

<b>MEETING BETWEEN MINISTER FOR LOCAL GOVERNMENT &amp; HOUSING and RICHARD HOLLAND, TAYLOR WIMPEY</b>	
<b>TIMING</b>	Wednesday 4 March, 15:00, T4.44 Parliament
<b>ATTENDEES</b>	<p>Richard Holland, Taylor Wimpey, Regional Director  Mark Skilbeck, Taylor Wimpey, UK Planning Director  Mark Cummings, Invicta</p> <p><b><u>Official Support</u></b></p> <p>[REDACTED], Planning and Architecture, [REDACTED]</p>
<b>AGENDA</b>	<p>Introduction to Taylor Wimpey</p> <ol style="list-style-type: none"> <li>1. Transforming Planning Work Programme</li> <li>2. Planning (Scotland) Act 2019: NPF4, Local Development Plans</li> <li>3. Infrastructure</li> <li>4. Fees</li> </ol>
<b>YOUR MAIN OBJECTIVE</b>	<ul style="list-style-type: none"> <li>• Improving the role of planning in supporting the delivery of high quality homes is a key driver of planning reform.</li> <li>• We are keen to collaborate with all interests in planning to guide this new phase of planning reform.</li> <li>• We would encourage you to submit your views in response to the NPF4 call for ideas, as well as being involved in wider aspects of planning reform through Homes for Scotland.</li> </ul>
<b>PRACTICAL ARRANGEMENTS</b>	<p>Micase reference 2019/00009533  Letter appended to Annex.</p>

<b>ITEM 1</b>	<b>Transforming Planning Work Programme</b>
<b>ISSUE/ BACKGROUND</b>	<p>The Planning (Scotland) Act 2019 is part of wider reforms of planning, following the recommendations of an independent panel.</p> <p>A work programme for implementing the Act and taking forward other aspects of reform was published on 30 September 2019.</p> <ul style="list-style-type: none"> <li>• A substantial programme of regulations and guidance are required to implement the Act.</li> <li>• These will be taken forward through engagement and consultation with stakeholders, before being laid in the Scottish Parliament.</li> <li>• The first sections of the Act were brought into force on 8 November 2019. Details of sections being brought into force will be available on our website.</li> <li>• The majority of the Act will be implemented by Spring 2021.</li> </ul> <p>To take forward the post-bill work programme we invited a range of stakeholders to contribute to ‘<b>Transforming Planning in Practice Working Groups</b>’ in December 2019 on areas such as development planning. Homes for Scotland are represented on these groups and the groups will reconvene early in 2020 to progress their areas of work.</p>
<b>WHAT THE STAKEHOLDER MAY SAY/ASK</b>	<ul style="list-style-type: none"> <li>• When can we expect to see the new planning system in place?</li> <li>• Will there be opportunities to influence key aspects of reform?</li> </ul>
<b>KEY MESSAGE(S)</b>	<ul style="list-style-type: none"> <li>• Our programme has been phased to reflect the level of work required as well as priorities for action.</li> <li>• The system as a whole will be in place by the end of 2021.</li> <li>• We recognise the importance of collaboration in delivering reform.</li> </ul>
<b>SUGGESTED QUESTION(S)</b>	<ul style="list-style-type: none"> <li>• Are you involved in reform through Homes for Scotland?</li> <li>• Have you submitted a response to our consultation on fees / will you respond to the NPF4 Call for Ideas?</li> <li>• What changes to the system are most important / where can the biggest improvements be made?</li> </ul>
<b>CONTACT POINT</b>	[REDACTED]

<b>ITEM 2A</b>	<b>National Planning Framework 4</b>
<b>ISSUE/ BACKGROUND</b>	<ul style="list-style-type: none"> <li>• We are currently undertaking early engagement to inform NPF4 with events throughout the country including workshops, RTPI chapter events and drop in sessions.</li> <li>• The Planning (Scotland) Act 2019 introduces changes to the hierarchy of development plans, replacing strategic development plans with regional spatial strategies and adjusting the requirements for the NPF and local development plans to address housing matters. It requires NPF to contain 'targets for the use of land in different areas of Scotland for housing.'</li> <li>• Over recent years there has been significant debate and disagreement over the approach to be used to determine whether a plan has an effective housing land supply. This has been particularly evident at development plan examinations where often the key issues addressed related to housing land supply. This has resulted in uncertainty over this issue which has led to a number of appeals and legal challenges. The emergence of NPF 4 offers an opportunity to address this issue.</li> <li>• We have prepared a technical paper that sets out our preferred approach to housing targets in NPF4 and invited key stakeholders to participate in taking this forward through a stakeholder panel.</li> </ul>
<b>WHAT THE STAKEHOLDER MAY SAY/ASK</b>	<ul style="list-style-type: none"> <li>• Can we get involved in setting housing targets?</li> <li>• Will you consider Blindwells as a national development in NPF4?</li> </ul>
<b>KEY MESSAGE(S)</b>	<ul style="list-style-type: none"> <li>• NPF4 will help to deliver development that meets our long term needs to 2050 and is highlighted as a major commitment in response to the climate emergency in the Programme for Government.</li> <li>• We are preparing NPF4 in a collaborative way and look forward to working with the housing stakeholder panel to guide the approach to setting targets.</li> <li>• We have set out our criteria against which proposals for national developments will be assessed and invited stakeholders to submit their ideas by 31 March.</li> <li>• There will also be formal consultation on the draft NPF4 when it is laid in Parliament in September this year.</li> </ul>
<b>SUGGESTED QUESTION(S)</b>	<ul style="list-style-type: none"> <li>• Will you be submitting a response to the NPF4 call for ideas?</li> <li>• Have you been involved in our roadshow events or through the RTPI chapters?</li> </ul>
<b>CONTACT POINT</b>	[REDACTED]

