

---

**From:** Smith, Aedan  
**Sent:** 20 May 2016 15:22  
**To:** Chief Planner  
**Subject:** Draft Advice on Net Economic Benefit and Planning

Dear John,

RSPB Scotland supports the comments from Scottish Environment LINK Planning and Economics Groups but there are a few points I would like to add.

We do have some serious concerns with the approach proposed. We are also very concerned about the unusual approach taken to the consultation. In particular, it is not clear whether or how an SEA would be carried out of the draft advice. In our view, an SEA would certainly be required if the advice was likely to affect how project consenting decisions are made, and that is clearly the intention.

In terms of the advice itself, our overarching concern is that the advice, if carried forward, would significantly increase the weight given to purely financial economic considerations at the expense of other material considerations. This is contrary to the longstanding, generally good, work of the Scottish planning system in balancing competing interests, including financial interests, in the long term wider public interest.

The current SPP provides a good description of how the planning system should operate in the context of the Government's central purpose, sustainability and the presumption in favour of development that contributes to sustainable development. In contrast, the Draft Advice is unclear and confused and seems to run contrary to the approach put forward in the SPP. In particular the Draft seems to assume that economic considerations are not given sufficient consideration or weight at present, particularly where EIA is carried out. In our experience, this is rarely the case. EIAs usually include an integral section on socio-economic impacts and this is then a material

consideration for the decision maker. In fact, in our experience, the converse is often true. Even when an EIA is carried out, environmental considerations are often given only limited weight when compared with the weight given to financial considerations.

As currently drafted, RSPB Scotland would be likely to resist the Draft progressing to become formal advice. However, we would be very happy to discuss the points above and other aspects of the guidance in more detail to explore whether an improved approach could be developed.

Kind regards

Aedin

**Aedin Smith MRTPI**

Head of Planning and Development

**Scottish Headquarters** 2 Lochside View, Edinburgh Park, Edinburgh, EH12 9DH

[rspb.org.uk](http://rspb.org.uk)

Let's give nature a home in Scotland



RSPB Scotland is part of the RSPB, the country's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

This email and any attachments may contain material that is confidential, subject to copyright and intended for the addressee only. If you are not the named recipient you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender and then delete this email from your system. The Royal Society for the Protection of Birds (RSPB) is a registered charity in England and Wales no. 207076 and in Scotland no. SC037654.

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

\*\*\*\*\*

This email has been received from an external party and  
has been swept for the presence of computer viruses.

\*\*\*\*\*