

Mr John McNairney  
Chief Planner  
Scottish Government

[sent by email - Chief.Planner@gov.scot]

18<sup>th</sup> May 2016

Dear John

### **DRAFT ADVICE ON NET ECONOMIC BENEFIT AND PLANNING**

Clydeplan and the constituent authorities welcome the production of this guidance by the Scottish Government and the opportunity to respond to this consultation.

In general the principle that “net” economic benefits are taken account of will ensure that the impacts of development proposals on existing centres/developments, are considered and this is positive.

However, given the complexity of the development management assessment process, the advice could perhaps be reworked and possibly shortened, to further emphasise the need for a proportionate approach.

A number of suggestions are provided within this response however now that the draft is available for comment, and further to the receipt of feedback from the consultation, it is suggested that a workshop or similar event is convened involving development planning and development management officers with experience of handling such “finely balanced” decisions, along with other stakeholders, to fine tune the draft guidance, reflecting the experience of practitioners.

Suggested considerations and potential amendments include the following:

- 1) consideration could be given to the introduction of a threshold, along with a caveat there may be particular circumstances where assessments of Net economic benefit may be appropriate for local developments or where there are cumulative impacts. It is likely that these considerations will apply in the main to applications that are above the major threshold;
- 2) application of thresholds, combined with a scoping and sifting approach to assess the likely scale of impacts as referenced in the Draft at paragraph 21, may assist in developing a proportionate approach;
- 3) further guidance specific to this paragraph 71 of SPP, which refers to the scale of development where retail impact assessments are required, may be appropriate;

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- 4) housing proposals are assessed against need and demand, the 5 year effective land supply and development plan policy and strategy. There therefore seems little requirement for net economic benefit to be used as a consideration. Additionally, housing unit cost/benefits are likely to be a more of a constant and will not vary significantly; therefore the advice, and scope of the advice, could be much shorter and more focussed if referencing:
  - a. a threshold to which the guidance applies;
  - b. a sift of the likely scale of impacts which will influence the level of detail required for the Assessment;
  - c. that the guidance is unlikely to be relevant to housing proposals;
- 5) A recent planning appeal (PPA-320-2096) in North Lanarkshire Council heard evidence on Net Economic Benefit which may be a relevant consideration;
- 6) It would seem that the opportunity is before the Scottish Government to encompass the Advice on net economic benefit within the emerging planning delivery advice.

Thank you for the opportunity to comment on the draft guidance. I trust these comments will be of assistance. The above are however suggestions and as stated earlier a workshop or similar event, involving experienced practitioners to further hone the guidance is recommended.

Clydeplan would welcome the opportunity for further involvement as you finalise the advice.

Yours sincerely

**Dorothy McDonald**  
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