The Deliverability of Site Allocations in Local Development Plans

Scottish Government
Riaghaltas na h-Alba
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Abbreviations used in this report:

GIS = Geographic Information Systems

LDP = Local Development Plan

MIR = Main Issues Report

NPF = National Planning Framework

PAN = Planning Advice Note

SDP = Strategic Development Plan

SEA = Strategic Environmental Assessment

SPP = Scottish Planning Policy

Executive Summary

The Scottish Government instructed Ryden LLP, supported by Brodies LLP, to research the **deliverability of site allocations** in Local Development Plans (LDPs). The research considers the types of proportionate information that will demonstrate a development site's deliverability.
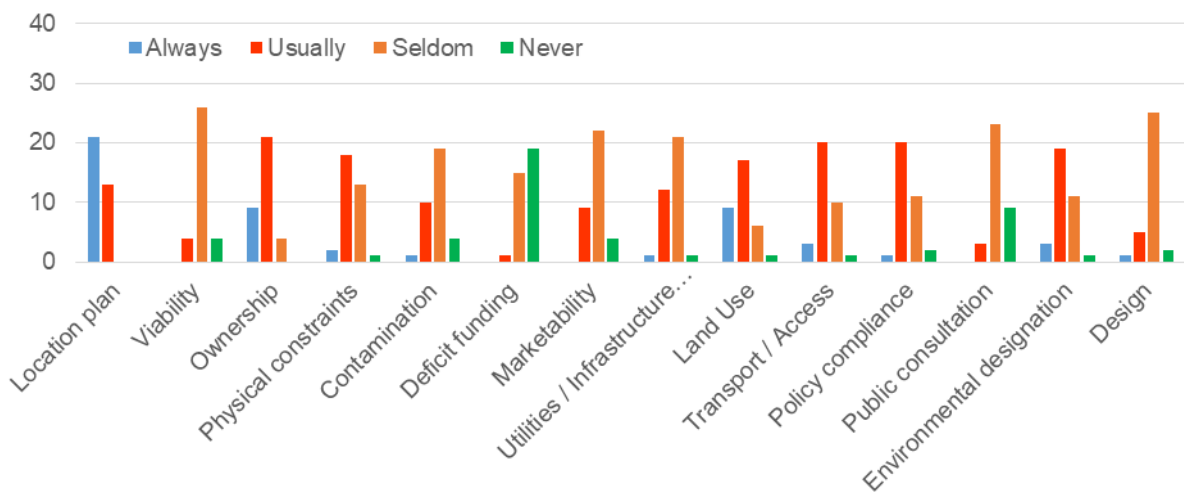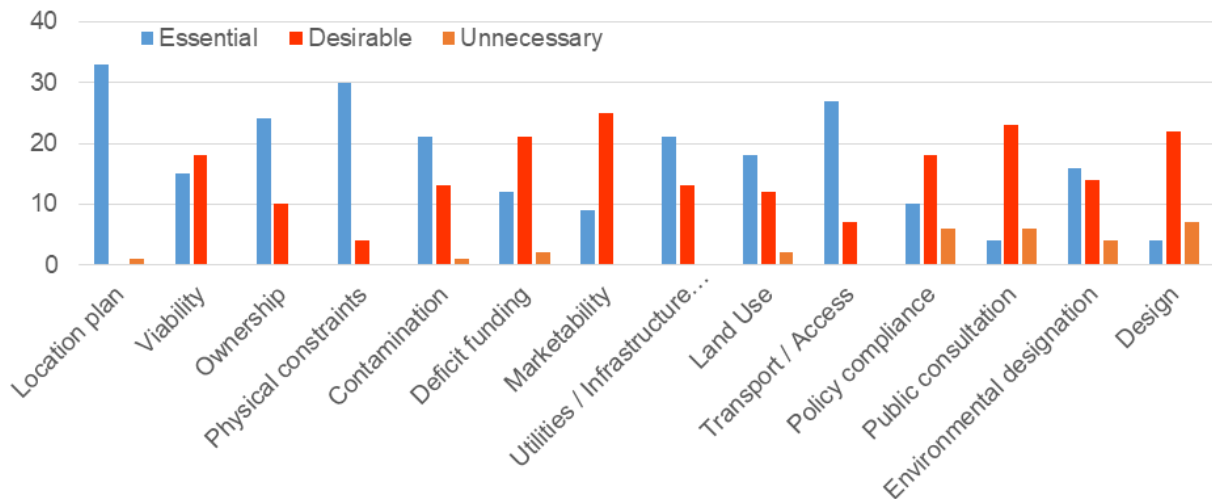
Deliverability has come into greater focus in Scottish **planning policy**. NPF3 and SPP2 advocate "a sharp focus on the delivery of allocated sites". The independent review of the Scottish planning system (May 2016), Empowering Planning to Deliver Great Places, confirmed the vital role which deliverability plays in successful planning. Proposal 5: Making plans that deliver, in the Scottish Government's consultation paper 'People, Places & Planning' (January 2017) advocated a focus on providing greater confidence on the effectiveness of sites and when they can be delivered, including appraisal of information before any site is allocated. Consultation responses agreed that plans would be strengthened by setting out the information required to accompany proposed site allocations. The Scottish Government's Position Statement on 'People, Places & Planning' (June 2017) noted that establishing development viability is essential to securing greater certainty of delivery.

An **online survey** secured a 100% response rate from the 32 Scottish local development planning authorities and 2 National Park planning authorities.

The survey identified that assessing sites information is a qualified and experienced planning role. Site **deliverability is assessed** by Development Planning teams, supported by Development Management, other local authority departments, key agencies and other third party organisations. Site allocation proposals are predominantly requested before preparing the Main Issues Report.

Planning authorities require a **range of information** (see first chart overleaf) to assess deliverability. Mainly this is to inform whether a site is potentially physically deliverable, or faces one or more major constraints. Market information, policy compliance, public consultation and design are typically 'desirable' rather than 'essential'. The current focus is thus upon the initial deliverability of development land through assessment of constraints, and much less so upon the subsequent deliverability of development.

There is a **major and consistent gap** between these site assessment information requirements and the information typically provided by site promoters (see second chart overleaf). Information on physical constraints is 'usually' or 'seldom' provided, and market information 'seldom'. Information categories mirroring PAN 2/2010s' effectiveness criteria for housing are 'usually' or 'seldom' provided by site promoters at the allocation stage. Small Towns and Rural planning authorities receive less applicant information on site constraints than other authorities.

Chart 1 (Essential / Desirable / Unnecessary) by category: Location plan, Viability, Ownership, Physical constraints, Contamination, Deficit funding, Marketability, Utilities / Infrastructure…, Land Use, Transport / Access, Policy compliance, Public consultation, Environmental designation, Design

Chart 2 (Always / Usually / Seldom / Never) by category: Location plan, Viability, Ownership, Physical constraints, Contamination, Deficit funding, Marketability, Utilities / Infrastructure…, Land Use, Transport / Access, Policy compliance, Public consultation, Environmental designation, Design

Some planning authorities use this information provided to populate a **sites assessment matrix**. This can also apply to current LDP allocations. Matrices can identify information gaps and form the basis for further information requests.

Site assessments by planning authorities share similar criteria, but the sieve order and weighting – by **market factors**, **physical capacity/constraints**, or **spatial plan priorities** – are not consistent, and could potentially influence the short-listing and thus the allocation of sites.

Assessing site deliverability for LDPs is evolving towards **greater upfront investigation** across a wider range of site-specific matters with other services, agencies, promoters and communities. The process is however moving at different speeds and in different ways across the country. The clearest differences are in the prominence which development **viability and marketability** are afforded.

The main **constraints** on improving sites assessment information cited by planning authorities are resources and specialist skills. As information front-loading gathers pace, both the volume and specialist nature of information present challenges for planning authorities, applicants (particularly non-developers) and third party agencies.

The large majority (82%) of planning authorities would support **additional guidance** on the information to be provided by site promoters seeking allocations in development plans. However, a significant minority (18%) would prefer that allocation of sites is assessed locally, and many who favour national guidance would also require local flexibility. Thus planning authorities are not necessarily asking for a rigid, mandatory approach to site assessment, but rather the weight and guidance of a standard approach which can retain the potential for local flexibility.

Cross-industry project **consultations** found that assessing deliverability – particularly viability - can be challenging during the early stages of considering sites, although understanding could be significantly improved. The vast majority of these sites are for **housing**. Planning authorities also encourage smaller developers and owners, alternative tenures, landowners and communities to promote and support sites. These targeted approaches are reportedly required in locations where there may be willing landowners and an end market for homes, but no willing developer promoting a site.

The focus on **spatial planning** varies at the site allocation stage. Some areas plan around site options, but weaker market areas can end up with a very limited choice favouring the "best promoted" sites.

The **Main Issues Report** process helps demonstrating site effectiveness and deliverability and allows time for a considered review. **Community engagement** is typically reported around the MIR rather than as part of the initial sites trawl, although some authorities use earlier community-based events to consult on options.

The link with LDP **Action Programmes** is reportedly weak at the sites assessment stage. Infrastructure capacity may be broadly understood, but investment options are not firm commitments and site-specific solutions may be lacking, particularly where there are cumulative impacts, and have later impacts upon viability and deliverability.

Based upon the research, a proportionate **framework for assessing the deliverability of site allocations** is proposed. It seeks to improve confidence in deliverability across different site types, uses, geographies, and from LDP allocation forwards through the planning system. The **staged-and-scaled** sites assessment applies as a site **progresses** through the planning system, and also **proportionately** to different sites.

Staged-and-Scaled Sites Assessment

Current: Calls for Sites ⟶ MiR ⟶ Proposed Plan ⟶ LDP
Future: Calls for Sites & spatial plan ⟶ Gatecheck ⟶ LDP

Stage 1	*Stage 1 information*	*Stages 1 & 2 information*
	Stage 2	
		Stage 3
Local, small, early, rural, passive / patient sites	*Major sites*	*Strategic sites : high impact, complex delivery*

Stage 1 (see full report Annex) is intended to provide sufficient information to conduct a sieve of promoted sites. It can also include sites from other sources such as existing allocations, planning authority allocations, community-led suggestions and unbuilt consents, planned disposals and demolitions, and can be used to quickly screen any gap sites or regeneration areas. The Stage 1 assessment includes site and promoter information, land use proposals, descriptions and proximity to facilities. It indicates a single link to relevant policy and infrastructure information on the LDP website.

Critically, the sites in this first sieve are intended to be subject to a **spatial planning** approach. Spatial planning would work symbiotically with market factors: a willing landowner; a willing developer or note of market potential; awareness of any policy requirements and infrastructure context; and confirmation that in these contexts the site is believed to be viable (or if not then there is a potential deficit funding solution).

Stage 1 can be a holding pool for: local / smaller sites (up to 50 houses or 2 hectares); some rural sites; employment/ commercial/ institutional sites in single ownership; sites held by patient but willing landowners with no developer yet committed; sites where interest has only recently been secured; and emerging public sector sites for regeneration. The aim is to avoid 'pricing out' sites which may have planning merit, but are not yet able or required to meet a higher hurdle for information and deliverability.

Stage 2 is intended for major sites (>50 houses / 2 hectares) promoted for development plan allocation. Information to support deliverability is added to become more specific. Major sites are on balance more likely to have a degree of complexity (and cost) of infrastructure investment, ownership, developer interest, development mix and phasing. A higher bar needs to be set for their deliverability, seeking <u>evidence</u> of deliverability.

The 'major sites' threshold is not prescriptive. Slightly smaller sites with potentially high or complex impacts, particularly cumulative, may also require Stage 2 assessment. Equally, some larger phased or regeneration sites may not yet require Stage 2 assessment. A local approach can be taken.

The main additions to the sites assessments at Stage 2 are: further information on the land use (eg. layout plans), development mix and anticipated phasing; any community engagement; site conditions; and market information to understand deliverability:

- for **housing** uses, **target markets**, formats, tenures and mix, and **evidence of development viability** via costs, values, fees & finance, profit margin, any deficit funding and anticipated land value

- for **employment, institutional and commercial** uses, potential **target markets**, user types and potential activity (eg. workers, customers, students, visitors) on site

Stage 3 sites assessment is proposed for 'strategic allocations'. The largest formal definition in the planning system is 'major'. However, much larger sites – eg. Strategic Development Areas, Community Growth Areas, Major Development Areas - are also allocated. Much of the uncertainty over their deliverability stems from their long term nature and 'step change' infrastructure requirements. Assessing the deliverability of these high cost, high impact allocations thus demands a much higher hurdle. This scaled approach to site assessment also supports a place-based approach to plan-making.

The Stage 3 amplified requirements are in only two areas: the **benefits of the proposals**; and viability assessment via a **development appraisal** incorporating costs, values, fees and finance, profit margin(s), deficit funding and the resulting residual land value. Independent verification of development appraisals may be required. Extreme caution will be required as later phases may not be confirmed in terms of development potential and funding solutions.

The research project Steering Group noted that strategic allocations could encourage a "**co-production**" between the promoter, planning authorities and their local authorities, infrastructure providers, agencies, statutory bodies and communities.

In addition to this staged-and-scaled approach, the research suggested a number of potential enhancements to the information technology **functionality** around site assessment: hyperlinks to policies, maps, agency and infrastructure information; binary (yes/no) field with data for aggregation and analysis; embedding this with planning authority GIS; and direct links to action programmes. Looking to the future, digital software models could help to determine whether allocations are optimum or not.

The **recommended actions** flowing from this research project are:

- The Scottish Government should review the '**staged and scaled**' approach to sites assessment set out here and consider the extent to which that approach **can provide greater confidence in the deliverability of site allocations**.

- The approach requires to be tested in a **pilot study**, which should also consider integration of sites assessment information with the Action / Delivery Programme.

- The staged and scaled sites assessment requires to be appraised against the **emerging reforms** to the planning system.

- Further consideration is required of the **protocols** for requesting and using information from **infrastructure** agencies.

For site promoters, the **resource implications** should be modest up to Stage 2, where there is then front-loading of information requirements in comparison with some authorities' current site assessment requirements. The exception is for viability, for which higher standards are suggested here at all stages of site assessment.

