

Community Infrastructure Levy Draft Charging Schedule Consultation



List of responses (Surname / Organisation name beginning L - R)

This document sets out responses submitted to the consultation on the Community Infrastructure Levy Draft Charging Schedule, which was undertaken between 10 July and 21 August 2020.

You can scroll through the responses or click on a name below to view a particular response.

Personal details including postal address, signatures and email addresses of individual respondents have been removed.

Lansley, Caryl (1)	Nelson, Steve
Lansley, Caryl (2)	Nolan, Peter and Jane
Lee, Penelope	Norris, Peter
Lewis, Jeremy	North Witney Action Group
Maclean, Andy	Oxfordshire County Council
March, Marika	Perigo, John and Brenda
Mason, Janet	Pitchforth, Nigel
Mason, Pauline	Plumbe, Richard and Pauline
Mason, Trevor	Powell, Jonathan
McCubbin, Ian	Provins, Jacqueline
McEwen, David	Pulvertaft, Sarah
Meeson, Alison	Rand, Linda
Meeson, David	Rees, Kev
Menage, Nicola	Renny-Smith, Anne-Marie
Miller, Jolene	Roberts, Jenny
Mollington, Geraldine	Robinson, Issy
Moore, Dr Jonathan	Roe, Jo
Motley, Katie	Rose, Nigel
Musson, David	Rowett, Alfred
Nellist, James	Rowett, Dr Lewis

From: Caryl Lansley [REDACTED]
Sent: 20 August 2020 11:03
To: Planning Policy (WODC)
Subject: Fwd: Objection to Zero Rated CIL

I wish to register my objection to this proposal which I believe will inevitably result in the loss of community infrastructure. I also object to the exclusion of local community involvement from infrastructure spending decisions. Money from CIL is important to Town and Parish Councils in that it gives local communities a say in spending priorities as per Neighbourhood Plans.

Yours sincerely,

Mrs Caryl Lansley [REDACTED]

From: Caryl Lansley [REDACTED]
Sent: 05 August 2020 13:36
To: Planning Policy (WODC)
Subject: ZERO-RATED CIL

I wish to register my objection to West Oxfordshire District Council proposal to abolish the Community Infrastructure Levy (CIL) from North and East Witney.

I fully support my Parish Council in Hailey in their objection to this proposal. I object to the exclusion of local community involvement from infrastructure spending decisions resulting from the inevitable loss of a Community Infrastructure Levy.

Caryl Lansley

Tel: [REDACTED]

17th August 2020

Mr Chris Hargraves
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

Dear Mr Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Penelope A Lee
[REDACTED]

[REDACTED]

From: Jeremy Lewis [REDACTED]
Sent: 15 August 2020 15:55
To: Planning Policy (WODC)
Subject: CIL proposals re North and East Witney

Dear Sirs,

I am greatly dismayed that the Council is planning to abandon the CIL on these two proposed developments. I write on behalf of myself AND my wife.

I have some considerable experience of substantial housing developments around Cambridge as well as smaller ones in the north east.

These are my points which stand alone.

1. Developers will always claim there is no money to be made. They employ the very best negotiators, better I suggest than WODC. For this reason you should take their protestations with a pinch of salt.
2. This levy is a once in a lifetime one for the locality, established by central government who want it to be a useful source of funding. To abandon therefore seems madness.
3. We hear that despite approval of previous calculations, they have now been revised because of lower house prices. If house prices are falling surely demand is not there and the development is unnecessary.
4. You don't need me to tell you of the inadequacy of local infrastructure to cope with current let alone future traffic.
5. You don't need me to tell you of the constant erosion of green areas in West Oxfordshire, we need no more houses, if they are vital we must have the CIL funds to improve amenity.
6. Hailey Parish Council tell us that house prices in your calculation have increased not fallen.

I urge you not to be hoodwinked by the developers.

Yours faithfully

Jeremy Lewis
B Sc econ., FCA (ret'd) FNIAB

[REDACTED]
Sent from AOL Mobile Mail
Get the new AOL app: mail.mobile.aol.com

From: [REDACTED]
Sent: 21 August 2020 15:52
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Churchill, a village approx.. 3 miles from Chipping Norton), I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town significantly and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town. I am particularly concerned re pollution levels from the increased traffic and the affect on community services such as schools and the medical services.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Andrew Maclean

A large, solid black rectangular redaction box covering the signature area.

[REDACTED]

From: Marika March [REDACTED]
Sent: 07 August 2020 17:05
To: Planning Policy (WODC)
Subject: Cil

I would like to raise my objection to the proposal to abolish the Community Infrastructure levy.
Marika March

Sent from my iPad

[REDACTED]

From: Janet Mason [REDACTED]
Sent: 19 August 2020 15:58
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Increasing the size and population of the town so significantly will massively increase the pressure on the town's facilities, such as the health center, school's community services, open spaces and recreation facilities. It will also result in increased traffic and resulting in increased pollution levels. The town council will need to be able to work to mitigate some of the issues that will arise and of course will need the funds to do this, hence the need for the CIL money to not be waived but to go to the town council.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Janet Mason

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sent from my iPhone

[REDACTED]

From: Pauline Mason [REDACTED]
Sent: 18 August 2020 17:20
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

As I work at the local Health Centre I am aware that increasing the size and population of the town so significantly will massively increase the pressure on the town's facilities, such as our health centre, our school's community services, open spaces and recreation facilities. It will also result in increased traffic and resulting in an increased pollution levels.

The town council will need to be able to work to mitigate some of the issues that will arise and of course will need the funds to do this, hence the need for the CIL money to not be waived but to go to the town council.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Pauline Mason
[REDACTED]

[REDACTED]

From: Trevor Mason [REDACTED]
Sent: 15 August 2020 10:11
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Increasing the size and population of the town so significantly will massively increase the pressure on the town's facilities, such as the health center, school's community services, open spaces and recreation facilities. It will also result in increased traffic and resulting in increased pollution levels. The town council will need to be able to work to mitigate some of the issues that will arise and of course will need the funds to do this, hence the need for the CIL money to not be waived but to go to the town council.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Trevor Mason

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 18 August 2020 12:08
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response - for the East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town. It is especially important to ensure that the potential funds available from the CIL are accessed at a time when the basis for such funding is now called into question by the Government's recent proposals for the planning system as a whole (through the possible replacement of CIL and Section 106 agreements by an Infrastructure Levy).

There are a number of issues of concern that could arise through this extensive new development, such as the relationship between increased traffic and pollution, health service provision, and the connection between this development and the long-term future of adjacent open space and recreation areas (such as Chipping Norton's William Fowler Memorial Wood, adjacent to Shakespeare's Way and the allotments). It seems entirely appropriate for CIL funding to be available and to be used to help address issues such as these.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Ian McCubbin

[REDACTED]

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

(You could insert examples of issues that particularly concern you, for example: pollution levels, increased road traffic, need for improved access to health services, to community services, access to open space and recreation facilities).

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Surely this whole "Vision Statement" document is now redundant with the new planning regulations?

Yours sincerely

[Redacted signature area]

From: [REDACTED]
Sent: 20 August 2020 10:26
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Re: CIL consultation response/ East Chipping Norton Development

Dear Mr Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure, particularly healthcare provision and services for the very young and elderly. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Alison Meeson
[REDACTED]

[REDACTED]

From: Mark Meeson [REDACTED]
Sent: 20 August 2020 10:49
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear MrHargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Of particular concern are healthcare and education provision, as the local area is already overstretched.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Mark Meeson

[REDACTED]

Sent from my iPad

[REDACTED]

From: Nicola Menage [REDACTED]
Sent: 14 August 2020 16:37
To: Planning Policy (WODC); Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

[REDACTED]
[REDACTED]

14th August 2020

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned indeed to learn that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our beautiful Cotswold town considerably and will increase considerable pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Not only does the area already need increased services for the young, elderly and disabled, but there is clearly a sewage issue in the town which will need to be addressed - especially if increasing the town's population by 1/3.

As a resident of Spring Street the sewage smell can be most unpleasant and a considerable health hazard.

To pay the CIL, is only fair to Chipping Norton as a town, and community.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – I understand that this is what those living in Chipping Norton were promised when this significant development was originally proposed.

I look forward to hearing from you.

Yours sincerely,

Nicola Ménage



Sender notified by
[Mailtrack](#) ...