<b>ITEM 2B</b>	<b>Local Development Plans</b>
<b>ISSUE/ BACKGROUND</b>	<ul style="list-style-type: none"> <li>• The Planning (Scotland) Act 2019 introduced significant changes to the system of development plans.</li> <li>• We will bring forward regulations and guidance that build on the Act and put in place new style local development plans.</li> <li>• Key changes including the move to a 10 year review cycle, the introduction of the evidence report and gatecheck, stronger links with community planning and improved delivery programmes.</li> <li>• We also supported amendments at stage 3 of the Bill that will ensure that where at Examination the Reporter concludes that insufficient land has been allocated for housing, the plan can be returned to the planning authority.</li> </ul>
<b>WHAT THE STAKEHOLDER MAY SAY/ASK</b>	<ul style="list-style-type: none"> <li>• How will you ensure local development plans are consistent with the National Planning Framework targets?</li> <li>• How will you get authorities to have a sharper focus on the deliverability of housing sites.</li> </ul>
<b>KEY MESSAGE(S)</b>	<ul style="list-style-type: none"> <li>• Meeting the housing needs of people living in Scotland is the first outcome that the National Planning Framework has to contribute to. Local development plans are also crucial.</li> <li>• The Scottish Government is committed to increasing the supply of new homes – it is crucial that this is taken forward in a way which supports the right housing in the right places not just in terms of numbers, but as an integral part of a place-based approach to planning for housing.</li> <li>• Local Development Plans will produce evidence reports and have a “gatecheck” to resolve disagreements over housing land requirements earlier in the process.</li> <li>• The measures introduced through the Planning (Scotland) Act 2019 together with the existing structures supporting housing delivery will ensure that we are meeting the housing needs of Scotland’s population and providing sufficient land to meet those needs.</li> </ul>
<b>SUGGESTED QUESTION(S)</b>	<ul style="list-style-type: none"> <li>• Are you willing to work constructively with planning authorities in the new system so that local development plans are recognised as a shared plan for a place?</li> </ul>
<b>CONTACT POINT</b>	[REDACTED]

<b>ITEM 3</b>	<b>Infrastructure</b>
<b>ISSUE/ BACKGROUND</b>	<ul style="list-style-type: none"> <li>• Improving the relationship between development planning and infrastructure is a key aim of planning reform.</li> <li>• The new system of development plans, including a stronger NPF4 which aligns with the Infrastructure Investment Plan and STPR2 will help to achieve this.</li> <li>• We are keen for LDPs to be supported by stronger delivery programmes, which benefit from corporate commitment.</li>   <li>• <u>Blindwells</u></li> <li>• Taylor Wimpey may raise issues about their site at Blindwells. This has planning permission in principle for 1600 homes and is being taken forward in partnership with Hargreaves, Bellway, Cruden and East Lothian Council.</li>   <li>• There has been considerable work to address technical issues on the site already but further detailed technical appraisal is required to support the proposal through the next stages of the process.</li>   <li>• Taylor Wimpey are concerned about the costs of a transport appraisal required by the council to reassure them that the development can proceed. East Lothian are looking for this information to reassure themselves that the site is effective and can be allocated. Significant transport interventions are likely to be required including a new rail halt or rail enhancements.</li>   <li>• Taylor Wimpey via East Lothian Council have previously asked for SG funding to support the further technical work required for a new town options report – amounting to £600k. officials considered the request and concluded that they were normal development costs which developers should fund themselves, that SG grant would raise state-aid issues, that there was a lack of clarity around procurement issues and uncertainty about whether HIF criteria would be met.</li>   <li>• HIF remains open to applications but TW would only be eligible for a commercial load, and if due diligence was adequately addressed.</li> </ul>
<b>WHAT THE STAKEHOLDER MAY SAY/ASK</b>	<ul style="list-style-type: none"> <li>• How will planning reforms tackle the infrastructure issues arising for developers?</li> <li>• Could city deal cash be used to support the technical work required?</li> </ul>
<b>KEY MESSAGE(S)</b>	<ul style="list-style-type: none"> <li>• It is crucial that sites allocated in development plans are deliverable.</li> <li>• We would encourage you to continue to engage with ELC.</li> </ul>

<b>SUGGESTED QUESTION(S)</b>	<ul style="list-style-type: none"><li>• Is there scope for further joint working between developers and planning authorities to find solutions to infrastructure requirements?</li></ul>
<b>CONTACT</b>	[REDACTED]