There are two potential ways to **aggregate** the process to achieve efficiencies for planning authorities: software solutions which could be adopted across authorities both to collate and assess sites information and link this to planning system portals and GIS; and sharing expertise and working across regional geographies such as housing market and transport areas could be considered.

Finally, if the Scottish Government decides to support a more standardised, staged and scaled approach to sites assessment for proposed allocations as set out in this report, then any pilot study could inform **national guidance** to be agreed with and rolled-out through Heads of Planning Scotland.

1 Introduction

Introduction

1.1 The Scottish Government instructed Ryden LLP, supported by Brodies LLP, to research the deliverability of site allocations in Local Development Plans (LDPs).

1.2 The research was commissioned by the Building Standards Division (BSD) of the Scottish Government, on behalf of the Planning and Architecture Division (PAD). The research considers the types of information that will demonstrate a development site's deliverability, which can be readily provided by those seeking an allocation in an LDP. This is intended to enable planning authorities to have a better understanding of a site's deliverability when it is proposed for allocation.

1.3 Proportionate information to support deliverable development plan allocations should provide greater confidence for all parties about development intentions and the delivery of that development. The research will inform work being undertaken to develop secondary legislation and guidance to support planning reform in Scotland.

1.4 The term deliverability is deliberate. The planning system does not deliver development. It identifies sites, and grants them a planning status. The modernised planning system also increasingly seeks to coordinate market actors – landowners, developers, funders, infrastructure and service providers – to promote confidence that those identified sites are capable of being delivered.

Market Context

1.5 Development delivery rates are widely reported to be suppressed. Reasons may include the fragmentation of the development and infrastructure sectors, the aftermath of the 2008 Global Financial Crisis, and in the housing sector the monumental shift from public to private provision since the 1980s. These may conspire to make development more complex, slower and more selective.

1.6 Those prevailing conditions are evident in this research. Housing demand and risk aversion skew the focus towards that sector and its infrastructure challenges. Any outcomes from the research must take care to reflect the full range of housing, covering both demand and need, as well employment and commercial opportunities and wider planning goals, rather than being over-engineered to a housing-and-infrastructure delivery model.

1.7 The role that better early information within the planning system might have in releasing development potential may vary by market sector and place. Nonetheless, better information to support site allocations could potentially enhance confidence in deliverability of sites, for planning authorities, communities, landowners and developers.

1.8   This emphasis on deliverability is particularly important as the plan-led system allocates only 'enough' land to accommodate anticipated development – with some flexibility allowed – and thus constrains land supply. The contrasting position would be a *laissez faire* approach, where many sites would be allocated and thus in competition, and the specific deliverability of each site would matter less to overall outcomes.

Report Structure

1.9   The deliverability of site allocations research is presented in the following sections:

- Policy and research review (Section 2)

- Survey of Planning Authorities and Consultations (Section 3)

- A Framework for Assessing The Deliverability of Site Allocations (Section 4)

The report Annex provides a set of templates for site assessments.

2 Policy and Research Review

2.1   Deliverability has come into greater focus in Scottish planning policy in recent years. The first Scottish Government National Planning Framework (NPF), published in 2004, advised that in preparing local housing strategies, development plans and community plans, 'the requirements and mechanisms for delivery are taken fully into account'.

2.2   This thinking evolved further through NPF2 (2009), which, taking account of the reforms introduced by the Planning etc. (Scotland) Act 2006, promoted a vision of a planning system that delivers more homes. This requires a "whole market perspective and coordinated delivery". The vital role of action programmes to "set out a list of actions to deliver the policies and proposals contained in the relevant plan"[1] and support and implement effective delivery became clear in 2008, alongside collective stakeholder working.

2.3   Scottish Planning Policy (2010) recognised that delivery of development is wholly dependent on the timely release of allocated sites to meet needs. However, a number of factors such as: the quality of planning applications and the timings of legal agreement; as well as access to funding, the state of the housing market and construction industry; all have a direct impact on delivery, and fall outwith planning authority control.

2.4   The Affordable Housing & Housing Land Audits Planning Advice Note 2/2010 provides assessment criteria for the effectiveness of housing land; these are:

- Ownership: within the control of a party which can be expected to release it for development

- Physical nature: free from constraints, or where constraints can be overcome and remedial works funded

- Contamination: free from, or has commitments to remediate to a standard for marketable housing

- Deficit funding: has been committed if required

- Marketability: site or relevant parts can be developed during the identified period

- Infrastructure: free from constraints, or can be provided realistically by a developer or another party

- Land use: housing is the sole preferred planning use, or a realistic option

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[1] Town & Country Planning (Development Planning) (Scotland) Regulations 2008

2.5   Circular 6/2013 'Development Planning' developed the thinking around delivery
        with specific references to LDPs. It stated that the selection of preferred LDP
        sites (within a Mains Issues Report (MIR)) should consider "deliverability factors
        such as site viability and housing land effectiveness". The likely timescales and
        sequence of development should also be considered, as well as the role of
        infrastructure. Development viability – ie. the financial costs and returns –
        becomes more prominent in assessing the deliverability of site allocations [2].

2.6   Circular 6/2013 also notes that many authorities a 'call for sites' prior to preparing
        the MIR. This is not a legislative requirement, but can be useful. This research
        project has reviewed LDP call for sites pro formas currently used in the Scottish
        planning system to help develop approaches to sites assessment in Section 4.

2.7   Even a site which passes the planning system's broad infrastructure, viability and
        effectiveness tests might still fall short in terms of landowner willingness,
        developer appetite and financing (including infrastructure). This is particularly
        true for large, complex areas with significant upfront costs and risks.

2.8   In 2014, NPF3 and SPP2 recognised that infrastructure capacity is essential to
        the delivery of new housing (specifically). These advocate that the planning
        system should "have a sharp focus on the delivery of allocated sites embedded
        in action programmes, informed by strong engagement with stakeholders". This
        pinpoints the vital role of collaborative working in delivering the spatial strategies
        and allocated sites within development plans.

2.9   The introduction of action plans, then action programmes (and the now proposed
        delivery programmes), and the transition from local plans to local development
        plans, signals the increasing focus on the deliverability of sites within the Scottish
        planning system.

2.10   Further developing the focus on deliverability, the Scottish Government issued
        draft Planning Delivery Advice on Housing and Infrastructure (March 2016). The
        draft recognised that good practice is happening, but needed to be shared and
        spread. Although the draft was withdrawn in December 2017, a number of its
        references to the delivery of housing and infrastructure and related site
        information are relevant to this research project. These are summarised below.

        2.10.1 Marketability (paragraphs 60 and 61) was no longer one of the
               effectiveness criteria for housing sites in the withdrawn draft guidance.
               This was because marketability is not a fixed constraint, but can change
               over time. Marketability was proposed to become an additional

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[2] Viability in property markets is typically taken to mean that a development appraisal produces a positive
financial result when comparing costs with returns, at today's date and including discounting.
Deliverability is a more holistic consideration of the potential to develop the site, including viability.

consideration for private housing, rather than being one of the normal site effectiveness criteria.

2.10.2 Development plans have a "critical role to play in making the case for new or enhanced infrastructure needed to support development strategies" (paragraph 87). Coordinated infrastructure planning is thus required, particularly for large, phased sites. Action Programmes were explicitly linked to site effectiveness. Infrastructure planning should set out where developers will or will not contribute; if contributions are to be sought a policy statement or specific delivery mechanism is required, including costs (proportionate and prioritised) and known funding (for example City Deals). Developers should be prepared to provide clear information about infrastructure requirements, although more precise cost estimates will come later in the planning process.

2.10.3 The draft guidance stated that the plan should "balance the wider development strategy with **information on deliverable sites**" (Appendix 2, paragraph 2, our bold). It noted that too much information at calls for sites is costly and time-consuming, whereas too little risks taking forward undeliverable sites. Appendix 2 set out the call for (housing) sites process and Annex C provided two-stage call for sites templates. The draft guidance notes that the call for sites could identify not only land, but also the associated infrastructure requirements, and indeed use those requirements as part of guiding site submissions towards preferred locations within the development plan strategy. Transparency and clear and consistent links between sites information, action programmes and housing land audits were recommended.

2.10.4 The draft guidance stated that action programmes "should set out the **pathway** to delivery of developments" (Appendix 3, paragraph 5, our bold). This recognises the distinction between delivery, and encouraging that via deliverability.

2.10.5 At the call for sites stage, the draft guidance[3] advocated that site promoters "submit information on the nature of their proposals and their views on how these will **impact on utilities infrastructure**" (Annex D, our bold). This information would be expected to help understand individual and cumulative site impacts. For transport, the draft guidance sought impacts on transport corridors, distance from existing public transport routes, and impacts (using proportionate analysis) on local and strategic transport network constraints. For education, the anticipated impact on

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[3] As a declaration of research interest, readers should note that Annexes D – F to the withdrawn draft guidance are based upon the unpublished Stage 4 of Ryden's Planning for Infrastructure Research Report (2015) for the Scottish Government.

education infrastructure covering individual and cumulative impacts using school catchments, capacity and pupil generation over time was sought.

2.10.6 Overall, the withdrawn draft housing and infrastructure guidance advocated a proportionate, evidence-based approach to site assessment.

2.11 The independent review of the Scottish planning system (May 2016), Empowering Planning to Deliver Great Places, confirmed the vital role which deliverability plays in successful planning. Housing delivery was identified as one of six key themes, with the panel recommending a clearer definition of effective land and pioneering ideas to increase flexibility and attract investment.

2.12 This recommendation evolved to form part of Proposal 5: Making plans that deliver, in the Scottish Government's consultation paper 'People, Places & Planning' (January 2017), with a focus on providing greater confidence on the effectiveness of sites and when they can be delivered (paragraph 1.44):- "Information on site assessment should be submitted by the site proposer and appraised before any site is allocated in the plan. This would include economic and market appraisal information to provide greater confidence about the effectiveness of sites and when they can be delivered. This could allow for closer monitoring of performance."

2.13 Consultation responses were analysed in detail by Kevin Murray Associates. Respondents observed that the ability of planning to provide confidence in the delivery of sites is only possible up to a point; and that housing issues cannot be solved by planning alone. Regarding[4] whether development plans could be strengthened by setting out the information required to accompany proposed allocations, 89% of respondents agreed. However the development industry – which would typically be asked to provide that information – noted a concern that information in the early stages of a proposal will likely change as the proposal becomes more detailed. Subsequent questions on whether specific information should be provided to support allocations also attracted positive responses:

- site feasibility 91%;

- increased consultation requirements for non-allocated sites 79%;

- working to ensure that key agency support for allocations extends to not objecting to the principle of planning applications 73%;

- stronger delivery programmes could drive delivery of development 84%

This final point suggests a faith in the planning system to not only promote deliverability, but to actually drive the delivery of development. The question of what respondents understand by "stronger" delivery programmes – ie. better information, analysis and programming; or, greater planning control over development activity, is unanswered. Respondents do however believe that

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[4] Proposal 5: Making Plans that Deliver, question 7(a).

"planning can only facilitate delivery up to a point, particularly where external market factors are involved."

2.14　The issue of site viability arises within the consultation responses. Developers offer that "viability work" - presumably a development appraisal - will often precede a planning application, but some details may be unknown prior to grant of consent. The report notes that viability work would most likely only be undertaken by an active developer rather than other types of landowner. Respondents noted that information on site "feasibility" (undefined) should be proportionate and allow for changing circumstances.

2.15　The Scottish Government issued its Position Statement on 'People, Places & Planning' in June 2017. The Statement recognised the continued support for a plan-led system, implemented through a strong delivery programme. It noted that **establishing development viability** is essential to securing greater certainty in the delivery of development plans and sites allocated for housing.

2.16　The Statement was expanded in a Technical Paper (September, 2017) on how key changes could work in practice. This envisages early verification of housing land requirements at the newly-proposed development plan 'gate check' stage. Planning system changes include moving from 5 to 10 year LDP cycles, giving SPP statutory weight within LDPs, removing the SDP, replacing the MIR with a Draft Plan, creating Local Place Plans and moving from an action programme to a delivery programme. Overall, LDPs would be more place-based, and less about policy wording. The aim is to support transition to the new system in advance of NPF4 in 2020.

2.17　Turning to the wider UK, NPPF[5] for England seeks to ensure site viability and deliverability (paragraph 173). It states that development costs and burdens should still "provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."

2.18　English guidance on Local Plans[6] has no statutory requirement for a call for sites, although most planning authorities have an options stage. The guidance states "Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development." Planning to fund infrastructure and bring land on stream for a 5-year period is required but, echoing NPPF, Local Plan infrastructure requirements should not prejudice development viability.

2.19　A recent major study in Wales[7] assesses whether housing sites are being delivered in accordance with programmed outputs and policy requirements, and the viability information which was submitted at each stage of the planning

[5] National Planning Policy Framework, Department for Communities and Local Government, March 2012

[6] https://www.gov.uk/guidance/local-plans--2

[7] Longitudinal Viability Study of the Planning Process, Welsh Government, February 2017

process. At the early stages of plan preparation, site information concerns 'deliverability' in its broadest sense, such as land ownership, presence of infrastructure or environmental constraints. Viability information did not typically form part of call for sites assessments. Some authorities did undertake early viability work, but problems with delivery persisted, due to landowner in(action) and sites rolled over without development, public assets not yet disposed of, and complex sites requiring regeneration solutions.

2.20 The Welsh Government research recommends a more prescriptive approach to the level of detail required for a site to pass through the allocation process. With its focus on viability, it recommends that a residual land value should be provided by site promoters at the call for sites stages; sites with a negative value should not progress without further evidence. For strategic sites, an outline development appraisal is recommended, allowing authorities to not only understand viability but also test policy impacts, for example affordable housing requirements. The research report suggests this would provide greater certainty over the viability of allocated sites, reduce abortive work, create better evidence at Plan examination with the loss of fewer sites, and potentially result in less negotiation at development management stage.

3 Survey and Consultations

Introduction

3.1 The research programme into the deliverability of site allocations included a survey of Scottish local planning authorities, consultations and working sessions. The purpose of the survey was to:

- identify the information provided by promoters of sites in support of allocations in development plans;

- explore to what extent that information does or does not provide confidence in deliverability; and,

- consider how that confidence could be improved.

