

■ Hello,

My comments on behalf of SWT are in effect a repeat of the comments sent on the Preliminary Draft Charging Schedule (see attached).

We welcome the amendments to the variation between the urban and rural charge, but otherwise see little change in the document. It is uncertain to what extent natural and semi-natural open space has been included and hence whether appropriate use of the evidence has been made. It is our view that natural and semi-natural open space is a key component of the infrastructure needed to support a community. This is supported by Natural England's recommended Accessible Natural Greenspace Standards (ANGSt) which provides guidance for the level of provision at a community/district level.

It does not appear that environmental sustainability is being used as a possible factor in reducing the levy for particular developments. Use of SUDS/multi-functional greenspace/green roofs, etc. etc. should be encouraged financially through the planning process as a long-term contribution to the county infrastructure. This might also be a way to reduce the proposed urban/rural divide in the levy charge, as rural development might offer greater scope for some of these types of features at a smaller scale.

Finally although the CIL is focused on capital delivery I would again highlight the need for policy provision for the cost of long-term management of green infrastructure and the need for Section 106 agreements that explicitly provide such provision.

Regards,

Robin.

Robin Mager

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Shropshire Wildlife Trust is a registered charity number 212744
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Shropshire Levy Preliminary Draft Charging Schedule: Response Form



**Community Infrastructure Levy
Preliminary Draft Charging Schedule**

Response Form

Please return to:

Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND, preferably by email to

BY 5pm Friday 18th February 2011

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mr	
First Name	Robin	
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Shropshire Levy Preliminary Draft Charging Schedule: Response Form

Question 1. Do you support or object to the proposed levy rates for residential development, and why?

<i>Proposed rate</i>	<i>Support/Object</i>	<i>Why?</i>
Shrewsbury - £40/m ²	Support	Residential development clearly places a burden on existing infrastructure. Existing infrastructure will need enhancing and new infrastructure created.
Sustainable Urban Extensions - £40/m ²	?	If the rate is the same is it necessary to have additional definitions of geographical areas?
Market Towns and Other Key Centres - £40/m ²	?	If the rate is the same is it necessary to have additional definitions of geographical areas?
Rural: rest of Shropshire - £120/m ²	Support	While there may be justifications for a higher rate in rural areas the difference between the two rates is significant and might warrant further investigation.

Question 2. Do you have any evidence to support your views in relation to residential development?

Please attach additional sheets if necessary

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Question 3. Do support / object to the proposed 'nil' rate for other types of development?

Please attach additional sheets if necessary

Proposed rate	Support/Object	Why?
Employment and commercial development	Object	Employment related development should be included within the CIL charging as such developments do have an impact on the green infrastructure, water supply and drainage, energy network, traffic, etc.
Hotels, residential institutions, assembly & leisure	As above	As above
Affordable housing on single plot exception sites (the "build your own affordable home" scheme)	Object	There are still infrastructure implications, a reduced/nominal rate would perhaps be more appropriate than a nil rate.
Other uses Sustainable Development		A reduced rate would be appropriate for developments that were environmentally sustainable. These might include developments where energy and water use produces minimal demands, where alternative transport facilities are integrated, where SUDS, ecologically functioning green space is included.

Question 4. Do you have any evidence to support your views?

Please attach additional sheets if necessary

The rationale for the levy rate indicates that many commercial developments could contribute to a levy. The fact that the varying financial constraints make this complicated is not sufficient reason to abandon a contribution from commercial developments.

Question 5. Do you have any comments on the types of infrastructure that it is proposed will benefit from the Levy (Annex C)?

Please attach additional sheets if necessary

There is very limited mention of Green Infrastructure and Environmental Networks. Granted these subjects may be being dealt with within the Sustainable Design SPD (Part 2) but the Green Infrastructure should be given greater recognition with the CIL documentation.

While appendix 5 of the Interim Planning Guidance covers Natural & Semi-natural Open Space in some detail it does not appear in Annex C. We would strongly support a contribution to Natural & Semi-natural Open Space and would agree with an average figure of approximately £250 - £350/ha/yr.

Contribution to Natural & Semi-natural Open Space via the CIL should however be in addition to on site provision of green space, i.e. it addresses the strategic green infrastructure (wider, shared infrastructure) in the locality via habitat creation and enhancement, LNR designation, etc.

Question 6. Any other comments?

Please attach additional sheets if necessary

The Sustainable Community Strategy and the Core Strategy Spatial Vision seek to respond to climate change and enhance our natural and built environment. This should have greater recognition in the CIL as well as the LDF Implementation Plan or Place Plans. Understandably the onus is very much on the traditional infrastructure, however there is a range of social and environmental infrastructure that would benefit from greater recognition and support.

As the Levy funding is not designed for maintenance payments what policy provision is there for future maintenance of the new infrastructure? Maintenance requirements for natural open space are often underestimated and without sufficient funding to support on-going management sites can quickly lose their ecological value. Cost can be highly variable depending upon the site type, community engagement, etc. Shropshire Wildlife Trust figures range between £100 – 1000/ha/year.

Your comments will be kept for the duration of the Levy Charging Schedule process. Please note that your response cannot be kept confidential.