South Worcestershire Councils

Community Infrastructure Levy

Redacted Consultation Representations

Malvern Hills District Council

Worcester City Council

Wychavon District Council

good services, good value

From: [redacted]
Sent: 10 February 2026 19:59
To: SWDP - WCC <SWDP@worcester.gov.uk>
Subject: CIL charging consultation

Thankyou for the chance to contribute to the CIL inspection and its very encouraging that finally this dire situation is being considered.

In my view, I think that the developers should contribute 100% of the cost of building the required infrastructure and have it all in place before any more houses are built. In recent years many houses have been built in this area and the roads, doctors, schools, hospitals especially have not been upgraded adequately. So now we are in a dire situation with waiting times at hospitals and doctors and traffic congestion beyond anything seen before. Regarding hospitals, the Alex in Redditch was at one point going to be amalgamated with Worcester Royal !!! Cleary Worcester Royal could not cope with this so now the Alex is being limped along "all be it admirably". By this it is obvious that we do not have enough hospitals. Developers at their cost should build more hospitals. Quite simply you cannot have the one without the other unless healthcare is reduced, which is totally unacceptable in favour of developers profitability. Meanwhile the developers are making a fortune and leaving us with the mess left behind. I don't see any reason for the existing residents to be charged for this infrastructure improvement, only to spoil their own rural environment through unwanted over population and Worcester County Council I read recently are on the verge of bankruptcy. This leaves in my mind only one culprit that should ensure infrastructure is in place before they start building yet more houses, if this is what is being forced on this area. This is a rural area and should stay that way and building on greenfield sites is something the current government are against.

In order to restore this to an acceptable situation the developers of ANY future house building projects need to make considerably larger contributions if only to level this disaster. They have already made fortunes by building many houses without adequate improvements in infrastructure. The very same companies should now pay for this disastrous decline in infrastructure. If at some point in the future their contributions have achieved equilibrium then at that point and only that point could CIL be reconsidered.

I would like to remind you of the dire state of our rivers UK wide, due to untreated sewage being dumped in them. The reason for this seems to be incapacity in the system to cope with the increase in housing developments, especially regarding trickling 24/7 in any river condition [flood or drought] of raw sewage into the rivers to take the weight off the treatment plants. As in one case I am aware of, if this gets spotted the water company operative immediately without question turns of the trickle. Obviously they are not supposed to be doing it !! Normally the outlet pipe is below water level so is imperceptible. In drought conditions on the River Wye last year it was spotted with the outlet pipe being above the water level. This is happening because the water companies do not have the resources to build new treatment plants so are just fire fighting with the funds that they have, while the real culprits ie the developers are doing what you might call a "hit and run". If the developers were forced to completely cover the cost of building new treatment plants with extra capacity for the future "as the previous ones obviously were" this situation could be resolved now and for the future. This problem will not go away until this is done. I remind you that we extract our DRINKING WATER from these rivers. The cost of ongoing health issues due to this could be astronomical.

Acknowledging the case in the High Court at the moment where 4000 people are taking Welsh Water and others to court for destroying the River Wye and decimating numerous business's that rely on the river. This is surely a situation we don't want to be in.

Didn't the Victorians do well !! They built sewers 120+ yrs ago that we are still relying on now. Now is the time to update with similar capacity in mind if we are going to stand half a chance of keeping our environment clean for any amount of time into the future, as opposed to just patching it up for the time being.

As far as the traffic situation is concerned, this again needs extensive improvements at the cost of the developers because Pershore and especially Evesham become gridlocked for long periods during the day and Evesham has a bypass !!! Again due to increased housing developments which have been and are still being built here there and everywhere without consideration for the road network or the environment. This kind of quantity of traffic in such a confined space is already having major health issues for the residents. Breathing difficulties are very common these days, for some who have never smoked for instance. I had one friend who died from cancer caused by diesel fume inhalation due to being a keen cyclist on the local roads in this area. In the past, pre catalytic converters diesel fumes were visible and being something in the region of PM10 in size. If inhaled they weren't good obviously but likely to be coughed up. Today we have catalytic converters which make diesel fumes almost invisible due to being around PM2.5 in size. The issue here is you can't see them so the place looks clean but you ARE breathing them in and due their microscopic size will get into the blood stream and organs of the body causing very serious health complications, as they did for my friend.

I know this isn't something we can resolve overnight but we do need to consider what future implications more and more housing and traffic is going to do to us all.

Regards

[redacted]

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
T: 01623 637 119 (Planning Enquiries)
E: planningconsultation@coal.gov.uk
W: www.gov.uk/coalauthority

For the attention of: Planning Policy Team
Wychavon Council

[By email: SWDP@worcester.gov.uk]

13th February 2026

Dear Planning Policy team

Re: South Worcestershire - Draft Community Infrastructure Levy (CIL) Charging Schedule

Thank you for your notification of the 6th February 2026 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

I have reviewed the Councils that make up South Worcestershire (Malvern Hills District, Worcester City and Wychavon) and only the Malvern Hills area has recorded coal mining features present.

This current consultation relates to a draft CIL Charging Schedule and I can confirm that the Planning team at the Coal Authority have no comments to make on this document.

Yours faithfully

[redacted]

Principal Planning & Development Manager

Making a **better future** for people
and the environment **in mining areas**

From: [redacted]
Sent: 16 February 2026 14:37
To: SWDP - WCC <SWDP@worcester.gov.uk>
Cc: [redacted]
Subject: CIL Draft charging schedule for 2026

You don't often get email from [redacted] Learn why this is important

CAUTION: This message originated outside of South Worcestershire council's IT network.
THINK TWICE before clicking links, attachments or QR codes.

Hello
We are small house builder/developers based in Callow End, Worcester, who only build in the South Worcestershire area.
We have built some 250 new homes in the last 29 years. We employ our own key staff, buy land, build houses and sell them.

We have been struggling for the last few years to find economic sites suitable for ourselves. We usually build small sites of up to 9 units, very occasionally up to say 14 units. Most or our sites are in rural areas.

It is common knowledge that new house building has been extremely low over the last few years, and that SME developers like ourselves have been particularly badly hit by the combination of limited land availability, high land prices (exacerbated by scarcity), planning delays, and difficulty in obtaining finance. You can see the effects of this in the massive reduction in the number of house builders like ourselves in this area.

While in theory charges such as the CIL should come off the land price, that does not happen in practice at the smaller end of the market. Since little land is available, landowners simply hang on.

I am looking at one rural site of c9 units. The potential CIL of ?120/m2 under the proposed scheme would be c?130,000. The landowner will not lower his price, and we certainly cannot carry that cost.

I genuinely do not see how the smaller house builder can survive under this regime.

Yours faithfully

[redacted]

[redacted], Director
Court Property Developers Ltd
Priors Court
Callow End
Worcester WR2 4TJ

[redacted]

www.courtproperty.co.uk
"What3Words" address = disposing.handbag.hamster

From: SM-NE-Consultations (NE) [redacted]
Sent: 23 February 2026 11:54
To: SWDP - WCC <SWDP@worcester.gov.uk>
Subject: FAO Planning Policy Team Draft Community Infrastructure Levy (CIL) Charging Schedule

You don't often get email from consultations@naturalengland.org.uk. Learn why this is important

CAUTION: This message originated outside of South Worcestershire council's IT network.
THINK TWICE before clicking links, attachments or QR codes.

Your Ref: Draft Community Infrastructure Levy (CIL) Charging Schedule
Our Ref: 540756

Dear Sir or Madam

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the Draft Community Infrastructure Levy (CIL) Charging Schedule for the South Worcestershire Development Plan Review.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully

[redacted]

Operations Delivery
Consultations Team
Natural England
Worcester Team

[redacted]

www.gov.uk/natural-england

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

South Worcestershire Councils
Community Infrastructure Levy
Draft Charging Schedule Consultation

Please return by **11:059pm on Monday 02 March 2026 to:**
South Worcestershire Development Plan Team
Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT
or email swdp@worcester.gov.uk

Ref:

(For official use only)

How we will use your details

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation 2018. Please note that your name and comments may be made publicly available when displaying and reporting the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the council's website, but the original representations with personal details redacted will be available in full for inspection on request. Your details will be retained in order for us to validate your comments. We will use these details to continue to notify you of the progress on planning policy documents within south Worcestershire. If you no longer wish to receive notifications you can e-mail us or write to us to be removed from the consultation list however this will impact upon your right to be notified of progress with the document you are commenting on.

This form has two parts –

Part A – Personal Details: only needs to be completed once.

Part B – Your representation(s).

Part A

	*1. Personal Details**	2. Agent's Details (if applicable)
Title	Mrs	
First Name	[redacted]	

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Last Name	[redacted]	
Job Title *(where relevant)*	Planner	
Organisation *(where relevant)*	The Canal & River Trust	
Address Line 1	National Waterways Museum	
Line 2	The Docks	
Line 3	Gloucester	
Line 4		
Post Code	GL1 2EH	
Telephone Number	[redacted]	
Email Address *(where relevant)*	Jane.hennell@canalrivertrust.org.uk	

I consent to my details being used for the purposes set out on page 1 of this form under **'How we will use your details'**

x	**Yes**		**No**

Part B –

1. Are you a resident of Wychavon, Malvern or Worcester?

	Yes, I live in Wychavon
	Yes, I live in Malvern Hills District
	Yes, I live in Worcester
x	No

2. Are you a representative of a business or other organisation?

	Business
x	Organisation
	Individual

If you are part of a business or organisation please provide the name:

The Canal & River Trust

3. Do you agree that the CIL charging schedule is in line with the CIL regulations and is therefore legally compliant?

x	**Yes**		**No**

4. Do you have any comments on the content of the viability evidence base documents?

No

(Continue on a separate sheet /expand box if necessary)

5. Do the proposed charges adequately reflect the conclusions of the CIL viability evidence?

x	**Yes**		**No**

Please provide reason for your response here:

(Continue on a separate sheet /expand box if necessary)

6. Do you have any comments on the proposed CIL rates?

No

(Continue on a separate sheet /expand box if necessary)

7. Do you have any further comments to make?

Draft Community Infrastructure Levy (CIL) Charging Schedule

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Trust have reviewed the document and based on the information available we have no further comment to make.

(Continue on a separate sheet /expand box if necessary)

8. Would you like to be notified of the submission of the CIL Draft Charging Schedule?

x	**Yes**		**No**

9. Would you like to be notified of the receipt of the examiner's report?

x **Yes**	**No**

10. Would you like to be notified of the approval of the Charging Schedule?

x **Yes**	**No**

11. Do you wish to speak at examination?

Yes	x **No**

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Date comments made:

23/02/2026

Historic England

SWDP Team
Planning Policy, The Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT

Direct Dial: [redacted]

Our ref: PL00801177

26 February 2026

Dear Project team,

RE: SOUTH WORCESTERSHIRE COUNCILS DRAFT COMMUNITY INFRASTRUCTURE LEVY (CIL) - Draft Charging Schedule (2026) CONSULTATION

Thank you for the opportunity to engage with the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is taken into account at all stages and levels of the local planning process.

Advice

In terms of our remit for the historic environment we note that there is no mention of the historic environment within the document.

S106 contribution information

We acknowledge that historic environment related matters would most likely be addressed through S106 contributions but we are also aware that the matter is not included in the S106 list included at Paragraph 4.3. Would the Councils' intention be that the matter be encompassed in the 'site specific mitigation' element of the list? Any clarification on this within the document, or a specific historic environment/heritage asset criterion on the list would be welcomed.

CIL Charging maps and rates information

Historic England has no comments to make on the information set out for these aspects.

CIL exemption information

Historic England welcomes the section on CIL exemption including Paragraph 9.5 which relates to discretionary relief since there could be circumstances where the viability of a scheme designed to secure the reuse and long term viability of a heritage asset is compromised by the requirement for CIL payments.

Historic England

Vacant or underused heritage assets not only fail to make a full contribution to the local economy but they can also give rise to negative perceptions about an area which, in turn, can detract from its attractiveness to inward investment. Consequently, in setting thresholds there needs to be a clear understanding of the potential impact which CIL could have on investment in, and regeneration of, historic areas - particularly those which have been identified as being ‘at risk’. The proposed draft document would offer opportunity for such matters arising to be addressed through the CIL exemption process.

I hope that this information is of use to you at this time. Please do not hesitate to get in touch if you have any questions on the above.

Yours sincerely,

[redacted]

Team Leader (Development Advice)

[redacted]

THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

WYCHAVON DISTRICT COUNCIL good services, good value | Worcester CITY COUNCIL | Malvern Hills District Council www.malvernhills.gov.uk

South Worcestershire Councils
Community Infrastructure Levy
Draft Charging Schedule Consultation

Please return by **12:00pm on Monday 02 March 2026 to:**
South Worcestershire Development Plan Team
Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT
or email swdp@worcester.gov.uk

Ref:

(For official use only)

How we will use your details

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This form has two parts –

Part A – Personal Details: only needs to be completed once.

Part B – Your representation(s).

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
Title	Mr	
First Name	[redacted]	

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Last Name	[redacted]	
Job Title (where relevant)	Principal Planning Officer	
Organisation (where relevant)	Herefordshire Council	
Address Line 1	Plough Lane Offices	
Line 2	Plough Lane	
Line 3	Hereford	
Line 4		
Post Code	HR4 0LE	
Telephone Number	[redacted]	
Email Address (where relevant)	[redacted]	

I consent to my details being used for the purposes set out on page 1 of this form under **'How we will use your details'**

X	**Yes**		**No**

Part B –

1. Are you a resident of Wychavon, Malvern or Worcester?

	Yes, I live in Wychavon
	Yes, I live in Malvern Hills District
	Yes, I live in Worcester
X	No

2. Are you a representative of a business or other organisation?

	Business
X	Organisation
	Individual

If you are part of a business or organisation please provide the name:

Herefordshire Council (Strategic and Neighbourhood Planning Team)

3. Do you agree that the CIL charging schedule is in line with the CIL regulations and is therefore legally compliant?

X	**Yes**		**No**

4. Do you have any comments on the content of the viability evidence base documents?

N/A

(Continue on a separate sheet /expand box if necessary)

5. Do the proposed charges adequately reflect the conclusions of the CIL viability evidence?

X	**Yes**		**No**

Please provide reason for your response here:

N/A

(Continue on a separate sheet /expand box if necessary)

6. Do you have any comments on the proposed CIL rates?

N/A

(Continue on a separate sheet /expand box if necessary)

7. Do you have any further comments to make?

Herefordshire Council does not have any comments, concerns or objections to the draft CIL charging schedule. We acknowledge and thank you for the invitation to respond to this consultation and look forward to continuing to work with our neighbouring authorities on cross-boundary and strategic planning matters. (Continue on a separate sheet /expand box if necessary)

8. Would you like to be notified of the submission of the CIL Draft Charging Schedule?

X **Yes** **No**

9. Would you like to be notified of the receipt of the examiner's report?

X **Yes** **No**

10. Would you like to be notified of the approval of the Charging Schedule?

X **Yes**

No

11. Do you wish to speak at examination?

Yes

X **No**

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Date comments made:

02/03/2026

Whittington Parish Council

One Parish : One Community

Response to the Draft Community Infrastructure Levy (CIL) Charging Schedule Consultation 2026

Accessibility of the Consultation Documents

The consultation document is highly technical and difficult for a layperson to understand. It relies heavily on jargon and acronyms, many of which are not clearly explained. Parish councils are largely run by volunteers without specialist planning expertise. Consultation materials should therefore be accessible and clearly explain how the proposals affect local communities.

