



WEST OXFORDSHIRE
DISTRICT COUNCIL

West Oxfordshire District Council

Community Infrastructure Levy (CIL) Summary of Representations Report 2024

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I. INTRODUCTION

- 1.1 West Oxfordshire District Council is seeking to introduce the Community Infrastructure Levy (CIL) into West Oxfordshire. CIL is a charge (£ per m²) placed on certain forms of development to help fund the general infrastructure needed to support the planned growth of an area.
- 1.2 Despite several previous public consultations, CIL has not been adopted in West Oxfordshire and so last year, Members agreed that work should be recommenced with a view to taking forward a new CIL draft charging schedule.
- 1.3 CIL is intended to operate alongside traditional planning obligations (e.g. Section 106 legal agreements) which will continue to be used but in the future will focus primarily on affordable housing and site-specific infrastructure that is directly related to and needed to mitigate the impact of a development.
- 1.4 The purpose of this consultation statement is to summarise the key issues that were raised as part of the consultation and to set out the Council's response and changes, where applicable.
- 1.5 This consultation statement will be submitted alongside the CIL draft charging schedule and other supporting evidence including the Council's accompanying viability assessment.

2. BACKGROUND

Consultation Dates

- 2.1 The DCS was published for an 8-week period of public consultation from Friday 2 August to Friday 27 September 2024. Copies of the consultation documents were made available on the District Council's website, at the Council's town centre shop and at local libraries across the District.
- 2.2 All parties held on the District Council's planning policy database including statutory and non-statutory consultees and those who had responded to previous CIL consultations were notified in writing (either by letter or email) and invited to respond.

Responses received

- 2.3 Representations were received from 96 individuals and organisations. This included responses from other local authorities, statutory bodies, developers and agents and Town and Parish Councils. Attached at Appendix I is a schedule of representations including a summary of the comments received.

Key issues arising and District Council response

- 2.4 Table I below summarises the key issues that emerged through the DCS consultation grouped into themes for ease of reference. The Council's initial response to each issue is also provided including whether any changes are proposed. This should be read in conjunction with the full schedule of representations and responses attached at Appendix I.

Table 1: Summary of Key Issues (DCS)

Key issue	Council's response/course of action
Proposed rates	
Strategic sites should be charged CIL as this will undermine the effectiveness of CIL.	<p>The nil-rate is based on the Council's updated viability evidence and assumes that large strategic sites will continue to enter into planning obligations in order to secure affordable housing and necessary site-specific infrastructure needed to mitigate the impact of development. Based on this, CIL was found to be unviable.</p> <p>No amendments proposed.</p>
Strategic sites should remain exempt on the basis of high S106 costs.	Comment noted.
The proposed CIL rates are too low.	<p>It is important that CIL rates are set at a level that does not hinder new development coming forward, striking an 'appropriate balance' between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process.</p> <p>No amendments proposed.</p>
Higher rates for previously developed land should be applied, in line with other neighbouring districts.	The proposed rate for residential schemes on previously developed (brownfield) sites is lower (£125 per m ²) than greenfield sites because of the additional costs associated with bringing such sites forward.

Key issue	Council's response/course of action
	No amendments proposed.
Elderly persons housing should also have a 'nil rate' as they have less impact on infrastructure.	<p>A large proportion of elderly persons homes will fall under flatted only development which will only pay a nominal charge. However, elderly persons housing does have an impact on many types of infrastructure including water, sewerage and healthcare.</p> <p>No amendments proposed.</p>
The proposed rates for 11 plus homes have increased significantly compared to the previous rates proposed with little justification.	<p>The proposed rates are based on up-to-date viability evidence which found that greenfield residential sites across the District can accommodate £225psm whilst still providing a viability buffer. A lower rate of £125sqm is proposed on brownfield sites in recognition of the higher costs associated with the land value and remedial works.</p> <p>No amendments proposed.</p>
Differential rates for affordable housing means that not all greenfield sites should be treated equally for the purposes of CIL	<p>This is based on the Council's updated viability report which provides evidence that a fixed rate can be applied across all greenfield sites to provide simplicity and certainty for developers when calculating the rates.</p> <p>No amendments proposed.</p>
The proposed CIL rate for greenfield sites appears generally higher than adjoining authorities in Oxfordshire.	It is important to note that CIL rates are not set with regard to the rates used in other areas and instead are based on local evidence of viability which varies from place to place.

Key issue	Council's response/course of action
	No amendments proposed.
Concerns that small development sites will be disproportionately affected by the introduction of CIL.	Schemes of 10 or less dwellings make no on-site affordable housing contribution which can have a significant effect on gross development value. Therefore, the Council's viability evidence concludes that small-scale sites are able to make a CIL payment. No amendments proposed.
Flatted developments should be charged a higher rate in line with neighbouring authorities.	CIL rates are based on local evidence of viability which varies from place to place. No amendments proposed.
A nil rate charge for town centre retail will help regenerate these areas.	Only large format retail is proposed to be charged so smaller retail units which are often town centre based will be nil rated. No amendments proposed.
Some profitable businesses could pay for CIL which are currently proposed to be nil rated.	It is important that CIL rates are set at a level that does not hinder new development coming forward, striking an 'appropriate balance' between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process. No amendments proposed.

Key issue	Council's response/course of action
<i>Collection/ spending/ monitoring of CIL</i>	
<p>More guidance required regarding the release of CIL funding once implemented.</p> <p>Further information should be provided to explain what CIL can fund.</p>	<p>Comment noted and further information will be released at the appropriate stage.</p>
<p>More transparency and simplicity sought regarding the calculation and spending of CIL funds.</p>	<p>Noted and more information will be prepared regarding the spending of CIL at the appropriate stage.</p>
<p>Information sought on estimate of total funds likely to be raised from CIL.</p>	<p>Noted, this will be prepared by the Council at a later date and made publicly available.</p>
<p>More information should be provided to explain how the Council will monitor CIL.</p>	<p>Noted and agreed that a monitoring strategy will be prepared and made publicly available.</p>
<p>CIL will need to be regularly reviewed.</p>	<p>The District Council will keep its charging schedule under review to ensure that levy charges remain appropriate over time. The Council may seek to review its charging schedule in whole or in part taking account of relevant considerations including changes in market conditions and infrastructure needs.</p> <p>The Charging Schedule will be reviewed to take account of the policies of the emerging West Oxfordshire Local Plan 2041 once it has been adopted.</p>
<p>A CIL Spending Strategy should be developed to decide how CIL is spent on County Council projects.</p>	<p>Noted and agreed that this will be prepared in liaison with Oxfordshire County Council.</p>

Key issue	Council's response/course of action
The proposed instalments for development with a CIL liability of less than £100,000 should be delayed until at least 180 days of commencement.	Comment noted and this will be considered further as part of the Council's Instalment Policy which has yet to be produced. The Council's approach to this will be informed by reference to other charging authorities' practice/experience.
Concerns raised regarding the 5% administration fee.	CIL administration funds require 5% of CIL monies received be retained for administrative fees. This is not set by the Council.
<i>Viability assumptions</i>	
The viability assumptions are inappropriate relating to gross land values, build costs, profit allowances and other allowances. As a result, the £225 psm rate is unviable.	The representation points have been reviewed, and the VA assumptions sets. Sensitivity testing and findings are considered to have been appropriately placed, weighed up and applied. Appropriate viability and related reviewing and further CIL development work has led to a suitable and robust set of proposed CIL charging rates, in accordance with the guidance and how this is applied in practice, and leading to the striking of an overall balance suitable for the purposes in West Oxfordshire. No amendments proposed.
The allowance for residual S106 costs is likely to be much too low.	It is acknowledged that the level of residual s106 alongside a CIL will vary depending on scheme specifics. However, this could move either way relative to the assumptions made, as could other factors, and it is not appropriate to view this assumption in light only of a pre-CIL context. The VA includes a wide range of sensitivity testing and adopted a buffered approach in offering recommendations for workable CIL charging rates, as are proposed. There is scope for higher costs to be supported where

Key issue	Council's response/course of action
	<p>this may be required and without unduly impacting the ability of schemes to come forward viably overall.</p> <p>No amendments proposed.</p>
<p>The assumptions in respect of affordable housing revenues are not accurate.</p>	<p>Consistent with the approach taken throughout, the assumptions are suitably pitched. They reflect experience of how these matters have operated on a wider view of this established mode for directly securing affordable homes - and in many similar assessments. The variability of particular assumptions is noted, but as a common thread throughout this it is necessary to take a balanced rather than a potentially overly cautious stance on assumptions. The more strategic purpose is to be reflected and, in striving for that, the balance to be struck between the desirability of funding infrastructure and the potential effect on viability locally is key.</p> <p>No amendments proposed.</p>
<i>Exemptions</i>	
<p>The Council should offer discretionary relief.</p>	<p>Whilst the Council will offer mandatory relief from CIL it does not currently intend to offer discretionary relief such as exceptional circumstances relief.</p> <p>The proposed CIL rates have been set well within the margins of viability which should help to avoid the need for discretionary relief from CIL being sought.</p> <p>This position will however be kept under review.</p>

Key issue	Council's response/course of action
	No amendments currently proposed.
There are too many exemptions such as self-build housing which should not be exempt.	Only mandatory relief is currently proposed which the Council is obliged to offer.
The Council should be aware of the implications of any CIL rate on the conservation of the historic environment and heritage assets which could make works unviable.	<p>The proposed CIL rates have been set well within the margins of viability in most cases. This position will however be kept under review. The Government's practice guidance states that the powers to offer relief can be activated and deactivated at any point after the charging schedule is approved and as such the Council will continue to consider whether there is a need to offer this or any form of discretionary relief from CIL through the monitoring and review of CIL.</p> <p>No amendments currently proposed.</p>
<i>Parish Council funding</i>	
Parish Councils should receive a higher percentage of CIL funding.	15% of the CIL payment is passed to parish councils without a neighbourhood plan. If an up to date Neighbourhood Plan is in place, a parish council would receive 25%. This rate is outside the control of the Council.
Concerned about the cap for money transferred to parish councils.	The cap referred to (£100 plus annual indexation), is based on the number of existing dwelling within the parish. It is not based on the number of dwellings proposed through development. A minor non-material amendment is proposed (see Statement of Non-Material Minor Amendments) to clarify this point.

