Ref.	AV Summary of representation	AV Input
LRM Planning (for Bloor Homes), March 2026	Para 30 – Bloor seek further clarification on the following points in the Bruton Knowles report (prepared for Bloor) 1. Further analysis to be undertaken on residential value assumptions – both open market and affordable; 2. Further analysis of residential assumptions in relation to storey height and form; 3. Affordability assessment in relation to the assumed adoption of NDSS; 4. Further analysis when attempting to adopt Land Registry and EPC figures in guiding GDV estimates; 5. Consistency regarding base construction costs; 6. Consistency regarding contingency allowance; 7. Increased Professional Fees allowance; 8. Apparent lack of infrastructure or abnormal development cost allowance in modelling; 9. Transparency regarding cashflow modelling and increase finance rate; 10. Update allowances for M4(2) and M4(3) additional costs, Part L& F, Future Homes Standards, EV charging and BSL; 11. Adjust profit allowances to reflect the prevailing S106 affordable housing market, First Homes, and Self Build/Custom Build; 12. Consistency regarding Benchmark Land Value and more accurate reflection of EUV.	See specific points below. Also see Appendix 8 – Stakeholder Feedback Matrix in the main CIL Viability report.

Ref.	**AV Summary of representation**	**AV Input**
Burton Kowles (for Bloor Homes)	**Section 2.2 – Residential Typology Assumptions**	
	[Paras 2.2.1 – 2.2.2] The Report applies a density of 30 dph to sites with fewer than 100 dwellings, and 40 dph to those above 100 dwellings…at 40dph, the residential coverage generated by combining these density assumptions with the residential house types/sizes adopted, is in the order of 16,750 sqft per net developable acre which is simply too high a coverage figure to adopt for viability testing. The report adopts a mix of dwellings which differ on floorspace and bedrooms but it is unclear how, or whether, the GDV assumptions account for storey height (i.e. 2, 2.5 or 3 storey) or the form of each house (i.e. detached/semi/terrace)..	The typologies adopted in the study are intended for high-level plan-making purposes and are not designed to replicate every scheme in detail. They provide a consistent and proportionate basis for testing viability across the area(s). The density assumptions and the mix assumptions are based on the policy requirements set out in the Local Plan and HEDNA. These were found to be sound at the recent Local Plan examination.
	[Para 2.2.3] NDSS standards have been applied to house size assumptions, but this has not been accompanied by an assessment of affordability…	This is for high-level CIL rate setting and not intended to replicate a developer's specific house types or specific pricing. The unit sizes are based upon policy requirements and the detailed market research contained within the Residential Market Paper (See Appendix 1). These assumptions were consulted upon at the CIL stakeholder workshop in October 2025 and we have not received any additional feedback on this point. We are therefore confident that our high-level typology assumptions are appropriate (in the round, having regard to the CIL viability buffer).

Ref.	AV Summary of representation	AV Input
Burton Kowles (for Bloor Homes)	**Section 2.3 – Residential Value Assumptions**	
	[Paras 2.3.1 – 2.3.3] …adoption of Land Registry Sales data and EPC floor area can inflate the house value assumption as it might compromise increased specification, cashback, deposit paid, SDLT, etc.. incentives are in regular use and typically account for 2.5% - 5% of the recorded Land Registry price. floor areas reported within Energy Performance Certificates (EPCs) do not represent the GIA measurement. LR and EPC data does not confirm number of bedrooms or storey height…	The CIL study's value assumptions are informed by a wider residential market review (See Appendix 3 – Residential Market Paper) and were subject to stakeholder consultation in October 2025. We received a single representation challenging the residential value assumptions, supported by analysis based on their own sales evidence. While this has been considered, the values adopted in this study are underpinned by a broader market review. This draws on evidence from a wider geographic area and a more diverse range of development typologies. The analysis also reflects both achieved sales values and new-build asking prices, providing a more comprehensive view of current market conditions.
	[Paras 2.3.4] The report assumes Social Rent at 37.5% of OMS and Intermediate at 70% which can no longer be relied on and sensitivity testing should consider the likelihood of transfer values.	The transfer values adopted were consulted upon and no detailed alternative evidence has been submitted to support a different position at plan level. Hence, we have applied the same transfer values, consistent with our latest Local Plan Viability Report (2024). At the CIL Stakeholder Workshop in October 2025, feedback was received a single representation noting that an investment-based approach may result in lower transfer values. This has been noted. However, at a plan-wide stage, a simplified and proportionate approach has been adopted by applying a percentage of market value as a proxy transfer value.