The document would have benefited from a plain-English summary and practical examples showing how CIL will operate. Without these, it is difficult for parish councillors to confidently identify the key implications of the policy and represent their communities effectively.

Disadvantage to Parish Councils Without a Neighbourhood Plan

The proposed arrangements appear to significantly disadvantage parish councils without a Neighbourhood Development Plan, as parishes with an NDP receive 25% of CIL, whereas those without receive just 15%. Many smaller parish councils do not have the resources or capacity to prepare a neighbourhood plan (at least a two-year commitment). No advance notice appears to have been given that the introduction of CIL would create this disparity in funding.

Consideration should therefore be given to transitional arrangements, additional support for neighbourhood planning, or mechanisms to ensure that parishes most affected by development are not disadvantaged.

It is patently unfair that Whittington, one of the parishes most impacted by the Wychavon Town proposals will receive far less CIL funding than other parishes with more modest impacts.

Allocation and management of CIL Funding

Greater clarity is required regarding how CIL funds will be allocated and managed. In particular:

- How will the South Worcestershire councils ensure that CIL generated by development is spent on infrastructure related to the communities affected by that development?
- Can other areas or authorities access CIL funding generated locally?
- How will decisions be made about which projects are prioritised?
- When do developer contributions actually become available?
- How and when can parish councils apply for funding?
- Who decides which projects are funded and when?

For communities directly affected by development, it is important that funding generated locally is used to mitigate local impacts. A clear and simple guide explaining the process for parish councils would be very helpful.

In relation to Whittington parish specifically, CIL funding should therefore support local measures such as green buffers between residential areas (Pershore Road) and new commercial development, as well as community green space and recreational facilities.

Infrastructure Delivery and Consistency
There appear to be inconsistencies between different consultation materials. For example, references to early delivery of the proposed Boulevard appear to conflict with other consultation information suggesting development of the Pershore Road area may not occur for many years.

The supporting 'Worcestershire Parkway Infrastructure Delivery Plan 2024' also identifies significant infrastructure constraints, including limited water management capacity that must be addressed before development begins. However, there is currently little detail on how this infrastructure will be delivered.

Conclusion
While the principle of using CIL to fund infrastructure is supported, the current consultation raises several concerns regarding accessibility, fairness for parish councils, transparency and the clarity of infrastructure delivery plans. Whittington Parish Council would urge stronger safeguards to be put in place for existing local communities and to strengthen the allocations made to parishes most affected by development.

Community Infrastructure Levy (CIL) Draft
Charging Schedule Consultation 2026

South Worcestershire Development Plan
Civic Centre,
Queen Elizabeth Drive,
Pershore, WR10 1PT

9th March 2026

Dear SWDP Team,

CIL Draft Charging Schedule Consultation 2026
Worcestershire County Council (WCC) has considered the proposal to increase the Community Infrastructure Levy (CIL) charging schedule and its future governance. Having reviewed the evidence presented, WCC make the following comments to ensure development and the required infrastructure is brought forward according to the emerging South Worcestershire Development Plan Review (SWDPr). These comments are produced by officers and endorsed by the Cabinet Member with Responsibility for Business and Skills.

The current charging schedule was introduced in 2017 by the South Worcestershire Councils (SWC) to deliver the South Worcestershire Development Plan (SWDP). WCC recognises and welcomes the need for a review of the evidence behind the charging schedule.

With the SWDPr nearing adoption WCC consider it important to reiterate its position of not being able to forward fund the infrastructure required in the Infrastructure Delivery Plan to mitigate the impact of development. Timely Section 106 (S106) contributions are, therefore, critical to ensuring the delivery of the required infrastructure to support development.

The current CIL charging schedule has thus far not contributed or proposed to contribute any infrastructure funding for matters which the County Council has responsibility (such as education facilities), required to mitigate the impact of new development. The allocation of CIL funds has been subject to discussion between WCC and South Worcestershire officers and it is our understanding that WCC's infrastructure requirements (transport and education) will not be prioritised for CIL distribution.

It is noted that there are no proposals set out in this current consultation to consider

[redacted]
Head of Planning and
Transport Planning
County Hall
Spetchley Road
Worcester
WR5 2NP

how CIL funding will be distributed in the future. This consultation directs the reader to the Infrastructure Funding Statements for information on the spending of CIL contributions. Potential uses for CIL stated in the Infrastructure Funding Statements are:

- Improvements to the Public Realm and Environment of Evesham Town Centre (Wychavon).
- Areas of Informal Recreation (Malvern).
- Worcester City Play Plan (Worcester City)

It is helpful to understand potential projects CIL could be spent on. However, WCC consider the CIL charging schedule must help fund a wider variety of infrastructure projects required to make development acceptable across the adopted SWDP and the SWDPr, and to aid the delivery of projects in the Infrastructure Delivery Plan. Funding infrastructure required to make the plan deliverable / mitigate the direct impact of development should be the primary use of all infrastructure contributions. The proposal to solely allocate funds to the three specific matters reduces the funding of essential infrastructure which for WCC is focused on education provision, and transport improvements.

The consultation does not propose that any of WCC primary responsibilities will be funded through CIL but will solely be funded through S106 contributions. WCC are concerned as to whether the required funding for infrastructure will be available, with the resulting risk to infrastructure delivery. This will be explored further below.

Paragraph 4.3 of the consultation document suggests S106 will be primarily used to fund:

- Affordable Housing
- Education
- Green Infrastructure including Areas of Informal Recreation
- Malvern Hills SSSI Mitigation Strategy
- National Landscape Impact
- Health (Primary and Secondary)
- Waste
- New Community Facilities
- Transport
- Police
- Flood and Water management; and
- Site specific mitigation.

This list is extensive and covers most of the items in the Infrastructure Delivery Plan and the most significant infrastructure items required to mitigate the impact of development. Given the length of the list at paragraph 4.3 WCC do query why the proposed topics for CIL spend is so restrained. WCC suggest this is reviewed and CIL topics expanded to include the themes covered in para 4.3.

Strategic sites[1] (known as strategic growth areas) have a significant impact both on-site and, directly related off-site infrastructure needs. WCC concurs with the consultation that there will be a requirement for these sites to be funded entirely by S106 contributions (exempt from CIL, for clarity). These on and off-site requirements are critical to the success of such large-scale sites.

WCC suggest the approach to strategic sites should be utilised on windfall sites of 500 dwellings or more as the S106 value tested will be insufficient to fund the required infrastructure.

WCC considers that current and future CIL receipts should be used to ensure the infrastructure identified and evidenced in the current / most up to date Infrastructure Delivery Plans (IDP) is delivered to mitigate the impact of the collective impact of development sites and proposed overall growth.

If WCC is only able to access S106 developer contributions, this may give rise to shortfalls in funding secured from developments to mitigate their impact. Further, CIL has priority for payment over S106, potentially creating more viability issues for S106 requests, and calculations for S106 appear not to be sufficient to deliver the required infrastructure, as is evidenced below. These matters combined mean it may not be possible to deliver the proposed infrastructure within the IDP.

As a statutory consultee, WCC must ensure that infrastructure is funded which is required directly as a result of development to mitigate the impact of the development is appropriately funded by this development. If developer contributions are not available, WCC will have to consider this as part of its response to planning applications, including potential objections.

The values tested within the CIL Viability Study (2022) and the CIL Viability Report (December 2025) for S106 do not appear to be sufficient to support the required infrastructure WCC is responsible for. . These concerns are set out in more detail below:

[1] Strategic Growth Areas in SWDP currently identified as South Worcester Urban Extension, West Worcester Urban Extension, Wychavon Town, Throckmorton, Rushwick and Mitton.

- The site sizes (dwelling numbers) used across the greenfield and brownfield value differ which doesn't allow a direct comparison. More importantly, the value of S106 contributions given also significantly vary and do not match WCC calculations and observation as to the likely level of S106 contribution required. This is illustrated in table 1 and 2 below in the "Total Average S106 Request Per Dwelling".

- The values allowed for S106 also varies between site size on greenfield and brownfield development without explanation . The values used should be related to the likely infrastructure cost requirement for to make development acceptable. Row 4 in tables 1 and 2 shows the average cost per dwelling WCC would require ensuring development is mitigated for.

- WCC have collated evidence showing average values of contributions requested by WCC, the district councils and primary healthcare below. For this and the previous consultation (response dated 25th March 2024), WCC have assessed the levels of Section 106 funding required.. From the figures set out in table 1, the S106 values allocated in row 2 appear to be below those likely to be required. This is illustrated by showing a risk rating of red, amber, green in row 6 for the amount of funding available for each scale of development, where green is sufficient funding available and red showing sufficient funding is not available.

WCC therefore concludes the values for S106 used for both greenfield and brownfield sites are not sufficient to meet the requirements for infrastrcutre and that the funding available is unlikely to the sufficient. .

Based on average requests WCC make (see table 1 below, row 3) for development sites, evidence suggests insufficient funding for the average S106 requests for sites of 500 or more dwellings for greenfield sites. Sites of 500 dwellings or above are more likely to require be on site infrastructure such as a school, sustainable transport improvements and / or significant highways improvements.

In addition to the evidence presented below, should the NHS Acute Trust, Police or other infrastructure providers be added to the value requested as S106 contributions, there will be an insufficient buffer for all site sizes on greenfield sites. WCC would recommend the buffer (total difference) shown in row 6 of table 1 needs to be increased for amber and red sites to ensure infrastructure required can be delivered. This is based on:

- The current proposed funding split between section 106 and CIL

- The likelihood of additional infrastructure providers requesting S106.

In making this recommendation we are also aware of the lack of five-year housing land supply of the south Worcestershire councils and the need for immediate review of the local plan upon adoption. This will bring increased windfall applications which in turn is likely to bring further infrastructure needs, which are currently not reflected in Infrastructure Delivery Plans. .

For Brownfield sites, WCC agrees with the proposed charging schedule and viability assessment. The evidence for this is presented below in table 2 row 6, which shows there is sufficient buffer between £7,239 and £17,704 per dwelling.

Table 1 Section 106 Values by Site in CIL Viability Study 2022 and 2025 for Greenfield Sites

	Site Size no of Dwellings	**7**	**10**	**30**	**50**	**80**	**100**	**200**	**300**	**400**	**500**	**700**
1	CIL Charge per m2 (information only)	£120	£54.70	£54.70	£120	£120	£120	£120	£120	£120	£120	£120
2	2025 Greenfield S106 Value Tested Per Dwelling	£7,936	£27,660	£25,499	£27,354	£28,803	£30,843	£25,523	£27,194	£27,194	£27,194	£30,632
3	Average Total WCC Request Per Dwelling	£2,486	£16,268	£15,999	£18,806	£18,423	£18,399	£18,392	£18,313	£18,500	£25,762	£25,939
4	Average District and other Providers Request[2] Per Dwelling[3]	£2904	£2904	£2904	£2904	£2904	£2904	£2904	£2904	£2904	£2904	£2904
5	Total Average S106 Request Per Dwelling	£5,398	£19,182	£18,933	£21,760	£21,407	£21,404	£21,497	£21,517	£21,754	£29,166	£29,544
6	**Total Difference**	**£2538**	**£8478**	**£6566**	**£5594**	**£7396**	**£9439**	**£4026**	**£5676**	**£5440**	**-£1972**	**£1088**

[2] Based on an average of 5 completed S106 agreements during last four years.

[3] Other providers currently only consist of NHS Primary Trust (GP Services).

Table 2 Section 106 Values by Site in CIL Viability Study 2022 and 2025 for Brownfield Sites

	Site Size no of Dwellings	**8**	**10**	**30**	**50**	**100**	**300**	**500**
1	CIL Charge per m2 (information only)	**£120**	**£0**	**£0**	**£0**	**£0**	**£0**	**£0**
2	Brownfield Higher S106 Value 2022 & 2025 Tested Per Dwelling	£15,297	£36,637	£36,637	£36,405	£36,405	£36,405	£36,405
3	Average Total WCC Request Per Dwelling	£2,443	£16,268	£15,999	£18,806	£18,399	£18,313	£25,762
4	Average District and other Providers Request Per Dwelling	£2904	£2904	£2904	£2904	£2904	£2904	£2904
5	Total Average S106 Request Per Dwelling	£5,355	£19,182	£18,933	£21,760	£21,404	£21,517	£29,166
6	**Total Difference**	**£9,942**	**£17,455**	**£17,704**	**£14,645**	**£15,001**	**£14,888**	**£7,239**

worcestershire
countycouncil

WCC recognises S106 as our main source of developer contributions for education and transport. However, WCC also has responsibility for other matters which includes waste disposal, public health, broadband and telecoms. Some of these matters could benefit from CIL funding to improve communities with development growth including rural areas and built up urban / suburban areas of high demand. WCC would like to see wider community benefit projects that these infrastructure themes could deliver as potential recipients of CIL funding.

In conclusion, we do not support the proposals outlined in this consultation because of the potential detrimental impact of our ability to fund and deliver infrastructure required to mitigate plan proposals.

We look forward to working with you further and to exploring solutions to the issues we have identified.

Yours sincerely

[redacted]

[redacted]
Head of Planning and Transport Planning

South Worcestershire Councils
Community Infrastructure Levy
Draft Charging Schedule Consultation

Please return by **12:00pm on Monday 02 March 2026 to:**
South Worcestershire Development Plan Team
Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT
or email swdp@worcester.gov.uk

Ref:

(For official use only)

How we will use your details

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation 2018. Please note that your name and comments may be made publicly available when displaying and reporting the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the council's website, but the original representations with personal details redacted will be available in full for inspection on request. Your details will be retained in order for us to validate your comments. We will use these details to continue to notify you of the progress on planning policy documents within south Worcestershire. If you no longer wish to receive notifications you can e-mail us or write to us to be removed from the consultation list however this will impact upon your right to be notified of progress with the document you are commenting on.

This form has two parts –

Part A – Personal Details: only needs to be completed once.

Part B – Your representation(s).

