does not set requirements that exceed or are more prescriptive than those of the legacy local plans or national policy that has been published since the legacy plans were adopted.
- supports the legacy local plan and neighbourhood plan design policies by demonstrating *how* applicants can meet the requirements of the design policies by providing clarity on the policies' binary requirements (code) versus desired design outcomes and best practice (guidance). This includes text, illustrations and photographs that demonstrate how design can meet the requirements of the code in different manners and in different situations.
- brings together the requirements of legacy local plans, neighbourhood plans, supplementary planning documents, and guidance into a primary reference for the design of new development in the district.
- explains how good design can be achieved with reference to different types of development and in different contexts.
- demonstrates that its requirements are practical and achievable by highlighting best practice in previous developments in the district and elsewhere in the country that have been delivered by developers through the planning system.
- signposts the reader to more detailed policy, technical requirements, supplementary planning documents and guidance. The latter includes the summary character appraisal and baseline that accompany the design code.

1.9 The design code requires the design of new development to make a meaningful response to the site and its context rather than the imposing of a narrow set of 'one size fits all' requirements or parameters to the design of new development. A highly prescriptive code would not be practical or feasible in a geographically large and diverse district of many landscapes and settlements, where viability changes from place to place.

1.10 The design code divides the very large and wide-ranging concepts of 'high quality design' and 'locally distinctive design' into sections of code and guidance with checklists for applicants to understand the site and its context, and checklists for reviewing the proposal's compliance with the code. These components of the

code support the designer in identifying and developing site and place specific proposals and influencing and informing the design approach to be used, rather than inhibiting creative design or the viability of schemes.

1.11 While the code sets clear parameters and provides options, none of these are considered to compromise the viability of development any more than the existing legacy plan policies that the code supports.

Qualitative Assessment

1.12 Tables 1 to 6, below, provide a qualitative overview of the viability implications of the Design Code. After each table, other relevant qualitative viability implications are listed after each table under the following subheadings:

- Achieving Planning Permission
- Development and Construction
- Lifetime Costs: occupation, maintenance, adaptability and re-use

1. Context

Table 1: Qualitative Viability Assessment of the Context Codes of the Greenfield Homes Large (10 or more homes) Design Code

Code ref no.	Topic / Description	Comment
GHL 1.1	Character Areas: the design must be informed by National Character Areas and Cumbria Landscape Character Areas	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 1.2	Surroundings: the design must respond to the character of the existing built and natural environment of the site's surroundings	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 1.3	Site analysis: the design must be informed by an analysis of the characteristics, constraints and opportunities of the specific site	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 1.4	Setting: the applicant must identify whether their proposal falls within or affects the setting of any	No impact on viability compared to the existing local plan policies.

Code ref no.	Topic / Description	Comment
	landscape, ecological, cultural, and historic sites or designations.	This is a requirement of all three legacy local plans.
GHL 1.5	Historic Assessment: the design must demonstrate a positive response to the existing historic landscape and townscape context and any heritage assets affected.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.

Achieving Planning Permission

1.13 The codes in the Context section will make the process of achieving planning permission more efficient by:

- Setting out the Local Planning Authority's requirements concerning how design must respond to the site and its context for planning applications, including which sources of data and information should be used. This should save time and money in the pre-application and application process.
- Informing applicants of useful datasets and sources of information that have been published both before and since the legacy local plans have been adopted. This assists with the efficiency of the design process.
- Providing a stepped approach to the applicant's assessment of the site and its context to inform the overall design approach, and the design and access statement.

2. Climate

Table 2: Qualitative Viability Assessment of the Climate Codes of the Greenfield (ten or more homes) Design Code

Code ref no.	Topic / Description	Comment
GHL 2.1	Sustainable building materials: the design must use sustainable and low carbon construction materials and methods, including re-use, considering future adaptation, and whole life costs	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 2.2	Flood risk: the design must contribute towards reducing flood risk and the potential impacts of flooding	No impact on viability compared to the existing local plan policies.

