

## Section 106 Justification for: 17/00165/OUT

**Application no:**

**Proposal:** Outline planning application for the erection of up to 95 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Olney Road with all matters reserved except for means of access.

**At:** Stables And Pony Paddocks, Olney Road, Lavendon

The contributions set out in the document are required in accordance with locally adopted Supplementary Planning Documents (SPDs) and/or Guidance (SPGs) which support the Milton Keynes Core Strategy Policy CS21 (previously the Local Plan Policies PO1, PO2 and PO4) and the National Planning Policy Framework (NPPF). Local Plan Policies PO1 and PO2 have been replaced by CS21 whilst PO4 remains a saved policy. The relevant SPD/Gs are:

- Education Facilities SPG (2004)
- Leisure Recreation and Sports Facilities SPG (2005)
- Social Infrastructure SPD (2005)
- Sustainable Construction SPD (2007)

Core Strategy Policy CS21 'Delivering Infrastructure' states that New Development that generates a demand for infrastructure will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:

1. already in place, or
2. there is a reliable mechanism in place to ensure that it will be delivered in the right place at the right time, to the required minimum high standards demanded by this Council and its partners.

The Council will prepare a new Planning Obligations Supplementary Planning Document to cover infrastructure and service requirements, including site-specific infrastructure, to be delivered through Section 106 agreements.

The Council has a number of Supplementary Planning Documents which set out the requirements for contributions to infrastructure from developers outside of the area covered by the Tariff. These cover topics such as education, social infrastructure, leisure and recreation facilities, and transport.

At present, work on the revised Planning Obligations SPD is underway and therefore this application will be considered under CS21, the saved Local Plan policies and adopted SPD and/or SPGs.

In accordance with CIL Regulation 122, the planning obligations sought are compliant with the three statutory tests. The contributions are contained within locally adopted Policies and SPD/Gs and are considered as being required in order to ensure development is acceptable in planning terms. Each contribution is directly related to the anticipated impact of the development and will be spent locally to ensure there is adequate provision of infrastructure and services to mitigate the impact of the scheme. The contributions are calculated in accordance with the Council's SPD/Gs which have been carefully considered to ensure an appropriate level towards each item is reasonably related to the scale of the development. These are calculated based on the number of dwellings and the anticipated number of people likely to be created by a development.

This document has been prepared to aid the negotiations of the s106 requirements required to mitigate the impact of the development in light of current policy and SPD/G requirements.

**Education:**

	<b>Contribution</b>
<b>Total Early Years</b>	£67,303.19
<b>Primary pupils</b>	£332,556.92
<b>Secondary pupils</b>	£357,929.22
<b>Post 16 pupils</b>	£77,636.28

**Leisure Recreation & Sports:**

	<b>Provision Cost</b>	<b>Maintenance Cost</b>
<b>Playing Fields</b>	£49,981.88	£42,750.00
<b>Local Play</b>	<b>£74,812.50</b>	<b>£53,200.00</b>
<b>Neighbourhood Play</b>	£71,250.00	£91,200.00
<b>Community Hall</b>	£22,057.10	n/a
<b>Local Parks</b>	<b>£9,500.00</b>	<b>£13,775.00</b>
<b>Allotments</b>	£8,906.25	n/a

**Social Infrastructure:**

	<b>Contribution</b>
<b>Crematorium/Burial Grounds</b>	£8,702.00
<b>Museums and Archives</b>	£15,228.50
<b>Health Facilities</b>	£149,021.75
<b>Waste Management</b>	£24,583.15
<b>Waste Receptacles</b>	£9,500.00
<b>Emergency Services</b>	£4,786.10
<b>Voluntary Sector</b>	£18,056.65
<b>Milton Keynes University</b>	£68,745.80
<b>Milton Keynes College</b>	£24,365.60
<b>Inward Investment</b>	£18,056.65
<b>Public Art - 1% (Estimated)</b>	£95,000.00

**Carbon Offsetting:**

	<b>Contribution</b>
<b>Carbon Neutrality (Estimated)</b>	£47,500.00

**Total Contribution:** £1,756,404.54**Per Unit:** **£18,488.47**

This gives a total s106 requirement of £1,756,404.54 (£18,488.47 per unit). This includes an indicative figure for Carbon Offsetting to be calculated in accordance with the Sustainable Construction SPD and Saved Policy D4 of the Local Plan.

