

19<sup>th</sup> May 2016

John McNairney  
Chief Planner  
The Scottish Government

**By Email Only: [Chief.Planner@gov.scot](mailto:Chief.Planner@gov.scot)**

Dear Mr McNairney,

### **Draft Advice of Net Economic Benefit and Planning**

Under one of the key policy principles of Scottish Planning Policy (2014), the presumption in favour of development that contributes to sustainable development is supported in part by giving due weight to net economic benefit.

In the case of proposals for residential development, usually contrary to the development plan, it is for the developer to demonstrate that the proposal can meet the terms of SPP, and the specific criteria set out in paragraph 29.

It would appear that the purpose of the Draft Advice is to provide additional clarification on the terms of such consideration, and the weight that it should be afforded in the determination of an application.

On this basis, the Draft Advice is supported by Gladman as a mechanism for actively recognising economic benefit as a material consideration in the determination of a planning application. Too often economic evidence submitted in support of a proposal is overlooked by the planning authority and not adequately assessed or addressed in weighing up the planning case.

Paragraph 4 refers to justification for new residential development typically being based on housing need and contributing towards meeting housing supply targets but that currently it will not usually be necessary to also make an argument regarding the economic benefit of a proposed housing development. It states that when a proposal is contrary to the development plan, or where other material considerations indicate that the decision on whether to grant planning consent is finely balanced – the net economic impact of the development, including the number of jobs it is expected to create, should be one of the factors taken into account in the planning decision.

Taking SPP at face value, in justifying proposals under the sustainable development criteria of paragraph 29, Gladman routinely submit an economic case in support of the development, setting out the potential for direct and indirect economic benefits of the development. In our view the requirement is already clear per SPP and whilst the onus is upon the developer to provide the supporting information, this must be followed up with due assessment by the planning authority in terms of its material weight.

We attach some infographics we have produced as a simplified means of getting this message across to consultees, the public and planning authorities.

Whilst in our view the terms of SPP are quite clear, if it deemed necessary to carry this Advice forward as policy guidance, it would benefit from explicit clarification that the economic benefits of residential developments are a material consideration and should be taken into account wherever they are evidenced. In so doing there should be recognition that planning authorities should be adequately resourced and skilled to review and assess such documentation.

Trusting the above is of assistance, we would be happy to provide further information as required.

Yours faithfully.

for  
**Gladman Scotland**  
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# Brotherton Farm Housing in Figures

## Construction Stage Effects



**£20,100,000** Construction Investment

**191** - The number of construction jobs supported throughout the 4 year build period – Equivalent to c.48 jobs on site per year.



An additional **343** indirect/induced jobs supported during construction



**£GVA £7.3m** Gross Value Added over the construction period

## Operational Effects

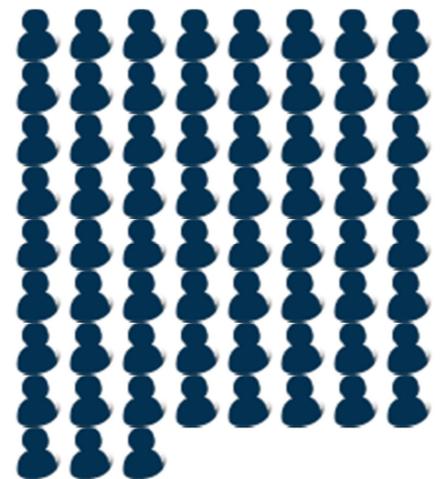
Support **67** retail and public sector jobs



**c. £340,000** - Council Tax Revenue per annum

**c. £1,751,000** - Additional retail spend retained within the Livingston area

**c. £3.0m** - Disposable income delivered to the local area



## Labour Market Supply

**245** - Additional economically active adults in Livingston



# Executive Summary:

## Economic Benefits of the Proposed Development

### Construction Stage Effects



**£13.1m** Construction Investment

**106** - The number of construction jobs supported throughout the 4 year build period – Equivalent to c.27 jobs on site per year



An additional **114** indirect/induced jobs supported during construction



**£ GVA** **£6.3m** Gross Value Added over the construction period

### Operational Effects



c. **£208,000** -Council Tax Revenue per annum

c. **£576,000** -Additional retail spend retained within the East Lothian area per annum

Support **35** retail and public sector jobs

c. **£2.2m** -Disposable income delivered to the local area



### Labour Market Supply

**166** – Additional economically active adults in Pencaitland