Key issue	Council's response/course of action
General	
General support for CIL on the basis that it will help pay for infrastructure	The support expressed for the introduction of CIL is welcomed.
General concerns raised towards CIL on the basis that an additional tax will be a burden to development, it will increase house prices and reduce affordable housing contributions	Comment noted. It is important that CIL rates are set at a level that does not hinder new development coming forward, striking an 'appropriate balance' between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process. The introduction of CIL should not affect house prices and will not alter the affordable housing requirement.
CIL is premature due to proposed changes to the NPPF. This should be delayed until after the adoption of the emerging Local Plan	It was considered and agreed by the Council's Members that progress should be made on CIL at this stage rather than waiting for the adoption of the emerging Local Plan as they will create further delays. CIL will be reviewed again once the emerging Local Plan 2041 has been adopted.
There have been too many delays in the introduction of CIL.	Understood and agree that due to a number of circumstances as set out in the background section of this report, there have been a number of delays, many of which have been unavoidable and outside the control of the Council.
CIL needs to be supported by an up-to-date Infrastructure Delivery Plan	The draft charging schedule is based on the policies of the adopted West Oxfordshire Local Plan 2031 and supporting evidence base including the Infrastructure Delivery Plan (2016). The Council is in

Key issue	Council's response/course of action
	<p>the process of preparing a new Local Plan covering the period to 2041 but that remains at a relatively early (Regulation 18) stage. The new Local Plan will be supported by an updated IDP but that too remains at an early stage.</p> <p>The Council intends to review its CIL charging schedule once the new Local Plan has been formally adopted.</p>
Developers should pay for infrastructure needs in full.	Comment noted and developers are required to mitigate the impacts of their development through contributions via a legal agreement which provide the site-specific infrastructure necessary to serve the development.
There will be a long lag between receiving funds and spending on infrastructure.	Comment noted. This will depend on the infrastructure to be funded and the cost of the infrastructure. Once CIL is established and a funding pot has built up, the lag time will reduce.
General misunderstanding by some respondents that CIL replaces S106 contributions.	The intention is for CIL to operate alongside legal agreements. As such, CIL will complement S106 Agreements rather than replace them as they will still be necessary to fund affordable housing and site related infrastructure on medium/ larger sites.
CIL funding should be made available for local, more directly impacted infrastructure where the impacts are felt. The money should be spent within the locality of the development.	Comment noted. Further consideration will be given to the type of infrastructure to be funded by CIL at the appropriate stage, but the intension would be for this infrastructure to benefit local residents.

Key issue	Council's response/course of action
Applicants should not have to complete overly complicated forms to demonstrate an exemption	Noted and agree that the process should be simplified as far as possible.
A glossary of terms should be included to avoid misinterpretation.	<p>Comment noted and agreed that this would add value.</p> <p>A minor non-material amendment is proposed in this respect (see Statement of Non-Material Minor Amendments).</p>

3. Next Steps

- 3.1 This consultation statement will be submitted for examination alongside the Council's draft charging schedule and other supporting evidence. It is anticipated that the charging schedule will be examined in Spring 2025.
- 3.2 Depending on the outcome of the examination process, it is anticipated that CIL will be formally introduced in West Oxfordshire in the summer of 2025.

4. Sources of Further Information

- 4.1 The following web links provide useful information on CIL in general and the Council's development of its proposed CIL charging schedule.

Legislative/Policy Context

Localism Act (2011)

<http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

CIL Amendment Regulations (2019)

<https://www.legislation.gov.uk/uksi/2019/1103/contents/made>

Guidance

Planning Practice Guidance

<http://planningguidance.planningportal.gov.uk/blog/guidance/community-infrastructure-levy/>

Planning Advisory Service (PAS)

<http://www.pas.gov.uk/community-infrastructure-levy>

CIL in West Oxfordshire

Draft Charging Schedule consultation

<https://www.westoxon.gov.uk/planning-and-building/community-infrastructure-levy/community-infrastructure-levy-examination/>

Appendix I – Schedule of DCS consultation responses *(in no particular order)*

Respondent Name	Organisation	Representation in full	Summary of representation
Maurizio Fantato	None	No comment made	No comment made
Dr Philip W Fowler	None	I am commenting as an individual although have previously been a Chair of Governors of a primary school in Witney; during my tenure I was dismayed to see a proposed development (in Witney East which is a strategic area) appear to reduce the number of houses as if to avoid the need to build an additional school via Section 106. The CIL, be being virtue of being a simple per-m2 charge, seems to therefore be a good idea, although I am concerned that the statement that the funding to provide e.g. additional schools for housing built in the Strategic Areas may be somewhat naive and optimistic.	A positive comment about the CIL being a simple per-m2 charge. The respondent had some concerns that funding to provide infrastructure in strategic areas may be naïve and optimistic.
Trevor Hames	None	I disagree with any additional charging. This will only add to building costs. From my limited experience I don't see good use of the s106 monies.	The respondent disagrees with the charge as they believe it will add to building costs and they have not seen good use of S106 money.
Hendrik Gouws	None	I do not approve- this is absurd in a heavily taxed community.	The respondent is against the introduction of CIL as they perceive it as additional tax.

Respondent Name	Organisation	Representation in full	Summary of representation
Matthew Lonsdale	None	I think it is a good idea to raise more money in order to fund community infrastructure improvements. If people were aware that investment into infrastructure, such as schools or doctors would happen as a result of development, then they would be more acceptable towards development which is needed to solve the housing crisis and grow the economy.	In favour of CIL to fund community infrastructure, such as schools or doctor's surgeries.
Martin Wareham	None	No comment made.	No comment made.
Peter Hopkins	None	Can the CIL be used to support failing infrastructure such as that which should be provided by Thames Water? How does the definition by the new government of "grey space" factor into the current definition of CIL rates?	Questions asked about how CIL can be used to support existing infrastructure and clarification on the definition of 'grey space'
Nicola Burnett-Smith	None	As a member of the community who has obtained planning permission for one 3 bedroomed house - an energy efficient home - I feel that the CIL just adds more cost to an already prohibitively expensive procedure of gaining planning permission and then all the other costs associated with the build BEFORE we have even started our project. The government is making it virtually impossible for individuals to build sensibly sized homes on plots of lands in towns and cities. You can only afford to do this if you are rich or are a property	Opposed to CIL for small 1 or 2 houses projects – it should only apply to projects with more than 2 houses.

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>developer. I am opposed to CIL for anyone undertaking a small 1 or 2 house project. CIL should only be applicable to housing projects over 2 homes.</p>	
Mr Joseph F Wallcraft	None	No comment made.	No comment made.
Tony Chalkly	None	I have no comment to make as this is outside of my scope.	No comment made.
Guy Phillip Austin	None	<p>This is yet another stealth tax which developers will just pass on. On the one hand authorities say they want to make housing affordable whilst on the other via section 106 and now CIL all that is happening is housing is being made more expensive. In the meantime council salary bill and pension bill goes up and up and up. Is the Council really representing our community or are you just meeting targets for central government . West Oxfordshire was and should remain a rural authority controlled via the Planning policies, CIL will not dissuade developers just increase price for consumers. If the Councils aspiration is to develop our rural countryside then it is for the Council and Central Government to provide the funds, not the already overtaxed population. If you can't afford it, don't do it, that's how the rest of us have to live, not get others to fund our aspirations.</p>	<p>The respondent is opposed to CIL as it will make it more expensive to build housing, the cost of which will be passed onto consumers. They feel that WODC should fund infrastructure associated with development.</p>
Fiona spencer	None	No comment made.	No comment made.

Respondent Name	Organisation	Representation in full	Summary of representation
Yvonne De Burgo	None	Charges to developers need to be higher. They can afford it and they should be made to the infrastructure too. Continuing payments to be paid for maintenance of roads, schools, Dr surgery's, and everything that they impact on!	The respondent is in favour of CIL and believes charges should be higher to fund infrastructure.
Richard William Outhwaite	None	An excellent idea, given the intolerable material and financial costs imposed on local people by speculative and irresponsible development under the previous regime.	The respondent is in favour of CIL to reduce financial costs to the local population.
Professor Peter Charles Hills	None	It appears sensible and necessary to the maintenance of essential infrastructure, particularly education, medical services, sewerage, and sport and leisure in the area affected by development.	The respondent is in favour of CIL to maintain infrastructure which is affected by development.
Graham Martin Smith	None	I welcome the proposal to require developers to contribute to the cost of improvements to the infrastructure that makes their development possible. The infrastructure in the Witney area has been overwhelmed by the developments that have already taken place and without support from those benefiting from additional building will continue to decline. The only question that needs to be asked is why this is not already in place.	The respondent is in favour of CIL, to support local infrastructure which they perceive as having been overwhelmed by development in Witney.

Respondent Name	Organisation	Representation in full	Summary of representation
Mark Morley	None	As someone who has never heard of CIL, and after reading the section titled "What is CIL?", I have no idea whom the charge is targeted towards (developers or local residents/rates payers). In other words, who pays the charge?	Questions whether it is developers or local residents who pay the CIL charge.
David Miles	First and Last Mile	<p>Public transport has always accounted for a small percentage of section 106 contributions and I am sure this will not change with CIL. My first concern is that the large developments in West Oxfordshire which would generate the most income are exempt from CIL because this seems to undermine its effectiveness.</p> <p>WODC are not responsible for subsidising bus services in the area, which is the preserve of Oxfordshire County Council. It is not clear how CIL would benefit public transport though I note that transport is specifically included. This may be down to a lack of understanding on my part as to how the system works of course. I would be interested in any relevant explanation.</p> <p>One existing problem with section 106 is that parishes cannot spend the money as they see fit. In Stanton Harcourt there has been major development but little provision made to improve bus services because at the time of the agreement there seemed little prospect that bus services would return. When the development actually happened therefore money was not available to support the bus service despite policy being to the contrary. Will CIL help to correct this problem and see an improvement in district bus services as a result.</p> <p>CIL payments will be pooled which presumably means that developments will generate CIL but not necessarily benefit from it. I support having greater flexibility in the system as section 106 is very restrictive in its conditions. I also</p>	<p>The respondent is concerned that larger developments are exempt from CIL as they would generate the most income, which then undermines its effectiveness.</p> <p>The respondent is unclear how public transport will benefit from CIL and would be interested in further clarification.</p> <p>The respondent highlights that S106 money cannot be spent as Parish Councils see fit. They would like to know if CIL will help to correct this?</p> <p>The respondent likes the greater flexibility that CIL provides but on the downside, this means that</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>like the idea of giving a say to Parish Councils as to how monies could be spent. Not sure that one does not contradict the other however.</p> <p>This is the early stage of public consultation and whilst I appreciate that this is a somewhat dry subject I would suggest that there is a need for extra information to be provided so that a more considered response is possible. CIL has proved to be valuable elsewhere so I think could provide valuable additional funding but remain unclear as to the mechanics of it. I would also suggest that Parish Councillors would need guidance as to how they would spend any proportion of CIL funding.</p>	<p>developments which generate CIL may not benefit from it.</p> <p>The respondent would like more information about CIL and the mechanics of it. They believe that Parish Councils would need more guidance in how they would spend CIL.</p>
Katie Welka	None	<p>I do not have faith in the council to spend this additional income appropriately and transparently, so it is tragic that WODC has decided to move forward with CIL. I cite Witney's festering half-closure of the high street as one example and Eynsham Park & Ride as another example of why confidence is lost.</p> <p>Commenting on the fee schedule, I see gov.uk states, "When deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments.</p> <p>This balance is at the centre of the charge-setting process. In meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area (see regulation 14(1), as amended by the 2014 Regulations)."</p> <p>The explanation of how these fees will be used in the proposed schedule is generic at best. Clicking the provided link in the schedule to see the</p>	<p>The respondent is not supportive of CIL. She does not believe that WODC will spend the money transparently and appropriately.</p> <p>She states that the balance between additional investment and the impact on viability is at the centre of the charge-setting process.</p> <p>The charging authority should be able to show and explain how their proposed levy rates will</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>Infrastructure Funding Statement provided only minimal detail, citing some specifics for one town (Eynsham). The IFS then linked on to an 8 year old document:</p> <p>“The District Council’s future spending priorities for new and enhanced infrastructure in West Oxfordshire are set out in an Infrastructure Delivery Plan. The West Oxfordshire Infrastructure Delivery Plan (IDP) 2016 (opens as a PDF) is in the process of being updated.”</p> <p>You haven’t made a new infrastructure delivery plan in 8 years? This does not fill me with any confidence that these fees were grounded in a specific plan. There is no written plan. The public cannot be expected to comment on a fee schedule where no reference is available to how these fees are justified or are to be used.</p> <p>I think the fee itself is exorbitant and will further fuel the “two-up, two-down” eyesore development that has spread like a disease in this country and will swallow the Cotswolds. The cost will be passed down to the home buyer in an already inflated market.</p> <p>We already rank in the highest council tax charges in the country. The money that council tax brings in with each new family who moves into these new homes should be plenty without inventing new fees.</p> <p>I ask members of the council to look around their own homes and ask themselves whether they would or could have spent an additional £125-225 per sqm when they purchased it. Again, I stress that these fees will not result in lower profit for developers. They will simply cut more corners or raise the housing price.</p>	<p>contribute towards the implementation of their relevant plan. The explanation of how these fees will be used in the proposed schedule is generic at best.</p> <p>She believes that the infrastructure delivery plan is out of date and that the public cannot be expected to comment on a fee schedule where no reference is available to how these fees are justified or are to be used.</p> <p>She believes that the fees are too high and will be passed to the home buyer, not result in lower profit for developers. She states that there are already high council tax fees and that this money should be enough.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		In closing, I refer back to the gov.uk statement that we should see a plan for these levies. A plan written in 2016 is simply too old to be relevant.	
Simon Verschueren	None	No comment made	No comment made
Susan Shayler	None	Developers will only add this charge to the house purchaser resulting in new houses becoming more and more expensive and consequently out of reach for many ordinary residents. It would be fairer to increase the rates as all residents will ultimately benefit from infrastructure improvements.	The respondent is opposed to CIL as they believe that developers will add the charge to new houses making purchasing a house out of reach for many residents.
Will Quartly	None	It's a good idea but there will be too much of a time lag between developments commencing and any infrastructure improvements. Developers have 60 days after commencing to pay, once that funding becomes available it would take years to plan and build/improve schools/transport/flood defences. The ultimate flaw in the scheme is that it does not tackle the biggest strain on infrastructure that new development causes, the increase of sewerage on an already broken system. More needs to be done to put pressure on the water companies to sort this out.	The respondent generally supports CIL but believes that there is too much of a delay between the commencement of development and any infrastructure improvements. It therefore does not tackle the strain that new developments place on

