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22nd May 2026

Dear Sir/Madam,

Re: Community Infrastructure Levy draft charging schedule consultation

This letter is submitted by Gladman Developments Ltd (Gladman) in response to the consultation on the Community Infrastructure Levy draft charging schedule consultation prepared by Buckinghamshire Council.

Gladman welcomes the proposed approach to exempting strategic-scale developments from CIL liability through the application of the 400+ dwelling/10-hectare land threshold. This represents the proportionate and justified approach which appropriately recognises the distinct infrastructure requirements and delivery mechanisms associated with strategic development sites. The proposed approach also reflects the established position within the former Chiltern and South Bucks administrative areas, thereby promoting consistency across the wider Buckinghamshire authority area.

Strategic residential developments are typically required to deliver significant infrastructure and mitigation measures directly through Section 106 obligations, including, but not limited to, education provision, highways and transport improvements, sustainable drainage infrastructure, public open space, community facilities, environmental mitigation and policy-compliant levels of affordable housing. In this context, Section 106 agreements remain the most appropriate and effective mechanism through which to secure infrastructure delivery that is directly related and proportionate to a proposed development.

Gladman considers that the application of both substantial Section 106 obligations and CIL charges to strategic-scale developments would risk placing an excessive burden on development, with the potential to adversely impact scheme viability, delay delivery and ultimately undermine the Council's ability to achieve the housing and infrastructure objectives of the emerging Buckinghamshire Local Plan. The proposed exemption threshold therefore

represents a pragmatic and balanced approach which supports the continued delivery of sustainable strategic growth across the county.

Gladman supports the consistency that the proposed approach would bring by aligning the North and Central Buckinghamshire charging areas with the existing East and South Buckinghamshire CIL Charging Schedule, under which strategic development exceeding 400 dwellings or 10 hectares are already exempt from CIL liability. A consistent county-wide approach will provide greater clarity and certainty for applicants, landowners, infrastructure providers and decision-makers, whilst supporting the effective long-term planning and delivery of strategic sites.

Overall, Gladman supports the proposed strategic site exemption and considers the 400+/10 hectares threshold to represent a justified and pragmatic approach. The proposed exemption appropriately reflects the significant infrastructure and planning obligations already secured through Section 106 agreements and will support the continued delivery of strategic growth across Buckinghamshire.

Yours faithfully,

[redacted]

Senior Planner

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22nd May 2026

Submitted by email CILNorthConsultation@buckinghamshire.gov.uk

Dear Sir or Madam,

Re: Buckinghamshire Community Infrastructure Levy Draft Charging Schedule Consultation

Introduction:
We write in relation to land at Manor Farm, Whitchurch. The site has been allocated as a reserve site for the delivery of 35 homes in the Whitchurch Neighbourhood plan, made in June 2024.

The suitability of the site has also been considered as part of the 2026 HELAA, produced in support of the emerging Buckinghamshire Local Plan. Within the HELAA the site is deemed suitable for housing, and 35 homes have been included within the potential supply figures to meet the Local Plan housing requirement.

Having reviewed the consultation documents, we consider the introduction of CIL would impact the viability of this and other sites in the district. This submission sets out our concerns with the draft charging schedule having considered the following documents:

- Statement of Representation
- Charging Schedule and Map
- Draft Installment Policy BC all areas
- Charging Zone Map
- Dixon Searle CIL report and appendices 1-5
- Infrastructure Funding statement and appendices 1-5
- 2017 Infrastructure Delivery Plan and appendix

Dixon Searle Partnership (DSP) were commissioned to work with Buckinghamshire Council (BC) to explore options for collecting infrastructure contributions and whether the areas of Buckinghamshire not covered by CIL would benefit from a charging schedule. We set out our concerns with some of the baseline assumptions made within the assessment and the resulting rates set out in the proposed charging

schedule, which we suggest are unsustainable. We also explain why the adoption of CIL is premature and how emerging policy changes may impact the delivery of allocated housing.

Planning Policy

In the introduction of their report at point 26, DSP confirm that their assessments have been undertaken within the context of the Vale of Aylesbury Local Plan (VALP), taking into account adopted policies together with standards and requirements, both local and national, such as affordable housing.

It is typical for CIL to be assessed against the current policy position, but given recent material changes within Buckinghamshire since the adoption of the VALP, we feel that the assessment is premature and has the potential to create viability issues that would constrain future development and impact the deliverability of the emerging Local Plan.

The VALP is currently less than 5 years old, being adopted in September 2021. However, a new Local Plan for the newly formed Buckinghamshire Council is being progressed with a Reg 18 consultation having taken place between September and October 2025. More recently MHCLG sent an intervention letter to Buckinghamshire Council in February 2026 directing BC to submit their plan for examination by 31st December 2026

In December 2024 a new standard method saw the housing requirement for Buckinghamshire increase from 2,912 homes pa to 4,319 homes pa. This is a significant increase, which is now a material consideration for both decision making and plan making. As a result, the emerging Local Plan is proposing to identify the supply of 95,000 homes over the plan period. Therefore, the housing requirement set out in the VALP from which the CIL assessment is made is not up to date.

Furthermore, proposed development policies in the emerging Local Plan differ significantly from the VALP. We note the following matters as examples, but note this is not an exhaustive list:

Affordable Housing

The DSP viability appraisals assume a VALP compliant 25% affordable housing requirement. However, the emerging local plan sets a requirement of 40%. The emerging local plan also requires on site affordable housing on sites for 10 or more or on sites greater than 0.5ha. In comparison the VALP threshold is for sites of 11 or more homes or with an area of 0.3ha or more.

The implication here is that CIL rates based on viabilities assuming 25% affordable housing, will immediately impact the viability of housing sites being delivered under the new local plan. Once 40% affordable housing is adopted, CIL rates will no longer be affordable, thus compromising the delivery of the plan and the supply of new homes.

The emerging Local Plan is also proposing 50% affordable housing to be delivered on Green Belt sites, which would conform with the current NPPF. Some parts of the North and Central area are designated Green Belt and would already be subject to a 50% affordable housing requirement, not 25%. This is current policy, not emerging.

Furthermore, the tenure split assumed by DSP is 80% social rent and 20% intermediate. This is taken from the 2024 Technical Note, based on the 2016 HEDNA. We note that the emerging Local Plan assumes minimum 60% social rent, 20% affordable rent and 20% intermediate, based on the more relevant 2025 LHNA.

As with the quantum of affordable housing, CIL rates based on out-of-date tenure requirements has the potential to impact the viability of deliverable sites if adopted now.

Accessible Homes
VALP requires 15% of affordable homes to be M4(3) wheelchair accessible housing. In comparison the emerging Local Plan requires 30% to be M4(3) compliant. In addition, 20% of market homes must also be M4 (3) compliant.

The additional requirements being proposed by the emerging local plan would impact build costs for both market and affordable housing. Therefore, the assumptions made by DSP are out of date, thus skewing CIL rates.

We acknowledge that it is typical for CIL assessments to be undertaken within the context of current local planning policy and note that the emerging local plan is at an early stage and therefore cannot be relied upon for decision making. However, the VALP is not a newly made document. Later this year it will be more than 5 years old and its policies are based on a HEDNA from 2016.

Given the recent government intervention, the plan is likely to be expedited through 2026. Therefore, a newly adopted CIL based on out of date assumptions could immediately conflict with the new plan policies, resulting in new sites across the North and Central areas being unviable and undeliverable.

We strongly suggest that the adoption of CIL is premature and recommend this is paused until the emerging Local Plan can be assessed. West Oxfordshire DC (WODC) adopted their CIL Charging schedule on 31st January 2026. DSP have now been asked by WODC to undertake a viability assessment to inform and support the spatial strategy for their emerging Local Plan.

> *'The assessment will be conducted considering the Council's emerging Local Plan policies, with the potential influence of those considered alongside typical development costs (build and associated works costs, fees, finance etc.) so that the cumulative impact of policy and development costs can be considered.'*

Whilst this viability assessment is not in relation to CIL, the assessment considers local plan policies alongside development costs. BC will need to undertake a similar assessment for their emerging local plan and given the overlap with CIL assessment considerations, we suggest that this would be a more appropriate time to undertake the CIL assessment. A coordinated viability assessment will ensure that relevant planning policies are considered along with up to date financial assumptions. Currently the BC CIL assessment is based on the evidence base from the VALP examination, which for some documents dates back to 2016 / 2017.

Should the examiner conclude that CIL should proceed, we further suggest that sites already allocated within made Neighbourhood Plan's under current policy be exempt from CIL. This will prevent allocated sites being constrained by viability considerations created by imposing unsustainable CIL rates based on out of date assumptions. As set out above, an example of this would be imposing CIL rates based on 25% affordable housing requirement, where new policy requires 40% affordable housing. Any constraint to the delivery of allocated housing sites, ,would impact the delivery of the spatial strategy and compromise the supply of new homes.

DSP Assessment Assumptions

1. Densities & Site Areas

Medium Sites

The site at Manor Farm, Whitchurch (OPUS 64) comprises a green field and extends to c1.92 ha. Following extensive consultation and promotion the site has been allocated within the made Whitchurch Neighbourhood Plan for around 35 homes. The 2026 HELAA has also assumed the delivery of 35 homes within the supply figures for the emerging Local Plan.

As dictated by policy, the site will include areas of public open space and on site habitats to deliver 10% BNG. Due to site specific constraints and Neighbourhood Plan policies, the site will also deliver significant areas of landscaping to enhance its natural boundaries. This is typical for greenfield sites, on the edge of settlements, where on-site mitigation is required to ensure the site compliments the existing character of the settlement and provides a transition towards the existing countryside.