Code ref no.	Topic / Description	Comment
		This is a requirement of all three legacy local plans.
GHL 2.3	Sustainable drainage: the design must integrate appropriate Sustainable Drainage Systems	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 2.4	Resilient public spaces: public realm and amenity space must be designed to be resilient to climate change and extreme weather events.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 2.5	Passive solar gain: the design must maximise passive daylight and solar gains in combination with natural ventilation and shading.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 2.6	Energy efficiency: the design must demonstrate how it promotes energy efficiency and generates renewable energy	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.

Achieving Planning Permission

1.14 The codes in the Climate section will make the process of achieving planning permission more efficient by:

- Providing clarity over the Local Planning Authority's requirements with regard to climate change response and preparedness, and suggesting how this can be designed in to proposals. This includes local examples of what is being required by the code.
- Setting out the requirements of the Council as the local Highway Authority, and Lead Local Flood Authority, and incorporating the requirements of United Utilities and Northumbrian Water as the organisations responsible for the infrastructure of the district's water and wastewater network, including drainage.

- Ensuring factors, such as SuDS and drainage, that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.

Development and Construction

1.15 The codes in the Climate section will improve the viability of development and construction by:

- Ensuring factors that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.
- Making homes cheaper, safer and more comfortable to occupy by lowering energy consumption, incorporating renewable energy and designing-in flood prevention and response measures. These benefits would be attractive to potential occupants, and homes would be easier to market.
- Making homes more adaptable and ‘future proof’ for the different lifestyles and life stages of their occupiers. These benefits would be attractive to potential occupants, and homes would be easier to market.

Lifetime Costs: occupation, maintenance, adaptability and re-use

1.16 The codes in the Climate section will lower the lifetime costs of new homes by:

- Supporting the use of long-life, low carbon and reusable materials and building methods in new homes.
- Supporting new homes that are more energy efficient, more comfortable to occupy and generate renewable energy, which makes them cheaper to run.
- Reducing the potential costs associated with retrospectively adapting homes and places to extreme weather events, floods and climate change.
- Supporting homes that can be adapted and changed in ways that are not energy, time and carbon intensive.

3. Nature

Table 3: Qualitative Viability Assessment of the Nature Codes of the Greenfield (10 or more homes) Design Code

Code ref no.	Topic / Description	Comment
GHL 3.1	Green and blue infrastructure: the design must integrate with and improve green and blue infrastructure networks	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.

Code ref no.	Topic / Description	Comment
GHL 3.2	Open space: the open spaces of the design must incorporate nature appropriate to the scale of development and type of space	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 3.3	Inclusive access: the design must enhance or maintain people's access to nature and natural environments.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 3.4	Biodiversity protection: the design must identify, then conserve or enhance priority habitats and species	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 3.5	Biodiversity net gain: developments must achieve a minimum 10% increase in biodiversity.	No impact on viability in the district, as this is a requirement across England via the National Biodiversity Net Gain Policy 2023 onwards.
GHL 3.6	Existing trees and hedgerows: the design must retain and protect existing trees and hedgerows and incorporate new where possible to enhance biodiversity and green infrastructure.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 3.7	Street trees: the design must prioritise the incorporation of street trees.	No impact on viability in the district, as this is a policy of the National Planning Policy Framework (NPPF). There is a similar requirement in all three legacy local plans.

Achieving Planning Permission

1.17 The codes in the Nature section will make the process of achieving planning permission more efficient by:

- Providing certainty as to what is required by the Local Planning Authority, and how, in terms of designing nature protection and enhancement into the design for planning applications. This includes local examples of what is being required by the code.
- Ensuring factors, such as open spaces, green and blue infrastructure, that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.
- Bringing national and local requirements together in one document.

Development and Construction

1.18 The codes in the Nature section will improve the viability of development and construction by:

- Ensuring factors that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.
- Providing suitable, nature-rich spaces within developments and / or improving access to nature. These benefits would be attractive to potential occupants, whether buyers or renters.
- Providing a better local green and blue infrastructure network. This benefit would be attractive to potential occupants, whether buyers or renters.

Lifetime Costs: occupation, maintenance, adaptability and re-use

1.19 The codes in the Nature section will lower the lifetime costs of new homes by:

- Improved microclimate via suitably located and designed green spaces and the provision of street trees. This could have benefits for heating, cooling, lighting and shading rooms.