3.2 Following analysis of the online survey, planning authorities were selected for one-to-one discussions and exploration of their experiences of requesting, receiving and assessing sites information to support deliverability. The planning authorities were: Aberdeenshire Council; Clydeplan (for a strategic perspective); North Ayrshire Council; and Perth & Kinross Council. A consultation was also undertaken with the British Geological Survey in relation to an LDP data project which the organisation is currently undertaking for the Scottish Government.

3.3 Two further consultation sessions were held: a panel review of the early research in January 2018; and a Steering Group in February 2018. The sessions were attended by representatives of: Architecture and Design Scotland; Homes for Scotland; the Royal Institution of Chartered Surveyors; the Royal Town Planning Institute; Scottish Enterprise; Scottish Property Federation; and Scottish Water.
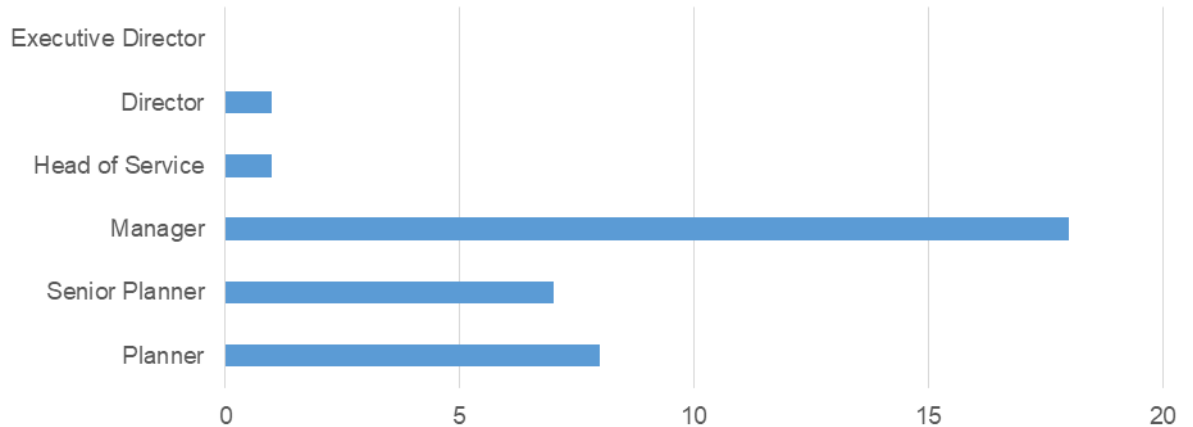
Planning Authority Survey

3.4 The online survey was open to the 32 Scottish local development planning authorities and 2 National Park planning authorities between December 2017 and January 2018. The survey secured a 100% response rate [8].

3.5 The analysis below provides the combined responses to each question. Where free text or supplementary comment was requested, a summary review of those written responses is also provided. As an indication of the depth of interest in this topic among planning authorities, the exercise attracted not only the 100% response rate noted above, but also more than 8,000 words of written comment.

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[8] 36 responses were received; 2 were duplicates which the consultants blended into single responses

3.6   **Question 1** asked respondents to indicate which planning authority they were responding on behalf of. This allowed the consultants to manage the response rate including dealing with duplicate responses and offline submissions, and conduct later sub-analysis by local authority type reported at paragraphs 3.17 to 3.23.

3.7   **Question 2. Please select your job title.**

A small majority of respondents are at managerial level in their planning authority. The balance are planners or senior planners. Very few (2) are at executive level. This suggests that receiving and assessing sites information is a qualified and experienced, 'hands on' process rather than an executive function.

3.8   **Question 3. Who leads on, and who is involved in, the assessment of site deliverability?**
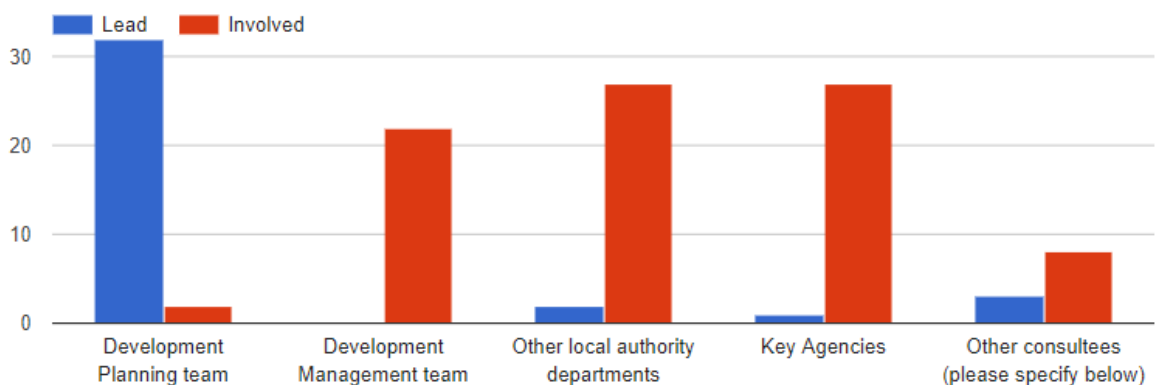

As would be expected, site deliverability is assessed by Development Planning teams. The large majority of Development Planning teams also involve other local authority departments and key agencies in their sites assessments. Two-thirds of respondents also involve their Development Management teams in assessing the deliverability of sites. Other consultees were mentioned by a minority of respondents, but the range is extensive, including Transport Scotland, Historic Environment Scotland, landowners, developers, Homes for Scotland, housing associations, Forestry Commission, regional transport partnership, Network Rail, community planning partners and the Scottish Wildlife Trust.

3.9 **Question 4: At which stage in the Local Development Plan process do you request site allocation submissions?**
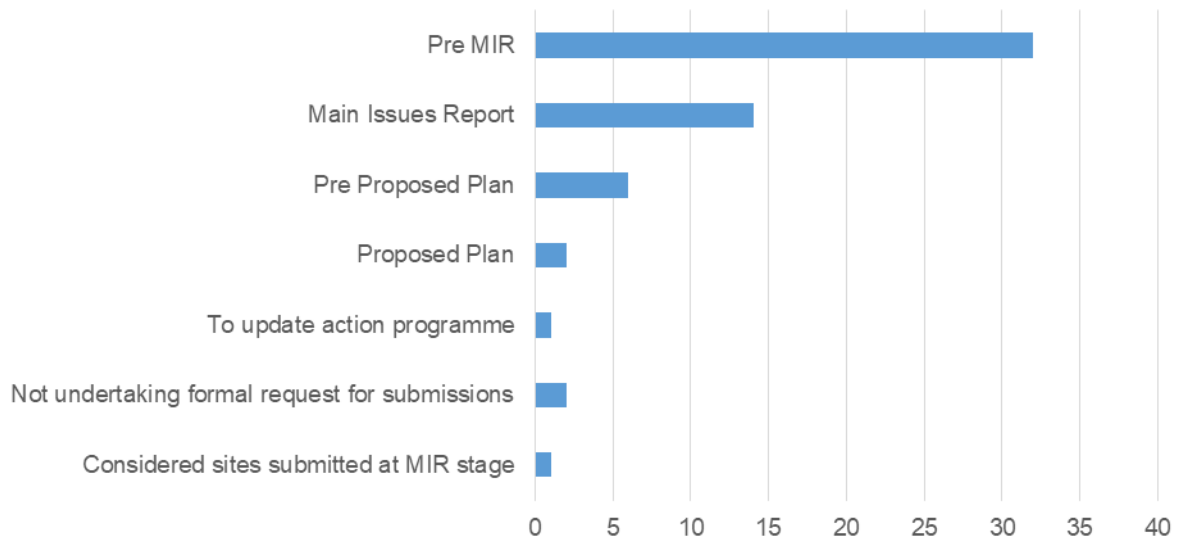
Site allocation proposals are predominantly requested before preparing the Main Issues Report within the current plan process. One authority has not called, for sites but where information is required on a particular location the agent/owner is then contacted. Another One authority takes a "planning approach" to current and potential sites, and may issue a targeted call for sites if required. Some authorities consider sites proposed during the MIR consultation. One authority requests sites information to help update its action programme.

3.10 **Question 5: How important is supporting information in understanding a site's deliverability?**
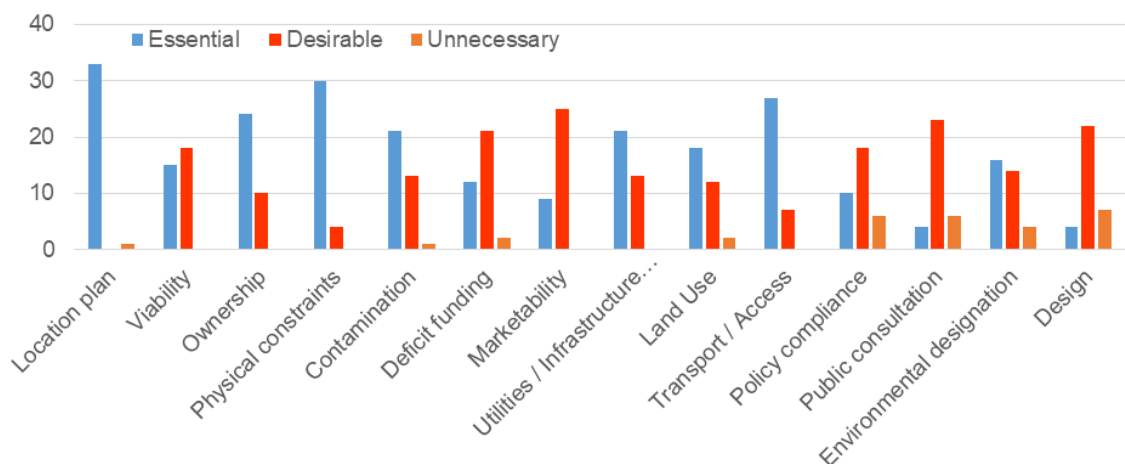
The question seeks to understand the link between site information and understanding of deliverability. Planning authorities require a notable range of information. Location is clearly essential. Physical constraints and transport/ access information is mainly essential, or at least desirable, as is ownership. A majority report that contamination, infrastructure / utilities, land use and environmental designation information is essential; and the balance say that

such information is desirable. Together these will inform whether a **site** is potentially **physically** deliverable, or faces one or more major constraints.

The responses to **market** factors governing whether **development** might be deliverable on site are more nuanced. Authorities would, in the round, like to receive information on viability, marketability and deficit funding, but only a minority think this information is essential, and the balance that it is desirable.

Policy compliance, public consultation and design attracted a range of different responses from planning authorities, around a central view that information on these is 'desirable' within site proposals.

As an inference from these responses, it could be stated that the current focus of development planning is upon the initial deliverability of development land through assessment of constraints, and much less so upon the subsequent deliverability of development. Physical constraints are a clear precursor in making a site developable. They may also be subject to less future variation - and alternative interpretation - than market factors and viability; meaning that early physical site information is more useful, may be more easily agreed upon, and may decay less over time.

Additional useful information noted by authorities includes planning history, any options held, any legal restrictions, land tenure, greenfield or brownfield / vacant & derelict, developer and anticipated programme, funding source, socio-economic benefits, landscape impact and trees/ hedges on site, compatibility with neighbouring uses, broadband coverage, core paths/ routes, green belt / network, and accessibility to services/ facilities including via public transport[9].

3.11 **Question 6. What supporting information do applicants provide in site submissions?**

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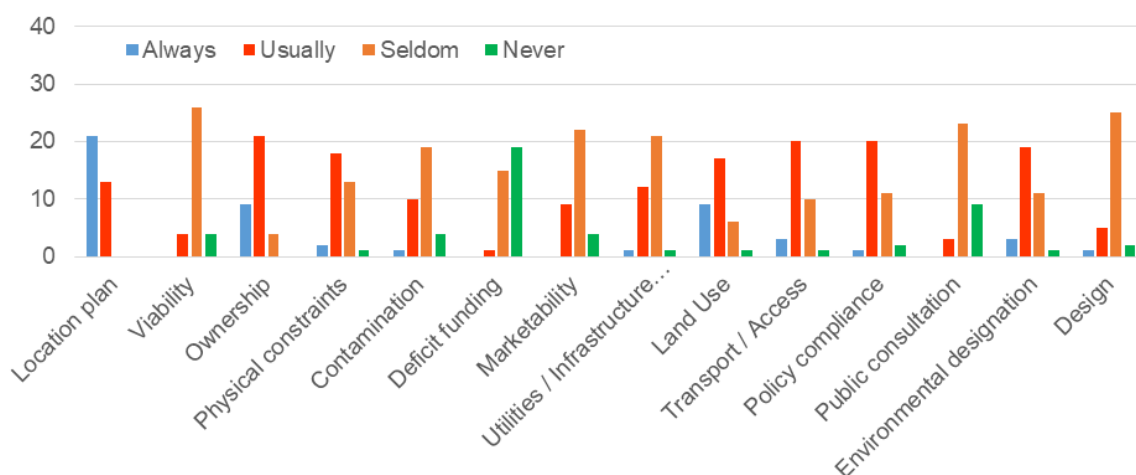
[9] Only one authority specifically mentioned that schools capacity should be assessed by site promoters. Schools are implied under the infrastructure heading in the survey, but the potential for lack of schools capacity to impede housing development might have been expected to feature more specifically and more strongly.

This question provides a direct comparison with question 5. Given the information that planning authorities would like to receive to assess site deliverability, what do they actually receive from site promoters ?

Remarkably, only two-thirds always receive a location plan. About one-third always receive land use and ownership information. Regarding the physical constraints highlighted as important to assessing site deliverability at Question 5, the balance of responses for all information types sits between 'usually' and 'seldom'. For the market factors (viability, marketability and deficit funding), responses are clustered around 'seldom'. Planning authorities note that the information submitted by promoters varies greatly by site and submission.

Overall there is a major and consistent gap between the information attributed to categories of sites information by planning authorities and the information that is typically provided by site promoters.

Whether this gap adversely impacts upon deliverability by creating persistent information gaps is less clear; site information may accumulate during the subsequent planning and design activities up until the determination of a planning application. Understanding deliverability may be a process rather than a stage.

