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# SUPPLEMENTARY PLANNING DOCUMENT 1

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## Open Space, Sport and Recreation Provision in New Housing Development

*ADOPTION – JUNE 2015*



## STATEMENT OF CONSULTATION

JUNE 2015

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## 1.0 - INTRODUCTION

- 1.1 This statement supports the adopted Supplementary Planning Document 1 (SPD1) and has been prepared in order to meet the requirements of the Town and Country Planning Regulations 2012. Regulation 12 (a) requires that before a local authority adopts a Supplementary Planning Document (SPD) a statement must be prepared setting out:
- The persons the local authority consulted when preparing the SPD;
  - A summary of the main issues raised by those persons; and
  - How those issues have been addressed in the SPD.
- 1.2 This statement details the internal consultation undertaken during the production of the SPD prior to formal consultation, the representations made during the February-March 2015 consultation period and sets out how the Council has taken on board the comments made in the SPD to be adopted.

## 2.0 - CONSULTATION UNDERTAKEN

- 2.1 SPD1 has been subject to a 4-week consultation period which took place from 20 February 2015 and 20 March 2015.
- 2.2 The Council considers that the requirements of the Council's Statement of Community Involvement and Regulation 12 of the Town and Country Planning Regulations 2012 were met for the public consultation. More details are provided below.

### Internal consultation (December 2014/January 2015)

- 2.3 Officers from Planning Policy and Projects have worked closely with colleagues from Development Management, Leisure Services and Legal Services in preparing the revised draft version. The main issues that were raised through internal consultation and the changes that have been made to the document as a result, are outlined below.

Issue	Council Response
Move advice on making an appointment with a case officer to 'Pre-text' section.	Change made.
Make reference in the 'Pre-text' section to pre-application charging and include details of the website where applicants can find out more.	Information added.
Refer to the six typologies of open space, sport and recreation from the Greenspace Audit and Strategy within the Introduction.	Information added.
Form a new 'Context' section to set out the recent changes to Regulations and guidance which have influenced the approach taken in the SPD.	Information added.
Add in references to the priority order of the SPD to seek off-site contributions as a matter of principle.	Information added.

Issue	Council Response
Outline that on-site provision will only be considered in exceptional circumstances such as where provision would aid requirements for sustainable drainage systems.	Change made.
Add in further advice on viability and include a supporting appendix which sets out the information expected from applicants when completing a Viability Appraisal.	Information added.

**Screening consultation with statutory bodies**

2.4 A Screening Statement, to determine whether a Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA) and an Equality Impact Assessment (EIA) would be required for the draft SPD was sent to the statutory consultees on Wednesday 14<sup>th</sup> January 2015. Responses were received from English Heritage and Natural England, both of whom agreed with the Council that the above assessments would not be required to accompany the SPD.

**Public consultation**

2.5 The following documents were made available at the Planning Reception, Bury Town Hall and selected public libraries during normal opening hours and on the Council’s website between Friday 20<sup>th</sup> February 2015 and Friday 20<sup>th</sup> March 2015:

- Draft SPD1
- SEA Statement
- Consultation Statement
- SPD matters

2.6 Letters and emails were sent out to statutory consultees (Natural England, Environment Agency, English Heritage) and to those consultees on the Council’s consultation database that were considered appropriate.

2.7 The Council’s Planning Services social media accounts on Twitter and Facebook were also used to post campaign ‘tweets’ and posts which helped to raise awareness of the document and how they could read it and make comments.

## 3.0 – RESPONSES TO REPRESENTATIONS

- 3.1 A total of 10 formal representations were made on the Consultation Draft of SPD1. Table 1 shows details of the respondents.

**Table 1: Consultation Draft respondents**

Name	Organisation
Sarah Stansfield	Oldham Council
David Holland	Arcon Housing Association
Gillian Laybourn	English Heritage
Janet Baguley	Natural England
Joanne Miles	Department of Health
Andy Frost	Frost Planning on behalf of Chandos Remediation and The Brickworks (Bury) Ltd
Andy Frost	Frost Planning on behalf of Bellway Homes
Paul Daly	Sport England
Alan Hubbard	National Trust
Simon Artiss	Barratt Homes

- 3.2 All comments received on the Consultation Draft of SPD1 were considered and amendments and revisions were made where considered appropriate. Appendix 1 details the individual representations made. There was general support for the SPD and its content with some suggested minor amendments to the wording, a number of which have been incorporated within the final document. Table 2 below provides a summary of the issues raised and the Council's response to them:

**Table 2: What main issues were raised and how were they addressed?**

Key issues	Council's response
Include reference to spending on safe and secure access to open spaces as possible improvements, especially for children.	Comments noted, agree with this change.
The residual land value methodology needs to be tested against relevant benchmarks to establish a market acceptable level of return for the developer and landowner. Any viability appraisals should accord with the NPPF and RICS guidance.	Comments noted. There is no agreed approach towards assessing viability and the use of assumptions, however the Council have prepared the methodology using all relevant guidance available.
The Council's assessment of needs for open space, sport and recreation does not fully comply with the NPPF as the Playing Pitch Strategy is out-of-date and the evidence uses standards which is not in line with up-to-date guidance from Sport England.	Comments noted, no change required. The evidence was prepared using the most up-to-date guidance available at the time of the audit and future reviews will take account of new guidance.
Suggestion of using performance quality standards for playing pitches.	Comments noted, agree with this change.

Key issues	Council's response
Lack of clarity on how the SPD will secure contributions towards new green infrastructure, for both Council-owned and private sites, given the focus on existing provision.	Comments noted, no change required. The Council recently updated the Greenspace Strategy and this was published in February 2015. Due to increasing pressure on Council budgets, priorities have shifted towards alleviating the most significant quantitative deficiencies and on improving those sites with urgent need for investment.
Information from the Greenspace Audit and Strategy on quantity and quality should be incorporated within the SPD.	Comments noted, no change required. Information from the Greenspace Audit and Strategy was not included within the document in the interest of brevity. The evidence is referred to within the SPD and is available on the Council's website.
The sums in Appendix 2 have not been viability-tested.	Comments noted, no change required. Development viability is tested on a site-by-site basis using viability appraisal when an application is submitted to the Council. Section 4 and Appendix 3 of the SPD provide further information to guide this process.

**Further changes made post-consultation**

- 3.3 The following changes have been made to SPD1 following the public consultation and prior to adoption:

**Table 3: Post-consultation changes**

Change	Commentary
Section 4: Added new footnote 7 to highlight that contributions may be directed towards improving accessibility to an open space.	In response to the representation from ARCON.
Section 4: Added reference to Sport England's Performance Quality Standards when assessing the quality of playing pitches.	In response to the representation from Sport England.
Appendix 2: Figures for 1-9 units added.	To aid with scenarios where a development of 10 dwellings or above contains less than 10 units of a particular house type.

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# APPENDIX 1

## REPRESENTATIONS RECEIVED

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This report sets out the comments received as representations during the consultation in February / March 2015 on the revised SPD1.

**REF NO: 400**

**ARCON HOUSING ASSOCIATION LTD**

**Representation:**

Thanks for letting us read and comment on the consultation document. The document is very comprehensive and something that this organisation fully supports. The only comment I would add is that we would like to see included in the spend of the contributions is that in addition to spending on open space, sport and recreation facilities it also includes for safe and secure access to such facilities especially for children. For example there may be a park close to a new development but is across a busy road so some form of safe access, say via a bridge, should also be in the range of possible improvements.

**REF NO: 626**

**Historic England**

**Representation:**

Draft SPD1: Open Space, Sport and Recreation Provision in New Housing Development SPD

Thank you for consulting English Heritage on the above document. At this stage we have no comments to make on its content.

Draft SPD1: Open Space, Sport and Recreation Provision in New housing Development Screening Statement

Thank you for your email dated 20th February 2015 regarding the proposed SEA Screening statement.

In terms of our area of interest, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing policies which have already been subject to a Sustainability Appraisal. As a result, we would endorse the conclusions that it is not necessary to undertake a Strategic Environmental Assessment of the document.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

**REF NO: 640**

**SPORT ENGLAND**

**Representation:**

Thank you for consulting Sport England on the above.

The need to update the existing SPD is recognised given that it supports an UDP that was adopted in 1997, and since that time national planning policy and legislation has continued to evolve. It is also recognised that an SPD can only expand upon / support existing development plan policy. As a result, the scope and extent of amendments to the SPD is somewhat restricted.

Our comments follow:

#### Paragraph 1.3

Sport England supports the content of this paragraph.

#### Paragraph 2.2

This paragraph correctly states that para 73 of the NPPF requires councils to undertake robust and up-to-date assessments of the needs for open space, sport and recreation facilities and opportunities for new provision. However, we would not agree that the Council's assessment for Bury fully complies with paragraph 73. Sport England has developed guidance on assessing needs and opportunities for indoor and outdoor sports facilities to support the NPPF and this is referenced by National Planning Practice Guidance.