ITEM 4	Fees
<p><b>ISSUE/ BACKGROUND</b></p>	<ul style="list-style-type: none"> <li>• Since 2011 we have reported on the average timescales for determining planning applications. This change was made to show the average length of time it takes to determine an application rather than whether an arbitrary timescale of 2 months or 4 months was met as previously. Latest Statistics are included below.</li> <li>• Planning Authorities also publish a Planning Performance Framework Report on an Annual Basis which we assess against the 15 Key Performance Markers developed by the High Level Group on Planning Performance and feedback is provided to assist improvement.</li> <li>• We have learned a lot through the Planning Performance Framework, however, the time is right to look again at how the performance of the planning system is measured. To this end, discussions have already begun with COSLA, HOPS, SOLACE, SOLAR, RTPI, Homes for Scotland and the Scottish Property Federation to identify the key priorities for planning performance going forward.</li> <li>• We have committed to moving towards full cost recovery, but we also remain clear that increased fee income must be linked to improved performance.</li> <li>• On 18<sup>th</sup> December 2019 we published a consultation on updating the planning performance and fee regimes. The consultation closed on 14<sup>th</sup> February 2020. 109 responses were received and we are currently considering the responses.</li> <li>• Heads of Planning have undertaken 2 research projects to establish the impact of the increase to the maximum planning fee from June 2017 to May 2018 and the costs of determining applications by 12 authorities to assist in updating research undertaken in 2013-14.</li> <li>• These initial discussions will help inform a wider discussion with stakeholders about what a high performing planning system looks like.</li> </ul>
<p><b>WHAT THE STAKEHOLDER MAY SAY/ASK</b></p>	<ul style="list-style-type: none"> <li>• TW recently responded to the consultation on fees, raising the following issues: <ul style="list-style-type: none"> <li>• <i>Concerns about decision making timescales.</i></li> <li>• <i>Applicants should be compensated for delays.</i></li> <li>• <i>Need for authorities to project manage applications.</i></li> <li>• <i>Welcome elected member training.</i></li> <li>• <i>Plans are too restrictive of housing land.</i></li> <li>• <i>High level group should include applicants.</i></li> <li>• <i>Improvement co-ordinator should involve all interests in planning to make a positive impact.</i></li> <li>• <i>Only support fee increases if clear link with performance.</i></li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Do not support charging fees for appeals. If introduced also needs to link with performance and timescales for DPEA.</i></li> </ul>
<b>KEY MESSAGE(S)</b>	<ul style="list-style-type: none"> <li>• Scottish Ministers continue to see an important connection between performance and fees.</li> <li>• We appreciate that it can take longer than the statutory timescale to determine an application, however, there can be legitimate reasons for this and we believe it is essential that applications are subject to the necessary scrutiny and consideration.</li> <li>• It is also important to note that <u>all parties have a role to play</u> in the processing of applications and sometimes the reasons for delay are outwith the control of the Planning Authority.</li> <li>• Research undertaken in 2018 into delays in determining major applications for housing showed that applicants were also responsible for delays through either not providing additional information promptly or the drafting and signing of a legal agreement.</li> <li>• I believe it is vital that the Planning Act leads to a planning system which performs for all stakeholders and helps to deliver the housing, infrastructure and investment that current and future generations need and we need a robust framework to measure the performance of the system in delivering our ambitions.</li> </ul>
<b>SUGGESTED QUESTION(S)</b>	<ul style="list-style-type: none"> <li>• What do you think are the key indicators for measuring the performance of the Planning System?</li> </ul>
<b>CONTACT POINT</b>	[REDACTED]

## ADDITIONAL BACKGROUND INFORMATION

### PLANNING FEES AND PERFORMANCE

#### Taylor Wimpey Response to Planning Fees consultation – summary

##### **Suggested Vision**

*TW suggest the following vision:*

*To successfully manage the development and use of land in the long-term public interest, the planning system must provide certainty, consistency and clarity as to how development and land use will be managed. This is important for all of those who participate in planning or who depend upon its decisions and outcomes. Effective engagement policy, decisions making and communication are essential to ensuring all stakeholders have a voice in how planning operates and an understanding of plans, policies and decisions, and the outcomes being sought.*

##### **Key Performance Indicators**

###### 1. Timely decision making

*The time taken to issue a decision should remain a primary performance indicator. Irrespective of the precise causes of delay in any single application, planning authorities should continue to be responsible for issuing decisions as quickly as possible. Unlike our counterparts in other parts of the UK, applicants in Scotland do not benefit from a “planning guarantee”. Nor do we have access to the full range remedies for extended delays – such as England’s provision for repayment of planning fees after 26 weeks . The only choice we can make is to appeal against non-determination – which in practice worsens the uncertainty over when a decision will be made.*

*We were very disappointed that the recent reform of primary legislation did not give Scottish applicants equivalent rights to recover fees as are enjoyed by their English counterparts. This is just one of many strong provisions in place to address applicant needs in England. An amendment of this nature was tabled by Graham Simpson MSP during stage 2 of the Planning (Scotland) Bill, but it was rejected by the other parties.*

*We think the Scottish Government should give careful thought to what new options it can make available to Scottish applicants in instances where they experience unacceptable delays in receiving a planning decision. This should be an early area of consideration for the National Planning Improvement Coordinator. Delays in determining applications can have a ruinous effect on our business and the existing monitoring of decision-time performance is inadequate and un-inclusive.*