A further direct comparison can be made here, with PAN 2/2010s' effectiveness criteria for housing sites (paragraph 2.4). The third (ownership) to ninth (land use) information categories in Questions 5 and 6 were set to mirror those effectiveness criteria. The typical response above is that site promoters usually or seldom provide this information. **This suggests a major information gap against policy requirements when assessing promoted housing sites, meaning that the effectiveness of those sites must be assessed elsewhere in the planning process.**

3.12 **Question 7. How is the deliverability assessment actually undertaken, for example do you use an assessment matrix? Please provide a brief description.**

This question attracted a range of responses, some very detailed. It is possible that there is an element of self-selection here, with those authorities applying the most rigour to assessing site deliverability also providing the most detailed responses to the survey. Among the more brief comments, one respondent for example noted that they are currently developing a sites assessment methodology for the first time. Another responded that they do not have a formal approach to sites assessment but use internal discussion to assess sites.

Those authorities responding in some detail use the information provided by site promoters to populate a comprehensive sites assessment matrix, including scoring. This can also apply to current LDP allocations, not just new proposals. The method and results of the sites assessment are made public by some authorities. Site evaluation reports are provided by some. One notes the importance of a commentary on deliverability undertaken with other local authority teams, such as housing. Another notes that site visits are conducted. It was noted that sites assessment matrices can identify information gaps and form

the basis for further information requests and subsequent dialogue with site promoters.

One authority noted that they do not challenge site promoters' statements regarding deliverability, as this would require detailed knowledge, but that they do set out comprehensively the issues to be addressed. Another requests evidence of marketing, interest and values (while acknowledging that, pre-allocation, this may be limited); that respondent would like design information and development appraisals to accompany site submissions. A further respondent uses the sites assessment as an opportunity for dialogue with site promoters about, for example, their past and anticipated future development rates.

A planning authority described a staged process, where sites were shortlisted then reviewed by 'key stakeholders' to help select preferred sites for public consultation through the MIR process. Non-preferred sites were presented as alternatives and also consulted upon and subject to Strategic Environmental Assessment. Another describes a process of internal (local authority) and external consultations to come to a view on sites.

Information on required infrastructure enhancements are a major focus. One respondent focuses on "physical feasibility, not financial viability", reflecting the distinction made here at paragraph 3.10. The respondent also notes that site promoters "have rarely indicated that a potential site and its necessary infrastructure are undeliverable".

The use of Strategic Environmental Assessment data in site assessments is mentioned by a small number of respondents who use that process and their sites assessment in parallel to avoid duplicate work.

One respondent prepares individual site assessments covering physical, environmental and infrastructure topics, rather than a comparative matrix. Sites are drawn from the Housing Land Audit process, public sector surplus sites, those nominated by site promoters at pre-MIR call for sites and during consultation, other sites noted and sites from the previous LDP. Assessments include site history (from internal records and consultations and key agencies), and a consideration of how each site fits within the development plan strategy. This approach combines the spatial plan aims with all potential site options.

Similarly, another respondent reports that groups of sites are assessed against sustainability and location as the principal considerations, and then also deliverability on a qualitative basis guided by PAN2/2010 (for housing sites). Another combined approach uses three broad categories - environmental factors (using Strategic Environmental Assessment – SEA – data), infrastructure availability, and viability/marketability – to assess candidate sites.

Some approaches appear to be more market-led. One authority first sieves sites for effectiveness and deliverability, requiring them to pass that stage before a more detailed assessment is undertaken. Another authority overlays (for housing

sites) a "marketability map" provided by Homes for Scotland onto SEA and Key Agency data. One authority conducts detailed assessments and consultations, where having an active developer on board is critical. One undertakes an assessment of site deliverability, while another specifically does not assess deliverability at the call for sites stage. Another relies upon information in the annual Housing Land Audit (for housing sites). Another undertakes a consultation exercise to understand viability. Taking a more detailed approach, one authority specifically ensures that site promoters have considered viability - including policy requirements - in order to save time and costs at the development management stage.

The approaches to site assessment clearly share some common ground in terms of the range of criteria, but the sieve order and weighting – by **market factors**, **physical capacity/constraints**, or **spatial plan priorities** – are not consistent, and could potentially influence the short-listing and thus the allocation of sites.

Only one respondent specifically mentions assessment of deliverability of employment rather than housing sites[10]. All other land use-specific comments in the survey referred to housing.

A few respondents mentioned the software they use to assemble sites information. Microsoft Access, spreadsheets and internal GIS systems were specifically mentioned.

Some respondents described specific working practices. These include an LDP Project Board, internal working groups, and a panel of professional disciplines which guide the criteria and site scoring. One mentioned hosting Place Standard workshops with communities. The importance of including commentary as well as simply scoring was noted.

In summary, these responses to Question 7 indicate the evolutionary nature of assessments of site deliverability in the preparation of Scotland's LDPs. The general trend is towards greater upfront investigation across a wider range of site-specific matters, a more interlocking approach with other services, agencies and workstreams, and better transparency and consultation with site promoters and communities. The process is however clearly moving at different speeds and in different ways across the country.

The clearest differences are in the prominence which development viability and marketability are afforded in the process. Most authorities assess whether sites are physically deliverable, while some also assess – or indeed prioritise – whether future development might be deliverable. The two are of

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[10] That might be prompted by the consultant team as it relates to an assessment undertaken for the authority by Ryden.

course linked, as viable development can permit prior physical site investment and funding of policy requirements.

3.13 **Question 8. What are the current constraints to improving information for the assessment of sites? (multiple answers can be ticked)**

The major constraints on improving site assessment information are planning authority resources and specialist skills; more than two-thirds of respondents cite each of these. As the process of information front-loading to improve confidence in deliverability gathers pace, both the volume and specialist nature of information and assessments received present challenges. The majority response indicates that information overload is not simply a prime market phenomenon, but is a common feature of development planning.
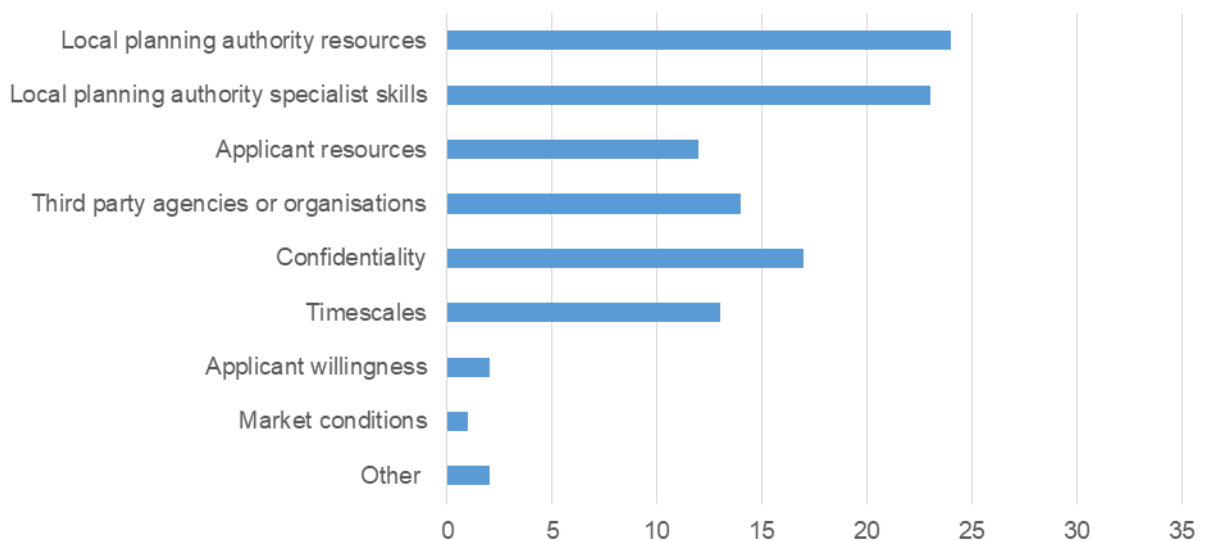
The resources of applicants to provide information is cited as a constraint by a large minority of authorities. Not all site promoters are major developers with extensive resources and skills and professional advisors. Site promoters may include communities, individuals, small developers, long term landowners, public agencies, economic development organisations, social housing landlords and in areas of low demand or for non-housing sites, the planning authority themselves.

Third party agency resources and timescales are noted as constraints by a large minority of respondents. Just over half of respondents note that confidentiality of information is a constraint.

This question about constraints attracted significant additional comments from authorities.

Information submitted varies from site to site; some submissions are very lengthy yet still don't provide the information required. Information provided by site promoters is often "lacking, vague or of poor quality". Marketability questions typically yield assertions rather than evidence. Site servicing questions can attract similar statements rather than capacity and costs. These may signal lack of resources, unwillingness to commit resources at an early and uncertain stage, or perhaps a reluctance to highlight less viable sites. Site promoters are believed by authorities to feel that a planning application merits substantial resources, but

not an LDP allocation. Some site promoters are thought by authorities to also feel that the information sought is commercially confidential or sensitive.

Local authority resources vary greatly and some report receiving disproportionately high volumes of site submissions. One team received more than 600 site submissions, constraining the extent of expertise which can be applied to each within a short defined timescale. Another with only four planners in a large area received more than 80 site submissions. Yet another received more than 200 site bids in a context of reducing staff resources.

Assembling, reviewing and assessing information then engaging in meetings and consultations is reportedly time consuming. Internal consultees for matters such as air quality, noise, heat mapping, flood risk, education and roads can also require to consider large numbers of promoted sites.

Rural authorities report resources and skills challenges not only in their authorities, but also in their local property development and professional services sectors.

Specific skills reportedly required are mainly around market analysis and development appraisal to inform viability. However, one authority notes that challenging viability can destroy the trust built up with site promoters, and genuinely unviable sites are likely to be identified very early in the process. Another notes that major developers have declared a location 'unviable', only for a local developer with a different business model to successfully build in the same area. Some respondents would like to see site promoters' development appraisals, while recognising that these may require specialist support, independent verification and will change over time.

One respondent notes that standard questions are insufficient for larger sites; impacts on infrastructure and site appraisals including independent input and ongoing dialogue are required, although this will be time-consuming for site promoters and include technical studies (for example transport, ground conditions, flood risks), without the certainty of securing a site allocation.

Key Agencies are reported to be generally helpful around the call for sites process, although occasionally their responses can be slow or not forthcoming. Repetition of facts by Agencies are less helpful to planning authorities than their views on whether constraints will affect a site's potential to be developed; and a definitive statement of the information they would require to support rather than object to an allocation. Key Agencies and other consultees should, in the views of planning authorities, be made aware of the need to demonstrate the deliverability of development plan sites.

One authority noted an assumption that site promoter information "does not lift the duty on the authority to consider all relevant options on a consistent basis". This implies a potentially significant requirement for authorities to bring all submitted site information to a consistent standard and if necessary complement that with further specialist input. That would place a greater burden on planning authorities and other departments and agencies, particularly in market areas and sectors where major developers are less active. Such specialist input is often

needed by planning authorities around infrastructure requirements, including estimation of cumulative needs.

Some respondents report a "do minimum" approach by site promoters. One reports that repeated requests to site promoters to demonstrate deliverability with information such as potential layout or site constraints yielded a 10% response, none of which included financial viability. Those site promoters with relatively better proposals are believed by respondents to be aware of their competitive advantage, and thus do not feel compelled to further demonstrate deliverability.

3.14 **Question 9. Would you support additional guidance on the information to be provided by applicants?**

Legend:
- Yes, standard guidance
- No, prefer to be decided locally

17.6%
82.4%
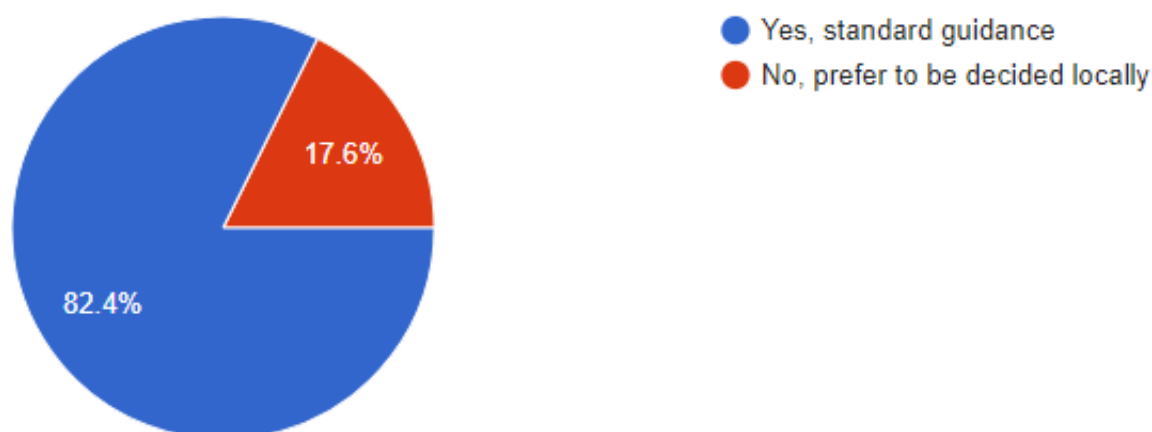
The large majority of respondents would support additional guidance on the information to be provided by site promoters seeking allocations in development plans.

Respondents believe that local guidance and information requests are too easily ignored. Site promoters are thought likely to comply more with national guidance.

However, a significant minority of respondents do not support additional guidance and believe that allocation of sites should be assessed locally. Furthermore, many who favour national guidance would also require scope to adjust for local needs, and where necessary for that to take precedence. Examples of local variability included rural markets and former mining areas which create specific site conditions.

Thus the survey respondents are not necessarily asking for a rigid, mandatory approach to site assessment, but rather the weight and guidance of a standard approach which can retain the potential for local flexibility.

In terms of a minimum information standard, it was noted that this is something that site promoters should "have anyway, if they are serious about developing a site". On the other hand a fully standardised approach may deter smaller but committed developers from an onerous process.

The structure of planning reform was noted by one respondent; they were of the view that if local supplementary guidance is removed from LDPs then the need for national guidance will be greater.

