

Appendix A Scottish Government Consultation of Development Delivery

Response to Consultation Questions

Question 1a: Do you think the current planning system supports or hinders the delivery of development and infrastructure?

The planning system strongly supports the delivery of quality development and infrastructure. It does not accept the delivery of poor development and infrastructure which would take place in many instances if the planning system did not exist or was seriously weakened. The delivery of development and infrastructure is often outwith the planning system and depends on external factors such as easy access to finance, a market demand for the final development and the actual costs of delivering the development and infrastructure. In West Dunbartonshire there are a number of key regeneration sites which are large former industrial sites. These sites have complex development issues such as contamination, access, natural heritage, treatment to quay walls etc. These issues together with the lack of actual demand for the final development product have resulted in these sites remaining undeveloped. The planning system can be highly efficient and proactive. However, if the necessary finance and demand is not available and there is a lack of willingness by the site's owner to explore various options, then the site will remain undeveloped. A modernised and efficient planning system must be as proactive and efficient in both good and poor economic conditions.

Question 1b: What additional measures could be taken to support development and infrastructure?

The key external factor is that the finance must be available to allow the necessary infrastructure to be provided and development achieved. Often difficult to develop former industrial sites require some form of subsidy to facilitate the provision of the necessary infrastructure. A number of the key regeneration sites in West Dunbartonshire have significant infrastructure requirements such as the improvement of quay walls and their maintenance in order to allow public access to the River Clyde or the provision of an access road to allow a very large site to be developed in phases by different uses. This part of the infrastructure involves significant investment upfront without any returns and this is not viable in the current economic climate. Even in the boom years, concerns were expressed by developers regarding meeting these high infrastructure costs relative to the actual returns from the development and more recently the availability of funding has diminished which would previously have assisted with the delivery of important public realm areas within such sites. West Dunbartonshire Council (WDC) recently produced a framework for engaging with partners and developers with regards to its key regeneration sites, called an Infrastructure Investment Plan. This identifies key sites, their issues and potential sources of funding. In addition, these sites feature heavily in WDC's Local Development Plan Main Issues Report.

The Council now takes a more proactive approach in exploring how sites can be unlocked. A Developers Protocol has been produced setting out what type of service Developers can expect prior to and during the processing of planning applications and developer liaison meetings are encouraged. The work of the Planning Service and Economic Development Service is now more closely aligned to jointly progress the delivery of the Council's Economic Development Strategy and Action Plan, 2011-2016.

Question 2: How well do you think the process of seeking developer contributions through Section 75 Planning Obligations is functioning?

This Council has very little experience of seeking developer contributions through Section 75 Planning Obligations. Developers will make a financial contribution to the provision of open space and play equipment if they cannot provide it within their development. This Council has taken a decision not to seek developer contributions as a way of attracting interest into the area and encouraging development of our key regeneration sites and investment in our town centres and other development sites. It is considered that within this difficult financial climate the pursuit of developer contributions by the Council, could be detrimental to the time and resource input made by officers to build relationships with developers to assist with the delivery of major sites.

Question 3: What additional measures or support could the Scottish Government undertake or provide to facilitate the provision of development and infrastructure within the current legislative framework?

As discussed in the response to Question 1 external factors outwith the planning system are often preventing the delivery of development and infrastructure.

Question 4: What innovative approaches are you aware of to facilitate development and infrastructure delivery and what are your views on their effectiveness?

This Council has been investigating ways to facilitate development and infrastructure delivery through for example TIF (Taxation Incremental Financing) however to date it has been unsuccessful in securing funding. An assessment of funding opportunities for key regeneration sites was undertaken by the Council's Funding Officer in preparing the Council's Infrastructure Investment Plan (see 1b) and this information was forwarded to site owners/developers. The Council is now exploring various opportunities for certain sites and when appropriate will fund background feasibility studies. The Council has also been exploring how various smaller scale funding streams can be an early catalyst for longer term development. For example we have received £35,000 from the Central Scotland Green Network Fund for path enhancements and a woodland study within the Vale of Leven Industrial Estate where there are a number of remaining development sites in close proximity to the recently opened £20m Aggreko manufacturing facility. Other funding/loan streams are also being explored e.g. SPRUCE (Scottish Partnership for Regeneration in Urban Centres). TIF and SPRUCE have limited areas for eligibility in relation to key development sites in West Dunbartonshire where there is an expectation that private sector housing will still be delivered on major sites such as Queens Quay (98 acres). However the delivery of key housing sites requires the support of mortgage lenders to provide finance that local people can access to purchase such homes. Emerging models such as SPRUCE and TIF appear to be complex to manage and therefore resource intensive for Council's. Funding from the Scottish Government which supports the delivery of new key housing sites, important infrastructure such as access and quay walls along the Clyde is much needed. In addition at a more strategic level the Council has a major challenge with regards to the funding of a small section of relief road for the A82 (between Bowling and Milton) which if bottlenecked can cause a substantial diversion. The availability of an infrastructure fund for such an important facility is crucial to the economic prosperity of the area. The Lomondgate development on the edge of Dumbarton is a good example of delivering development on the ground during difficult economic times. It has been achieved through a partnership between a developer - the Walker Group and Strathleven Regeneration Company which is a company financed by the developer, local authority and Scottish Enterprise. Six weekly liaison meetings take place with the developer, the Regeneration

Company and the Council and over time they have taken on the character of team meetings and have been a key to the successful development of Lomondgate. Clydebank re-built has also been successful in securing funding to deliver workshop units at John Knox Street which are fully occupied. This has tapped into local demand and a second phase is underway at Clydebank East.

Question 5: Would you support the introduction of a Development Charge system in Scotland to assist in the delivery of development and infrastructure?

Whilst the concept of a Development Charge is supported and is preferable to developer contributions as it gives certainty and transparency to the developer it would be difficult to justify in the current economic climate. Presently it runs contrary to facilitating the early delivery of development and infrastructure.

Question 6: Do you have any information or can you suggest sources of relevant information on the costs and/or benefits to support the preparation of a BRIA?

No further comments to add.

Question 7: We would appreciate your assessment of the potential equalities impact that these issues may have on different sectors of the population.

No further comments to add.