4. Movement

Table 4: Qualitative Viability Assessment of the Movement Codes of the Greenfield (10 or more homes) Design Code

Code ref no.	Topic / Description	Comment
GHL 4.1	Route hierarchy and integration: routes and streets must have a clear hierarchy that is integrated with the routes and streets of the site's surroundings.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.2a	Street design: the design must prioritise sustainable and healthy modes of travel.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.2b	Street design: street and route designs must cater to all users and ensure ease of access.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.2c	Street design: street and route designs must be permeable, well-connected and easy to navigate.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.3	Active travel: the active travel network of the design must integrate with wider green infrastructure networks	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.4	Public space network: public spaces in the design must form part of an overall network and hierarchy of spaces and be well-designed.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.5	Public space design: public space must be attractive, inclusive, safe, flexible and	No impact on viability compared to the existing local plan policies.

Code ref no.	Topic / Description	Comment
	vibrant in order to promote interaction between people.	This is a requirement of all three legacy local plans
GHL 4.6	Lighting: lighting in the public realm must ensure safe and attractive environments.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.7	Light pollution: the design must avoid or minimise light pollution.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 4.8	Car parking: provision and design must align with the Development Design Guide	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.

Achieving Planning Permission

1.20 The codes in the Movement section will make the process of achieving planning permission more efficient by:

- Providing certainty as to what is required by the Local Planning Authority, and how, in terms of the movement network, integration, inclusiveness and design for planning applications. This includes local examples of what is being required by the code.
- Ensuring factors, such as movement networks and access points, that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.
- Signposting to the relevant local requirements such as the Development Design Guide and Lighting Technical Advice Note.

Development and Construction

1.21 The codes in the Movement section will improve the viability of development and construction by:

- Ensuring factors that could have significant implications for numbers of units and layout, such as the highway network, design and specification, are considered by the applicant early in the design process.

- Supporting highway and movement network design that is not over-engineered or creates an overprovision of carriageways, pavements or parking spaces. This can assist with enabling higher densities, reducing costs, and/or incorporating better public and green spaces in the design.
- Providing attractive, safe and convenient movement networks and public spaces within developments. These benefits would be attractive to potential occupants, whether buyers or renters.
- Designing-in a choice of transport modes and encouraging active travel. This benefit would be attractive to potential occupants, whether buyers or renters.

Lifetime Costs: occupation, maintenance, adaptability and re-use

1.22 The codes in the Movement section will lower the lifetime costs of new homes by:

- Promoting and supporting active travel, the cheapest and most environmentally friendly modes of travel.
- Promoting safe and inclusive environments that provides greater sense of pride and local connection, and reduces the fear of crime and need to retrofit crime prevention or deterrents.
- Well thought through and considered design that is less likely to need re-design, alteration or retrofit at a later date because it does not function as intended.
- Durable, attractive and long-lasting highway and public realm materials.

5. Built Form

Table 5: Qualitative Viability Assessment of the Built Form Codes of the Greenfield (10 or more homes) Design Code

Code ref no.	Topic / Description	Comment
GHL 5.1	Urban grain: the proposals must identify and respond to the surrounding urban grain and 'knit into' the townscape or surroundings.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 5.2	Building line: the design must incorporate uniform or varied building lines in response to its	No impact on viability compared to the existing local plan policies.

Code ref no.	Topic / Description	Comment
	context and provide a suitable character via building lines.	This is a requirement of all three legacy local plans.
GHL 5.3	Building height: the height of buildings must respond to the context assessment and any historic assessment of the site.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 5.4	Density: higher dwelling densities will be sought in more accessible sites and where it 'knits in' to the context. Density is to vary across larger sites where possible.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 5.5	Housing suitability: in rural areas housing design must be appropriate to its surroundings.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 5.6	Accessibility: designs must meet the Building Regulations accessibility requirements stipulated in the legacy local plans.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 5.7	Security and safety: public and communal spaces must be designed to reduce the opportunity for crime and fear of crime.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans

Achieving Planning Permission

1.23 The codes in the Built Form section will make the process of achieving planning permission more efficient by:

- Providing certainty as to what is required by the Local Planning Authority, and how, in terms of the urban grain / layout, building forms, building heights and densities for planning applications. This includes local examples of what is being required by the code.