*The number of major applications requiring to be determined has been falling for 5 years. Despite this, the average decision-making time is still double the statutory time period – even with increasing use of the Stop-the-Clock protocol and an increase in the use of processing agreements.*

## 2. Use of Processing Agreements

*Performance can also be judged on the use of a processing agreement to project manage planning decisions from pre-app through to negotiation of developer obligations. This approach can improve efficiency and transparency from the start to the end of the development management process. Planning case officers need to be good project managers, understanding what needs to happen when to be able to make a planning decision by an agreed date, and using that knowledge to coordinate and galvanise their colleagues and consultees. Passive approaches to service are not acceptable and will be even less supportable if fees increase again.*

## 3. Applicant Satisfaction

*Qualitative measures of customer (applicant) satisfaction are important given the increasing reliance on planning fee payers to subsidise or fully-fund frontline planning services. Some authorities already send questionnaires to applicants upon conclusion of the application. This could be standardized and the results published. It could contain several questions rating the process rather than the result, such as:*

- 1. Project management of the application and consultees*
- 2. Communication (including responsiveness to questions and information)*
- 3. Validation*
- 4. Speed of response from consultees*

## 4. Elected Members: Training and Decision-Making

*We welcome the provisions in the new Planning Act for the training of elected members. One way to gauge the impact of member training could be to monitor any reduction in the number of decisions that are taken against officer recommendations – or in the number of refusals being overturned on appeal.*

## 5. Effective Housing Land / Delivery of New Homes

*The restrictions put in place through development plans and the wider planning system have a direct impact on the land options that are available for home building. Plans identify the land that the planning authority believes should be used for home building, taking into account a range of considerations. We can only build homes on that land if we can access it at an appropriate price and build and sell homes at costs and prices that result in a profit. Not all of the land identified in plans provides a genuine commercial opportunity that makes home building through the market a realistic option. The supply of effective housing land in Scotland is therefore lower than it may appear when looking at development plans and housing land audits. Despite this, many of Scotland's planning authorities judge themselves to be maintaining a five-year effective housing land supply.*

### **High level Group**

*The High Level Group on Planning Performance does not embrace representatives of key planning applicant groups and planning fee payers, such as the home building industry. The group needs more balance if it is to play an effective role in achieving an outcome-focused approach to performance, and if it is to provide those who fund planning services with an appropriate opportunity to discuss their experiences, needs and perspectives.*

### **National Planning improvement Co-ordinator**

*Engagement with key planning delivery partners – including home builders – should be an early priority for the National Planning Improvement Co-ordinator. Home builders*

*in Scotland do not recognize the picture that is painted of improving services as, in practice, they find it harder than ever to secure a planning decision. The appointment of a National Planning Improvement Co-ordinator has great potential to make a positive impact on performance and on the achievement of better outcomes through planning. Significant improvements could be made by identifying and sharing best practice in terms of both efficiency and quality of decision making. However, to maximise the impact of the new coordinator, it will be vital for them to have a balanced and informed perspective on the planning system, and current performance, including from the user's perspective. The current forum for performance discussions – the High-Level Group on Planning Performance – is not conducive to this. In the age of collaboration, the house building industry should not be excluded from that group.*

### **Category 1 – Residential Development**

*We can only support fee increases where there is a clear pathway to fully compensating paying applicants with rapid and sustained improvements in service. We support the principle of increasing resources for planning resources, but we can only give outright support to higher fees if the specific proposals are clear, justified and where there is a clear path in place to achieve demonstrable and corresponding service improvements for applicants.*

*It is essential that the increases to application/service fees have a direct relationship to funding for planning departments in Scotland. We believe that, fundamentally, it is essential that local authority planning departments should have the option to ring-fence any funding received from planning services. An overall increase in major development through-put for the planning department should increase income and support better trained and better staffed planning departments. Whether this results in a high-performing planning system is yet to be seen, however we believe that faster decisions and greater volume of consents should bring an overall benefit to the performance of local authority planning departments.*

*If implemented, the new fees would make applications fees for most applications significantly in excess of what they are currently and more expensive than equivalent applications in England with precious little detail on how performance will be improved. From our perspective it is very difficult to justify a further increase in fees which are non-ringfenced for development management services and which cannot be linked to any clear and measurable performance improvement commitments or achievements. The proposed fee schedule would double some existing fees. Some applications will become two times as expensive as an equivalent application in England. The justification for such radical fee changes is unclear. The proposals send the wrong message to would-be and current investors in home building in Scotland.*

*We are open to the principle of reviewing and potentially increasing fees when it can be clearly justified. However, the current consultation appears somewhat one sided, with steep increases in planning fees proposed on the one hand and somewhat limited information on performance.*

*A clear commitment to the reinvestment of planning fee income into core planning services would be a fair and reasonable response to our in-principle support for higher fees. Furthermore, any additional investment by paying applicants should be matched*

*by increased public sector investment, and rewarded with a place at the table when planning performance is discussed.*