### **Affordable Housing SPD Requirements:**

Provision of 30% Affordable Housing in accordance with the Affordable Housing SPD comprising 25% Affordable Rent (of which 5% of the development should be at levels broadly equivalent to Social Rent ) and 5% Shared Ownership.

### **Public Transport:**

The Passenger Transport Team has requested that the developer to provide an all-operator annual bus pass for each property. The developer will need to liaise with MKC to arrange these at a suitable time prior to occupations.

The provision of a voucher for each residential unit to entitle the holder to a bus pass valid within the Borough of Milton Keynes for one (1) year from the date of issue and a travel information pack detailing the sustainable transport options serving this site, to include the local bus services and timetable.

The estimated cost of the bus pass and travel information pack is £550 per dwelling assuming 100% take up of the voucher.

The bus stops serving the site may need to be upgraded if this scheme is consented to current standards including Real Time Passenger Information and shelters.

**CIL 123 Compliance:** Bus vouchers are not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and as a financial contribution is not sought to be paid to MKC, Pooling is not an issue in this instance. The bus shelter upgrades would be considered infrastructure however no other contributions have been sought towards the shelters that would serve the development and therefore Pooling is not an issue.

### **Education Facilities SPG Requirements:**

#### **Education:**

Education contributions are required to ensure the impact of the development is mitigated by providing additional school places at all levels. These are calculated in accordance with the Education Facilities SPG (2004) and CS21 using last published DfES figures from 2008-2009.

In this instance, the local school capacities have been checked and existing pressure at Primary Level remains and any development would be adding to existing deficits.

A development of 95 units would create an impact of circa 5 children per year group.

#### **Early Years and Primary Education**

The proposed development is located in the village of Lavendon which only has one primary school offering 20 children per year group. The school is heavily oversubscribed and is currently operating above capacity as alternative school provision is located a substantial distance away. Therefore it is fair to assume that children from the new development would wish to attend the local Lavendon Primary School. Therefore s106 contributions would be required to help negate the impact of the development and provide additional capacity where possible within the confines of the existing building.

## **Secondary & Post 16**

The proposed development is located in the Ousedale catchment area and specifically the Olney Campus. The anticipated impact from the development will increase the rising demand for places in this area. Current data shows a decreasing surplus of places in the area which will be accelerated further by new development within the catchment area of the school. As a result additional places will need to be secured to accommodate future demand from residents in the area. Therefore s106 contributions will be required

**CIL 123 Compliance:** I can confirm that one other contributions have been secured specifically for the primary school provision for Lavendon and none for the Ousedale Olney Campus secondary school provision since April 2010 and therefore Pooling is not an issue.

## **Social Infrastructure SPD requirements:**

The following contributions are calculated in accordance with the Social Infrastructure SPD (2005):

### **Health Facilities:**

This development of 95 dwellings could result in excess of approximately 228 additional registrations and it would affect the Harrold Medical Practice in Harrold.

Harrold Medical Practice is already operating close to their capacity and therefore their ability to accept more patients from new residential developments is limited.

According to our records they occupy a floor area of 331m<sup>2</sup> NIA (net internal area) and their patient list as of 1 April 2016 was 6,094.

Department of Health's Principles of Best Practice stipulate that a surgery with 6,000 patients is recommended to have 434-454m<sup>2</sup> NIA (net internal area) of floor space, which is more than this practice currently has. It should also be noted that the Principles of Best Practice is only concerned with the GP core services and does not provide size guidance for extended services, which most surgeries are offering.

There is a potential to extend the surgery premises and therefore, in order to mitigate the impact of this proposed development, whether it is through physical expansion or rearranging existing space to accommodate additional clinical space.

Further, this development was not expected and therefore the impact of the development has not been considered in any expansion plans and therefore NHS England seek the contribution in line with Social Infrastructure Planning Obligations SPD towards the financial impacts that this additional development will bring to NHS England and the Milton Keynes CCG and to ensure health facilities for the residents of this development can be provided.

**CIL 123 Compliance:** I can confirm that at the time of this application one contribution has been secured specifically for Harrold Medical Practice since April 2010 and therefore Pooling is not an issue.

### **Public Art & Heritage: (based on 1% of GDC (excluding land) for Public Art**

The Public Arts Officer and the Heritage Development Officer have commented that the contributions towards Public Art and Heritage (Museums & Archives) is sought to undertake a project which engages the established community and new residents with the heritage of the area and develops peoples connection with place through creative activity and public art.