Respondent Name	Organisation	Representation in full	Summary of representation
			infrastructure, such as the sewer system.
Paul North	Sandford St Martin Parish Council	<p>I understand the need for this levy. However there is a lot of complexity in the associated documents that determine what the impact of the levy is on specific developments. I sit on a parish council and wonder how parish councils can understand if and how a proposed levy will be applied to a development within their parish and what the proposed use of the funds raised would be. Can there be a specific briefing for parish councils to explain, simply and clearly, how and when this levy will be applied, how to be heard when it comes to consideration of infrastructure needs and how to engage in infrastructure developments that impact their parish.</p> <p>I also note that some the levy will be passed down to the parish council. This is clearly welcome. But it seems only the parish where the development takes place will receive monies. The types of developments that will attract this levy will probably have impacts across neighbouring parishes. So how and where infrastructure development takes place should be considered more broadly. After all parish boundaries do not typically determine infrastructure needs.</p>	<p>The respondent is generally in support of CIL but suggests that it is a complex process and potentially difficult for Parish Councils to understand how a levy will be applied to a development in their parish and what funds raised could be used for.</p> <p>The respondent requests a specific brief for Parish Councils to explain how and when the levy will be applied, how to be heard when it comes to infrastructure needs and how to engage in infrastructure developments that impact their parish.</p> <p>The respondent notes that CIL money will only be given to Parish Councils</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			where the development takes place and that impacts on infrastructure for neighbouring Parish Councils should also be considered.
Catherine Smith	None	<p>Surely, it would be much more effective and efficient to refrain from adding further layers of bureaucracy to the planning process????? Multiple channels for charging infrastructure levies can only lead to - errors - confusion and, as has happened in other Council Districts, having to repay wrongly collected charges. Why not focus attention of using one REALIST charging method. S106 charges exist to (in theory) claim contributions from developments for infrastructure improvement. S106 charges on a recent 40 home development in Aston for bus service improvement was a ridiculous £45 thousand pounds. WE HAVE SEEN NO IMPROVEMENT TO OUR 2 HOURLY BUS SERVICE FROM THIS, OR PREVIOUS DEVELOPMENT CONTRIBUTIONS AND WERE TOLD DURING A RECENT PLANNING APPEAL THAT THIS MONEY GOES INTO AN OXFORDSHIRE POT OF MONEY, WHICH HAS NOT BEEN SPENT HERE, OR ANYWHERE ELSE.</p> <p>Rather like the 'two pot' road repair system, rather than one pot for addressing what is critical, this proposal will add confusion, inefficiency and waste time and money you claim you already do not have.</p>	<p>The respondent believes that one charging method would be more efficient and effective to avoid errors and confusion.</p> <p>They make a note of developments where S106 money has been generated but not spent on infrastructure that they believe is needed.</p>
Morag Keen	None	I support the proposal	The respondent supports CIL.