Part A

*1. Personal Details**		*2. Agent's Details (if applicable)*
Title	Mr	Mr
First Name	[redacted]	[redacted]

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Last Name	[redacted]	
Job Title *(where relevant)*		Senior Director - Economics
Organisation *(where relevant)*	Johnson Brothers	Pegasus Group
Address Line 1		22 Ganton Street
Line 2		London
Line 3		
Line 4		
Post Code		W1F 7BU
Telephone Number		[redacted]
Email Address *(where relevant)*		[redacted]

I consent to my details being used for the purposes set out on page 1 of this form under **'How we will use your details'**

X	**Yes**		**No**

Part B –

1. Are you a resident of Wychavon, Malvern or Worcester?

	Yes, I live in Wychavon
	Yes, I live in Malvern Hills District
	Yes, I live in Worcester
X	No

2. Are you a representative of a business or other organisation?

X	Business
	Organisation
	Individual

If you are part of a business or organisation please provide the name:

Johnson Brothers, owners of Two Shires Park

3. Do you agree that the CIL charging schedule is in line with the CIL regulations and is therefore legally compliant?

Yes	X **No**

4. Do you have any comments on the content of the viability evidence base documents?

Please refer to responses under question 5 below which address both the inputs and outputs of the viability study.

5. Do the proposed charges adequately reflect the conclusions of the CIL viability evidence?

	Yes	X	No

Please provide reason for your response here:

General Issues

These representations are made on behalf of Johnson Brothers, the owner of Two Shires Park, Weston Road, Honeybourne, an employment allocation of approximately 31.22 ha (c.13.95ha developable), identified for retention and redevelopment for employment uses in the South Worcestershire Development Plan Review (allocation WYPE13 – Two Shires Park, Weston Road).

Two Shires Park is the largest allocation within Table 36 of the draft plan, representing c.40% of total allocated land within the table. As indicated within PPG (Paragraph: 026 Reference ID: 25-026-20190901), larger sites should be assessed separately and a specific CIL rate considered. Two Shires Park is also unusual in that it is a relatively large employment site, but located some distance from motorways and typically attracting small / medium businesses. At present it does not appear that any assessment of Two Shires Park specifically or a typology representing this site type / location has been undertaken.

Proposed Changes - A specific viability assessment of WYPE13 should be undertaken and / or additional typologies prepared to reflect this site type / location. Engagement with the landowner on the results of this should take place.

The site's scale, location and employment function mean that its deliverability is highly sensitive to cumulative development costs, such as CIL. Specific comments related to the Council's viability evidence provided are presented below.

Commercial Rents and Values

What the Draft CIL evidence says (CIL Viability Report): The Viability Report adopts generalised industrial and logistics rental assumptions across South Worcestershire market zones, derived from secondary market evidence rather than site-specific performance.

Comment: Evidence submitted previously to the Council as part of the SWDP review confirms that, whilst it is an important home to many local businesses, Two Shires Park is limited by its location and caters to small and medium size firms who are only able to afford lower rents. Whilst important to the local economy, these local businesses inherently also have weaker covenant strength and therefore support weaker yields when assessing the value of the asset. As noted within the previously submitted evidence, Two Shires Park has supported many local business to grow and go onto national success, however these businesses move to better situated locations when they succeed, meaning that Two Shires continues as a home for smaller and start up firms.

Two Shires Park is also located in a rural fringe employment market, distinct from motorway-adjacent logistics locations such as Worcester, Droitwich or Pershore. Whilst the 6.5% yield for light industrial, 5.5% yield for medium / large industrial and 5% for logistics may be achievable for some ideally located developments, it is unrealistic for developments in weaker locations with poor transport connections for larger vehicles and which attract occupants with lower covenant strength.

The rents adopted by the CIL study (£9-14/ft2) are also far in excess of those achievable at secondary locations such as Two Shires Park. As can be verified by business rates data, occupiers at the Park currently pay around £3-4/ft2, with £4-5/ft2 possible for newly refurbished / extended space.

In addition, the Viability Report does not clearly demonstrate how voids, incentives such as contributions to fit-out works (beyond rent-free periods for Medium / Industrial), or phased absorption have been reflected in the appraisals. These are significant for commercial development and must be included.

Proposed Changes – Allowance should be made for realistic void periods (6 months for the smaller units typical at Two Shires), rent free & incentive packages (12 months rent free equivalent), rents (c.£5-7/ft2) and yields (8.0% for secondary locations such as Two Shires Park).

Commercial Build Costs

What the Draft CIL evidence says (CIL Viability Report): Table 6.5 – Commercial Cost Assumptions

- £914 psm for light industrial (median BCIS for warehouses up to 2000 sqm GFA – rebased to Worcestershire Q3 2025)
- £738 psm for medium to large industrial units and logistics (median BCIS for warehouses over 2000 sqm GFA – rebased to Worcestershire Q3 2025)

Comment: The Viability Report relies primarily on BCIS median build cost data, with limited uplift for abnormal costs. This approach does not adequately reflect:

- Servicing and infrastructure costs associated with large employment allocations (internal roads, drainage, utilities reinforcement).
- Net zero and climate adaptation requirements embedded within the SWDP Review, including EV infrastructure and green infrastructure provision, which have direct cost implications.

- Recent construction cost inflation / energy and materials price increases, which remain volatile and disproportionately affect industrial and infrastructure-heavy development typologies.

Whilst the adopted build costs may be sufficient to meet minimum standards, this will not meet the needs of most occupiers. Current demand, even from small firms, is typically for higher quality, more sustainable facilities with lower energy costs and these standards are essential to achieve the values anticipated within the study.

As recognised in national guidance, viability testing should reflect the full cost of policy compliance, not just headline build costs.

Proposed Changes – Build costs should be increased by c.£50-£75/m2 or assumed rental values reduced if the standards expected by occupiers are not incorporated within the build costs.

Commercial Costs – External Works

What the Draft CIL evidence says (CIL Viability Report): Table 6.5 – Commercial Cost Assumptions

- External Works (15%) - This externals allowance includes generic 'on-plot' costs including inter alia: access, roads, parking, loading, landscaping, utilities, drainage etc.

Comment: An allowance of 15% for external works is included. Whilst this may be appropriate for general external works, it does not allow for the site infrastructure and servicing required for industrial and logistics development. As recognised in national guidance, viability testing should reflect the full cost of policy compliance, not just headline build costs.

Proposed Changes – Build costs for site servicing and infrastructure should be separately allowed in addition to external works. For a scheme of the type of Two Shires Park these are likely to amount to c.£150,000 per acre.

Commercial Developer Return

What the Draft CIL evidence says (CIL Viability Report): We have included a profit margin of 15% on cost for the commercial typologies. Commercial developers tend to operate on a profit on costs (rather than house-builders which operate on a margin on turnover).

Comment: Viability of development is currently extremely challenging and set against a backdrop of a weak national economic picture and deteriorating global conditions. The current challenges are not anticipated to change quickly; development therefore remains challenging and risk levels enhanced. The cost of capital is linked to risk and bank base rates which also remain elevated. Delivery of schemes will only happen where a capital can be attracted via a reasonable risk adjusted return, reflecting current circumstances.

Proposed changes: The developer return should be based on development value and increased to 20%.

Benchmark Land Value – Brownfield

What the Draft CIL evidence says (CIL Viability Report): Table 7.1 – South Worcestershire Councils BLV Assumptions, June 2025

- £350k/acre Brownfield Site Brownfield - District Wide plus a 14% premium

Comment: The indicated premium of 14% is unlikely to provide sufficient incentive to incur the disruption and cost of ceasing an existing use and will therefore represent a barrier to the supply of development land.

Proposed changes: The premium should be increased to 25%, this being the middle of the typical 20-30% range which is necessary to release land for redevelopment.

Sensitivity testing

What the Draft CIL evidence says (CIL Viability Report): Aspinall Verdi have also prepared a series of sensitivity scenarios on the maximum CIL rate for each typology and a range of assumptions. These include:

- Table 1 – CIL v Affordable Housing % on site (only for residential typologies)
- Table 2 - CIL v S106 Contributions
- Table 3 – CIL v Profit
- Table 4 – CIL v BLV
- Table 5 – CIL v Density
- Table 6 – CIL v Build Cost
- Table 7 – CIL v Market Values
- Table 8 – CIL v Grant.

Comment: While the Viability Report includes high-level sensitivity testing, there is limited employment-specific sensitivity analysis showing the impact of:

- Market facing cost of capital / profit levels
- Significantly lower rental values
- Higher infrastructure costs
- Slower delivery trajectories
- Combined CIL and Section 106 obligations.

This is a notable omission given that large employment sites are explicitly identified as new contributors under the Draft Charging Schedule, where previously they paid no levy. Without robust downside sensitivity testing, it is not possible to conclude that the proposed rates would not threaten the delivery of employment land.

Proposed changes: The proposed CIL rates should be informed by appropriate sensitivity testing as set out above.

6. Do you have any comments on the proposed CIL rates?

Employment Allocations and Commercial CIL

The South Worcestershire Development Plan Review identifies Two Shires Park as a key contributor to employment land supply, supporting economic growth and job creation over the plan period.

In its current form, the viability evidence underpinning the Draft Charging Schedule under-states development costs, over-states revenues and does not properly account for risk. There is also a failure to specifically assess Two Shires Park or any typology representing similar secondary employment locations housing SMEs. The current "one size fits all" approach does not offer the typology and locational variation supported by PPG and as such is not sound or reflective of the evidence. Without change, there is a clear risk that the proposed CIL rates will undermine the delivery of allocated employment land and Two Shires Park in particular, contrary to national policy, Planning Practice Guidance and the Council's own development plan objectives.

Proposed changes: The Council should either:

- Adopt a nil CIL rating for Two Shires Park.
- Adopt a nil CIL rating for industrial / logistics uses outside of specific prime locations where rents / yields / occupier demand may be able to support this.
- Adopt a nil CIL rating for industrial / logistics uses in general.

7. Do you have any further comments to make?

(Continue on a separate sheet /expand box if necessary)

8. Would you like to be notified of the submission of the CIL Draft Charging Schedule?

X **Yes**

No

9. Would you like to be notified of the receipt of the examiner's report?

X **Yes**

No

10. Would you like to be notified of the approval of the Charging Schedule?

X	**Yes**		**No**

11. Do you wish to speak at examination?

X	**Yes**		**No**

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Date comments made:

13/3/26

SOUTH WORCESTERSHIRE

Community Infrastructure Levy Revised Charging Schedule

March 2026

INTRODUCTION

1. The representations have been prepared on behalf of Bloor Homes Western.
2. Bloor Homes is the country's largest privately owned housebuilder. It has a well-established reputation in the Western region with a strong track record of delivering well-regarded and high-quality new developments of scale throughout South Worcestershire: namely in Worcester, Malvern Hills and Wychavon. It has developed excellent working relationships with senior local authority planning officers (both Policy and Development Management) including at Worcestershire County Council in their role as local highway authority and the local education authority.
3. As examples, Bloor have been delivering the initial phases of up to 1,400 new homes and supporting infrastructure at Temple Laugherne (a strategic allocation in the South Worcestershire Development Plan (SWDP)) for over 5 years and recently secured planning permission for smaller scale schemes at Badsey in Wychavon and Great Witley in Malvern Hills District. Bloor are also delivering over 500 new homes at Cheltenham Road, Evesham (also an allocation in the SWDP).
4. It is acknowledged that South Worcestershire Councils (SWC) have operated its Community Infrastructure Levy (CIL) since 2017; this was justified through the Examination process previously.
5. Presently the SWCs are proposing to revise its CIL Charging Schedule. Amongst these changes is a proposal to increase the levy on new housing from either £43.27sqm or £54.70sqm to £120.00sqm (Housing Greenfield); an increase of at least 119%. This is a <u>substantial increase</u>.

BACKGROUND

6. Before examining the proposed changes to the Charging Schedule, it is worth looking back to 2017 when the charge was first introduced. At that time the Levy was considered to be the primary mechanism for contributions towards infrastructure to be collected and pooled by the Councils. Section 106 obligations were expected to reduce.
7. The rate at which the levy was set was therefore relevant as it represented the principal means to help fund infrastructure needed to deliver growth set out in the SWDP.
8. By now of course the restrictions on use of S106 have evolved and extensive lists of planning obligations are sought alongside the CIL levy. While a developer may not necessarily be paying twice for infrastructure via this combination of CIL and planning obligations, they are paying more than would have been the case under principally the levy.
9. In this context, it is instructive to contrast development requirements between the 2016 – 2030 SWDP and the current SWDP Review (SWDPR). Both the scale of housing and employment are broadly similar over the respective plan periods. Instinctively, the scale of infrastructure requirements are unlikely to be over twice what they were previously.

CALCULATING CIL

10. Whilst the Aspinall Verdi Viability Assessment purports to justify that this scale of increase would not harm the viability of future development, and hence is justifiable, that omits a fundamental step in the process.

11. CIL is referred to *"an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area"* [1]. In this context, the Planning Practice Guidance, explains that:

    "*when deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments";*

12. In these terms, CIL is not a levy calculated simply by reference to what can be afforded; that is nothing other than local taxation. Yet this is the approach that appears to underpin the current draft charging schedule, described by AV as "back solving the maximum CIL" and applying an *"appropriate buffer".*

13. That is one side of the calculation, but it must always be undertaken alongside an understanding and explanation of the additional investment required to support development across the area. The NPPG states *"in meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area".*

14. Such information is absent from the current consultation. No documents have been published that enable any appreciation or understanding of the funding gap that CIL receipts are intended to contribute towards. Equally there is no information as to how the levy would in practice relate to the implementation of the infrastructure to support new development.

15. The closest the consultation documents get to such an explanation it at para 3.4: *"CIL will improve the SWC's ability to mitigate the cumulative impacts on infrastructure".* Paragraph 3.10 asserts that *"the Draft Charging Schedule illustrates that an appropriate balance between funding infrastructure and economic viability has been sought".* We disagree.

16. EXAM40, the Infrastructure Delivery Plan, which is relied upon, is neither complete nor up to date. It does not include any conclusions as regard a funding gap. Chapter 19 therein, which is referred to as providing that information, simply is not present.

17. Moreover, EXAM40, is based in part on the proposed allocation at Throckmorton, current at the time the IDP was being conceived, and which gave rise to particular strategic infrastructure requirements. Throckmorton has since been deleted from the SWDP via the January 2026 Main Modifications. The extent to which that scheme was influencing strategic infrastructure requirements plan-wide is simply not apparent.

18. The absence of this contextual background within or since EXAM40 is a fundamental flaw.

19. This is compounded by the Aspinall Verdi Report which plainly identifies the purpose of the levy is to facilitate the provision of <u>necessary strategic transport infrastructure</u> required to address the cumulative and cross boundary impacts of the Local Plan and to enable sustainable development to be brought forward in South Worcestershire (para 1.3). It is not clear whether these two notions are combined or separate. But either way, there is nothing in EXAM40 or EXAM39 that indicates the scale of a funding gap that requires redress.

20. It is notable that the Councils propose to "zero rate" Worcestershire Parkway (and other strategic sites), which gives rise to extensive transport and infrastructure implications. Importantly Criterion M of Policy SWDP55 lists the transport infrastructure that is <u>necessary</u> for the delivery of that new community.

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1 *NPPG Paragraph: 010 Reference ID: 25-010-20190901 refers*

21. On this basis, those elements of infrastructure for Worcestershire Parkway (now named Wychavon Town) should be provided by means of the S106 planning obligation (or Section 278 agreement). In other words, such infrastructure is expected to be directly funded by that proposed development.