The contributions for public art and museums and archives are sought in line with policy PO4 and the Arts and Public Art Strategy and the Heritage, Museums and Archives Strategy 2014 – 23.

We are seeking the contributions for public art and museums and archives in line with policy PO4 and the Arts and Public Art Strategy and the Heritage, Museums and Archives Strategy 2014 – 23.

Recent meetings with Olney Town Council and Lavendon Parish Council have identified that in anticipation of the developments around the area, and potential contributions being secured, they have a desire to develop a public art strategy that link directly to their neighbourhood plan. Therefore we would seek this contribution in order for the aspects of the strategy to be delivered linking public art and wider cultural and heritage assets and activity. Lavendon Parish Council are also keen to support the Lavendon Historical Society which celebrates the heritage of Lavendon and the history of the area.

This links to the following priorities in the strategies:

**Arts and Public Art Strategy:**

- Priority 1 – enhance identity – art commissioning. Create and implement public art plan, creating interactions and connecting new communities with neighbouring established communities
- Priority 1 – Enhance identity – integrating arts. Public art and heritage projects, engage established communities with neighbouring development to consider and profile heritage through public art

**Museums and Archives Strategy:**

- Priority 1 – enhance identity- integrate. Public art and heritage schemes, promoting heritage through public art
- Priority 1 – enhance identity – cultural infrastructure. Cowper and Newton museum, increase access and use of the museum and its stories.
- Priority 2 – increase opportunities – heritage trails. Arts, public art and heritage activity trails, connecting people with place through trails and cultural activity.

**CIL 123 Compliance:** Public Art and Heritage is not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and therefore I can confirm that Pooling is not an issue in this instance.

**Library Contribution:**

On this occasion, the contribution towards library services is not sought.

**Crematorium & Burial Grounds:**

This contribution is sought towards expanding burial facilities in Lavendon to serve the development and the increase in local population. Lavendon Cemetery is located on the outskirts of the village at Bedford Road. The cemetery is managed by Lavendon Parish Council and the contribution is therefore sought by the Town Council to enable additional capacity to be provided at the cemetery. The Parish Council have a project (costed at £15,000) towards providing additional capacity and this contribution would be allocated towards this project.

**CIL 123 Compliance:** I can confirm that no other contributions have been secured specifically for the Lavendon Cemetery since April 2010 and therefore Pooling is not an issue.

**Waste Management and Receptacles**

All properties generate waste which has to be collected and disposed of. Each new property needs to be set up for waste collection involving the provision of bin, box, food waste caddy start up

literature and education, and supply of sacks, and in the case of properties with gardens a compost bin, water butt and associated caddy's and literature.

To dispose of the waste we have a number of infrastructure projects underway which are being sized to accommodate waste arising from the growth of Milton Keynes. These include an anaerobic digester, a residual waste treatment plant, the expansion of vehicle depot provision and waste educational facilities. However, in addition to this are the start-up costs associated with additional waste and recycling collections and education programmes and initiatives to encourage the reduction of waste and promotion of recycling, reusing and reducing waste along with local waste management projects. The Parish Council have a project to provide litter bins and a recycling area within Lavendon, and part of this contribution would be allocated towards these schemes. The contribution from this development would be used towards the expansion of waste education provision to encourage the reduction of waste being created by the development for the development along with the provision of all necessary receptacles to promote on site recycling, as well as funding the provision of all necessary waste receptacles including bins, sacks and caddy's.

**CIL 123 Compliance:** Waste Management and Receptacles are not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and therefore I can confirm that Pooling is not an issue in this instance.

**Voluntary Sector:**

Voluntary activity is a vital component in the life of the community, offering individuals and groups an opportunity to participate, contribute, and control their environment. In Milton Keynes it has been an integral part of creating social cohesion and making people feel part of a community. The voluntary sector in Milton Keynes contains a variety of groups that cover many aspects of activity that are relevant to everyday life for all sectors of the community. The voluntary sector is working on a full-scale programme for extending its capacity to deliver community development and project support associated with the growth in Milton Keynes.

To assist extensions to the capacity of these organisations to provide their services to a wider population a contribution towards the voluntary sector will be sought.

The S106 contribution to the Voluntary and Community Sector should be invested in Community Development work with new residents and provide a grant pot for supporting local activity. The purpose of this funding would be to work with new residents to make sure that those who wish to can play an active and involved role within their new neighbourhood and will be carried out in conjunction with Lavendon Parish Council and Community Action MK.