Respondent Name	Organisation	Representation in full	Summary of representation
Catherine Scutt	None	This seems like an excellent idea, yes please.	The respondent supports CIL.
Tony Daly	None	<p>I have discussed CIL with a competent experienced local government official from Tandridge in Surrey.</p> <p>In brief summary, the worst issues they find are getting payments in a timely manner, coupled with the effort to chase these payments.</p> <p>Essentially the scheme should be set up to enforce timely payment, whether single or staged, else the assumed benefits will leak away. One option would be to integrate into the Planning process.</p>	The respondent notes concern regarding the timely payment (and chasing of payment, where necessary) of CIL. They believe that payment should be built into the planning process.
Russell William La Forte	None	<p>What's Taken So Long? CIL was introduced by the Planning Act 2008, and yet 16 years later, WODC still do not have a charging schedule in place. Developers are no doubt absolutely delighted - perhaps this has been another incentive for the rampant, speculative (over)development in the District in recent years, including our Parish? To compound the criticism of WODC, draft CIL consultations such as the current have been conducted 4 times previously - in 2014, 2015, 2017 and 2020 - and yet no schedules were subsequently adopted. This is a shocking state of affairs, and what confidence can we have that this time will be any different?</p> <p>Funding Gap. According to their 2022/23 figures, WODC require between £192.2million and £198 million for supporting infrastructure. Against this requirement, a mere 1.5% - £2.9 million - of Section 106 contributions were collected by WODC (of which, only £1.2 million was actually spent). This makes the delay in CIL introduction all the more unforgivable, as well as</p>	<p>The respondent notes that CIL has been hugely delayed and consultations have taken place four times previously with no schedules subsequently adopted.</p> <p>The respondent suggests a funding gap between the high infrastructure needs of WODC and the low amount of money raised by S106 contributions. They suggest that transparency</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>highlighting the obscene imbalance between developer profits and community infrastructure needs. Whilst the paper proposes charging rates, there seems to be no calculation/estimate of the total amount WODC hopes to raise. Such greater transparency would be both helpful and welcome. Even so, I suspect that even CIL will be a drop in the funding gap ocean.</p> <p>Exemptions and Reductions. The consultation (para 3) is at pains to point out that the charging schedule must be carefully balanced so as not to hinder/dissuade new development (ie, minimised?). Why? If a development directly generates a need for new or improved critical supporting infrastructure (much of it already grossly overloaded) - then this must be paid for - by the developer. In other words, a basic principle must be that development should not be permitted if there is insufficient infrastructure to accommodate it. Notwithstanding this, and despite the funding gap, there are a number of inexplicable exemptions and reductions that let developers even further off the hook, for example:</p> <p>Strategic Sites Most notably, and wholly inexplicably, strategic sites - those that will create the greatest impact upon supporting infrastructure (including 2220 new homes at Salt Cross and another 1000 at West Eynsham) and the greatest profits for developers - are exempt from CIL altogether. The excuse given (para 3.3) is that the developer will already be making 'significant Section 106 contributions' and have other 'significant development costs'. This counter-intuitive approach simply beggars belief - except from the perspective of the developer's profit margins course. It also places smaller, more local developers (inevitably focused upon smaller projects not exempt from CIL) at a significant commercial disadvantage.</p> <p>Self-Build and Flats. Exempt. Why? A flat or self-build dwelling with 4 occupants for example, will create the same impact upon supporting infrastructure that a</p>	<p>around the total amount of money that WODC is hoping to raise through contributions would be welcome but they suggest that CIL contributions would not significantly reduce the funding gap.</p> <p>The respondent does not support exemptions for sites and that if a development develops a need for greater infrastructure, then they should be responsible for paying for it. They particularly disagree with strategic sites being exempt from CIL as they create the most impact on local infrastructure and the greatest profit for developers. It puts smaller development sites at a disadvantage.</p> <p>They also disagree with the exemption for self-builds and flats due to occupancy</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>'normal' dwelling with 4 occupants will generate.</p> <p>Brownfield Sites. The proposed rate for brownfield sites is lower than that for greenfield. One might think this is to encourage use of brownfield, but no. This is to mitigate the alleged additional costs that accrue to developers in developing brownfield sites. Again, the metric should rather be the impact that the development will have upon supporting infrastructure and the local community, rather than the impact upon the developer's profit margins.</p> <p>Discretionary Relief. On a more positive note, there are some types of development where legislation allows a LPA to offer discretionary CIL relief. WE applaud WODC's current intention not to offer any discretionary relief. However, we note that WODC promise to keep this under future review. In which case, I encourage some moral courage and stiffening of their backbone to resist the inevitable whining from developers.</p> <p>Double Dipping. WODC should be prepared for developers to (inevitably) claim 'double dipping' - ie, being asked to pay for (the same) infrastructure twice (through Section 106 and CIL). The charging schedule and its supporting policy must be airtight in this regard.</p> <p>PC Share. We would say this, I suppose, but a mere 15% to those most directly impacted by the impact of new development seems parsimonious. Furthermore, even this 15% is capped at £100/dwelling - why? Even if legislation restricts WODC on these figures, then we should be assured that money that goes into the District funding pot is still accessible for local, more directly impacted infrastructure. Those who most directly bear the infrastructure impact should have priority, and there should be appropriate commensurate weighting afforded in the apportionment of CIL funds.</p>	<p>levels being the same as a house and for brownfield sites.</p> <p>The respondent supports WODC's current intention not to offer any discretionary relief and note WODC's intention to keep this under review.</p> <p>The charging schedule and its supporting policy must be airtight top avoid challenge from developers.</p> <p>The respondent suggests that proposed 15% share which would go to the relevant Parish Council is not enough for those who are most directly impacted by development. They would like reassurance that money that goes into the District funding pot is still accessible for local, more directly impacted</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			infrastructure.
Andrew Lanham	Black Bourton Parish Council	<p>It would be nice to see some definition on how far reaching the CIL payments would be. It states "local infrastructure", but how local? In Black Bourton we have been directly affected by developments in Carterton and Bampton, especially Carterton. We have seen a huge increase in traffic flow through the village which has had a detrimental impact on the quality of life for some of our residents. Noise pollution, air pollution and mainly speeding. If we had some CIL support maybe we could have reduced the impact these issues have on the village. Sewage from Carterton is dealt with at Black Bourton. This has led to an increase in Thames water tankers going through the village. Carterton's main burial facility is the graveyard in Black Bourton, this is now becoming full and new facilities need to be provided. Even things such as the playpark in Black Bourton are predominately used by residents from outside the village. No problem with that, would be nice to have some additional financial support to help maintain this asset.</p> <p>So the question is, how far reaching will the CIL payments be? I know there is a limit to what can be done, but we need to look further out and understand the wider impact on the surrounding areas.</p>	<p>The respondent would like clarification on how 'local' local infrastructure would be?</p> <p>They feel that additional CIL support would help to mitigate some of these issues.</p>
Deborah Phillips	Combe Parish Council	<p>Combe Parish Council is broadly supportive of this initiative. However, concern was expressed about the proposal to give preferential treatment in the allocation of CIL receipts to councils with an adopted Neighbourhood Plan in place.</p>	<p>The respondent is broadly supportive of CIL but has concerns about Parish Councils with adopted Neighbourhood Plans</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			receiving preferential treatment.
Alice Kirkham	Redrow Homes	<p>We support the zero-rate for strategic sites and the proposal to introduce an instalments policy for larger payments.</p> <p>Further to our response to the initial viability questionnaire in November 2023, we believe that a number of the assumptions used in the viability assessment remain unrealistic. It is not evident whether those assumptions have reflected the set of responses received to that initial questionnaire, but certainly in respect of our response that doesn't seem to be the case. We would like to specifically reiterate the following issues:</p> <p>1. The assumptions in respect of affordable housing revenues are now massively overestimating the values that affordable housing providers are making. Over the past couple of years AH revenues have seen a huge reduction based on a range of issues that the providers will be better placed to articulate. Our previous suggestion of a 45% of OMV blended rate across rented and discounted home ownership tenures is now looking generous when compared with the latest offers we have been receiving. There can be no basis for carrying forward the assumptions that currently appear in the viability assessment and we would request that these are reviewed (on the basis of valuation advice from the RPs themselves) as a matter of priority as this matter alone has the potential to have a significant bearing on the viability of development schemes going forward.</p> <p>2. The allowance for residual S106 costs is likely to be much too low based on the examples of nearby authorities that already have CIL in place (e.g. South Oxfordshire / Vale of White Horse, West Northamptonshire, Wycombe) where residual S106 costs regularly exceed £10,000 per dwelling.</p>	<p>The respondent supports the zero rate for strategic sites and the proposal to introduce an instalments policy for larger payments.</p> <p>They believe that a number of the assumptions made in the viability assessment remain unrealistic.</p> <p>The assumptions in respect of affordable housing revenues overestimates the values that affordable houses are making.</p> <p>The allowance for residual S106 costs is likely to be much too low where residual S106 costs regularly exceed £10,000 per dwelling.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>Finally, it would be useful if the Council could publish and keep regularly update a list of infrastructure items that are / intended to be funded wholly or partly from CIL.</p>	<p>The Council should publish a list of infrastructure items that are intended to be funded from CIL.</p>
Leslie Goble	Brize Norton Parish Council	<p>Although the S106 funding process is a good way to secure funds for Parish Council projects, we consider that it can be overly restrictive or too loosely detailed.</p> <p>The PC agrees that the funds should be 'ring fenced' for a particular project, but unless the Parish Council is involved in writing the relevant S106 agreement, then the whole rationale for the funding may not be realised.</p> <p>For example, we have a S106 fund to build a new sports pavilion but when it came to drawing down money to start the design and community consultation process, we were informed that the funds could only be used to construct the building rather than funding the whole project. This was not the original intent of the PC requirements.</p> <p>Likewise, we have a S106 fund for Public Art and in this case, we were allowed to draw down funds for community engagement! However, despite one project being hugely supported by the community and was for the betterment of our community (predominately school children from the old Brize Norton village and the new Brize Meadow development), because the S106 agreement was so loosely written, it fell to an officer to decide the 'interpretation of the funds use' and ultimately informing us that our project did not fall within the remit of Public Art. This is something the PC disagreed with.</p> <p>So we have two schemes, both of which are fully funded and for the benefit of the community. The first we cannot start until 2025/26 because it requires precept funding which was not budgeted for this year, and the second that we</p>	<p>The Parish Council is supportive of CIL.</p> <p>Agree that funds should be ring fenced.</p> <p>Spending of funds can be overly restrictive or sometimes can be open to interpretation which in both cases can make it difficult to spend CIL funds and cover all aspects of a community project.</p> <p>They request that for large developments, which take places over several years, that CIL payments are made in phases.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>are unable to deliver.</p> <p>With the above in mind, we fully support CIL funding as these funds will be passed to the PC as a lump sum and they, in conjunction with community consultations, will not only be able to decide which projects are important, but also the scope of the project.</p> <p>Our only request is that with large projects spread over several years (as we are potentially facing), is that the release of CIL funding is made in a phased approach so that projects can be delivered whilst the development takes place rather than wait until it is completed.</p>	
Jamie Harrison	None	<p>I believe that the CIL should contribute towards projects in the place where the development takes place, so rather than spending 106 money like recently on one project in Witney, the money should have been used to improve facilities for locals in the same place as the development</p>	<p>The respondent is generally supportive of CIL but believes that the money should be given to the place where the development took place, to improve facilities in that area.</p>
Cllr Sandra Cosier	Stanton Harcourt Parish Council	<p>Exemptions and Reductions:</p> <p>Though the parish council recognises that the charging schedule must be carefully balanced so as not to hinder/dissuade new development. It feels that development of any scale directly generates a need to for infrastructure and therefore should be charged accordingly. We support charitable exemptions where an owner has a material interest in any relevant land which is a charitable institution can claim relief and social housing. We object to the exemption of Self-build Housing as they too contribute to pressures on local infrastructure.</p>	<p>While the Parish Council is generally supportive of CIL, it feels that strategic sites should not be exempt as they have the greatest impact on community infrastructure. It also feels that as part of the new CIL all strategic sites, before commencing a</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>Strategic Sites: The parish agrees that all strategic sites should be charged. Strategic sites historically have the greatest impact upon community infrastructure in and around the area where they are built. We feel that as part of the new CIL all strategic sites, before commencing a development must serve a Commencement Notice on the local authority. If an exemption is being claimed, it will be important to have served a Commencement Notice before the development is commenced. Failure to do so will lose the exemption.</p> <p>Self-Build and Flats: We believe that self-builds and flats should not be exempt from CIL. Flats, though not occupying the same square footage as small developments do create a need to use local infrastructure. Also, we feel that individuals claiming the exemption must own and occupy the property as their principle residence for a minimum period of three years after the dwelling is completed.</p> <p>Brownfield Sites: We consider that CIL charging rates should reflect the lower build costs of greenfield land and higher infrastructure service costs of lower density more car dependent greenfield development. We feel that a well targeted CIL rate can help to promote brownfield development. A lower CIL rate should be applied for brownfield than for greenfield land development generally. This is logical as it reflects the additional costs of brownfield development and encourages developers to look at brownfield sites first rather than greenfield land.</p> <p>Parish Council's Share: It is our contention that all parish councils should receive at least 20% of CIL if directly affected by new development. The addition of new development in parishes conclusively puts pressure on sewage etc so parishes must receive</p>	<p>development must serve a Commencement Notice on the local authority.</p> <p>They feel that self-build housing and flats should not be exempt, as it still has an impact on local infrastructure. They also feel that individuals claiming exemption should then need to occupy the residence for at least 3 years after completion.</p> <p>They support charitable exemptions.</p> <p>They consider that a lower CIL rate should be applied for brownfield than for greenfield land development generally.</p> <p>All parish councils should receive at least 20% of CIL if directly affected by new development. The addition of new development in parishes conclusively puts pressure on infrastructure</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>their percentage of CIL in a timely manner and WODC must coordinate with parishes how and where receipts are spent. Parish councils should be allowed to spend CIL on these examples:</p> <ol style="list-style-type: none"> 1. Allotments 2. Litter bins 3. Monuments / memorials 4. Public Toilets 5. Provision of parking places for vehicles, bikes, and motorbikes 6. Seats / shelters / bus shelters 7. Signage / public notices 8. Community gardens/ open space 9. Children's play spaces 10. Tree Planting 11. Projects to improve the public realm, like bulb planting by residents, 12. The installation of defibrillators 13. Climate change / 'Green' projects 	<p>so parishes must receive their percentage of CIL in a timely manner and WODC must coordinate with parishes how and where receipts are spent.</p>
Guy Robinson	Historic England	<p>We encourage the Council in its CIL Charging Schedule to assert its right to offer discretionary CIL relief in exceptional circumstances e.g. where development which affects heritage assets and their settings and/or their significance, may become unviable if it was subject to CIL. In such circumstances, we urge local authorities to offer CIL relief and for the conditions and procedures for CIL relief to be set out in a separate statement following the Charging Schedule. The statement could set out the criteria to define exceptional circumstances and provide a clear rationale for their use, including the justification in terms of the public benefit (for example, where CIL relief would enable the restoration of heritage assets identified on Historic England's Heritage at Risk Register). The statement could also reiterate the need for appropriate notification and consultation.</p>	<p>Historic England feel that WODC should assert its right to offer discretionary CIL relief in exceptional circumstances, for example where development affects heritage assets.</p> <p>The Council should be aware of the implications of any CIL rate on the viability and effective</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>The Council should be aware of the implications of any CIL rate on the viability and effective conservation of the historic environment and heritage assets in development proposals. For example, there could be circumstances where the viability of a scheme designed to respect the setting of a heritage asset in terms of its quantum of development could be threatened by the application of CIL. There could equally be issues for schemes which are designed to secure the long-term viability of the historic environment (either through re-using a heritage asset or through enabling development).</p> <p>Paragraph 196 of the National Planning Policy Framework requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In relation to CIL, this means ensuring that the conservation of heritage assets is taken into account when considering the level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment.</p> <p>We consider it essential, therefore, that the rates proposed in areas where there are groups of heritage assets at risk are not at a level that would be likely to discourage schemes being brought forward for their reuse or associated heritage-led regeneration. In such areas, there may be a case for lowering the rates charged.</p> <p>The CIL covers a wide definition of infrastructure in terms of what can be funded by the levy and is needed for supporting the development of an area. This can include:</p> <ul style="list-style-type: none"> • open space: as well as parks and gardens, this might also include wider public realm improvements, possibly linked to a National Lottery Heritage Fund scheme, and green infrastructure; 	<p>conservation of the historic environment and heritage assets in development proposals.</p> <p>The conservation of heritage assets should be taken into account when considering the level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment.</p> <p>The conservation of heritage assets must be taken into account when considering the level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment.</p> <p>The Council should consider if any heritage-related projects in the district would be</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<ul style="list-style-type: none"> • ‘In kind’ payments, including land transfers; this could include the transfer of an ‘at risk’ building; • Repairs and improvements to and the maintenance of heritage assets where they are an infrastructure item as defined by the Planning Act 2008, such as cultural or recreational facilities. <p>The Localism Act 2011 also allows CIL to be used for maintenance and ongoing costs, which may be relevant for a range of heritage assets, for example, transport infrastructure such as historic bridges or green and social infrastructure such as parks and gardens.</p> <p>Historic buildings may offer opportunities for business or employment use – infrastructure to support economic development. Investment in heritage assets and the wider historic character of an area may stimulate and support the tourism offer and attractiveness of a place to retain and attract economic development. For example, this may entail work on listed buildings at risk. Conversely, vacant or underused heritage assets not only fail to make a full contribution to the economy of the area, but they also give rise to negative perceptions about an area and discourage inward investment.</p> <p>We therefore suggest that the Council consider if any heritage-related projects in the district would be appropriate for CIL funding. The Local Plan’s evidence base may demonstrate the specific opportunities for CIL to help deliver growth and in so doing meet the Plan’s objectives for the historic environment.</p>	<p>appropriate for CIL funding.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
Anne Ogilvie	Chadlington Parish Council	Chadlington Parish Council support the introduction of CIL.	Chadlington Parish Council are supportive of CIL proposals.
Tim Isherwood	None	Can this money be used to fix roads, potholes etc? Why can't it be used for affordable housing?	<p>Questions asked by the respondent:</p> <p>Can this money be used to fix roads, potholes etc?</p> <p>Why can't it be used for affordable housing?</p>
Perryn Bruce	None	The CIL cannot possibly be valid unless it takes into account all domestic properties, including short term and holiday let's that place a burden on the community. Can you confirm that all domestic properties will be counted please.	CIL should take into account all domestic properties, including short term and holiday lets.
Stuart Brown	None	I support the principle but leave the exact details of the schedule to those with more expertise.	The respondent is supportive of CIL.

