From: Tammy Adams **Sent:** 19 May 2016 16:47

To: Chief Planner

Subject: Draft Advice Implementation Net Economic Benefit and Planning Guidance

Dear John

Homes for Scotland notes that this draft advice relates primarily to non-residential development.

We support the advice given, at paragraph 4, that "New residential development helps to meet housing need and contributes towards meeting housing supply targets, however it will not usually be necessary to also make an argument regarding the economic benefit of a proposed housing development". This should help deter local authorities from requiring economic impact statements (or similar) as part of their information requirements for applications for residential developments.

We would welcome an addition to the guidance which clarifies that the economic benefits of residential developments can be a material consideration and should be taken into account wherever they are evidenced. This would provide useful clarity on the point. To this end we would suggest the following addition to the existing wording:

New residential development helps to meet housing need and contributes towards meeting housing supply targets, however it will not usually be necessary be necessary to also make an argument regarding the economic benefit of a proposed housing development. The economic benefits of a residential development may however be material to a planning decision and should be given due weight where evidence is provided in support of a planning application.

Regards,

Tammy

Tammy Adams
Head of Planning
Homes for Scotland

5 New Mart Place, Edinburgh, EH14 1RW

Website: www.homesforscotland.com

In order to tackle Scotland's housing crisis and ensure that we have **enough homes of all tenures in the right locations** to properly house our growing population, Homes for Scotland is calling for at least 100,000 new homes by the end of the next Scottish Parliament. Click here to read our manifesto in full or visit www.homesforscotland.com for up to date market commentary.



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