



**Vale  
of White Horse**

*District Council*

# **Community Infrastructure Levy Spending Strategy**

**CONSULTATION SUMMARY**

**MARCH 2019**

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## SUMMARY

1. This report has been produced to analyse the comments received on the draft Community Infrastructure Levy (CIL) Spending Strategy consultation.

The draft CIL Spending Strategy sets out how the Vale of White Horse District Council should allocate CIL revenue to help contribute to the broad range of infrastructure needs that new developments generate.

The consultation ran for four weeks between 14 January and 11 February 2019. We received 18 responses in total, with a variety of different representatives commenting on the proposed strategy. A full breakdown of the comments and our response to them can be reviewed at Appendix A.

The consultation highlighted support for the development of the CIL spending strategy, as well as some common concerns and considerations, as follows:

- support for the planned spending strategy as presented
- support for the structured percentage allocation of funds
- a request for greater transparency and consultation with the local community in which the CIL funds are generated to ensure credible expenditure
- the concern that the strategy will only benefit those local communities that have new housing developments
- that more support is needed for smaller communities that may be directly affected by developments nearby
- that mechanisms put in place to ensure that geographic relevance is given to where CIL funds are spent
- concerns that CIL expenditure could be used to support private enterprises such as GP surgeries and schools
- the need for transparency in the CIL administration, reporting and monitoring process
- the need for collaborative working and joint agreements between stakeholders involved.

## **BACKGROUND**

To support continued growth in the Vale of White Horse, there is a need to ensure the appropriate level of infrastructure is in place to support new housing developments. To help fund this, developers are obliged to pay CIL on new developments to contribute towards such infrastructure needs.

Where a new development has been built, statutory regulations state that the towns and parishes where the development has occurred receive 25 per cent of the CIL revenues if they have an adopted neighbourhood plan, or 15 per cent if they have not.

Up to five per cent of the CIL revenue raised can be used to cover administration costs related to tracking, monitoring and reporting on CIL revenue and expenditures.

The CIL spending strategy therefore addresses how the council will utilise the remaining balance of CIL funds generated.

A consultation strategy was developed that provided stakeholders with the opportunity to review and comment on the draft strategy, which once adopted will then be reviewed after one year to test its effectiveness.

## **METHODOLOGY**

The consultation methodology consisted of the following:

- an email notification to key stakeholders, including district councillors, parish and town councils, developers and land agents providing a link to the documents and details of how to comment. A copy can be found at Appendix B
- preparing a summary of the CIL Spending Strategy, for ease of understanding
- updating the website and publishing the full draft report and summary document and a link to the online survey
- a focused online survey, offering the opportunity for participants to review and comment on the draft strategy in a free text box
- a four-week consultation period for submitting comments.

## KEY FINDINGS

2. The consultation generated feedback that supports the council's approach to develop a strategy on CIL spending. Comments received by respondents were diverse and generated independently.

Some respondents voiced their concerns that smaller parishes who are not hosting new developments will not receive any benefits from CIL spending, but will feel the repercussions of other developments nearby through such issues as increased traffic and oversubscribed schools. It was requested that the strategy should be amended to allow support for adjacent communities to benefit from CIL where they are likely to be affected by any new development.

In comparison, other respondents identified that there is greater need for CIL expenditure to occur within the geographical areas that the CIL is generated from. It was commonly identified that this mechanism would offset any impact of development directly within the communities involved.

Many respondents supported the percentage-based approach to the spending strategy, with some respondents indicating that it seemed 'proportionate' and 'sensible'. However, it was indicated that it would be helpful to publicise how specific provisions will be spent. Other comments suggested that opportunity should be given for local organisations and parish/town councils to have an input on the CIL expenditure, especially in terms of identifying mechanisms to help parishes determine priorities for their share of CIL. The various comments were put forward to generate transparency, credible expenditure and to ensure community needs are met.

Other comments included general queries and questions clarifying the process for CIL and requests for higher percentage allocations. Furthermore, subjective comments were received from individuals with issues relative to their specific communities.

All comments received have been reviewed by the Infrastructure and Development Team and feedback has been provided. This can be found at Appendix A.

## HOW WE HAVE USED RESULTS OF THE CONSULTATION

Thank you to everyone that has participated in the consultation. The officers' response to all comments received can be found at Appendix A.