Respondent Name	Organisation	Representation in full	Summary of representation
Joanne Alley	None	There should be more wheelchair and pram/pushchair friendly paved pathways away from roads. Milton Keynes 'redways' are a good example.	The respondent makes a comment on what CIL funds could be spend on.
Alan Paul Davison	None	<p>The report is clear and easily understandable. The rates seem appropriate for an area such as West Oxfordshire, but there is lack of clarity in the schedule about how the funding raised would be spent. The allocation to Parish/Town Councils looks appropriate, but there is no assurance that the remaining 75% of the CIL fund would be spent close to the development. Section 106 funds seem to be targeted at providing infrastructure needed to support development, while the CIL should be used to support broader community needs near the proposed development ie provisions of funding for additional car parking, school transport, and general community facilities which the new residents will want to enjoy but which will come under increasing pressure due to a significant increase in local population caused by the new development. A specific statement restricting use of the CIL funds to within a set proximity from the development, or within the specific community where the development is proposed would be helpful and reassure existing residents that they will benefit from the new developments rather than the funds being used by WODC in another location - no matter how significant the need maybe elsewhere.</p>	<p>The respondent is generally supportive of CIL as it is clear and easy to understand.</p> <p>They feel that the rates seem appropriate but that more clarity is needed about how the 75% of funding not allocated to the Parish Council would be spent.</p> <p>They feel that CIL should be used to support broader community needs near the proposed development due to pressure created by a significant increase in the population caused by new development.</p> <p>There should be a specific statement restricting the</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			use of CIL funds to within a set proximity of the development to reassure residents that they will benefit from new development.
Peter Smith	None	I believe that a CIL should be levied on all new developments as a way to pay for more infrastructure and facilities	The respondent is supportive of CIL but believes it should be levied on all new development.
Nigel Robert Gunn	None	Will the scheme have absolutely legal "teeth"? How will the developers' delivery of any money or material or agreed infrastructure be monitored?	<p>Questions:</p> <p>Will the scheme have absolutely legal "teeth"?</p> <p>How will the developers' delivery of any money, material or agreed infrastructure be monitored?</p>
Colin Martyn Green	None	We pay so much in tax already that it is wrong to expect us to pay more	The respondent is not supportive of CIL as they feel enough tax is already paid.

Respondent Name	Organisation	Representation in full	Summary of representation
Joseph wallcraft	None	Very much needed a change	The respondent is supportive of CIL.
Tom Hilton	None	Fully agree that this levy should be applied.	The respondent is supportive of CIL.
Gordon George Graylish	None	I absolutely reject this proposal. First, it seems to be a backdoor effort to raise tax on Oxfordshire residents for minor building activity. Secondly, there is an implication that we should trust Oxford county council to allocate any revenues fairly (not supported by past behaviour) as we move the benefit of tax away from local communities to an unaccountable county famed for its pet projects.	The respondent is opposed to CIL proposals. They feel that it is an additional tax on residents for minor building activities. They also feel that money may not be allocated fairly as it is not locally spent.
Martin Ackland	None	If the charge is really spent on improving the local infrastructure it would be a positively good move. So much new housing has occurred in Oxfordshire without any improvement to the roads, water supply, sewage treatment and leisure facilities that the current provisions are failing.	The respondent is supportive of CIL as long as it is spent on local infrastructure.
Derek Alan Thomason	None	Good idea. However it needs to be set at a level commensurate not only with the provision of new support infrastructure including doctors surgeries, dentists, schools, water treatment, retail facilities, etc (even if these are not part of the proposed development but whose residents will use such facilities)	The respondent is supportive of CIL as long as it supports both new infrastructure and

Respondent Name	Organisation	Representation in full	Summary of representation
		but also damage to and restitution of existing infrastructure as a result of the development.	improvements to existing infrastructure.
Craig Strachan	None	No comment made	No comment made
Rosemary Applegate	None	No comment made	No comment made
Nicholas Broadbent	None	It is unclear whether a developer would pay this in addition to other fees. This should be applied to all development and developers. It should not be an excuse to avoid normal planning consents. For example, if the sewage treatment works are already full and cannot handle additional capacity without turning our rivers into sewers then planning permission should be refused even if an additional CIL payment would pay for increased infrastructure. The infrastructure needs to be in place first not after a development.	<p>The respondent is supportive of CIL proposals but it should be applied to all development and not be used as an excuse to avoid normal planning consents.</p> <p>They feel that infrastructure should be in place before the development is built.</p>
Harry Watts	None	This charge on developers is an important contribution towards each and every community that sees development. The funds should be used for the same area	The respondent is supportive of CIL but feels

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>as the development. Previous practise by the funds holders is to hold on to those funds and possibly misuse them? So transparent use of these funds should always be declared! An important principle to remember is to use the funds for the original stated requirement, quickly and transparently. THIS NEXT IS NOT CIL, BUT I REMEMBER WHEN WODC SOLD OFF ALL THE RENTED SOCIAL HOUSING =LSVT, then the £50million or so was RING-FENCED rather than building new Social Housing, and leaving us with still 3,000 people on the Housing Waiting List? What Happened to that money?</p>	<p>that funds should be used for the same area as the development. Funds should be spent quickly, in a transparent way.</p>
Katherine Jang	Chipping Norton Town Council	<p>In principle, Councillors are supportive of the CIL in conjunction with S106 funding, recognizing that each serves different but complementary purposes in funding local infrastructure.</p> <p>However, the following points are raised for clarification and consideration:</p> <p>Definition of "Commencement"</p> <p>In paragraph 5.1, it states, "CIL payments must be made within 60 days of the commencement of any chargeable development." Councillors would like clarification on the definition of "commencement," as it appears ambiguous. The Town Council is particularly concerned given the experience with the Old Hospital site, where the development has lingered in an unfinished and deteriorating state for years. Councillors believe that clearer wording or criteria for "commencement" could help encourage developers to begin work more promptly, especially if payments are required at an earlier stage.</p> <p>Definition of Terms in Section 3.5</p> <p>Councillors seek clarification on the definition of "Large format stores" and "all</p>	<p>Chipping Norton Town Council are generally supportive of CIL, in conjunction with S106 funding but raise the following points:</p> <p>Councillors would like clarification on the definition of "commencement," as it appears ambiguous.</p> <p>Councillors seek clarification on the definition of "Large format stores" and "all other non-residential development."</p> <p>The Town Council</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>other non-residential development.” There is concern that certain lucrative businesses, such as veterinary practices, may be nil rated under the current definitions despite being quite profitable. The Town Council suggests reviewing these categories to ensure fairness and consistency in the application of the charges.</p> <p>Allocation and Transparency of CIL Funding Chipping Norton Town Council would appreciate further detail on how the 75% of CIL funds, which is not allocated to the Town Council, will be spent. Additionally, Councillors request more transparency regarding how CIL funding is being allocated and suggest that regular reports be provided to the Town Council.</p> <p>Section 6.4 Discrepancies The Town Council notes that the figures provided in Section 6.4 do not add up to 100%. Could you please review and correct this section to ensure clarity and accuracy? Chipping Norton Town Council appreciates your attention to these matters and looks forward to your response. It is important that the CIL charging schedule is implemented fairly and transparently to ensure it delivers the maximum benefit to our community.</p>	<p>suggests reviewing these categories to ensure fairness and consistency in the application of the charges.</p> <p>Councillors request more transparency regarding how CIL funding is being allocated and suggest that regular reports be provided to the Town Council.</p> <p>The figures provided in Section 6.4 do not add up to 100%. This needs to be reviewed.</p>
Rosalind Kent	None	I agree with all parts.	The respondent is supportive of CIL.

Respondent Name	Organisation	Representation in full	Summary of representation
Ann Ellis	None	What is a draft charging schedule? Your submission process is hopeless - High Street lacks interest, i.e. shops too mundane and no greenery.	The respondent would like more information about CIL proposals.
Mary Ayres	None	It's imperative that 106 is implemented to optimum effect in view of the hundreds of houses being built before the necessary infrastructure is in place. In Woodstock the GPs are already coping with 1/3 more patients than their quota, schools are full, and roads are inadequate for any extra traffic. What is more, safe pedestrian access to schools, surgeries and shops must be provided, especially as there is currently pressure to cut down car usage.	The respondent is supportive of CIL in order to improve infrastructure such as GP surgeries, schools and safe pedestrian access.
Andy Clements	None	I am generally happy with the proposal to introduce a CIL in West Oxfordshire so long as it runs alongside and in addition to the existing S106 procedures. I am content with the suggested Charging Schedule.	The respondent is supportive of CIL if it runs alongside, and in addition to, S106 procedures.
Jane Turner	None	No comment made	No comment made
Stephen Cooper	None	I am interested to hear of specific CIL charges for the quoted North Witney development.	The respondent would like to know specific CIL charges for the North Witney allocation.

