

# Valley Parishes Alliance

Protecting & enhancing the communities in the Avon & Limpley Stoke Valley, East of Bath

**Bathampton    Batheaston    Bathford    Claverton    Freshford**  
**Limpley Stoke    Monkton Combe    Westwood    Winsley**

Planning Services

PO Box 5006

Bath

BA1 1JG

18 September 2014

## **B&NES Community Infrastructure Levy Consultation**

Dear Sir,

The Valley Parishes Alliance (VPA) offers the following comments with regard to the public consultation on the Community Infrastructure Levy (CIL) and the associated proposed Charging Rates in particular. The VPA is an alliance of nine Parish Councils in the Avon and Limpley Stoke Valleys to the east of Bath. In particular, the following six parishes within B&NES are members: Bathampton, Batheaston, Bathford, Claverton, Freshford, and Monkton Combe.

The introduction of CIL has the effect of imposing a tax on development in order to help fund infrastructure required by new developments. This has the consequence of increasing the costs of development since the landowner is responsible for paying the charge to the local authority. This will, of course, be passed on to the developer, and ultimately to the final purchaser or owner of the property. Within the parishes of the VPA, developments will generally comprise small residential infill, or residential extensions. We are largely unaffected by CIL categories other than 'residential', and our comments are restricted to this category.

1. We are concerned that the proposed Charging Schedule of £100/sq m will have a very significant effect on overall property prices within our parishes. For example: a new property of (say) 300 sq m of floor space, will incur an additional CIL cost of £30,000. This could easily represent an increase of 10% or more in the value of the property. Since we are all struggling to provide affordable housing in our parishes, an increase of

10% as a result of the CIL is a very significant additional cost, which will have the obvious undesirable knock-on effect in our local housing markets.

2. Since the likely developments within our parishes are of the infill types of properties, it is very hard to argue that such developments will incur any additional infrastructure at all. An additional house or small number of new residences will not require new schools to be built nor roads to be upgraded. Within the spirit of CIL, therefore, it seems to us that such small scale developments should be excluded entirely from CIL.

3. When comparing the proposed charging rates within B&NES and those of surrounding local authorities, there is a large disparity across the area. Looking always at the residential rate for rural developments, we note that in Wiltshire, a proposed rate of £55 would apply; in the outer zone of Bristol City, the approved figure is £50; and in Swindon the draft proposal is for a rate of £55. The B&NES proposed rate is double or nearly double that of our neighbours. In some cases, this difference would be apparent on opposite sides of the same street. This is manifestly unfair and will be seen as an example of 'postal code lottery' syndrome.

Our suggestion therefore, is to consider:

a) Exemption from CIL of all developments of less than 10 residences. This would largely take care of concern number 1 above. The figure of 10 has been used before to differentiate different scales of development (for example on the requirement to provide affordable housing as a percentage of the total). It would also address the practical observation in number 2 above, and would largely address number 3 above. We believe that this is the only viable option.

b) If a) above is deemed unworkable, for any reason, then the absolute rate of charges should be reduced to be no more than £50/sq m to be more compatible with our close neighbours. This would address number 3 above.

With Regards

Simon Coombe  
VPA Chairman