

West Parley Parish Council  
**Community Infrastructure Levy Consultation**

Our comments on the Consultation are as follows:-

It looks like the Council has taken excessive account of developer comments to reduce the level of CIL to be claimed. This proposed reduction will place a further burden on other funding sources and will reduce the opportunity for negotiation when draft plans are submitted.

The amendments propose a reduction of residential CIL from £100 to £70 and reduction of the residential charge for New Neighbourhoods with a SANG provision from £100 to £0. Would have it not been better to leave the original figures in place and insert a section to give Planners flexibility to make amendments as required when specific housing proposals are submitted, perhaps even stating that the CIL rate is between £100 and £0 depending on site specifics.

These changes assume that all schemes are deliverable yet the analysis is based on historic desk top exercises to create a potential scheme that could be revised significantly following later detailed site investigation. This could mean that some sites are not deliverable as originally planned. This is a reality and should be the preferred route rather than amend the figures so that all schemes are deliverable.

The developers will negotiate the best deal for themselves and to offer an extension of CIL payment by the developer from 365 days to 720 days to ease developer's cash flow seems generous. Development sites are not individually funding and will be funded from reserves and external funding sources. The role of the developer is to ensure their own business cash flow is robust and this responsibility should not be shared with the Council.

Recently public housebuilding companies are clearly showing improved levels of profitability so most are now in a better financial position to fund large developments without further incentives.

New rules have been issued by the Government in the last few months that have an impact on the current proposals.

It is assumed that these proposals have the support of East Dorset and Christchurch Council Councillors before being released for public consultation.

From the comments made by DCC on the draft document, they have made clear that they have major concerns about the potential funding gap for the schemes that the current proposed amendments will make even worse.

Cllr John Cullen  
Chairman  
West Parley Parish Council  
31.12.14