The site, as allocated would deliver a density of 18.23 dwellings per ha (gross), which has been deemed appropriate by the Neighbourhood Plan and the HELAA assessments.

Appendix 2 of the DSP report includes residential typology results, with viability assessments covering a range of site sizes for greenfield sites. Within this document, a greenfield site for 11 houses assumes a density of 35dwph based on the net site area. Alternatively a greenfield site or 50 homes (houses and flats) assumes a density of 40dwph. It should be noted that the typologies assume that sites over 11 homes will be a mix of houses and flats and there are no examples of medium sized housing only schemes, which is a significant omission. We assume that all housing sites above 11 would be assessed at 35dwph.

An extract of appendix 1, Table 1a is shown below.

Typology Sensitivity Tests

Scheme Size Appraised	Type	Site Type	Density (dph)	Net Land area (ha)	Green infrastructure/open space provision (ha)	Gross Land Area (ha)	Main Build Period (Months)
5	Houses	PDL / GF	35	0.14	N/A	0.16	6
9	Houses	PDL / GF	35	0.26	0.04	0.33	12
11	Houses	GF	35	0.31	0.04	0.40	12
11	Houses	PDL	35	0.31	0.04	0.40	12
20	Flats	PDL	135	0.15	0.07	0.24	15
30	Mixed (Houses/Flats)	PDL	55	0.55	0.11	0.73	18
50	Mixed (Houses/Flats)	GF	40	1.25	0.18	1.61	18
50	Mixed (Houses/Flats)	PDL	55	0.91	0.18	1.22	18
100	Mixed (Houses/Flats)	GF	40	2.50	0.35	3.60	24
Potential larger-scale strategic site typologies							
550	Mixed (Houses/Flats)	GF	40	13.75	included within assumed gross land area	82.00	40*
600	Mixed (Houses/Flats)	GF	40	15.00		40.00	40*
800	Mixed (Houses/Flats)	GF	40	20.00		55.00	80*
875	Mixed (Houses/Flats)	GF	40	21.88		85.00	80*
900	Mixed (Houses/Flats)	GF	40	22.50		100.00	80*

**Assumes multiple sales outlets*

Firstly, we note that the typologies assume very small variances between net and gross areas. Notes provided for Table 1a (above) confirms the following allowances:

> *Assumed net developable to gross land area adjustment - 15% added (30% added on largest sites 100+) before adding for OS provision allowance*

We assume the 15% is to allow for incidental space, access roads, etc, with an allowance for open space and green infrastructure listed separately within column 6 of the table. The typology for a greenfield of 50 dwellings (houses and flats) shows a difference of 0.36ha gross to net (23% of gross area). As shown in the table, 0.18ha is for green infrastructure, with the balance presumably reflecting the 15% (although it is nearer 12%).

We argue that given planning policy requirements, not enough space is assumed for POS and green infrastructure. Within the VALP, policies L1 Green Infrastructure and L2 sport and recreation set out requirements for accessible green space and recreation facilities for sites of 10 units or more. In addition, Policy L4 requires utilization of sustainable drainage systems and national policy requires all sites over 0.2ha to provide a minimum 10 net gain in Biodiversity, preferably through on-site habitat creation. Greenfield sites are typically located on the edge of settlements, with a semi urban / rural character. The sensitive location of these sites typically necessitates additional landscape requirements, particularly if located in the Green Belt.

Government policy requires 10% BNG on housing sites over 0.2ha. It is also widely acknowledged that the provision of 10% BNG disproportionately impacts small and medium sites. It is not clear that sufficient adjustment has been made to net developable areas to facilitate on site BNG provisions.

Given the above, on a site of 50 dwellings it is unlikely these policy requirements could be met within the 0.18ha identified for green infrastructure.

In the case of Manor Farm, a scheme will be required to provide onsite BNG, POS, LAP and SUDs. The site is located within an area of Attractive Landscape and therefore additional site specific landscape buffers for localized mitigation and retention of existing trees and hedgerows are required. We argue that 0.18ha is not sufficient to meet all infrastructure requirements.

Secondly, we highlight inconsistencies with densities assumed in the typologies and those actually being delivered on approved sites in the North and Central area.

In order to illustrate this, we have listed some examples of recently consented sites within the North & Central area. A simple comparison illustrates that the gross site areas required for these sites is significantly higher than those assumed in DSP table 1a. This risks incorrect land value assumptions, if smaller areas are assumed, when larger land parcels will need to be acquired.

For further analysis, we have applied net areas to the sites below calculated by applying the DSP ratios for adjusting areas from gross to net.

Site Location	Planning Reference	Unit Numbers	Type	Actual Gross Area (ha)	Percentage Adjustment based on DSP rates (table 1a)	Assumed Net Area (ha)	Assumed Net Density (dph)
St John's Drive, Stone	24/03615/ APP	15	PDL – Houses	0.847	0.20 (23% of gross)	0.65	23.08
Creslow Way, Stone	23/02299/ APP	45	GF - Houses	5.19	1.2 (23%)	3.99	11.28
Churchway Haddenham	23/00311/ AOP	89	GF - Houses	4.92	1.14 (23%)	3.78	23.55

NB: Please note the area adjustment is based on the DSP Table 1a. For the greenfield sites we have assume a reduction of 23%, which represents the difference between net and gross for a 50 unit and 11 unit green field site.

For the PDL site 23% is the difference for the 11 unit PDL housing example.

Based upon DSP assumptions on site areas, a density of 35dwph (net) at Churchway, Haddenham would deliver 132 homes. This is an increase of nearly 50% and would not be appropriate for this site.

Therefore, assuming 89 homes is the right density for this site, based on an assumption of 35dpha, the net area for this site would be 2.55hectares, which is 1.23ha smaller than assumed by DSP adjustments. This demonstrates that the assumptions on densities are too high and that the amount of land required for on-site green infrastructure is actually greater than anticipated in the DSP appraisals.

We can also apply these principles to Manor Farm, Whitchurch. Applying a 23% reduction from the gross site area gives a net area of 1.47ha. At 35dph a scheme of 51.45 homes would be assumed. This site has been assessed as part of the NP examination and the 2022 HELAA. The increased development assumed by the DSP figures is not suitable for the site and again highlights that the assumptions being used to calculate CIL figures are not realistic.

We also note that in the 2026 HELAA, BC have applied a density of 20dph for Manor Farm, Whitchurch. Furthermore, there are numerous sites in the 2026 HELAA included within the potential supply figures, where density assumptions are below 35dph. A small list of examples are listed below, but this is far from being a complete list:

- Land off Lee Road, Quainton – 30dph
- Clements Land, Marsh Gibbon – 30dph
- Rookery Road, Granborough – 30dph
- Gib Lane, Bierton – 30dph

(Source: Buckinghamshire site engagement as of 16.03.26 Buckinghamshire Local Plan - Sites Engagement. As of 16.03.2026 subject to change)

The above demonstrates an inconsistency between the assumptions made by DSP in their CIL assessment and those by BC for site allocation and delivery. Over inflated densities risk over inflated affordability levels and CIL rates being set unsustainably high at £200/sqm, compromising the deliverability of much needed housing.

It is suggested that the discrepancies around densities and site areas within the DSP report are due to both below realistic assumptions for on-site infrastructure requirements and above realistic assumptions on density. Particularly, given there are no typology examples of housing only sites above 11 homes.

Small Sites 1-9 houses
We also question the use of 35dph for smaller sites of 1-11 homes and we refer to the following sites as examples –

Site Location	**Planning Reference**	**Unit Numbers**	**Type**	**Actual Gross Area (ha)**	**Percentage Adjustment based on DSP table rates 1a**	**Assumed Net Area (ha)**	**Assumed Net Density (dph)**
Land South of Bicester Road, Twyford	21/01692/PIP	9	GF - Housing	0.475	0.11 (22%)	0.37	24.33
Land North of Mursley Road, Little Horwood	25/00199/APP	9	GF - Housing	0.42	0.10 (23%)	0.32	28.13
Land opposite Twyford Manor, Twyford	25/5662/PIP	1-4 (assume 4)	GF - Housing	0.28	0.04 (13%)	0.24	16.67
Towcester Road, Maids Moreton	25/00705/PIP	1-9 (assume 9)	GF – Housing	0.74	0.17 (23%)	0.57	15.79

(NB: The table uses net to gross adjustment rates from DSP table 1a for 5 and 9 unit green field sites).

In relation to small sites of 1-9 homes, the above list represents real examples of schemes that have been recently approved in the North & Central area. The sites are for the delivery of between 1 and 9 homes on greenfield sites and using DSP's assumptions have densities between 28.13dph and 15.79dph. These are in stark contrast to the DSP typologies, which assume densities of 35dph on small sites of this size.

As above, the use of high densities result in over inflated GDV's, which are used to determine the affordability of these sites. DSP propose a rate of £250/m2 for sites of 1-9 homes. Given, the above evidence, this rate is considered unsustainable.

As with medium sites. we suggest that the net area for small sites is too high as a percentage of the gross areas, as supported by the above examples.

As discussed later in relation to costs assumptions, BNG is not assumed to be required on sites below 10 dwellings. However, the most recent policy changes require BNG on sites of 0.2ha or more. As illustrated above, small sites are often delivered on sites of over 0.2ha. Firstly, this again highlights that the gross site areas assumed for small sites is too low. Secondly, given DSP have not applied BNG to small sites, the net areas will be too high compared to the gross and the resulting assumed site sizes are incorrect.

We suggest that lower densities are applied, which are consistent with BC assumptions and that are suitable for edge of settlement locations. We also suggest DSP look at how much green infrastructure is actually required for on-site and that they adjust their gross site areas in line with examples provided herein and increase the reductions assumed to achieve realistic net developable areas. Having typologies for housing only sites for 11+ homes may assist with this.