*Taylor Wimpey objected to the previous increase in fees in 2017 as no performance measures were included. The impact of these fee increases is unclear and the information available is limited. Only a third of the additional fee income was reinvested in planning services – but it isn't at all clear how that reinvestment improved the services being provided to those paying the fees. The proposed fee increases before us now are more far-reaching, and will add significantly to the costs for applicants, but little information has been provided to explain how they will improve decision times and other aspects of performance that are important to those paying the fees. We are willing to consider the merits of fee increases but would expect more information to explain the justification for what is proposed and more information on the current costs involved with processing applications. Before specific fee increases are considered, we are clear that there needs to be a wider conversation, informed by evidence on what the priorities and principles should be for new funding.*

### **Charging for Appeals**

*We do not support the principle of fees for planning appeals. Planning appeals are already hugely costly, and too often that cost occurs because we are forced into an appeal situation by virtue of an unreasonable first-instance decision. The planning system intervenes in the decisions people seek to make about what they do with their land. The decisions made by local councillors and planning teams can have major financial implications for families and businesses, and for Scotland's wider ability to secure the development and land use changes that are needed to benefit the public at-large in the long term.*

*Those on the receiving end of a refusal of planning permission, or who receive no decision after a given period of time, should retain their access to a fee-free independent review.*

*Anecdotal evidence from home builders that operate in both Scotland and England suggests the predictability of the outcome of an appeal in Scotland is much lower. We also hear strong evidence to suggest refusals against officer advice are increasing, with a corresponding increase in success rates at both appeal and award of costs applications - in such cases.*

*In some circumstances a planning appeal proves the only way to secure consent for a perfectly sustainable development – even ones which are allocated. Were fees to be introduced, measures would need to be put in place to achieve better performance in timely DPEA/Ministerial decision making, and to give applicants some meaningful options in the event that timely decisions are not forthcoming.*

## **Planning Fees - Top Lines**

- **The recent consultation on updating the planning performance and fee regime was a key action identified in our work programme which was published in September 2019.**
- **The consultation was published on 18<sup>th</sup> December and closed on 14<sup>th</sup> February. 109 responses were received and we are currently considering the responses.**
- **Scottish Ministers remain committed to the principle that any increases to planning fees must be linked to improved performance.**

## **Consultation paper**

This consultation paper proposed and sought views on:

- a new approach to how the performance of planning authorities is measured;
- the role of the National Planning Improvement Co-ordinator;
- a new structure for the planning fee regime;
- the introduction of additional services which authorities can charge for;
- the ability to waive or reduce planning fees in certain circumstances;
- the introduction of a fee for applying for listed building consent;
- the introduction of an Enhanced Project Managed Application process; and
- charging for appealing a planning decision.

The paper proposed increasing fees or changing the way that the fee is calculated in most circumstances. The key changes are highlighted below.

- Increase the maximum planning fee to £150,000 (from £125,000) in most cases
- For residential applications, cost per individual house will increase to £600 for the first 10 units, £450 per unit 11-49 units and £250 per unit up to the maximum of £150,000 – previously £401 per unit 1-49 houses, £200 per unit thereafter up to £125,000.
- Seeks views on the types of additional services which an authority can charge for and the circumstances where an authority could waive or reduce the planning fee.
- Seeks views on the introduction of fees for appealing planning decisions.

## **Background Resources**

- Research conducted by the RTPI indicates that there has been significant reductions in planning authority budgets and staffing during the past decade.
- Heads of Planning Scotland research into costing the planning service in Scotland showed that in relation to fee income that the fees collected do not meet the costs of determining applications (65.6%)
- Heads of Planning Scotland research into the impact in the first 12 months of the increase of the maximum planning fee to £125,000 in 2017 showed that:
  - £4,218,242 additional fee income was generated across Scotland
  - Varying impact across Scotland
  - 10 councils reinvested uplift income totalling £1,412,018. (33% of overall uplift)

## **Q&A**

**Q: Why are you consulting on fees now?**

**A:** The current Planning Fee Structure is over 25 years old and doesn't reflect the scale and nature of developments now coming forward. We are also conscious that planning authorities are under increasing financial pressure and have seen significant cuts to budgets and staff resources over recent years. We believe the planning system needs to be appropriately resourced to deliver on our ambitions.

**Q: Fees in some cases have increased substantially, how can that be justified?**

**A:** In most circumstances planning fees have increased. Research has shown that planning fees only cover 63% of the cost of determining the application therefore the proposed changes seek to redress that. The proposed figures have been published to help generate discussion. However, we will need to carefully balance increasing resources for Planning Authorities with ensuring that Scotland remains an attractive place to invest and do business.

**Q: Why are you consulting on charging for appeals?**

**A:** We have previously consulted on charging for appeals in 2016 which showed there was broad support from Civic Society, however, following the discussions during the passage of the Planning Act about rights of appeal and resourcing of public services we consider that is an appropriate time to take another look at this.

**Planning Performance Statistics - Housing**

Year	Major		Local	
	Total Applications	Average timescale	Total Applications	Average timescale
2013/14	147	69.9	5,762	15.2
2018/19	98	35.1	4648	12.3

**Legal Agreements – All Applications**

Year	Total Number of Applications	Average Time
2018/19	404	36.7

**Processing agreements – All Applications**

Year	Total	Success
2018/19	2,716	75.3%

**Approval Rate – All Applications**

2018/19	35,396	93.7%
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## Review of Permitted Development Rights

- Granted by the Town and Country Planning (General Permitted Development (Scotland) Order 1992 (as amended), these allow development without the need to apply for planning permission.
- A Sustainability Appraisal of options for 16 development types has been published, together with a proposed programme for reviewing and delivering changes to the Order.
- Early elements of the programme will include considering of changes that help to address climate change, any changes in relation to hill tracks, measures to support digital connectivity and to support the delivery of affordable homes in rural areas.