[REDACTED]

From: Jolene Miller [REDACTED]
Sent: 14 August 2020 15:15
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: Community Infrastructure Levy (CIL) Tank Farm development

Dear Mr Hargraves

I am writing to you concerning the East Chipping Norton development site and the suggestion that it could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. I totally understand that houses need to be built to keep the economy moving but it cannot be at the expense of residents best interests, which WODC has a duty to consider.

The major concern for myself, my husband and our young children (8) and (5) is the worsening situation with regards to accessing healthcare in the town. Over the past 3 years, access to GP's and appointments has become a real issue. It's akin to the problems which have been experienced in other large towns and cities. Adding more housing without addressing this will compound the situation.

We live on the new Bellway estate and there were promises of open spaces and a park area but quite honestly the finished article is substandard. The open spaces are peppered with rocks, overgrown areas passed off as "wild flower" borders. There are no litter bins in the park, no benches, no dog litter bins, the flooring leaves black marks on the children and their clothes, just very disappointing.

We live in an area where we pay considerable amounts of council tax and it concerns me that any costs to improve infrastructure, if not charged to the developers, will be passed to the residents. I am a divorce lawyer in West London and I staggered by how much council tax we pay in comparison to cases I deal with in Bucks and London. In some cases 50% higher in equivalent value properties.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate the growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed. Perhaps a half way compromise can be found?

Yours sincerely

Jolene Miller
[REDACTED]

Sent from Jo's iPhone

Thursday 20th August 2020

To W.O.D.C. Witney Oxfordshire

Dear Sirs and Madams,

Chipping Norton Town Council have informed me that Developers should pay a Community Infrastructure Levy (CIL) which can help with some smaller costs, but that W.O.D.C are proposing to waive it for this project, 'The East Chipping Norton Development'.

This seems grossly unfair and unreasonable. I hope you will reconsider this as there will be many, many small things Chipping Norton will have to deal with.

Yours Sincerely,

Geraldine Mollington (Mrs)

[REDACTED]

From: Dr Jonathan Moore [REDACTED]
Sent: 20 August 2020 14:24
To: Planning Policy (WODC)
Cc: Catherine Elliott
Subject: CIL consultation response/ East Chipping Norton
Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

As a local GP I do have concerns as to the extra pressure that this development will have on the Health Centre. Staff recruitment is already very difficult and a further increase in the list size without significant investment could make it considerably more difficult for both staff and patients. I would be grateful if you can explain how this demand will be met.

I also support the schools and imagine the same dilemma applies. What are the plans for the schools.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Dr Jonathan Moore

[REDACTED]

[REDACTED]

From: Katie Motley [REDACTED]
Sent: 20 August 2020 14:11
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

I am particularly concerned about pollution levels, increased road traffic, the need for improved access to health services, to community services, as well as access to open space and recreation facilities.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely,

Katie Motley

[REDACTED]
[REDACTED]
[REDACTED]

From: David Musson [REDACTED]
Sent: 21 August 2020 14:09
To: Planning Policy (WODC)
Cc: GrahamKnaggs; Kieran Mullins; Gill Hill
Subject: Objection to Zero-Rate Community Infrastructure Levy

To Planning Policy Team, CIL Consultation

I write to register my strong objection to WODC's current proposal to set the Community Infrastructure Levy to Zero on the current Strategic Development Areas, and in particular in North Witney (much of which is located in Hailey Parish). This is an issue of major concern, and far-reaching consequences for the district.

I fully support the submission made by Hailey Parish Council objecting to the Zero-Rated CIL which outlines the general background, scrutinizes the figures and processes of WODC.

I have lived in Hailey for over 25 years, and have served on Hailey Parish Council for 12 years, including 6 years as Chairman. I was also a member of the group who produced the Hailey Neighbourhood Plan. With active encouragement from WODC, and in the spirit of the Localism Act and its objective of local and community involvement in planning decisions, we worked hard over several years to produce our Neighbourhood Plan which was overwhelmingly supported by parishioners in the referendum, and accepted by WODC.

The current proposals of WODC negate and ride roughshod over the aspirations and hard work of local communities to involve themselves in local planning matters.

This is to say nothing of the potential damage a Zero Rated CIL will do to the future quality of life of the citizens of Witney and West Oxfordshire more generally. When there is any discussion of the extensive house building taking place and planned for the area, a very common reaction is that there is insufficient infrastructure; and inadequate social and community facilities to match the scale of house building and population growth – to say nothing of potential impact on the environment. Indeed WODC itself has identified a huge infrastructure funding gap across West Oxfordshire of £200 million

The CIL was intended to address this issue, and to do so in a way that combined public and private engagement. For WODC to now turn its back on this is extraordinarily short sighted, and a shameful betrayal of its own prior commitments and policy, and more importantly of the citizens of West Oxfordshire, completely disenfranchising the associated Town and Parish Councils from involvement in the allocation of CIL funding.

In the strongest possible terms I urge WODC to re-consider proposals for a Zero Rated CIL, address the objections and details raised by Hailey Parish Council and others, and bring forward proposals that will ensure properly funded, community supported infrastructure for future generations.

Yours sincerely

David Musson
[REDACTED]

Submitted by James Nellist, 21-August-2020:

In this representation I respectfully urge West Oxfordshire District Council to re-consider and reduce the introduction of such a high rate of CIL charge for 1 to 10 dwellings. I submit that viability appraisals based upon more realistic construction costs show how the charge, at the level proposed, would adversely impact the viability of "Small Scale Infill" residential development sites (1 to 10 dwellings). And, as proposed the CIL charge rate would, I argue, hinder the ability of the smaller local construction sector to deliver sustainable houses in the town and large village sites within the district. However, these small ideally located sites are key to policies CO1 and CO11 in the West Oxfordshire Local Plan 2031 for improving the quality of life of local communities and maximising opportunities for walking, cycling and use of public transport while minimising the need to travel, particularly by car.

The West Oxfordshire CIL Draft Charging Schedule (March 2020) is, as currently proposed, excessively high for 1 to 10 dwelling developments and would adversely impact the viability of "Small Scale Infill" residential development sites (1 to 10 dwellings) in the district and would hinder the ability of the local small construction sector to deliver houses. West Oxfordshire District Council states on its own website states that *"It is important that CIL rates (in £ per square metre) are set at a level that does not hinder new development coming forward"*. However, the high CIL rate of £200 to £300 per square meter for 1 to 10 dwelling developments would hinder "Small Scale Infill" sites coming forward because the construction cost rate of £1,154 per square metre (psm) used in the viability appraisals of "Small Scale Infill" sites is unrealistically low and would make the delivery of these sites unviable.

The viability appraisals provided (within the West Oxfordshire District Council Community Infrastructure Levy Viability Assessment, authored by NCS and dated January 2020) are flawed as they make no distinction between the construction costs for 'Small Scale Infill' (scenario given as one-off development of 5 dwellings) and large estate developments with 100 or more houses.

The viability appraisals (within the CIL Viability Assessment) adopt an unrealistic one-size-fits-all 'median' construction cost rate of £1,154 psm that does not reflect the construction costs locally for 'Small Scale Infill' sites (that are typically 1 to 5 dwellings but up to 10 dwellings) and are delivered by the smaller local construction sector who have much higher psm construction costs. The "Basis of Costs" section, paragraph numbered 3 on page 3 of the Construction Cost Study, within the Viability Assessment report offers explanation by stating that:

"The report recognises that different types of construction company incur different levels of costs due to differences in buying power, economies of scale etc. The rates assume that substantial new residential development (House and Bungalows) will be undertaken primarily by regional and national house builders and the adopted rates reflect this. The adopted rates therefore tend to fall below median BCIS construction rates which cover building cost information from all types of construction company to individual builders, BCIS does not capture data from regional and national housebuilders. This is considered to be a more realistic approach than the adoption of median general rates, to reflect the mainstream new build residential development particularly since smaller schemes undertaken by smaller scale construction companies will enjoy exemption from zero carbon and affordable housing requirements." [Emphasis added]

I think it is nonsensical to apply an estate housing construction cost rate to the 'Small Scale Infill' scenarios detailed in the viability appraisals provided in the CIL Viability Assessment report. Adopting an unrealistic low construction cost rate of £1,154 psm (based on regional and national house builders building housing estates) for 'Small Scale Infill' sites renders the viability appraisals invalid. Moreover, justifying this unrealistic low construction cost rate as offset by *"exemption from zero carbon and affordable housing requirements"* without any supporting data or sensitivity analysis cannot be valid either.

