

**West Oxfordshire District Council Community Infrastructure Levy
Draft Charging Schedule - February 2015 - Consultation**



This is the response of Eynsham Parish Council

Eynsham Parish Council (EPC) considers the Draft Charging Schedule unsound and objects for the following reasons:

1. Residential Development

(a) EPC objects to the proposed rate of £100 psm for development of 11 units or more. The reason given in the Schedule (4.6) that 'This lower rate takes account of the fact that such schemes will trigger an on-site affordable housing requirement which will have a significant impact on the gross development value of the scheme', cannot be substantiated. Affordable housing is applicable for CIL relief and developers do not lose money on it.

It is admitted that most developments in West Oxfordshire are under 10 units. These are built by smaller, local builders who are more likely to make the best use of available land and create dwellings more in character with the surrounding area. This lower rate amounts to a subsidy or tax break to large developers of larger developments. It would also promote larger, anonymous developments rather than smaller scale local developments. This would be contrary to Draft Local Plan Policy H2 (Delivery of New Homes) where residential development will be expected to be of proportionate and appropriate scale to the context having regard to the potential cumulative impact of development in the locality.

All residential development should have had the same CIL rate.

(b) Supported Living

It is admitted in the DLP that West Oxfordshire has more 55+ people than the rest of Oxfordshire (as it does in the SHMA, which says it also has a lower level of elder care housing) and this is set, according to the DLP, to rise by 54% by 2031. The need for elder care housing is equally District wide. To use the Value Zones to propose a £100 psm rate on Sheltered and Extra Care Housing in the High and Medium Value Zones amounts to an inequitable, arbitrary tax on elder health care provision. This is contrary to DLP Policy H4 (Type and Mix of New Homes) which says particular support will be given to proposals for specialist housing for older people including but not restricted to, extra care housing. Opportunities for extra care will be sought in service centres [such as Eynsham, in a High Value Zone] with good access to services and facilities for older people.

All sheltered and Elder Care housing should be £0 rated.

(c) High-Medium-Low Value Zones

EPC objected to these Value Zones in the initial consultation for a number of reasons, including being too arbitrary to form an equitable tax base, which would create a postcode lottery for future development. They were not fairly based, either within the zones or in comparison with each other. In the last consultation 57% of the consultees disagreed with them. These Zones now only exist in the present draft Schedule to justify the arbitrary and inequitable rate for Sheltered and Elder Care housing. This should be fairly rated at £0 and the Value Zones deleted as having no use.

2. Non Residential Development

(a) EPC objects to a £0 rate for office and industrial development. While these developments may bear a s106 cost for site-specific infrastructure this takes no account of the 123 List infrastructure costs. Large office, and particularly industrial premises, can have a considerable impact on the infrastructure need in their area. With a £0 rate, this will fall disproportionately on the residential sector. The AV viability study's conclusion that CIL is 'unviable' seems to be heavily influenced by the AV consultations with estate agents and developers. If there is no proposed development, a reasonable rate would make no difference. If development is proposed, a reasonable rate in place would allow this to pay its fair share of the infrastructure cost.

(b) Drawing a distinction between A1-A5 development in designated 'Town Centres' at £30 pms and £50 pms in the rest of the District is inequitable. Why should a new shop in Woodstock 'Town Centre' pay less than a new shop in a Rural Service Centre such as Eynsham (which is larger)? This is contrary to DLP Policy E2 (Supporting the Rural Economy). The charging rates in the rest of the District should be no greater than the designated 'Town Centre' rates.

(c) EPC objects to a blanket exemption for 'Other Uses' as set out at 4.11 of the Schedule. Planning Use Classes are not appropriate in all cases for CIL purposes. A distinction should be drawn between those which form social infrastructure (such as health centres, nurseries, schools, libraries, etc.) which should be £0 rated and commercial operations which, like A1-A5, should pay their fair share towards the demand for infrastructure they create. EPC has no objection to a £0 rate for agricultural development, which would make little or no demand on public infrastructure and is generally an integral part of an existing farm. However, any commercial or retail use, such as a farm shop or agricultural buildings used or sold for office or industrial use should be rated accordingly.