



CIVIC QUARTER AREA ACTION PLAN

**CIL COMPLIANCE STATEMENT
[RELATING TO PROPOSED RESIDENTIAL USES
AND S106 COSTS]**

March 2022

1.0 INTRODUCTION

- 1.1 The purpose of this CIL (Community Infrastructure Levy) compliance statement is to provide further detail regarding how the infrastructure costs contained in Policy CQ11 (Infrastructure and Obligations) of the Civic Quarter Area Action Plan (CQAAP) have been arrived at. The costs covered in this statement are the additional items which apply specifically to proposals for new residential development.
- 1.2 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a) Necessary to make the development acceptable in planning terms;
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 1.3 Paragraph 57 of the National Planning Policy Framework reiterates the Regulation 122 test.

2.0 CONTEXT

- 2.1 Policy CQ11 of the CQAAP is clear that all planning applications for major development within the Civic Quarter would be expected to contribute to the delivery of essential infrastructure. In treating residential development proposals differently from commercial development proposals, the policy identifies that the total financial sum from residential schemes (secured via Section 106 legal agreements) would need to address: health; open space; education; and sports facilities. This is in addition to: utility upgrades; and public realm and environmental upgrades (the two items required to be covered by both residential *and* commercial development proposals). It follows that the financial contribution payable, as set out in the policy, is higher for residential development proposals than it is for commercial development proposals. The respective figures are: £145.81 per sqm (for residential) and £66.89 per sqm (for commercial).
- 2.2 The purpose of this statement is to explain how the uplifted figure for residential has been arrived at, with reference to the formula and assumptions applied for each additional items. In applying these methods, the Viability Assessment supporting the CQAAP as an evidence base document (prepared by Continuum and dated January 2021) estimates that the combined additional costs that would be secured from residential development schemes (based on up to 4,000 residential units) amounts to **£29,919.047**.

3.0 HEALTH CARE

- 3.1 In the absence of an established formula, discussions with the Trafford Clinical Commissioning Group (CCG) were held in order to understand the demands placed on local healthcare facilities as a result of up to 4,000 new homes. It was concluded that one new medical centre would be required, potentially accommodating two GP practices. Using the knowledge of an architect with experience in bidding for NHS schemes, cost estimates were applied based on a 14 room medical practice, to also include a waiting area, reception, small pharmacy, toilets, offices, IT/server room, and staff and store rooms. The building would require a BREEAM certification and would also need to be supported by a 30 space car park. The cost arrived at was **£2.400,000**, which was fed into the Viability Assessment.

4.0 PUBLIC OPEN SPACE

4.1 The combined figure for public open space was calculated using established formula contained in Trafford Council's adopted Revised SPD1: Planning Obligations (2014). In addition, prepared accommodation schedules demonstrating that the Civic Quarter could in fact accommodate 4,347 new units were utilised. The table below (Table 1) indicates how a combined cost of **£3,422,683** towards public open space (including local open space, provision for children/young people, and tree planting) was arrived at (as referred to within the Viability Assessment).

Table 1: Revised SPD1 formula for public open space

SPD Costs			Total	
Local Open Space	£161.59	per person	£1,685,868	
Provision for Children/Young People	£378.95	per person	£352,045	
			£2,037,913	
Specific Green Infrastructure				
Type	No. of Trees		Units	Total Trees
Resi Apartments	1	per unit	4,287	4287
Resi Houses	3	per unit	60	180
				4467
Cost per Tree	£310			
Total Cost	£1,384,770			
Total POS	£3,422,683			

5.0 EDUCATION

5.1 The Education team at Trafford Council was consulted in order to arrive at the level of contribution which should be payable to support new/expanded education provision (at primary and secondary level). The Education team has an established formula, used to support individual planning applications, which was applied. Some adjustments were made, however, particularly to the pupil yield. This was when acknowledging the prepared accommodation schedules and expectations regarding the number of beds to be contained in each residential scheme. The table below (Table 2) indicates how a combined cost of **£15,431,891** towards new/expanded education infrastructure was arrived at (as referred to within the Viability Assessment).

Table 2: Formula for education contribution

Pupil Yield Calculation			
Type of unit	Qty of units	Primary Yield (21%)	Secondary Yield (15%)
Studio	0	0	0
1 bed	0	0	0
2 bed	2,017	424	303
3 bed	565	119	85
Total	2582	542	387

Developer Contribution Calculation						
	QUANTITY			QUALITY		
	2020-21 DfE Rate per place	Pupil Yield (from above)	Developer Contribution towards Quantity of places	School Condition rate per place	Developer Contribution towards Quality of places	Total Developer Contribution
Primary	£13,659	542	£7,406,183	£298	£161,582	£7,567,765
Secondary	£17,757	387	£6,877,286	£2,548	£986,840	£7,864,127
					Total for Civic Area	£15,431,891

6.0 SPORTS FACILITIES

- 6.1 In order to arrive at an appropriate financial contribution towards sports facilities, the established formula applied by Sports England (SE) when determining individual planning applications was applied. For outdoor sport, SE has developed a Playing Pitch Calculator which is used to estimate the additional demand for different pitch types generated by housing growth. For indoor sport, SE uses a Sports Facilities Calculator which provides an indication of the likely uplift in demand for sports hall, swimming pools and indoor bowls.
- 6.2 In particular, SE's consultation response (from March 2020) to a planning application for a residential development (known as Pomona, a short distance from the Civic Quarter) was used as a starting position. This development would have an expected population of 6,500 people (based on 2,708 units). The same SE methodology was applied to the Civic Quarter proposal, in rolling forward the figures when based on an expected population of 10,433 (assuming 4,347 units). The tables below (Table 3 and Table 4) indicate how a combined cost of **£8,664,473** towards indoor and outdoor sports facilities was arrived at (which then features within the Viability Assessment).

Table 3: Formula for sports contribution (part 1)

Pomona	6,500	people	
Outdoor Sport			
Pitches	£1,363,078	circa. 8 pitches	
Changing Rooms	£1,624,568	circa. 10 changing rooms	
Total	£2,987,646		
Indoor Sport			
Sports Halls	£1,091,076		
Swimming Pools	£1,165,654		
Indoor Bowls	£153,791		
Total	£2,410,521		
pro-rata per person	per person	Est. People	Total Cost - pro-rata
Outdoor Sports	£459.64	10,433	£4,795,402
Indoor Sports	£370.85	10,433	£3,869,072
			£8,664,473

Table 4: Formula for sports contribution (part 2)

POS & Sports			
Trafford SPD Residential Capacity of Housing units			
Beds	Capacity	No. Units	Total Capacity
1 bed	1.3	1,765	2,295
2 bed	1.8	2,017	3,631
3 bed	2.5	565	1,413
	1.7	4,347	7,339
Sport England Est. Capacity			
Average	2.4	4,347	10,433
Estimation of Children & Young People	929	from education calc.	

7.0 CONCLUSIONS

- 7.1 This CIL compliance statement has sought to clarify how a total of **£29,919.047** of Section 106 costs pertaining to residential development proposals within the Civic Quarter has been calculated when having regard the need to consider the extra impacts on health, on open space, on education, and on sports facilities. When also allowing for additional costs, the Viability Assessment demonstrates that residential development proposals could sustain a financial sum of £145.81 per sqm to support this infrastructure. This figure then features in Policy CQ11.
- 7.2 The content of this statement provides the required justification that any planning obligation attached to a grant of planning permission for residential development would be compliant with Regulation 122 of the CIL Regulations 2010 (as amended). The Viability Assessment already demonstrates this conclusion in relation to commercial development proposals.