Ref.	AV Summary of representation	AV Input
	[Paras 2.3.5 – 2.3.8] ..We hypothesise that the Aspinall Verdi analysis applies too much weight to the premium values achieved on smaller, bespoke, village developments, despite the larger estate schemes making up the vast majority of housing delivery and CIL generation. There is very limited sales data for flats away from the larger settlements of Worcester and Malvern. The adopted OMS value for flats is not realistic.	While Land Registry and EPC data have inherent limitations, these sources were not relied upon in isolation. In addition, the AspinallVerdi reviewed a broader evidence base which included asking prices for specific house types. AspinallVerdi included 3% for marketing incentives in the costs (in addition to Agent and Legal fees). The value assumptions have been derived in the round based on the detailed evidence in the Residential Market Paper (Appendix 3). The scheme mixes (including flats) have been established based on the policy requirements and the HEDNA. We note the concerns regarding flat values; and the specific mix of units can be negotiated on a site-by-site basis.
Burton Kowles (for Bloor Homes)	**Section 2.4 – Residential Cost Assumptions**	
	[Para 2.4.2] Aside from a BCIS based build cost and 15% for 'External Works', the appraisal does not appear to make any allowance for inevitable site-specific servicing/infrastructure and site-specific abnormal development costs. Whilst the 'External Works' allowance is at a regular industry adopted level; it will only cover standard plot costs (driveways, driveways/parking, standard services connections) and frontage estate roads (to include lighting, utilities and street furniture). This allowance does not cover "boundary walls, phase infrastructure, utilities, drainage, landscaping, SUDs, amenity space etc" as AV states.	A clear distinction is maintained between normal external works—allowed for within the appraisal—and site-specific abnormal or opening-up costs, which should be reflected in the benchmark land value (See Appendix 4 – Land Market Paper) rather than added to build costs. This approach is consistent with PPG guidance to avoid double counting. It is important to note that the strategic sites which carry significant infrastructure costs are excluded from CIL.

Ref.	AV Summary of representation	AV Input
	[Para 2.4.3] It is unclear why differing Contingency allowances have been adopted for Brownfield and Greenfield development at 5% and 3% respectively.	The differentiated approach to contingency reflects the relative risk profiles of different development types, with lower allowances applied to more predictable greenfield schemes and higher allowances applied to brownfield and flatted developments. It was presented at the Stakeholder Workshop in October 2025, where limited feedback was received which suggested a 5% contingency across all development types. However, a differentiated approach has been retained to better reflect the varying levels of risk associated with different schemes, and is consistent with approaches adopted in other authorities.
	[Para 2.4.4] The 6.5% allowance for Professional Fees is insufficient and a figure of 8% should be adopted.	The professional fees allowance has been set at 6.5% for construction-related costs, with an additional allowance made separately for planning and application-related fees. This reflects the scale and nature of a plan-wide typology exercise, where assumptions are necessarily standardised across a range of development scenarios. At the Stakeholder Workshop in October 2025, a single rep suggested a higher overall allowance of 7–10% to reflect both pre- and post-planning costs. However, as these elements are treated separately in this assessment, the adopted allowance is considered appropriate and consistent with typical viability practice.
	[Para 2.4.5].. the cashflows behind the residual appraisal summaries are not visible… Further, the apparent finance rate adopted is 7%, which we consider	The finance assumptions reflect a scheme-agnostic approach appropriate for typology testing. The approach and rate were consulted upon at the Stakeholder workshop and we received no additional feedback on this point. It is not CIL Viability best