The draft strategy document will be considered by Cabinet on Friday 5 April 2019.

The council will complete a pilot during the next financial year, to measure the strategy's effectiveness.

## FURTHER INFORMATION

For information about the consultation or the results presented in the report, please contact the Community Engagement Team at:

[haveyoursay@southandvale.gov.uk](mailto:haveyoursay@southandvale.gov.uk) / 01235 422600

To enquire about the councils' work on CIL Spending, please contact the Infrastructure and Development Team:

**write to us at:** Vale of White Horse District Council  
135 Eastern Avenue  
Milton Park  
Abingdon  
OX14 4SB

**email us on:** [communityinfrastructure@southandvale.gov.uk](mailto:communityinfrastructure@southandvale.gov.uk)

**call us on:** 01235 422437

## APPENDIX A

3. A table displaying consultation comments received and feedback from the Infrastructure and Development Department.

<b>Comments received by:</b>	<b><i>Q1. Having read the CIL spending strategy, please provide your comments below:</i></b>	<b><i>Infrastructure &amp; Development Team Feedback</i></b>
Individual	<p>The structure of the breakdown of funds allocated seems proportionate and sensible. In my opinion where Vale and County Councils take on spending for infrastructure, there should a clear, credible and definite consultation period with the community in which the development is being built in order that the community has its say on how these funds are to be spent. This would reduce the perceived mis-spend of funds in areas that are not affected by the development in question, but receive the CIL funding benefits all the same.</p>	<p>Thank you for the positive feedback.</p> <p>VWHDC officers will work with PTCs to support their CIL implementation process, including community level consultations.</p>
Individual	<p>Faringdon has had a large about of new housing which is great and I would welcome more, however, nothing has been down for the town. we need restaurants if you scan over local Facebook pages a lot of people ask where is nice to eat, the only place that people recommend is the tapas bar, the rest recommend out of Faringdon. Surely the people of Faringdon should support the town more but where in the town can you go for a family meal NOWHERE.</p> <p>Parking is dangerous, the council would not care if someone was injured, potholes too along Coxwell road is out of control.</p> <p>The local swimming pool staff are great but the centre is in poor condition, the boilers keep breaking which means the pool is freezing, the showers where people wash their hair is next to the pool, therefore, soap is getting into the main pool. The changing room is terrible, everything is broken.</p> <p>And finally, the A420 is the worst road I have ever been on, the amount of traffic is terrible. There are accidents every week and that's not taking into account the near-miss accidents, WHY isn't this road a dual road.</p>	<p>Thank you for this diverse feedback. We will forward this to your Town Council.</p>

	oh and the infant school is bursting, my only option was to drive my child to Lechlade, out of Oxon to Gloucestershire because the school in Faringdon said no room at the inn.	
Individual	I support the planned strategy	Thank you for the positive feedback.
Individual	<p>Thanks for providing this consultation. However, I disagree with:</p> <p>Vale of White Horse: green infrastructure/biodiversity provision 5%</p> <p>Vale of White Horse: public art and cultural heritage/public realm (including improved disabled access) 5%</p> <p>Despite there are not enough funds for everything I believe these 2 categories should increase their budgets up to 15% as through the good management for open spaces can help to prevent social and health problems. Thanks. - <a href="https://files.smartsurvey.io/2/1/HNGKTPTQ/105182576_7993726_811466.pdf">https://files.smartsurvey.io/2/1/HNGKTPTQ/105182576_7993726_811466.pdf</a></p>	<p>Thank you for this feedback, the percentages will be reviewed after one year by the council cabinet members.</p> <p>The issue as you mentioned is that there are not enough funds for everything, and an extra 20% allocation here would have to be deducted from somewhere else.</p>
Individual	Most of the CIL is squandered, the whole amount should be spent on transport infrastructure and social housing.	<p>Thank you for this feedback. I am not sure on what basis you state that the CIL is being squandered as the VWHDC has not as yet started spending CIL funds.</p> <p>You can only therefore be referring to PTC expenditures which to date in Vale have only been small.</p> <p>VWHDC officers will undertake a thorough monitoring of CIL spend and ensure its proper usage.</p>
Individual	Don't disagree with split of money but would like opportunity for local (Parish Council) input to what and when.	Thank you for this feedback. Parish Councils receive 15/25% of the CIL



