

## **Shields M (Melissa)**

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**From:** Dale, Andy (DRS)  
**Sent:** 20 May 2016 16:42  
**To:** Chief Planner  
**Cc:** Johnston, Cathy (DRS)  
**Subject:** FW: Draft Advice Implementation Net Economic Benefit and Planning Guidance

Dear Sir / Madam

In reference to the Draft Advice Please find below the Comments from Glasgow City Council.

The clarification on how to apply the policy is welcomed. In particular it is helpful to see certainty of when the consideration of NEB should take place (i.e. cases that are contrary to policy or are balanced and being considered relative to material considerations)

The potential economic impact of a development is something that is obviously not lost on planning authorities and members and does receive consideration when assessing development proposals. The draft advice seeks to build upon the established desire to achieve sustainable economic growth by setting out a broad approach designed to deliver a balanced and more comprehensive assessment of economic impact/benefit. However, the parameters that are identified to make the assessment more responsive to the wider context are likely to make the assessment considerably more complicated than it is at the moment. This will lead to a burden for developers in preparing the assessment and for Local Authorities in agreeing to consider, scoping out and assessing the submission. All of which may not alter the existing process significantly. This will be unlikely to contribute to the broad aims of achieving a more streamlined and responsive planning process. It is also potentially the case that by formalising the procedure to such a degree, applicants may be motivated to promote arguments for NEB to be taken into consideration when they do not satisfy the circumstances when it is to apply, thereby creating a potential area of conflict where currently there is none. From local experience, since the introduction of the Net Economic Benefit, there is little evidence of developers promoting the economic arguments any more than they did before its introduction.

Aside from the complications involved, there is also a risk of double counting an economic benefit where the Development Plan already takes account of national policy and gives weight to potential benefit. Here in Glasgow one of the Key Outcomes in the emerging City Development Plan is to achieve a Vibrant and Growing Economy. Therefore, this will be a consideration in the assessment of the type of development proposals likely to be the subject of a NEB assessment. Consequently the benefit could be given disproportionately more weight than intended.

On the basis of these factors it is considered that the draft guidance is unnecessarily complex and will place a disproportionate burden on developers and planning authorities, with relatively limited benefit.

Yours sincerely

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