## Land Value Capture

- Following the report by the Scottish Land Commission, we will continue to consider how we can more effectively make use of land value uplift for public benefit.
- This will include taking stock of existing mechanisms such of planning obligations, before considering new mechanisms such as the infrastructure levy or changes to compulsory purchase.
- We intend to bring forward a package of proposals to address how planning authorities can assemble land, tackle problem properties and capture land value uplifts for consideration by the next administration.

## Digital planning

- We want digital solutions to be at the heart of reforms to how planning operates.
- Our digital planning programme is working towards responsive national mapping, stronger use of data and better access to planning information for all.
- This will help to create a digital planning service which is flexible, responsive and ready to embrace future change.
- We will set out our priorities in a Digital Strategy for Planning.

## Place

- The aim of our planning reforms must be to create great places for all.
- We will continue to promote place by implementing the Place Principle, to support the creation of sustainable places and transforming outcomes for communities.
- We will also continue to provide support for the Place Standard tool, which helps communities to consider the physical and social elements of a place and identify priorities for change.

## Original correspondence



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Kevin Stewart MSP  
Minister for Local Government, Housing and Planning  
The Scottish Government,  
St. Andrew's House  
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11 December 2019

Dear Mr Stewart MSP,

**Taylor Wimpey - SNP Conference Dinner 2019**

I am writing to thank you for your time and conversation at the SNP Conference dinner in October. The dinner was very enjoyable, and it was good to see the Party engaging with businesses delivering sustainable and inclusive economic growth across many sectors.

### **Taylor Wimpey**

To give you some background, Taylor Wimpey is one of the UK's largest residential developers, building around 15,000 new homes each year. We operate from 24 regional offices, two of which are in Scotland, allowing us to work as a local builder supporting a wide variety of careers, apprenticeships, and further training opportunities, ensuring that we (and our supply chain) are among the most attractive employers in the country. Our East Scotland office is situated in Dunfermline and oversees the investment and development operations of our East of Scotland portfolio and our West Scotland office in Paisley overseeing investment and development operations in the West of Scotland. Together, we operate in over 75% of Scottish local authority areas.

As a company, we focus on building attractive, high-quality properties ranging from one-bedroom apartments to five-bedroom family homes. Our homes are attractive to a range of buyers, such as first-time buyers, growing families, upsizers and downsizers. We are a HBF 5 Star Builder and over 90% of our customers would recommend us to friends or family.

At Taylor Wimpey we don't just build houses, we build vibrant, sustainable communities which can bring long-term economic and social benefits to established towns and villages. Where necessary, we provide, support and contribute infrastructure improvements including primary and secondary schools, roads and utilities, green spaces and community facilities. Our investment creates and sustains employment and training opportunities whilst bringing an opportunity to improve local facilities and support local projects and initiatives.

## Scotland's Planning System

Tackling Scotland's housing need will require the Government, local authorities and private developers to work together to face up to industry challenges and find solutions. We are more than willing to collaborate and achieve these goals.

I would like to congratulate you on the work you've undertaken on the Planning Bill - now Planning (Scotland) Act 2019. We were initially concerned about some of the proposed amendments regarding Third Party Rights of Appeal and greenbelt but were pleased that consensus was able to be reached at Stage 3 of the Bill. We are keen to work with you and the Scottish Government to ensure that the Act and programme of work announced recently can deliver a Planning system that works well in practice.

Our primary focus in Scotland is East to West across the central belt. We are committed to developing in Scotland and would like to work with the Scottish Government to achieve this. One factor we believe would assist this is if the Scottish Government are able to set out clearer and more ambitious house building targets. Our communities provide a variety of tenures that are attractive to prospective homeowners and we believe if we build the right blend of tenures based on need and financial affordability in an area, it will allow people to remain in their communities, retain connections or move to the area of their choice to suit work and family.

## New-Build Homes (Buyer Protection) (Scotland) Bill

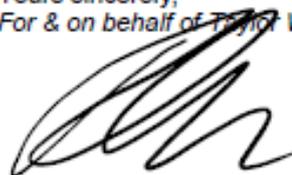
I would like to take this opportunity to highlight my awareness of the proposed New-Build Homes (Buyer Protection) (Scotland) Bill brought forward by Graham Simpson MSP. As a member of Homes for Scotland and Vice Chair of its East Central Scotland Committee, I have been regularly engaged in dialogue relating to its potential impact on the industry. As a HBF 5 Star Builder we place build quality and customer experience at the heart of what we do and are signed up to Homes for Scotland's common consumer code for house builders.

