

CIL Neighbourhood fund consultation- Barbican Association Response

The Barbican Association represents the 4000 or so City residents who live on the Barbican Estate

We comment on this consultation as follows:

General comments

In addition to answering the specific consultation questions below, we make the following points:

On Point 6 in the consultation document. *“The City Corporation considers that, for the purposes of CIL, the City of London should be regarded as a single neighbourhood.”*

We disagree. The Local plan recognises different parts of the City, in particular a distinction between parts that have residential concentrations and those that are primarily office locations. The uses of CIL money are likely to differ between residential and office areas.

The proposed suggestion of inviting bids could lead to the position that well organised bids from parts of the City gain all of the neighbourhood funds, leaving well deserved parts without any funding.

If the City is not willing to recognise separate neighbourhoods within the City, it could consider allocating nominal sums (perhaps with floors and ceilings) to say residential areas (or indeed business areas) to ensure that not all of the funds get sucked into one sort of activity.

As part of this, it could offer some officer help (perhaps from the Community and Children’s services) to community groups that have an idea to pursue but few resources to make a bid.

As a recognised residents’ association the BA would expect to be consulted, seriously, about the part of the CIL devoted to community uses for developments in and around the Barbican estate.

On point 29. *“Applications should identify any ongoing revenue costs as a result of implementation of a project, such as future maintenance costs, and identify how these costs will be met and by whom. Additional bids for City CIL Neighbourhood Funds to meet future revenue costs will not normally be accepted.”*

We think this requirement unnecessarily constrains applications. Almost all sustainable “infrastructure” needs ongoing maintenance. If the application for capital expenditure is worthy of funding, then so is an on going portion of the fund to maintain it.

This restriction will lead to the money being spent on “nice to have” one offs, rather than sustainable infrastructure that will have a lasting impact on community improvement and benefit.

We also note that (as stated at Point 7) Neighbourhood funds can be used for

- a. The provision, improvement, replacement, **operation or maintenance** of infrastructure;
- b. Anything else that is concerned with addressing the demands that development places on an area.”

The City's proposal is therefore more restrictive than the rules allow. And the demands that development places on an area are likely to be ongoing – so whatever neighbour infrastructure that is put in place to mitigate the effect of development is likely to need maintenance and running costs.

Responses to specific questions

Consultation Question 1 *Do you agree that City CIL Neighbourhood Fund spending should be guided by the spending priorities set out in the City's Regulation 123 List?*

We support the Regulation 123 list. It allows a broad interpretation of infrastructure, but we would like "education facilities" to be qualified by the word "public" – to make clear that the facilities funded would be available to all.

Consultation Question 2

Do you have other suggestions for spending priorities for the City CIL Neighbourhood Fund?

No

Consultation Question 3

*Can you suggest any specific projects that you consider should be funded through the City CIL Neighbourhood Fund?**

Yes. A Community Centre for the Barbican and the wider residential community of the north west of the City

Consultation Question 4

Do you think that there should be an upper ceiling on bids for the CIL Neighbourhood Fund, or a minimum level? If so, what should these levels be?

No minimum. A community might want a relatively small sum to do some small thing that would make life nicer.

There should be ceiling, lest the neighbourhood funds be used to finance basic infrastructure that should be a local authority responsibility

Consultation Question 5

Do you agree with the list of groups and organisations that would be eligible to bid for CIL Neighbourhood Funds? Are there other organisations that should be eligible?

Not entirely. This is specifically Neighbourhood funding. If the City adopts a definition that the neighbourhood is the entire City and that the business community is a community, the risk is that businesses will gain access to and suck up a substantial amount of this fund.

Please exclude Constituted business organisations and associations from the list.

Please add, An ad hoc grouping of individuals (residents) to pursue a particular project

Consultation Question 6

Do you agree with the proposed assessment criteria for the CIL neighbourhood Fund?

Assessment criteria could be quite onerous for community groups to meet, particularly No 30. At lot depends on the degree of evidence the assessors will require.

The City should set up a simple process for applying, with low barriers to entry. It should not replicate the high bar it expects its own internal projects, put together by City officers, to meet. Otherwise this will undermine the intention of the Neighbourhood fund, and the funds will go to schemes put together by City businesses with professional staff.

The process should be simple and transparent, the applications should be published on a public agenda, and the decisions should be published and should show which applications have been funded and why – and which not.

We also think that applications should be considered at least three times a year (and maybe even four times a year), not twice.

Thank you for the opportunity to respond.

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