2. Affordable Housing

At 1.3.7 of the report, DSP note NPPF requirements that authorities should not seek affordable housing contributions from residential developments that are not major developments (10 homes or more or 0.5ha or more).

However, the VALP requires the delivery of 25% affordable housing on sites of 11 or more, or on sites of 0.3ha or greater. As the VALP is less than 5 years old, policy H1 of the VALP is still being applied as intended and decision making on affordable housing has not reverted to the NPPF

Three of the four small sites in the table above have a requirement to deliver on site affordable housing. These are:

Land South of Bicester Road, Twyford.

- Affordable housing provision – 25% (2.25No.)

Land North of Mursley Road, Little Horwood

- Affordable housing provision – 25% (3 homes provided)

Towcester Road, Maids Moreton

- Affordable housing provision – 25% (2.25No.).

Presumably the CIL rate for small sites is being set £50/sqm higher than the rate for larger greenfield sites, due to the assumed absence of affordable housing and thus, the additional headroom for a higher CIL rate. As can be seen from the above, this is not correct and affordable housing should be applied on smaller sites.

Small sites, such as those listed above, have potential to contribute to housing supply at a time when Buckinghamshire council cannot demonstrate a 5 year housing land supply. In particular, PIP applications can speed up the delivery of small sites, where unconstrained. However, the assumption that these sites will not require affordable housing is contrary to the VALP and has the potential to significantly impact viability and deliverability at a time of increasing need.

3. Residential GDV Assessment

At 2.5.1 of the report, DSP list sources of their data collection, including viability studies supporting the adopted VALP.

At 2.5.7 of the report DSP state:

> *Although in real terms, values have increased across the area, in terms of the relative picture, our research broadly aligned with the review of values and data within previous viability studies supporting the adopted VALP. On this basis we have applied assumed property "Value Levels" (VLs) to each typology tested from VL1 (lowest) to VL11 (highest). These VLs reflect an overall range between £4,000 per sq. metre to £5,200 per sq. metre, representative of varying new-build sale prices likely to be seen for typical new buildings according to general location in the N&CB area.*

This is a very broad statement and the evidence to support this does not appear to have been included within the documents available in this consultation. We also highlight that viability is not just about house prices, but also affordability, availability of finance, interest rates, borrowing cost, market confidence and activity.

It should be noted that the VALP was adopted in September 2021. The supporting viability assessment was produced in 2017, with an addendum in 2018 responding to examination points. However. we have been unable to review the viability assessment that accompanied the VALP as the documents have been removed from the council's website.

The date of the evidence base raises questions over the comparability of the results with today's market, particularly in light of recent changes. In 2017 interest rate were 0.75%. They were held at this rate until

2020 when they fell to 0.01%. As a result, the average mortgage rate for a 5 year fixed deal in 2017 was 2.70%[1].

In contrast, interest rates in April 2026 have been held at 3.75% with warnings of likely increases later in the year (possibly 6 before the end of 2026) depending on the conflict in the Middle East. This has resulted in average mortgage rates rising in 2026 from 4.95% to 5.75% for a 5 year fixed rate. Purple Bricks note an annual change in average house prices in the south east of -0.9% and a decrease in buyer activity nationally down by -5.6%[2].

At paragraph 2.5.15, the report states –

> *Mortgage affordability has continued to improve, which should support house price growth. Several lenders have reduced mortgage interest rates, pricing in an increased likelihood that the Bank of England will implement a further base rate cut on 18th December as inflationary pressures ease.*

At 2.5.18 they go on to say –

> *So for the south east of England region; house price growth of around 17.0% is forecast overall across the 5-year period to end 2030. For the region, very modest growth (house price change just on the positive side of flat) is forecast in 2026, with the growth rate indicated to pick up to a fairly constant and longer term trend type level in the following years.*

Paragraph 2.5.12 confirms the report was written in November 2025, during which a period of stability had been experienced in the housing market. However, currently in April / May 2026 we know that the above statements are not correct. Instead Inflation has risen to 3.3%, interest rates are not being cut, and mortgage rates are rising.

Impacts from the middle east conflict as illustrated above such as the tightening of mortgage credit in response to interest rate rises is slowing activity within the market. The impact of reduced demand is already having a negative impact on prices, before the real impacts of the conflict are realized. We therefore suggest caution is taken when reviewing land values for the region based on outdated data and predictions and that GDV assumptions should be updated in light of ongoing events.

4. Cost Assumptions

Outdated Assumptions

As noted above, the report was written in November 2025 and therefore cost assumptions do not reflect the recent dramatic increases in build costs, the volatility of abnormal costs due to increasing inflation rates and the current fuel crisis. As with GDV assumptions, we suggest build cost assumptions are reviewed to reflect current and ongoing cost inflation and are not based on outdated BCIS figures. Based

[1] History of Mortgage Interest Rates UK - Mortgageable

[2] UK House Price Index Update: April 2026

on current assumptions, proposed CIL rates are unsustainable and will compromise the deliverability of growth plans in the emerging Local Plan.

Biodiversity Net Gain
Table 1b of appendix 1 notes that BNG has only been applied to sites of 10 + homes. However, this is incorrect. Latest policy changes exempt sites of less than 0.2ha, but as demonstrated above and in the site sizes used in the appendix 2 typologies, sites for 1-9 homes are likely to be on sites over 0.2hectares and therefore BNG costs need to be factored into small sites. This again raises questions over the viability of £250/sqm for smaller sites.

Surface Water Drainage
There is no clear evidence that cost assumptions include consideration of the new standards for SUDs that were introduced in July 2025. These changes will impact the costs associated with new housing developments and the area of land required for the provision of SUDs.

Finance
Standard assumptions for finance rates have been included for funding build and land. However, these rates should be reconsidered in light of interest rate rises, which has seen an increase in borrowing costs over recent years. Rates of 6.5% are unlikely to be achievable in the current climate.

Developer Margin
We also consider the assumptions for Developer's profit return to be outdated. The minimum profit margin lenders will accept is 20% on GDV. This level of profit was accepted in recent CIL assessments for South Oxfordshire (2022) and West Oxfordshire (2025/26). Viabilities based on DSP's assumption of 17.5% is not realistic and financial difficulties highlighted above, in terms of increasing inflation and interest rates which tighten lending criteria, do not justify margins less than 20%.

Overall, the above demonstrates that cost appraisal assumptions are incorrect and not based on up to date market indicators. We suggest that these assumptions are reviewed.

Charging Schedule
We have already highlighted concerns with the rates for greenfield sites based on unrealistic density assumptions. In the Charging schedule the rates for greenfield sites are significantly higher than for other sites and these should be reconsidered in light of the comments herein.

Within the Charging Schedule, strategic sites of over 400 homes or 10 hectares (gross) or more are exempt from CIL. Paragraph 3.4.14 states that this approach has been taken from the Chiltern and South Bucks CIL Charging Schedule. 3.4.15 goes on to say -

> *While such a threshold cannot be specifically evidenced (to the precise point) through viability assessment, BC will have experience of how this has been operating as part of the Chiltern & South Bucks CIL Charging Schedule. In this instance, it appears to have scope to be effective, because upon reviewing the scale of development relevant to consider in the VALP supply, the site sizes fell either well below or above a 400 dwellings potential threshold, hence the selection of the*

typologies up to 100 and then the strategic scale development modelling at 550 plus dwellings. It appears that the same 400 threshold applied to N&CB would not sit around a cusp of change in typical site characteristics, but clearly between quite distinct sets of circumstances. Again, the Council will be able to consider this further.

Given the above, the typology thresholds jump from 100 to 550 dwellings. It is assumed that site sizes fell well below or above 400 dwellings. This assessment was from the Chiltern and South Bucks area. Firstly, we highlight that the VALP contains site allocations between 200 – 400 units and therefore the same assumption about site sizes cannot be taken here and there should be a greater range of typologies at these site sizes. Secondly, the Chiltern and South Bucks area has a very different affordability profile to North and Central (see below). It also has a very different landscape with significant areas of Green Belt and National Landscapes. Therefore, it is not appropriate to adopt the same assumptions from a very different area.

We also question the threshold of 10ha (gross) as a trigger for CIL exemption. Appendix 3 – Strategic Scale Typology results assume a site of 550 homes will have a gross area of 82 hectares and a net area of 13.75 hectares, delivering a density of 40dph. In appendix 2 a site of 100 dwellings is assumed to have a gross site area of 3.6 hectares and a net site area of 2.5 hectares, delivering a density of 40dph.

As with the commentary above, the typologies do not have enough examples to cover the scenarios being considered by the CIL assessment. However, taking the more modest site area adjustment of the 100 unit example (30.55% reduction) a site with a gross area of 10 hectares would be assumed to have a net area of 6.65 hectares. At 40dph, the site would deliver 277 homes. Given previous comments about assuming too high densities and net site areas, the actual number of homes deliverable on 10 hectares (gross) may actually be much less.

There appears to be no correlation between 400 homes and 10 hectares (gross). By setting the exemption threshold at 10 hectares gross, it potentially exempts sites between 200 – 400 homes, which might otherwise be able to pay CIL and reduce the burden for smaller sites.

The arbitrary use of these thresholds and the typology examples in appendix 3, bear no relevance to the actual allocated sites. In May 2024, DSP undertook a CIL assessment for West Oxfordshire District Council. Appendix 3 of their report included site specific testing results. This reviewed the viability of each individual strategic allocation site for the district. This approach should be undertaken for this CIL review. Allocated sites have been identified in the VALP and therefore can be specifically assessed to establish whether CIL can be afforded. At the moment, the exemption of allocated sites is based on assumptions of site size and densities which are details known for the allocated sites and therefore do not have to be assumed.