Respondent Name	Organisation	Representation in full	Summary of representation
Martin Charles Cobden	None	I AGREE WITH THE EXCEPTIONS LIST THE HIGH COST WILL DISCOURAGE DEVELOPMENT	The respondent agrees with the exemption list and believes that the charges will discourage development.
Martin Leslie Crow	None	<p>Agree in principle with the proposal and rates proposed. Disagree that Structural Development should be exempt for two reasons –</p> <ol style="list-style-type: none"> 1. North Witney proposals show that developers will not always voluntarily offer to include essential infrastructure (eg off site highways and flood prevention works) and it seems questionable whether this money can be effectively S106 funded. 2. The Section 106 funding does not allow for funds to be given support the wider Parish Council to cope with pressures from new development (eg Hailey in respect of North Witney) 	<p>The respondent is supportive of CIL but believes that strategic sites should not be exempt.</p> <p>They also feel that S106 payments do not provide funds to support Parish Councils.</p>
Catriona Bass	None	Please include biodiversity and conservation purposes in CIL	The respondent requests that biodiversity and conservation purposes are included in CIL.
Garry Henwood	None	<p>It seems sensible that future developments should contribute towards the infrastructure, West Oxfordshire is growing fast and certainly at the time of writing this flooding infrastructure is certainly need.</p> <p>Sports facilities need funding and increasing and funds raised should be ring</p>	The respondent is supportive of CIL in that future developments should contribute towards infrastructure. They believe that specific

Respondent Name	Organisation	Representation in full	Summary of representation
		fenced and used for specific projects that are relevant to the charge and not lost elsewhere.	projects should be ringfenced to receive funds and not lost elsewhere.
Ian Smith	None	Agree and support the charging schedule. Our infrastructure is in a critical state of decline and needs urgent and consistent capital funding to restore a realistic and acceptable asset life and renewal programme.	The respondent supports CIL as infrastructure is in decline and urgently needs consistent funding to restore it.
Hugh Roberts	None	Concerns about effective use of CIL. Most notably the Eynsham P&R which has been built but cannot be used.	The respondent is concerned about the effective use of CIL.
Sarah Drew	None	<p>The district is in desperate need of infrastructure upgrades, especially schools and doctors surgeries. Large developers seem to have clever ways of by-passing S106s and these funds received don't seem to be used to benefit district-wide. A levy on all new large development that improves infrastructure ACROSS the district can only be a good thing.</p> <p>However, it is important to ensure that the benefit is District wide and not just in the main towns.</p> <p>It is also important to ensure that householders wanting to carry out small home extensions do not have to pay but also do not have to complete ridiculous forms to show they don't need to pay!</p> <p>The charging schedule seems to be sensible.</p>	<p>The respondent is supportive of CIL proposals to fund desperately needed upgrades to infrastructure.</p> <p>Funding for infrastructure should be spread across the district, and not just in the main towns.</p> <p>Householders wanting to carry out small home extensions should be</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			exempt without having to complete complicated forms.
Johnny Morris	None	What a waste of time.	The respondent is not supportive of CIL.
Vicki Bayley	None	Necessary to provide infrastructure	The respondent is supportive of CIL to support infrastructure.
Lysette Nicholls	South Leigh and High Cogges Parish Council	<p>Whilst we welcome the consultation on CIL the timing appears to be premature as the National Policy Planning Framework looks set to change with planning laws looking to encourage development. We don't know if CIL will remain and if it does whether the Parish will benefit as larger developments will be encouraged and the criteria for getting CIL may become irrelevant.</p> <p>Exemptions and Reductions</p> <p>The consultation (para 3) points out that the charging schedule must be carefully balanced so as not to hinder/dissuade new development.</p> <p>If a development directly generates a need for new or improved critical supporting infrastructure - then this must be paid for - by the developer.</p> <p>Surely it would make sense to have a basic principle that development should not be permitted if there is insufficient infrastructure to accommodate it. Notwithstanding this, and despite the funding gap, there are a number of</p>	<p>The respondent is generally supportive of CIL, however they feel it is premature at this stage as there may be significant changes to the NPPF.</p> <p>The respondent suggests that development should not be permitted if there is insufficient infrastructure to accommodate it.</p> <p>They believe that strategic sites should not be exempt as they would create the greatest impact on</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>inexplicable exemptions and reductions that let developers even further off the hook, for example:</p> <p>Strategic Sites Most notably, and wholly inexplicably, strategic sites - those that will create the greatest impact upon supporting infrastructure (including 2220 new homes at Salt Cross and another 1000 at West Eynsham) and the greatest profits for developers - are exempt from CIL altogether.</p> <p>The reason given (para 3.3) is that the developer will already be making 'significant Section 106 contributions' (although the figures above raised by WODC tend to illustrate otherwise) and have other 'significant development costs'</p> <p>Self Build and Flats are exempt.</p> <p>Brownfield Sites</p> <p>The proposed rate for brownfield sites is lower than that for greenfield. This is to mitigate the alleged additional costs that accrue to developers in developing brownfield sites. Again, the metric should rather be the impact that the development will have upon supporting infrastructure.</p> <p>Discretionary Relief</p> <p>There are some types of development where legislation allows a LPA to offer discretionary CIL relief. However, WODC do not currently intend to offer any discretionary relief.</p>	<p>supporting infrastructure and the greatest profits for developers.</p> <p>They also suggest that brownfield sites should be assessed for the impact that they have on supporting infrastructure rather than viability.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
Annie Margaret Lynch	None	<p>This seems an long overdue initiative. Developers are making huge profits and some of that, over and above the 106 money, should be levied to ensure that the developments put in place are an enhancement to the environment. Currently, any efforts to mitigate against environment damage (biodiversity, the inclusion of green spaces and native trees with any hope of survival, is truly pitiful). There is so much that could be done to encourage wildlife and increased wellbeing for residents. Much has been written on the subject so I will not rehearse it again here. There are examples of creative and sustainable developments, sadly few seem to be in Oxfordshire .</p>	<p>The respondent is supportive of CIL proposals which is overdue. She and believes that CIL payments should be levied to ensure that developments are an enhancement to the environment and create sustainable developments with increased well being for residents.</p>
Emma Cunnington	Sport England	<p>Sport England is the Government agency responsible for delivering the Government’s sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in planning for sport and physical activity facilities. Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim Sport England’s planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for</p>	<p>Sport England have reviewed the CIL Draft Charging Schedule and are satisfied that all other non-residential development will not have any CIL charges applied. This will ensure that facilities for sport and those that encourage physical activity in the area are not required to pay a levy. Sport England therefore support the Draft Charging Schedule.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>participation now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England’s role and objectives within the planning system can be found at https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport.</p> <p>Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government’s national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti-social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.</p> <p>The following comments are provided within the context of:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework (Department for Levelling Up, Housing and Communities, 2023). • Sport England’s Planning for Sport webpages (2023). <p>Local Plan & Evidence Base.</p> <p>The National Planning Policy Framework (2023) states:</p> <p>102. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits or nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to</p>	

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p> <p>Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.</p> <p>Sport England noted that West Oxfordshire District Council produced an updated Playing Pitch Strategy and Built Facilities Strategy in 2022 and would recommend that an annual meeting takes place with the steering group to ensure that up to date information is provided to use as evidence for the protection and enhancement of sport and physical activity provision in the district.</p> <p>Sport England's Position</p> <p>Sport England have reviewed the CIL Draft Charging Schedule and are satisfied that on page 7 it notes that all other non-residential development will not have any CIL charges applied. This will ensure that facilities for sport and those that encourage physical activity in the area are not required to pay a levy. Sport England therefore support the Draft Charging Schedule as it has been delivered.</p>	
Anne Ogilvie	Leafield Parish Council	<p>The Council considered the consultation at the Council meeting on 13th August 2024.</p> <p>The Council requests that a larger amount of CIL be passed on to Parish</p>	<p>The Parish Council are supportive of CIL but request that a larger amount be passed on to</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		Councils from larger developments which would have a greater impact on the community.	the Parish Councils from larger development which have a greater impact on the community.
Vanessa Oliveri	Milton Under Wychwood Parish Council	<p>Milton-under-Wychwood (MuW) Parish Council (which has a made Neighbourhood Plan) decided on 18/09/2024 that there is the need for WODC to:</p> <ol style="list-style-type: none"> 1. clarify what infrastructure requirements and types WODC has in mind when setting the levy, especially in relation to MuW; 2. clarify what level of development (i.e. threshold for number of homes and/or aggregate developed surface area) in each respective category (greenfield; brownfield; houses/flats/also 'large format') would require CIL levy in our parish; 3. Explain whether the current basis of setting the S106 levy and applying it for new residential (and other) development will remain the same as at present and, if not, what is the proposed formula for its determination and for its application. 	<p>Milton Under Wychwood Parish Council seek clarification on the following points:</p> <p>What infrastructure requirements and types WODC has in mind when setting the levy.</p> <p>Clarify what level of development in each respective category would need to pay CIL in our parish;</p> <p>Explain whether the current basis of setting the S106 levy will remain the same as at present and, if not, what is the proposed formula for its determination would be.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
Roger File	Blenheim Palace	<p>Due to the length of this representation, this is summarised only. The full representation can be accessed on the Council's consultation platform at:</p> <p>https://yourvoice.westoxon.gov.uk/en-GB/projects/cil-dcs</p>	<p>Blenheim are supportive of a simplified planning gain system that provides certainty however, as proposed, they do not support the CIL levy.</p> <p>They feel that it will add more bureaucracy, negotiations and delays and will increase the costs of development.</p> <p>They feel that WODC should first bring forward its strategic, allocated sites and focus on these being developed along with allocating new sites.</p> <p>They feel that S106 payments should be given more rigor before adding a new tax on top.</p> <p>They feel that CIL should not be implemented before</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			<p>it is known what it is needed to fund.</p> <p>They object in principle to 5% of CIL receipts being spent on administering the CIL system.</p>
Karen Howe	Bladon Parish Council	<p>Due to the length of this representation, this is summarised only. The full representation can be accessed on the Council's consultation platform at:</p> <p>https://yourvoice.westoxon.gov.uk/en-GB/projects/cil-dcs</p>	<p>Due to the way that CIL operates, there is a risk that the services that need to be improved to mitigate the increase in population will not receive adequate funding.</p> <p>This due to various reasons such as:</p> <ul style="list-style-type: none"> • CIL is unlikely to generate as much funding as the current S106 process. • Up to 5% of any CIL received is not available for infrastructure as it can be taken for administration.