A minority of respondents do not carry out a call for sites. One in a high value market area notes that sites emerge continually. The authority assesses all available land within its strategic development areas and identifies options; information from site promoters is noted but not decisive. Site promotion at MIR and Proposed Plan stage provides more detailed information which can be of use, but mainly "presents a site in the best possible light".

Where respondents elaborated on the details of any future national guidance, their focus was upon site viability. One sought Scottish Government resources and District Valuers' independent input to appraisals. Developers, Key Agencies and other infrastructure providers would in their view be required to support the process. Two respondents specified the required inputs – mix, prices, costs – to allow benchmarking of development proposals and their profit margins. One respondent indicated that site hope value and constraints/abnormal costs should be provided. The willingness of site promoters to participate in cumulative and if necessary cross boundary infrastructure assessments of their sites was questioned by respondents.

One respondent noted that the main factor in securing information to promote confidence in deliverability will continue to be the site promoter's judgement of costs versus the likelihood of securing an allocation, even if more guidance was provided. Thus site promoters in more buoyant market areas may be prepared to commit more resources to assembling site information than those in weaker market areas.

3.15 **Question 10. Are you aware of more successful approaches for site allocations used elsewhere? If so where? (e.g. another Planning Authority, Statutory Authority etc)**

This question attracted a uniform response, that planning authorities are not aware of a more successful approach to site allocations. It appears to be a "universal problem". The level of detail provided and the potential for information to be provisional at development plan stage is a persistent challenge. Some authorities have however enhanced their approaches to site assessment and participate in cross-authority work to promote best practice.

3.16 **Question 11. Are you currently proposing to change the information required to support site allocations? If so please provide details**

A minority of respondents do not propose to change the information required to support site allocations. Some are also bedding-in what are relatively recent site assessment approaches developed for their LDPs. Others are waiting to see whether further guidance is provided in the context of planning reform (particularly the proposed 'gatecheck') and the withdrawn 2016 guidance note. One notes lack of development industry support as a barrier to change, particularly around realistic marketability, programming and viability.

Some intend to supplement site promoters' information with further assessments, for example of sustainability (BREEAM Communities was mentioned). Others are enhancing the range of information assessed and clarifying what is required of site bids. Some report seeking further information at MIR stage, for example using the emerging Action Programme as the basis to interrogate timescales and delivery plans.

Notably, one authority which does not propose to call for sites is undertaking additional upfront work into the deliverability of currently allocated sites. They report that this is yielding useful information around market conditions, business models, landowner issues and other constraints such as infrastructure and costs as well as the opportunity to challenge landowners/developers about these. Actions may then be taken by the authority to help inform targeting of resources to support the delivery of those current sites and inform the next LDP, which may then include a targeted call for sites around settlement areas. Site promoters can however approach the authority to discuss their sites at any time.

Area Sub-Analysis

3.17 The online survey reported above grouped together all planning authorities. This sub-analysis seeks to establish whether there are any significant differences by type of area. Many potential variations are possible, but to test the potential for variation here a straightforward application of the Scottish Government Urban:Rural classification[11] is used to code areas into:

- Large urban (7 authorities)

- Other urban (12 authorities)

- Small towns and rural (15 authorities)

The coding allocates each planning authority to an area based upon the largest proportion of its Urban/Rural classification. The analysis was inspected to ensure that it yielded a broadly sensible allocation for each area.

3.18 In all types of local authority area, the development planning team leads the assessment of site deliverability (survey Question 3). Large Urban areas have consistent supporting roles for development management, local authority departments and key agencies. Other Urban and Small Towns/ Rural areas afford at least as great a role to these supporting teams, and sometimes greater.

3.19 There is a clear distinction by areas around when site allocation submissions are requested (Question 4). Large and Other Urban areas take submissions pre-MIR and typically also at the MIR stage. Very few Small Town and Rural authorities

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[11] http://www.gov.scot/Topics/Statistics/About/Methodology/UrbanRuralClassification

take a second round of information at the MIR stage. The reasons are not stated, but perhaps deliverability may be less complex (or perhaps more binary – ie. it will or won't happen) in locations away from major urban areas.

3.20   Question 5 sought responses on the importance of 14 types of information to understand a site's deliverability. The findings are:

- There were no major differences by area type in the importance of a location plan and information viability, ownership, physical constraints, land use, transport and access, policy compliance, public consultation, environmental, design or utilities.

- The possibility of site contamination is more important to larger urban authorities; probably reflecting legacy land uses in former industrial locations.

- Deficit funding and marketability are more important to Small Towns and Rural areas, less to Other Urban, and least so to Large Urban; probably reflecting a reverse hierarchy of (presumed) viability.

3.21   Question 6 asked what supporting information is provided in site submissions. The full survey already demonstrates a substantial gap between what information planning authorities would find useful when allocating sites, and what is provided by promoters. By area type:

- There is no notable distinction by area in promoters' provision of location plans or information on viability, ownership, contamination, deficit funding or marketability.

- Small Towns and Rural planning authorities receive less applicant information on physical constraints, utilities, land use, transport & access, public consultation, environmental constraints and policy compliance than Large or Other Urban authorities.

3.22   The constraints on improving site assessment information (Question 7) are broadly similar by area, although more Small Town and Rural authorities report that planning authority resources and skills are the main constraint.

3.23   The desire for local decision-making is stronger among Small Town and Rural planning authorities; 73% would support additional guidance (Question 8) compared with 92% of Other Urban and 85% of Large Urban authorities.

Consultations

3.24   The survey reported above was largely a research exercise into how sites information is gathered and analysed, supplemented by some respondent views on the effectiveness of that process and how it might be improved.

3.25   The research project consultations built upon the survey by examining topics in more detail, taking into account the wide range of perspectives among those

consulted via face-to-face meetings, an Expert Panel and a project Steering Group (consultees were listed in paragraphs 3.2 and 3.3).

3.26   Consultees report that assessing deliverability can be challenging during the early stages of considering sites, although understanding could be significantly improved. Consultees pointed to SPP and the provision of an effective land supply; noting that the planning system can deliver a consenting process, but has only a "light touch" upon the delivery of development.

3.27   The site information initially received from promoters typically requires to be supplemented. Repeat engagement between site promoters and planning authorities tends to improve information quality during the development planning process; it is noted here, though, that this iterative approach runs counter to an 'upfront' approach to site assessment and selection.

3.28   The volume of sites promoted in response to a call for can reportedly be very high, from up to 100 through to 500 or more sites in very active market areas. Consultation on those sites is required with internal local authority departments and external agencies, each of which has their own resource priorities and pressures. Researching and understanding site deliverability is reportedly demanding and can require expert inputs.

3.29   Given these potentially large numbers of site bids and resource pressures on all parties[12], it was suggested by some consultees that the first trawl is not the appropriate point to seek large volumes of site information, as it is simply "the start of a process". In one area for example, the first site sieve removes proposals with no delivery potential nor planning merit, then seeks further information on sites which are assessed as having some potential. In another areas though, a more extensive standard pro forma is completed to allow all sites to be initially cross-compared in a matrix, then short-listed.

3.30   Consultees believe that slower development in recent years may reduce the numbers of new sites being promoted in future. Responding to market activity, some planning authorities are understood to be using their next LDPs to find more deliverable sites than their current batch of under-performing allocations.

3.31   Early identification of large future sites, particularly those with a major infrastructure requirement, was discussed positively. This may however be challenging in the context of seeking early evidence of effectiveness and deliverability; it was suggested that providing information for and managing larger site proposals incurs six-figure costs for promoters. One consultee suggested that very large sites could be part-delivered during an LDP period and part

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[12] RTPI reports that local planning authority staffing has fallen by 23% since the Global Financial Crisis and now accounts for only 0.44% of local authority budgets.

strategic reserve, to be drawn down as and when development performance is demonstrated.

3.32   Views on providing information on site viability varied. It is thought that a balance is required between simply making / seeking assertions that sites are viable (as some calls for sites currently), against incurring the high costs noted above when there may be only limited confidence in the site being awarded a development plan allocation. It was noted that viability can change, not only in response to markets but also through interventions such as Help to Buy. Consultees report that development viability can be challenged by all parties at MIR and Plan examination, and interrogated by development management teams at the planning application stage, using appropriate information and expertise. Some consultees noted that a site's viability is a "snapshot in time" and may change.

3.33   The vast majority of sites promoted are for housing; this can be in excess of 95% of bids received in response to a call for sites. To balance this process, which is led by major sites and housebuilders, planning authorities also encourage smaller developers, landowners and communities to promote and support site allocations. Consultees suggested that site assessments could take account of who is promoting the allocation, in order not to present "barriers to entry" which may lead to potentially attractive locations and sites being dismissed.

3.34   In respect of affordable housing, the relevant developers are thought likely to promote only sites which can be delivered. In weaker market areas, there is reportedly a structural change from private sector delivery of housing and other uses pre-2008, to a dependency upon the affordable housing providers and the Scottish Government's current active programme. Local builders are reportedly acting as contractors for the delivery of that affordable housing in some areas, rather than taking private development market risk.

3.35   The question of what is 'effective demand' was discussed. As noted in the online survey, some planning authorities have experience of sites and locations being rejected as unviable by major developers then successfully developed by local builders. 'Small sites' policies can help to address this by supporting local markets and potentially circumventing the stranded / stalled site phenomenon, where major infrastructure is delayed or is not provided. Self-build and custom-build housing site options are also being promoted, although these are not always welcomed by the development community.

3.36   In rural areas, where sites are slower to develop and may have no developer promoting them, a more relaxed approach to site allocation is reported to be required. Some areas do attract site promotion by individuals, but those parties may not have the experience to move through the development plan process – the system was described as "impenetrable" to anyone other than experts, and that communities for example "couldn't answer" typical call for sites questions.

3.37   Development industry "reticence" to promote locations which may have market potential, but have no recent track record was promoted. One response noted was to identify broad land uses across large urban areas, thus directing growth

and giving comfort to smaller potential sites without these requiring to be individually promoted through the call for sites.

3.38   These targeted approaches to site allocation were described as being required in locations where there may be willing landowners and an end market for homes, but currently no willing developer[13] promoting a site.

3.39   The question of whether better early information might have helped stranded or stalled sites address delivery challenges was discussed. Those tend to be the sites with major impacts, for examples roads and schools investments, which have typically failed to overcome their funding challenges. Working through the deliverability of those existing allocations also forms part of the development planning process for all parties.

3.40   The role of spatial planning was discussed. This was in the context of whether planning authorities are thought to be: searching for the best sites within preferred areas, say from the Strategic Development Plan direction, settlement patterns and infrastructure capacity; or are 'takers' of sites promoted by the market. Responses were mixed. Some areas are believed to apply "good planning" to identify or plan spatially around site options, but weaker market areas can end up with a very limited choice, where if deliverability is prioritised then only the "best promoted" sites with major developers attached are able to progress.

3.41   In this context of potentially weak spatial planning in some areas, the project Steering Group supported the view that development planning should be mainly proactive in identifying preferred locations for development and planning for their infrastructure in order to create places and overcome constraints, rather than mainly being reactive to site promotion.

3.42   Aligning with this spatial planning approach, some planning authorities reportedly focus more on 'place' at the development planning stage, then more so on individual sites during development management. Some authorities are further noted as recognising and supporting longer term options such as patient landowners, trusts, community groups, economic development and regeneration organisations and sites.

3.43   The potential for double-handling of information at both development planning and development management stages was discussed as a cost and risk for all parties. Electronic management of information around a site's planning history and progress does appear to be minimising double-handling, although information can change over time and is amplified as more details emerge about sites, infrastructure and development proposals. Formal joint working between

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[13] Ryden would note that this is a market-wide failure since the 2008 Global Financial Crisis. Many local and regional developers either failed or cannot attract upfront funding to deliver sites – even 10 years on. The small sites and alternative sectors policies noted here may potentially help to re-stimulate these sectors.

development planning and development management in planning teams reportedly also helps to carry site information through the planning process.

3.44   In terms of infrastructure, it was suggested that some national agencies have limited involvement with sites, other than requesting costs if proposals impact their assets. Site-specific engagement with agencies often comes much later and identifies specific barriers and costs which may not have been obvious at the high level development planning and Action Programming stages.

3.45   Community engagement typically happens around the MIR rather than as part of the initial sites trawl, although some planning authorities also use earlier community-based events to consult on options. Community Council representatives also participate in Area Planning Committee meetings in one planning authority. Community engagement at MIR can reportedly consider information on facilities, routes, development formats and other local matters. The Place Standard has been used as a community consultation tool around promoted sites. There is no experience among the consultees of communities themselves acting as site promoters (rather than as objectors to proposals). Looking beyond planning reform though, it was suggested that the proposed Local Place Plans could potentially be produced in consultation with communities during the sites allocation process.

3.46   The MIR process is reportedly useful in demonstrating site effectiveness and deliverability. This is because site promoters "call each others' bluff" and thereby bring scrutiny and additional information to the process. Late submissions to this process can be a challenge, particularly where a site has been significantly enhanced - eg. attracted an active developer - since the call for sites assessment previously filtered it out. On the other hand though, consultees feel that this means a high bar has been set for allocation and site promoters are trying to meet it. The current time period between MIR and Proposed Plan then allows an opportunity for a further, considered review.

3.47   The link with the LDP Action Programme is reportedly weak at the call for sites stage. Infrastructure capacity may be broadly understood, but investment options can "rumble on" as "good intentions" rather than firm commitments. Agencies are believed to be "seen not to object" at LDP stage, while not necessarily having site-specific solutions, particularly where there are cumulative impacts. The later crystalisation of constraints and costs can then reportedly affect viability and deliverability. Programming around individual sites can sometimes help to keep the process moving, rather than becoming stuck at the frontloading stage. Engagement with agencies is sometimes via site promoters about their specific sites, and at other times by planning authorities in the process of developing their Action Programmes. Infrastructure providers can be "inundated" with site enquiries at a point where they may not (yet) have a full understanding of the spatial planning strategy and emerging development locations. A 'circular benefit' can be created where these organisations are engaged early in the development planning process and help to plan for growth.