We again note the progression of BC's emerging Local Plan. A new spatial strategy is being proposed for BC, including new allocations. Allocated sites (of a certain size) are proposed to be exempt from CIL, because they will deliver site specific infrastructure on site. This will be delivered through S106 agreements with financial contributions much higher than other sites and therefore there is no headroom for additional CIL payments. As drafted, all allocations (400 units or more, 10 hectares or more) will be

exempt from CIL. This will be applied to new housing allocations in the new Local Plan, when adopted without consideration of their specific infrastructure requirements. Given the discrepancy with the 10hectare threshold and the lack of typology examples between 100 – 550 dwellings, there is potential that sites without significant need for on site infrastructure could be exempt from CIL. Thus placing a greater burden on smaller sites. If some sites between 200 – 400 could contribute to CIL, the rates for all site could be lowered.

New iterations of the NPPF reflect the Government's acknowledgement of the contribution small and medium sites can play in housing delivery. The long lead in times for delivery of strategic sites increases reliance on small and medium sites, particularly at the beginning of a plan period. As current allocations are being delivered at a slower rate than anticipated (confirmed in the January 2025 Technical Note) and with BC currently unable to deliver a 5 year housing land supply the deliverability of small and medium sites is crucial. However, the CIL charging schedule as drafted places a significant financial burden on these sites. Whilst these sites should contribute to any emerging CIL, rates at £200 - £250 / sqm for greenfield sites are not sustainable and there should be consideration for larger sites to contribute in order to reduce these rates.

Within the North and Central Area there are 36 made Neighbourhood plans. In addition there are 14 emerging plans. Given the delayed delivery of strategic sites and the inability for BC to demonstrate a 5 year housing land supply, we strongly suggest that if CIL is to be adopted at this premature stage, any housing allocations identified within these NP's should also be exempt from CIL within the proposed charging schedule. These sites are crucial to the success of the spatial strategy (current and future) and as discussed elsewhere, their viability could be compromised by policies from the emerging Local Plan, if CIL rates based on the VALP are applied to sites brought forward under the new Local Plan. Making NP allocations exempt within the new charging schedule would avoid any viability issues that may arise following adoption of new Local Plan policies (in particular the increase in affordable housing rates from 25% - 40%) that may prevent delivery of these sites.

Comparisons

The rate of £200/sqm for greenfield site appears unsustainable when compared to CIL rates across the rest of Buckinghamshire. CIL is already in place for the West Area (formerly Wycombe district) and East & South Areas (formerly Chiltern and South Bucks districts). Rates in these areas have been updated for 2026 and are as follows:

- West Area
    - Residential Zone A - £223.21/sqm
    - Residential Zone B - £267.86/sqm

- East & South Areas
    - £179.64/sqm

The North and Central area of Buckinghamshire is considered to be more affordable than West, East and South areas. For example Beaconsfield in the south has average house prices of c£1.1m[3] and is considered one of the most expensive towns in Britain alongside other ultra-high value areas such as Amersham and Gerrards Cross. Conversely, the northern area contains more affordable markets of Aylesbury, Buckingham and Winslow.

Given the difference in affordability, it is inconceivable that the Northern and Central area can sustain a charge of £200/sqm compared to £179.64sqm in the East and South. We also argue that there should be more of a marked difference from the West area, which also includes higher value areas compared with the Northern and Central area.

Conclusion

We have evidenced herein that the CIL rates for greenfield sites at £200/sqm and £250/sqm are too high. This Is due to incorrect assumptions on likely densities and site areas which result in inflated GDV's and too low land values. GDV assumptions are also based on outdated predictions for interest rates and mortgage rates which are in real terms significantly higher than those anticipated, with potential for further rises. These outdated predictions also lead to incorrect assumptions for build cost inflation, borrowing costs and acceptable profit margins.

In addition to the above, we highlight incorrect policy assumptions particularly in relation to the application of affordable housing and BNG policies on smaller sites (1-9 homes), resulting in unsustainable CIL rates.

Whilst the VALP sets current planning policy upon which the CIL assessment is based, the emerging Local Plan proposes some significant policy changes, which have the potential to impact the viability of sites allocated within Neighbourhood Plans and new allocations within the emerging plan. In particular, we highlight the risk of applying CIL rates based on 25% affordable housing requirements, when the emerging plan is looking to increase this to 40%. As a result, sites coming forward under the new Local Plan would not be viable. This would be the case for land at Manor Farm, Whitchurch which is allocated in the made Whitchurch NP. The 'headroom' assumed available to fund CIL would be diminished by the requirement to provide an additional 15% affordable housing, which has not been factored in.

Whilst our proposal to exempt NP allocations from CIL would protect these sites from the above viability issues, new qualifying sites (allocated and non-allocated) anticipated to be delivered under the emerging Local Plan would still be impacted, thus immediately compromising a new spatial strategy and its ability to delivery its housing requirement.

Therefore, notwithstanding the discrepancies with the assumptions made to assess CIL rates, given the above we suggest that the introduction of CIL is premature and its introduction should be paused until the new Local Plan is adopted. CIL rates based on old policy requirements such as 25% affordable housing could immediately impact the delivery of the new plan's housing requirement.

[3] House Prices in Beaconsfield

However, should the examiner consider to proceed with the CIL charging schedule, we strongly suggest that baseline assumptions for site sizes, densities and costs are reviewed. We also suggest consideration is given to address policy discrepancies with the emerging Local Plan, which would impact viability of emerging sites.



Jenny Hutchings
Director

M – [redacted]
E – [redacted]
W – www.victorialand.co.uk

Community Infrastructure Levy draft charging schedule consultation – printed survey

1. Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Please tick (✓) one option

- ☐ Yes
- ☑ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

Please see attached response.

2. Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Please tick (✓) one option

- ☐ Yes
- ☑ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

Please see attached response.

3. Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Please tick (✓) one option

- ☐ Yes
- ☑ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

Please see attached response.

4. Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities.

Please tick (✓) one option

- ☑ Yes
- ☐ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

5. Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Strategic sites are large sites of 400 homes or more (gross) or 10 hectares or more (gross) that are allocated in the Local Plan and including any parcel within a large site irrespective of the size of the parcel, and all uses within allocations. These sites would be expected to provide infrastructure directly and through s106 planning obligations.

Please tick (✓) one option

- ☐ Yes
- ☑ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

Please see attached response

6. Do you agree with the proposed boundaries of the different CIL charging zones?

Please tick (✓) one option

- ☐ Yes
- ☑ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

Please see attached response

7. Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?

Please tick (✓) one option

- ☐ Yes
- ☑ No
- ☐ I don't know

If you answered No, please say why, and what you think should be changed.

Please see attached response.

8. Do you agree with the proposed instalments policy?

Please tick (✓) one option

- ☐ Yes
- ☐ No
- ☑ I don't know

If you answered No, please say why, and what you think should be changed.

9. Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?

Please tick (✓) one option

- ☐ Yes
- ☐ No
- ☑ I don't know

If you answered No, please say why, and what you think should be changed.

10. Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district)

Please see attached response

11. Do you wish to speak at the public examination of the draft CIL Charging Schedule?

Please tick (✓) one option

☐ Yes, I wish to speak at the public examination

☑ No, I do not want to speak at the public examination

If you answered Yes, please provide your name and an email address so that we can contact you.

Full name

Email address

12. Please indicate if you wish to be notified of any of the following:

Please tick (✓) any that apply

☑ That the draft charging schedule has been submitted to the Examiner in accordance with section 212 of PA 2008

☑ The publication of the recommendations of the Examiner and the reasons for those recommendations

☑ The approval of the Charging Schedule by the charging authority

If you wish to receive any of these, please provide an email address so that we can keep you informed.

[redacted]

About you

We will use the information you provide here only for the purpose of this activity. We will store the information securely in line with data protection laws and will not share or publish any personal details.

13. Which of the following describe you?

Please tick (✓) all that apply

- ☐ I live in Buckinghamshire
- ☐ I work in Buckinghamshire
- ☐ I study in Buckinghamshire
- ☐ I represent or own a business in Buckinghamshire
- ☑ I am a developer or planner in Buckinghamshire
- ☐ I represent a community or voluntary group in Buckinghamshire
- ☐ I am an elected representative in Buckinghamshire
- ☐ I represent a Parish / Town Council or Town Committee in Buckinghamshire
- ☐ I work for Buckinghamshire Council
- ☑ Other (please give details below):

LAND PROMOTER

14. How did you find out about this consultation?

Please tick (✓) all that apply

- ☐ Local media (newspaper, radio, TV, website or newsfeed)
- ☐ Social media (Facebook, Twitter/X, Instagram, Nextdoor or LinkedIn)
- ☑ Buckinghamshire Council website or Your Voice Bucks website
- ☐ Email or newsletter from Buckinghamshire Council
- ☐ Buckinghamshire Council staff or other professionals
- ☐ Through working at Buckinghamshire Council
- ☐ Poster or leaflet
- ☐ Friend or family member
- ☐ Local community or special interest group
- ☐ Councillor, town/parish council or community board
- ☐ Other (please give details below):

15. Are you responding as an individual or on behalf of an organisation (e.g. a business or a voluntary group)?

Please tick (✓) one option

- ☐ As an individual (go to question 17)
- ☑ On behalf of an organisation

On behalf of an organisation

16. Please provide the following details:

Name of organisation:

VICTORIA LAND LTD

Your role/job title:

DIRECTOR

End of survey if responding on behalf of an organisation

More about you

We want to hear from as many people as possible to understand the views and needs across Buckinghamshire. The following questions help us see if the communities we serve have had the opportunity to be heard through this activity.

All questions are optional. You can skip any questions you do not wish to answer.