Whilst large estate housing are likely to deliver the bulk of new housing in the district the smaller development sites still represent a very important element of the housing that needs to be delivered. They offer the best

opportunities for high quality, sustainable houses to be built within towns and larger villages (service centres) where their residents are likely to be less reliant on car usage within the district.

Reducing car use and high-quality design are both key policies of the West Oxfordshire Local Plan 2031:

- Policy CO1: *“Enable new development, services and facilities of an appropriate scale and type in locations which will help improve the quality of life of local communities and where the need to travel, particularly by car, can be minimised.”* [Emphasis added]

New housing that minimises the need to travel, particularly by car, will arguably be within towns and larger villages locations and are most likely to be delivered by smaller 1 to 10 dwelling sites coming forward.

- Policy CO11: *“Maximise the opportunity for walking, cycling and use of public transport.”*

New housing that maximises the opportunity for walking and cycling will arguably be within towns and larger village locations and are most likely to be delivered by smaller 1 to 10 dwelling sites coming forward.

- Policy OS4 High quality design: *“High design quality is central to the strategy for West Oxfordshire.”*

New housing of a high design quality within towns and larger villages locations that are delivered from smaller 1 to 10 dwelling sites simply cannot be built for the same construction cost rate as large housing estates.

The CIL rate as currently proposed for 1 to 10 dwelling sites is excessively high and will adversely impact the viability of ‘Small Scale Infill’ sites because the construction cost rate used is too low. Below I wish to illustrate the impact of using an unrealistic estate housing construction rate has on the Viability Appraisals for ‘Small Scale Infill’ scenarios provided in the CIL Viability Assessment report by the council.

The CIL Viability Appraisal document provides many pages of spreadsheets giving appraisals for residential scenarios. The pagination (page breaks) of the spreadsheets makes them difficult to review but in summary they use the following construction cost rate assumptions:

Scenario	Scenario Development Size	House Construction Cost Rate applied to 2020 appraisals
Small Scale Infill	5 dwellings	£1,154 psm
Small Scale Mixed Housing	11 dwellings	£1,154 psm
Medium Scale	25 dwellings (incl 5 apartments)	£1,154 psm
Intermediate Scale	50 dwellings (incl 7 apartments)	£1,164 psm (additional £10 to reflect the Council’s policy on Adaptable & Accessible Dwellings on schemes of 50+ units)
Large Scale	100 dwellings (incl 50 apartments)	£1,164 psm (additional £10 to reflect the Council’s policy on Adaptable & Accessible Dwellings on schemes of 50+ units)

By applying this one-size-fits-all and too low rate of £1,154 psm, (based on regional and national house builders constructing housing estates) to the ‘Small Scale Infill’ appraisals the council is making the case that the proposed

CIL charge rates are viable – but the viability appraisals are grossly flawed. My experience and feedback from local construction professionals is that the construction costs locally are considerably higher than £1,155 psm for smaller developments.

However, rather than proposing a construction cost rate may I suggest using the councils own 2013 construction cost rates (but adjusted for inflation) previously submitted for CIL examination (in its 2013 CIL Viability Study authored by Apsinall Verdi and dated September 2013) as a “sense check”. The construction costs rates submitted by the council in this report were:

- £1,100 psm for ‘One-off’ housing (specifically applied to 5 dwelling development typologies) in medium value areas of the district, and
- £838 psm for estate housing (applied to 15 or more house development typologies) in medium value areas of the district.

These construction costs from the 2013 CIL Viability Assessment were widely criticised, at the time, by representations from the local construction sector as being too low. They were also criticised for having construction costs that varied between low, medium and high value areas of the district. However, if you put these criticisms to one side and use the 2013 construction cost rates for illustrative purposes it can be seen that the construction costs used for the “Small Scale Infill” appraisals in the current 2020 CIL Viability Assessment compared to the 2013 construction costs are unrealistically low.

To allow for inflation these 2013 construction costs (£1,100 psm for ‘One-off’ housing and £838 psm for estate housing) can be adjusted using the BCIS All-in Tender Price Index (typically used to calculate CIL inflation) to calculate an equivalent 2020 construction costs using the following formula:

$$\text{Construction Cost Rate 2020} = \text{Construction Cost Rate [WODC Sept 2013]} \times \left\{ \frac{334 [\text{Oct 2019 BCIS All in TPI}]}{234 [\text{Sept 2013 BCIS All in TPI}]} \right\}$$

Using this calculation provides the following comparatives:

	2013 CIL VA Construction Cost	2020 CIL VA Construction Cost	Calculation of 2020	2020 Calculated Construction Cost	Comparison
Small Developments (up to 5 dwelling)	£1,100 psm	£1,154 psm	$\frac{£1,100 \times (334/234)}$	£1,570 psm	36.0% Disparity
Estate Developments (15 or more dwelling)	£838 psm	£1,154 psm	$\frac{£838 \times (334/234)}$	£1,196 psm	3.6% Similar

The table shows that the construction cost rate for Estate Developments (on row 2) to be very comparable between the inflation adjusted 2013 Construction Cost at £1,196 psm and the 2020 CIL Viability Assessment assumed Construction Cost at £1,154 psm. The closeness of the two figures appears to strongly support the inflation adjustment methodology used in this submission.

However, the table shows (on row 1) that the construction cost rate for Small Developments calculated as £1,570 psm (when adjusted for inflation) is far higher than the £1,154 psm rate used in the current 2020 CIL Viability Assessment report for “Small Scale Infill” scenarios.

The table clearly shows that the unrealistic £1,154 psm rate used in the current Viability Assessment report for Small Developments may be applicable to regional and national house builders constructing large housing estates but is far too low for “Small Scale Infill” development.

A rate of £1,570 psm for Small Developments would be far more realistic. From my experience and feedback from local construction professionals it is still low. However, if the conservative £1,570 psm rate is applied to the Viability Appraisals the impact is devastating on the viability of 'Small Scale Infill' scenarios.

Please see below three spreadsheets showing the unrealistic 2020 construction cost rates compared with the more realistic 2013 (adjusted for inflation using BCIS TPI) construction cost rates for these three Small Scale Infill (Brownfield) scenarios:

Residential Viability Appraisal Comparison

Comparison of Construction Costs: 2020 CIL VA v. 2013 CIL VA

Small Scale Infill (Brownfield) in Low Value Area

2020 CIL Viability Appraisal						2013	
DEVELOPMENT SCENARIO		Small Scale Infill		Apartments	0		0
BASE LAND VALUE SCENARIO		Brownfield		2 bed houses	2		2
DEVELOPMENT LOCATION (ZONE)		Low		3 Bed houses	2		2
DEVELOPMENT DETAILS		5 Total Units		4 bed houses	1		1
Affordable Proportion	0%	0 Affordable Units		5 bed house	0		0
Affordable Mix	33%	Intermediate	0%	Social Rent	67%	Affordable Rent	
Development Floorspace		460 Sqm Market Housing		0 Sqm Affordable Housing			
Development Value							
Market Houses							
0 Apartments	50	sqm	3500	£ per sqm	0	£	-
2 2 bed houses	75	sqm	3400	£ per sqm	150	£	510,000
2 3 Bed houses	90	sqm	3300	£ per sqm	180	£	594,000
1 4 bed houses	130	sqm	3200	£ per sqm	130	£	416,000
0 5 bed house	155	sqm	3200	£ per sqm	0	£	-
Total SQM				460			
Intermediate							
		65%	Open Market Value				65%
0 Apartments	50	sqm	2275	£ per sqm		£	-
0 2 bed houses	75	sqm	2210	£ per sqm		£	-
0 3 Bed houses	90	sqm	2145	£ per sqm		£	-
Social Rent							
		40%	Open Market Value				40%
0 Apartments	50	sqm	1400	£ per sqm		£	-
0 2 bed houses	75	sqm	1360	£ per sqm		£	-
0 3 Bed houses	90	sqm	1320	£ per sqm		£	-
Affordable Rent							
		50%	Open Market Value				50%
0 Apartments	50	sqm	1750	£ per sqm		£	-
0 2 bed houses	75	sqm	1700	£ per sqm		£	-
0 3 Bed houses	90	sqm	1650	£ per sqm		£	-
5 Total Units							
Development Value						£ 1,520,000	£ 1,520,000
Development Costs							
Land							
Apartments	0	Plots	20403	£ per plot		£	-
2 bed houses	2	Plots	51008	£ per plot		£	102,016
3 Bed houses	2	Plots	58294	£ per plot		£	116,588
4 bed houses	1	Plots	81612	£ per plot		£	81,612
5 bed house	0	Plots	10215	£ per plot		£	-
Total Land						£ 300,216	£ -
SDLT						£ 4,511	£ 5,935
Construction							
Apartments	1946.95	£ per sqm	-	Market Housing Construction Cost	£ 530,840	£ 1946.95	£ 722,200
2 bed houses	1154	£ per sqm	173,100	Affordable Housing Construction Cos	£ -	£ 1570	£ -
3 Bed houses	1154	£ per sqm	207,720			£ 1570	
4 bed houses	1154	£ per sqm	150,020			£ 1570	
5 bed house	1154	£ per sqm	-			£ 1570	
Additional Affordable Housing Land Cost							
Professional Fees		8%	Build Cost		£ 42,467		£ 57,776
Legal Fees		0.5%	GDV		£ 7,600		£ 7,600
Statutory Fees		1.1%	Build Cost		£ 5,839		£ 7,944
Sales/Marketing Costs		2.0%	Market Units Value		£ 30,400		£ 30,400
Contingencies		5.0%	Build Cost		£ 26,542		£ 36,110
Planning Obligations		1500	£ per Market Unit		£ 7,500		£ 7,500
Interest	5.0%	12	Month Build	6	Mth Sale	£ 48,986	£ 48,986
Arrangement Fee	1.0%	Cost			£ 9,484	£ 1.0%	£ 9,484
Development Profit	Market Hsg	20.0%	of GDV	Aff Hsg	6.0%	of Cost	£ 304,000
Total Cost						£ 1,318,385	£ 1,538,151
VIABILITY MARGIN						£ 201,615	£ (18,151)
POTENTIAL CIL RATE PER SQ METRE OF MARKET HOUSING (IF APPLICABLE)						£ 438	£ (39)