It is recognised that Bury's most recent work on open space, sport and recreation commenced prior to the publication of the Sport England guidance. There are two points that are pertinent to this particular consultation, however. The first is that the Bury's playing pitch strategy (PPS) is regarded by us as being out of date. The PPS was produced in 2011 and the assessment itself is based upon data from 2010. The 'Towards A Level Playing Field' methodology it followed recommended that the data underpinning the assessment was refreshed every two years. Sport England's 'Fit for Purpose Framework' for PPSs using that methodology regards a PPS as being out of date if the data and consultation on which the strategy is based is three years old. Indeed, Bury's own PPS includes an objective to refresh and update the databases containing the assessment data on a season by season basis. This does not appear to have happened. The PPS strategy document on Bury Council's website has a cover which states the document was updated in 2015. However, the content appears largely unchanged from the 2011 version. Moreover, the playing pitch assessment document itself has not been updated and it contains findings based mainly drawn from data relating to the 2009/10 season.

The second point relates to the use of standards. Sport England no longer advocates the use of local standards in relation to assessing or meeting needs for sports facilities. Neither our current playing pitch strategy guidance ('Playing Pitch Strategy Guidance - An approach to developing and delivering a playing pitch strategy') or our assessing needs and opportunities guidance ('Assessing needs and opportunities guide for indoor and outdoor sports facilities - How to undertake and apply needs assessments for sports facilities') includes the calculation of standards. Whilst previous national planning guidance (PPG17 and Companion Guide Guide) identified the need to adopt local standards, the National Planning Policy Framework is focussed on the delivery of specific facility needs. Our assessments therefore set out to identify specific geographic and / or individual facility needs. These can then be clearly set out in a list and taken forward in a strategy/policy document which identifies how best the needs and issues can be addressed and delivered.

The site by site and area by area Action Plan that results can also be linked to proposed housing developments. Part of the Action Plan will identify what improvements/new areas of playing field are needed to accommodate existing unmet demand and future growth. Indicative costs can then be attributed to each site which in turn could be linked to Planning Obligations to ensure contributions go to the right site in order to implement those improvements. Alternatively, the costed new provision / improvements can be used to inform the level of CIL contributions.

The guidance referred to can be found at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and->



[guidance/playing-pitch-strategy-guidance/](#)

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

Local standards do not identify specific needs. Consequently, a strategy based on achieving a local standard will not address the needs. This can be illustrated using the current Greenspace Audit and Strategy (GAS). The GAS identifies a local standard for outdoor sport provision of 0.83ha per 1000 population. Bury East has an excess of outdoor sport provision based on the quantitative standard for outdoor sport in the GAS (Table 18). This crude standard suggests that in terms of quantity, Bury East has at least adequate provision. Appendix 5 shows local standards based on playing pitches, and Bury East has 0.88 ha of pitches per 1000 pop. Whilst no target standard is shown, this figure is the highest recorded by any township and again suggests a good level of provision.

Bury's playing pitch assessment paints a different picture, though. Leaving aside site specific issues such as pitches being overplayed, for Bury East the PPS identified that at peak times there was a current surplus of 18.5 senior football pitches, but a deficit of -15 junior football pitches and -5 mini football pitches. In addition, there was a deficit at peak time of more than -2 cricket pitches, a deficit of rugby union pitches etc. The GAS standard does not identify any of these sport specific issues (indeed, a single standard could not identify sport specific findings). As a result, the strategy element of the GAS cannot address the issues.

From our perspective, the main concern is that the use of standards will not ensure that the deficiencies relating to sports are correctly identified and addressed. There is also a risk that a developer will try and exploit differences in messages given by detailed findings from a playing pitch strategy and a local standard (eg by arguing a contribution is not necessary).

#### Para 3.14

The consideration of ongoing maintenance and management of greenspaces is important, especially in the context of continued reductions in local authority budgets. In the case of formal sports provision, inadequate maintenance will quickly result in facilities not being fit for purpose and them being unable to perform their function. Making explicit that developers will have to make provision for future maintenance is therefore supported.

#### Para 4.14

This paragraph refers to a quality benchmark for parks. Performance Quality Standards (PQS) have been developed to set minimum standards for playing pitches. These cover a range of objective measures (such as slope, evenness, grass cover, water infiltration rate etc.) and national governing bodies for sport have set minimum standards for community sport pitches to achieve. These could be referenced as a minimum quality standard for new pitches. Further information can be found in 'Natural Turf for Sport' which can be found at:

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport/>

#### Cost information

For information, Sport England produces capital and lifecycle costs for a range of sports facilities which indicate how much it costs to build and maintain them. This information may be of use in calculating the level of developer contribution. Information can be found at:

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/cost-guidance/>

I trust the above comments are of use. If you require any further information, please contact me.

