



**Enhancing Infrastructure Planning and Delivery for  
English Councils**

## **Governance Report**

**Borough Council of King's Lynn & West Norfolk**

**May 2025**

# 1. Summary

## Summary of support

- 1.1 As part of the Planning Advisory Service's (PAS) programme to enhance infrastructure planning and delivery in English Councils, Inner Circle Consulting provided support to the Borough of King's Lynn and West Norfolk to develop a set of practical recommendations to help you improve the governance of developer contributions.
- 1.2 The support included one workshop with officers and a meeting with the Members of your Community Infrastructure Levy (CIL) Spending Panel which enabled an assessment of your current processes and practices around infrastructure planning and delivery. The support was based on the PAS Improving the Governance of Developer Contributions Handbook and accompanying self-assessment toolkit.

## Key messages

- 1.3 From our workshop there appears to be a good level of support and consensus at a senior officer level that a new approach towards the allocation and spend of CIL is required. It was discussed that the approach needs to move away from a short-term, locally-focused approach towards one which establishes a link between CIL spend and the Local Plan. More oversight at a corporate level is also needed to both add assurance into the process and allow wider council priorities to be considered for CIL spend.
- 1.4 Some further work will be required, especially with your CIL Spending Panel, to get agreement and consensus on a new approach, and the changes required to implement it. A Cabinet decision is likely to be required to ensure implementation.
- 1.5 It is also necessary to ensure that a new approach is based on up-to-date policy and evidence, which can be achieved by progressing a new Infrastructure Delivery Plan (IDP) to ensure you have an up-to-date understanding of your infrastructure needs, and a framework or programme to prioritise these needs and agree spend.
- 1.6 Our recommendations outlined in Section 3 cover the following areas:
  - The need for a new spending strategy for CIL focussed on a number of key principles
  - That the mandate for this new strategy should be secured through a Cabinet decision
  - That your new strategy should be underpinned by strengthened governance at corporate and officer level
  - That more support for parish and town councils could enable more informed spend of CIL
  - That future updates to your IDP should move towards a more programme-led, evidence-based approach to CIL Spend.
  - And your new IDP should be digitised to make it easier to update and communicate to stakeholders.

# 2. Introduction

- 2.1 Councils play a unique and critical role in planning, funding and delivering the infrastructure that is required to ensure that the vision and growth objectives set out in local plans are sustainable and meets the needs of communities.
- 2.2 The various forms of developer contributions that exist to mitigate the impact of this development are rarely, if ever, sufficient to fund all the infrastructure that is required to support demand from development in an area. Therefore, to ensure that they are used effectively we recommend that they should be considered as part of a wider, corporate approach towards funding and delivering infrastructure.
- 2.3 This Advice Note considers your Council's current governance processes for developer contributions and provides some practical steps to help improve them based on the PAS Improving the Governance of Developer Contributions Handbook and accompanying Self-Assessment Toolkit.

## **Background**

- 2.4 In 2021 PAS published a handbook which was intended to help improve the ways that councils manage and allocate developer contributions. This is to ensure that money collected is used to deliver infrastructure in an efficient, transparent, robust and effective way. The guidance encourages councils to see infrastructure planning and delivery as a 'system', within which there are a number of interdependent parts, none of which are more important than another.
- 2.5 This system of infrastructure planning and delivery goes beyond just how developer contributions are collected and includes:
  - A consideration of the resources available to allocate them and the organisation around that.
  - the processes and systems for how developer contributions are collected, monitored and managed.
  - how decisions are made.
  - the policy and evidence which support these decisions.
  - and the resources and capabilities available to ensure projects are delivered to realise their intended outcomes.
- 2.6 Alongside the development of the handbook, PAS has provided facilitated support to individual councils to address their specific needs and challenges associated with the governance of developer contributions.
- 2.7 As part of the current PAS programme to enhance infrastructure planning and delivery in English Councils, the Borough Council of Kings Lynn & West Norfolk received facilitated support specifically focussed on the governance of developer contributions. This Advice Note is the output of that support.