Residential Viability Appraisal Comparison

Comparison of Construction Costs: 2020 CIL VA v. 2013 CIL VA

Small Scale Infill (Brownfield) in Medium Value Area

2020 CIL Viability Appraisal						2013		
DEVELOPMENT SCENARIO		Small Scale Infill		Apartments	0		0	
BASE LAND VALUE SCENARIO		Brownfield		2 bed houses	2		2	
DEVELOPMENT LOCATION (ZONE)		Medium		3 Bed houses	2		2	
DEVELOPMENT DETAILS		5 Total Units		4 bed houses	1		1	
Affordable Proportion	0%	0 Affordable Units		5 bed house	0		0	
Affordable Mix	33%	Intermediate	0%	Social Rent	67%	Affordable Rent		
Development Floorspace	460 Sqm Market Housing		0 Sqm Affordable Housing					
Development Value								
Market Houses								
0 Apartments	50	sqm	3800	£ per sqm	0	£	-	
2 2 bed houses	75	sqm	3600	£ per sqm	150	£	540,000	
2 3 Bed houses	90	sqm	3500	£ per sqm	180	£	630,000	
1 4 bed houses	130	sqm	3400	£ per sqm	130	£	442,000	
0 5 bed house	155	sqm	3400	£ per sqm	0	£	-	
Total SQM				460				
Intermediate	65%	Open Market Value						
0 Apartments	50	sqm	2470	£ per sqm		£	-	
0 2 bed houses	75	sqm	2340	£ per sqm		£	-	
0 3 Bed houses	90	sqm	2275	£ per sqm		£	-	
Social Rent	40%	Open Market Value						
0 Apartments	50	sqm	1520	£ per sqm		£	-	
0 2 bed houses	75	sqm	1440	£ per sqm		£	-	
0 3 Bed houses	90	sqm	1400	£ per sqm		£	-	
Affordable Rent	50%	Open Market Value						
0 Apartments	50	sqm	1900	£ per sqm		£	-	
0 2 bed houses	75	sqm	1800	£ per sqm		£	-	
0 3 Bed houses	90	sqm	1750	£ per sqm		£	-	
5 Total Units								
Development Value					£ 1,612,000		£ 1,612,000	
Development Costs								
Land								
Apartments	0	Plots	22338	£ per plot		£	-	
2 bed houses	2	Plots	55845.5	£ per plot		£	111,691	
3 Bed houses	2	Plots	63823.5	£ per plot		£	127,647	
4 bed houses	1	Plots	89353	£ per plot		£	89,353	
5 bed house	0	Plots	111691	£ per plot		£	-	
Total Land					£ 328,691	£	-	
SDLT						£	5,935	
Construction								
Apartments	1946.95	£ per sqm	-	Market Housing Construction Cost		£	530,840	
2 bed houses	1154	£ per sqm	173,100	Affordable Housing Construction Cos		£	-	
3 Bed houses	1154	£ per sqm	207,720					
4 bed houses	1154	£ per sqm	150,020					
5 bed house	1154	£ per sqm	-					
Additional Affordable Housing Land Cost							£	-
Professional Fees	8%	Build Cost				£	42,467	
Legal Fees	0.5%	GDV				£	8,060	
Statutory Fees	1.1%	Build Cost				£	5,839	
Sales/Marketing Costs	2.0%	Market Units Value				£	32,240	
Contingencies	5.0%	Build Cost				£	26,542	
Planning Obligations	1500	£ per Market Unit				£	7,500	
Interest	5.0%	12	Month Build	6	Mth Sale	£	51,399	
Arrangement Fee	1.0%	Cost				£	9,806	
Development Profit	Market Hsg	20.0%	of GDV	Aff Hsg	6.0%	of Cost	£ 322,400	
Total Cost					£ 1,371,719		£ 1,590,061	
VIABILITY MARGIN					£ 240,281		£ 21,939	
POTENTIAL CIL RATE PER SQ METRE OF MARKET HOUSING (IF APPLICABLE)					£ 522		£ 48	

Residential Viability Appraisal Comparison

Comparison of Construction Costs: 2020 CIL VA v. 2013 CIL VA

Small Scale Infill (Brownfield) in High Value Area

2020 CIL Viability Appraisal						2013	
DEVELOPMENT SCENARIO		Small Scale Infill		Apartments	0		0
BASE LAND VALUE SCENARIO		Brownfield		2 bed houses	2		2
DEVELOPMENT LOCATION (ZONE)		High		3 Bed houses	2		2
DEVELOPMENT DETAILS		5 Total Units		4 bed houses	1		1
Affordable Proportion	0%	0 Affordable Units		5 bed house	0		0
Affordable Mix	33%	Intermediate	0%	Social Rent	67%	Affordable Rent	
Development Floorspace		460 Sqm Market Housing		0 Sqm Affordable Housing			
Development Value							
Market Houses							
0 Apartments	50	sqm	4000	£ per sqm	0	£	-
2 2 bed houses	75	sqm	3900	£ per sqm	150	£	585,000
2 3 Bed houses	90	sqm	3800	£ per sqm	180	£	684,000
1 4 bed houses	130	sqm	3700	£ per sqm	130	£	481,000
0 5 bed house	155	sqm	3700	£ per sqm	0	£	-
Total SQM				460			
Intermediate							
	65%	Open Market Value					
0 Apartments	50	sqm	2600	£ per sqm		£	-
0 2 bed houses	75	sqm	2535	£ per sqm		£	-
0 3 Bed houses	90	sqm	2470	£ per sqm		£	-
Social Rent							
	40%	Open Market Value					
0 Apartments	50	sqm	1600	£ per sqm		£	-
0 2 bed houses	75	sqm	1560	£ per sqm		£	-
0 3 Bed houses	90	sqm	1520	£ per sqm		£	-
Affordable Rent							
	50%	Open Market Value					
0 Apartments	50	sqm	2000	£ per sqm		£	-
0 2 bed houses	75	sqm	1950	£ per sqm		£	-
0 3 Bed houses	90	sqm	1900	£ per sqm		£	-
5 Total Units							
Development Value						£ 1,750,000	£ 1,750,000
Development Costs							
Land	Apartments	0 Plots	25241	£ per plot		£	-
	2 bed houses	2 Plots	63103	£ per plot		£	126,205
	3 Bed houses	2 Plots	72117	£ per plot		£	144,235
	4 bed houses	1 Plots	100964	£ per plot		£	100,964
	5 bed house	0 Plots	126205	£ per plot	Total Land	£ 371,404	£ -
SDLT						£ 8,070	£ 8,070
Construction							
Apartments	1946.95	£ per sqm	-	Market Housing Construction Cost	£	530,840	1946.95 £ 722,200
2 bed houses	1154	£ per sqm	173,100				1570
3 Bed houses	1154	£ per sqm	207,720	Affordable Housing Construction Cos	£	-	1570
4 bed houses	1154	£ per sqm	150,020				1570
5 bed house	1154	£ per sqm	-				1570
Additional Affordable Housing Land Cost							
Professional Fees		8%	Build Cost	£	42,467	£	57,776
Legal Fees		0.5%	GDV	£	8,750	£	8,750
Statutory Fees		1.1%	Build Cost	£	5,839	£	7,944
Sales/Marketing Costs		2.0%	Market Units Value	£	35,000	£	35,000
Contingencies		5.0%	Build Cost	£	26,542	£	36,110
Planning Obligations		1500	£ per Market Unit	£	7,500	£	7,500
Interest	5.0%	12	Month Build	6	Mth Sale	£	55,019
Arrangement Fee	1.0%	Cost		£	10,289	£	10,289
Development Profit	Market Hsg	20.0%	of GDV	Aff Hsg	6.0%	of Cost	£ 350,000
Total Cost						£ 1,451,720	£ 1,670,062
VIABILITY MARGIN						£ 298,280	£ 79,938
POTENTIAL CIL RATE PER SQ METRE OF MARKET HOUSING (IF APPLICABLE)						£ 648	£ 174