17. What is your postcode?

We want to understand the views of people living in different areas. You don't have to provide your postcode, but it helps us plan and make considered decisions.

18. What is your age?

Why we ask this: We want to understand the experiences and views of different age groups.

Please tick (✓) one option

[redacted]

19. Do you consider yourself to have a disability / disabilities, impairment(s) or long term health condition(s)?

Why we ask this: We want to understand the experiences and views of disabled people, people with impairments and people with long term health conditions.

Please tick (✓) all that apply

[redacted]

20. Are you:

Why we ask this: We want to understand the experiences and views of different sexes.

Please tick (✓) one option

[redacted]

21. How would you describe your ethnicity?

Why we ask this: We want to understand the experiences and views of different ethnicities.

Please tick (✓) one option

[redacted]

Please give other details here:

THE IVERS
PARISH COUNCIL
45B High Street, Iver, Buckinghamshire, SL0 9ND
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Buckinghamshire Council consultation re CiL changes for the North and Central of the County of Buckinghamshire

The Ivers Parish Council is located in the south of Buckinghamshire, an area where Community Infrastructure Levy (CIL) has been long-established and where parish councils have demonstrably used CIL to deliver tangible local infrastructure and wellbeing benefits.

This Parish Council does not support the proposals contained in the consultation that would reduce the proportion of CIL passed directly to parish councils. While the proposals are currently framed for implementation in the north, it is clear from Buckinghamshire Council policy documents that once introduced, such arrangements are likely to be standardised across the County, including the south.

The basis of our objections

1. Reducing parish-level CIL undermines delivery of local wellbeing infrastructure

Parish and town council level CIL is one of the only funding streams that can be used flexibly and responsively to address the health, wellbeing and social impacts of development at community level.

CIL regulations explicitly allow us (a parish council) to fund both physical and social infrastructure e.g. community halls, recreation grounds, play areas, youth and older persons facilities, sports and wellbeing facilities, speed reduction schemes, open space and nature recovery schemes.

Reducing the most locally based allocations would:

- remove the financial means to deliver small-scale but high-impact community projects particularly important for communities that are expanding through development which in turn funds the CiL.
- disproportionately affect villages and semi-urban parishes where larger strategic infrastructure will not be delivered locally.

2. Parish councils are best placed to identify and prioritise wellbeing needs

Buckinghamshire Council's own reporting acknowledges that local CIL is passed to parish councils to enable community-led investment that reflects local priorities. In addition parish councils have direct democratic accountability to residents, understand cumulative development pressures on wellbeing, and can act quickly compared to county-level capital programmes.

Centralising CIL risks funding being diverted to strategic infrastructure elsewhere, leaving affected communities without mitigation for development impacts. A policy document that allows this to occur is immoral.

3. Centralisation contradicts the stated aims of CIL and localism

The purpose of CIL is to mitigate the impacts of development in the areas where it occurs, not to create a county-level pooling mechanism detached from local consequences. We do not believe that the initiators of CiL were looking at a county as large as Buckinghamshire to be an 'area'.

Buckinghamshire Council itself has stated that passing CIL to parishes promotes recognition of the benefits of development and increases local support for growth.

This approach will certainly weaken trust in the planning system and severely weaken any local support for local development.

4. Wellbeing infrastructure risks being deprioritised at county level

County-level CIL spending is understandably focused on:

- highways,
- education,
- large transport schemes,
- strategic mitigation.

However, social and wellbeing infrastructure is typically smaller, locally specific and less competitive within county-wide capital programmes. The Infrastructure Funding Statements show that Bucks parishes collectively received only a fraction of total CIL yet that portion funds projects directly used by residents every day.

Reducing parish allocations would remove funding from the very infrastructure most closely linked to public health outcomes, social cohesion and quality of life.

5. Parish CIL is especially critical in areas with cumulative development impacts

South Buckinghamshire parishes, including Iver, face:

- sustained housing growth,
- a considerable number of major infrastructure pressures including National Infrastructure Projects,
- air quality and environmental challenges.

CIL at The Ivers parish level is used to address cumulative impacts that are too small for s106 or county CIL to resolve, but which materially affect wellbeing such as footpaths, recreational space, traffic calming and community facilities. It has been

many, many years since South Bucks delivered any such projects in this area and Bucks Council certainly hasn't.

Removing or reducing this funding will leave development impacts unmitigated at the community scale.

6. Once introduced in the north, the model will be imposed county-wide

Buckinghamshire Council documentation makes clear that CIL arrangements are intended to move towards **greater consistency across the authority area**.

The Ivers Parish Council is therefore concerned that acceptance of reduced parish passporting in the north sets a precedent for reducing parish CIL across the south, despite the south already demonstrating effective and compliant use of these funds.

22 May 2026
Delivered by email

Ref: BELR3021

Planning Policy Department
Buckinghamshire Council
Walton Street
Aylesbury
HP20 1UA

Dear Sir / Madam,

BUCKINGHAMSHIRE COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE NORTH & CENTRAL ARES (FORMER AYLESBURY DISTRICT)

REPRESENTATIONS ON BEHALF OF BELLWAY (IN RELATION TO THEIR INTERESTS AT STOKE MANDEVILLE)

We write on behalf of our client, Bellway Homes Limited (Bellway) in response to the Buckinghamshire Council Community Infrastructure Levy (CIL) Draft Charging Schedule consultation for the North and Central areas (former Aylesbury Vale District) published in April 2026 for consultation until 24th May 2026.

At present, there is no CIL in place across the North and Central areas of Buckinghamshire. The Draft Charging Schedule, supported by the Dixon Searle Partnership Viability Assessment (March 2026) and the Council's Infrastructure Funding Statement (December 2025), proposes the introduction of a CIL charge for the first time across the former Aylesbury Vale District.

In particular, these representations relate to the land promoted by Bellway to the south of Marroway, Stoke Mandeville (hereafter referred to as "the Site").

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 a number of sites within the Buckinghamshire district. Bellway is promoting land south of Marroway, Stoke Mandeville for residential development. This site extends to 13 hectares in size and is currently in agricultural use. The Site can accommodate up to 250 new high-quality homes in a balanced range of sizes and tenures, including affordable housing. The Site lies on the southern edge of Marroway, approximately 1 km from the village centres of Stoke Mandeville and Weston Turville, with access to existing amenities in both. It benefits from good walking, cycling, and public transport connectivity. A significant amount of development is planned around the

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south and eastern edge of Aylesbury, including in the vicinity of this Site. That growth includes the 'South Aylesbury' site (AGT1 allocated for around 1,000 homes) and the 'Aylesbury south of A41' site (AGT4 allocated for at least 2,913 dwellings, also known as Hampden Fields).

The Site lies within the Chiltern Beechwoods Special Area of Conservation (SAC) zone of influence. On the Council's published charging zone map (North & Central Buckinghamshire CIL Charging Zones 2026), the Site sits at or in close proximity to the boundary between proposed Zone C (Aylesbury Area within the Chiltern Beechwoods Zone of Influence) and proposed Zone D (Other Areas within the Chiltern Beechwoods Zone of Influence). With the SAC adjustment applied, that boundary separates a £0/sqm rate from a £120/sqm rate for greenfield residential schemes of 10 or more dwellings.

Bellway supports the introduction of a CIL in principle and recognises the role it can play in funding necessary infrastructure to support sustainable growth. The concerns set out below relate to:

- The absence of any clearly defined boundary for the proposed charging zones, which creates a subjective sharp differential in liability on the southern edge of Aylesbury; and
- The deliverability of the proposed rates against the current pressures facing housing delivery.

These representations seek an appropriate rate and zone designation for the Site and reserve the right to make further representations at subsequent consultation stages and at examination.

Proposed Charges

As set out above, the Site sits immediately to the south east of the existing Aylesbury urban edge. It is functionally an extension of the Aylesbury urban area and shares its services, transport connectivity and value characteristics.

The proposed DCS sets out differential CIL rates by location, site type and scale. Of particular relevance to the Site, the proposed rate for greenfield residential development of 10 or more dwellings is:

Proposed Zone	Headline rate (£/sqm)	Rate after SAC adjustment
Zone A – Aylesbury / Buckingham main towns	£80	n/a (outside SAC)
Zone B – Other Areas	£200	n/a (outside SAC)
Zone C – Aylesbury Area within SAC	£80	**£0/sqm**
Zone D – Other Areas within SAC	£200	**£120/sqm**
Strategic sites (400+ dwellings) – all zones	£0	£0

To illustrate the materiality of the proposed zone boundary at the Site, the table below sets out the impact of Zone C versus Zone D designation on the indicative scheme:

Indicative residential floorspace (GIA, sqm)	Zone C – CIL liability	Zone D – Cil liability
Approx. 22,500 sqm (250 units x 90 sqm avg)	**£0**	**£2,700,000**

These figures are indicative only and the actual liability will depend on the final scheme mix and unit sizes. The point is the scale of the difference. Two parcels of land on the same edge of Aylesbury, of identical value and with the same infrastructure needs, would face very different CIL liabilities depending on which side of an unmarked line on a map they sit. That cannot be justified on the evidence currently before the Council.