## **Methodology**

- 2.8 The support was undertaken by Inner Circle Consulting on behalf of PAS. A workshop was held with officers from the Council in March 2025, including representatives from the CIL Team, Planning and Environmental Health (both policy and planning control), Strategic Housing and Community Safety, and the Portfolio Holder for Planning (who is also the Chair of the CIL Spending Panel). Following the Workshop a further meeting was held in April 2025 with Members of the CIL Spending Panel to seek further input from them.
- 2.9 The aim of the workshop was to complete the 'self-assessment toolkit' to evaluate your current processes and agree a set of recommendations for improvement based on principles

within the Improving the Governance of Developer Contributions guidance. The self-assessment covered five key areas, aligned to the guidance:

- Leadership and resources
- Governance
- Policy and Evidence
- Systems and Processes
- Project Delivery.

2.10 This was supplemented by desk-based research of key council documents including the CIL Governance Policy Document (2024), Draft CIL Spending Strategy (unpublished), the Strategic CIL Application Form, the Local CIL Application Form, and CIL Project Business Case.

### 3. Findings & Recommendations

3.1 We recognise a number of areas of good practice, including:

- That you have a number of documents and guidance which are up to date and available on your website which sets out your approach to governance, the 'rules' around CIL and your processes, including the adopted CIL Governance Document; and
- The efficiency of your processes and your track record of spend, meaning that retained or unspent CIL balances are minimised.

3.2 The key recommendations from the support are as follows:

- Develop and adopt a new Spending Strategy for CIL focused on a number of key principles
- Implement a new governance framework at corporate and officer level to ensure consistency, transparency, and to integrate different parts of the council.
- Move towards a more business-plan led approach for CIL spend
- consider providing additional support and resources for Parish and Town Councils to enable more informed spend of the Local CIL Fund and Neighbourhood portion.
- Updates to your IDP should be digitised to allow it to be a 'living document' that can be regularly updated
- Consider reviewing your CIL Charging Schedule as part of your Local Plan Review.

3.3 In supporting a new approach, we provide below some links to work from other Local Planning Authorities (LPAs). The resources are relevant in the way that the LPAs have taken an evidence-led, programme-based approach to CIL spend.

- The Greater Norwich Partnership's [Five Year Infrastructure Investment Plan](#)
- Chichester District Council's [Infrastructure Business Plan](#).
- Sevenoaks' CIL Spending Board  
[https://cds.sevenoaks.gov.uk/mgCommitteeDetails.aspx?ID=320&\)=1](https://cds.sevenoaks.gov.uk/mgCommitteeDetails.aspx?ID=320&)=1)
- Elmbridge District Council's Strategic Priority Programme  
<https://www.elmbridge.gov.uk/planning/community-infrastructure-levy-cil/cil-strategic-infrastructure-projects>
- East Suffolk's resources for Parish Councils  
<https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/parish-support/>

#### Part 1: Policy and Strategy

## Assessment

- 3.4 From the feedback we received in the workshop and from a review of other documents we consider that the current approach towards allocating CIL is not 'strategic', in that spending decisions are not made with a clear link to either the Local Plan or Corporate Plan. Instead allocations can be characterised as being ad-hoc to local projects, based largely on applications for funding from parish councils. In addition to this we heard that expenditure of the 'strategic' element of CIL does not currently happen in areas where new development has occurred.
- 3.5 To support this analysis, your (Draft) CIL Spending Strategy stated that from the adoption of CIL in 2017 through to 2024 £4.5m was allocated to 258 projects. This puts considerable pressure on the team responsible for processing applications given the administration involved in managing these allocations.
- 3.6 The current process (as set out in the CIL Governance Policy Document) favours projects which can demonstrate local support and can be delivered in the short-term (to commence in 1 year and be completed in 5), rather than demonstrating the need for the project to support new development and / or alignment with strategic priorities.