Further supporting evidence for the use of a construction cost rate of £1,570 psm for Small Developments can be taken from two council CIL reports: (i) 'Local Plan and CIL Update Viability Study' authored by Apsinall Verdi and dated February 2015 and later updated using the same rates (adjusted for inflation), and (ii) 'Local Plan and CIL Viability Assessment - Second Update' authored by Apsinall Verdi and dated December 2016.

In the council's 2015 study different rates for estate housing and small scale (1-5 dwellings) sites are used. For small scale (1-5 dwellings) sites a 2015 rate of £1,221 is used. Using the ratio of $\frac{334 \text{ [Oct 2019 BCIS All in TPI]}}{258 \text{ [Feb 2013 BCIS All in TPI]}}$ to adjust the rate for inflation. This study adopts a Small Scale Infill rate of £1,574 psm when adjusted for inflation. The 2016 study uses the same Small Scale Infill rate and adjusts for inflation. The closeness of the 2015 and 2016 rates to £1,570 psm adds further support to it being used for the viability appraisals.

The huge impact of using the more realistic construction cost rate of £1,570 psm has on the Small Scale Infill (Brownfield) sites can be seen in the summary table below:

Summary data from Viability Appraisals for Small Scale Infill (Brownfield)	2020 VA	2013 VA (adjusted for inflation)	Proposed CIL rate	CIL Buffer (2013 comparison)
Construction Costs (psm)	£1,154	£1,570	-	-
Low Value Area Maximum Residential CIL Rates psm	£438	-£39	£200	-£239
Medium Value Area Maximum Residential CIL Rates psm	£522	£48	£250	-£202
High Value Area Maximum Residential CIL Rates psm	£648	£174	£300	-£126

The table shows that by applying a more realistic £1,570 psm construction cost rate to the viability appraisals for Small Scale Infill for Brownfield there is an inadequate CIL buffer. Arguably the viability appraisals that use the realistic construction costs suggest that the CIL charge for 1 to 10 dwellings in Low and Medium Value Areas should be zero and in High Value Areas reduced. Certainly, the proposed CIL charge combined with realistic construction costs would render "Small Scale Infill" residential development sites (1 to 10 dwellings) unviable. Undoubtedly quality sites of this size coming forward in the district would be stifled.

Whilst using a £1,570 psm construction cost is more realistic it is still low especially for appraisals of the smallest sites of 1 to 3 dwellings. The council itself had previously acknowledge these sites as having much higher construction costs. In the council's 2015 CIL Viability Study (authored by Apsinall Verdi and dated February 2015) an additional/separate construction cost rate for the smallest sites (1 to 3 dwellings) of £1,401 psm is specified. Using the ratio of $\frac{334 \text{ [Oct 2019 BCIS All in TPI]}}{258 \text{ [Feb 2013 BCIS All in TPI]}}$ to adjust the rate for inflation the rate is equivalent to £1,806 psm for 2020. A construction cost rate of £1,806 psm is much closer to my experience of local costs and feedback from local construction professionals.

Surely viability appraisals should be provided for these smallest sites of 1 to 3 dwellings but have not been in the current CIL Viability Assessment. These viability appraisals should use a much higher and more realistic construction cost rate – which using the council's previous 2015 study rate it would be £1,806 psm. Again, these appraisals undoubtedly would show these sites to be unviable with the proposed CIL charge.

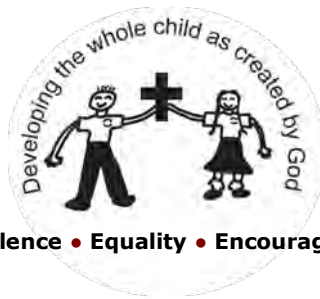
May I suggest the methodology used in the CIL Viability Assessment Report is tested against local 'real-world' sites (say 75 sites) that are representative of the type, scale, location and mix of development envisaged to come forward in the short to medium term and include suitable small infill developments. This would allow the viability

appraisals to be tested as they currently seem hugely distorted by the use of a one-size-fits-all 'median' construction cost rate of £1,154 psm based on the construction costs for estate housing built by large regional and national house builders.

I have seen that neighbouring Cherwell Council held a viability workshop during their CIL consultation. Might I suggest that the council facilitate the same to enable an in-depth discussion of assumptions and information with local stakeholders.

I would also respectfully urge West Oxfordshire to re-consider their proposal to introduce such a high rate of CIL charge for 1 to 10 dwellings as I have illustrated with the viability appraisals above, that use more realistic construction costs, that the CIL charge proposed would adversely impact the viability of "Small Scale Infill" residential development sites of 1 to 10 dwellings and would hinder the ability of the smaller local construction sector to deliver these houses within the district.

St Mary's C of E (Aided) Primary School



Headteacher
Mrs Yvonne Stallwood-Barnes
BEd(Hons) NPQH

20th August 2020

Dear Mr Chris Hargraves,

As a resident of Chipping Norton and Chair of Governors of St Mary's C of E (Aided) Primary School, Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Although a provision for a new primary school and children's facilities has been made, like with many developments including the one currently happening in West Witney these come towards the end of the development. This will mean in the early to mid-stages of the development the demand on the existing infrastructure such as primary schools, sports facilities and activities for children will exceed supply and capacity.

In the current climate whereby, local government are facing unprecedented demand for limited financial resources the levy provides opportunity for the local area to benefit from private money to improve and provide the 'extras' that local government are finding it hard to fund.

I am mindful and do my best as Chair of Governors to work to improve the school and in turn the town of Chipping Norton for future generation and not applying this levy will see new development become a burden on the town and its limited resources, without the investment to upgrade, expand and improve what we have in place already.

Yours sincerely

Steve Nelson MBA
Chair of Governors
St Mary's C of E (Aided) Primary School

The Green, Chipping Norton, Oxon OX7 5DH **tel:** 01608 642673 **fax:** 01608 641568 **email:** office.3858@st-marys-chipping.oxon.sch.uk

www.st-marys-chipping.oxon.sch.uk



From: [REDACTED]
Sent: 16 August 2020 11:04
To: Planning Policy (WODC)
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As residents of Chipping Norton we are very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

As an example of the traffic problems in the town, the congestion outside Holy Trinity School on the London Road, is one that we can see as never being resolved, cars are parked on the road to drop off and pick up the children, and there is a continuous stream of traffic in both directions, including double decker buses and articulated lorries.

We all know that the planners Utopia is that all should walk and also embrace "the new routes that prioritise walking and cycling, but in the morning a mothers priority is to get her children to school, no matter what.

Is a narrow bendy Wards Road going to be used as an "Indicative multi-modal connection', whatever this means?

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely,

Peter & Jane Nolan

[REDACTED]

[REDACTED]

From: Hilary Norris [REDACTED]
Sent: 21 August 2020 11:38
To: Planning Policy (WODC)
Subject: CIL consultation response - East Chipping Norton development

Dear Mr Hargreaves

I write as a resident of Over Norton, and hence a regular user of the facilities of Chipping Norton. I am concerned that your consultation paper proposes the exemption of the ECN development from the Community Infrastructure Levy.

The ECN development will undoubtedly have a range of positive and negative effects on the existing town in ways that we can't necessarily foresee. It is right that the Town Council, acting on behalf of local residents, should have the wherewithal to mitigate negative effects.