Ref.	AV Summary of representation	AV Input
	insufficient and a rate 4% above the Bank of England Base Rate of 3.75% should be adopted – i.e. 7.75%.	practice to publish detailed cashflows which would be disproportionate for 'high-level area based studies'. Please also note that our interest rate assumptions reflect prevailing market trends at the time of preparation and it should be kept under review to ensure they remain representative of current lending conditions.
	[Para 2.4.6] The allowances of £625 and £12,133 for M4(2) and M4(3), respectively, are low. A more contemporary allowance for M4(2) would be £1,800 per required property and for M4(3)2a £15,000 per required dwelling.	Allowances for regulatory requirements, including accessibility standards and energy performance, have been incorporated based on available benchmarks and consultation feedback (See Appendix 1 – Policies Matrix). In addition, recent plan-level viability studies and industry evidence indicate that many M4(2) requirements are becoming embedded within modern construction methods and reflected within BCIS costs. We are therefore content with these allowances over and above current day BCIS costs.
	[Para 2.4.7 – Para 2.4.9] With regard to Part L&F cost allowances.. the report groups these together and makes an allowance of £5,816 per house and £2,712 per flat. Neither cost item is fully accounted for in BCIS Average Prices (max. 5 yrs) adopted by AV. We estimate the AV allowances to be too low and should instead be reflected by Part L/F allowances of £2,425 per dwelling and an FHS allowance of £8,000 per dwelling. An allowance for EV charging at £950 per applicable dwelling should be made, with this not being fully accounted for in 5-year BCIS Average Prices.	We have not included for BSL. At the time of preparing the CIL Viability study it was not clear that BSL would definitely be applicable. It is still the case that government is consulting on exemptions from the BSL. Given the need to base the appraisal on confirmed costs at that point, BSL was not included within the base assumptions. The position can be kept under review as part of future monitoring or review work. The differentiation in land values between Greenfield and Brownfield already accounts for existing use value differences.

Ref.	AV Summary of representation	AV Input
	The impending Building Safety Levy ("BSL") is not accounted for in the report. The chargeable rate on open market dwellings on non-previously developed land being £33.05/sqm (Wychavon), £29.74/sqm (Worcester) and £29.56/sqm (Malvern Hills). The Report appears to adopt £1,003 per (greenfield) dwelling to reflect a requirement for Net Biodiversity Costs on greenfield sites and £268 per dwelling on brownfield sites. The Report does not consider the implications for the gross:net site ratio or the significant cost of offsite delivery.	The DEFRA Impact Assessment remains the only nationally consistent and methodologically transparent source for estimating BNG costs at this plan-making stage.
Burton Kowles (for Bloor Homes)	**Section 2.5 – Profit Assumptions**	
	[Paras 2.5.3 – 2.5.4] … the profit requirement for First Homes should be akin to open market dwellings at 20% of GDV. We therefore query whether the regularly adopted 6% of AH GDV profit figure is still valid and recommend that it should also be sensitivity tested in the range of 6% to 10%.	We have included 20% and 6% profit on Market and Affordable housing respectively which is considered 'best practice' for area-based CIL and Local Plan viability studies. This was consulted upon at the Stakeholder Workshop and is consistence with the assumptions at Local Plan examination. In terms of First Homes, these are defined as affordable housing in the NPPF and by definition are 'lower risk' than market housing (as they are sold to qualifying purchasers at a 25% discount). In relation to affordable housing more generally, the assumptions adopted fall within a reasonable range for plan-making purposes in accordance to PPG. The Appraisals contained at Appendix 9 – Residential Appraisals include sensitivity analysis on the Profit v CIL.

Ref.	AV Summary of representation	AV Input
	[Paras 2.5.5] SWDPR will seek 5% self-build/custom build on scheme of 20+ dwellings. The Report does not appear to address the viability implications of this and does not differentiate them from the open market element of each scheme.	We have not appraised any self-build schemes explicitly. Self-build housing would be CIL exempt in any event. All our residential typologies are on the basis that land can be acquired and developed into a new unit (including appropriate allowance for profit). Where self-building involves plot sales and/or part completed units (e.g. foundations, or 'wind and watertight') the working assumption is that the developers' profit is commensurate with the development work undertaken and therefore there is sufficient development surplus to incentivise the self-builder to complete the unit.
Burton Kowles (for Bloor Homes)	**Section 2.6 Residential Land Value Assumptions [BLV]**	
	The adopted EUV of £8,500 is lower than typical market evidence for pure agricultural land transactions, which is regularly in excess of £10,000 per acre for agricultural parcel without hope value.	EUV is derived on a gross basis because this reflects what a landowner would actually transact against. In any event we have applied an uplift / premium to the EUV to derive the BLV. Uplifts are applied to the gross acreage. We then show a net figure purely for transparency and benchmarking (See Appendix 4 – Land Market Paper). Regarding EUVs (or BLVs), no further evidence was provided at stakeholder consultation stage or through reps.