22. Conversely there is no reference within the EXAM39 to CIL as a source of funding for the New Community.

INFRASTRUCTURE TO BE FUNDED

23. Any local authority that has received developer contributions is required to publish an Infrastructure Funding Statement at least annually[2]. An Infrastructure Funding Statement must report on the infrastructure projects or types of infrastructure that the authority intends to fund wholly or partly by the levy (excluding the neighbourhood portion)[3].

24. Nothing in the current constituent Infrastructure Funding Statements shed any meaningful light on how CIL monies would be used in the terms described by the consultation document, Aspinall Verdi, or in any other terms.

25. Notably only two initiatives are referred to (Areas of Informal Recreation in Malvern Hills and the Worcester City Play Plan); whilst Wychavon have retained CIL monies for administrative purposes.

26. It is against this backdrop that the notion of the above identified 119% increase in the CIL charging rate must be considered. No justification for this scale of increase is presented. Notwithstanding that Aspinall Verdi imply this is fair and reasonable, it represents a significant uplift from the current CIL absent any assessment of, or association with, infrastructure requirements.

27. The consultation document indicates what infrastructure they "expect" to be funded by planning obligations (para 4.3).

    Affordable Housing;

    Education;

    Green Infrastructure including Areas of Informal Recreation;

    Malvern Hills SSSI Mitigation Strategy;

    National Landscape Impact;

    Health (Primary and Secondary);

    Waste;

    New Community Facilities;

    Transport;

    Police;

    Flood and Water management; and

    Site specific mitigation.

28. This is an extensive list. Indeed, it is difficult to conceive of other infrastructure types that would not fall into these categories, especially now that pooling restrictions no longer apply.

29. Seen through this lens, the spectre of local taxation is again apparent.

VIABILITY ASSUMPTIONS

30. A report prepared by Bruton Knowles has been appended (Appendix 1), which identifies how AV's assumptions on values, costs and development typologies overstate viability and underestimate real-

2 *NPPG Paragraph 174 Reference ID: 25-174-20190901*

3 *Paragraph 176 Reference ID: 25-176-20190901*

world development risks and costs. It concludes that there are several areas that the Report is flawed and/or requires further clarification, namely:

(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.

CONCLUSIONS

31. The proposed CIL Charging Schedule proposes a substantial increase over twice the rates set in 2017. However, the justification for this level of uplift is not adequately evidenced. The Aspinall Verdi report is based on appears to "back-solving" the maximum CIL rate but without any apparent evidence of the scale of the funding gap that might exist.

32. Taken together, the lack of clear justification for increasing the CIL rate, combined with the substantive methodological shortcomings identified by Bruton Knowles, means that the evidence base does not currently provide a sound or reliable foundation for the proposed Charging Schedule. Further work is required to reassess viability inputs, properly reflect development costs and risks, and clearly define the infrastructure funding gap before any uplift to CIL can be justified.

Appendix 1: Bruton Knowles Response to Aspinall Verdi CIL Viability Report

South Worcestershire Development Plan Review (SWDPR)

Response to Aspinall Verdi CIL Viability Report (December 2025)

Prepared on behalf of Bloor Homes

March 2026

1 Introduction

1.1 This report has been prepared for submission in conjunction with other representations prepared by Bloor Homes and its consultants in response to the South Worcestershire Council draft Community Infrastructure Levy Revised Charging Schedule and associated Aspinall Verdi CIL Viability Report – December 2025 (the "Report").

1.2 This report has been prepared by Mr Robert Anthony MRICS of Bruton Knowles, on behalf Bloor Homes, who is a Partner at Bruton Knowles' Planning and Development Team.

1.3 This report is not intended to be a fully detailed viability appraisal but a concise overview report highlighting the key issues that arise from the Aspinall Verdi Report.

1.4 Bloor Homes principal interests are:

Consented

- Temple Laugherne – strategic allocation in SWDP – Delivering initial phases of 1,400 homes
- Badsey Phase 1, Wychavon – 95 dwellings
- Evesham, Wychavon – 539 dwellings
- Great Witley, Malvern Hills – 90 dwellings

Draft allocation

- Guarlford Road, Malvern Hills – up to 180 homes

Unconsented

- Kempsey, Malvern Hills – potential for c.300 homes
- Hanley Road, Malvern Hills – c.80 homes
- Badsey Phase 2, Wychavon – c.90 dwellings
- Evesham, Wychavon – c.80 dwellings

1.5 For the avoidance of doubt we confirm that this report has been prepared having regard to the latest guidance from the 'Financial viability in planning: conduct and reporting (RICS Professional Standard) and in accordance with the NPPF, PPG and RICS Valuation – Global Standards (Red Book) – effective 31 January 2025 (and RICS Valuation of Development Property 2019 Guidance Note), and that our advice is that of a Suitably Qualified Practitioner, with no Conflicts of Interest as defined therein.

1.6 We confirm that we have acted with objectivity; impartiality; without interference; with reference to all appropriate sources of information; and that no contingent or performance-related fee has been agreed.

2 Viability & Delivery Study Assumptions

2.1 As stated above we only intend to comment upon the key issue/assumptions rather than a detailed assessment of all inputs into all typologies – with a particular focus, from Bloor Homes' perspective, on greenfield sites. The Aspinall Verdi Report sets out its key viability assessment assumptions under the following headings, and we use these to structure our comments:

- Residential Typologies (incorporating residential value assumptions)
- Residential Value Assumptions (including Affordable Housing Transfer Values)
- Residential Cost Assumptions
- Profit Assumptions
- Residential Land Value Assumptions [BLV]

2.2 Residential Typology Assumptions

2.2.1 The Report applies a density of 30 dwellings per hectare ("dph") to sites with fewer than 100 dwellings, and 40 dph to those above 100 dwellings. Reviewing the AV appraisals in the appendices, at 40dph, the residential coverage generated by combining these density assumptions with the residential house types/sizes adopted, is in the order of 16,750sqft per net developable acre (3,845sqm per net developable hectare), which is simply too high a coverage figure to adopt for viability testing. Very few developments reach this level of coverage, and it is recommended that typology adjustments are made to test at circa 15,500 sqft per net developable acre (£3,558sqm per net developable hectare).

2.2.2 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), both of which can have a significant effect on dwelling values. For example, 2.5 storey dwellings are only circa 90% 2 storey revenues on a £/sqft basis, and 3 storey are only c.85%.

2.2.3 NDSS standards have been applied to house size assumptions, but this has not been accompanied by an assessment of affordability. The result of this could be purchasers buying larger floorspace homes but with less, or no more, bedrooms than suit their housing needs. This can affect both GDV (reduction per sqm/sqft) and sales rates. Further, there is something of a disconnect between the adoption of NDSS standards in the viability analysis, and the accommodation (size to bedroom ratio) that is actually delivered by housebuilders on most development – where, most specifically for 1-3 bed dwellings, the house size and price affordability are lower, to reflect actual market demand and affordability.

2.3 Residential Value Assumptions

2.3.1 The Report explains the adoption of Land Registry sales data for both newbuild and second-hand house prices. The risk of adopting this is that, whilst it is accurate as a headline price, implicit within it will be any sales incentives which, for newbuild, might comprise: increased specification, cash-back, deposit paid, part-exchange deals, SDLT paid, carpets, turf, white goods etc, which can inflate the house value assumptions based on this evidence and distort viability analysis. Incentives are in regular use and typically account for 2.5% - 5% of the recorded Land Registry price.

2.3.2 The Report applies floor areas reported within Energy Performance Certificates (EPCs) for dwellings, which do not necessarily represent the GIA measurement basis typically adopted in viability assessments. When applied to Land Registry sales prices, these can inflate the assumed £/sqft and distort viability analysis.

2.3.3 Further, the Land Registry and EPC data does not, with regularity or accuracy, confirm either the number of bedrooms or storey height of a reported sale, both of which are critical elements of the analysis of and application of house price data to proposed schemes.

2.3.4 Over the past 2-3 years, the marketplace for the S106 affordable dwellings on developments has been weak, with reduced interest in the acquisition of S106 dwellings by Registered Providers ("RP's"), along with reduced offers in terms of price and payment profile. Reasons for this include RP's pursuing standalone development sites and investing in portfolio upgrades. The Report assumes Social Rent at 37.5% of Market Values and Intermediate at 70%. Combined with less attractive payment profiles, these 'rule of thumb' allowances for transfer values can no longer be relied on, and sensitivity testing should consider the likelihood of lower transfer values.

2.3.5 Whilst timescales and budget do not permit our preparation of a research document on the scale of the Aspinall Verdi 'Residential Market Paper' (July 2025), produced in support the South Worcestershire CIL Review, we have undertaken a high level review of Land Registry reported newbuild development sales values, achieved on medium to large sized developments, across the relevant area, between Q1 2023 and Q4 2025, comprising some 585 newbuild sales. In all but a small fraction of cases, the published Land Registry values, for dwellings equal or close to the size of the adopted residential typologies, are lower than the relevant residential values adopted by the Report, before any adjustment of the Land Registry figures to reflect the use of sales incentives. Whilst we acknowledge a difference in scale of the analysis undertaken, the high level results appear very clear, and we hypothesise that the Aspinall Verdi analysis applies too much weight to the premium values achieved on smaller, bespoke, village developments, which naturally attract a premium over more standard estate housing schemes, despite the larger estate schemes making up the vast majority of housing delivery and CIL generation.

2.3.6 Further, larger scale development has to progress at a minimum of 0.6 open market sales per week, to ensure an adequate return on capital/keep up with minimum construction rates. Sales prices caught/achieved must reflect this, and this is another reason that sales values of smaller schemes should not be given significant weight in assessing viability across the plan area.

2.3.7 Whilst we estimate the values adopted for housing generally overstate GDVs and therefore the viability of appraisals, of particular note are the flat values reported, which are not truly reflective of prices (likely to be) achieved across the geographical area. Aside from retirement apartments, there is very limited sales data for flats away from the larger settlements of Worcester and Malvern. Even in these locations the evidence is limited, and comprise bespoke schemes and period building conversions, attracting significant premiums, which are not relevant to any flats assumed to be delivered in settlement edge and village locations away from the two settlements identified

2.3.8 Further, the majority of flats are assumed to be delivered as affordable housing, as relatively low specification properties, predominantly on greenfield edge of settlement schemes, at a discount on open market value estimates. Again, the adopted 'market values' for flats are not realistic as the valuation starting point for affordable flatted accommodation, the value of which is estimated by applying an arbitrary percentage discount from the assumed (open) market value rate.

2.4 Residential Cost Assumptions

2.4.1 At this stage, with limited scheme details available, adoption of standard Median BCIS average prices is appropriate, with there being a lack of logic to there being differentiation on the scale of site.

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. There needs to be a separate allowance for the likes of: site preparation, non-frontage roads, services diversions and upgrades, drainage infrastructure, layout of public open space, retaining walls, underbuild, scheme road junctions, contamination, abnormal foundations, elevational treatments, offsite highways/services, archaeology and capping layers. Whilst this list is not exhaustive, any greenfield site will attract some or all of these cost items, and this cost will have material effect on a site's viability. Without reflecting these costs in the Report's viability analysis, it significantly over-inflates the hypothetical land values, which cannot therefore be relied on as an accurate predictor of viability.

2.4.3 It is unclear why differing Contingency allowances have been adopted for Brownfield and Greenfield development at 5% and 3% respectively. This should not vary due to the nature of the scheme because the effect of that (such as whether green or brown field) should be covered under 'abnormal costs', whether construction/site abnormals or infrastructure, and should not affect the base build and external costs. 5% contingency should therefore be adopted for all typologies.

2.4.4 The 6.5% allowance for Professional Fees is insufficient and a figure of 8% should be adopted.

2.4.5 Within the Report/Appendices the cashflows behind the residual appraisal summaries are not visible. As set out at 2.4.2, the Report, at face value, seems to ignore the cost of servicing/infrastructure and site-specific abnormal development costs, which cannot be correct for any scheme. It is therefore not possible to check the inputs utilised and how they all interrelate. Finance costs vary significantly based on when the income and cost is modelled and the profiling of that cost. The calculations behind the report have not been made available to illustrate whether, in the round, the overall finance costs are reasonable. This is particularly the case for large infrastructure heavy developments where significant upfront infrastructure is incurred. We suggest it is incorrect to use the same profiling for all development sites regardless of scale and likewise there should be a difference in cost between brownfield and greenfield. Further, the apparent finance rate adopted is 7%, which we consider insufficient and a rate 4% above the Bank of England Base Rate of 3.75% should be adopted – i.e. 7.75%.

2.4.6 The Report adopts various other construction cost assumptions to meet design requirements, to include the building of a certain number of dwellings to M4(2) or M4(3) standard. 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 as an abnormal cost. Further, these dwelling modifications increase the size of a dwelling without any material change to its accommodation, therefore attracting increased build cost with nominal improvement to its market value.

2.4.7 With regard to Part L&F cost allowances, and Future Homes Standards, the Report groups these together and makes an allowance of £5,816 per house and £2,712 per flat. At present 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. In addition, 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.

2.4.8 The impending Building Safety Levy ("BSL") is not accounted for in the Report, despite there being set rates chargeable from October 2026, 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).

2.4.9 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.

2.5 Profit Assumptions

2.5.1 Aspinall Verdi has adopted a profit return of 20% of GDV for open market housing (sensitivity tested between 15% - 21%) and 6% of GDV for affordable housing.

2.5.2 An issue identified here is the proposed requirement for 25% First Homes as part of the affordable housing provision on any site. Unlike more traditional forms of affordable housing (social, intermediate etc), First Homes are not transferred to a Registered Provider and therefore:

- do not form part of a 'de-risked' pre-construction sales contract,
- will require/incur sales costs (marketing, agency and solicitors) close to those of an unfettered open market dwelling, despite selling at a discounted price
- will compete for purchasers with comparatively priced open market housing on the same scheme

2.5.3 As a result, the profit requirement for First Homes should be akin to open market dwellings at 20% of GDV. Further, First Homes should also attract the same marketing/sales allowances as comparable sized open market dwellings.

2.5.4 Further, based on experience of the marketplace for S106 affordable housing dwellings over the past two to three years, the level of offers and demand from Registered Providers has fallen. This has increased the risk associated with delivering the 'S106 dwellings' of any scheme, and reduced profit typically anticipated from the S106 contract price. 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%.

2.5.5 It is understood that the 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. If this is a SWDP policy requirement, then viability testing needs to consider the construction logistics and the effects on revenues, build costs, planning costs, legal costs and sales rates these will elicit.

2.6 Residential Land Value Assumptions [BLV]

2.6.1 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.

3 Summary

3.1 Therefore, in summary it is our opinion that there are several areas that the Report is flawed and/or requires further clarification. These are stated as follows:

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.

South Worcestershire Councils

Community Infrastructure Levy - Draft Charging Schedule

Response to Public Consultation – 16 March 2026

In the coming days and weeks it is highly likely that the combined South Worcestershire Councils will vote to adopt the South Worcestershire Development Plan (SWDP) - a plan that most local residents don't know about, don't understand and yet it will fundamentally change their lives for the next 20-30 years.