		<p>funding to spend on infrastructure themselves. Their representatives sit on the council cabinet that decides the CIL percentages and are able to attend all CIL cabinet meetings to express their sentiments.</p>
Individual	<p>Whilst I see the need for money to support the local provision of health Care and Education I do regard CIL money as a tax which is paid to the District Council. This money then becomes public money which is not the case with s106 money. The CIL strategy is a copy of the s106 approach and as such could well be given to GP surgeries and schools both of which may not be publicly owned. If the money is used to support improvements to assets that could be sold then public money is being used to support private enterprise which I feel is unacceptable. The support of services however would be acceptable.</p>	<p>Thank you for this feedback. VWHDC officers will be working with all the Oxford Clinical Commissioning Group to monitor how CIL funds will be spent. Inherent within OCCG activities is the need to support the expansion of GP surgeries, however, your concern that funds would be used to support private enterprises is valid and VWHDC will endeavour to avoid this wherever possible.</p>
Individual	<p>The distribution of CIL receipts seems to be fair. The VoWH 30% portion of the balance also seems fair in its distribution. However, it is essential that the VoWH portion is spent in those communities affected by developments and the consequent population increase.</p> <p>E.g. the population of Faringdon was 7,121 at the 2011 census. It is now ~8,300 and will be over 11,600 if all the proposed housing developments come to fruition. This is a 60% increase in population, yet apart from a proposed primary school and some expansion of the Community College there has been no commensurate improvement in infrastructure for sports and leisure facilities, green infrastructure/biodiversity provision, and public realm. There have been some benefits for public art and cultural heritage from S106, but this has not been available from the majority of developments. The CIL spending strategy should support the Local Plan and Neighbourhood Plans.</p>	<p>Thank you for this feedback. The council has communicated the need to spend CIL revenues in the locations it was raised to all recipients. This is impossible to do completely accurately, however, the CIL application process will look at this as an integral factor towards project approval.</p>
Charney Bassett Parish Council	<p>See Proposal in attached document, quoted below:  <a href="https://files.smartsurvey.io/2/1/5G3DKEDF/106871426_7993726_825603.pdf">https://files.smartsurvey.io/2/1/5G3DKEDF/106871426_7993726_825603.pdf</a></p>	<p>Thank you for this feedback. Feedback in general to date suggests that there is an overriding request from councillors</p>

Comment on Vale of White Horse District Council Draft Community Infrastructure Levy Strategy

Summary:

The District's CIL strategy is directed towards benefiting only those local communities that are hosting new developments. It does not have to be so. The strategy should be amended so there is opportunity for smaller communities to benefit from CIL where they are likely to be affected by new development.

The District's CIL strategy looks at how the remaining portion of the payments will be administered after deductions after town and parish payments are made and admin costs are deducted and advises that this could be used "to mitigate the impact of an individual development as well as the overall cumulative effect of development" (3).

However, it believes that "...public pressure may require funds to be spent as much as possible in the location that the CIL revenues were generated".

So the District appears to have decided that its CIL fund will be spent only on those communities directly affected by development (i.e. in those areas within which new development will take place).

Relevance of CIL to Charney Bassett:

Charney Bassett is classified in the District's adopted Local Plan (Part 1) as 'open countryside'. As a result, very little new development can be anticipated so few direct CIL payments to the Parish Council are likely. Like many others, Charney Bassett is a settlement close to areas where significant development will take place and where the effects will be felt - in particular through increased traffic.

There are some 32 identifiable settlements in the District that, like Charney Bassett, are classified as 'open countryside'. Identifying their total population is difficult, but Appendix 1 (available in the link above) indicates that they account for at least 4,000 residents and, in all likelihood, in excess of 5,000.

and town and parish councils that funds should be spent in the areas where they are generated. For example, please see the comments received by Radley, Kennington and Faringdon Parish Councils below.

To match any increased transport needs generated by new housing close to Charney Bassett, it is suggested that they contact OCC directly. Please note that the CIL funding contributes only a small proportion of the OCC budget and although it would appear unlikely that CIL funds would be used to meet your increased needs, separate funding within OCC may be able to do so.