## Next Steps

I would welcome the opportunity to discuss the house building sector and planning legislation in more detail. To arrange a meeting please contact my colleague :

[REDACTED]

Yours sincerely,  
*For & on behalf of Taylor Wimpey UK*



**Richard Holland BSc (Hons) MRTPI**  
Regional Director | Strategic Land & Planning Scotland  
Taylor Wimpey

[REDACTED]

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Meeting – Proposed Development at Helensburgh Golf Club  
30<sup>th</sup> October 2019 – 2.00pm Civic Centre, Helensburgh  
Meeting Note

Present:

Gregor Cameron – Dunbritton HA

[REDACTED] – Argyll and Bute Council - Roads

[REDACTED] – Argyll and Bute Council - Planning

[REDACTED] – Argyll and Bute Council - Strategic Planning

[REDACTED] – Scottish Government More Homes Division

[REDACTED] – Montagu Evans (HGC Agents)

[REDACTED] - Montagu Evans (HGC Agents)

[REDACTED] – Helensburgh Golf Club

[REDACTED] – Helensburgh Golf Club

[REDACTED] – Argyll and Bute Council - Housing Investment

[REDACTED] – Argyll and Bute Council - Housing Investment

[REDACTED] – Taylor Wimpey

[REDACTED] – Scottish Water

Background to Project:

JL gave a background to how the project was established, which included the need for the club to:

- Modernise to attract younger members, extend playing life membership and have a course and club house that will attract more users and increase economic benefit to the area. □ Introduce a youth academy.
- Keep the club affordable to the community now and in the future, whilst ensuring that income can be made to safeguard its future.
- DHA and TW became involved in the project to enable the delivery of the housing element of the development proposals (affordable and private).

Affordable Housing:

- DHA intend to deliver the affordable housing element of the development to meet housing need in the area.
- The proposed development is part of current Council SHIP. This is currently highlighted as 76 units.
- DHA acquired the 18T site from HGC. This site has not been developed yet in case it is required to enable the larger site delivery. The site was acquired based on 16 units, all for affordable rent.
- AB advised that if the Council and Government did not see some substantial progress with the development then the funding being allocated towards the affordable housing element could not be guaranteed. This was reinforced by SD.

Project Proposals:

CP outlined the main elements of the project proposals:

- Redevelopment of the Club House and 3 new holes to the east of the development land. This would free up land for housing development.
- Development of 300 housing units on the land allocated in the current LDP, to include private and affordable housing.
- Development of the 18T site owned by DHA for affordable housing.

- The overall development to come forward in one planning application.

#### Project Timeline:

CP gave an overview of the timescales for the project to try and achieve an actual site start:

- PAN issued – agreement on all pre-application documentation/surveys/reports – Jan 2020.
- Planning Application issued June 2020.
- Seek approvals (planning, RCC and other necessary consents) and resolve section 75 agreements June 2020 – March 2021. JR period needs to be considered for 3 months following S75 agreement being issued. This may push end date out by 3 months.
- Commence construction of new golf course holes towards end of 2021.
- Commence construction of housing towards end of 2022.
- TW would want to do more detailed community engagement during the PAN period. This would include engagement with the Community Council.

#### Work to Date:

- Topographical surveys and site investigation.
- Site meetings and detailed discussion between STRI and SNH – moorland area to be used for new golf course holes.
- Traffic assessment (TA).
- Detailed design for golf course and concept design for club house.

#### Planning Comments:

- Pre-application response has been issued back to HGC.
- Any future application will require to be competent given its scale to allow full consideration.
- Pedestrian access from the Old Luss Road needs to be carefully integrated into any development proposals to ensure continuity with the John Muir Way.
- High level and quality of landscaping will be required with potential access to TPO 30 woodland (east of site) included. This will maximise informal recreation areas.
- Information on programme and phasing will be required at an early stage.
- Planning application and RCC can be lodged at same time.
- Density above the LDP requirement can be considered up to 10%.
- Overall plan of final unit numbers for any planning application to be reviewed taking into consideration LDP site, 18T and existing site of club house in settlement zone. This will give a better understanding of final unit numbers and level of affordable houses required in line with planning policy.

#### Road Comments

- Only 300 units can be accessed from one point of access. This is what current TA is based upon. More than 300 units will require 2 points of access.
- Current TA needs to be revised to include all proposed housing plus HGC proposals of expansion re the course, club house and golf academy (employees, deliveries etc).
- Some areas for access into site from Abercromby Crescent may not be adopted by Council.

#### Scottish Water:

- LJ confirmed that the area for development was detailed within the LDP and SHIP.
- Initial work undertaken shows water mains will have capacity.

- A study is currently being compiled re waste-water treatment and should be available by end of November 2019. This will identify if treatment works and networks have capacity and, if not, what upgrade works will be required.
- In any future planning application careful consideration and full details will need to be included to address flooding concerns and show how surface water will be discharged from the site to a water course.

#### Project Stakeholders and Future Strategic Meetings:

- It was agreed to consider having a strategic meeting group and an operational working group. This is to be discussed with the Council.
- Future parties to attend operational working group could include SEPA and SNH.
- Programme of meetings to be held every 6 weeks to assist in project delivery.