The main thrust of the SWDP is a strategic choice for the development of Wychavon Town, a concentrated New Town of 10,000 houses located in rural farmland – a Green Field development in preference to more distributed brown field developments.

At first glance this may seem a reasonable choice and indeed is enthusiastically endorsed by Central Government and Local Councillors alike.

However, strategic choices have consequences and green field developments require sizeable investment in essential infrastructure which must be designed, funded, constructed and commissioned in advance, or at minimum alongside, housing delivery.

The National Planning Inspectorate understand the need for clear infrastructure plans and delivery obligations and a pre-requisites for this are:

- A full and detailed evaluation of infrastructure needs;
- A full costed infrastructure schedule;
- A clear and phased delivery plan; and
- A convincing statement on the source and availability of funding.

If the plan is not fully deliverable – both from a timeline and funding perspective, then it should not be adopted.

The CIL charging schedule is one part of this funding balance that must be in place alongside other commitments for delivery success. If these other elements, in particular the infrastructure list and the additional funding commitments and contracts (e.g. S106 commitments), then the CIL is an isolated cost element that is not fully representative of a sound funding mechanism for the SWDP>

And this brings us to the subject of Viability - the equation that says at some point the cost of delivery outweighs the commercial profit potential - the point at which developers and promoters of sites withdraw. Worcestershire Council evaluated viability in December 2025 - and the answer is that the assumptions on the percentage affordable homes and the need for infrastructure investment in a green field site moves Wychavon Town to the edge of unviability.

The consequence of this is that Developers and Council members are making every effort to minimise infrastructure requirements, delay detailed costing, obfuscate the financial reality, such that Worcestershire County Council sign-up to **a strategy they cannot afford, yet are legally obliged to pursue.**

Strategy without the means of delivery is just a worthless piece of paper.

My point then on the CIL are as follows:

- What is the relationship between the CIL charging schedule and the balance of funds needed to successfully deliver the SWDP?

- How can the CIL charging schedule be agreed before other S106 agreements are adequately defined and in place?

- How can developers of strategic sites have their CIL set at zero % - when they have no formal and signed agreement in place for S106 funding and where there is no clear view that the funds available are adequate to cover the infrastructure needs in full?

- If development viability is the key criteria on setting the CIL – why is developer profitability set at 20% - why not 15% or even 10%, how was this decision taken and by who? Do we know that developers and promoters will walk away at 15% profit margin? Has this assumption been tested and if so where?

- There is a requirement to annually produce an Infrastructure Funding Statement which must include a list of infrastructure projects that CIL might be spent – this has not been made available for public consultation and comment to date.

- Worcestershire Parkway – Infrastructure Delivery Plan Addendum (December 2024) has not been adequately updated, has not been made public and is incomplete. It is incomplete primarily with respect to road infrastructure where there are significant gaps with additional costs estimated in the region of £50-100Million. Transport modelling is not yet complete and the original developer assumptions on car usage for the new development are unrealistic and aim primarily to minimise infrastructure costs. These model must be completed to reevaluate needs for by-passes and relief roads between Pershore and the M5 North and South junctions.

- 3.4 - CIL will improve the SWCs ability to mitigate the cumulative impacts on infrastructure from most developments as it is charged on a per square metre basis and is proportional to the scale of the development – note: except where there are strategic housing developments where the rate is set at zero % - without any commitment to S106 agreements being in place. This zero rate must not be established before securing formal agreements with developers for infrastructure funding commitments and timings.

- 3.7 Regulation 14 - when considering infrastructure costs, the SWCs need to estimate the cost of infrastructure to support development and take into account other sources of funding. This has not been made clear and based on the Infrastructure Schedules visible to the public the infrastructure list in largely incomplete, with substantial gaps, costs are under-estimated (optimistic) and alternative funding sources unclear or unspecified.

- 4.2 Site specific planning obligations under S106 must satisfy three legal tests (in accordance with Regulation 122); they must be: 1. Necessary to make the development acceptable in planning terms (note that this should not be construed to limited infrastructure spend to inside the development boundary but importantly it should also be applied to funding of infrastructure on the external boundaries and in terms of roads, it should also mean primary routes that transit through the developments.

- 5.1 Aspinall Verdi carried out a review of viability across the districts – however, they did not adequately consider the impact of Compulsory Purchase of Land at agricultural land rates in their review. This instrument for Land acquisition has the opportunity to fundamentally transform the viability equation – from a developer profitability and affordability perspective. Why has no adequate evaluation of this option been conducted prior to the setting of CIL rates? Why is this instrument not being considered for Wychavon Town and other large scale development land? Was this option considered and if so has it been rejected and if so, what was the decision making process?

- 6.1 The SWDP Review contains three new strategic growth areas which will be charged £0 per m2 (Policy SWDPR 55: Worcestershire Parkway (now known as Wychavon Town)… Strategic sites in the SWDP Review should be providing required infrastructure on site and further costs would make these developments unviable – which means that someone else is funding or required to fund the additional infrastructure needs – but this is not clearly set-out in any of the associated SWDP related documents. Are these additional costs identified, are they realistic, are they adequate in size and scale relative to the new development footprints, are they funded and are sources of funding confirmed? Are these additional costs affordable to Worcestershire or Wychavon Council – are they adequately budgeted, accounted for in future budget forecasts and if not why not?

- Table 1: Proposed CIL Charging Rates   Strategic sites (and allocated sites over 1,000 units) should be set at zero % only once formal S106 and Transport Agreements are in place. Until then, a 10% levy on sales should be imposed on all strategic developments and only waivered once formal agreements are in place.

- Table 1: Proposed CIL Charging Rates   why are green field housing between 10-49 units rated lower than other greenfield sites. For other smaller sites, specifically where housing number are less than 50 – why has the CIL been set at zero % ? What is the risk that sites of say 120 houses, then sub-divide their plots and make separate submission each below the 49 property threshold? Why has a sliding scale not been applied, or specific comment made on sites with multiple piecemeal planning applications to prevent the avoidance tactic being pursued by builds and developers? This should be set at the same as other sites – e.g. £120/square meter, to avoid unintended consequence of fragmented planning applications for the same contiguous development site.

- 7.12 There is not sufficient headroom to charge CIL in the current economic market – this in unproven and in particular with regard to the use of Compulsory Purchase Agreements where strategic development land is sourced at agricultural land values. Financial viability is no reason for excluding strategic developments from CIL charges. Why has Compulsory Purchase Agreements at agricultural land prices not been actively pursued as a part of the Strategic Sites identified?

- 7.12 S106 agreements enable more flexibility – agreed. However, these must be in place before CIL rates are set at zero %. The wording should be that the intention is to move strategic sites to zero % once a formal S106 or other funding agreements have been confirmed.

This CIL draft schedule appears thin, relative to the 1000's of pages of other planning documents available for review, and yet represents one of the most fundamental aspects of sustainable development – the funds made available to support a viable community.

I urge the Council and National Inspectors to review the above points and take funding mechanisms as seriously as they do all other aspects of housing development.

Kind regards,

[redacted]

Outlook

Draft Response CIL Draft Charging Schedule consultation 2026

From [redacted]
Date Mon 16/03/2026 16:50
To SWDP - WCC <SWDP@worcester.gov.uk>

CAUTION: This message originated outside of South Worcestershire council's IT network.
THINK TWICE before clicking links, attachments or QR codes.

OFFICIAL

Dear Sir/Madam,

Draft Response CIL Draft Charging Schedule consultation 2026

These representations are submitted by Homes England in response to the consultation on the South Worcestershire Councils (SWCs) Community Infrastructure Levy (CIL) Draft Charging Schedule 2026. Homes England is working collaboratively with the Councils and other landowners, including its collaboration partner Summix, to bring forward a substantial proportion of the new settlement at Worcestershire Parkway (Wychavon Town). Accordingly, these comments are made by Homes England with specific reference to this strategic site.

<u>Comments on Paragraph 7.13 and Table 2</u>

1. Table 1 of the Draft Charging Schedule confirms that strategic sites, including Worcestershire Parkway (Wychavon Town), will be charged £0 per m^2. Homes England supports this position.

2. Strategic sites of this scale will be required to deliver substantial infrastructure directly related to the needs generated by the new development. The SWDP Review evidence base—specifically the Worcestershire Parkway Infrastructure Delivery Plan (IDP)—identifies an extensive package of infrastructure necessary to support the new settlement at Worcestershire Parkway (Wychavon Town). This results in a significant IDP infrastructure cost, which developers will address through Section 106 planning obligations. These obligations will fully mitigate the development's impacts, and therefore no additional contributions through CIL are required or justified.

3. However, the Draft Charging Schedule does not consider situations where development adjacent to, but outside, a defined strategic site would benefit from infrastructure delivered via a framework Section 106 agreement. For development located close to, but beyond, the strategic allocation boundary, Section 106 rather than CIL will often be the more appropriate mechanism. This ensures infrastructure is delivered in tandem with development and that financial contributions align with the specific requirements of the Worcestershire Parkway (Wychavon Town) settlement. These requirements include a bespoke infrastructure package covering green infrastructure; health; education (primary, secondary, SEND, and sixth form provision); community facilities; and transport improvements. This approach aligns with the emerging Wychavon Town Masterplan SPD, which sets out expectations for land "in the vicinity" of the allocation (page 177).

    > *Where developers of parcels of land lying in the vicinity of the allocation make planning applications for development not being exempt development (as described above) which development will benefit from the strategic infrastructure provided or funded by development within the allocation, those developers may also be required by the Council to contribute towards the cost of such strategic infrastructure via a section106 agreement. The Council shall*

determine on a case-by-case basis, in line with the statutory tests for planning obligations, whether such contributions or a proportion thereof should be payable.

Amendments to Paragraph 7.12 sought:

-

4. To respond to a scenario where developers of parcels of land lying in the vicinity of the allocation make planning applications for development we suggest the following amendments to Paragraph 7.12

   *Paragraph 7.12 There is not sufficient headroom to charge CIL in the current economic market; it is important for delivery that the infrastructure is funded through the most appropriate mechanism. S106 agreements enable more flexibility (especially in two-tier authorities) for the delivery of infrastructure compared to CIL. This is particularly the case where there is uncertainty in respect of the strategic infrastructure costs due to the stage of South Worcestershire Councils CIL Draft Charging Schedule January 2026 – Draft Version 1.0 14 design and phasing. It is therefore proposed that the CIL charging Schedule excludes all allocated sites over 1,000 units which will ensure the Charging Schedule is 'future**[1]**proofed'.* ***The nil CIL rate for strategic sites will be capable of being applied beyond the existing 'red line' boundaries of the strategic growth areas, including Worcestershire Parkway (Wychavon Town) as shown on Map 1. This would ensure that land in the vicinity where it represents a logical expansion to a strategic growth area and generates additional infrastructure demand can be secured through a Section 106 agreement incorporating the FS106 terms, rather than being made liable for CIL.***

Comments on Paragraph 7.13 and Table 2

5. Table 2 sets out the proposed CIL rates for retail and commercial development. Unlike Table 1 for the residential CIL rates, Table 2 does not exclude CIL charges for retail and commercial development on strategic sites. This also appears to contradict paragraph 6.1 which states that *"the SWDP Review contains three strategic sites which will be charged £0 per m2. These are shown in Map 1."* Homes England considers that Table 2 should be amended to make it clear that retail and commercial development on strategic sites will also be charged £0 per m2 (see justification below).

6. Homes England and its collaboration partner, Summix, submitted a *Town Centre Delivery Strategy* in December 2025 as supporting evidence for the Town Centre Application at Wychavon Town. This identifies a number of challenges associated with delivering town centres within new settlements, including:

   - Retail uses only become viable once a sufficient number of new homes have been occupied to provide a stable customer base.
   - Social infrastructure (such as community facilities) is typically secured through Section 106 Agreements, with delivery tied to housing completion triggers and developer cashflow.
   - In many schemes, housing and town centre uses have been treated as separate components—often delivered by different developers, which has contributed to difficulties in delivering town centres early. Early delivery, however, is critical to establishing placemaking, identity, and long-term sustainability.

7. If CIL charges are applied to commercial uses, this is likely to create a further barrier to delivering a viable and successful town centre, a critical and essential element to establishing a sustainable new community at Worcestershire Parkway (Wychavon Town). All development should be mitigated via Section 106 obligations so that an infrastructure package can be tailored to the specific impacts of the development scheme.

8. **Amendment sought to Paragraph 7.13 and Table 2:** paragraph 7.13 and table 2 should be amended **to exclude CIL charges for retail and commercial development on strategic sites** in order to assist in the delivery of a viable and sustainable town centre (and local centres) at Worcestershire Parkway (Wychavon Town) and ensure a consistent approach for all development at Worcestershire Parkway (Wychavon Town) which will be mitigated via Section 106 obligations and remove ambiguity that might be caused if some elements of the scheme are CIL liable.

Homes England would like to be updated on / and participate in future stages of preparation of the CIL charging schedule.

Best regards

[redacted]
Senior Planning and Enabling Manager
[redacted]

Homes
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The Housing and Regeneration Agency
We believe that affordable, quality homes in well-designed places are key to improving people's lives.
We make this happen by using our powers, expertise, land, capital, and influence to bring both investment
to communities and to get more quality homes built.

Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk

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Turley

16 March 2026
Delivered by email to swdp@worcester.gov.uk

South Worcestershire Development Plan Team
The Civic Centre
Queen Elizabeth Drive
Pershore
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Ref: TAYQ3047

Dear Sir/Madam

SOUTH WORCESTERSHIRE COUNCILS - COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE CONSULTATION – REPRESENTATIONS ON BEHALF OF TAYLOR WIMPEY

We write on behalf of our client, Taylor Wimpey PLC (Taylor Wimpey) in response to the South Worcestershire Councils (SWC) Community Infrastructure Levy (CIL) Draft Charging Schedule consultation published in February 2026. This document intends to replace the 2017 Charging Schedules of the individual local planning authorities.

Context

Taylor Wimpey is a leading UK-based residential developer formed in 2007 through the merger of merging George Wimpey and Taylor Woodrow. Operating through 22 regional UK businesses, they are one of the UK's largest residential developers, building a wide range of homes in the UK, from apartments to six-bedroom houses. In 2024 they completed 10,593 new homes, including joint ventures, 22% of which were affordable homes.

Taylor Wimpey have previously developed numerous housing sites within the SWC area and continue to promote and progress new sites. Of particular note, is the development of circa 20h land off Boat Lane, south west of Evesham town centre. Reserved matters for Phase 1 were submitted by Taylor Wimpey in 2022 and comprises 159 residential dwellings. The application was approved by Wychavon District Council in October 2024 and construction of the scheme commenced in April 2025. Taylor Wimpey intend to move onto delivery of phase 2, and also intend to continue to deliver housing across the area in the current and future plan periods.

