



**DRAFT ADVICE ON NET ECONOMIC BENEFIT AND PLANNING  
BANKS GROUPS COMMENTS**

- 1 The Banks Group welcome the introduction of guidance on giving due weight to the net economic benefits of proposed developments in the planning process. Despite Scottish Planning Policy (SPP) setting out that due weight should be given to net economic benefit, in our experience this does not happen in practice. Since the publication of SPP in 2014 we have not seen the requirements relating to giving consideration to net economic benefit being reflected in planning decisions. When determining applications a lot of weight is placed on the environmental aspects of applications, but not on the social or economic elements.
- 2 To ensure that economic benefits are taken into account we believe that the draft guidance should be made stronger in places to emphasise the importance of this consideration. For example, paragraph 2 of the draft guidance sets out that economic benefit of the development “*may*” be a material consideration. We feel that this should be change to ‘should be’ to highlight the importance of taking economic benefits into account.
- 3 Given the requirements of SPP we would also question why the guidance implies that it is only for developments that are contrary to the development plan or where a decision is finely balanced that economic benefit should be a consideration. Based upon SPP should it not be good practice for all developments to outline the economic benefits associated with them (where they exist) and for planning authorities to be required to take these into consideration in the determination of applications.
- 4 We welcome and support the statement in paragraph 22 that “*Where socio-economic baseline information suggests that economic benefit is particularly needed in the community/communities affected by the development, the economic impact on them should be given **significant** weight in the decision making process.*” This correctly recognises that the need for economic benefits will vary depending on the location of the development and where there is more need the benefits should be given more weight.
- 5 While we generally welcome the onshore wind example, the final sentence implies that the benefits derived from a community ownership offering can only be considered if the scheme is acceptable. This implies that a community ownership offering cannot be taken into consideration in a more marginal scheme. We would question how this sits with paragraph 4 of the guidance which sets out that economic benefits should be assessed in marginal applications. We believe that an offer of community ownership should be treated as a material consideration in the determination of all onshore wind applications, no matter how the application fits with the local development plan.
- 6 In conclusion, while we welcome guidance relating taking economic benefits into consideration when determining planning applications and have no concerns with the mechanism that has been set out in the draft guidance for calculating net economic benefit, we are concerned that this document is rather technical/complexed. Rather than encouraging consideration of economic benefits it could make it appear a more daunting task and discourage planning authorities from taking economic benefits into consideration.
- 7 The introduction of this guidance should clearly set out that economic benefits **should** be taken into consideration in the determination of all planning applications.
- 8 While not necessarily directly related to this document to increase the importance that is placed on economic considerations in the planning process the Banks Group believes that a new statutory consultee, who is responsible for promoting economic development, should be introduced into the planning system. This would help planning authorities ensure that policies and decisions give due weight to net economic benefit, a requirement of SPP.