#### Actions from Meeting:

1. Confirmation when 18T purchased and valuation basis for site issued to ML – Action GC
2. Overall plan for scheme proposals along with project timeline to be issued to give an understanding of final housing numbers. This should include 18T site, LDP site, extension of golf course and redevelopment of land in settlement that the club house is currently located on – Action JL and CP
3. Affordable housing allocation to be reviewed once information from action point 1 is available – Action GC and ML
4. Planning and developer to meet to discuss scope of work and content required for planning applications – Action DM and CP
5. TA to be reviewed to incorporate all development proposals in the area and issued to Roads – Action CP
6. Scottish Water to complete surveys into capacity and any upgrades necessary to accommodate proposed development by end of November 2019 – Action LJ
7. Discussion with [REDACTED] in relation to structure of future Strategic Project Meeting – Action GC

**Meeting – Proposed Development at Helensburgh Golf Club  
12th December 2019 – 2.00pm Civic Centre, Helensburgh  
Meeting Note**

**Present:**

Gregor Cameron – Dunbritton HA  
[REDACTED] – Argyll and Bute Council – Housing Investment  
[REDACTED] – Argyll and Bute Council – Roads  
[REDACTED] – Montagu Evans (HGC Agents)  
[REDACTED] – Montagu Evans (HGC Agents)  
[REDACTED] – Helensburgh Golf Club  
[REDACTED] – Helensburgh Golf Club  
[REDACTED] – Taylor Wimpey  
[REDACTED] – Taylor Wimpey  
[REDACTED] – Taylor Wimpey  
[REDACTED] – Scottish Water  
[REDACTED] – NHS OT

**Apologies:**

[REDACTED] – Argyll and Bute Council  
[REDACTED] – Argyll and Bute Council – Planning  
[REDACTED] – Argyll and Bute Council – Planning  
[REDACTED] – Argyll and Bute Council – Strategic Planning  
[REDACTED] – Scottish Government More Homes Division  
[REDACTED] – Argyll and Bute Council – Housing Investment  
[REDACTED] – Argyll and Bute Council – Housing Investment  
[REDACTED] – Taylor Wimpey

**Update, Design, Site Layout and Phasing:**

TW had not prepared the plan actioned at the last meeting. They issued a copy of the Concept Layout (May 2019) to give information to other members in relation to overall development proposals. TW asked to produce the plan agreed at the last meeting in line with the outstanding action.

***Action*** *Issue overall plan for scheme proposals along with project timeline to give understanding of final housing numbers. This should include 18T site, LDP site, extension to golf course and the redevelopment of land in settlement the club house is currently located on – TW and HGC*

**Planning:**

No meeting has been held with planning. TW advised they will target this for start of Jan 2020.

***Action*** *Planner and developer to meet to discuss scope of work and content required for planning applications – TW and DM*

**Roads:**

TW have commissioned the revised TA requested at the previous meeting. This should be available start of January 2020 and issued to roads.

***Action*** *Issue revised TA to roads early January 2020 – TW*

Roads made it clear at meeting that 300 units was the cut off for requirement for secondary access.

**Action** *Review to be undertaken between GC and TW in relation to what scale of access could be achieved through DHA 18T site. Roads stated that 5.5m road with verges/footpath would be required –*  
**GC and TW**

### **Scottish Water**

Foul System – capacity study to be completed by Jan/Feb 2020. This will ascertain what capacity is in the system and any associated works required to upgrade the system to serve the development. Current work is highlighting potential of current system being at capacity. Upgrade work will highlight what the developer will be responsible for and what SW will be responsible for. It is important that the works required by SW are detailed with associated timescale for then being delivered.

**Action** *Foul System capacity study completed by Jan/Feb 2020 with timescale for works required. – LJ*

Water Supply – No formal DIA had been lodged by TW. SW undertaking strategic impact assessment on system, which should highlight any concerns and how they can be overcome. This comfort is required prior to any formal testing being undertaken by the developer.

**Action** *Water supply strategic impact assessment. – LJ*

### **Other Statutory Bodies**

TW have commissioned a flood risk assessment for the site. No further work has been done with other statutory bodies.

### **Project Timeline:**

- PAN issued end of Jan 2020 – Agreement on all pre-application documentation/surveys/reports Jan 2020.
- Planning Application issued June 2020.
- Seek approvals (Planning, RCC and other necessary consents) and resolve section 75 agreements June 2020 - March 2021. JR period needs to be considered for 3 months following S75 agreement being issued. This may push end date out by 3 months.
- Commence construction of new golf course holes towards end 2021.
- Commence construction of housing towards end 2022.

Confirmation required on details in relation to any section 75 notices placed on the development. It is hoped that given DHA involvement there will be no section 75 for delivery of affordable housing that could delay matters.

### **Affordable Housing**

GC reiterated pressure on DHA to deliver some form of affordable housing for the area and try to utilise 18T site in the meantime. With this aim DHA has started the procurement process to appoint a design team for the site.

Confirmation is required as soon as possible if a second access will be needed through the site, as this will impact on any future development proposals.

**Community Consultation**

No formal consultation has commenced, although the Golf Club have been approached by the Community Council for an update and are keeping lines of communication open.

**Strategic Meeting**

The intention is to have another meeting in the same format as currently, then to review whether strategic meetings required.

**Action** *Important that actions set are met for next meetings to allow the development to progress – **ALL***

**Date of Next Meeting: 31st January 2020 – 10am, Helensburgh (venue to be confirmed)**