### **Recommendation 1: Develop and adopt a new Spending Strategy for CIL focussed on a number of key principles.**

- 3.7 Through our engagement with your Council at both officer and member level we recognised that there is a clear desire to adopt a more strategic, plan-led approach to the use of CIL. This requires a move away from an ad-hoc approach based on applications to being more proactive and strategic based on both evidence of the need for infrastructure as a result of planned growth, as well as to align spend with strategic priorities linked to the Local Plan and Corporate Plan.
- 3.8 In developing a more strategic approach you are currently proposing to separate CIL into 2 project types, with the aim of meeting wider borough infrastructure requirements through two 'pots', in addition to the Neighbourhood portion & CIL admin 'pot':
- a Strategic CIL Fund (80% of CIL receipts, excluding the Neighbourhood portion) for large-scale infrastructure projects selected by the Council,
  - and a Local CIL Fund (20%) to be allocated through an application process.
- 3.9 It is recommended that the principles outlined in paragraphs 3.11 to 3.26 below would mainly apply to the governance of your Strategic CIL Fund, whereas the current 'application' based process can be used to manage your Local CIL Fund.
- 3.10 Based on our findings, we propose the following key principles as a starting point for your new approach.
- 3.11 That strategic CIL should be used to unlock or support planned development as set out in the Local Plan.**
- 3.12 As outlined above, the link between the use of CIL and new development is considered to be currently weak, with CIL spend not linked to areas where new development has occurred, and allocations targeted at smaller scale, parish-led projects.

- 3.13 The Planning Act (2008) and CIL Regulations (2010) both make a clear link between the use of CIL to support the development of its area, with the accompanying CIL guidance stating that CIL should be used to “fund the infrastructure needed to deliver the relevant plan”. Now that the new Local Plan is adopted, this presents an opportunity to establish a defining principle for the use of CIL that it should be used as a way of mitigating and supporting plan-led growth.
- 3.14 It also must be considered that CIL on its own will not be able to fund all the infrastructure required to support new development. Therefore, it should be used alongside other types of funding to ensure its benefits can be maximised.
- 3.15 CIL should be used in a way which leverages other sources of funding for greater impact.**
- 3.16 Feedback from the Workshop suggested that the current system does not have sufficient mechanisms or processes to provide an opportunity to leverage in other sources of funding, particularly external funding that either the council or external partners can bring in (Towns Fund was provided as an example).
- 3.17 Therefore, another key principle of a new approach should be that the use of CIL should be considered alongside other sources of Council-controlled funding, such as Section 106 or New Homes Bonus, as well as where it can be used to leverage in external sources of funding such as that controlled by the County Council, Towns Fund, Shared Prosperity Fund, or in the future funding as part of a Devolution deal.
- 3.18 CIL funded projects can also contribute towards achieving the objectives across key corporate strategies.**
- 3.19 The workshop also fed back that as well as a weak link between CIL spend and the Local Plan, there is no strong process or governance to link the use of CIL to other Council-wide strategy or objectives. As well as the recently adopted Local Plan, there are a number of other relatively recent Council strategies which should be considered as part of a new approach to spending CIL. This includes the Corporate Strategy adopted in June 2024, the West Norfolk Economic Strategy adopted in January 2025, and the Norfolk Growth Plan.
- 3.20 Whilst the primary purpose of CIL is to support plan-led, new development, the use of CIL should also consider how the projects it is funding will contribute to and align with this wider policy context providing that they support development within the area. For example, in relation to transport and connectivity (raised as a particular issue in our workshop as well as in the Economic Strategy), specific projects such as those referenced in the Norfolk Strategic Infrastructure Delivery Plan to which the Norfolk Growth Plan is linked do not appear to be currently funded by CIL.
- 3.21 A new CIL Spending Strategy should follow a programme-led, evidence-based approach.**
- 3.22 From the workshop, it was reported that the projects applying for CIL are not based on any robust evidence of ‘need’ that relates to the Local Plan. There is a lack of long-term, strategic consideration of how CIL balances could be built up to meet longer-term infrastructure needs and instead are focused on allocating smaller sums of money to projects that can be realised in the short-term.