The proposal to withdraw biodiversity and public art money is a question of preference, and the suggestion put forward would detract from other community needs beyond road traffic.

The suggested solution to ask OCC to ring fence a small percentage of the CIL funding for areas affected by CIL generating areas might be possible, however, the amount of funding involved would remain small and unlikely to meet expected needs.

Collectively these settlements account for at least 3% – 4% of the District population (4).

Charney Bassett has an adopted Community-led Plan (5). Residents' main concern was road safety. The village is a known 'rat run' for traffic seeking access to (and from) A420 and beyond from the south – principally Wantage/Grove. Several stretches of road in the village have no footpaths. The Parish Council paid for a traffic volume and speed survey in 2018 that established notable peak traffic flows with vehicles persistently travelling above the 30 mph limit. With so much growth still planned nearby, traffic volumes and speeding violations will only continue to increase. Verge and road damage, particularly to edges, is a growing problem.

In discussion with OCC a number of initiatives to help improve road safety have been identified (Appendix 2) (available in the link above) but their funding is well beyond a small Parish Council and the County Council has apparently not maintained a road safety budget since 2010. There is nothing in the consultation paper to suggest that CIL will help villages such as Charney Bassett mitigate the impacts of development nearby – in our particular case much needed improvements to road safety.

Finally, the village is used as an official alternative route where the A420 has to be closed following a vehicle accident. This may only be occasional, but large volumes of traffic can be involved and it is important that the village road system is made as safe as possible to cater for such occasions. The strategy for the A420 in the County Council's Local Transport Plan (LTP4) recognises a need for the road to operate efficiently in order to avoid rat running on minor roads. One solution put forward is a 3 Para 5 of Consultation Paper 4 District population 128,738 in 2016 according to District Data Analysis Service 5 May 2016 need for mitigation measures (6) on minor roads to help cope with rat running, but the only way put forward for funding such measures is for planning applicants to bring forward such measures as part of their planning applications. As already pointed out, Charney Bassett is not an area where new development can be anticipated so it is most unlikely that any necessary funding will come directly from planning applications.

Proposed Alterations to the District CIL Strategy:

There needs to be better recognition that the considerable development that is taking place in the Vale impacts on the whole District – not just the Town/Parish in which they are located. Smaller communities who will not receive CIL funding directly (because they are classified as “open countryside”) should have access to a proportion of the funding being administered by the District and County Councils.

In the particular case of Charney Bassett, the process of Village -Led Community Planning is in danger of being undermined if properly thought out and realistic proposals to counter the consequences of nearby housing developments cannot be properly funded. CIL provides a means to overcome this, but not without a change in the way it is proposed to be administered. Failure to offer some support for communities like ours affected by the considerable development taking place in the Vale is likely to make it very difficult to get public involvement and engagement when the Community-Led Plan is next updated. A relatively small amount of funding could have a potentially significant benefit to communities like Charney Bassett in terms of mitigating the negative impacts of large new developments nearby.

One way forward would be for a small percentage of the District CIL fund (perhaps 3% - or £90k) to be held back for bids from the type of communities we have identified. This should be taken from the 10% of funds identified for green infrastructure, green infrastructure and public art etc. and made available for initiatives that would help mitigate the impact of new development. Because a common concern will be road safety, the fund should be made available for such spending, notwithstanding this is normally a County function (Appendix 1 highlights the settlements particularly affected by through traffic) (7) .

Alternatively, the intended District/County MoU should include provision for a specified proportion of the CIL funds that are passed to OCC to be ring-fenced for bids by Parish Councils that host the communities listed in Appendix 1 – and particularly those highlighted. In this case the fund would be administered