**CIL 123 Compliance:** Voluntary Sector contributions are not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and therefore I can confirm that Pooling is not an issue in this instance.

**Emergency Services:**

The additional growth of an area puts significant pressure on the Emergency Services, and although these facilities are not provided by Milton Keynes Council, the Council considers it is appropriate to request contributions toward the provision of additional facilities which are required as a direct impact of new developments creating additional units and will directly benefit the residents of this development should they require their service. Contributions towards these facilities have been accepted by Planning Inspectors on previous appeal schemes post-CIL Regulations, as meeting the three tests and making the development acceptable. The three main emergency services in Milton Keynes have indicated that contributions as a result of new development are needed and that the

expansion of these services to meet the demands of growing populations exceeds the funding available.

The contribution would be a local contribution to serve Lavendon and will be spent on supporting the revenue-based service provided by the blue-light services.

**CIL 123 Compliance:** Emergency Services revenue-based contributions are not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and therefore I can confirm that Pooling is not an issue in this instance.

**Inward Investment, University & College:**

Milton Keynes has a strong need for Section 106 contributions towards inward investment and skills (Milton Keynes College and UCMK). Inward investment activities have an essential role to play in supporting economic growth and increasing employment opportunities through encouraging businesses to locate to, or expand in Milton Keynes. However, statistics on skills and unemployment suggest that many in Milton Keynes are currently not benefitting from the growth of the borough nor will they necessarily benefit from future employment opportunities. To change this will require concerted efforts to enhance employability, to increase both basic and higher level skills and ensure that local residents have the skills that new and expanding businesses require.

Milton Keynes is a rapidly growing area, both in terms of population and employment. Between 2003 and 2013, Milton Keynes saw the fastest growth in population and between 2004 and 2014, the fastest growth in the number of jobs (Centre for Cities Outlook 2015, from 64 cities and larger towns). The Core Strategy aspires to 1.5 jobs for every new dwelling and the Local Economic Assessment (LEA) 2016 indicates population estimates of at least 311,000 by 2031 and the creation of over 32,000 new jobs. To balance the impact of such rapid growth will require work around inward investment, skills and employability to ensure the availability of a range of employment opportunities which local residents are in a position to access.

“Articulating a compelling ‘MK Offer’ - Promote Milton Keynes as a premier location for inward investment and as a visitor destination” is one of the priorities within the Economic Development Strategy 2011-2016. Milton Keynes has enjoyed considerable success in attracting investment to the borough and continues to attract businesses to the area. However, to ensure that the right mix of companies are locating to, and expanding in Milton Keynes requires focused interventions via the marketing activities of Invest Milton Keynes as well as ongoing support through the Team’s business engagement programme. Direct marketing to businesses of various sizes and from a range of sectors will facilitate a good mix of industry to provide local residents with potential job opportunities.

With the continued growth of the Milton Keynes population, there is an increasing need for employment opportunities locally. Without these opportunities residents will be forced to seek employment elsewhere which will lead to pressures on transport and infrastructure. It may also lead to the loss of income from the local economy as residents spend their income in the area they work.

Greater inward investment and the greater purchasing power arising from individuals being in employment can be expected to have a positive impact on local businesses and may generate further employment opportunities, which in turn generates the demand for additional housing.

The Milton Keynes proposition requires the promotion of a skilled workforce which businesses are able to utilise; this is key in the decision making process of potential inward investors and existing businesses wishing to expand. However, there are challenges currently around skills. At 35.6%, the proportion of the working age population qualified to NVQ level 4 and above in Milton Keynes is

below the regional and national rates, of 39.8% and 37.1% respectively. The proportion with no qualifications, at 9%, is above that in the south east (6.3%) and Great Britain (8.6%). The proportion of students achieving five or more GCSEs, including English and Maths, at grades A\*-C is below the national average (52% in MK compared to 53.8%). And the proportion achieving five or more A-levels at grades A\*-E in 2015 stood at 69.1%, considerably below the national average of 77.9%. And according to the Centre for Cities publication "Fast Growth Cities: the opportunities and challenges ahead" (March 2016):

*Milton Keynes, which has a high share of KIBS jobs but no strong higher education institute, is currently able to meet its need for high skilled workers by people commuting into the city each day. But with congestion increasingly an issue within the city, there are questions over how long this will remain the case".*

The Milton Keynes Business Survey 2015 found around one in six businesses had experienced hard to fill vacancies, with approximately one third citing the cause to be a low number of applicants with the required skills. 14% cited a lack of qualifications. The survey also found that just under a quarter of businesses experienced skills gaps within their existing workforce. However, despite such skills issues with potential and current employees, the level of training offered by businesses in Milton Keynes is lower than that offered by businesses across the South East Midlands Local Enterprise Partnership (SEMLEP) and nationally.