Boat Lane phase 1 was liable for a c.£585,000 CIL payment, representing a significant additional cost for the development. Given SWC now propose to revise the Charging Schedule, Taylor Wimpey are concerned about the potential impact this could have on the delivery of future residential development across the area, including phase 2 of the Boat Lane site (if a standalone full application is ever needed), particularly in light of the significant housing need in the region. This letter outlines these concerns in further detail.

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Revised Charging Schedule

The Charging Schedule proposes differential rates based on the type, size and location of new development. This ranges from £0 for strategic sites, build to rent and extra care, up to £136.70 for greenfield PBSA.

Whilst the nil charge for strategic sites and brownfield sites (excluding RDAs) over 10 units is welcome, our client is concerned with the scale of the proposed increases for greenfield sites of 50 units or more.

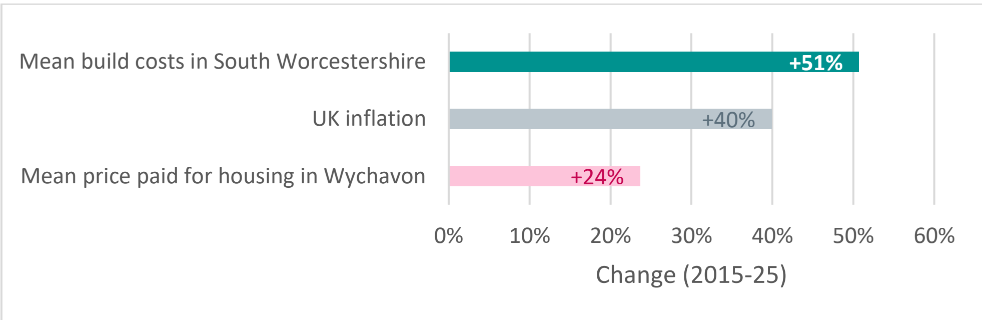
The current CIL Charging Schedule, adopted in April 2017, set a charge of £40 psm for residential development outside Main Urban Areas. Table 1 of the current consultation's Viability Assessment references the current charge as £43.27, which suggests it includes indexation; however, this figure appears to be incorrect and is assumed to be £53.27. Notwithstanding this, the proposed charge of £120 is a significant increase on the current position, representing a 200% increase on the original 2017 charge (or 125% of the indexed figure).

The Boat Lane Reserved Matters described previously were subject to a CIL charge of £585,780.84 for c. 11,000 sqm GIA of market housing floorspace. A scheme of the same area, approved under the proposed new CIL Charging Schedule would be liable for a charge of £1,319,520 – an increase of circa £734,000. These are not insignificant sums and could have significant impacts on the viability of new development.

Development Viability

Developers have been faced with increasingly high build costs in South Worcestershire. Estimates available from the Building Cost Information Service[1] (BCIS) suggest that each of the three authorities has seen build costs per square metre increase by some 51% over the decade to 2025, not only outpacing the rate of inflation[2] (40%) but also being more than twice the growth of house prices in South Worcestershire over the same period[3] (24%).

Figure 1: Benchmarking Rise in Build Costs in Wychavon (2015-25)



Source: BCIS; Land Registry; Bank of England

Rising build costs are driven by a number of factors which create continued pressure on the industry, including:

- High UK construction cost inflation, with labour a significant inflation driver;
- Supply chain pressure driving up material prices, particularly on energy intensive materials;

[1] http://online.bcis.co.uk. "Average prices" for mixed residential developments, rebased to Q4 of each year and to each of the South Worcester authorities. While build costs are believed to vary within South Worcestershire, the implied rate of growth is identical and they are consequently grouped for the purposes of this analysis
[2] https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator
[3] Land Registry (2025) Price Paid Data. This captures sales reported to date in 2025, to enable direct comparison

- Volatility and uncertainty at bid stage with contractors, with risk being increasingly pried in;
- Labour shortages in the sector which increases about costs and programme length;
- Reduced incentives to buy and wider affordability constraints, in particular for first time buyers continues to contribute to subdued sales rates, which consequently impacts on margins and cash flow;
- Rising regulatory and compliance costs, such as Future Homes Standard, BNG, Building Safety Act and increasing infrastructure requirements; and
- Disincentive for landowners to bring forward sites expediently due to reducing land values below market expectations.

Reflecting the above, Taylor Wimpey are concerned that the 'on the ground' reality of scheme viability has not been translated into the Charging Schedule's evidence base and as such are concerned whether the January 2026 Viability Assessment is sufficiently up-to-date and robust given the everchanging economic uncertainty. Economic volatility has been clearly exemplified in recent weeks with the conflict in the Middle East, whereby the potential shocks in the energy market risk dramatically changing this Country's economic outlook.

SWC's original CIL charges were implemented in 2017. Whilst the economy has been subject to numerous 'shocks' in this period, most notably the pandemic and Brexit, it has taken nearly a decade for the Charging Schedule to be revisited. Whilst the CIL regulations allow for more regular updating, it can be assumed that the CIL rates set this year will be the CIL rates governing development in the SWCs for many years to come.

Unlike planning policy requirements that are subject to material considerations, a planning balance exercise and appropriate flexibility through negotiation, CIL liability is a mandatory, fixed and therefore non-negotiable 'tax' on new development. Beyond mechanisms of relief set in the legislation such as exceptional circumstances or discretionary relief, CIL can pay no regard to the overall merits of a development, site-specific circumstances or the impact of CIL liability on the deliverability of a scheme.

In the context of housing need and demand in the SWC area, this inflexible charge could have significant implications.

Housing Need

Delivery of new homes is a national endeavour, exemplified by the Government's commitment to delivering 1.5 million new homes in this Parliament. The difficulty in fulfilling such a promise is well documented, but will require an exceptional effort at national, regional and local level.

Under NPPF paragraph 78, local planning authorities must identify a five-year supply of deliverable housing sites against their local housing need, with a 5% buffer, or 20% where there has been persistent under-delivery. The South Worcestershire Development Plan (2016) is now more than five years old, meaning that housing land supply must be assessed against the standard method rather than the adopted plan requirement. For Wychavon District Council, in which the Boat Lane site referenced earlier is located, the Council cannot currently demonstrate a five-year housing land supply (5YHLS) with a figure of only 1.28 years.

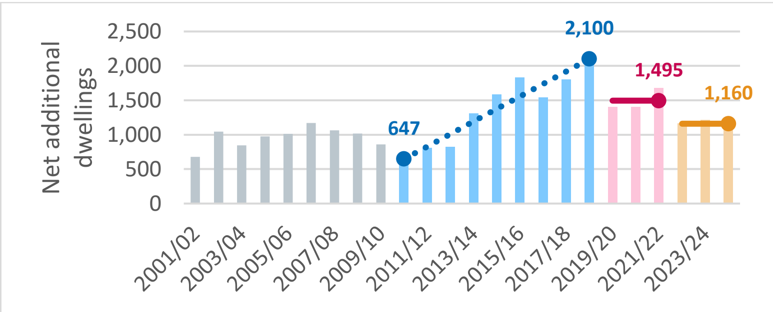
The South Worcestershire Development Plan Review (SWDPR) is expected to be adopted this spring, and it is expected that the Council will be able to demonstrate a marginal five-year supply at this point. However, under the NPPF (2024) transitional provisions, from 1 July 2026, plans adopted under the new regime are subject to a 20% buffer creating a six-year housing land supply (6YHLS) requirement. The SWDPR trajectory relies heavily on large strategic allocations (including Worcestershire Parkway, Worcester West, Rushwick Expansion), which are subject to long lead-in times, complex infrastructure dependencies and phased delivery patterns. The development of greenfield sites will be essential in meeting these requirements.

It remains to be seen whether the Council will be able to demonstrate a 6YHLS beyond July, but anything which undermines delivery will be counterproductive in the context of a recently adopted Plan and the government's objectives to significantly boost the supply of housing. A significant increase in CIL is likely to be one such barrier.

Housing Demand in South Worcestershire

The demand for housing in South Worcestershire has only recently supported a more than threefold increase in the rate of new provision, over eight years to 2019[4]. This did though subsequently fall by some 29% over the following three years, and this too has been followed by a further 22% fall over the latest three years which have seen the fewest homes completed in South Worcestershire since the aftermath of the credit crunch.

Figure 2: Housing Completions in South Worcestershire (2001-25)



Source: MHCLG

This can be at least partly attributed to falling demand. Land Registry data confirms that sales rates in South Worcestershire had returned to pre-crash levels by 2014, after having almost halved in 2008, and they remained notably stable over the subsequent five years in which an average of around 5,730 sales were recorded annually[5]. The certainty brought by such stability will have no doubt supported the 60% boost in delivery recorded over the same period[6] (2013-19). While the next three years brought fluctuations – partly linked to the pandemic – the average annual number of sales remained broadly consistent at circa 5,690 per annum. There was though a 19% drop across 2023 and 2024, as the last two years to have been completely reported by the Land Registry, and although data for last year is incomplete there are signs that rates have fallen once again[7].

[4] MHCLG (2025) Table 122: Net additional dwellings by local authority district, England 2001-02 to 2024-25
[5] Land Registry (2025) Price Paid Data
[6] MHCLG (2025) Table 122: Net additional dwellings by local authority district, England 2001-02 to 2024-25
[7] It typically takes at least 30 days for a property sale to be reported by the Land Registry, but they commonly take around three months. This means that many of the sales that took place in the latter part of 2025 will have not yet been reported, as of the time of analysis in late February 2026

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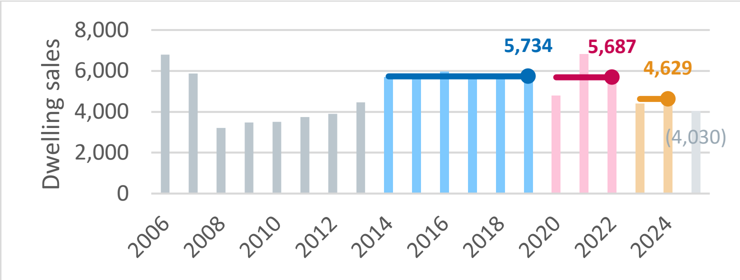
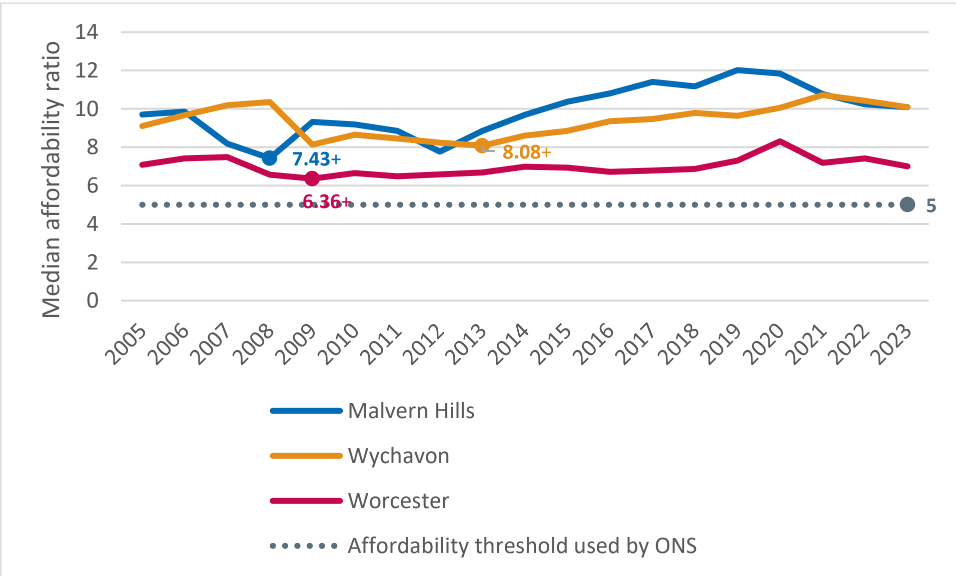


Source: Land Registry; Turley analysis ** reporting not yet complete*

The situation is unlikely to have been helped by the stubbornly high cost of housing in South Worcestershire compared to the earnings of those working in the area, many of whom are likely to have thus been deterred from purchasing especially when faced with a wider cost of living crisis. While the Office for National Statistics (ONS) uses a threshold of five years as '*a broad indicator of affordability*'[8] – and the Government has also explicitly referred to this itself[9] – housing at the midpoint of the market has cost no less than 6.4 years' earnings in each of the South Worcestershire authorities throughout the last two decades, or indeed no less than 7.4 years' earnings outside Worcester.

Figure 4: Housing Affordability in South Worcestershire (2005-24)



Source: ONS

Summary

In light of the development viability concerns, ever-increasing costs and weak demand, the significant proposed increase in non-negotiable CIL charges risks harming the viability and deliverability of the pipeline of residential development within the SWC area. This could lead to sites being delayed or not being delivered altogether, and where sites do progress, they may be forced to reduce affordable housing to offset the additional charge. Delayed delivery of housing will be a significant issue given the Councils' precarious housing land supply position; and any potential

[8] ONS (2025) Housing affordability in England and Wales: 2024
[9] MHCLG (2024) Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation

reduction in affordable housing delivery is similarly concerning. Taylor Wimpey strongly therefore urge the SWC to reconsider the level of proposed CIL increases.

We trust that these representations will be given due consideration should the Draft Charging Schedule proceed and would welcome a discussion on the content of these representations and the opportunity for our client to appear at the Examination.

Yours sincerely

[redacted]

Director

Turley

13 March 2026
Delivered by email to swdp@worcester.gov.uk

South Worcestershire Development Plan Team
The Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT

Ref: BELQ3017

Dear Sir/Madam

SOUTH WORCESTERSHIRE COUNCILS - COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE CONSULTATION – REPRESENTATIONS ON BEHALF OF BELLWAY

We write on behalf of our client, Bellway Homes Limited (Bellway) in response to the South Worcestershire Councils (SWC) Community Infrastructure Levy (CIL) Draft Charging Schedule consultation published in February 2026 which aims to replace the 2017 Charging Schedules of the individual local planning authorities.

Background and Context

Bellway has grown from a small, family-owned firm to one of the most successful housebuilders in the UK. The firm has earnt an enviable reputation, built on the pillars of quality, service and trust. They build high-quality homes designed to complement the style of existing local housing in developments that meet local demand and enhance the community. In recognition of their exceptional quality housing, Bellway have been awarded 5-star housebuilder status by the Home Builders Federation for the tenth year running.

Bellway has developed a number of sites within the SWC area. In December 2025, they submitted a planning application to Malvern Hills District Council (M/25/02042/FUL) for two sites on land either side of the A4103 in Rushwick, comprising 105 homes on the southern site and 7 travelling showpeople plots on the northern site, the latter being the draft allocation in the South Worcestershire Development Plan Review.

The representations set out in this letter reflect our client's concerns with the draft Charging Schedule and the risks associated in the circumstances of the current economic climate. Their concerns relate directly to the potential impact of the updated charging schedule on bringing forward much needed residential development across the local planning authority areas. This concern is particularly pertinent given that any increased costs required as part of the planning and development process are likely to undermine the viability of development schemes to come forward as well as their ability to deliver policy compliant affordable housing.

