

CIL consultation – Sheffield Green Party response

This is the response of Sheffield Green Party to SCC's consultation on the Use of the Community Infrastructure Levy (CIL).

Summary

- **The consultation is so flawed it should be abandoned**
- **Neighbourhood funds should be spent at ward level, not centralised**
- **The councillors from each ward should be responsible for making decisions on developments in their neighbourhoods.**
- **The Council should do more to improve its efforts to tackle deprivation, poverty and inequality.**

Purpose of CIL

1. CIL is paid by property developers to the Council to contribute toward the costs of the adverse effects of their developments.
2. As building developments grow, they increase pressures on the lives of neighbouring residents, both during and after the construction phase. Residents have to put up with construction vehicles, noise and mud; parking obstructions and an increase in traffic; the loss of peaceful, green (or at least open) space; the loss of natural habitats, birds, plants and wildlife; restricted pavements and roads; increased anti-social behaviour; loss of views and light; and increases in litter and fly-tipping.
3. CIL is only charged in areas where the Council has decided developers must pay it. No CIL was charged, for instance, on Ikea or the huge Meadowhall extension. Sheffield Greens believe the council should address this without further delay. The Council should review the current boundaries of the charging zones.
4. The Council has been receiving CIL payments since 2015. 85% of all CIL receipts are controlled centrally and decided by Cabinet.
5. This consultation is only about the remaining 15%, known as the Neighbourhood Portion. To give some perspective, this is less than the sum of money (£1.3 million) spent out of the centrally-controlled CIL on upgrading the Lower Don Valley bus route from Sheffield to Rotherham.
6. Since 2015, none of the Neighbourhood Portion has been spent outside Parish Council areas because the council has so far failed to set a decision-making process.

Comments on the 15% Neighbourhood portion of CIL

7. We are disappointed the Administration has delayed this consultation for 3½ years since the council started receiving CIL contributions. Consequently, none of the Neighbourhood Portion has been used except in Parish Council areas.
8. We believe this money should be used for its intended purpose – to mitigate the impact of development on the lives of the people closest to it. This could mean improving small open spaces in the city centre, addressing traffic and parking arising from new developments or upgrading children’s play facilities in Sharrow and Highfield.
9. We note the main proposal would further centralise control of the CIL generated in each ward, before redistributing it to other wards.
10. We do not agree with the greater centralisation of decision-making that the Council proposes.
11. We disagree with the proposal to take CIL funding away from the neighbourhoods most affected by the negative impacts of development.
12. We think ward councillors should be responsible for deciding the spending of the Neighbourhood Portion of CIL receipts generated in their wards, so that the funds can be spent fairly and for the purposes for which they are intended.

Tackling Deprivation

13. We think the Council should do more to tackle deprivation than it does.
14. Some wards contain areas with a wide range of deprivation. For instance, City Ward is mid-ranking overall on the Index of Multiple Deprivation (IMD), but it includes Highfield, which contains areas of intense poverty. Nether Edge and Sharrow ward is also mid-ranking on the IMD but contains areas of acute poverty. Manor Castle ward has a high level of deprivation but also has a high level of CIL receipts.
15. We disagree with the Council’s proposals that would divert funding away from areas of deprivation.
16. If the Council is serious about tackling inequality, it should consider greater use of the IMD in spending the far larger amount of 85% of CIL that is still controlled centrally
17. The council should go further and look to see where else it can extend the use of IMD to influence its spending across all its budget areas, noting that very little of the council's spending currently matches the IMD.

Adequacy of the consultation

18. We are disappointed that most of the consultation questions are designed to lead to the answer the Administration seeks.

19. Secondly, the consultation does not properly identify the main proposal (see paragraph 9 above) in a fair and open way so that respondents can comment on it. In particular, Question 17 conflates two entirely separate propositions: (1) to take funding from the neighbourhood where the development takes place and (2) **if so**, to distribute the funds via the Index of Multiple Deprivation. The questionnaire does not contain scope for respondents to disagree with (1) but to agree with (2). This makes it unfair.
20. We therefore believe the whole process is a sham.
21. We note this is the same flawed approach as was seen in the consultation on including Chesterfield in the Sheffield City Region. That was so badly flawed it was unlawful.
22. In addition, by top-slicing a further 10% of the Neighbourhood Portion for centrally-controlled neighbourhood planning, the proposal does not comply with the legal minimum to spend at least 15% on neighbourhood community infrastructure.

Action needed

23. We believe that:
 - a. The council should disregard the answers to Questions 1 to 17 and should abandon this consultation.
 - b. Spending of the CIL funding should take place at ward level instead of the proposed central control
 - c. The councillors from each ward should be responsible for making decisions on the spending of the Neighbourhood Portion (15%) of CIL generated from developments in their wards, taking account of discussions within local ward communities about the impact of development on them.
 - d. Ward councillors' decision-making should be in line with the ward pot and with ward priorities.
 - e. The Council should thoroughly review its spending to see where it could improve its efforts to tackle deprivation, poverty and inequality.

Sheffield Green Party
13th September 2018