

South Lanarkshire Council
Draft Advice on Net Economic Benefit and Planning

1. Introduction.

- 1.1 We welcome the opportunity to comment on the above and note that the aim of the advice is to help developers and planning authorities consider the contribution of development proposals to the economy whilst also recognising their potential impacts. In general, it is considered that whilst the case where this assessment is required may be limited the preparation and assessment of the required information does introduce a new demand on both developers and Local Authorities which has to be factored into the Development Management process. In this regard it is important that the document does emphasise that the process is only relevant in a very limited number of cases. In particular it is important that there is a clear indication that the submission of supporting information in respect of net economic benefit is not intended to be relevant in all cases. In particular, as footnote 1 points out, it would have to be considered relevant to the particular application being assessed.

2. Comments

- 2.1 In paragraph 4 it is stated that the ‘advice is likely to relevant in assessing the impact of applications that are contrary to the development plan’. This would appear to suggest that in all such cases (with exception of housing - referred to later in the paragraph) net economic benefit has to be taken into account, and an assessment of net economic benefit will therefore be required; regardless, of the scale or nature of such developments or of the degree to which they run contrary to the spatial strategy or policy direction set out in the Development Plan. This is likely to generate the submission of such assessments in larger numbers than the document anticipates and, despite allowing for the opportunity to ensure the information provided is proportionate, this will implications for the DM process.
- 2.2 The flow chart depends on a Yes/No answer to the question ‘Is the proposed development plan in line with the development plan?’ If, however, as footnote 2 advises, the development plan already gives ‘due weight to net economic benefit’ then it will have already generated the need, if appropriate, to include consideration of this factor as a material consideration?
- 2.3 In paragraph it may be appropriate to state that the policy objectives can be both at the strategic and local level.
- 2.4 In the example used at paragraph 18 – 20 it may be appropriate to also include a reference to the deadweight effects which would be associated with a new retail centre but where space was allocated in the development plan for the expansion of an existing centre.
- 2.5 It is important that the approach taken in the guidance does not create an impression that ‘net economic benefit’ can trump other material considerations. It is one factor to be considered, in specific circumstances.