Respondent Name	Organisation	Representation in full	Summary of representation
			<ul style="list-style-type: none"> • Unlike S106, CIL spending does not need to be directly related to the development and there are no restrictions on what it is spent on as long as it supports the development of the area. • WODC will be responsible for deciding which projects will receive CIL funds and may decide not to support funding requests from other bodies. • There are many service areas identified in the WODC Infrastructure Delivery Plan (IDP) that have never been requested under the S106 process but can now access CIL which means there will be more competition for funding. <p>Towns/parishes will have to accept developments</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			knowing that the town/parish may not receive any mitigation for the impact these developments will have on their facilities.
David Wilson	Thames Water	<p>As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water supply and sewerage undertaker for the area and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments:</p> <p>Thames Water provide essential water and wastewater infrastructure in order to support growth and deliver environmental improvements. That infrastructure provision can incorporate the provision of buildings such as a new sewage pumping station or a new sewage treatment building for example. The nature of such infrastructure buildings means that there is no impact on other forms of infrastructure requirements such as schools, open space and libraries. Thames Water therefore consider that water and wastewater infrastructure buildings should be exempt from payment of the Community Infrastructure Levy and this appears to be the case in the draft schedule at paragraph 3.5 where “All other non residential development” has a Nil charge which is supported by Thames Water.</p>	Thames Water agree with the exemption of CIL rates for all other non-residential development, outlined in paragraph 3.5.
Tim Burden	Turley	Due to the length of this representation, this is summarised only. The full representation can be accessed on the Council’s consultation platform at:	North Witney Strategic Development Area very much support the decision

Respondent Name	Organisation	Representation in full	Summary of representation
		https://yourvoice.westoxon.gov.uk/en-GB/projects/cil-dcs	to zero list the North Witney Strategic Development Area for CIL.
David C Bevan	Standlake Parish Council	<p>SUMMARY OF KEY POINTS</p> <ul style="list-style-type: none"> • Exemptions and Reductions: The parish council supports charitable exemptions and social housing but objects to self-build housing exemptions due to their impact on local infrastructure. • Brownfield Sites: A lower CIL rate should be applied to brownfield sites to reflect their higher development costs and encourage their use over greenfield sites. • First homes: It is not clear how first homes can be identified as exempt when the planning application is approved. This can only become clear when the properties are built and sold. • Strategic Sites: There are no strategic sites within the parish of Standlake, but the council notes the intention to secure a significant contribution to providing the necessary infrastructure through S106 and other mechanisms. • Parish Council's Share: Parish councils should receive at least 20% of CIL if affected by new development, with funds allocated to various community projects such as traffic calming measures, allotments, recreational and sports facilities, public toilets, and climate change initiatives. • Residential Sites: The parish council objects to the intention to cap their share of the CIL charge at £100 for all residential units. There should be no cap. 	<p>The respondent raised a number of key points as listed below:</p> <ul style="list-style-type: none"> • Exemptions and reductions: The Parish Council supports charitable exemptions and social housing but objects to self-build housing exemptions due to their impact on local infrastructure. • Brownfields sites: A lower CIL rate should be applied to brownfield sites to reflect their higher development costs and encourage their use over greenfield sites. • First homes: It is not clear how first homes can be identified as exempt when the planning application is approved.

Respondent Name	Organisation	Representation in full	Summary of representation
			<p>This can only become clear when the properties are built and sold.</p> <ul style="list-style-type: none"> • Strategic sites: There are no strategic sites within the parish of Standlake, but the council notes the intention to secure a significant contribution to providing the necessary infrastructure through S106 and other mechanisms. • Parish Council's share: Parish Councils should receive at least 20% of CIL if affected by new development, with funds allocated to various community projects. • Residential sites: The parish Council objects to the intention to cap their share of the CIL charge at £100 for all residential

Respondent Name	Organisation	Representation in full	Summary of representation
			units. There should be no cap.
Chris Hoad	Alvescot Parish Council	<p>Paragraph 3.6 Will retail developments on strategic sites be charged or exempt?</p> <p>Paragraph 4.1 It is unclear whether mandatory relief is limited to the cases listed in paragraph 2.7.</p> <p>Paragraph 4.2. It is disappointing that WODC is not proposing to offer relief to certain types of small residential development such as those listed in paragraph 2.8. With a threshold of 100 sqm, there is a danger of disincentivising the building of small affordable homes, social housing or sheltered accommodation, for example.</p>	<p>The respondent raised some questions and considerations:</p> <p>Paragraph 3.6 Will retail developments on strategic sites be charged or exempt?</p> <p>Paragraph 4.1 It is unclear whether mandatory relief is limited to the cases listed in paragraph 2.7.</p> <p>Paragraph 4.2. WODC should offer relief to certain types of small residential development such as those listed in paragraph 2.8. With a threshold of 100 sqm, there is a danger of disincentivising the building of small affordable homes, social housing or sheltered accommodation.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
Jenny Hutchings	Victoria Land	<p>Due to the length of this representation, this is summarised only. The full representation can be accessed on the Council's consultation platform at:</p> <p>https://yourvoice.westoxon.gov.uk/en-GB/projects/cil-dcs</p>	<p>The respondent objects to the rise in CIL from the previous 2020 proposal, which has now risen significantly to a single rate of £225/sqm, with little justification for the large increase in rates. They feel that the current approach is flawed and important factors have not been considered.</p> <p>They suggest that building costs and planning application fees have risen significantly since then and that house prices have fallen.</p>
Graham Maynard	None	<p>In general, I have no problem with this proposal but I think that there should be a lower rate for private housing builds and extensions to private housing because we are trying to make housing affordable to all sorts of people.</p>	<p>The respondent is generally supportive of CIL but believes that private house builds and extensions should have a lower rate to make housing affordable.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
Lauren Cook	Hallam Land	<p>Due to the length of this representation, this is summarised only. The full representation can be accessed on the Council's consultation platform at:</p> <p>https://yourvoice.westoxon.gov.uk/en-GB/projects/cil-dcs</p>	<p>A more realistic set of assumptions/inputs need to be adopted, particularly in relation to S106 costs, in order to ensure the assumptions underpinning the adopted CIL rates do not risk jeopardising the delivery of the plan, including the provision of a policy compliant level of affordable housing.</p>
Karen Howe	Woodstock Parish Council	<p>Due to the length of this representation, this is summarised only. The full representation can be accessed on the Council's consultation platform at:</p> <p>https://yourvoice.westoxon.gov.uk/en-GB/projects/cil-dcs</p>	<p>There is no guarantee that funds received from developments in the area will be used to mitigate the impact that they create on the local services and infrastructure.</p> <p>As Woodstock does not have a Neighbour Plan in place, the Town Council would receive the minimum amount.</p> <p>The Town Council believes that CIL will not generate</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			<p>as much revenue as is possible under the current S106 process and also that any revenue received will have more competition for spending as it is now available to other public bodies and services.</p> <p>Smaller developments (those under 10 dwellings) which rarely pay for infrastructure via a S106, will be charged considerably more CIL than larger schemes which pay S106 contributions.</p> <p>There is a risk that this increased cost will have to be passed on to the purchases the property which will increase house prices in an already expensive area and may stop these coming forward.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
Roger Smith	Savills on behalf of Lioncourt Strategic Land	<p>The proposed rate for greenfield sites is £225 per square metre for housing, although strategic sites are proposed to be zero rated.</p> <p>This compares with adjoining local planning authorities such as Cherwell for which the draft CIL figures are £20 in the northern area, £120 in the southern area and zero in Bicester and Banbury, together with Vale of White Horse (£280 in the Eastern Parishes, £100 in Wantage, Grove and Faringdon and £200 in the rest of the District.</p> <p>In summary, the proposed CIL rate for greenfield sites in West Oxfordshire appears generally higher than some adjoining authorities in Oxfordshire.</p> <p>This may affect the financial viability of future housing sites in West Oxfordshire which could adversely affect provision of planning benefits such as Section 106 financial contributions e.g. education and transport and the percentage of affordable housing that can be provided.</p>	<p>The proposed CIL rate for greenfield sites in West Oxfordshire appears generally higher than some adjoining authorities in Oxfordshire. This may affect the financial viability of future housing sites in West Oxfordshire which could adversely affect provision of planning benefits such as Section 106 financial contributions and the percentage of affordable housing that can be provided.</p>
Ivan Hall	None	<p>I consider this proposal will add value across WODC and support it.</p> <p>I note, however, at 6.5 that 'Parish (and Town) Councils must prepare a report for any financial year in which it receives any CIL payments'. This seems pretty woolly. I propose that a further sentence should be added to say something like... This report must be submitted to a Parish/Town Council meeting and its content must include what CIL payments have been received for what and how much, how these have been used or are intending to be used and the local benefits that are anticipated.</p>	<p>The respondent is generally supportive of CIL proposals</p> <p>It is suggested that reports relating to the financial year in which a Parish/Town Council receives CIL payments should show what payments have been received, how they have been used/are intending to</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			be used and the local benefits which are anticipated.
Mr Nicholas Perrins	Oxfordshire County Council (OCC)	<p>Oxfordshire County Council (OCC) supports Councils obtaining CIL to fund infrastructure. For Local Plan sites, we support the zero rating of the adopted strategic Local Plan sites (Salt Cross Garden Village, West Eynsham, North Witney, East Witney and East Chipping Norton), given that we expect that CIL, on top of contributions through S106 and S278, might make developments unviable. Whilst it is disappointing that there will be no CIL funding from these sites, it is our experience that the S106 and S278 requirements are such that CIL as well is not appropriate. The proposed rates for residential development (previously developed land) are £125, which is considerably less than that in South Oxfordshire</p> <p>(https://www.southoxon.gov.uk/wpcontent/uploads/sites/2/2023/12/South-Annual-CIL-Rate-summary-December-2024.pdf) and less than Oxford (https://www.oxford.gov.uk/downloads/file/1553/cil-partial-review-draftcharging-schedule). We would like to see higher rates for previously developed land, in line with the City and other districts, to support more infrastructure funding than will be achieved with the rates as proposed. We note that the viability report makes frequent reference to the use of S106 alongside CIL, and we would want any documentation to be clear that S106 will continue to be the main route for funding all relevant OCC infrastructure, with scope for CIL to be used in addition, sometimes to bridge funding gaps. OCC would like to engage with West Oxfordshire District Council to agree how a proportion of CIL will be spent on infrastructure that the County Council is responsible for. CIL spending strategies exist in South Oxfordshire and Vale of White Horse District which allocate a defined percentage of CIL funding to the County Council for projects approved by the Districts each year and the County Council uses those strategies to make informed applications for funds.</p>	<p>OCC support the zero rating of the adopted strategic Local Plan sites.</p> <p>OCC would like to see higher rates for previously developed land, in line with the City and other districts, to support more infrastructure funding than will be achieved with the rates as proposed.</p> <p>It should be made clear that S106 will continue to be the main route for funding all relevant OCC infrastructure, with scope for CIL to be used in addition, sometimes to bridge funding gaps.</p> <p>OCC would like to engage with West Oxfordshire District Council to agree how a proportion of CIL</p>

