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Dave Nash
Policy Manager (Planning and Housing)
Stratford on Avon District Council
Elizabeth House
Church Street
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CV37 6HX

25th February 2016

Dear Mr Nash,

**Stratford-on-Avon District Council Community Infrastructure Levy
Charging Schedule**

Following the initial appraisal of the submitted Community Infrastructure Levy (CIL) charging schedule, accompanying evidence base and representations, I have identified some preliminary questions. It would be helpful if you could consider these and provide further information or clarification prior to the start of the hearing/s.

Residual relationship of S106/CIL once CIL is in place

1. Planning Policy Guidance (PPG) says it is good practice for charging authorities to publish their draft Regulation 123 lists and proposed policy for the scaling back of S106 agreements. Additional clarity is required on what elements of infrastructure would be developed by S106/S278 Obligations once the CIL schedule is in place.
2. Reference is made to the proposed Supplementary Planning Guidance being developed post-adoption of the Stratford Core Strategy. If this is intended to clarify the relationship between CIL and S106/S278 then it would be beneficial to see a draft before the hearing/s. It would be helpful to establish what types of site mitigation requirements would be sought via S106 and how any such contributions would be calculated.
3. The PPG explains how the Regulation 123 list should be scripted to account for generic projects and specific named projects. Many items on the planning obligations list are broad ranging and identify types of infrastructure rather than specific projects. This could have implications for delivery whereby some types of infrastructure may not be able to be funded by S106 where there are more than 5 contributions towards the same infrastructure 'pot'.

Evidence to demonstrate that the proposed contributions towards CIL would not affect viability in delivering the strategic sites.

4. The PPG identifies the need to assess past evidence on developer contributions stating “as background evidence, the charging authority should also provide information about the amount of funding collected in recent years through S106 agreements and information on the extent to which affordable housing and other targets have been met”. It is assumed that the level of contributions on strategic sites would continue to be at a similar level to that currently agreed and so it would therefore be helpful to see these assumptions clearly shown. It is not clear whether these assumptions have been included in the Viability Studies. Furthermore, calculating what was previously negotiated via S106 would be useful for comparison against the proposed CIL charging schedule to ascertain any additional financial impact that CIL would have on development in comparison to historically achieved S106 agreements.

Evidence to support the assumptions in the Viability Study

5. The benchmark or threshold land values have remained the same between the Viability Study dated June 2014 and the Final study dated September 2015. However, the ‘financial headroom’ has increased on some strategic sites. It is unclear as to why. Also, a lack of direct comparable tables makes it difficult to compare between the three sets of data included in each iteration of the Viability Study¹.
6. Similarly, it is not clear from the evidence why the proposed CIL charge for the Long Marston Airfield strategic site has risen from £60² to £75, particularly when the proposed delivery of infrastructure is anticipated to remain the same.
7. There is a lack of sample appraisals in the Final Viability Reports (dated June 2014 and September 2015) and the viability appraisal summaries for the sites are not provided unlike previous iterations of the viability studies. It is thus not possible to consider fully the assumptions made. It would be helpful if these could be provided.

It would be helpful if these matters could be clarified before the start of the hearing/s. Please do not hesitate to contact me (via the Programme Officer) if you have any queries regarding this request.

Yours sincerely

Rebecca Phillips

Examiner

¹ Viability Study September 2013, June 2014 and September 2015

² Preliminary Draft Charging Schedule Consultation Document October 2013