Although the proportion of individuals claiming Jobseekers Allowance (JSA) in Milton Keynes is comparatively low and generally falling, wider unemployment levels are amongst the highest in the SEMLEP area (behind Luton and Corby). The wider unemployment measure, which includes all individuals actively seeking employment and able to work, stood at around 7,700 individuals towards the end of 2015. One possible reason for higher levels of unemployment could be a mismatch between the skills and experience held by individuals and the skills and experience that businesses are seeking. Addressing this mismatch is at the heart of the Milton Keynes Skills Strategy.

Already Milton Keynes experiences significant net in-commuting. Figures from the Census 2011 revealed that 44,500 individuals commute in to Milton Keynes for work daily, with just short of 28,000 commuting out. Given the increase in job numbers since 2011, it is fair to assume that the number of in-commuters has risen. And with continued efforts to enhance employment growth through inward investment and business support activities, if businesses are unable to recruit employees locally, then further in-commuting will arise, bringing with it challenges around transport and infrastructure.

As evidenced above, there is a compelling argument for continued Section 106 assistance and funds to support inward investment, skills and employability. Sustainable economic growth is dependent both upon a successful and diverse business base and on the population having the skills to secure the employment opportunities these businesses create. To maintain and enhance the business base in Milton Keynes will require the continued, increasingly focused, promotion of the area as a place to invest, live and work, as well as effective aftercare and support for new and growing businesses. Local education and training establishments such as Milton Keynes College and UCMK have a vital role to play in ensuring that local residents have the skills that businesses require. Not only will enhancing the skills of the local population result in fewer recruitment difficulties for businesses, but it should lead to greater productivity within businesses which can drive further growth. And the availability of a skilled labour force is a key selling point in promoting Milton Keynes to other inward investors. Supporting inward investment, skills and employability through Section 106 contributions will have wider multiplier effects across the Milton Keynes economy, supporting continued and more equitable growth and generating a range of economic and social benefits.

**CIL 123 Compliance:** Inward Investment, University and Colleges (skills) contributions are not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and therefore I can confirm that Pooling is not an issue in this instance.

**Leisure Recreation & Sports Facilities SPG (2005) Requirements:**

The following contributions are calculated in accordance with the Leisure Recreation & Sports Facilities SPG (2004):

**Community Facilities:**

The community facilities contribution is sought towards the existing community facilities in Lavendon. The nearest community facility to the development would be the located on the High Street. This community facility offers a number of community functions to the residents of Lavendon hosting various leisure activities for the whole community.

Whilst the community hall is currently undergoing a series of improvement projects undertaken by the Parish Council and Village Hall Committee, further works will need to be considered to accommodate the growing demand due to the recent increase in development in Lavendon and therefore the need to ensure the facilities are able to accommodate the growth.

The community facilities contribution is sought towards enhancements to the centre to facilitate additional community offering to support the increased population, to provide enhanced and additional capacity to allow the new residents to integrate into the existing community in Lavendon. This contribution would be spent on improvements to the existing building to rationalise and improve existing space to bring into active use, to improve the building and interior to facilitate a wider range of activities and purchase equipment and furniture to support these community uses and to look at the scope of extensions, and to improve the outside areas to accommodate additional usage.

**CIL 123 Compliance:** I can confirm that one other contributions have been secured specifically for the Community Facilities in Lavendon since April 2010 and therefore Pooling is not an issue.

**Playing Fields:**

The Playing Fields contribution is sought towards enhancements to the existing playing fields located behind The Glebe/High Street.

The existing playing fields are well utilised by the residents of Lavendon and further developments cumulatively create additional demand. The existing playing fields require improvements to the drainage and setting out to ensure the playing fields can support additional users and demand throughout the year, along with ongoing maintenance. The Parish Council would also like to purchase additional equipment to use within the playing field to support additional demand.

**CIL 123 Compliance:** I can confirm that no other contributions have been secured specifically for the Playing Fields in Lavendon since April 2010 and therefore Pooling is not an issue.

**Local & Neighbourhood Play, Local & District Parks:**

This development will increase the demand on local parks and play areas within the area, as the accommodation will be for families the provision of high quality recreational facilities will be very important to these residents– as set out in local plan appendix L3, SPG Leisure and Recreation and adopted Play area Action Plan (2013).