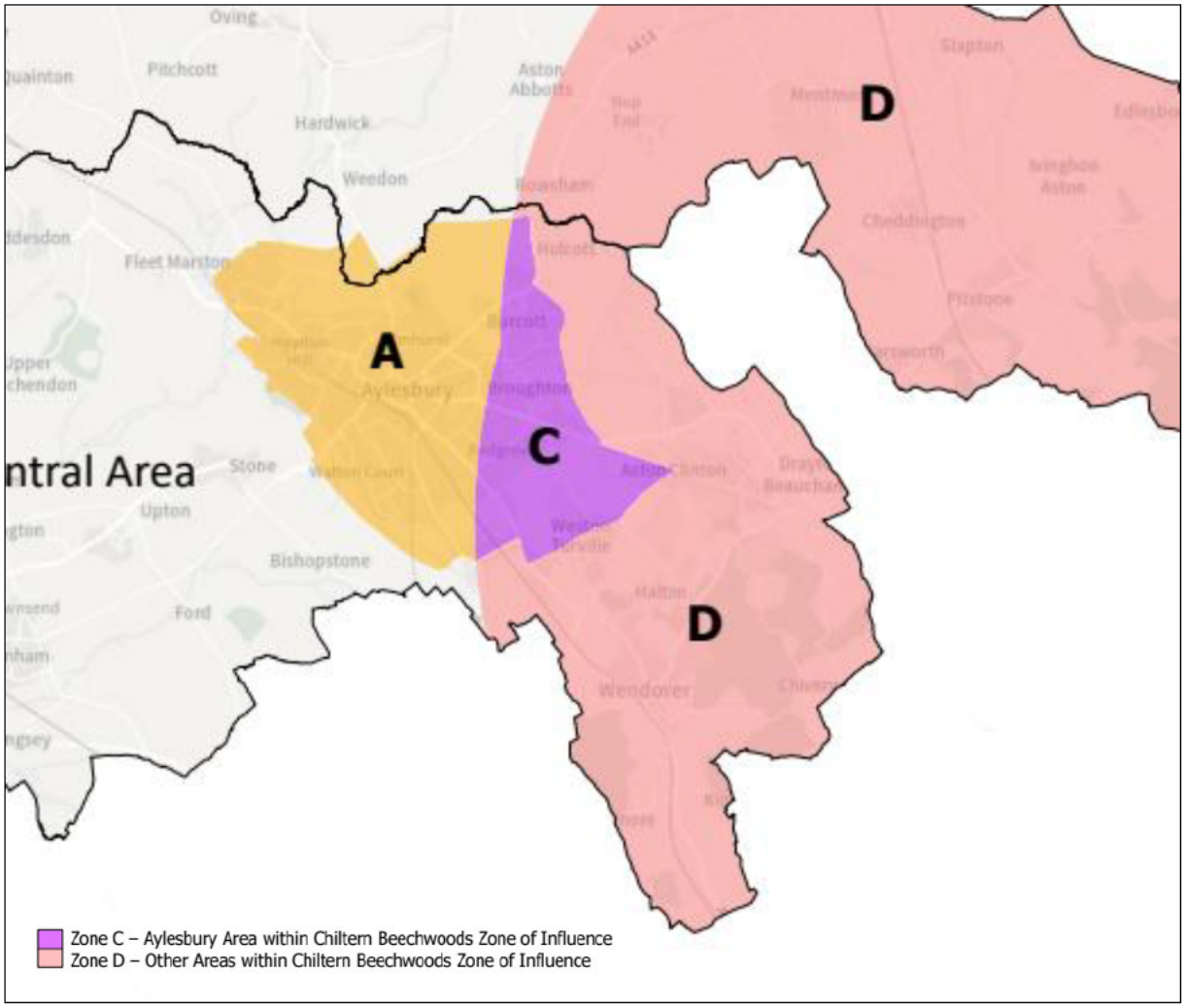


Figure 1: Proposed CIL Charging Zones (site location marked with red star)

Housing Need and Policy Context

The Government has consistently identified the delivery of 1.5 million new homes in this Parliament as a key objective. In December 2024, in publishing a revised, pro-growth National Planning Policy Framework (NPPF), the Deputy Prime Minister wrote to local authority leaders in England describing "an acute and entrenched housing crisis" in which *"the average new home is out of reach for the average worker"* and *"just 220,000 new homes were built last year"*. The delivery of new homes is a national priority and a pressing local issue for Buckinghamshire.

The Council's own Infrastructure Funding Statement (December 2025) ("IFS") accompanying the consultation records, at paragraph 2.23, that following the December 2024 policy changes Buckinghamshire's housing need has been increased by approximately 48%. The new target, including a 5% buffer, is 90,069 homes or 4,289 per year over the period 2024-2045. Whilst the figure for the North and Central area specifically will be determined through the emerging Local Plan, this represents a step-change in the scale of housing delivery required.

Anything which undermines the deliverability of housing in this context will be counterproductive to the Government's objectives and to the Council's ability to plan positively for growth. CIL is a non-negotiable, fixed levy. Once adopted, it applies regardless of the planning balance, the specific circumstances of an individual scheme or the wider benefits a development may deliver. There is therefore very limited scope for discretion in how the Charging Schedule is applied once adopted, and the calibration of rates at this stage is critical.

Viability Backdrop

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 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, including the Future Homes Standard, Biodiversity Net Gain, the Building Safety Act and the incoming Building Safety Levy, alongside increasing infrastructure requirements; and
- The disincentive for landowners to bring forward sites expediently in a market where land values are reducing below previous market expectations.

These pressures are not abstract. They have a direct effect on what schemes can deliver, and they are recognised in part by the Council's own evidence.

At paragraph 22 of the Executive Summary, the Dixon Searle Partnership Viability Assessment (March 2026) ("DSP Report") acknowledges that the appraisal work was overtaken by *"the escalation of war in the Middle East and associated economic circumstances, further NPPF consultation and likely evolution, and the confirmation of the Future Homes Standard"*. The build cost data underpinning the DSP appraisals is taken from BCIS as of December 2025.

The viability headroom assumed by DSP is therefore already narrower in practice than the appraisals suggest. The proposed rates should be set with that in mind, and with appropriate caution given the further cost pressures such as the Future Homes Standard, the Building Safety Levy and Biodiversity Net Gain, that schemes coming forward under the adopted Schedule will need to absorb.

Proposed Charging Zones – Undefined Boundary

The DSP Report defines Zones A, B, C and D only graphically. Paragraph 3.12.3 states that the map at Figure 33 *"represents the zoning that would relate to the above suggested Charging Schedule approach and rates".* Paragraph 3.12.4 says the extent of the main towns *"will be defined through mapping".* The Council's separately published charging zone map (North & Central Buckinghamshire CIL Charging Zones 2026) shows the same boundaries. Nowhere in the evidence is there a written description of what falls into each zone.

The zone boundaries are not anchored to any settlement boundary, parish, ward, neighbourhood plan area or other published boundary. The Zone C boundary around the southern edge of Aylesbury does not follow any obvious administrative or planning line.

This is a material omission. With the SAC adjustment applied, the proposed greenfield rate for 10+ dwelling schemes in Zone C is £0/sqm, in the immediately adjacent Zone D it is £120/sqm. For a 250 unit scheme on the southern edge of Aylesbury, the difference between Zone C and Zone D designation is potentially very costly, as set out above. Two sites either side of a road, on land of identical value and identical infrastructure cost burden, would face fundamentally different CIL liabilities.

The value evidence does not support a difference of this scale**.** DSP's value mapping characterises Aylesbury as a *"typically lower value"* area relative to the wider N&CB area, but it does not show that values change at any specific point on the ground by a margin large enough to support a £120/sqm differential. The Site itself is functionally part of the Aylesbury urban area – it lies on the southern edge of the town and shares its services, transport connectivity and value characteristics. There is no basis in the value evidence to treat the Site any differently from sites within indicative Zone C.

CIL is a charge to fund the infrastructure needed to support new development. The infrastructure required to support a 250 home scheme on the southern edge of Aylesbury is the same regardless of which side of an unmarked line on the map the Site happens to sit. A scheme of the same size and type, on the same edge of the same town, generates demand for the same school places, the same GP capacity, the same road network and the same local services. The Council has not identified, and the evidence does not show, any infrastructure cost on one side of the boundary that does not arise on the other. A non-negotiable charge of this scale cannot be justified by a line that does not correspond to any actual difference in infrastructure need. The Site is functionally part of the Aylesbury urban area. It lies on the southern edge of Aylesbury and shares the services, transport connectivity and value characteristics of the town. There is no value evidence basis on which to treat the Site differently from sites within indicative Zone C.

Without a defined boundary, the rate that applies to a given site will turn on someone's interpretation of an unscaleable map. There is no rule for sites that straddle the line. That is not an adequate basis on which to set a non-negotiable charge.

The Council is respectfully requested to:

- Define the boundary of each charging zone in the body of the Charging Schedule by reference to an existing, published, scaleable boundary;
- Justify, with reference to the value evidence, why the chosen boundary represents a genuine change in viability large enough to support the differential proposed;
- Identify what difference (if any) in infrastructure need or cost arises either side of the chosen boundary that justifies a differential CIL rate of £120/sqm; and
- Include in the Charging Schedule a clear rule for sites that straddle a zone boundary, so that the applicable rate is unambiguous on the face of the document.

Conclusion

The Site lies on the southern edge of Marroway, Stoke Mandeville, immediately adjacent to the southern Aylesbury urban edge. It is being promoted for residential development of up to 250 new homes. On the Council's published charging zone map, the Site sits at or close to the boundary between proposed Zone C and proposed Zone D.

Bellway supports the introduction of a CIL in principle. However, as drafted, the Charging Schedule cannot be applied fairly or consistently. The proposed cliff-edge between Zone C and Zone D at the southern edge of Aylesbury, separating a £0/sqm rate from a £120/sqm rate, is not justified by the value evidence, is not supported by any difference in infrastructure burden either side of the line and is not anchored to any defined boundary on the ground.

Bellway would welcome the opportunity to engage further with the Council on the matters raised and reserves the right to make further representations at subsequent consultation stages and at the examination of the Charging Schedule.