I cannot understand why WODC should propose limiting the Town Council's scope to take such action. It appears, instead, to prefer to further the interests of the shareholders of construction companies. This seems to me to be the wrong priority for local representatives.

Yours sincerely

Peter Norris
[REDACTED]

Sent from [Mail](#) for Windows 10

Objection to the proposal to abolish the Community Infrastructure Levy (CIL) on Strategic Development Areas (SDA's) and specifically the North Witney SDA.

The North Witney Action Group (NWAG) **objects** to the abolishment of the CIL for the following reasons:

1. WODC'S SUBMISSION TO THE PLANNING INSPECTORATE THAT THE NORTH WITNEY SDA WAS VIABLE HAS PROVED WRONG

The **CIL charge of £100 per square metre** for the North Witney SDA was a premise on which WODC assured the Local Plan Examination Planning Inspector that the **North Witney SDA was viable**. This charge was justified by WODC's own independent consultants and declared correct by the Local Plan Inspector.

In 2019 WODC commissioned different consultants to say the CIL charge on the landowners to be unaffordable even though those landowners under the CIL proposal will receive £67m from the North Witney SDA land.

To further undermine WODC's submission to the Inspector regarding the viability of the SDA this second, 2019, commissioned Report claims even after CIL is set at zero the SDA is still marginally non-viable.

2. COMPARABLE HOUSE PRICES HAVE NOT FALLEN THEY HAVE INCREASED

The premise to remove CIL is **based on a flawed model** that house prices relevant to the SDA have fallen. This is untrue, inaccurate and possibly a mendacious interpretation of the facts to fit a political not an objective planning scenario. At best it is a mistake as the consultant's assessment appears to be based on the 2015 Local Plan Viability Report not on the later version of October 2016.

The facts according to **Land Registry records** for actual sale prices between 2016 and 2019 show **house prices increased in Witney** over this period **by an overall change of 2.5 per cent**. This fact also destroys WODC's scenario that to justify the non-affordability of CIL the council's officers removed £58m of 'house value' from the 2016 Local Plan calculations when they should have added 2.5 per cent the £448m model as per the Land Registry actual sales records.

3. A BARREN & BLEAK PLACE TO LIVE: CONCRETE NOT COMMUNITY

CIL would deliver £10m of infrastructure facilities for the new community. The alarming danger is that without this landowner – not developer --- contribution a huge swath of 1400 houses already planned to be built across a sensitive environment could be devoid of health and social care facilities, community places, parks and green spaces, play areas, cultural and sports facilities.

4. REMOVAL OF CIL DENIES THE DEMOGRAPHIC PROCESS OF NEIGHBOURHOOD PLANS

The North Witney SDA is **not in Witney** but entirely within the parish of Hailey and all the land is designated as part of the Wychwood Project. This is consistently forgotten in WODC's narrative as the emphasis is on Witney and not how the proposed development breaches the important undulating gap between the town and the parish communities.

Hailey Parish Council has delivered an exemplary model Neighbourhood Plan, overwhelmingly supported by parishioners through the local demographic process. It is a plan which WODC should be championing. Up to 25 per cent of CIL income would have been stewarded by the parish council but the removal of CIL sends a message that WODC want 'Control and Command'.

North Witney Action Group
New Yatt Road
Witney
OX29 6TA

www.northwitney.org.uk

Submitted August 18 2020

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO
WEST OXFORDSHIRE DISTRICT COUNCIL CONSULTATION ON
DRAFT COMMUNITY INFRASTRUCTURE LEVY
CHARGING SCHEDULE**

Comments close 21st August 2020

Oxfordshire County Council welcomes the opportunity to comment on the West Oxfordshire District Council's Community Infrastructure Levy (CIL) Draft Charging Schedule

The County Council supports the decision to zero-rate the five SDAs (Garden Village, West Eynsham, East Witney, North Witney and East Chipping Norton) for CIL purposes. Although strategic sites will be zero-rated, this should not preclude OCC from seeking money from WODC's CIL pot to fund infrastructure relating to strategic sites if there is a funding shortfall.

The County Council will seek S106 funding to mitigate the effects of development in respect of all its statutory functions. This includes for transport, for all education infrastructure directly related to a new development and for County-level waste and recycling collection and disposal.

We note the district council's suggested payment of CIL by instalments and support the principle of enabling CIL to be phased over an appropriate timescale, in recognition of the timely delivery and viability of developments.

It is noted that the IDP is dated 2016 and will require updating, and the CIL charging schedule may also need further review in light of the current Planning for the Future White Paper consultation.

Detailed comments can be seen in Appendix 1.



John Disley
Infrastructure Strategy & Policy Manager
Communities
Oxfordshire County Council

Appendix 1

Detailed Officer Comments

Section	Page	Officer/Team	Comment/suggested change in text
IDP	96	Pupil Place Planning	Expansion of Woodstock Primary School should be shown as S106 and <u>not</u> CIL
IDP	98	Pupil Place Planning	Expansion of Wood Green and/or Henry Box should be shown as S106 and <u>not</u> CIL
IDP	99	Pupil Place Planning	Expansion of Carterton Community College should be shown as S106 and <u>not</u> CIL
IDP	99	Pupil Place Planning	Expansion of secondary capacity serving Eynsham should be shown as S106 and <u>not</u> CIL
IDP	100	Pupil Place Planning	Expansion of Marlborough School should be shown as S106 and <u>not</u> CIL
IDP	94-100	Pupil Place Planning	There are inconsistencies with some projects stating, "County Council funding" and/or "Other funding sources to be identified". These should be removed, as they will only come into play if enough s106 is not secured. CIL should probably only be referenced for the non-specific expansions, i.e. SEND or not yet specified primary schools, but we would also seek s106 for these when relevant.
Waste and recycling	2, 10	Waste	The Infrastructure funding gap analysis document refers to 'waste and recycling' (pg. 10) and mention 'waste collection and disposal' (pg. 2). The County would seek to collect funding for collection and disposal infrastructure.
Zero-rate the SDAs		Estates/Bluestone Planning	This response is provided purely from an Estates perspective, i.e. in the role of owner of the County Council's land holdings and not in the role of Statutory Authority. OCC's land holdings in West Oxfordshire District include parts of three of the Strategic Development Areas (SDAs) in the West Oxfordshire Local Plan: West Eynsham SDA; East Chipping Norton SDA; and the Oxfordshire Cotswolds Garden Village at Eynsham.

			<p>Given the significant infrastructure requirements associated with each of the SDA sites, the decision to zero-rate the SDAs for CIL purposes is to be welcomed. This decision is supported by the District Council's own evidence on viability and is consistent with the treatment of strategic sites in many other local planning authority areas.</p> <p>The decision to zero-rate the SDAs will enable the sites to be brought forward in a way that targets the spending of funds on upgrading existing / providing new infrastructure where it is needed, locally, rather than risking the funds being dispersed more widely across the District where they may not be so effective in mitigating the impacts of the proposed developments.</p>
Zero-rate the SDAs		Infrastructure Funding Team	<p>We welcome strategic sites being zero-rated for CIL to maximise S106 planning obligations for infrastructure/services to mitigate the impact of the developments.</p> <p>Although strategic sites will be zero-rated this should not preclude OCC from seeking money from WODC's CIL pot to fund infrastructure relating to strategic sites if there is a funding shortfall.</p>
IDP		Infrastructure Funding Team	It is noted that the IDP is dated 2016 and likely to be out of date.
5.1 of the draft charging schedule		Strategic Planning Team	We note the district council's suggested payment of CIL by instalments and support the principle of enabling CIL to be phased over an appropriate timescale, in recognition of the timely delivery and viability of developments.
General point		Strategic Planning Team	The CIL may require further review and amendment in light of the Planning for the Future White Paper consultation.

[REDACTED]

17 August 2020

Planning Policy Team
CIL Consultation
WODC
Elmfield
New Yatt Road
Witney OX28 1PB

Dear Planning Team

Re. Consultation on abolition of CIL, North and East Witney

We protest most strongly against the proposition by WODC to cancel the original CIL of £100 per square metre which was declared correct by a Government Inspector in 2016.

Our reasons are as follows:

1. Any large housing estate should be provided with community infrastructure - health and social care facilities, green spaces and play areas, cultural and sports facilities, community centres.
2. Without such facilities a housing estate becomes a blot on the landscape. We expect our local councillors to protect our environment.
3. If this traditional CIL funding disappears then the involvement of local communities in decision making also disappears. It is therefore an attack on local democracy.
4. Did WODC appoint a different consultant in 2019 in order to eradicate CIL? Its claim that its lower valuation is based on lower house prices in the area is erroneous: house prices rose between 2016 and 2019.
5. WODC has recently identified a huge infrastructure funding gap so its decision to deny itself much needed finance raises significant and serious questions as to the motives of the decision makers and where their priorities lie.