	<p>by the County Council and not the District Council. If this approach is preferred, the County Council share of CIL might be increased to 53% to accommodate this. The MoU could alternatively commit a proportion of the County's CIL spending to a dedicated road safety budget – but that would not guarantee to adequately benefit the communities identified, so is not preferred.</p> <p>6th February 2019</p> <p>Footnotes:  1. Since November 2017  2 Para 9 of Consultation Paper  3 Para 5 of Consultation Paper  4 District population 128,738 in 2016 according to District Data Analysis Service  5 May 2016  6. LTP4 says these should include local traffic calming and traffic/speed management measures, to be agreed with the relevant local communities.  7 It is possible that this is the intention behind the 'public realm' spending fund identified in the proposals table. But this seems unlikely - given the District's stated overall approach to CIL. Whether this is the case or not, the intention behind this element of the fund needs to be made much clearer in any event.</p>	
<p>Radley Parish Council</p>	<p>Please see attached file "190128 Radley PC response to the Vale Infrastructure strategy" quoted below:  <a href="https://files.smartsurvey.io/2/1/4YYMPCPV/105902749_7993726_817140.docx">https://files.smartsurvey.io/2/1/4YYMPCPV/105902749_7993726_817140.docx</a></p> <p>Radley Parish Council has three main concerns about these proposals:  <b>i. A bigger share of CIL for OCC</b>  The draft strategy proposes that 50% of CIL receipts (after allowing for the parish share and admin costs) are allocated to OCC for education and transport infrastructure. No justification is offered for this apportionment. The evidence suggests that an OCC allocation of 70% would be more appropriate.</p> <p>The Vale's IDP for Local Plan Part 1 identifies infrastructure needs arising from development of the two strategic sites in Radley and indicates which of these</p>	<p>Thank you for this feedback. The CIL strategy supports as many community needs as possible. Should the share of CIL for OCC rise to 70% then of course other recipients would have to receive less or nothing at all. Please note that the amount of funding for OCC will be quite small in comparison to their annual budgetary needs, as such, raising this by 20% would have no significant impact.</p>

will fall to CIL rather than s 106. 72% of CIL needs relate to OCC services (see analysis in Annex)<sup>1</sup>. The same general conclusion can be drawn from VWHDC's cross-district information on the type of infrastructure benefitting from developer funding in the 5 years prior to the adoption of CIL. This split in the ratio 69:31 as between OCC and other services<sup>2</sup>.

This issue is of particular concern in Radley as the expansion of Radley Primary School to meet additional demands arising from the developments is high priority.

**ii. Mechanisms to help parishes determine priorities for their share of CIL**

The draft strategy is completely silent about arrangements for liaison between parishes, the Vale and other authorities to ensure their CIL programmes are complementary. The strategy needs to address this issue.

Radley PC is expecting CIL receipts in the order of £1.5m over the seven years from 2019/20, and is currently developing its own strategy for how this money should be spent. We need to understand other authorities' plans for CIL expenditure to ensure that our plans complement theirs. This is particularly true in relation to the expansion of the primary school and to plans for leisure and recreation facilities which may overlap with the Vale's.

**iii. Ensuring that CIL revenues are spent in the location where they are generated**

Radley PC considers that CIL should be spent on meeting infrastructure needs arising from the development to which it relates. The Vale's own Infrastructure Delivery Plan lists needs arising from each of the strategic sites, and this should be the basis for project selection. It is not in our view acceptable that

The council has recently recruited staff within the infrastructure and development dept. to oversee CIL expenditure. These individuals will facilitate the liaison between the parish and town councils, the relevant council depts. and the external partners.

These staff will be available as a point of contact for Radley PC.

The council has communicated the need to spend CIL revenues in the locations it was raised to all recipients. This is impossible to do completely accurately, however, the CIL application process will look at this as an integral factor towards project approval. Your suggestion to add this to paragraph 16 seems reasonable.

	<p>CIL income should be diverted to projects elsewhere in the district when needs identified in the IDP for the development site in question are unmet. While the strategy recognises this argument, no mechanisms are proposed to put the principle into effect. An appropriate requirement should be added to the proposed criteria for approving projects set out in paragraph 16. These criteria should apply to internal Vale projects financed from CIL as well as to OCC and OCCG projects.</p> <p>Footnotes:  <sup>1</sup> We have not done the same analysis of IDP proposals for all sites but have no reason to suppose that the results would be very different.  <sup>2</sup> This information was provided in an earlier version of the VWHDC draft strategy.</p>	
<p>Kennington Parish Council</p>	<p>Vale of White Horse DC need to find a mechanism in order that a geographic relevance is given to where the CIL money is generated and where it is spent. For example, 70% of funds which are passed on to OCC and CCG could be spent anywhere in Oxfordshire and would not necessarily benefit those in the local area. Reviews should be open and frequent, and the council's overseeing scrutiny committee should oversee this.</p>	<p>Thank you for this feedback. The council has communicated the need to spend CIL revenues in the locations it was raised to all recipients. This is impossible to do completely accurately, however, the CIL application process will look at this as an integral factor towards project approval.</p>
<p>Faringdon Town Council</p>	<p>Faringdon Town Council have agreed that VoWHDC should be requested to send details of what they propose to spend S106 contributions and their part of the CIL. FTC would like to ensure that the voice of the community is heard. FTC understands this money can be spent anywhere and therefore it wishes it to be stressed that any monies generated from residential and other developments in Faringdon should be spent in Faringdon to offset the impact of such development on the town.</p>	<p>Thank you for this feedback. As above, the council has communicated the need to spend CIL revenues in the locations it was raised to all recipients. This is impossible to do completely accurately, however, the CIL application process will look at this as an integral factor towards project approval.</p>