Yours sincerely,

David Murray-Cox
Director

[redacted]

22 May 2026

Infrastructure Funding Team
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Dear Sir/Madam,

Consultation Response to Draft Charging Schedule for Community Infrastructure Levy for the North and Central areas of Buckinghamshire (the former Aylesbury Vale district)

Savills (UK) Ltd is instructed by Lands Improvement, hereafter "Our Client" to submit a representation to the Draft Charging Schedule for the proposed introduction of a Community Infrastructure Levy (CIL for the North and Central areas of Buckinghamshire.

Our client is an experienced land promoter with a track record in acquiring large-scale greenfield and brownfield schemes, particularly within Buckinghamshire. Their portfolio includes the Haddenham Airfield site where 380 units have been delivered to date. In summer 2025, an outline application was submitted for up to 700 dwellings, a primary school, open space, and associated infrastructure (Application Reference: 25/02417/AOP).

Response to Consultation

Given our client's land interest in the proposed charging area, this response is concerned with Question 5 – "*Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?"*

As drafted, the Charging Schedule proposes that "Strategic scale housing allocation sites" should be £0 rated for CIL purposes the Strategic scale is defined as site with a capacity of over 400 units. Our client **strongly supports this approach in principle** but considers that it should apply to **all developments that will provide over 400 units**. As drafted, it appears that only allocated sites will be zero-rated for CIL purposes, where the reality is that strategic sites brought forward on unallocated sites will be affected by the same viability considerations.

The Council's own evidence confirms it cannot demonstrate a five-year supply of housing land, and this position will not materially improve until the Local Plan is adopted in late 2027. As such, strategic scale development on unallocated sites will continue to play a key role in boosting housing supply across the proposed Charging Area and it is vital that a consistent approach is taken to how the Council funds the infrastructure necessary to ensure the successful delivery of all the strategic sites that come forward, allocated or not.

It is well-established that CIL alone is unlikely to be able to deliver strategic infrastructure due to the lack of flexibility in a charging schedule making a bespoke Section 106 (S106) agreement more appropriate for strategic size sites.

The Government's CIL guidance states, "*A charging authority should take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land. A realistic understanding of costs is essential to the proper assessment of viability in an area…If the evidence shows that the area includes a zone,* ***which could be a strategic site, which has low, very low or zero***

viability, the charging authority should consider setting a low or zero levy rate in that area. [Emphasis added]

It is important to note that this guidance does not differentiate between allocated and unallocated sites, it is only interested in strategic sized sites.

The Dixon Searle Partnership Viability Assessment is a comprehensive report, and our client does not offer any particular comments on the conclusions that it reaches. The modelling undertaken reaches the clear conclusion that, "*…it is considered unlikely to be appropriate to introduce a CIL that adds significant fixed cost to strategic scale development. While some (nominal) level of CIL charging is not totally ruled out on viability grounds given the mixed results overall, there appears to be relatively little headroom to accommodate fixed CIL charging.*"

The arguments for this are well known and principally include the amount of cost required in support of often significant specific infrastructure costs, development mitigation and abnormal site-specific costs. These are exacerbated on unallocated sites that attract a greater planning risk and have additional hurdles to overcome before permission is granted. These costs should be factored in like any other.

Across the country there are CIL Charging Schedules that take a different approach between allocated and unallocated greenfield sites. Our client does not believe that this is the right approach in this area, given the universally high land values.

Given the above, our client considers it **essential that all strategic sites (over 400 dwellings) are zero-rated for CIL (and not just allocations over 400)**.

We hope this letter is a useful contribution on the process and our client would like to be notified of any opportunity to make further representations at an Examination in due course.

Yours faithfully,

Savills

Savills

DAVID LOCK ASSOCIATES

REPRESENTATIONS

LOCAL PLAN FOR BUCKINGHAMSHIRE – COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE CONSULTATION
Submitted on behalf of Hallam Land
May 2026

Responses in relation to Survey Questions
Overview (Questions 1, 9 and 10):

It is acknowledged that adopting CIL can be an important source of developer contributions for a local authority to fund the provision, improvement, replacement, operation or maintenance of infrastructure that supports the development of its own area and that introducing CIL can create more certainty over a level of infrastructure funding from a spread of developments.

The Infrastructure Funding Statement assesses infrastructure funding costs and is based on the infrastructure projects in the 2017 IDP which was prepared as part of the evidence base for the Vale of Aylesbury Local Plan (VALP) 2013-2033. As VALP has been adopted now for almost 5 years and the IDP is almost 10 years old, and the new Local Plan for Buckinghamshire (LP4B) is in preparation with its submission expected at the end of 2026, Hallam Land suggest that the charging schedule should be drafted following/ alongside the submission of LP4B and its evidence base and so that it appropriately accounts for future planned growth and infrastructure requirements. It is considered that any CIL charging schedule is prepared with sufficient flexibility but clarity to ensure there is the ability to collect CIL rates in the emerging Plan context. This point is referenced in the Dixon Searle Partnership (DSP) Report which notes that; "it appears appropriate to look to set a CIL now which will have a reasonable prospect of working appropriately, looking ahead" (p93) and

However, Hallam Land recognise that based on the 2017 IDP evidence, a funding gap is identified and that the Council are of the view that a CIL charging schedule is necessary in North and Central areas of Buckinghamshire (the former Aylesbury Vale district).

Overall, Hallam Land are supportive of the identified approach to target the North and Central areas with a new charging schedule rather than bringing in a new county-wide charging schedule.

Question 2:
The proposed CIL rates (£/square metre) appear to be supported by evidence and are comparable to existing CIL rates in adjacent/nearby local authorities. Once implemented, CIL rates will be fixed (non-negotiable) and will impact as a top slice from the development funds. Therefore, in order to prevent adverse effects on the viability of developments, it is critical that S106 contributions are not also sought on schemes where CIL is being charged to ensure there is no occurrence of 'double counting' of

infrastructure provision. This point appears to be recognised within the DSP Report which states that cumulative costs that developments are expected to bear must be carefully considered and especially applies to medium sized developments. This is particularly pertinent in the Buckinghamshire context where housing targets are high and the overall housing supply for the North and Central Area currently stands at 3.73 years for the five year period 2025-2030 (as at 31 March 2025) and where there is also an overwhelming need for affordable housing.

Contributions and charges sought should always be transparent, evidenced and compliant with the CIL Regulations. As such, the draft CIL charging schedule and or process flowchart (or similar) should be published alongside the CIL examination and finalised upon adoption so developers and planning officers have absolute clarity on how CIL and S106 applies in relation to different schemes. Clearly, collection of charges and expenditure will need to be evidenced in an annual Infrastructure Funding Statement also published regularly.

Question 3:

Hallam Land support the approach for Aylesbury and Buckingham Areas to be identified in Zone A with lower charging rates applied compared to other areas in this part of the county (Zone B). This recognises the typically higher values away from the localities of the main towns and also these localities as sources of new housing supply. The DSP Report also notes that the edge of Milton Keynes also has typically lower values but yet this part of the county is not covered by Zone A. The DSP Report explains that this is not considered necessary as at the Milton Keynes fringe a great majority of development that underpins the planned delivery is coming forward on strategic scale developments – noting that large sites of 400 homes or more (gross) or 10 hectares or more (gross) on allocated sites will have a £0/sq.m applied. It does appear though that should sites come forward below this 400 dwelling threshold, that a charge of £200/sq.m would apply. The approach adopted considers that zoning the edge of MK is not necessary as it is only considering sites adopted in the adopted Local Plan. This Plan was adopted in 2021 and with the aforementioned housing land supply issues, it is considered that the edge of MK should be added in to Zone A, as a key source of new housing supply. This would mean that windfall sites, and/or future developments allocated in the emerging Local Plan will be charged an appropriate rate to reflect the lower values also on the edge of MK (as set out in Figure 17 of the DSP Report).

The distinct and lower rates applied to schemes for residential development within the Chilterns Beechwoods SAC's zone of influence is also supported. This recognises the separate payment required from every new dwelling towards SANG and SAMM as a 'fixed priority slice' of funds as another cost developers have to bear (and which is a relatively recent requirement). Recognition of the burden of schemes around Aylesbury having an additional development cost in relation to the South East Aylesbury Link Road (SEALR) and that a specific review of the package of requirements is applicable is also welcomed.

Question 4:

All other forms of development have a CIL charge applied of £25/sq.m. The wording of this in the Schedule means that developers of strategic sites which have a nil rate assigned in relation to the building of dwellings in recognition that developers will be making significant S106 contributions, will be applied a CIL rate to deliver the complementary elements in those strategic sites which need to come forward with sports pavilions, doctors surgeries, community halls and other supporting infrastructure. As these sites will be subject to S106 contributions, the intention for this category needs to be worded more carefully.

Similarly, a nil CIL rate is applied for 'development by a predominantly publicly funded or not for profit organisation' for medical and health services etc. More clarity is required to distinguish how this rate applies in practice especially as per the point above, housebuilders may have to 'develop' these uses as part of strategic sites and therefore, this nil rate should also be applicable to them too.

Question 5:

The proposed charge of a nil rate of CIL for the development of strategic sites (400 homes or more or 10 hectares or more) is also supported. This rightly recognises the differentials between the nature and scale of these developments and the amount of cost required in support of often significant specific infrastructure costs and development mitigation and that there is little headroom to accommodate fixed CIL charging. The Schedule though specifies this is applied for sites that are allocated in a Local Plan. As a minimum, this should also refer as well to sites allocated in a Neighbourhood Plan. However, there is a case to widen this further as referred to earlier in these representations; the VALP was adopted in 2021 but preparation of the Plan commenced in 2014 (after previous failed draft versions of the Plan). As a result, many of the housing developments (including strategic sites) allocated in the VALP had already had applications submitted or approved or had even commenced on site at the time of adoption of the Plan. Therefore, to limit the charging schedule to sites allocated in the Local Plan only is likely to fetter a significant number of developments coming forward on sites allocated in the emerging Buckinghamshire Local Plan (Reg 19 version due to be published in July 2026 and submission expected in December 2026) which based on the current wording may end up being charged CIL rates. There was a period of 3 and a half years between the submission of VALP and its adoption, and with timescales for the adoption of the new LP4B not yet fully known, there is a good case to apply the nil rate to all strategic sites in general or at the very least to sites allocated within a submitted plan. With the pressing need to continue the delivery of housing in the county, this is even more critical. It is also noted that none of the other categories refer to the charges applying to allocations in a Local Plan.