Yours faithfully

[REDACTED]

John Perigo

[REDACTED]

Brenda Perigo

[REDACTED]

From: NIGEL PITCHFORTH [REDACTED]
Sent: 25 July 2020 18:42
To: Planning Policy (WODC)
Subject: COMMUNITY INFRASTRUCTURE LEVY

Dear Sirs

Following the publication of the paragraph in this week's Gazette, I support the introduction of a CIL in West Oxfordshire, to provide some facilities which the hard-pressed local authority doesn't have the money for. Also it will reduce the obscene profits which some developers make - by a small amount.

Kind regards
Nigel Pitchforth
Sent from my I pad

[REDACTED]

From: [REDACTED]
Sent: 20 August 2020 19:26
To: Planning Policy (WODC)
Subject: Proposal to reduce CIL to zero for North / East Witney housing developments

Dear Sir / Madam,

We wish to object to WODC's proposal to reduce the CIL to zero for the Witney North and East housing developments.

We do not see how this could even be considered as the conclusion from the 2019 consultant is based on completely flawed data, assuming that house prices would fall. However, actual data shows that house prices have risen, so the 2019 study is completely worthless.

The CIL should be left where it is and it is up to the developers to decide if they wish to go ahead, if they decide it is not viable, then they won't proceed, it should certainly not be subsidised by WODC when the area is crying out for infrastructure improvements.

We expect WODC to behave in the best interests of the existing residents and reject this proposal.

Regards

Richard & Pauline Plumbe
Hailey

[REDACTED]

From: Jof [REDACTED]
Sent: 11 August 2020 20:43
To: Planning Policy (WODC)
Cc: jeff.haine@westoxon.uk
Subject: CIL consultation response / East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. This appears to be at least in part due to the additional costs of making the development climate neutral. I feel that neither element is negotiable - the climate crisis is an existential threat, and to make this extensive development work as part of the town it is mandatory that suitable infrastructure is funded.

Chipping Norton already has illegal levels of pollution along Horsefair so it would be untenable that this development should worsen this situation. Creation of open space and the integration of the new development into the town through making walking and cycling routes rather than motorised transport being the default method of travel within the town and it's immediate area is a vital element to this.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come—indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely
Jonathan Powell

[REDACTED]

j o f

[REDACTED]

From: Jacqueline Provins [REDACTED]
Sent: 21 August 2020 19:29
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

I am particularly concerned about increased pollution levels - already an issue in the town centre due to increased road traffic, as well as the strain on the infrastructure of Chipping Norton, e.g. health services and social care.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely,
Jacqueline Provins

[REDACTED]
[REDACTED]
[REDACTED]

Oliver Murray

From: Sarah Pulvertaft [REDACTED]
Sent: 15 August 2020 14:11
To: Planning Policy (WODC)
Cc: Craig Richardson
Subject: CIL East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of the Chipping Norton area I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town. My children have both been pupils at Chipping Norton school and I as a parent was acutely aware of the lack of resources for young people in the town, traffic levels and pollution in the town centre are also a concern – the added burden of this number of new residents warrants a significant investment in the town's infrastructure.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Sarah Pulvertaft

[REDACTED]

[REDACTED]

From: Linda Rand [REDACTED]
Sent: 21 August 2020 12:40
To: Planning Policy (WODC)
Cc: Linda Rand
Subject: CIL consultation response / East Chipping Norton SDA

Dear Mr Hargraves

I wish to object to the proposal to charge CIL at a zero rate on development at East Chipping Norton. My reasons for objection are:

1. The **inconsistencies in data** and assumptions between the the December 2016 Viability Assessment and the January 2020 Viability Assessment undermine the conclusions of the 2020 report. For example the cost of a 2FE primary school is assumed to have risen by almost 25% in just those 3 years, to which I would ask, why when construction costs have risen only 2.4? On the other hand the value of market homes is assumed to have fallen by over 26%. Local evidence indicates this not to be the case and it was interesting to see this substantiated by Land Registry figures showing an overall increase of over 6% in Chipping Norton in those three years. The inconsistencies and inaccuracies in the assumptions and data of the 2020 Assessment are huge and render the conclusions invalid.
2. The 2020 Assessment is further invalidated by the economic effects of the **Coronavirus** crisis. All assumptions on housing demand need to be revisited to reflect changes in public perceptions and the well documented increased desire to move from cities to rural areas, which could push up house prices in rural areas, particularly those within an easy commute of London, such as Chipping Norton. A new assessment should take account of emerging new trends.
3. In the calculation of development costs, **developer's profit** of between 15-20% (here I calculate 16%) is the norm. However, in a post-Covid world, it seems to be unrealistic that such historic assumptions should remain unaffected when so much else has changed. Volume house-builders should not be exempt from having to reassess, even temporarily, their profit margins, in the same way that many other businesses have needed to do.
4. Another key ingredient of development cost is the **cost of the land**. Here we are in the unusual position of the major land owner being a public authority, with stated social, economic and community responsibilities. For this authority to believe it can treat its land as a cash cow, maximising its own financial gain at the expense of the provision of much needed community infrastructure verges on the immoral. Again, in a post Covid world, we need to see public authorities working with and for the benefit of its communities, not asset stripping them. The County Council should be prepared to accept a land value that the development can realistically afford whilst creating a properly serviced community.
5. Whilst **S106** funding should and will still be sought, it has its limitations, which CIL was designed to overcome. S106 contributions can only be sought towards infrastructure directly related to the development. There is much town-wide infrastructure, already urgently needed, which is unlikely to meet the three S106 tests. S106 Agreements are negotiated behind closed doors and the result often depends on the skill of individual negotiators; there is no engagement of the affected community in the process. This is one of the advantages of CIL. Having initially been against the size of the proposed East Chipping Norton expansion,

people in town were persuaded to accept it following promises that it would, through CIL, pay for much needed projects, which could not otherwise be publicly funded. Furthermore, the Town Council embarked on the preparation of its Neighbourhood Plan in the expectation that having a made plan would entitle it to 25% of CIL funding to spent locally. The community of Chipping Norton therefore feels doubly disenfranchised. Please do not underestimate, in this respect, the extent to which residents in the town feel they have been cheated.

6. We need to ensure that the CIL charging schedule is one that will provide the community infrastructure we need, whilst still ensuing the site is attractive to home builders. The conclusions of the 2020 Assessment appear to favour the needs of the landowner and home builders over those of the existing and future community and this is just not fair. This community will be looking to West Oxfordshire to ensure a fair planning process amidst these competing demands. I therefore ask that the 2020 Viability Assessment be binned and the 2016 Viability Assessment be updated, including also taking account of the potential new financial norms of a Covid 19 world. A range of financial models should be run allowing for a range of developer's profits and a range of land values. If the County Council is a responsible public authority it should sign up to this publicly open exploration of what is genuine "best value" for the community it serves.

kInd regards

Linda Rand


[REDACTED]

From: Kev Rees [REDACTED]
Sent: 16 August 2020 09:57
To: Planning Policy (WODC)
Subject: Objection to Zero-rated CIL

To whom it may concern,

I am writing to voice my objection to the proposed zero-rated CIL as the funding will be required to provide the extra facilities required to support such large developments, rather than leaving the existing facilities already in place to become overwhelmed.

You just need to look up the Broadlands Development in Bridgend as one of many examples. A large housing development built on a green belt on the condition that enough doctor surgeries, schools, pubs, youth centres and shops were also built at the expense of the housing developers to prevent the existing facilities/infrastructure being overwhelmed.

Kind regards,
Kevin Rees

[REDACTED]
[REDACTED]
[REDACTED]

From: Anne-Marie [REDACTED]
Sent: 20 August 2020 09:03
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Mr Chris Hargraves,

As a resident of Churchill outside Chipping Norton, I was very concerned to hear that the East Chipping Norton development could be exempt from the Community Infrastructure Levy if this is set at a zero rate as proposed in the consultation paper.

