

**Wakefield Community Infrastructure Levy Examination
Council's Response to Initial Questions
August 2015**

Legal and procedural compliance

- 1 With reference to the brief declaration of compliance on page 8 of the DCS (CD 101), will the Council be producing a statement to evidence that in preparing the charging schedule it has complied with the legal and procedural requirements in the 2008 Act (Part 11 and section 221) and the CIL Regulations?

Council's Response

- Please find attached the Council's Statement of Procedural and Legal Compliance.

Draft Charging Schedule (DCS)

- 2 Based on the maps provided at Appendix 2 of the DCS and in figures 3.1 and 3.2 of the Viability Evidence for February 2014 (CD 117), it is difficult to establish where the proposed Residential Charging Zone boundaries fall in relation to the residential value areas, development sites and settlement boundaries across the district. It would greatly assist my understanding and examination of the evidence if the Council could provide me with a map at a larger scale overlaying the charging zone boundaries, residential value areas and development sites on an Ordnance Survey base of the district.

Council's Response

- Please find attached a PDF Map containing the information as required above.

Infrastructure Delivery Plan (IDP) evidence

- 3 As the Council has updated the IDP to support the work on the CIL since the Core Strategy was examined, the PPG confirms that it is necessary for me to test the IDP to ensure it is sufficient to confirm the aggregate infrastructure funding gap (Ref: ID 25-017-20140612). Initially, therefore, with reference to the IDP evidence for July 2013 and July 2015 (CD 119 and 104), I would be grateful if you would explain the inclusion of the two new stadium facilities for Castleford Tigers and Wakefield Wildcats as part of the infrastructure funding gap for which CIL is required, but their exclusion from the list of projects in the Regulation 123 list which the Council intends to fund through CIL?

Council's Response

- The Local Plan includes an ambition to secure new stadia facilities in the district in Wakefield and Castleford as set out in Core Strategy Policy CS11. 1. c. for which there is an identified deficiency. There is an outline (10/00225/OUT) and reserved matters permission (13/00766/REM) for a community Stadium for Wakefield Wildcats to be

part funded by enabling development within the outline planning consent. The permission is yet to be implemented. Subject to the enabling development being completed, a funding gap of £2 million will remain.

- There is an approved outline application for a community stadium with enabling development for the Castleford Tigers (13/01486/RPP), which is yet to be implemented. There is an additional outline application for a community stadium with enabling development for Castleford Tigers (14/01440/OUT) which has been approved subject to the signing of the section 106 agreement. In this latest application the enabling development (the 5 Towns Park at Castleford as detailed in the response to Question 8) would fully fund the community stadium, and there would be no funding gap.
- On the basis of the above section 106 contributions are identified as a potential alternative source of funding in the IDP evidence. However, specific figures have not been identified as the agreements are yet to be signed. However, given that there has been an ongoing indication that these stadia will at least be part funded through enabling development secured through section 106 agreements, it was not considered appropriate to include these on the regulation 123 list. This is because according to the CIL Regulations CIL and section 106 money cannot be spent on the same piece of infrastructure.
- However, to date no money has been secured through section 106 agreements to fund the stadia, and there is no guarantee that the funding will be secured in the future through these section 106 agreements. As such, the stadia have been included in the IDP Evidence because they are identified in the local plan as infrastructure required to support the growth of the district and the committed funding remains uncertain. In the event that no section 106 funding is secured for either scheme, CIL money may be used towards funding the stadia despite their exclusion from the 123 list. But if they are included on the regulation 123 list then section 106 funding cannot be secured for them.

Economic Viability Evidence (VE)

- 4 To assist my examination of the viability evidence, I would be grateful if you would provide a copy of the spreadsheets underpinning the results for the site specific appraisals in the Site Specific Testing Preliminary Assessment (CD 118).

Council's response

- Please find attached an Excel Spreadsheet of the Site Specific results headroom calculations which contain the data that is presented in tables 3.1, 3.2 and 3.3 of the Wakefield Site Specific CIL Testing Preliminary Assessment 16 September 2013 (CD117). Detailed appraisal information for the individual sites included in the analysis are also attached.

