

Further to the consultation on the above draft documents I set out the response from Anwyll Construction Co Ltd – an active regional housebuilder operating in the Shropshire County area.

Once again we would like to commend Shropshire for the speed, quality and clarity of the documents that are being produced to provide (subject to the responses below) clear , realistic and responsive planning policy guidance for new development.

(i) CIL – Draft Charging Schedule

In general we would support the broad basis of the Charging Schedule – understanding the difficulties that are faced in attempting to be fair and realistic whilst at the same time generating funds for infrastructure.

We have concerns as follows-

- Only the housebuilding sector appears to be shouldering CIL costs. We consider that it is possible to adopt/apply a levy for commercial development – particularly large scale foodstores – many of which are very profitable – but subject to viability assessments. No beneficial development should be discouraged from investing in Shropshire – whether residential or commercial. But surely it is possible to identify a possible levy for commercial developments
- Despite previous queries it is still unclear how open space provision will be operated. There is an approved IPG for open space which could be very onerous on new developments – taking up a significant area of a development site , with additional capital and maintenance charges to bear. The eligible developments that can benefit from CIL funding include open space – so it appears that the developer is being or could be charged twice. More clarity is needed to identify when open space will be provided by either CIL or planning obligations – but not both. There is to be a Part 2 SPD on Design and Sustainability which includes recreation (and assume open space) so it is difficult to foresee the impact of this on the provision , layout , costs and viability of new development
- Sewage treatment capacity and the costs to developers has been a thorny and costly subject to developers for many years . CIL is intended to covers these costs and we would like to see clarity here as which sites/developments are covered by the CIL funding. At present water utilities throw a smokescreen over which sites have received funding/approval to charge and which have not. Developers are left at the mercy of providers if and when they claim there is insufficient capacity and no funding to increase capacity – unless developers contribute
- It is also seems unfair that a planning application submitted now may need to prove viability on one set of obligations but if planning consent is delayed – as often happens - till CIL comes into operation – then another set of costs via CIL will be levied – making the scheme potentially unviable. There needs to be interim /transitional arrangements in place to cover this distinct possibility.

(ii) SPD – Developer contributions

The key point here is the inter –relationship between the various policy documents (i) CIL Charging (ii) IPG on Open Space and (iii) this SPD on Developer contributions.

In particular open space seems to “bounce” between the 3 documents and the lasting impression is uncertainty as to what scale type and cost of open space

will be required . The IPG in effect seeks the broad equivalent of around 3.5 ha of open space in total per 1,000 population which is high.
This requirement – if applied- will generally reduce the net developable area and increase densities and decrease house prices – and adversely impact on viability.
The IPG makes a valiant effort to link requirement to existing open space provision – scale ,type , quality and accessibility . Nevertheless it difficult for a developer to work through the calculations to assess the likely scale and costs to undertake development appraisals etc.
In that sense a simplified and single source document would eliminate most uncertainty and encourage investment.

There is a Developers Panel meeting on 4th May to discuss the above documents and which I hope to attend.
Please let me know if you need any further information or assistance to enable you to consider these representations.

Regards
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