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		<p>CIL funding could help bring forward numerous transport projects that would support development in line with the LTCP which are currently unfunded or have a funding gap. The projects could range from works on the highways to works around railway stations and public rights of way. There is a particular need to fund rural transport improvements and CIL should be considered for measures in villages and providing connections between settlements. More widely, even a small amount of funding will help to improve gaps in the cycle network and create mini mobility hubs in accordance with strategies and plans such as Local Cycle and Walking Investment Plans (LCWIPs) and our Mobility Hub Strategy. The County Council would also like consideration to be given to using CIL funding towards major mobility hubs as these benefit a wide area. CIL funding could also be used for public transport infrastructure where gaps are identified, as well as bus service provision where there have been insufficient contributions received through S106 to enable a service in the early stages of a development and influence travel behaviour from the outset. Community bus services should also be considered for CIL funding as these are often a lifeline for rural areas and are difficult to secure funding towards. Improvements to the household waste recycling facility network also could be funded using CIL, as well as depot space for Supported Transport and Fleet services. Healthy place shaping schemes that benefit public health should be eligible for CIL funding. CIL funding could be used to plug funding gaps in any of the projects listed in the Infrastructure Development Plan (IDP) that accompanies the Local Plan. However, the IDP and those projects referred to above should not be considered a definitive list as further infrastructure needs may become apparent over time.</p>	<p>between the District and County.</p> <p>CIL funding could help bring forward numerous transport projects that would support development in line with the LTCP which are currently unfunded or have a funding gap.</p> <p>Funding could also help improve the household waste recycling facility network. Healthy place shaping schemes should also be eligible for CIL funding.</p> <p>The Council's IDP should not be considered a definitive list as further infrastructure needs as more may become apparent over time.</p>
Matthew Chadwick	JPPC Chartered Town Planners	<p>We would suggest that the proposed instalments for development with a CIL liability of less than £100,000 be delayed until at least 180 days of commencement. Cash flow is often a significant issue for small and medium</p>	<p>The proposed instalments for development with a CIL liability of less than</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>sized builders. - Commencement of development may involve only a minor amount of work and that may be to demolish existing buildings and carry out further works on investigation for contamination or archaeology which are significantly costly actions with no prospect of returns possible. - Having experience of working with CIL in other Districts we are aware that it can be an administrative burden to applicants and the Council. Whilst exemptions are available from CIL for self build dwellings and residential extensions and annexes this often results in significant amounts of paperwork for little or no benefit to the Council. We would suggest that all new self build dwellings (this could be controlled through a condition) and all residential extension/annexes and outbuildings serving existing dwellings have a nil charge rate applied to them. This would provide them with nil CIL liability and would mean that 'exemptions' will not need to be processed. It will reduce the burden on both the Council and applicants. - We would request the dwellings with the occupancy controlled through conditions are legal agreement (for example farm workers dwellings, holiday let accommodation) be set at a nil rate for CIL. These properties do not have the same resale price as conventional dwellings and this could impact on their delivery. - We consider it would be advantageous to provide a nil rate charge for primary retail, convenience based supermarkets and superstores, and retail warehouses in the defined town centre areas to help make these areas more attractive to regenerate the town centres. It is unclear how the Council will differentiate between primary retail and convenience based supermarkets/retail warehousing. - A clear glossary of all terms should be provided within the charging statement to reduce areas of which could be open to interpretation. For example we note that flats have a reduced rate however it is unclear if this will apply to maisonettes. Likewise uses such as 'large format retail' need to be appropriately defined. - Elderly persons housing should also have a 'nil rate'. The occupiers of these types of accommodation do not have the same impact on infrastructure and there is a</p>	<p>£100,000 should be delayed until at least 180 days of commencement. Cash flow is often a significant issue for small and medium sized builders. Commencement of development may involve only a minor amount of work but may be costly with no prospect of returns.</p> <p>All new self build dwellings and all residential extension/annexes and outbuildings serving existing dwellings have a nil charge rate applied to them. This would mean that 'exemptions' will not need to be processed. It will reduce the burden on both the Council and applicants.</p> <p>We would request the dwellings with the occupancy controlled through conditions be set</p>

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>significant under-supply across the country, with a growing demand due to the aging population.</p>	<p>at a nil rate for CIL. These properties do not have the same resale price as conventional dwellings</p> <p>It would be advantageous to provide a nil rate charge for primary retail, convenience based supermarkets and superstores, and retail warehouses in the defined town centre areas to help make these areas more attractive to regenerate the town centres. It is unclear how the Council will differentiate between primary retail and convenience based supermarkets/retail warehousing.</p> <p>Elderly persons housing should also have a 'nil rate'. The occupiers of these types of accommodation do not have the same impact on infrastructure.</p>

Respondent Name	Organisation	Representation in full	Summary of representation
			A clear glossary of all terms should be provided within the charging statement to reduce areas of which could be open to interpretation.
Richard Wilkins – Deputy Clerk	Eynsham Parish Council	Eynsham Parish Council have no objection to the schedule being put forward.	Eynsham Parish Council has no objection to CIL.
Jane Hennell	The Canal and River Trust	The Canal and River Trust have no comment to make.	No comment.
Amartya Deb	Gloucestershire County Council	The adoption of £25/sqm nominal rate for flatted development compared to other residential developments that range between £125-£225/sqm is a noticeable difference. Currently, Cotswold District Council in Gloucestershire charges £95.85/sqm for CIL, for most residential developments (excluding some strategic sites). In comparison, the proposed CIL rates of WODC pose a slight concern of cross-boundary influence they may have on the “policy landscape” at a time when local governments are already struggling with resources. High-density living means more pressures on existing infrastructures of social care, healthcare, education, transportation, etc. For development to be sustainable, such developments should be able to support the increase in demand rising from the greater density development. It is unclear if the proposed CIL rates for flatted development link to specific areas, a specific category within flatted	The adoption of £25/sqm nominal rate for flatted development compared to other residential developments is a noticeable difference. Cotswold District Council charges £95.85/sqm for CIL for most residential developments (excluding some strategic sites). The proposed CIL rates of

Respondent Name	Organisation	Representation in full	Summary of representation
		<p>developments, or if they are district wide. However, at the onset, lowering the CIL rates for apartments, appears to be counter-intuitive against the increase in density; unless of course, there is evidence that infrastructure pressures can be mitigated through funding from other sources.</p>	<p>WODC pose a slight concern of cross-boundary influence. High-density living means more pressures on existing infrastructure. It is unclear if the proposed CIL rates for flattened development link to specific areas, a specific category within flattened developments, or if they are district wide. Lowering the CIL rates for apartments appears to be counter-intuitive against the increase in density.</p>
Derek Mackenzie	Witney Town Council	<p>Witney Town Council ask that WODC consider the following when assessing the proposed introduction of a Community Infrastructure Levy:</p> <p>That the technical calculation used for the level of CIL are not clear and easily understandable and may be manipulated by developers.</p> <p>The 2016 Infrastructure Delivery Plan is updated to include details of the financial costs to deliver projects.</p> <p>That regular review will be made of the CIL scheme in light of any changes to</p>	<p>The technical calculation used for the level of CIL are not clear and easily understandable and may be manipulated by developers.</p> <p>The 2016 Infrastructure Delivery Plan needs to be updated to include details of the financial costs to deliver projects.</p>

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		<p>planning policy or updates to key schemes such as the Local Plan 2041.</p> <p>That policy concerning Section 106 contributions is enhanced to ensure infrastructure is delivered in the areas required where CIL is zero rated</p>	<p>Regular review should be made of the CIL scheme in light of any changes to planning policy or updates to key schemes such as the Local Plan 2041.</p> <p>Policy concerning Section 106 contributions is enhanced to ensure infrastructure is delivered in the areas required where CIL is zero rated</p>
Truus Dearing	None	<p>Having read fourteen pages on this subject, you have to wonder at the mentality of the people who dream up and print such complicated nonsense! How much time and money has been spent on preparing it?</p> <p>If a developer wants to build dwellings and submits a planning application, the local authority needs to assess whatever is required for this to fit in with the areas long term plans and then prepare a schedule of what is required for the developer to incorporate in his plans if he wants them accepted.</p> <p>This would include any new roads required, and depending on how many dwellings he wants any schools hospitals shops parks etc are needed for that development to fit in with the local plan.</p> <p>A levy that provides a few street ornaments or children's play areas are an insult and a total waste of time.</p> <p>Charging developers these crazy amounts must be a major reason for the</p>	<p>The respondent is not supportive of CIL proposals and suggests that each development should be assessed by the Local Authority in terms of infrastructure need.</p> <p>The respondent considers the proposed CIL levies to be too expensive for developers.</p>

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		ridiculous price of housing these days, whoever is paid to come up with these incredulous schemes.	
Chris Fryer	None	<p>It is quite clear that this levy is just another TAX. It will do nothing to attract or encourage new development in West Oxfordshire. The council have obviously recognized the jeopardy of imposing this tax on the proposed strategic local plan sites of Salt Cross, West Eynsham, North Witney, East Witney and East Chipping Norton by proposing that they be CIL exempt because of the significant infrastructure costs associated with bringing such developments forward. Imposing additional costs to the section 106 and Highway charges already imposed will surely make developers shy away from West Oxfordshire.</p> <p>In my view this is a poorly thought through proposal with little or no consideration of the long term consequences. I might add that I am not a developer nor have I any connection to any proposed development.</p>	<p>The respondent does not support CIL proposals, seeing it as an additional tax.</p> <p>They believe it to be poorly thought through with no consideration of long-term consequences.</p>
Sarah Veasey	North Leigh Parish Council	<p>In terms of my ward, villages like North Leigh are taking disproportionately large amounts of planning to their current housing numbers and yet have very little infrastructure already in place. Whilst the proposed charge is a flat percentage across all villages which would appear equitable, the reality is that in North Leigh CIL will be generating large amounts of revenue for WODC compared to other villages but they will have very little amount (especially as our Neighbourhood Plan has not yet been validated and with the £100 cap) returned to them to spend on infrastructure here to catch up with other villages in West Oxon especially compared to the Uplands zone where there are less planning applications but</p>	<p>North Leigh Parish Council feel that there have been disproportionately large amounts of housing built in North Leigh, generating large amounts of CIL payments which should be returned to the parish for</p>

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		<p>infrastructure is already in place. This is not equitable. There should be a mechanism, possibly through reference to an updated version of the Settlement Sustainability Report, or through another similar mechanism, whereby settlements such as North Leigh, with HUGE planning applications but MINIMAL infrastructure/amenities already in place, should be allocated higher returned levels of the collected CIL funds, temporarily above the 15/25% until they have caught up with the other 35 villages in WODC.</p>	<p>infrastructure improvements.</p> <p>The Parish Council feel that a mechanism should be applied whereby settlements with large amounts of development but minimal infrastructure/amenities should be allocated higher returned levels of CIL funds above the 15/25%.</p>
John Alexander		<p>I have been contacted by WODC regarding consultation and comments on the proposed CIL charge. The information that I have seen so far does not make it clear whether or not it applies to private homes whose owners may wish to extend their property for personal reasons e.g. a granny flat.</p> <p>So my question is simply “Will the CIL charge in anyway apply to development of private residential property”? I look forward to your early reply</p>	<p>Query regarding whether CIL applies to residential extensions or granny flats.</p>