



Community Infrastructure Levy Regulations 2011 (amended) Preliminary Draft Charging Schedule Consultation

Response from the Norfolk Biodiversity Partnership

The Norfolk Biodiversity Partnership (NBP) welcomes this opportunity to comment on the GNDP's draft CIL charging schedule. We believe that CIL is important and that it has the potential to deliver significant community benefits, if charges are set at an appropriate level and the funds are used wisely, including for the provision of Green Infrastructure (GI).

NBP is not in a position to comment in detail on the figures discussed in the draft charging schedule. However, in general terms, we believe the suggested figures are a reasonable balance between the desirability of funding from CIL and the impact on economic viability. We also broadly support the idea of two charging zones for residential development; the suggested boundaries seem reasonable, given the likely locations and scale of proposed development within the GNDP area. We would particularly like to give our support to the idea that Community Uses will not be subject to a CIL charge under the proposals.

However, in this context, we would wish to make some comments on how the CIL money will be spent. We strongly believe that a proportion of the funds generated through CIL should be spent on GI and we set out the case for this below.

The Case for Biodiversity Actions through CIL:

Whilst developers are required to consider protected species and Biodiversity Action Plan habitats and species within the development footprint, they rarely consider the wider effects of the development on biodiversity in the landscape. Increasingly, the lack of a wider perspective on effects on biodiversity from larger developments is being recognised as a significant omission.

Developments which result in a significant increase in the size of a town or parish all have the potential to affect habitats and biodiversity adversely in the local area outside the development footprint. These indirect effects may include pollution of air and water, hydrological impacts, disturbance, increased risk of vandalism, fires and fly tipping, unregulated access, ancillary development and operations (such as access roads and dredging) and the displacement of individuals and populations of species leading to increased pressure on other sites. These factors may be compounded by the cumulative effects from a number of developments. Climate change may also further increase the significance of such issues.

These indirect effects are often poorly addressed in determining planning applications and their significance is often not recognised or acknowledged by decision makers. Nevertheless, such effects may be as harmful to the biodiversity of a locality as direct loss. GI funding through CIL is an important delivery method to address this issue.

Potential Green Infrastructure Projects through CIL:

To ensure that the existing biodiversity assets are protected for their intrinsic value and for the role they play in ecosystem services and the health and wellbeing of local residents, it will be necessary to increase the resilience of assets in the locality. GI project activities could include, for example, the provision of

- New alternative areas for public access, to reduce pressure on existing semi-natural habitats;

- Buffer habitat adjacent to existing semi-natural habitats and sites;
- Infrastructure in the form of fences or ditches to restrict access to sensitive habitats and sites;
- New habitats to compensate for the indirect loss from development and the cumulative effects of other proposed and potential development;
- Restoration and/or improved management of existing semi-natural habitats in the vicinity.

These projects will be necessary around all areas of significant developments, including Market Towns and Key Service Centres – not just around the two main growth areas of south-west and north-east Norwich.

Policy Background:

- Planning Policy Statement 9 requires local planning authorities to ensure that development does not result in loss of biodiversity; this principle is also to be included within the NPPF. Although not explicitly stated, this must include the wider indirect and cumulative effects on biodiversity.
- Policy 1 of the GNDP's Joint Core Strategy (*Addressing climate change and protecting environmental assets*) places a strong emphasis on both safeguarding *and* enhancing biodiversity. The aspirations of this policy require addressing through spatial planning, the development control process and through other delivery methods. In support of this policy, the JCS includes a County-wide Ecological Network Map to help direct action.
- Policy ENV5 of the Broadland Local Plan provides additional weight to this. It states, "Particular importance will be attached to...features which provide or contribute to "reserves" or "corridors" for wildlife...".
- Section 5.5 of Policy 1 of the Joint Core Strategy states that, "Investment and development will provide a multi-functional network of green spaces and green links, having regard to factors such as accessibility, existing and potential open spaces, natural and semi-natural areas, protection of the water environment, landscape, geodiversity and the fundamental need to contribute to ecological networks". The reference to investment in this policy is obviously crucial.
- The GNDP has produced a Green Infrastructure Strategy which recognises the importance of biodiversity for its own sake and for the contribution it plays in ecosystem services and the health and wellbeing of local residents.

To help meet the aspirations of these policies, it is reasonable and appropriate that there should be a significant Green Infrastructure contribution from CIL.

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