- 3.23 By adopting an evidence-led, programme-based approach (through an updated Infrastructure Delivery Plan (IDP), potentially accompanied by 'programme' or priority list of what projects as to what you intended to fund) as part of your CIL Strategy, it will allow you to be more proactive in your infrastructure spending decisions. It will allow the Council to engage in more informed and considered longer-term strategies around investing in infrastructure to support planned growth in line with the Local Plan, whilst aligning the allocation of CIL funding with its broader corporate objectives.
- 3.24 Taking an evidence-led approach will allow the council to identify and prioritise funding for infrastructure based on thorough analysis and evidence of what infrastructure is needed to support the delivery of the Local Plan. Adopting an evidence-led approach to CIL allocation also promotes transparency and accountability in decision-making processes.
- 3.25 Further guidance on this new approach is provided below.
- 3.26 A new approach to CIL should recognise the Importance of working with partners to deliver infrastructure.**
- 3.27 From our workshop we understand that CIL is almost exclusively allocated to parish councils, and its use is not joined up with other services inside the council or external organisations. A more strategic CIL spending strategy will require a commitment to working in partnership with stakeholders within and outside the Council who are responsible for planning, funding and delivering infrastructure.
- 3.28 Key partners will include the County Council (where they are the statutory provider for infrastructure such as education and highways), the Integrated Care Board for the delivery of primary care, National Highways, neighbouring councils, utility providers and others. The Council will need to be transparent in its new approach towards allocating CIL and engage other partners in any new formal governance arrangements.

## **Recommendation 2: Secure a mandate for your new approach through a Cabinet decision**

- 3.29 Through engagement with your Management Team and CIL Spending Panel, you should seek to agree and adopt through a Cabinet decision a set of key principles that your new approach will adhere to.
- 3.30 Securing a Cabinet decision on these key principles will secure a strong mandate to move forward and secure the support and buy-in from key officer and councillor stakeholders. From this strong foundation you can then make the necessary changes to the detail of your governance and processes.
- 3.31 This Cabinet decision could be used to demonstrate the 'business case' for a new approach, outlining not just the objectives and benefits of a new approach, but also a programme for implementation and any resources required for its successful development and delivery.

## **Part 2: Governance**

### **Assessment**

- 3.32 The key messages that came through the workshop regarding the current governance structures for CIL was that the current process for approving projects for CIL funding through the CIL Spending Panel is considered too subjective, and applications are not receiving the level of scrutiny required to ensure that CIL is being used in an optimal way. It is felt that in

some spending rounds 'weak' applications are being approved as the process favours allocating money to smaller, short-term projects rather than taking a more strategic perspective.

- 3.33 There is a view that there is a lack of senior officer oversight of the process, without the opportunity to scrutinise some of the approved applications. The CIL Governance Policy Document states that "funding applications will not be filtered, based on Management Team recommendations". It is felt that this presents a risk in terms of scrutiny and transparency over spending decisions.
- 3.34 It also means that an opportunity is lost to link the use of CIL into infrastructure programmes that are being delivered across the council, such as transport and connectivity programmes.
- 3.35 Therefore, there is an opportunity to integrate different parts of the Council by bolstering the governance that currently exists at corporate and officer level to underpin a new spending strategy for CIL.