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Proposed Charges

The Charging Schedule proposed differential rates based on the type, size and location of new development. This ranges from £0 for strategic sites, build to rent and extra care, up to £136.70 for greenfield PBSA. Of particular interest to our client are the proposed figures for greenfield housing, set at £120 psm for all schemes (except 10-49 unit schemes at £54.70). This represents a **125%** increase on the charge of the current indexed charge of £53.27[1] psm, or a 200% increase on the original 2017 charge of £40 psm. In this same period since 2017, development costs have continued to rise yet house prices have not increased by anywhere near this level. This makes a proposed CIL increase of this scale a significant concern.

A baseline CIL calculation for the Rushwick scheme (as submitted, amendments to be made) described demonstrates the potential level of impact of such a change:

Market Housing Proposed Residential Floorspace (GIA)	Current CIL Charge (£53.27)	Proposed CIL Charge (£120)	Increase	
5,090 sqm	£271,144	£610,000	***£339,656***	***125%***

Housing Need

The Government has consistently identified the goal of delivering 1.5 million new homes in this Parliament as a key goal. In December 2024 the Deputy Prime Minister, in publishing a revised, pro-growth NPPF wrote to all local authority leaders in England. It began:

> *"We inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade."*

Delivery of new homes is a national endeavour, and the need for such houses is key and pressing issue for the South Worcestershire Councils.

Under NPPF paragraph 78, local planning authorities must identify a five-year supply of deliverable housing sites against their local housing need, with a 5% buffer, or 20% where there has been persistent under-delivery. The South Worcestershire Development Plan (2016) is now more than five years old, meaning that housing land supply must be assessed against the standard method rather than the adopted plan requirement. For Malvern Hills District Council, in which Bellway's Rushwick site is located, the most recent correspondence from the Council's policy team confirmed the Council cannot currently demonstrate a five-year housing land supply (5YHLS) with a figure of only 2.61 years.

The South Worcestershire Development Plan Review (SWDPR) is expected to be adopted this spring, and it is expected that the Council may be able to demonstrate a marginal five-year supply at this point. However, under the NPPF (2024) transitional provisions, from 1 July 2026, plans adopted under the new regime are subject to a 20% buffer creating a six-year housing land supply (6YHLS) requirement. The SWDPR trajectory relies heavily on large strategic allocations (including Worcestershire Parkway, Worcester West, Rushwick Expansion), which are subject to

[1] Table 1 of the Viability Report references a current CIL charge of £43.27. This appears to be a typo given the pre-indexation charge in 2017 was £40 and therefore it is assumed this should read £53.27

long lead-in times, complex infrastructure dependencies and phased delivery patterns. It remains to be seen whether the Council will be able to demonstrate a 6YHLS beyond July, but anything which undermines delivery will be counterproductive in the context of a recently adopted Plan and the government's objectives to significantly boost the supply of housing. One such barrier in our view is the significant increase in CIL.

Housing Demand in South Worcestershire

The demand for housing in South Worcestershire has only recently supported a more than threefold increase in the rate of new provision, over eight years to 2019[2]. This did though subsequently fall by some 29% over the following three years, and this too has been followed by a further 22% fall over the latest three years which have seen the fewest homes completed in South Worcestershire since the aftermath of the credit crunch.

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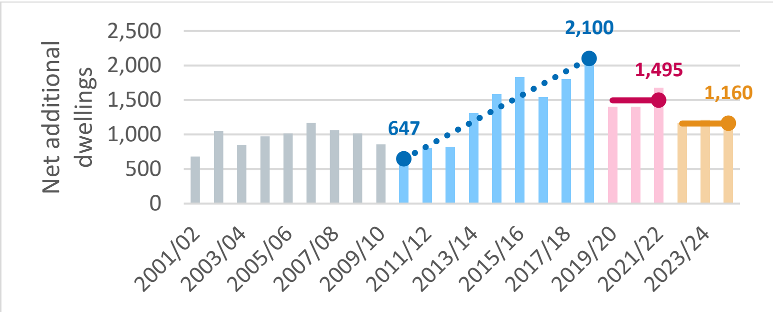

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This can be at least partly attributed to falling demand. Land Registry data confirms that sales rates in South Worcestershire had returned to pre-crash levels by 2014, after having almost halved in 2008, and they remained notably stable over the subsequent five years in which an average of around 5,730 sales were recorded annually[3]. The certainty brought by such stability will have no doubt supported the 60% boost in delivery recorded over the same period[4] (2013-19). While the next three years brought fluctuations – partly linked to the pandemic – the average annual number of sales remained broadly consistent at circa 5,690 per annum. There was though a 19% drop across 2023 and 2024, as the last two years to have been completely reported by the Land Registry, and although data for last year is incomplete there are signs that rates have fallen once again[5].

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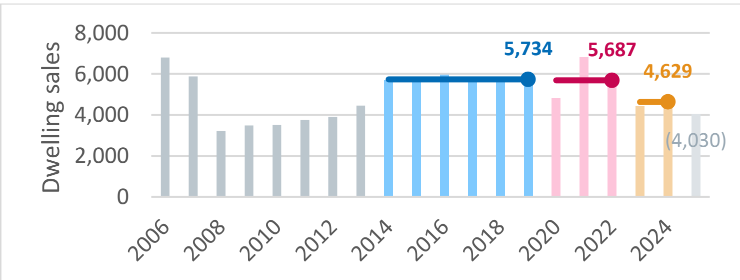

[2] MHCLG (2025) Table 122: Net additional dwellings by local authority district, England 2001-02 to 2024-25
[3] Land Registry (2025) Price Paid Data
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Source: Land Registry; Turley analysis * reporting not yet complete

The situation is unlikely to have been helped by the stubbornly high cost of housing in South Worcestershire compared to the earnings of those working in the area, many of whom are likely to have thus been deterred from purchasing especially when faced with a wider cost of living crisis. While the Office for National Statistics (ONS) uses a threshold of five years as '*a broad indicator of affordability*'[6] – and the Government has also explicitly referred to this itself[7] – housing at the midpoint of the market has cost no less than 6.4 years' earnings in each of the South Worcestershire authorities throughout the last two decades, or indeed no less than 7.4 years' earnings outside Worcester.

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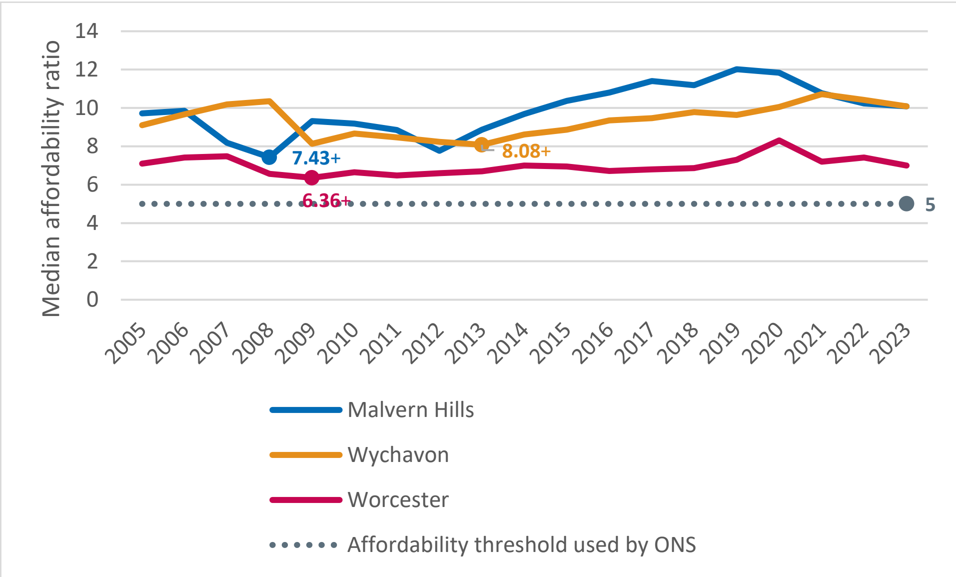

Source: ONS

Development Viability

Developers have, in parallel, been faced with increasingly high costs when looking to build housing in South Worcestershire. Estimates available from the Building Cost Information Service[8] (BCIS) suggest that each of the three authorities has seen build costs per square metre increase by some 51% over the decade to 2025, not only outpacing the rate of inflation[9] (40%) but also being more than twice the growth of house prices in South Worcestershire over the same period[10] (24%).

[6] ONS (2025) Housing affordability in England and Wales: 2024

[7] MHCLG (2024) Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation

[8] http://online.bcis.co.uk. "Average prices" for mixed residential developments, rebased to Q4 of each year and to each of the South Worcester authorities. While build costs are believed to vary within South Worcestershire, the implied rate of growth is identical and they are consequently grouped for the purposes of this analysis

[9] https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator

[10] Land Registry (2025) Price Paid Data. This captures sales reported to date in 2025, to enable direct comparison

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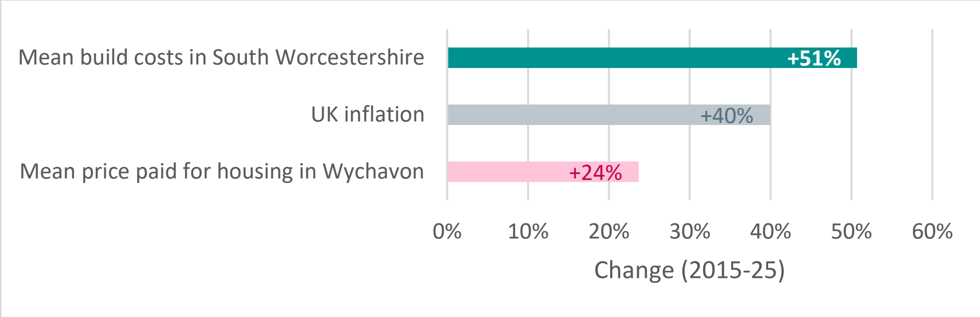
Figure 4: Benchmarking Rise in Build Costs in Wychavon (2015-25)



Source: BCIS; Land Registry; Bank of England

It is vital that in reflecting on updated CIL charges, appropriate weight is given to the continued significant pressures which threaten the viability of housing delivery. Ongoing factors include, but are not limited to:

- High UK construction cost inflation, with labour a significant inflation driver;
- Energy-intensive materials (e.g. cement, bricks) remain expensive due to persistent supply-chain pressures;
- Volatility and uncertainty at bid stage with contractors are increasingly pricing risk into tenders, particularly around safety compliance;
- Ongoing labour shortages, particularly in technical roles (for instance quantity surveyors) which elevate labour premiums and extend programmes;
- The effect on cash flow and margins caused by subdued sales rates, reduced incentives and affordability constraints, particularly for first-time buyers;
- Ever rising regulatory and compliance costs, such as Future Homes Standard, BNG, Building Safety Act (and incoming Building Safety Levy) and increasing infrastructure requirements; and
- Disincentive for landowners to bring forward sites expediently due to reducing land values below market expectations.

Reflecting the above, our client has concerns with the evidence being relied upon by the SWCs, most particularly in terms of whether it is sufficiently up-to-date given the significant shifts in national and international circumstances and an everchanging economic outloook. Indeed, in the short period the deadline of this consultation changed from 2 March to 16 March, the sudden conflict in Iran has seen a rapid rise in oil prices and placed a further cloud of uncertainty over the economy.

While planning policy requirements are subject to relevant material considerations and an overall planning balance exercise that is typically subject to a reasonable degree of negotiation, CIL liability is different. It is a mandatory, fixed and therefore non-negotiable 'tax' on new development which can pay no regard to the overall merits of a development, its site-specific circumstances or the benefits that a scheme could otherwise deliver. There is therefore very limited scope for discretion with how the CIL Charging Schedule is applied once adopted.

If the proposed charging levels included within the schedule substantially harm the viability and deliverability of the pipeline of residential development within the Councils, there is a real risk to planned investment. When faced with ever-increasing costs and weak demand, increasing an additional non-negotiable cost like CIL may lead to viability

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issues on some sites. This could lead to sites being delayed or not being delivered altogether. Some of the sites which do progress may be forced to reduce affordable housing.

Delayed delivery of housing will be a significant issue given the Councils' precarious housing land supply position; and the potential reduction in affordable housing delivery is similarly concerning. This is highlighted recently with Worcester City Council's comments (16th February 2026) on Bellway's planning application in Rushwick, confirming:

> *'There are 1572 households on Worcester City Council's housing register in 'Reasonable Preference' bands – i.e. assessed as either being homeless, threatened with homelessness or living in unsuitable accommodation and needing to move. This is in addition to the approximately 600 households in Reasonable Preference bands on Malvern Hills District Council's housing register and approximately 1,300 households in the Reasonable Preference bands on Wychavon District Council's housing register.'*

Bellway strongly therefore urge the SWC to reconsider the level of proposed CIL increases.

We trust that these representations will be given due consideration should the Draft Charging Schedule proceed and would welcome a discussion on the content of these representations and the opportunity for our client to appear at the Examination.

