



GREENLIGHT DEVELOPMENTS

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

Date: 16th May 2016

Dear Sirs,

Re: Community Infrastructure Levy – Draft Charging Schedule Consultation (1st April to 16th May 2016) - Response

These representations (by Greenlight Developments Ltd) relate solely to the Regulation 123 List (Appendix A) of the CIL Draft Charging Schedule (April 2016), which sets out how the South Worcestershire Councils will seek to use the CIL Charging Schedule alongside conventional S106 Planning Obligations.

For the purpose of this response we have used as an example the existing situation in one of the South Worcestershire Councils - Malvern Hills, where the following S106 Planning Obligations are being sought from developments:

- Affordable Housing
- Highway Infrastructure Contribution
- Education Contribution
- Recreation Contribution

With the inception of the CIL Charging Schedule, Appendix A adds a raft of further obligations onto developments. From our reading of the Schedule these include:

- *Open Space / Green Infrastructure* – strategic (off site) open space / green infrastructure, including parks and open spaces, local green network, biodiversity protection / enhancements and water quality projects.
- *Sport and Recreation* – strategic provision of built leisure and other sports facilities.
- *Flood Mitigation Measures* – strategic flood defences / mitigation required to support development across the area + Flood Warning Service provision (maintenance, forecasting, warning and modelling).
- *Community and Cultural Facilities* – strategic provision of community and cultural facilities such as leisure centres, libraries and cultural facilities.



GREENLIGHT DEVELOPMENTS

- *Emergency Services* – strategic provision of police service infrastructure to support development growth + strategic provision of fire and rescue infrastructure to support development growth + strategic provision of ambulance services and other emergency care infrastructure to support development growth, carried out in consultation with the Clinical Commissioning Group for South Worcestershire.
- *Health Facilities* – strategic provision of health facilities and related infrastructure to support development growth, carried out in consultation with the Clinical Commissioning Group for South Worcestershire.

It would appear that the CIL Charging Schedule now covers the education and highway infrastructure contributions (currently S106 Planning Obligations); however, the recreation contribution will be collected via both mechanisms (S106 and CIL), and further contributions (an extensive list, as set out above) over and above what is currently being sought from developments.

On this basis, it is essential that a landowner or developer understands the level of contribution being sought from the S106 Planning Obligations (notably the recreation contribution which appears to be split between S106 and CIL) to be collected alongside the CIL Charging Schedule, in order to understand the viability of the overall Planning Obligations package being sought from developments, which in turn will inform the decision as to whether land can be brought forward for development. This, as the Councils will appreciate, will influence the deliverability of sites, particularly in the rural areas of the Districts; and it is Greenlight Developments opinion that without seeing the whole picture (both the envisaged S106 Planning Obligations and the CIL Charging Schedule) to understand whether developments going forward can sustain these levels of financial contribution (alongside a 40% affordable housing contribution).

Yours sincerely

Philip Rawle BSc(Hons) MA DipTP MRTPI
Director

Cc Kevin Foreman – Bridgehouse Property Consultants Ltd