**Recommendation 3 Implement a new governance framework at corporate and officer level to ensure more consistency, transparency, and to integrate different parts of the council.**

- 3.36 To ensure more scrutiny and transparency over CIL spend we recommend strengthening the role of the BCKLWN Management Team, as well as establishing officer-level governance, which will have a wider remit to support not just the governance process but in wider infrastructure planning matters.
- 3.37 We provide an overview of the role and purpose, and key responsibilities of each below:

*Corporate level governance (currently the BCKLWN Management Team)*

- 3.38 From your CIL Governance Policy Document we understand that the Management Team are currently required to review funding applications, to identify whether projects may be linked to corporate projects; consider links to other areas of corporate or partner spend and make recommendations to the Spending Panel on which projects are eligible for CIL funding. However, we understand that in practice this isn't happening effectively.
- 3.39 We recommend that the role of the Management Team in a new process should be strengthened, to provide not just additional scrutiny and transparency, but also to provide more opportunities to link CIL with infrastructure programmes across the Council.
- 3.40 The role of the Management Team should be to provide oversight and strategic direction on your CIL Spending Strategy, and the programme it will fund, and to ensure that this programme adheres to the agreed principles of a new strategy as set out above. It would have a key role in agreeing the programme and evidence (e.g. IDP) which would underpin a new approach.
- 3.41 The key responsibilities of this group should include:
- Provide leadership, oversight, governance and assurance over all S106 and CIL spending decisions before reporting to CIL Spending Panel.
  - Consider / endorse the IDP and any related infrastructure programme.
  - Maintain an overview of S106 funds and CIL balances.
  - Monitor spend & commitments of CIL & S106, and the progress of schemes funded by CIL / S106.

- Resolve any competing priorities, funding or delivery issues relating to the programme or CIL funded projects.

3.42 To avoid creating additional meetings or layers of governance, the responsibilities above could be incorporated into existing Management Team meetings, with specific meetings reserved for CIL matters.

### *Officer Governance*

3.43 From our understanding of the CIL Governance Policy Document and through feedback in the workshop, the role of officers in the allocation of CIL is limited to validating and initial scoring of projects which are then taken to the Management Team to review. The role is limited to the CIL team and officers from across the Council are not involved in proposing or selecting projects which could use CIL. There is a need to move from this to a more integrated way of working.

3.44 There is an opportunity to establish an officer-level governance as part of your new approach to enable better linkages across the Council on infrastructure planning matters, who could play a more active role in identifying infrastructure needs and projects which could be funded by CIL as well as other funding sources.

3.45 We identified in recommendation 1 above a key principle of involving external stakeholders in a new approach to CIL spend. It may prove helpful to engage partners such as the Integrated Care Board (ICB) and County Council in this group to identify and work with them to understand their infrastructure needs and plans and will provide sub-regional perspective to your work which may be helpful ahead of any Local Government Reform process.

3.46 This officer-level group could also perform a functional role, including being collectively responsible for the IDP, Infrastructure Funding Statement (IFS) and any other evidence needed to support your new approach.

3.47 Key responsibilities of this group could include:

- Contribute towards the production of the Infrastructure Delivery Plan (IDP) and Infrastructure Funding Statement (IFS).
- Reviewing and monitoring of CIL & S106 income.
- Escalating risks, issue and providing management information to the corporate level governance regarding CIL & S106 balances & spend.
- Ensure engagement and consultation with all key stakeholders, including external partners.

### **Recommendation 4: consider providing additional support and resources for parish and town councils to enable more informed spend of the Local CIL Fund and Neighbourhood portion.**

3.48 Your suggested approach for CIL allocations includes a Local CIL Fund of 20% which would be allocated to local infrastructure projects via an application process, which would be in addition to the 'neighbourhood portion' of CIL that is passed through to parish councils and / or neighbourhood forums.

3.49 Within this approach there is an opportunity for your council to work in a different way with town and parish councils and neighbourhood forums to encourage them to think about how this Local CIL Fund and the Neighbourhood portion of CIL they receive can be used in a more informed way, considering match-funding with other funding sources (such as

community chest, lottery funding), combining the Neighbourhood portion with strategic CIL, and ensuring their spending decisions are based on evidence.