**REF NO: 646**

**Oldham Council**

**Representation:**

Thank you for consulting us on Bury Council's Draft Open Space, Sport and Recreation Provision in New Housing Development SPD. Whilst we do not have any specific comments to make on the SPD we look forward to being consulted on further Planning Policy documents and to working together, along with other Greater Manchester Authorities, in the future.

**REF NO: 690**

**NATURAL ENGLAND**

**Representation:**

RE: SEA screening determination for the revised draft SPD1: Open Space, Sport and Recreation Provision in New Housing Development  
Natural England have no further comments.

**REF NO: 1546**

**NATIONAL TRUST**

**Representation:**

Thank you for notifying National Trust of the above consultation.

Overall the up-dating of the SPD is supported and generally there is little that we would take issue with.

Our one concern continues to be the somewhat blinkered approach to the provision and management of green infrastructure across the Borough and in particular the role of partners of the Council in delivering and managing green space. In that context it is unclear how developer contributions will be distributed given that the main focus is now on up-grading and improving existing green spaces as opposed to entirely new provision. As noted in the Council's Greenspace Strategy of 2010 many residents of the Borough benefit from access to 'privately-owned' countryside and that its role in off-setting the demand for natural and semi-natural greenspace should not be under-estimated. The Strategy also identified some, albeit not necessarily all, of the issues affecting such areas, e.g. implementation of the Rights of Way Improvement Plan to, inter alia, facilitate access to the countryside, and the improvement of principal sites in the green infrastructure network. It is unclear from the text at paras 4.1 and 4.2 of the draft SPD how this will be achieved, particularly for non-Council owned sites. Clarification of how the proposed mechanisms will be utilised to secure improvements to other green infrastructure should be included in the SPD.

**REF NO: 1644**

**DEPARTMENT OF HEALTH**

**Representation:**

Thank you for your letter of 19 February to the Department of Health about the Council's supplementary planning document. I have been asked to reply.

I have passed your correspondence to my colleagues in the Department's Estates team and they have advised that you may also wish to send your documents to the NHS Bury Clinical Commissioning Group (CCG) for information, which is responsible for the commissioning of the majority of healthcare services in the area. The contact details are:

NHS Bury CCG  
21 Silver Street  
Bury BL9 0EN

**REF NO: 5856**

**Barratt Manchester**

**Representation:**

I hope the following comments assist re: Consultation Draft SPD 1 (February 2015):

1. First, to confirm that we are keen to build new homes in Bury on viable and attractive sites and seek to work with the LPA to achieve this;
2. The SPD supplements not only UDP Policy RT2/2 but also needs to be read within the context of UDP Policies RT1, RT3 and RT4 (if saved). Clearly these policies date back to 1997 and we therefore support the LPA's production of the Greenspace Audit and Strategy (February 2015);
3. We assume that that Strategy (especially Tables 2 and 3 of the Executive Summary) is a robust and up-to-date evidence base. It identifies sub-areas within Bury in terms of both quantity and quality of categories of open space. This nuanced data is material to the application of SPD1. It might be, for example, that a development could upgrade the quality of existing facilities off-site where local quality is a consideration. We therefore ask that SPD1 includes Tables 2 and 3 and makes clear that considerations of existing quality and quantity will inform planning decisions on a site by site basis;
4. Whilst all areas are deficient (Para 2.2 of SPD), the UDP acknowledges that it is not a realistic objective to reach level or above. Equally, cross-boundary cooperation on assessing supply and accessibility would give a fuller picture and we note the conurbation-wide Greater Manchester Spatial Framework. Conurbation wide, certain sport and recreation facilities will serve a wide population (eg. Cycle Velodrome) and this too may be material especially with good Metrolink connections (accessibility being one measurement of provision);
5. We support the principle of your priority of off-site contributions rather than on-site provision (Section 3) for all scales of development. Residential proposals with higher densities, as a consequence, should be supported and not resisted on the basis of density;
6. Para 3.13 - private gardens do, however, serve a purpose and should not simply be disregarded. Typically, a private garden reduces the need for public space relative to a scheme with no private play space;
7. 3.14 - we typically make Management Company provisions for on-site POS, either via Condition or S106;
8. 4.2 - these CIL provisions apply from 1st April and therefore S106 will need to be correctly worded;
9. 4.4 - we seek up-front agreement on the level of the fees referred to here, to control our costs;
10. Viability (4.8-4.10) - any such assessment to accord with NPPF and RICS guidance and typically BCIS is used as an acceptable standard. Viability still remains an issue for the industry and we support reference to it here;
11. Appendix 2 - the sums referred to have not been viability tested (see above). Furthermore, most schemes have a mix of house types;
12. Appendix 3 - we have undertaken many viability reports to industry-accepted standards (supported at appeal) and look to work with an LPA on that basis, using BCIS costs.

