

Fife Council - Draft Advice on Net Economic Benefit and Planning Consultation

Comments

Fife Council welcomes the opportunity to comment on the Draft Advice on Net Economic Benefit and Planning. It will assist in providing clarity on measuring and understanding the economic outputs of development.

We agree that where a proposal complies with the development plan it should not necessary for the applicant to demonstrate that the proposal creates net economic benefit.

We agree that the assessment should be carried out by the developer and evaluation of the assessment by local authorities. Early engagement to agree the scope would require a process (and officers) to do this within the planning/development management timescales.

Fife Council believes the Advice should also take account of place-making, regeneration and the sustainable use of Scotland's natural resources and cultural assets. We recommend that the Advice should be amended to consider net economic effects within the wider context of sustainable development and sustainable economic growth.

The guidelines mentioned are taken from the Treasury Green Book which is standard for someone with experience of economic appraisal and therefore appropriate. There may be training requirements to establish a pool of officers who could do these based on the estimated volume of assessments likely to be carried out. There is a potential need for transitional arrangements to be developed e.g. an external consultant to act as a peer reviewer as internal expertise is developed.

We agree that that the level of detail of any assessment is kept proportionate to the likely scale of the net economic benefit, and that assumptions made are completely transparent, evidence-based and as accurate as possible.

We agree that it is important to determine the scope of the assessment e.g. Fife wide; more local area or if there are economic impacts wider than Fife i.e. affecting neighbouring council areas. The data available will vary across these different geographies and may need to rely on assumptions that local authorities might need to ask all developers to use rather than each application using unique ones. The scenario examples in the advice are helpful and give a real world context.

Calculating the net economic impact seems to be based on different sectors e.g. retail; commercial; tourism etc. There is an opportunity to gather evidence of assessments elsewhere in Scotland in comparable local economies (e.g. we have the SOLACE benchmarking families) so that assessments could be challenged if necessary.

For example in the retail case study, a range of evidence and consultation are mentioned. Fife Council is coordinating a Property group that might be a vehicle for commercial/industrial property and maybe the Business Improvement Districts (BID) for retail. A transparent process would be required for this.

More thought and content is required in relation to the potential effects from development on the rural economy. Tourism and recreation sectors in particular need more attention in this respect.