3.48   Infrastructure impacts are reported as varying by land use type; housing impacts most upon schools; while industrial land uses have a highly uncertain impact upon roads and utilities, depending upon the actual activity. Alignment of local

authority capital programmes for schools, local roads, community uses and so on is reportedly mixed, but is gradually becoming more embedded in Action Programmes. The need to embed local infrastructure delivery within City / Region Deals and into the National Planning Framework was noted. For smaller and rural areas though, it was cautioned that the infrastructure-and-development delivery programming being pursued in principal cities is "abnormal" in the wider Scottish land and development industry.

3.49   The credibility of information provided in response to calls for sites was questioned, not only by planning authorities but also by the development industry. Much of the information requested can be self-selecting 'yes/no', brief comments, or optional (see the information gaps at Questions 5 and 6 above). This invites positive or partial (in both senses) responses, as a bid to stay in the "land game". Information provided in this manner is thought unlikely to be particularly helpful in assessing site deliverability. Partial responses are not necessarily short and may contain numerous documents; this is countered in one area by providing a detailed sites information form and not accepting supplementary information.

4 A Framework for Assessing The Deliverability of Site Allocations
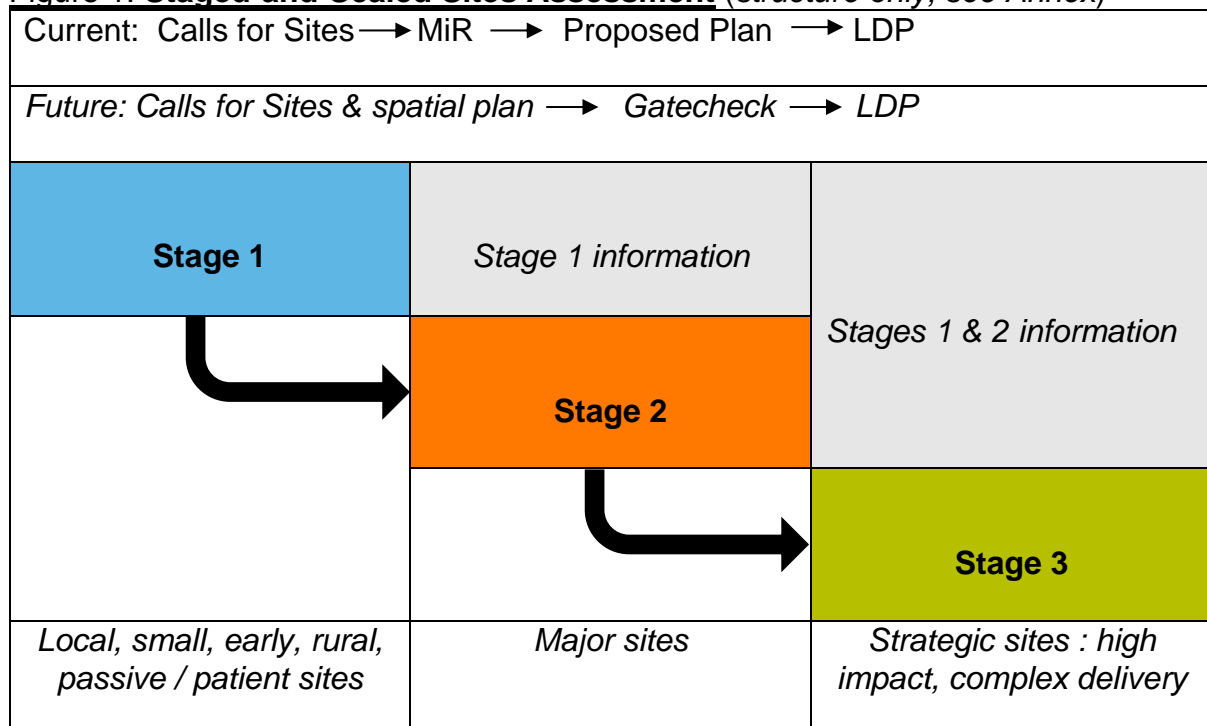
Introduction and Approach

4.1   This chapter applies the research in Chapters 2 and 3 to the Scottish Government's brief for the deliverability of site allocations set out in Chapter 1.

4.2   While the framework presented here is based upon detailed research and consultation, the Scottish Government requires that it should be **brief** and **practical**, and the associated information requirements **proportionate**.

4.3   The principal aim of the framework, therefore, is to identify a suite of information which is appropriate and proportionate to a site being considered for allocation. The information should not only identify the site and its potential, but also those factors which may constrain or impede that potential, ie. its deliverability.

4.4   The research has confirmed that Scotland allocates a broad mix of sites through its development planning system. For reasons of demand and need, though, the current land use focus is very much on housing and its associated infrastructure. The sites assessment framework needs to address that predominant concern, while recognising that not all development is market housing in high demand areas with pressurised infrastructure. It is suggested here that the direction of travel in England and Wales, with housing development viability increasingly becoming a decisive factor in allocating land, is insufficiently nuanced for Scotland's range of locations, markets and land uses. Viability is an important source of information to be interrogated in support of deliverability. But, if used as decisive in plan-making, it risks creating a market-led focus on prime areas only and risks the avoidance of public goods such as infrastructure and affordable housing. Moreover, excessive information requirements around development viability could present too high a 'hurdle' for smaller, non-professional organisations and/or in weaker markets.

4.5   The framework has been designed using the research presented here, supported by a full review of existing call for sites forms operated by Scottish planning authorities. It seeks to improve confidence in deliverability across different site types, uses, geographies, and from LDP allocation forwards through the planning system.

4.6   The framework for sites assessments is presented in the Annex. Its purpose is two-fold:

- To be applied as a site **progresses** from a bid towards an allocation and a planning application.

- To be applied **proportionately** to sites in different circumstances: size, use, location types, promoter/ owner type(s), infrastructure impacts and mitigations.

4.7 This **staged-and-scaled** approach to sites assessment responds to Proposal 5 of People, Places and Planning, by focusing on the effectiveness of sites and when they can be delivered. Consultation responses to People, Places and Planning agreed that information could strengthen development plans, but noted that such information in the early stages of a proposal can change, some site promoters will not have certain information (for example regarding viability), and that confidence in delivery of site allocations is only possible up to a point. The staging and scaling of site information accommodates those concerns.

4.8 The stages and scales set out in the framework are illustrated below:-

Figure 1: **Staged-and-Scaled Sites Assessment** (*structure only, see Annex*)

Current: Calls for Sites ⟶ MiR ⟶ Proposed Plan ⟶ LDP		
Future: Calls for Sites & spatial plan ⟶ Gatecheck ⟶ LDP		
Stage 1	*Stage 1 information*	*Stages 1 & 2 information*
	Stage 2	
		Stage 3
Local, small, early, rural, passive / patient sites	*Major sites*	*Strategic sites : high impact, complex delivery*

Stage 1 Sites Assessment

4.8.1 **Stage 1** (see Annex). This first stage is intended to provide sufficient information to conduct a sieve of promoted sites. The assessment can also include sites from other sources such as existing allocations, planning authority allocations, community-led suggestions and unbuilt consents, planned disposals and demolitions, and can be used to quickly screen any windfall gap sites or regeneration areas.

4.8.2 The Stage 1 assessment includes site and promoter information, land use proposals, descriptions and proximity to facilities. The assessment form indicates a **single link** to relevant policy and infrastructure information on the LDP website to identify any issues relating to natural heritage and environment, historic environment or other potential constraints.

4.8.3 Critically, the sites in this first sieve are intended to be subject to a **spatial planning** approach. The details and extent of this can be determined by

the planning authority within national policy and guidance. Principal concerns are likely to include areas and targets identified at a national/ strategic planning level, existing allocations, settlements, infrastructure and so on, to determine whether sites or groups of sites accord with the broad emerging Plan and use that information to consider allocations (or to seek further potential sites in preferred areas). In a plan-led system where deliverability is a principal concern, spatial planning should work symbiotically with market considerations. Deferring or demoting spatial planning considerations during the site allocation process risks skewing development planning towards a more market-led process.

4.8.4 Markets, viability and funding are however clearly the linchpin of deliverability - assuming that a site is not unacceptable in broad policy terms and is physically feasible to develop. At this Stage 1 sites sieve it will therefore be appropriate to identify that there are:

- a willing landowner; and,

- a willing developer or note of market potential; and,

- awareness of any policy requirements and infrastructure context; and,

- confirmation that in these contexts the site is believed to be viable (or if not then there is a potential deficit funding solution).

Site promoters will be acknowledging in their bids that they are aware of these considerations in stating that their site is believed to be viable. Smaller, local sites are less likely than major sites to require significant infrastructure upgrade(s), although of course each site's circumstances are different and some flexibility is likely to be required.

4.8.5 Stage 1 is potentially a reasonable holding pool for: local / smaller sites (up to 50 houses or 2 hectares); some rural sites; employment/ commercial/ institutional sites in single ownership; sites held by patient but willing landowners with no developer yet committed; sites where interest has only recently been secured; and emerging public sector sites for regeneration. The aim is to avoid 'pricing out' those sites which may have planning merit but are not yet able or required to meet a higher hurdle for information and deliverability. These types of sites may not merit a Stage 2 assessment pre-allocation, unless there is specific reason to do so.

4.8.6 Stage 1 will yield three types of outcome for sites:

- Sites **not proposed** for development plan allocation.

- Sites **proposed** for allocation where further information will not be sought. In the interest of transparency and best information there may some minor further dialogue with promoters or other organisations. These sites could proceed straight to proposed allocation.

- Sites where **further information** is required via a Stage 2 assessment.

It will be important for planning authorities to confirm to each site promoter which outcome is being recommended for their candidate site.

Stage 2 Sites Assessment

4.8.7 **Stage 2** (see Annex). The stage 2 sites assessment is intended for major sites (>50 houses / 2 hectares) which are being promoted for development plan allocation. Information to support deliverability is developed and added to become more specific. This is because major sites are on balance more likely to have a degree of complexity (and cost) of infrastructure investment, ownership, developer interest, development mix and phasing. In delivery terms they are individually more important, but also likely to be more challenging. A higher bar needs to be set for their deliverability.

4.8.8 Thus, Stage 1 sought information and promoter <u>awareness</u> of factors affecting deliverability for smaller / simpler sites, to allow these to be considered and screened for potential allocation. Stage 2 now seeks <u>evidence</u> of factors affecting deliverability, for larger / more complex sites. The methodology should begin to create a definitive suite of information to support larger / more complex site allocations, and to identify and request information to fill gaps, or to note for later detailed analysis.

4.8.9 The 'major sites' threshold is not intended to be prescriptive. It may be that slightly smaller sites with potentially high or complex impacts, particularly cumulative, also require Stage 2 assessment. Equally, some larger sites that are the already-serviced next phases of strategic expansions may be dealt with via a Stage 1 assessment then a planning application. Or, the site in question may be in a growth/ regeneration area with agreed potential but no active site promoter, where only Stage 1 information is currently available, but a masterplan requirement is set out in the LDP.

4.8.10 Within the broad site assessment stages, planning authorities can therefore develop their own approach and guidance appropriate to their locations, sites and market circumstances.

4.8.11 The staged process with clear and progressive infrastructure interrogation should also allow the development of better information flows into the LDP Action / Delivery Programme.

4.8.12 Under the extant planning system the equivalent of a Stage 2 assessment can currently happen at different times (see Section 3). Some authorities request this level of detail upfront, some seek it in support of promising site proposals, and others receive it later during plan-making, or at application.

4.8.13 The main <u>additions</u> to the sites assessments at Stage 2 are: further information on the land use (eg. layout plans), development mix and anticipated phasing; any community engagement; and site conditions[14]. A full suite of affirmative infrastructure statements and any supporting evidence is now required including confirmation of enquiries and broad capacity (but not proposals for mitigations of any constraints at this stage).

4.8.14 In terms of market, viability and funding assessments, the <u>additional</u> information to be sought at Stage 2, necessary and proportionate to understanding deliverability is:

- For **housing** uses, a summary report of **target markets**, formats, tenures and the proportion of each type anticipated. **Evidence of development viability**. <u>Rates</u> and <u>sources</u> for: development cost (construction, services, abnormals), sales prices / anticipated values, fees & finance, profit margin, any deficit funding and anticipated land value. This is sensitive and may require non-disclosure agreements between the promoter and the planning service, and a recognition that variables can and will change with markets and as proposals are worked-up. Independent advice may be required, although where authorities receive information across sites and over time, their internal capacity to compare and evaluate headline viability data could be encouraged.

- For **employment, institutional and commercial** uses, a summary report of the potential **target markets**, anticipated user types and potential activity (eg. workers, customers, students, visitors) on site.

Stage 3 Sites Assessment

4.8.15 **Stage 3** (see Annex). The largest formal definition in the planning system is 'major', as noted above at 4.8.7. This fails to capture that development planning has sought, and site promoters propose, much larger sites for allocation. These are variously termed Strategic Development Areas, Community Growth Areas, Major Development Areas or similar. Some of these are being delivered, some are stranded and some are stalled, often for infrastructure cost and delivery reasons. Much of the uncertainty over deliverability stems from their long term nature and 'step change' infrastructure requirements. Assessing the deliverability of these high cost, high impact allocations thus demands a much higher hurdle than local or

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[14] The Steering Group noted that site conditions for previously developed land can be a major variable which is difficult to capture in a standard sites assessment template. This was also evident in the calls for sites forms used by different planning authorities and in consultations with, for example, former mining areas or former heavy industry areas having a particular need to understand whether sites are affected.

major sites. This may already be recognised where for example an LDP identifies that a masterplan is required for a very large site.

4.8.16 The term 'strategic allocation' is used here. The scale may vary, but most will be housing-led and of high significance and impact with an LDP area. Most LDP areas will have very few strategic allocations. Various broad benchmarks could be applied. For example in housing, a target build rate of 50 units per annum would yield 250 units over a 5-year LDP period; anything much larger would span more than one Plan. More than 200 units usually requires a secondary road access, introducing design and servicing complexity. Faster delivery rates would imply multi-developer sites, which have their own complexities. It would be beneficial to assess the thresholds applied to housing and other types of development by planning authorities[15], infrastructure agencies and perhaps by developers.