- Ensuring factors, such as urban grain / layout, density and building height, that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.
- Signposting to the relevant national requirements such as the Building Regulations and Secured By Design guidance.

Development and Construction

1.24 The codes in the Built Form section will improve the viability of development and construction by:

- Ensuring factors that could have significant implications for numbers of units and layout, such as building forms, building heights and densities, are considered by the applicant early in the design process.
- Providing attractive, characterful and safe developments. These benefits would be attractive to potential occupants, whether buyers or renters.
- Ensuring developments incorporate a range of spaces, building designs and character areas in new development that provide greater choice. These benefits would make the development more attractive to a wider range of buyers and renters.

Lifetime Costs: occupation, maintenance, adaptability and re-use

1.25 The codes in the Built Form section will lower the lifetime costs of new homes by:

- Promoting a range of housing densities and types, including those that are cheaper to maintain and occupy. For examples, flats and terraced homes generally have a smaller external envelope to maintain or to insulate than detached homes.
- Providing a range of house types in the same development, enabling people to live in the same area throughout their life.
- Promoting safe and inclusive environments that provide greater sense of pride and local connection, and reduce the fear of crime and the need to retrofit crime prevention measures or deterrents.

6. Identity

Table 6: Qualitative Viability Assessment of the Identity Codes of the Greenfield (10 or more homes) Design Code

Code ref no.	Topic / Description	Comment
GHL 6.1	Contextual design: the design must demonstrate a positive response to its site and context.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 6.2	Historic spatial character: the design must respond positively to the layout, spaces and characteristics of the historic environment in the site's context or surroundings.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 6.3	Views: the design and layout must incorporate or enhance any important views, vistas or sightlines into or out of the site.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 6.4	Edges and transitions: new design at settlement edges must ensure a suitable transition between the built up area and countryside.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 6.5	Housing design: the design of dwellings must respond positively to the character and scales of existing traditional buildings in the context or surroundings.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 6.6	Historic design: designs must respond positively to traditional local architecture, layouts and character especially conservation areas and the historic cores of settlements.	No impact on viability compared to the existing local plan policies. This is a requirement of all three legacy local plans.
GHL 6.7	Compatible building materials: the colour and textures of development must harmonise	No impact on viability compared to the existing local plan policies.

Code ref no.	Topic / Description	Comment
	with the character of the local townscape and landscape.	This is a requirement of all three legacy local plans

Achieving Planning Permission

1.26 The codes in the Identity section will make the process of achieving planning permission more efficient by:

- Providing certainty as to what is required by the Local Planning Authority, and how, in terms of materials, how to respond to landscape and built context and heritage assets for planning applications. This includes local examples of what is being required by the code.
- Ensuring factors, such as layouts, building scales and forms, that could have significant implications for numbers of units and layout are considered by the applicant early in the design process.
- Ensuring the choice and range of materials are considered early in the design process. The code suggests a suitable range of materials and requires a positive response to the materials palette of the locality.

Development and Construction

1.27 The codes in the Identity section will improve the viability of development and construction by:

- Providing a suitable range or combination of options for building materials rather than exact requirements.
- Identifying aspects of design that can greatly enhance local distinctiveness without inherently costing more to build.
- Providing developments that are rooted in the character and attractiveness of Westmorland and Furness, whether this is the landscape, townscape or both. These benefits would be attractive to potential occupants, whether buyers or renters.
- Ensuring developments respond to their context and place in a traditional or innovative or contemporary way. These benefits would be attractive to potential occupants, whether buyers or renters.
- Supporting local supply chains and sources of building materials and components and reducing transport costs.

Lifetime Costs: occupation, maintenance, adaptability and re-use

1.28 The codes in the Identity section will lower the lifetime costs of new homes by:

- Supporting design that is locally distinctive, rooted in place and will be valued and therefore maintained by occupiers.
- Promoting tried and tested long-lifespan building materials, components, features and details that are durable and suitable for the environment and climate of the district.
- Supporting the local supply of building materials and components for any future alterations or additions to new homes.
- Avoiding the need or desire for occupiers to remodel or otherwise alter the external appearance, boundary features or materials of their homes in order to improve them.