- 5 Other than the average house price data from 2012 in Appendix 1 of the Viability Addendum (CD 112) and the sample new build sales evidence for February 2014 in Table 3.5 of CD 117, what evidence is there of sales transactions across the district to support the sales value assumptions in paragraph 3.6 of CD 112?

Council's Response

- Annex 1 of the Community Infrastructure Levy (CIL) Draft Charging Schedule Consultation Summary of Comments and Council's Response 2015 (July 2015) (Core Document 105) contains an update of New Build Residential Sales Values in the district for April 2015 (page 61). This provides a comparison with the sales values assumptions in paragraph 3.6 of (Core Document 112). This demonstrates that average sales values in the district have increased to April 2015 from the assumptions that have been used in the viability appraisal.
- 6 Paragraph 3.4 of CD 112 refers to a total of 211.06 hectares remaining from the allocations in the development plan and that 76% of this is greenfield. Please explain how this relates to the Housing Delivery schedule at Appendix 1 of the Site Specific Policies Local Plan which totals significantly more than 211 hectares of land and in which most sites are listed as brownfield. It would assist my examination of the evidence to receive an updated version of Appendix 1 showing the sites that remain to be delivered.

Council's Response

- The figures were based on the Council's monitoring data to 31 September 2014, which analysed allocated housing sites without planning permission as set out in the Site Specific Policies Local Plan (CD203) and the Central Wakefield Area Action Plan (CD204) to 31 September 2014. This did not include housing capacity in allocated Special Policy Areas.
 - Attached is an update of the Housing Delivery Table in Appendix 1 of the Site Specific Policies Local Plan. This includes all allocated sites with a housing capacity in the local plan. Unlike the information in paragraph 3.4 of CD112 allocations with planning consent are included. Sites where development has already commenced are also excluded. This shows that 46.1% of the remaining housing capacity in the local plan, where development is yet to commence, is on previously developed land and 53.9% of the remaining housing capacity is on greenfield land.
- 7 Please provide a worked example of the calculation by which the Maximum CIL per square metre figures for residential development are derived in tables 3.1 and 3.2 of CD 112.

Council's Response

- Please see the attached Excel Spreadsheets containing the *Worked Example from 2.5ha scheme from Table 3.2 value area 2*) and the *Worked Example from 2.5ha scheme Table 3.1 (value area 1)*. These draw out the workings from the viability model and included two variants

with the first (A) being the headroom calculation (where the CIL headroom is residualised with land) and the second where CIL is inserted as a fixed payment (B) to assist in explaining the 'headroom' approach that has been used.

- This work has identified that the wrong version of the results tables 3.1 and 3.2 were included in CD 112. The revised tables have now been included which indicates a slight increase in the headroom for CIL (Value area 1 median increases from £81 to £84 psm and value area 2 from £35 to £42 psm). This is merely a correction to the results table – there is no change to the evidence/input assumptions and there is no impact on the overall conclusions. A revised version of CD 112 is attached (Wakefield CIL Viability Addendum (2014) Revised August 2015).

8 How much additional retail floorspace is planned for the district up to 2026, where is it proposed and what remains to be delivered?

Council's Response

- Please find attached a separate response *Q8 CIL Initial Question Response - Retail*

S106 contributions

9 Page 34 of the IDP evidence (CD 104) refers to an analysis of S106 agreements between April 2010 and April 2015 which indicates an average annual S106 contribution of £1.2 million. Paragraph 4.2 of the CIL Viability Addendum (CD 112) also refers to analysis of S106 agreements which support an average residual S106 cost of £1,000. Where is the analysis and breakdown of S106 contributions to support these figures?

Council's Response

- Please find attached a spate response *Q9 CIL Initial Question Response – s106 analysis*
- In collating this information it has become apparent that the Total units (aggregate of sample sites) for the Small sites should have been 138 and not the 105 that is set out in table 4.3. This brings the average residual non-pooled s1060 per unit figure down to £1,044. This has been corrected in the attached Revised CD112 (*Wakefield CIL Viability Addendum (2014) Revised August 2015*).