- 3.50 This would be achieved through providing additional support and guidance on CIL spend as part of neighbourhood planning, and through working with officers who assist town and parish councils and neighbourhood plans.
- 3.51 This is an approach that East Suffolk Council has taken, who offer [support to parishes](#) on CIL which includes a guidance document for Town and Parish Councils, a guide to '[identifying, prioritising and delivering infrastructure](#)' and other resources on spending CIL including a [template for a Parish Infrastructure Investment Plan](#).

### **Part 3: Evidence**

#### **Assessment**

- 3.52 From our workshop we understand that the current IDP which was prepared to support the recently adopted Local Plan was done as a specific exercise to support the examination. You now intend to start preparing a new IDP which will be able to support your new approach to CIL spend as well as a review of the Local Plan (or review of CIL Charging Schedule if needed).
- 3.53 Having an up-to-date IDP is an essential element of any informed approach to spending CIL in a strategic, considered way. PAS will shortly be publishing guidance on a number of aspects of producing an IDP, but one specific element of this which will be helpful for your new CIL strategy is to build in a mechanism which will allow the IDP to be kept up to date in the future and potentially link up with your GIS system – which was identified in the workshop as an aim.

#### **Recommendation 5: Updates to your IDP should be digitised to allow it to be a 'living document'**

- 3.54 Once you have a robust IDP in place it should then be kept up to date to provide evidence on infrastructure requirements (and how they are prioritised) in order that can be fed into your new CIL spending strategy.
- 3.55 This process can be made more efficient by digitising the IDP project schedule, including linking it to GIS mapping, and using the data to create maps, charts or other types of data visualisation to support your CIL allocation process.
- 3.56 We understand your Council currently uses Microsoft 365, and this could be an option to meet the requirements above. We propose that you engage with IT or GIS officers to assist in this process.

#### **3.57 Recommendation 6: Move towards a more programme-based approach for CIL spend**

- 3.58 In recommendation 1 above we propose that a new approach to CIL should be more evidence-led and could adopt a programme-based approach towards planning CIL spending decisions.
- 3.59 This approach would be reliant on an up-to-date IDP to provide the evidence of infrastructure needs in relation to the Local Plan, and a framework to enable decisions to be made as to what projects from the IDP should be funded in any given period.

- 3.60 This framework would allow you to prioritise the infrastructure projects in a new IDP, considering how projects will both support development and growth, support corporate priorities, and how various forms of funding can be used to deliver them. A more programme-led approach would allow the Council to spend in a more proactive way, considering in a balanced way short-term as well as longer-term needs.
- 3.61 We outline below a number of options as to how this can be achieved, based on some best practice case studies that we have found through our work with PAS.
- 3.62 The options below are intended to be applied to the use of your Strategic CIL Fund, rather than the Local CIL Fund or the Neighbourhood portion; The options are:

**Option 1: Priority-led**

A number of infrastructure 'priorities' are agreed on an annual basis, based on need and the infrastructure requirements of sites coming forward from the Local Plan. Funding proposals are then assessed against these priorities. This is the approach followed by Sevenoaks District Council, as described in Appendix B below.

**Option 2: Priority-programme**

Strategic CIL funds are allocated through a Strategic Priority Programme, which sets out the priority projects the Council wishes to fund through CIL and then receives and assess applications against these and other criteria. This is the approach followed by Elmbridge District Council, as described in Appendix B below.

**Option 3: Business Plan-led**

The Council and other partners produce an annual Infrastructure Business Plan, identifying the infrastructure needs, priority projects, funding available from various sources, and an agreed programme of projects to be funded. This is the approach followed by Chichester District Council, as described in Appendix B below.

