

FoE questioning of Mr Sutton at the Model Farm Inquiry 26 March 2026

Requirement to show Viability of Employment Allocations in Local Plans

The Development Plans Manual (Edition 3, 2020) requires that any employment allocation must be shown—at the point of plan-making—to be *sustainable, deliverable and financially viable, with “sufficient financial headroom to accommodate all of the plan’s policy requirements”* (s.3.43–3.44).

3.30 To maximise involvement and the effectiveness of all stages of plan preparation, as much evidence as possible should be provided at the candidate site stage, including a **financial viability assessment**. This applies to all candidate sites.

3.36 requires the LPA to use the *“candidate site process to gather suitable evidence from site promoter to robustly demonstrate the sustainability, deliverability and financial viability”* of their site to be assured both that the site is *“capable of being delivered”*.

3.10 states deliverability must explicitly take account of *“necessary infrastructure requirements, financial viability and other market factors”*

3.36 requires evidence that the site can be *“freed from all constraints”*, meaning that abnormal and infrastructure costs must be quantified and fundable.

DPM requires *“detailed evidence upfront”* and a *“greater depth of evidence at the candidate site stage”* (s.3.29–3.30), and warns that *“an inadequate level of information to demonstrate delivery can be a reason for discounting sites”* (s.3.39), which precludes reliance on speculative future demand or untested commercial assumptions.

Crucially, s.3.43 requires evidence of a *“serious intention to develop the site”* and an ability to do so *“within the timeframe of the plan”*; ie.employment land proposers must demonstrate a reasonable prospect of delivery within the plan period, supported by credible commercial evidence rather than aspiration. Taken together, these provisions establish a clear and binding requirement that employment allocations to be taken forward in the RLDP must be supported by robust, quantified evidence of commercial deliverability, realistic market conditions, and sufficient financial headroom to meet all policy and S106 obligations.

The DPM underpins the LPA’s concise requirement (in RLDP *Candidate Site Assessment Methodology*)

Stage 3: Site Specific Viability Assessment is needed in order to ensure that sites which progress to allocation within the RLDP can satisfy new policy requirements and remain viable and deliverable

The specific requirement on LDP sites proposed for carrying forward is

3. Consideration of Existing LDP Allocations

3.1 ...the Council will require existing LDP site allocations without extant planning permission to be re-appraised through the candidate site assessment process, and the owners of such sites should not presume that they will be automatically carried forward as part of the review.

3.2 Consequently, owners / developers of existing LDP site allocations **must** make a candidate site submission

This procedure ensures DPM’s up-to-date requirement is covered (DPM *Review and Revision*, p.198)

essential that LDPs are kept up-to-date to ensure effective and consistent planning decisions, supporting the objectives of a plan-led system and minimising speculative development.