Yours sincerely

[redacted]

Director

CIL Survey Results

Rep ID	Q1. I consent to my details being used for the purposes as set out on the previous page	Q2. Your (client) details: Please note: if you are an agent appointed on behalf of your client, please complete only the Title, Name and Organisation of your client (if applicable) in the Section below. Please then complete the full contact details of the agent after clicking Yes in question 3. Q2.1. Title	Q2.2. First name	Q2.3. Last name	Q2.4. Job title (where relevant)	Q2.5. Organisation (where relevant)	Q3. Has an agent been appointed?	Q4. Agent's details:	Q5. Which city or district do you live in?	Q6. Are you a representative of a business or other organisation? Answer	Q6. Please provide the name:	Q7. Do you agree that the CIL charging schedule is in line with the CIL regulations and is therefore legally compliant?	Q8. Do you have any comments on the content of the viability evidence base documents?	Q9. Do the proposed charges adequately reflect the conclusions of the CIL viability evidence? Answer	Q9. Please provide a reason for your response	Q10. Do you have any comments on the proposed CIL rates?	Q11. Do you have any further comments to make?	Q12. Would you like to be notified of the submission of the CIL Draft Charging Schedule?	Q13. Would you like to be notified of the submission of the receipt of the examiner's report?	Q14. Would you like to be notified of the approval of the charging schedule?	Q15. Would you wish to speak at examination?
16	Yes	[redacted]			-	-	No	-	Wychavon	Individual	-	Yes	-	Yes	-	-	The increased development of land, especially greenbelt, is done because it is cheaper then having to put effort into developing brownfield sites - which should be considered before any other area - so they can make a bigger profit. To offset this, developers should be liable for a larger percentage of costs to ensure the areas they are building in have appropriate facilities (ie schools, GP, green spaces/allotments for mental health, etc). This should be considered first, not shoehorning houses into already stretch facilities, taking the profit and leaving.	Yes	Yes	Yes	No
17	Yes	[redacted]			-	-	No	-	Wychavon	Individual	-	Yes	It is important infrastructure is addressed before planning consent	Yes	-	-	-	Yes	Yes	Yes	No
19	Yes	[redacted]			-	-	No	-	Malvern Hills	Individual	-	Yes	See below	No	See below	I am opposed to 'developers' doing ANY new building in the already over-developed Malvern Hills area. The only reason for building here is the failure of national governments in the last 20 years to control immigration and keep the population at a sustainable level. There should therefore be no building on any sites, much less greenfield and brownfield.	-	Yes	Yes	Yes	No
20	Yes	[redacted]			Tetired	None	No	-	Wychavon	Individual	-	Yes	None	Yes	The infrastructure is in desperate need of improvement, CIL is needed at a sensible level, not a token level	I would consider thus a minimum level and increase in accordance to location	-	Yes	Yes	Yes	Yes
21	Yes	[redacted]			-	-	No	-	Wychavon	Individual	-	Yes	-	Yes	-	-	-	Yes	Yes	Yes	No
23	Yes	[redacted]			-	Woodland Contractors Limited	No	-	None of the above	Business	Woodland Contractors Limited	No	-	No	The CIL should not exist. It is a stealth tax that has crept in via the back door. This tax will be passed onto the consumer and therefore will increase house prices, making it more difficult for first time buyers and causing the housing market to stagnate further.	If we accept that we have the CIL here to stay, a reasonable increase would be in line with inflation - not what you propose.	The existence of CIL, and the payment timescale connected with CIL, has caused my business to delay construction of a residential home that could have been brought to market much sooner. I would like to see evidence that all CIL monies are actually spent on Community Infrastructure.	Yes	Yes	Yes	No

24	Yes	[redacted]			Architect	Rio Severn Limited	No	-	Malvern Hills	Individual	-	-	-	-	-	Paragraph / Clause 7.6 in particular includes a fundamentally incorrect statement - with almost all of the land around Wychavon and Malvern Hills being RDAs, affordable housing contributions are made on all developments. Sites of 1-9 dwellings in all villages in Wychavon and Malvern Hills must contribute to affordable housing, either through an off site contribution of £12,797 per unit for schemes of 1-4 dwellings, or on-site provision for schemes of 5-9 dwellings. The proposed CIL charges appear unfairly balanced to the detriment of small developers of housing schemes for 9 or less dwellings - whether on green or brown field sites. I find the proposed strangulation of small business ambition to be abhorrent. The proposed CIL charges will make it very difficult for small developers to operate, will reduce land values to the detriment of local people and businesses, and will harm the delivery of dwellinghouses.	-	Yes	Yes	Yes	No
25	Yes	[redacted]			-	-	No	-	Malvern Hills	Individual	-	No	Proposed uplifts in charging are outside of government guidelines in respect of inflation and cost of living control	No	Proposed fees are unjustified and will discourage the wider range of development size necessary to meet new house building targets	Unjustified, too high and counter productive.	The proposal, if adopted will be damaging the SME's in this country who are the most able to contribute to solving the housing supply crisis.	Yes	Yes	Yes	No
26	Yes	[redacted]			-	-	No	-	Wychavon	Individual	-	Yes	None	Yes	The conclusions zre followed through	The baseline profit for 10-49 houses with an affordable content of 40% provides a combined baseline percrntage of 14%.This is after charging the £54.70 CILThere is considerable margin for increasing the CIL to £120 for greenfield sites.Table 10.1For sites of 50 or more on greenfield land ,with a baseline of 14% there is margin also to increase. the rate to above £157 .	The CIL should be spent on specific projects such as increasing the inpatient beds at Worcester Royal,cycle paths between Worcester and Evesham and Malvern certainty of foul water systems,improvement in comunity green space for both new communities and for existing settlements (community orchards, playing fields) and uniformity in school admissions ages.	Yes	Yes	Yes	No

27	Yes	[redacted]			Planning Consultant	AddisonRees Planning Consultancy Ltd	No	-	Worcester City	Individual	-	No	Yes.	No	CIL Viability Report Dec 2025 (Aspinall Verdi): Recommendations – para 10.3 - Small schemes of <10 units should easily be able to contribute these CIL rates as they have no affordable housing, but this is subject to the Written Ministerial Statement (WMS) of 19 February 2024, which makes it clear that charging authorities should not apply higher CIL rates to non-major residential development on the basis that these schemes are not required to deliver affordable housing. This is to not undermine the objective of the Government's small sites policy, which is intended to support SME developers and improve housing delivery on minor sites. This is fundamentally incorrect. Almost all of Wychavon and Malvern Hills districts are designated rural areas, where affordable housing contributions are payable on even a single dwelling. The recommendations of this report which the proposed CIL increase are based on, is fundamentally incorrect. Sites of 1-9 dwellings in all villages in Wychavon and Malvern have to contribute to affordable housing, either through an off site contribution of £12,797 per unit for schemes of 1-4 dwellings, or on-site provision for schemes of 5-9 dwellings.	Proposed changes to more than double the CIL costs for small-medium developers exclusively. On Greenfield Sites, the charge is going from currently £54.70 per sq.m (risen with inflation from original £40 per sq.m charge) to £120 per sq.m for sites of 1-9 units As an example, today a scheme of 4 x 250sq.m houses would pay a CIL charge of £54,700. Under the proposed CIL charges, this same scheme would now have to pay £120,000. However, on sites of 10-49 units on Greenfield land, the CIL charges stay at current levels, no proposed increase for these larger schemes. Housing on Brownfield sites are current £0 CIL. But now proposed at £120 per sq.m just for small sites of 1-9 units, any major scheme for 10no. units + (typically the national housebuilders) would still be £0.	The council's have not been spending the millions of CIL monies they have been collecting over the past 8 and half years. Infrastructure Funding Statement – Wychavon 2024/25 Main Headlines from the IFS In 2024/25 the headline figures are: Community Infrastructure Levy a. ?642,288.22 collected in total. b. ?239,152.57 of which is allocated to parishes for their share. c. No CIL had been allocated or spent in previous years and none identified in 2024/25. Of the three South Worcestershire Councils, Wychavon and Malvern Districts have not yet spent any Community Infrastructure Levy (CIL) monies collected to date. However, Worcester City has utilised its CIL receipts, spending £144,000 during the 2024/25 monitoring year. Overall, the amount of CIL estimated to be collected from development in accordance with the adopted SWDP is judged to be approximately £6 million over the entire plan period. So only Worcester City Council have spent a small portion of their collected CIL within the past 12 months. Wychavon and Malvern Hills council have not spent any of the CIL since adopted in 2017. Over £6 million in collected CIL monies not spent in almost 9 years. So going back to the previous example, a scheme of 4no. dwellings of 250sq.m each, would now have to pay £120,000 CIL contributions and £51,188 affordable housing contribution. How is such a scheme going to be viable with a £170k outlay before work commences? What local infrastructure requirements are reasonably necessary for a scheme of 4no. dwellings to have to pay £120,000? As taken from the Planning Practice Guidance: The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. – Paragraph: 001 Reference ID: 25-001-20190901. As the councils' own reports confirm, the CIL monies to date have not been used to deliver any infrastructure, that is still being done solely with Section 106 contributions. When deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the	Yes	Yes	Yes	No

																	viability of developments. - Paragraph: 010 Reference ID: 25-010-20190901. Therefore, when setting and revising CIL rates, charging authorities should consider the impact of such rates on small and medium sized developers. Rate setting in this context must be considered alongside the small sites policy and its aim to support small and medium sized developers particularly. As set out in the Written Ministerial Statement of 19 February 2024, higher residential CIL rates should not be set for developments which are not major developments on the grounds that these sites are not required to provide affordable housing contributions, because doing so erodes the underlying policy objective of the small sites policy. - Paragraph: 024 Reference ID: 25-024-20240219. The proposals run entirely contrary to this, incorrectly claiming that small sites within Wychavon and Malvern Hills are not liable for affordable housing provision when they are, and then setting higher CIL rates for smaller sites, but not larger sites. In conclusion, the proposals are based on fundamentally incorrect assumptions about smaller schemes not contributing to affordable housing and therefore being able to afford significant increases in CIL. How has the council not spotted this fundamental error? This is not only entirely contrary to national guidance, but would put almost all small housebuilders out of business, as schemes of 1-9 units would be entirely unviable. So there would be no more windfall sites coming forward, and significant local redundancies in local developers, trades, suppliers etc. National housebuilders do not support the local economy. Clearly CIL is not needed at all, given that the council's have not spent the over £6 million they've collected over the past 8 and half years. No infrastructure local to the developers has been provided or improved. This is just a tax on small developers which will put them out of business, and is completely short-sighted and unjustified.				

28	Yes	[redacted]			Director	DJD Architects	No	-	Worcester City	Business	-	No	We disagree with "Recommendations – para 10.3 - Small schemes of <10 units should easily be able to contribute these CIL rates as they have no affordable housing, but this is subject to the Written Ministerial Statement (WMS) of 19 February 2024, which makes it clear that charging authorities should not apply higher CIL rates to non-major residential development on the basis that these schemes are not required to deliver affordable housing. This is to not undermine the objective of the Government's small sites policy, which is intended to support SME developers and improve housing delivery on minor sites." This is fundamentally incorrect. Almost all of Wychavon and Malvern Hills districts are designated rural areas, where affordable housing contributions are payable on even a single dwelling. The recommendations of this report which the proposed CIL increase are based on, is fundamentally incorrect. Sites of 1-9 dwellings in all villages in Wychavon and Malvern have to contribute to affordable housing, either through an off site contribution of £12,797 per unit for schemes of 1-4 dwellings, or on-site provision for schemes of 5-9 dwellings.	No	See above	The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. – Paragraph: 001 Reference ID: 25-001-20190901. As the LPA's own reports confirm, CIL monies to date have not been used to deliver any infrastructure, that is still being done solely with Section 106 contributions. When deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. - Paragraph: 010 Reference ID: 25-010-20190901. Therefore, when setting and revising CIL rates, charging authorities should consider the impact of such rates on small and medium sized developers. Rate setting in this context must be considered alongside the small sites policy and its aim to support small and medium sized developers particularly. As set out in the Written Ministerial Statement of 19 February 2024, higher residential CIL rates should not be set for developments which are not major developments on the grounds that these sites are not required to provide affordable housing contributions, because doing so erodes the underlying policy objective of the small sites policy. - Paragraph: 024 Reference ID: 25-024-20240219. The proposals run entirely contrary to this, incorrectly claiming that small sites within Wychavon and Malvern Hills are not liable for affordable housing provision when they are, and then setting higher CIL rates for smaller sites, but not larger sites. Removing the zero rating for highly sustainable locations further disincentives location of development in the most sustainable locations and will be a significant barrier to development at a time of increasing viability pressures. These proposed rates are only likely to result in viability appraisals being able to demonstrate lack of viability with affordable housing and a massive reduction in affordable housing provision.	-	Yes	Yes	Yes	No

29	Yes	[redacted]			-	-	No	-	Wychavon	Individual	-	Yes	-	Yes	-	-	-	Yes	Yes	Yes	No

30	Yes	[redacted]			Parish Clerk	Whittington Parish Council	No	-	Wychavon	Organisation	Whittington Parish Council	Yes	-	Yes	-	See Q10.	Response to the Draft Community Infrastructure Levy (CIL) Charging Schedule Consultation 2026 Accessibility of the Consultation Documents The consultation document is highly technical and difficult for a layperson to understand. It relies heavily on jargon and acronyms, many of which are not clearly explained. Parish councils are largely run by volunteers without specialist planning expertise. Consultation materials should therefore be accessible and clearly explain how the proposals affect local communities. The document would have benefited from a plain-English summary and practical examples showing how CIL will operate. Without these, it is difficult for parish councillors to confidently identify the key implications of the policy and represent their communities effectively. Disadvantage to Parish Councils Without a Neighbourhood Plan The proposed arrangements appear to significantly disadvantage parish councils without a Neighbourhood Development Plan, as parishes with an NDP receive 25% of CIL, whereas those without receive just 15%. Many smaller parish councils do not have the resources or capacity to prepare a neighbourhood plan (at least a two-year commitment). No advance notice appears to have been given that the introduction of CIL would create this disparity in funding. Consideration should therefore be given to transitional arrangements, additional support for neighbourhood planning, or mechanisms to ensure that parishes most affected by development are not disadvantaged. It is patently unfair that Whittington, one of the parishes most impacted by the Wychavon Town proposals will receive far less CIL funding than other parishes with more modest impacts. Allocation and management of CIL Funding Greater clarity is required regarding how CIL funds will be allocated and managed. In particular: • How will the South Worcestershire councils ensure that CIL generated by development is spent on infrastructure related to the communities affected by that development? • Can other areas or authorities access CIL funding generated locally? • How will decisions be made about which projects are prioritised? • When do developer contributions actually become available? • How and when can parish councils	Yes	Yes	Yes	No

																	apply for funding? • Who decides which projects are funded and when? For communities directly affected by development, it is important that funding generated locally is used to mitigate local impacts. A clear and simple guide explaining the process for parish councils would be very helpful. In relation to Whittington parish specifically, CIL funding should therefore support local measures such as green buffers between residential areas (Pershore Road) and new commercial development, as well as community green space and recreational facilities. Infrastructure Delivery and Consistency There appear to be inconsistencies between different consultation materials. For example, references to early delivery of the proposed Boulevard appear to conflict with other consultation information suggesting development of the Pershore Road area may not occur for many years. The supporting 'Worcestershire Parkway Infrastructure Delivery Plan 2024' also identifies significant infrastructure constraints, including limited water management capacity that must be addressed before development begins. However, there is currently little detail on how this infrastructure will be delivered. Conclusion While the principle of using CIL to fund infrastructure is supported, the current consultation raises several concerns regarding accessibility, fairness for parish councils, transparency and the clarity of infrastructure delivery plans. Whittington Parish Council would urge stronger safeguards to be put in place for existing local communities and to strengthen the allocations made to parishes most affected by development.				

31	Yes	[redacted]			Droitwich East Councillor	Representing all Green Councillors on Wychavon District Council	No	-	Wychavon	Organisation	Wychavon Green District Councillors	Yes	-	-	-	There should be no situation where Greenfield is the same as Brownfield, such as 'Housing Greenfield (10-49 units)' where it stays at £54.70 as this makes up a huge section of developments and should be increased to £120/sqm. Brownfield should still be increased to the £54.70 for the same sized developments and other sizes as well. We also take exception to Build to Rent Accommodation being set at £0 as this should be separated into two categories where Social Rent properties for Councils and HAs should remain at £0, but any private Build to Rent should be charged at £120/sqm, otherwise it looks like a tax dodge for those who are buying up housing for personal gain.'	Councillors should have had a meeting with the Authors of the document to go through and discuss it with them, and ask questions. Why did this not happen? The documents are large and we are not experts, so not sure how we are supposed to know if it is all legal or not. That should be a question for the Council Legal Department.	Yes	Yes	Yes	Yes
32	Yes	[redacted]			Director	Wychbury Developments Ltd	Yes	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Please note that respondents 18 and 22 did not consent for the information they provided to be shared. Their comments have still been considered as part of the CIL Charging Schedule Review.