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From: Development.Plan@Eastdunbarton.gov.uk
Sent: 20 May 2016 16:33
To: Chief Planner
Cc:
Subject: Draft Advice Implementation Net Economic Benefit and Planning Guidance - East Dunbartonshire Council response

Dear Chief Planner,

The Council is supportive of the approach set out in the draft advice and believe it will provide a more clearly defined mechanism for establishing economic impact. 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.

Given the complexity of the development management assessment process, the advice could be reviewed to further emphasise the need for a proportionate approach. A number of suggestions are provided within this response however 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. This would help to fine tune the draft guidance and ensure that the experience of practitioners is adequately reflected. In addition, whilst the example scenarios are welcomed, a pilot could be carried out in order to provide some practical 'real life' examples.

We would offer the following comments, including a number of potential amendments:

1. The status of the guidance is unclear ? will it be adopted as a Planning Advice Note?
2. 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.
3. 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.
4. For retail proposals, this function is already established by means of a Retail Impact Analysis, as referred to in paragraph 71 of SPP. There is a need to clarify the relationship between the two, and whether this proposed mechanism replaces the need for a traditional RIA. Further guidance specific to paragraph 71, which refers to the scale of development where retail impact assessments are required, may therefore be appropriate.

5. The key to the success of this is likely to be how the boundary of the study area is compared. Consultants, in our experience, often dispute the study area to suit their own interests and more detailed analysis may be required to minimise any grounds for disagreement. It may be ambitious to rely on pre-application discussions for his purpose.
6. Can web links to sources of data on market prices be provided? For example paragraph 18 refers to sales revenues generated by shops ? are there average sales values for different locations that authorities could use to compare to applicants estimates?

In general terms the Council is also mindful of the current pressure on local authority resources and the potential impact of introducing new assessments to development planning and management teams. The provision of training for planners and other practitioners would be welcomed as noted above.

I trust these comments will be of assistance. East Dunbartonshire Council would welcome the opportunity for further involvement as you take forward the advice document.

Kind Regards,
Richard Todd

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