

Shropshire Hills AONB Partnership

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26th May 2015

Dear Helen,

Reform of the Landfill Communities Fund Consultation

Please find enclosed the Shropshire Hills AONB Partnership's response to the Reform of the Landfill Communities Fund Consultation. I trust this is acceptable.

Yours sincerely

Mike Kelly

Natural Environment Officer

Q1: What impact do you envisage an 18 month spending requirement having on your organisation's ability to fund or complete projects using LCF funds?

18 months is not sufficient time period to allow any meaningful project work to be completed. Most practical projects associated with protected sites or protected species require a period of preparatory work with landowners and then a period for consents or licences to be approved. Furthermore, such projects may require the recruitment of a dedicated Project Officer. An 18 month contract would be a disincentive that would dissuade quality candidates.

Q2: At what point should LCF funds be considered 'spent'?

No Comment

Q3: Would reducing the landfill operator's entitlement to a tax credit in line with the amount of unspent funds held by an EB have a significant impact on the likelihood of the landfill operator to continue to contribute to the LCF? Would this also impact EB's incentives to spend funds?

No Comment

Q4: How would a 7.5% cap on administrative costs affect your organisation's involvement with the LCF?

As applicants to the LCF, the 11% Third Party Contribution has been difficult to find. If it were not for the goodwill of partner organisations we would not have been able to raise such a sum from internal resources. We believe such a level provides a disincentive for organisations such as ours working to deliver the biodiversity and societal benefits that are not available through agri-environment schemes.

We would add that consideration should be given for LCF funding to be available to cover a proportion of the applicants administrative/management costs. Whilst we welcome the opportunities LCF funding bring there is little provision to cover for the additional workload from existing core funds.

Q5: What is an appropriate threshold below which the 7.5% cap on administrative costs should not apply?

For major projects our organisation would find it difficult to raise even a 7.5% contribution. As with Q4 we are entirely reliant on partner organisations to facilitate this contribution. With increasing fiscal pressures this may become increasingly difficult for partners to facilitate.

Q6: What should administrative costs be comprised of?

No Comment

Q7: Should monies put aside for wind-up costs be included within the 7.5% cap on admin costs? If not, why not?

No Comment

Q8: How should the cap be applied to EBs who are in the process of winding up?

No Comment

Q9: Do you think licensing would place a significant burden on your organisation? If so, why?

No Comment

Q10: What set measurable standards should EBs who receive funds directly from a landfill operator be required to meet?

No Comment

Q11: Have you made significant use of investments using LCF funds? If so, please provide details.

No Comment

Q12: To what extent would removal of the LCF investment provisions hamper your ability to deliver LCF projects? Please give details.

No Comment

Q13: Would the removal of Object F from the Landfill Tax Regulations 1996 cause significant problems for your organisation? If so, why?

No Comment

Q14: What are your views on the requirements to monitor and keep records on assets purchased through LCF funding in perpetuity?

No problem with keeping records, but we question the need for perpetuity. Not sure what organisation, however established can say they will be operational in perpetuity. Furthermore, we question whether this is practical for assets that degrade over time or have a finite working life.

Q15: Are there any other LCF policy areas that need simplifying or reviewing?

No Comment

Q16: Are there any further reforms of the LCF you think are required? If so, please give details.

No, but we think it is important state how LCF has made a difference to our community:

Our project was *"Improving the Conservation Status of the Freshwater Pearl Mussel Targeting Clun SAC and Upstream Waters"* We received £119,000 of LCF money, which was vital to the project's success.

Without the LCF our project wouldn't have happened and we would not be able to make an important contribution to the reversing the decline of a "critically endangered" species and for one the UK has special responsibility.

Having a LCF funded project dedicated to conserving the freshwater pearl mussel enabled us to attract significant grants from other funders to more than double the output of our project.

Our key project outputs included:

- Fragmented riparian habitat conserved
 - Riparian buffer strips established
 - Diseased and over-mature riparian woodland managed
 - Over 2000 Trees planted
 - Revetment to control accelerated erosion
 - Debris dams removed
- Improved watercourse crossings
- Sustainable livestock watering solutions
- Rural SuDS schemes established to help control diffuse pollution
- Upland wetland restoration pilot
- Highway sediment scoping study
- Himalayan balsam survey and pilot control project
- 1 householder advice leaflet produced
- 89 volunteers involved
- 25 community events
- 46 local businesses supported

Furthermore, our landscape is affected by many old landfill sites and a waste transfer facility nearby. We believe LCF funds gives the opportunity for our community to be compensated for this.

Q17: Do you think these measures would impact disproportionately on those with protected characteristics (as defined under the Equality Act 2010)?

No Comment