4.8.17 It may be that the threshold for a 'strategic allocation' will vary by planning authority area; for example the 250 housing units noted above might fit into a major city housing estate regeneration without any step-change impacts. One simple test may be that if a Stage 2 assessment identifies that a site is clearly viable and has no infrastructure challenges, then it need not move to a Stage 3 strategic allocation assessment even if the development scale is significant.

4.8.18 The amplified information requirements at Stage 3 reflect the much more significant Plan and market roles of strategic allocations, and their higher impacts and delivery risks. This scaled approach to site assessment also supports a place-based approach to plan-making. The amplified requirements are in only two areas: the benefits of the proposals; and development viability.

4.8.19 In terms of development viability, the additional information to be sought at Stage 3, necessary and proportionate to understanding deliverability, is a **development appraisal.** This should show construction costs, abnormal costs, service and infrastructure costs, policy requirements, sales prices/ values, fees and finance rates, profit margin(s), and deficit funding and the

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[15] For example:

- Perth & Kinross Council's Proposed Local Development Plan 2 Policy 23: Delivery of Development Sites requires that for "sites of **300 houses or more** the Delivery Strategy should demonstrate how delivery will be maximised, including proposals for involving a range of developers and provision for self-build."

- Aberdeenshire Council's Development Management Manual identifies:
  o Scale 1: Very large **>600 houses**, multi-use, more than one site, more than one 5 year development period and more than one developer
  o Scale 2: Large 50-600 houses, multi use, single neighbourhood, single site

resulting residual land value[16]. This is sensitive and may require non-disclosure agreements between the promoter and the planning service.

4.8.20 Independent verification of development appraisals via the District Valuer, local authority panel surveyor appointment or RICS-appointed expert is likely to be appropriate. It is not anticipated that the number of strategic sites will be large, but the volume of work associated with each may be significant.

4.8.21 Extreme caution will be required when dealing with long term proposals. The later phases of these may not be confirmed in terms of development potential and funding solutions. It may be appropriate to focus development appraisal initially on the phases within the proposed LDP and the links of those with the Action Programme. Less demanding (eg. Stage 2) viability information could be sought for future phases around an indicative masterplan. Some information has a long shelf life (for example remediation costs may be subject only to price inflation) whereas other information (for example schools capacity, sales prices and viability) can decay rapidly. A fully discounted long term strategic allocation including all infrastructure and policy requirements may show marginal or negative viability (which may of course highlight where targeted public resources could potentially support wider plan outcomes).

4.8.22 The Steering Group advised that these substantial information and assessment requirements for strategic allocations could encourage a "co-production" between the promoter, planning authorities and their local authorities, infrastructure providers, agencies, statutory bodies and communities.

4.8.23 The extent of information required for Stage 3 strategic sites allocations, to understand and ensure their deliverability, has some commonality with Ryden's 2016 report[17] for the Scottish Government on Planning Permission in Principle Allocations – PPiP(A)s. The planning review consultation did not support an automatic consent for allocated sites, due to the potentially excessive front-loaded information requirements. However, some of that front-loading recurs in the Stage 3 assessment described above.

Functionality

4.9   The information technology functionality associated with current calls for sites and assessments varies across planning authorities. Generally though, it is weak compared with other data-and-information-dependent industries. A typical

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[16] As an output from the appraisal, not the site price as an input.

[17] Planning Permission in Principle for Sites Allocation in the Development Plan (Ryden, 2016)

planning authority captures sites information on (hundreds of) pro formas then transfer the results to tables, matrices and short reports, although some do also link to planning Geographic Information Systems (GIS).

4.10   The points below are suggestions for enhancement of functionality when collating and analysing sites information. Although the Annex to this report is presented as printed pages, it is built as a spreadsheet capable of being developed to deliver some of this functionality. The comments below are however simply observations and the research project does not have a full audit of planning authority practice nor the ICT skills required to make detailed recommendations-

    4.10.1 Sites assessment worksheets issued to promoters should have embedded **hyperlinks** to all policies, maps, agency and infrastructure information where this is (or will be) available online. For example mapping of landscape policy areas, utilities infrastructure[18], school rolls and any related policy requirements set by the planning authority.

    4.10.2 Sites information should **minimise open-ended questions** and free text[19]. Where possible fields should be yes/no then direction for further evidence, or data such as housing numbers, floorspace and phasing, with appropriate links to further information. The data should aggregate across cell / and forms to drive analytical tools (for example to aggregate housing numbers across areas and the Plan and to map using grid references). Planning authorities will wish to allow for supporting evidence to be attached where this answers a question (eg. consultation response from a key agency), but may or may not accept other documents (eg. marketing brochures).

    4.10.3 The staged sites assessment should form part of a site's **planning history** within the GIS / portals operated by authorities. This will record information for sites not allocated, sites allocated and sites carried through to planning applications and development management.

    4.10.4 The analyses drawn from the sites assessment should link <u>directly</u> to the **Action Programme**. This should be not only in the emerging Action Programme, but through the testing of sites options, impacts and mitigations, and then following LDP adoption as a monitoring tool as development and infrastructure investment proceed. There is also a potential link to be explored here with data collation and reporting for

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[18] For example:

Gas distribution network developer information: www.sgn.co.uk/Publications/Infrastructure-Developers/

Electricity distribution network: https://www.ssepd.co.uk/Connections/Developers/

Water: www.scottishwater.co.uk/business/Connections/Connecting-your-property/Planning-Your-Development

[19] This is not only to aid analysis and interpretation but also to help close the information gap identified in Section 3.

annual Housing Land Audits to avoid duplication and promote deliverability.

4.10.5 Looking to the future, **digital software models** could help to determine whether allocations are optimum or not. For example, layered mapping of constraints, infrastructure capacity and infrastructure investment proposals could inform site allocations. Standardised development viability assessment tools may also be appropriate [20]. However, the fragmentation of infrastructure, development and planning industries, the iterative nature of development proposals and market change, and the legalistic basis of planning in competitive markets, make this technocratic approach improbable any time soon.

Recommended Actions

4.11 The research has demonstrated that site promoters seeking allocations in development plans provide only limited information. Site promoters may provide the physical <u>site</u> deliverability information, but typically not the market and viability information to support confidence in <u>development</u> deliverability. Outside of 'market-led' areas, promoters provide very little to allow deliverability to be assessed. Planning authorities wish to understand end-point deliverability, but for site promoters allocation is an early, uncertain step in a first-past-the-post system that hinges around, "site-specific arguments". [21]

4.12 The concept of viability within deliverability is valid, but its application must be treated with caution. Many market sectors and locations in Scotland will struggle to fully fund all land assembly, site works, infrastructure, policy requirements and development on a 'day one' assessment. Seeking funding solutions and value-engineering during and post-allocation are normal activities. The sites allocation process should embed market realities, but should not inadvertently place these ahead of spatial planning considerations. This will be particularly important as Action / Delivery programmes are bound more tightly into the process of land releases.

4.13 The sites assessment approach presented above is devised in response to the Scottish Government's brief and these research findings. The recommended actions flowing from this work programme are:

4.13.1 The Scottish Government should review the "**staged and scaled**" approach to sites assessment set out here and consider the extent to which that approach **can provide greater confidence in the deliverability of site allocations**.

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[20] For example, the Three Dragons Toolkit uses standard market information in lieu of project-specific development data: https://three-dragons.co.uk/toolkits/

[21] *Planning*, Collar, 2010. The 'site-specific argument' point was made in the 3rd edition (2010) at the transition to LDPs and is not repeated in the 4th edition (2016), but neatly summarises the market reality.

4.13.2 The research has taken a high level, combined review of sites allocation across Scotland's planning authorities. The staged and scaled approach is intended to allow flexibility across and within authority areas. The approach requires to be tested in a **pilot study** with one or more planning authorities about to commence the preparation of their plan. The pilot study should also examine and test options to integrate sites assessment information with the Action / Delivery Programme. This will move the research 'in market' to determine how it could work in practice.

4.13.3 The staged and scaled sites assessment requires to be appraised against the **emerging reforms** to the planning system. Currently the assessment of called-for sites comes before the completion of the Strategic Environmental Assessment and publication of the Main Issues Report. The call for sites is not itself a statutory or policy requirement, but as shown by this research has become the dominant mode of identifying potential new site allocations. A conceptual view of the new system is shown along the top of Figure 1 above. Some suggestions for possible impacts and interactions with planning reforms are made below:

- If the Local Development Plan is to remain extant for 10 years rather than 5, the staged site assessment process will require to mesh with any proposals for interim review and associated changes to allocations. Given the predominance of housing in sites proposed for allocation, classifying housing sites as effective in annual Housing Land Audits would become more influential between 10-year LDPs.

- The removal of Strategic Development Plans would make the spatial planning exercise suggested above a more important exercise, along with any new cross-authority regional planning initiatives.

- The role of a 'gatecheck' in the absence of a Main Issues Report requires further analysis, potentially through the current pilot study.

- The role of proposed Local Place Plans at each suggested stage of the sites assessment requires further consideration to ensure that the intentions and outcomes align.

4.13.4 Further consideration is required of the **protocols** for requesting and using information from **infrastructure** agencies. The information fields and thresholds used in sites assessments should where possible align with those used by the agencies themselves. There should be a consistent approach taken through sites assessments, Action / Delivery Programming and monitoring. The National Infrastructure Delivery Group may have a role in this. This two-way approach will have the benefit of binding infrastructure agencies more closely into the allocation process, including assessing deliverability.

4.13.5 Staged and scaled sites assessments undertaken on a broadly consistent basis using information systems could allow collation and analysis of **data across Scotland** on the sites allocation process and outcomes. This could inform both the sites assessment approach itself and the wider

planning process in terms of sites proposed, rejected, allocated and developed. Site proposals and allocations could form the early base dataset for planning system-wide analysis and reporting.

4.13.6 The staged and scaled sites assessment may be more **resource-intensive** for some planning authorities than their current approaches. The new standard would mean not only handling and validating more sites information, but for sites preferred in planning terms without active promoters, for example emerging through communities, the authority itself may need to provide some of the sites assessment information to at least reach a Stage 1 assessment. Better software-based information handling may help to manage the process. Closer working between Development Planning and Development Management may have some skills benefits, front-load sites assessments and remove duplication. Skills issues may be better dealt with through consulting with external agencies and advisers, although a general understanding of viability for planners is also increasingly important.

4.13.7 For site promoters, the Stage 1 resource implications should be modest – mainly fact-checking and provision of site information and related correspondence rather than any new analyses. At Stages 2 and 3, there is front-loading of analyses for site promoters and more detailed information in comparison with some current planning authorities' requirements, but not when compared against some of the more detailed calls for sites currently in use in Scotland. The exception is for viability, for which higher standards are suggested here at all stages of site assessment.

4.13.8 In the context of planning authority resource pressures, 34 separate planning authority approaches to sites assessment using a staged method is a challenge. There are two potential ways to **aggregate** the process to achieve efficiencies:

- In addition to guidance and templates, the Scottish Government's Digital Taskforce or planning authorities via Heads of Planning Scotland could sponsor **software solutions** which could be adopted across authorities both to collate and assess sites information and link this to planning system portals and GIS, and;

- The optimum geography for sites assessment may, where LDP cycles can be aligned, be more than one adjoining planning authority area, sharing expertise and working across **regional geographies** such as housing market and transport areas.

4.13.9 Finally, if the Scottish Government decides to support a more standardised, staged and scaled approach to sites assessment for proposed allocations as set out in this report, then any pilot study could inform **national guidance** to be agreed with and rolled-out through Heads of Planning Scotland.

Annex:

Sites assessments templates

Stage 1 Assessment

Site details				
OS grid reference				
Name of the site				
Site address				
Site size (in hectares)				
Current land use				
Neighbouring land use(s)				
Physical constraints (eg substations, pylons)				
Topography and site orientation				
Land type	Previously developed	☐	Greenfield	☐
If previously developed are you aware of any contamination affecting the site	Yes ☐ Please specify		No ☐	
Include an Ordnance Survey plan (1:1250, 1:2,500 or 1:5000). The site boundary should be outlined in red and show points of access, means of drainage etc.				

Who are you ? (please tick)			
Sole owner	☐	Agent	☐
Part owner	☐	Option to purchase	☐
		No Legal interest	☐

Your Details	
Name	
Organisation (if applicable)	
Address	
Telephone number	
E-mail address	

Ownership			
If not sole owner, provide owners (name, organisation, address and contact details)			
Do these owners know this site is being proposed for development?	Yes ☐	No ☐	

Planning history			
Has contact been made with planning officers?	Yes ☐ Provide evidence	No ☐	
Any previous planning history or consents?	Provide evidence		

Indicative proposal			
Brief description of proposed use			
If housing is proposed what is the number of units?	number ☐	or hectares ☐	
If other uses are proposed what is the floorspace?	floorspace sq.m. ☐	or hectares ☐	
Proximity to local shops, facilities and public transport	<400m ☐ 400 - 800m ☐ >800m ☐		

Legal			
Are there any legal factors which may prevent, or restrict, development? (eg wayleaves, restriction on land use, rights of way, ransom strips, access issues etc)	Yes ☐ Please specify	No ☐	

Potential Constraints

Natural Heritage and Environment

Is the site affected by being in or close to any protected natural heritage or environmental designations? Please review the policy maps and check any boxes if affected.	*hyperlinks to suite of maps and policies on LDP website, for example :*	
	Hyperlink to Scotland's Environment website	☐
	Hyperlink to Scottish Natural Heritage protected area search	☐
	Hyperlink to Biodiversity Scotland priority habitats	☐
	Local Nature Conservation Sites (as per local authority)	☐

Historic Environment

Is the site affected by any historic environment designations? Please review the designations and check any boxes if affected.	*hyperlinks to suite of maps and policies on LDP website, for example :*	
	Hyperlink to Historic Scotland Designations Map	☐
	Hyperlink to Historic Environment Scotland heritage portal	☐
	Link to Local Authority Sites and Monuments record	☐

Other potential constraints

Is the site affected by any other potential constraints? Please follow links and check box if site is affected	Hyperlink to Local Authority Green Belt map	☐
	Hyperlink to HSE policy (hazardous sites and consultation zones)	☐
	Overhead lines or underground cables	☐
	Hyperlink to Scotland's Environment soils map (prime agricultural land)	☐

Viability			
Please confirm that the site is viable	Willing landowner		☐
	Willing developer Please attach details		☐
	Market potential Please attach details		☐
	Awareness of any policy requirements Hyperlink to local authority LDP		☐
	Awareness any infrastructure requirements (eg. water, drainage, roads) Hyperlink to Scottish Water asset capacity search Hyperlink to Local Authority education department school roll forecasts Hyperlink to Transport Scotland contact details Hyperlink to Local Authority transportation contact	Yes ☐	No ☐ If yes please specify
If the site is <u>not</u> viable please indicate that deficit funding is potentially available	Yes ☐ Please provide further information		

Stage 2 Assessment

Site details

OS grid reference	
Name of the site	
Site address	
Site size (in hectares)	
Current land use	
Neighbouring land use(s)	
Physical constraints (eg substations, pylons)	
Topography and site orientation	

Land type	Previously developed	☐	Greenfield	☐

Include an Ordnance Survey plan (1:1250, 1:2,500 or 1:5000). The site boundary should be outlined in red and show points of access, means of drainage etc.

