



Chartered Town Planners

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Planning Policy Team
Shropshire Council
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Dear Sirs,

RE: Community Infrastructure Levy, Draft Charging Schedule

We write in response to the current consultation with regards the above document, and set out our concerns below.

The 'Draft Charging Schedule Accompanying Notes' makes reference to the timing at which levy payments are to be made to the Council, and sets this at within 60 days from commencement of the development. We consider that to expect developers to incur additional capital expenditure at the start of a project would deter developers from investing in Shropshire and place an unnecessary burden on the already critical housing market. This charge would be especially cumbersome on small scale developers, particularly when viewed alongside the Council's recently adopted 'Type and Affordability of Housing' SPD, which also expects an affordable housing sum to be payable within 60 days of the start of the development.

Paragraph 4.4 of the 'Levy Rationale Background Paper' (18th March 2011) argues that a key test in the appropriate level of CIL is that the proposed rate "would not put at serious risk overall development in the area". In this regard we would, therefore, urge the Council to consider CIL payments to be made within 60 days of the completion of the development instead of commencement.

We trust our comments will be duly considered by the Council in progressing its Draft Charging Schedule.

Yours faithfully,

Rebecca L. Jennings
Concept Town Planning Ltd.