As you will appreciate the East Chipping Norton development will significantly increase the size of Chipping Norton and will put considerable pressure on the already stretched infrastructure. It is vital that improvements in infrastructure and community facilities are made to accommodate this growth. I am particularly concerned about the huge impact the development will have on increasing road traffic and pollution and the damage this will do to our environment not just to Chipping Norton but the Area of Natural Outstanding Beauty that the town adjoins. This will have a knock-on effect to our road systems, health services and facilities, and the tourist industry on which much of Chipping Norton and the surrounding area relies.

It is only right that those profiting from this residential development should be asked to invest properly in the infrastructure and services which will affect the quality of life in our locality for decades to come – the town was assured this would happen when this significant development was regrettably given consent and I would urge WODC to ensure the developers pay a CIL as a small contribution to the huge costs the Council will have to bear as a result of this excessive development.

Regards

[REDACTED]

Sent from my iPhone

[REDACTED]

From: Jenny Roberts [REDACTED]
Sent: 14 August 2020 12:00
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

I am particularly concerned about the pollution levels and increased road traffic. If Chipping Norton wants to attract people to the town centre, to shop and socialise, the roads need to be more family-friendly. Pushing a buggy, wheelchair, cycling or even just walking around the town centre is not easy because of the proximity of extremely large lorries and very narrow pavements in many places. It does not feel safe or pleasant. Without central safe spaces in the town, fewer and fewer people will want to spend time in the town, and shops, cafes and restaurants will all suffer. It is surely important that Chippy remains family-friendly, with a diverse, active population.

The CIL would give the town council more influence over making decisions on behalf of Chipping Norton residents. The profit of developers will still be considerable, but it should not be at the expense of local residents. A long-term investment in the needs of residents will pay off in terms of physical and mental well-being. Keeping community needs at the forefront of development is not just morally just, but also financially sensible in the long-term.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Jenny Roberts

[REDACTED]

[REDACTED]

From: Issy Robinson [REDACTED]
Sent: 20 August 2020 12:18
To: Planning Policy (WODC)
Subject: CIL Consultation on Draft Charging Schedule Impact on Chipping Norton

Dear Mr Chris Hargraves

As a resident of a small village near Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

I am also very concerned about increased pollution levels and road traffic, need for improved access to health services, to community services, access to open spaces and recreation facilities.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Issy Robinson

[REDACTED]

Sent from [Mail](#) for Windows 10

[REDACTED]

From: Jo Roe [REDACTED]
Sent: 04 August 2020 09:39
To: Planning Policy (WODC)
Subject: Community Infrastructure Levy

> Dear Mr Haine

>

> You requested views on the implementation of a community infrastructure levy on new buildings with an internal area of more than 100m².

>

> I believe that such a levy should be applied to new housing estates and the charge should be applied to the developer.

>

> West Oxforshire has seen and is suffering a huge influx of new housing estates which are having a huge impact on local villages and the countryside. The increase in traffic and pollution (fumes, litter, noise)during and post-construction and reduction in green spaces is having a massive detrimental impact On our environment and health.

> Houses are being built where there are few if any jobs thus requiring people to commute to work, increasing traffic on already over-congested routes to towns and cities.

> The increase in population is adding to already over-stretched infrastructure and local services such as health centres/doctors' surgeries and schools.

> Construction jobs are short-term and rarely to the benefit of the local community. Once built on the land cannot be used for farming and food production and wildlife and it's habitat is destroyed. This country has limited resources and we need to protect them for the long-term future. We are already unable to produce enough food for the population without imports and many native plants and animals are being endangered by further building on land.

> Developers make significant profits from their new housing estates but do not have to ensure any of the negative impacts. They need to compensate. This has to be addressed urgently and comprehensively with sensible, sensitive and proactive planning including reducing car, van and lorry traffic.

>

> I wholeheartedly endorse the introduction of a significant levy for housing developers.

>

> Yours sincerely

>

> Jo Roe

> Bampton

>

NIGEL D ROSE MA CEng MIMechE

Tel: [REDACTED]
e-mail: [REDACTED]

2nd August 2020

Mr Chris Hargraves
Planning Policy
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney OX28 1PB

by e-mail

Dear Mr Hargraves,

CONSULTATION ON COMMUNITY INFRASTRUCTURE LEVY (CIL) CHARGING SCHEDULE

I am writing to strongly object to the proposed charging schedule of zero relating to the East Chipping Norton SDA.

6 years ago, most in Chipping Norton objected to the "Tank Farm" development at East Chipping Norton – with few local jobs it would just be for commuters and, with only an hourly bus service to Oxford and no railway station, it was an unsustainable location. Residents were told more houses were vital for Oxfordshire's future and it would be OK because, with the then new Community Infrastructure Levy (CIL), the town would be able to pay for all those local projects so desperately needed. Furthermore, if we produced a Neighbourhood Plan, the Town Council would have direct control of 25% of the CIL money. The Town Council accordingly invested in the preparation and adoption of a Neighbourhood Plan. Since then the planned number of houses has been increased by 140%.

The SDA gives the opportunity to develop an exemplar location for the whole of Chipping Norton – the existing town and the new development integrated together – but only if proper infrastructure is provided. The Infrastructure Development Plan 2016 is deficient in a number of respects if the Town is not to be overwhelmed by a ½ increase in population. For example, there is insufficient funding indicated for proper off-street parking, a new library, expanded medical facilities, increased frequencies of bus services to all destinations, cycleways, resolution of the HGV problem which creates air pollution above safe limits.

In 2017 it was proposed that the CIL charge in SDAs would be £100/m² and for other developments outside the AONB would be £200/m². In 2020 for Chipping Norton the proposals are 1-10 £250/m², 11+ £125/m² and for the SDA £0. The latter is based on a viability assessment produced by consultants. All the change in viability seems to be based solely on a drop in house prices over the 3 years. However, Land Registry figures do not bear this out, 2019 prices being 6.3% higher than 2016 and currently prices are still rising. The conclusions from the viability assessment are therefore flawed.

There is an additional problem for Chipping Norton. There are only a very small number of sites left where the non-SDA CIL could be charged following the very recent significant developments at Cotswold Gate (Burford Road) and the Pillars (Banbury Road). Effectively as far as housing is concerned all the eggs are in one basket – East Chipping Norton SDA.

WODC are suggesting that all the infrastructure will still be provided by means of s.106 agreements but there is no guarantee of this. Funds provided under s.106 have generally to be limited and relate only to the actual development; CIL is designed to be spent for the benefit of the wider community, precisely what Chipping Norton needs if we are not to end up with an isolated development on the edge of and no

integration with the existing town. The process of making s.106 agreements also lacks in transparency and there is little or no opportunity for inputs and decisions by local people.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant, but then smaller, development was originally proposed. To reduce the CIL to zero means those promises accepted in good faith by local people have been broken.

I urge you to restore the CIL charge for East Chipping Norton SDA to the level proposed in 2017 of £100/m² as a minimum.

Yours sincerely,

Nigel Rose

Cc: Cllr Jeff Haine, Cabinet Member for Strategic Planning

From: [REDACTED]
Sent: 20 August 2020 16:46
To: Planning Policy (WODC); Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Hargraves,

As a younger resident of Chipping Norton I am appalled to hear that the East Chipping Norton development could be exempted from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will significantly increase the size and population of our town and subsequently will put additional pressure on our already stretched infrastructure. It is ridiculous to believe that improvements in both infrastructure and community facilities aren't necessary in this manner and it has a huge impact on the growth of the town; in particular the rise in both young families and retired people will require additional healthcare and leisure facilities. Chipping Norton and the Cotswolds is renowned for its beauty and idyllic British heritage, building new houses without the increased infrastructure is only going to ruin the area for residents and visitors; leading to increased traffic, pollution and busier facilities which are already stretched as is.

Companies who are profiting substantially from house building must be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come, as was planned when this major development was originally proposed. It is unfair to assume that the residents of Chipping Norton will cough up the money to pay for infrastructure required to support the new houses developers are profiting off.

Yours sincerely

Mr Alfred Rowett

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 20 August 2020 15:01
To: Planning Policy (WODC); Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempted from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will significantly increase the size and population of our town and subsequently will put additional pressure on our already stretched infrastructure.

It is vital that improvements in both infrastructure and community facilities are made in order to accommodate the growth in the town; in particular the rise in both young families and retired people will require additional healthcare and leisure facilities. People choose to move to this beautiful part of the country to enjoy fresh air and green open spaces, not urban development and traffic pollution, which could easily be the case if this development is not handled in a sensitive manner.

Companies who are profiting substantially from house building must be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come, as was planned when this major development was originally proposed.

Yours sincerely

Dr Lewis Rowett

[REDACTED]