- 3.63 A brief SWOT analysis is provided in Appendix A to assist in the consideration of the options above.
- 3.64 Recommendation 7: Consider reviewing your CIL Charging Schedule as part of your Local Plan Review**
- 3.65 We understand that your current CIL rates were set in 2010 – and that you took a cautious approach when setting these. Therefore, you may wish to consider a review of your Charging Schedule to ensure you are maximising the amount of CIL you can collect from new development.
- 3.66 In considering this you will have to make a judgment as to whether the time, cost and resources it will take to review your CIL Charging Schedule will result in enough additional CIL to make this investment worthwhile.
- 3.67 To inform this you could work with your Local Plan viability advisers to do a high-level comparison of the viability evidence prepared for the Local Plan against your current index-linked CIL rates or compare these with nearby authorities with similar land values.
- 3.68 In terms of the time, cost and resources to undertake a review, the 3 elements of this are essentially the viability evidence, the evidence on infrastructure need, and the management

of the review and subsequent Examination. If you are intending to do a review of your Local Plan, you could make the review process more efficient by twin-tracking the Examination, or if not, using the evidence being prepared for the Local Plan to inform your CIL review, even if the Examination is done separately.

### **3.69 Conclusion**

- 3.70 In conclusion, it is our view that your Council is in a good position to, in both the short and medium-term, make changes to your processes and governance as well as undertake other activities which will lead to a more informed, transparent approach to allocating CIL, within a governance framework that can ensure infrastructure needs and priorities from across your area are considered, which could lead to the delivery of infrastructure that creates better outcomes for residents and can leverage finance and support from your partners.
- 3.71 The building blocks for this, as outlined above, is an IDP which captures up to date infrastructure needs from infrastructure providers within and outside the Council, and an improved governance framework to ensure spending decisions are taken based on this evidence, as well as being informed by other elements such as your Local Plan and corporate priorities.
- 3.72 In order to make these changes, a short-term priority should be to confirm the principles for a new strategy with your CIL Spending Panel, and seek the mandate from your Council through a Cabinet decision.
- 3.73 Other councils have been through this process and as a result there are some elements of good practice and lessons to be learned from other places. Resources on the PAS website includes:
- [The Improving the Governance of Developer Contributions Handbook](#)
  - [A guide to Infrastructure Funding Statements](#)
  - [A guide on types of infrastructure, approval routes, and funding sources](#)
  - [And a guide to help your senior leadership understand the role of developer contributions.](#)

## Appendix A: SWOT Analysis for Recommendation 6

	Option 1: Priority-led	Option 2: Priority-programme	Option 3: Business Plan-led
Strengths	<p>Retains flexibility to allocate against agreed priorities set on an annual basis by CIL Spending Panel.</p> <p>Provides more opportunity to proactively decide on priorities for the year.</p>	<p>Provides a balance between being strategic and flexible as to how CIL is allocated.</p> <p>Can provide a strong link to plan-led, new development.</p> <p>Provides more transparency and certainty on how CIL will be allocated.</p>	<p>Provides the ability to plan and prioritise CIL spend.</p> <p>Can provide a strong link to plan-led, new development.</p> <p>Allows proactive consideration of various funding sources, including income projections from various sources to inform future planning of spend.</p>
Weaknesses	<p>Still relies on a bidding process rather than being proactive and strategic.</p>	<p>Would require additional officer resource to establish and implement the process.</p>	<p>Would need additional officer-level governance to prepare and agree the Business Plan.</p> <p>Does not offer much flexibility once the Business Plan has been approved.</p>
Opportunities	<p>Current bidding process could be retained, with updates to the assessment criteria to ensure more objectivity.</p>	<p>Offers an opportunity to work with partners to identify priority projects.</p> <p>Offers an opportunity to ensure the assessment of bids is more objective than subjective.</p> <p>Income projections of future CIL revenue could be calculated to inform future spending plans.</p>	<p>Provides an opportunity for more formalised partnership working.</p>
Threats	<p>Uncertainty as to the number and type of projects that come forward.</p>	<p>Would rely on the existing IDP to inform the priority programme until a new IDP is available as part of the plan-making process.</p>	<p>Will require significant officer resource and data to implement and maintain.</p>

