



Guidance on Key Agency Engagement with Local Development Plan Site Appraisals

Purpose

The key agencies recognise our duty to cooperate with planning authorities in the preparation of the Proposed Plan including the site appraisal process.

This guidance sets out high level principles aimed at getting the best out of the key agencies in supporting the site appraisal process. The principles facilitate timely and effective responses that add most value to the local development plan preparation process and ultimately support the smooth delivery of sites. They are framed around where and how key agencies are best involved in the process.

Some key agencies will provide more detailed supplementary advice or guidance on their approach as it relates to their areas of interest.

Maximising value from the key agencies

Development plan teams can use the wealth of information gathered for the Evidence Report to undertake an initial site appraisal that sifts out unviable sites including those that don't align with national policy and the spatial strategy principles or vision. This can be usefully linked with the site assessment undertaken as part of Strategic Environmental Appraisal (SEA) process as advised in paragraph 153 of the [Scottish Government's Local Development Plan Guidance](#).

Following the initial sifting process key agencies should be consulted on sites that:

- are preferred or a reasonable alternative and align with your spatial strategy and associated infrastructure first approach; and,
- relate to issues or opportunities that fall within the remit of the relevant key agency where further bespoke advice is required to support delivery. Some agencies may want to review all the preferred and alternative sites due to potential cumulative effects and will advise the planning authority accordingly.

The above approach enables us to focus our resources on sites where we can add most value. We recognise that there may be a desire to seek input to all sites raised through a call for sites but this would lead to significant delays and less robust responses due to the resources available.

There may be exceptional circumstances at a later stage in the plan preparation process, where the exclusion of a site is being challenged by third party, and you consider that input from a key agency would be useful. In such circumstances we may be able to provide a view on the site at this stage if the reason for the consultation is clearly outlined including why the view of the agency is considered necessary.

Consulting the Key Agencies

To help us use our time most effectively, sites submitted to a key agency should be:

- supported by a summary of the reason for requesting key agency input;
- grouped in one batch - repeated individual requests undermine the advice provided and may not enable agencies to provide robust advice on cumulative impacts;
- supplied with a GIS shapefile;
- accompanied by the initial site assessment findings (and indicative or draft SEA site assessment findings for Consultation Authorities); and,
- presented in an easy to understand and clear format e.g. preferred/alternative sites and different site use classes could be colour coded and/or clearly categorised.

A minimum consultation period of six weeks is requested, however more time may be required depending on the number and complexity of the sites involved. If more time is needed the key agency will contact the planning authority as soon as possible to agree a suitable extension. We will not be able to respond on site appraisal consultation requests in less than six weeks and this should be factored into work programmes.

Key Agency response

For sites where there are likely to be significant effects and it is considered that specific mitigation would be required, the key agency will indicate whether we:

- are content with the allocation in principle, subject to mitigation measures as per the mitigation hierarchy (e.g. alteration of the allocation boundary or specific requirements to be included in place briefs/ delivery programme);
- consider that further information from an appropriate appraisal is needed including where the appraisal fails to include sufficient consideration of how, when and by whom any mitigation is delivered; or,
- recommend that the allocation should be removed or altered, because adequate mitigation is not possible.

Where we are content that the potential impact of a site can be mitigated at the development management stage, we may not provide specific comment. An exception could be where there are key considerations to support deliverability that are important to convey to the planning authority.

For SEA Consultation Authorities our SEA comments will focus on inadequacies or inconsistencies in the environmental assessment as well as supporting findings where we are in agreement.

Historic Environment Scotland
NatureScot
Scottish Enterprise
Scottish Environment Protection Agency
Scottish Water
Sport Scotland
Strathclyde Partnership for Transport
Transport Scotland