

## **Silsden Town Council Response to the amended charging summary**

The specific areas relating to each charging band in Silsden are not specifically defined so it is not possible to assess the effect on this community or whether it will affect the deliver ability of individual sites.

Without a specific identification of where the CIL bands are applied in Silsden and the specific site allocations are to be made we cannot comment on the applicability of the CIL charge and its effect on the development of our community.

No detail has been given of how the communities share will be transferred to the STC's control.

The rate bands proposed for Silsden do not appear to be capable of delivering more than 25% of the gap between capital needed for infrastructure projects to support the level of development identified in the core strategy.

It is not clear how the infrastructure is to be delivered or whether the total CIL generated in the community will be retained in the community or the mechanism for STC to be party to the decision process which decides on the projects to be funded or the order in which they are undertaken.

Mention is made of an instalment policy ,however, it appears that larger projects are given longer to pay whilst smaller projects have to pay more sooner, this appears perverse.

There is no mechanism to describe how "payments in kind" are shared with the community . How will the community receive its "proportionate share" of a "payment in kind" especially if it is not in the communities boundary?

It is not clear what happens if a CIL is paid and the planning permission is not developed in total. Is the CIL refundable or will the charge be scaled back to what was actually developed?

It is not clear if Communities will have a say in what infrastructure projects will be funded by CIL.

The draft says if adopted the CIL charge is mandatory, if this is the case does this mean that once planning permission is granted and development commences a developer cannot renegotiate his CIL commitments?

Without the above being answered it is not possible to decide if the charging bands are correct for this community or whether the geographic areas allocated to different bands are correct.