	Relies on the quality of the proposals coming forward.	Would require a change to governance and process which may take some time to fully embed, with a need for continual improvement.	Relies on good quality data for project costs, funding sources and income projections.
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## **Appendix B: Best Practice Case Studies for Recommendation 6**

### **Sevenoaks District Council**

#### **Approach to governance and spend.**

The Sevenoaks CIL Spending Board is responsible for making decisions about infrastructure funding. This board is made up of elected members and council officers. The Chair determines the frequency of meetings.

Decisions about expenditure are based on a set of criteria. These criteria are outlined in the Infrastructure Funding Statement (IFS) and the Infrastructure Delivery Plan (IDP). Projects are evaluated based on how well they align with the priorities outlined in the IFS and IDP.

The Board also considers other factors when making decisions. For example, they look at how well a project can unlock proposed new development or allocated sites. They also consider whether a project can demonstrate strong social, environmental, or economic justification.

Finally, the board looks at the potential for maximising other funding sources to support the proposed infrastructure projects.

#### **Criteria used for Decision-Making:**

The Board agrees a set of criteria to inform their decision-making, including:

- Alignment with identified infrastructure types in the Infrastructure Funding Statement (IFS) report.
- Correlation with the Infrastructure Delivery Plan (IDP).
- Direct relevance to proposed or allocated developments.
- Strong social, environmental, or economic justifications.
- Absence of prior CIL funding for the project.
- Endorsement from infrastructure providers.
- Project urgency.
- Feasibility within the next five years.
- Critical need.
- Clarity on funding plans.

### **Chichester District Council – Infrastructure Business Plan**

<https://www.chichester.gov.uk/infrastructurebusinessplan>

#### **Approach to governance and spend.**

Spend is based on an Infrastructure Business Plan (IBP), a 5-year rolling programme based on

- Infrastructure needs,

- Prioritised projects,
- The growth trajectory,
- Estimated CIL receipts, & additional funding sources.

The IBP is endorsed and monitored by an officer-led Development Plan and Infrastructure Panel (DPIP) (on which County can attend), with the final decision made by Full Council, based on an endorsed IBP.

### **Criteria used for Decision-Making:**

The following definitions are used to guide which projects CIL funding should be directed to.

- Critical Infrastructure:
  - Essential for enabling growth, acting as prerequisites for future works. Often linked to triggers controlling development commencement.
- Essential Infrastructure:
  - Necessary to mitigate impacts from development operations. Linked to triggers controlling site occupation, addressing planning acceptability.
- Policy High Priority Infrastructure:
  - Required for broader strategic or site-specific objectives in planning policy or statutory duties. Less direct relationship with population increases, influenced by individual choices.
- Desirable Infrastructure:
  - Needed for sustainable growth but optional for short to medium-term development. Supports sustainable growth without immediate impact on development timelines.

### **Elmbridge District Council**

<https://www.elmbridge.gov.uk/planning/community-infrastructure-levy-cil/cil-strategic-infrastructure-projects>

### **Approach to governance and spend.**

Strategic CIL funds, which support the future growth of the borough from new development, are allocated to Borough-wide infrastructure projects via the Strategic Priority Programme (SPP) which follows the following annual process:

Draft Priority List:

- Creation of a draft Strategic Priority Programme (SPP) list.

Review and Recommendation:

- Strategic CIL Working Group will review the draft list in June and recommend funding priorities to the Cabinet. Cabinet finalises the SPP for the year.

Project Development:

- Infrastructure providers were notified of priorities and developed relevant projects for Strategic CIL funding application.

Application Review and Decision:

- SCILWG reviews applications in autumn and recommends funding allocations to the Cabinet, which makes final funding decisions.

Ongoing Review:

SPP reviewed by SCILWG, allowing for new project proposals based on annual priorities



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