We ask that you consider the above when revising the Draft SPD1 prior to formal adoption.

**Representation:**

On behalf of Chandos Remediation and The Brickworks (Bury) Ltd, and with advice from Grasscroft Development Solutions (GDS), please see our response below. We have extracted the relevant paragraphs and provided comments in red below each paragraph.

Viability

4.8 The Council will take into account national planning policy in giving careful attention to viability and costs in plan-making and decision taking. Should an applicant argue against the provisions of this SPD on the grounds of viability, the Council will require a full viability appraisal which satisfactorily demonstrates that such provisions would render a scheme unviable. This should be carried out on the basis of a 'residual land valuation' and Appendix 3 sets out the minimum amount of information that should be included within an appraisal.

Grasscroft Development Solutions (GDS) agree with the Authority's approach to adopt the 'residual land value' methodology. However, this approach in isolation can only work if tested against one, or a number of relevant benchmarks to establish a market acceptable level of return for both developer and land owner. Examples of this include benchmarking the residual land value against comparable residential land values; existing use value plus an uplift to incentivise the land owner to sell, or a market acceptable level of profit on Gross Development Value (GDV).

4.9 In particular it is recognised that affordable housing schemes delivered by Housing Associations or Registered Providers are often dependent on external funding and planning obligations can often threaten their viability. Such schemes will be considered on a case-by-case basis and will take account of the full scale of developer contributions required.

4.10 Applicants should be aware that negotiations on recreation provision will be on the basis that an applicant has bought a site or is purchasing a site at a price that has taken account of all known constraints and planning policy requirements, including recreation provision. Applicants looking to negotiate the recreation provision required will need to demonstrate this, together with the particular site circumstances that would warrant a reduced provision. Such information may need to be independently assessed and where this is the case, the reasonable costs for doing so will be borne by the applicant.

The Authority's inference that the developer and / or landowner should reduce their profit margin and / or site value, below an acceptable market level to factor in full policy requirements is contrary to Planning Practice Guidance (PPG), National Planning Policy Guidance (NPPF) and RICS Guidance Note: Financial Viability in Planning.

The Authority's draft wording disregards that a land owner and developer should both make a competitive return.

Paragraph 173 of the NPPF states.. .

'To ensure viability, the costs of any requirement likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking into account the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'

The PPG makes specific reference to a land owner's competitive return in Paragraph 24 .. .

'A competitive return for the land owner is the price at which a reasonable land owner would be willing to sell their land for the development. The price will need to provide an incentive for the land owner to sell in comparison with the other options available. Those options may include the current use value of the land or its value for a realistic alternative use that complies with planning policy.'

Paragraph 2.1.2 of the RICS Guidance Note: Financial Viability in Planning further reinforces the above, by stating that financial viability for planning purposes is defined as follows . . .

'An objective of the financial viability test is the ability of a development project to meet its costs including the cost of planning obligations, whilst ensuring an appropriate site value for the land owner and a market risk adjusted return for the developer in delivering that project.'

Please confirm due receipt of this representation.

**REF NO: 6255**

**Frost Planning on behalf of Bellway Homes Ltd**

**Representation:**

On behalf of Bellway Homes Ltd and with advice from Grasscroft Development Solutions (GDS) please see our response below. We have extracted the relevant paragraphs and provided comments in red below each paragraph.

Viability

4.8 The Council will take into account national planning policy in giving careful attention to viability and costs in plan-making and decision taking. Should an applicant argue against the provisions of this SPD on the grounds of viability, the Council will require a full viability appraisal which satisfactorily demonstrates that such provisions would render a scheme unviable. This should be carried out on the basis of a 'residual land valuation' and Appendix 3 sets out the minimum amount of information that should be included within an appraisal.

Grasscroft Development Solutions (GDS) agree with the Authority's approach to adopt the 'residual land value' methodology. However, this approach in isolation can only work if tested against one, or a number of relevant benchmarks to establish a market acceptable level of return for both developer and land owner. Examples of this include benchmarking the residual land value against comparable residential land values; existing use value plus an uplift to incentivise the land owner to sell, or a market acceptable level of profit on Gross Development Value (GDV).

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