As Lavendon is some distance from other parks and open spaces so it is vital the accessible ones are of high quality. This is especially important for children as they have least access to transport. Such

facilities for play and social interaction are vital parts of development both physically and cognitively. There are several parks and play areas that will be accessible and directly related to the development that can have additional facilities added to meet the additional impact of this development, and this Parish Council support this approach.

The main recreation ground would be the most accessible site to this development with, no main roads to cross and about 200m away from the proposed development.

The local play contribution highlighted in the table above in yellow can be removed if a Local Play facility (LEAP) is provided on site. The Local Parks contribution highlighted above in green can also be removed if suitable local park provision is made on site. Please refer to Policy L3 of the Local Plan and any specific consultation comments around provision requirements. The maintenance contributions for these items would then not be payable in accordance with the table above, rather they would be calculated based on the specification of the LEAP and/or Local Park provided on site using the council's maintenance costs using a 20 year multiplier. This would be secured through the s106 agreement with a suitable mechanism to enable the calculation to be carried out once the specification of the onsite provisions have been agreed.

IN the event they are not provided on site, the Local Play, the Local Park as well as the Neighbourhood Play contributions would be used at the Recreation Ground and around the village to add additional age appropriate equipment to mitigate the impact of the additional dwellings.

The project would include extending the single goal end to a MUGA, and/or fitness equipment for older children along with additional play items for younger and less able. Proposals could also include installing paths into the play areas and link to the estate paths to the open space to provide connectivity through the Recreation Ground. For the avoidance of doubt, the Neighbourhood Play contribution is sought for offsite enhancements in either event.

The Parish Council would also like to see improvements to the natural habitat at The Copse to encourage wildlife, as this area is utilised by the school children to learn about wildlife.

Failure to secure a contribution will reduce the life span of existing equipment, cause friction between users, increase maintenance burden and limit the play and recreational facilities for all local residents

These contributions sums are a fair and reasonable in relation to the scale and type of development propose

These contributions are required to meet two of the three dimensions of sustainability as laid out in NPPF:

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change

The contributions are based on adopted local policy – Adopted Local Plan - Public Open Space Framework 2014 – Play area Action Plan 2014 – Supplementary Planning Guidance Recreation and Leisure (2004) - identifies the main requirements for Leisure, Recreation and Sport, which will be required as a consequence of new residential development within the Borough. It also sets out the

financial contributions, which will be sought by the Council from applicants seeking planning consent for development, where that development generates a need for such facilities.

Access to Public Open Space is a vital element of any community however the additional pressure on existing facilities needs to be ameliorated.

**CIL 123 Compliance:** I can confirm that no other contributions have been secured specifically for the Recreation Ground in Lavendon since April 2010 and therefore Pooling is not an issue.

**Allotments:**

The Allotments contribution is required to improve the existing allotments in Lavendon. Due to the scale of the contribution, it would be used to rationalise existing space and improving the allotments to facilitate the provision of additional plots, access and parking. Allotments are the responsibility of Lavendon Parish Council who will ensure enhancements take place to ensure the residents of the scheme can access allotments.

**CIL 123 Compliance:** I can confirm that no other contributions have been secured specifically for the Lavendon Allotments since April 2010 and therefore Pooling is not an issue.

**Sustainable Construction: Based on £200 per tonne of anticipated carbon emissions within the first year of operation (including regulated and non-regulated emissions, including appliances and lighting etc) – Estimated at £500 per dwelling**

The Sustainable Construction SPD requires the applicant to submit a report to the Council following the checklist contained within the SPD to demonstrate the anticipated amount of carbon to be emitted by the development within one year. This is calculated at the rate of £200 per tonne of carbon. The calculation is carried out once the development has been built to provide an accurate estimation based on what has been built, in accordance with saved Local Plan Policy D4 and the Sustainable Construction SPD. The estimate provided is for indication purposes only to give the applicant an indication of the likely level of contribution based on the proposal of 95 units. This level of contribution may increase or decrease based on the level of sustainable construction employed through the development of the scheme, and the calculation is carried out prior to occupation to accurately reflect this.

**CIL 123 Compliance:** Carbon Offsetting is not considered as infrastructure in accordance with the CIL Regulations 2010 and the Planning Act 2008 (definitions of infrastructure) and therefore I can confirm that Pooling is not an issue in this instance.