<p>Buckland Parish Council</p>	<p>Buckland Parish Council is concerned that the impact of residential development outside our parish has a significant impact on our village's/parish's roads and traffic volume with no CIL proceeds being applied to mitigate.</p> <p>We support wholeheartedly the analysis of the CIL proposals submitted by Charney Basset PC although we have not reproduced the analysis with reference to the particular situation in Buckland and especially the stretch of the A420 running through our parish. We submit that the District's CIL strategy does not have to be solely directed towards benefiting those communities that are hosting new developments. The strategy should be amended so there is the opportunity for smaller communities to benefit from CIL where they are likely to be affected by the consequences, e.g additional traffic, stemming from new development further afield.</p>	<p>Thank you for this feedback. As mentioned in response to the Charney Basset PC consultation comments, feedback in general to date suggests that there is an overriding request from councillors and town and parish councils that funds should be spent in the areas where they are generated. For example, please see comments received from Radley Parish Council, Kennington Parish Council and Faringdon Town Council.</p>
<p>Oxfordshire County Council</p>	<p>We welcome the opportunity to respond and work with VWHDC in utilising the CIL to help facilitate sustainable growth within the Vale of White Horse.</p> <p>While the various comments below are numbered, this is for ease of reference and does not necessarily imply priority of any statement. We are aware in responding that the CIL climate may well change (including the removal of pooling restriction and also of the Regulation 123 List) if and when the Government's potential CIL regulations changes are brought into being.</p> <p>Comments:</p> <p>1.The introduction of CIL secures funding towards infrastructure from a larger proportion of development proposals than the S106 process alone did. However, since its introduction in VWHCD CIL has had a detrimental impact on the ability to secure appropriate funding towards mitigating the impacts of development on certain key infrastructure; such as education.</p> <p>2. The impact of CIL upon funding towards expanding and improving schools' infrastructure has arisen largely because of the inclusion of Education within the CIL Reg 123 List. In Appendix 1 to the Draft CIL Spending Strategy it</p>	<p>Thank you for this feedback.</p> <p>To respond in order:</p> <p>1 &amp;2: Noted as per your comments on the regulation 123 list and education. This will be considered next time the regulation 123 list is renewed/revised.</p> <p>3: The CIL strategy proportions will be piloted for 2 years and reviewed after one year by Cabinet (as stated in the strategy). Should such percentages be deemed to be inappropriate, appropriate steps will be taken.</p> <p>As rightly stated the 50% for OCC is allocated once 30% has already been allocated to TPCs and admin cost. For OCC to receive the 65% of the total CIL</p>



states (para 1.7) that the list (Reg 123 List) will be reviewed regularly. While the Government's proposals may make subsequent reviews redundant we would ask that next review and update of the Reg 123 List takes place as soon as possible. The County Council would welcome working collaboratively with VWHDC in reviewing the effectiveness of the Reg 123 List and any potential changes to it. In advance of such collaboration we strongly urge that as part of the next review/amendment Education be removed from the List as an infrastructure type or project that is to be funded through CIL.

3. With regards to the proposed CIL percentage allocations as set out in Table 2 of the consultation document we note that no precedent has been used on which to base the proposed allocations. An assessment of S106 secured in the neighbouring South Oxfordshire District Council in the 4 years prior to April 2016 (admittedly not a direct comparison) suggests that the percentage of S106 funding justified and secured towards County Council infrastructure & services exceeded 65% of the contributions.