Who are you ? (please tick)

Sole owner	☐	Agent	☐
Part owner	☐	Option to purchase	☐
		No Legal interest	☐

Your Details

Name	
Organisation (if applicable)	
Address	
Telephone number	
E-mail address	

Ownership

If not sole owner, provide owners (name, organisation, address and contact details)			
Do these owners know this site is being proposed for development?	Yes ☐	No ☐	

Planning history

Has contact been made with planning officers?	Yes ☐ Provide evidence	No ☐
Any previous planning history or consents?	Provide evidence	

Legal

Are there any legal factors which may prevent, or restrict, development? (eg wayleaves, restriction on land use, rights of way, ransom strips, access issues etc)	Yes ☐ Please specify	No ☐

Proposed Use

Housing

Approx number of units		
Proposed mix of house types. Number of :	Detached	☐
	Semi-detached	☐
	Terraced	☐
	Flats	☐
	Other (eg. bungalows)	☐
Proposed mix of size. Number of :	1 bedroom homes	☐
	2 bedroom homes	☐
	3 bedroom homes	☐
	4 or more bedroom homes	☐
Tenure Number of :	Private for sale	☐
	Private rented	☐
	Affordable	☐
	Self build	☐
	Supported (eg. for the elderly)	☐
	Other Please specify	☐
Affordable housing proportion	☐ %	

Employment

Business and offices	indicative floorspace	sq.m. ☐	or hectares	☐
General industrial	indicative floorspace	sq.m. ☐	or hectares	☐
Storage and distribution	indicative floorspace	sq.m. ☐	or hectares	☐

Other

Proposed use	specify proposed type	indicative floorpsace sq.m. ☐
		or hectares ☐
Do you have a specific occupier for the site?	Yes ☐ Provide details if possible	No ☐

Delivery timescales / Phasing

Is there a realistic prospect of the site being developed within the LDP period?	Yes ☐ What year do you expect development to start? ☐	No ☐
Will the development be built in phases?	Yes ☐ Provide details	No ☐
When do you expect the development to be finished?	0 - 5 years ☐ 6 - 10 years ☐ 10+ years ☐	

Community engagement

| Have you engaged with any community consultation? | Yes ☐

Please specify | |
| | Not yet ☐

Please specify how you will do | |

Site conditions

Flood risk

Is any part of the site at risk from flooding on the 2014 SEPA flood risk maps? Hyperlink to SEPA flood risk map	Yes ☐ What assessments have been made to address this issue?	No ☐
Has contact been made with SEPA in relation to this issue?	Yes ☐ What was the outcome? attach relevant correspondence	No ☐
Could development on site result in additional flood risk elsewhere?	Yes ☐ How do you intend to mitigate this risk?	No ☐
Could development on site help alleviate existing flooding problems in the area?	Yes ☐ Provide details	No ☐

Contamination

| Is the site subject to any potential contamination issues? | Yes ☐

What assessments have been made to address this issue? | No ☐   Unknown ☐ |
| Has contact been made with SEPA in relation to this issue? | Yes ☐

What was the outcome? attach relevant correspondence | No ☐ |

Infrastructure

Water / drainage

| Is there water / waste water capacity for the proposed development?

Hyperlink to Scottish Water asset capacity search | Water :
Yes ☐

No ☐ | Waste water :
Yes ☐

No ☐ |
| Has contact been made with Scottish Water in relation to this issue? | Yes ☐

What was the outcome? attach relevant correspondence | No ☐ |

Education (housing proposals)

| Has contact been made with the Council education department? | Yes ☐

What was the outcome? attach relevant correspondence | No ☐ |
| Are there any capacity constraints within the local primary or secondary schools ? | Yes ☐

Provide specify | No ☐ |

Transport

| Has contact been made with Transport Scotland and/ or the Council roads service? | Yes ☐

What was the outcome? attach relevant correspondence | No ☐ |

Has a Transport Appraisal been undertaken? To include access, public transport, walking and proximity to local services and facilities including shops	Yes ☐ Summarise findings	No ☐

Potential Constraints

Natural Heritage and Environment

Is the site affected by being in or close to any protected natural heritage or environmental designations ? Please review the	*hyperlinks to __suite__ of maps and policies on LDP website, __for example__ :*	
	[Hyperlink to Scotland's Environment website](#)	☐
	[Hyperlink to Scottish Natural Heritage protected area search](#)	☐
	[Hyperlink to Biodiversity Scotland priority habitats](#)	☐
	Local Nature Conservation Sites (as per local authority)	☐

Historic Environment

Is the site affected by any historic environment designations ? Please review the designations and check any boxes if	*hyperlinks to __suite__ of maps and policies on LDP website, __for example__ :*	
	[Hyperlink to Historic Scotland Designations Map](#)	☐
	[Hyperlink to Historic Environment Scotland heritage portal](#)	☐
	Link to Local Authority Sites and Monuments record	☐

Other potential constraints

Is the site affected by any other potential constraints? Please follow links and check box if site is affected	Hyperlink to Local Authority Green Belt map	☐
	Hyperlink to HSE policy (hazardous sites and consultation zones)	☐
	Overhead lines or underground cables	☐
	[Hyperlink to Scotland's Environment soils map (prime agricultural land)](#)	☐

Viability

Please confirm that the site is viable	Willing landowner	☐
	Willing developer Please attach details	☐
	Market potential Please attach details	☐
	Awareness of any policy requirements Hyperlink to local authority LDP	☐
If the site is <u>not</u> viable please indicate that deficit funding is potentially available	Yes ☐ Please provide further details	

Viability Data (indicative)

Development costs (contstruction and on-costs eg fees)	Rate per sq.m.	☐	Source	☐
Services / infrastructure / abormal costs	Costs	☐	Source	☐
Anticipated sales prices / values (mean)	Rate per sq.m.	☐	Source	☐
Developers profit margin	Percentage	☐	Source	☐
Anticipated land value (net developable)	Rate per hectare	☐	Source	☐
Please indicate whether this viability data is commercially confidential	Yes ☐ Please explain why		No ☐	

Stage 3 Assessment

Site details

OS grid reference	
Name of the site	
Site address	
Site size (in hectares)	
Current land use	
Neighbouring land use(s)	
Physical constraints (eg substations, pylons)	
Topography and site orientation	

Land type	Previously developed ☐	Greenfield ☐

Include an Ordnance Survey plan (1:1250, 1:2,500 or 1:5000). The site boundary should be outlined in red and show points of access, means of drainage etc.

Who are you ? (please tick)

Sole owner	☐	Agent	☐
Part owner	☐	Option to purchase	☐
		No Legal interest	☐

Your Details

Name	
Organisation (if applicable)	
Address	
Telephone number	
E-mail address	

Ownership

If not sole owner, provide owners (name, organisation, address and contact details)			
Do these owners know this site is being proposed for development?	Yes ☐	No	☐

Planning history

Has contact been made with planning officers?	Yes ☐ Provide evidence	No	☐
Any previous planning history or consents?	Provide evidence		

Legal

Are there any legal factors which may prevent, or restrict, development? (eg wayleaves, restriction on land use, rights of way, ransom strips, access issues etc)	Yes ☐ Please specify	No	☐

Proposed Use

Housing

Approx number of units		
Proposed mix of house types. Number of :	Detached	☐
	Semi-detached	☐
	Terraced	☐
	Flats	☐
	Other (eg. bungalows)	☐
Proposed mix of size. Number of :	1 bedroom homes	☐
	2 bedroom homes	☐
	3 bedroom homes	☐
	4 or more bedroom homes	☐
Tenure Number of :	Private for sale	☐
	Private rented	☐
	Affordable	☐
	Self build	☐
	Supported (eg. for the elderly)	☐
	Other Please specify	☐
Affordable housing proportion	☐ %	

Employment

Business and offices	indicative floorspace sq.m. ☐	or hectares	☐
General industrial	indicative floorspace sq.m. ☐	or hectares	☐
Storage and distribution	indicative floorspace sq.m. ☐	or hectares	☐

Other

Proposed use	specify proposed type	indicative floorspace sq.m. ☐
		or hectares ☐
Do you have a specific occupier for the site?	Yes ☐ Provide details if possible	No ☐

Delivery timescales / Phasing

Is there a realistic prospect of the site being developed within the LDP period?	Yes ☐ What year do you expect development to start? ☐	No ☐
Will the development be built in phases?	Yes ☐ Provide details	No ☐
When do you expect the development to be finished?	0 - 5 years ☐ 6 - 10 years ☐ 10+ years ☐	

Community engagement

| Have you engaged with any community consultation? | Yes ☐

 Please specify | |
| | Not yet ☐

 Please specify how you will do | |

Site conditions

Flood risk

Is any part of the site at risk from flooding on the 2014 SEPA flood risk maps? Hyperlink to SEPA flood risk map	Yes ☐ What assessments have been made to address this issue?	No ☐
Has contact been made with SEPA in relation to this issue?	Yes ☐ What was the outcome? attach relevant correspondence	No ☐
Could development on site result in additional flood risk elsewhere?	Yes ☐ How do you intend to mitigate this risk?	No ☐
Could development on site help alleviate existing flooding problems in the area?	Yes ☐ Provide details	No ☐

Contamination

| Is the site subject to any potential contamination issues? | Yes ☐

 What assessments have been made to address this issue? | No ☐ Unknown ☐ |
| Has contact been made with SEPA in relation to this issue? | Yes ☐

 What was the outcome? attach relevant correspondence | No ☐ |

Infrastructure

Water / drainage

| Is there water / waste water capacity for the proposed development?

 Hyperlink to Scottish Water asset capacity search | Water :
 Yes ☐

 No ☐ | Waste water :
 Yes ☐

 No ☐ |
| Has contact been made with Scottish Water in relation to this issue? | Yes ☐

 What was the outcome? attach relevant correspondence | No ☐ |

Education (housing proposals)

| Has contact been made with the Council education department? | Yes ☐

 What was the outcome? attach relevant correspondence | No ☐ |

Are there any capacity constraints within the local primary / secondary school?	Yes ☐ Provide specify	No ☐	

Transport

Has contact been made with Transport Scotland and/ or the Council roads service?	Yes ☐ What was the outcome? attach relevant correspondence	No ☐	
Has a Transport Appraisal been undertaken? To include access, public transport, walking and proximity to local services and facilities including shops	Yes ☐ Summarise findings	No ☐	

Utilities

Has contact been made with the any utilities providers?

Gas Hyperlink to Scottish Gas Networks	Yes ☐ What was the outcome? attach relevant correspondence	No ☐	
Electricity Hyperlink to Scottish Power site connections	Yes ☐ What was the outcome? attach relevant correspondence	No ☐	
Broadband Hyperlink to relevant site	Yes ☐ What was the outcome? attach relevant correspondence	No ☐	
Have any feasibility studies been undertaken to understand and inform capacity issues?	Yes ☐ Provide specify	No ☐	

Potential Constraints

Natural Heritage and Environment

Is the site affected by being in or close to any protected natural heritage or environmental designations ? Please review the policy maps and check any boxes if affected.	*hyperlinks to suite of maps and policies on LDP website, for example :*	
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	Local Nature Conservation Sites (as per local authority)	☐

Historic Environment

Is the site affected by any historic environment designations ? Please review the designations and check any boxes if affected.	*hyperlinks to suite of maps and policies on LDP website, for example :*	
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	Hyperlink to Historic Environment Scotland heritage portal	☐
	Link to Local Authority Sites and Monuments record	☐

Other potential constraints

Is the site affected by any other potential constraints? Please follow links and check box if site is affected	Hyperlink to Local Authority Green Belt map	☐
	Hyperlink to HSE policy (hazardous sites and consultation zones)	☐
	Overhead lines or underground cables	☐
	Hyperlink to Scotland's Environment soils map (prime agricultural land)	☐

Benefits of proposed development

If the development proposals result in any specific benefits to the community what would these be?	
Will development of the site create any permanent jobs? Provide details	
Will development of the site bring any environmental benefits? (eg remediation of derelict land, habitat creation or restoration). Provide details	

Viability

Please confirm that the site is viable	Willing landowner	☐
	Willing developer Please attach details	☐
	Market potential Please attach details	☐
	Awareness of any policy requirements Hyperlink to local authority LDP	☐

If the site is <u>not</u> viable please indicate that deficit funding is potentially available	Yes ☐ Please provide further details			
Viability Data (indicative)				
Development costs (contstruction and on-costs eg fees)	Rate per sq.m.	☐	Source	☐
Services / infrastructure / abormal costs	Costs	☐	Source	☐
Anticipated sales prices / values (mean)	Rate per sq.m.	☐	Source	☐
Developers profit margin	Percentage	☐	Source	☐
Anticipated land value (net developable)	Rate per hectare	☐	Source	☐
Please attach a development appraisal for the phase(s) of the proposals falling within this LDP.	Appraisal attached	☐	Source	☐
Please indicate whether this viability data and / or development appraisal are commercially confidential	Yes ☐ Please explain why		No ☐	

Scottish Government
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