Regarding Table 2 in the Draft Community Infrastructure Levy – Spending Strategy document in the consultation, it is noted that the 50% identified against OCC infrastructure equates to between 35% & 40% of the overall gross CIL receipts.

4. The County Council requests that;

- i. The Table (Table 2) and the draft strategy both indicate that OCC allocations should be restricted to Education and Transport infrastructure. While these represent the likely key elements of County Council delivery infrastructure need in the short term, the County council should be able to include other justified infrastructure within its CIL spend applications
- ii. Until the 2nd anniversary of the date upon which Education is confirmed to have been removed from the Reg 123 List that the County Council should be allowed/encouraged to put forward applications for potential CIL Spending which cumulatively exceed

generated (as per S106) they would need to be allocated approximately 90% of the remaining balance, (as opposed to the current 50%). Clearly this would not be possible as it would leave virtually nothing for any other community needs.

4i. With respect to expanding OCC usage beyond Transport and Education, this was set as such so as not to spread the CIL funds too thin across various departments of OCC, especially as there seems to be a lack of funding for transport and education (as mentioned by other consultees and yourself). We suggest this be reviewed after one year.

4ii. The 50% has to remain a ceiling, unless other recipients find themselves unable to spend their allocations. At which point those funds may become available (if not carried forward to the following year).

4iii. As mentioned above the percentages will be regularly reviewed.

5. Government regulation stipulate that only the collecting council can utilise the 5% administration cost allocation. CIL cannot be used to support salary costs and needs to be spent on infrastructure items only.

	<p>the 50% identified in the Table 2; i.e. the 50% is an indicative level as opposed to a ceiling.</p> <p>iii. After the 2nd anniversary of any removal of Education infrastructure from the List – the allocation percentages are further reviewed. (The reason for the 2 years post removal is to allow for the pipeline developments where CIL-limited S106 mitigation is relevant).</p> <p>This would enable VWHDC, working with the County Council (&amp; other parties) to optimise the infrastructure delivery to support the housing growth and potentially agreeing to a larger proportion of CIL use on schemes where other potential CIL applications hadn't progressed sufficiently to satisfy an allocation by VWHDC.</p> <p>5. We suggest that both the County Council and CCG receive a contribution towards their extra administrative duties within the CIL regime in supporting housing delivery; equivalent to a proportion of the capped 5% administration allocation. We ask that the County Council receives from VWHDC the equivalent of one fifth of the 5%.</p> <p>6. We look forward to working with VWHDC officers in drawing together a Memorandum of Understanding for the allocation, monitoring and reporting on the use of CIL monies. As part of that collaborative working we would want to help review and refine where appropriate the CIL funding application form to ensure that it is administratively straightforward.</p>	<p>6. VWHDC officers looks forward to the continued co-operation we had so far on the Memorandum of Understanding, the monitoring and reporting of the use of CIL monies, as well as in refining the CIL funding application form.</p>
<p>The Oxfordshire Clinical Commissioning Group</p>	<p>Re: Draft Community Infrastructure Levy – Spending Strategy</p> <p>Firstly, may I take this opportunity to thank The Vale of White Horse District Council (VOWH) for engaging with the Oxfordshire Clinical Commissioning Group (OCCG) regarding the proposed draft for the CIL Spending Strategy.</p> <p>To confirm the OCCG commissions health care services to all residents registered with an Oxfordshire GP.</p>	<p>Thank you for the positive feedback.</p> <p>We look forward to working with OCCG as we move forward with the Memorandum of Agreement and the project implementation phase.</p>

We are pleased to note that VOWH recognises that both large scale housing developments planned across the District and smaller windfall sites will have a direct impact on our local health services, in particular the local primary care facilities.

Having read the draft CIL policy and understanding the complexities it has taken to arrive at this juncture the OCCG wishes to make the following comments and is essentially in agreement with this approach to the suggested percentage allocation of these funds.

Using CIL funding where the development has occurred makes sound sense. It gives the OCCG an opportunity to plan and support infrastructure and estate where it is required and where the population has grown.

The proposed reporting system gives good governance so that it can be seen how funds are used in an effective and timely manner.

The suggested amount of 20% towards health care is considered to be a fair, reasonable and a proportionate amount and in accordance with the likely future demand on health services. Furthermore, the OCCG recommend that this figure remains as currently proposed within the draft Spending Strategy as this passes through your own committee structure.

We are also pleased to note that CIL funds would be allocated to other infrastructure providers, particularly, the improvement of disability access for local sports and leisure facilities.

In our opinion a percentage allocation system will work much more effectively than a bidding system and gives greater transparency on how CIL funds are used.

The OCCG is very keen to continue working closely with VOWH to ensure that the wider strategic implementation of health services across the District reflects the needs of the new households whilst supporting the current residents.

	<p>Please note that the Memorandum of Understanding would also need to pass through our committee structure for formal approval.</p> <p>We look forward to working with you and continuing this dialogue to support the health needs of the VOWH residents.</p>	
<p>Active Communities Manager - Community Services, Vale of White Horse District Council</p>	<p>Welcome the 20% contribution for sport and leisure however more clarity is needed on the CIL 123 list and whether it is the best solution for Vale?</p> <p>There is an assumption that under strategic open space this includes outdoor sports pitches this needs to be stated in the CIL 123 list. Where for example would CIL fund new provision or improved outdoor playing pitches or artificial training pitches? This needs clarify specifically as maintenance is excluded from investment.</p> <p>Re the CIL split the OCC contributions should also include Libraries and CCG contribution should include Adult Day Care.</p>	<p>Thank you for this feedback.</p> <p>By the CIL 123 list we assume you mean the regulation 123 list, which is a broad outline of what can be spent with CIL funds. Agreed the list is quite broad in its statements but is stated as such so that all sports activities, such as outdoor pitches, are covered within the definition.</p> <p>The Active Communities department are positive that they can use their CIL funding to attract matching funding and as such are looking for a “multiplier effect”.</p> <p>Unfortunately CIL cannot support everything, and some prioritisation has to be made. Libraries as such have been excluded. And CCG will use their funds predominantly for supporting health practices.</p>

<p>Energy Strategy and Projects Officer, Corporate Services, Vale of White Horse District Council</p>	<p>CIL funding should also be allocated for essential energy infrastructure, which does not seem to be part of the categories listed.</p> <p>This could include: electric vehicle charging renewable energy infrastructure private wire networks battery storage heat networks</p> <p>This infrastructure is required to meet the objectives of the Oxfordshire Energy Strategy adopted December 2018</p>	<p>Thank you for this feedback.</p> <p>Agreed, this has been omitted from the regulation 123 list. The CIL funds will be used to support environmental issues in that the bio-diversity activities of the council will receive CIL funding. Again, CIL cannot support everything, the amounts involved are relatively small, and some prioritisation has to be made.</p>
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## APPENDIX B

4. A copy of the email notification sent to all consultees.

Dear Sir / Madam,

We are inviting comments on our draft Community Infrastructure Levy (CIL) Spending Strategy, which sets out how we think the council should allocate CIL revenue. The strategy has been formulated so that funds from CIL go towards the infrastructure that new housing developments need, such as roads, parks, community and health centres and schools.

You can view the strategy and a short summary with some background information [here](#).

**To provide your comments on the CIL Spending Strategy, please visit:**

<https://survey.southandvale.gov.uk/s/VALECIL/?m=35207368s7ajs>

**Responses must be submitted by 5pm on Monday 11 February 2019.**

Once the consultation is complete, we will publish a summary report on the feedback received and the council's response to any main issues or suggestions received. Only the names of organisations submitting responses will be included in the report, not individuals. Consultation data will be deleted after the report has been published.

Feedback received from the consultation will be considered when preparing the final version of the strategy.

For more information about the consultation, to view the strategy and/or submit a response form in an alternative format, please email [haveyoursay@southandvale.gov.uk](mailto:haveyoursay@southandvale.gov.uk) or call **01235 422600**.

Kind regards

Nicola Wyer  
Community Engagement Officer, Vale of White Horse District Council

**This link is uniquely tied to this survey and your email address. Please do not forward this message.**

If you do not wish to receive further emails from us, please click the link below, and you will be automatically removed from our mailing list. Please note, we may still need to contact you for certain consultations if we have a legal obligation to do so.  
<https://survey.southandvale.gov.uk/s/VALECIL/?m=35207368s7ajs&optout=1>