Question 6:

In terms of the proposed boundaries of the different CIL charging zones, Zone A around Aylesbury and Buckingham appear to be drawn a little wider than the current settlement boundary but are at a scale and drawn on a base plan where some ambiguity could arise. It is assumed that a pragmatic approach will be adopted which means that sites adjoining/adjacent to the broad orange area can also benefit from a Zone A rate as they logically also experience lower values and contribute to the supply. For

example, Hallam Land have a current application submitted for up to150 new dwellings on land North of Prince Rupert Drive, Aylesbury (application reference PL/26/02770/OA) which falls outside the shaded area but should also logically benefit from a Zone A rate. It is suggested that this approach should be made clearer on the Charging zone map with inclusion of an asterisk on the plan identifying that; 'the boundaries between Zones A and B are indicative' and in the Charging schedule, it should be explicitly stated that a scheme on sites that would effectively be an extension to the urban area of Aylesbury or Buckingham, will fall within Zone A rather than the rural/other areas rate (Zone B).

Question 7

Hallam Land responded to the Local Plan viability consultation which has significant crossover to this question. Please find response attached for reference. At this stage Hallam have no specific comments to make on the DSP CIL evidence beyond any applicable points made in the viability response.

Question 8:

It is noted that the instalment policy is the same as the existing instalment policy for West area (former Wycombe District Council area). The West area is generally subject to smaller scale developments where the suggested instalment policy may have worked effectively but in the North and Central area, (which is less constrained that the rest of the county), there are likely to be many more schemes which would generate a CIL payment greater than £300,000. As currently drafted, CIL would apply to any speculative scheme regardless of scale and any allocation up to 399 homes. Taking a modest scenario of a 399 dwelling scheme in a Zone A location, assuming an average of 100sqm per dwelling and 25% affordable housing provision, this would equate to a CIL charge of nearly £2.4million on a site that would take 5-6 years to build out. Hallam Land therefore consider that the instalment policy needs at least one further upper category as many major developments will exceed the £300,000 current upper category. For example, a further category for over £600,000 could be added and which includes the third (50% payable) within 720 days. This would assist with the deliverability of schemes by staging the CIL charge more proportionately to occupations and avoiding the additional burden of upfront costs. In addition, the instalments policy states payment periods and amounts from commencement of development; if a large development is being implemented in phases, rather that the whole amount liable for payment from first commencement (and payable in 3 instalments), it is considered that it should be clear that payment of CIL for that phase should relate to commencement of that phase, again to support the deliverability and viability of schemes.

Deanfield Homes
Oakingham House
Frederick Place
High Wycombe
Buckinghamshire
HP11 1JU

Buckinghamshire Council
(FAO Infrastructure Funding Team, CIL North Consultation)
Walton Street Offices
Walton Street
Aylesbury
HP20 1UA

20th May 2026

Dear Sir or Madam,

RE: Draft Community Infrastructure Levy Charging Schedule Consultation for North and Central Buckinghamshire

I write on behalf of Deanfield Homes in relation to the consultation on the draft Community Infrastructure Levy (CIL) Charging Schedule for North and Central Buckinghamshire.

Having reviewed the draft charging schedule and accompanying viability evidence from the Dixon Searle Partnership, we would raise a number of concerns regarding the potential implications for development viability and housing delivery across the district, particularly when considered alongside the emerging Buckinghamshire Local Plan and current market conditions.

A fundamental issue is that the proposed CIL rates appear to be based upon the existing Vale of Aylesbury Local Plan (VALP) policy framework and associated viability assumptions, despite the Council progressing a new Local Plan which is anticipated to introduce materially more demanding policy requirements.

For example, the viability evidence underpinning the draft charging schedule assumes an affordable housing provision of 25% from the existing VALP, whereas the emerging Local Plan proposes an increase to 40%, with higher requirements anticipated in certain locations. The emerging Local Plan also introduces a considerable increase in the M4(3) to be provided, going from 15% of affordable homes to a requirement of 30%. In addition, 20% of market homes must also now be M4 (3) compliant. These emerging policies alone represent a substantial additional development cost burden which will inevitably reduce overall scheme viability and significantly diminish the level of residual "headroom" currently identified to support CIL contributions. In practical terms, sites which may presently appear viable under the existing policy framework may not remain so once the cumulative impact of emerging policy obligations is properly taken into account.

This issue is particularly relevant to smaller housebuilders, who are generally less able than national volume developers to absorb increased abnormal costs, rising finance rates and compressed development margins. There is therefore a genuine risk that a number of marginal development opportunities, particularly smaller and medium sized greenfield sites, may cease to be deliverable should both the proposed CIL rates and increased affordable housing requirements be applied.

These concerns are further compounded by the Council's current housing delivery position. Given the ongoing pressure surrounding the five-year housing land supply, together with slower than anticipated delivery from larger strategic allocations, smaller and medium sized sites are becoming increasingly important in maintaining housing supply across Buckinghamshire. The proposed charging schedule risks placing a disproportionate burden upon precisely those developments capable of delivering homes within the short to medium term.

There are also concerns regarding the assumptions underpinning the viability evidence itself. The development types adopted appear to assume comparatively high development densities whilst making limited allowance for green infrastructure provision, SuDS, biodiversity net gain requirements, landscape mitigation and emerging policy obligations. In reality, the delivery of edge-of-settlement greenfield schemes across North and Central Buckinghamshire often involves lower densities and more extensive infrastructure and landscape requirements, which materially reduce net developable areas and impact scheme viability accordingly.

As a consequence, the evidence base appears to overstate achievable development values whilst underestimating development costs and land requirements. This creates an unrealistic assessment of the level of CIL contributions that development schemes can reasonably sustain in current market conditions.

Further concern arises from the apparent imbalance within the proposed charging structure, whereby smaller and medium sized developments will be expected to accommodate relatively high CIL rates, whilst larger strategic allocations may benefit from broader infrastructure arrangements or exemptions. Given the increasingly important contribution that smaller sites are currently making towards housing delivery across the district, this approach warrants further review.

In light of the above, we would consider there to be a strong justification for delaying the introduction of the proposed CIL charging schedule so that updated viability work can be undertaken alongside the emerging Local Plan process. This would allow the cumulative impacts of increased affordable housing provision, accessibility standards, biodiversity obligations, infrastructure requirements, build cost inflation, finance costs and wider market pressures to be properly assessed using up to date evidence.

Proceeding with a charging schedule based upon assumptions which are already being superseded by emerging policy risks undermining site viability, constraining housing delivery and creating unintended consequences not just for smaller developers, but for the wider delivery of the Council's growth strategy.

Yours faithfully,

[redacted]

Victoria Roe MRTPI
Senior Planning Manager
Deanfield Homes
[redacted]

From: Laurie Eagling <clerk@pitstone-pc.gov.uk>
Sent on: Thursday, 07 May 2026 09:05:43
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
CC: [redacted]
Subject: [EXTERNAL] CIL charging schedule consultation

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

[You don't often get email from clerk@pitstone-pc.gov.uk. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Thank you for providing the opportunity to comment on the proposed draft charging schedule for CIL for old Aylesbury Vale area.

The parish council considered the materials at the full council meeting on 30/4/26 and resolved to submit one comment to BC, as follows:

The propsal is currently for developments that are located near to a SAC to be required to pay a lower level of CIL contribution. The parish council does not feel that this is an equitable way to attribute the funds, and these developments should attract the same level of CIL as those located in other areas. These parishes should not be adversely affected simply due to their location next to a SAC, as SAC funding does not benefit community infrastructure.

Kind regards

Laurie

--
Please note we are migrating to a new email address :clerk@pitstone-pc.gov.uk. Future replies will come from this address. Please send all future correspondence to the new address.

Laurie Eagling, Parish Clerk
Address : Pitstone Parish Council, Pitstone Pavilion, Marsworth Road, Pitstone, LU7 9AP.
Tel: [redacted]

From: Kelly Harris <clerk@stokehammond-pc.gov.uk>
Sent on: Wednesday, 06 May 2026 10:31:21
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] CIL Consultation

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

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Good morning

Stoke Hammond Parish Council wishes to respond to the current Community Infrastructure Levy (CIL) consultation.

The Parish Council agrees in principle with the proposed approach and recognises the importance of securing appropriate contributions from development to support local infrastructure.

However, we would like to raise a concern regarding the exemption of flats from the levy. We believe that this may create an unintended incentive for developers to favour flat developments over other forms of housing in order to avoid CIL charges. Such an outcome could have a significant impact on the character, balance, and infrastructure demands of our community.

We would therefore urge that this aspect of the proposal be reconsidered, or that safeguards be introduced to prevent potential distortions in development patterns.

Kind regards

Kelly Harris
Clerk & RFO to Stoke Hammond Parish Council

Tel. [redacted] | URL: www.stokehammondpc.com

From: Tom Mason <[redacted]>
Sent on: Wednesday, 20 May 2026 12:58:33
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] Consultation Response

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

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Dear Sirs,

I am writing on behalf of Claydon Estate in respect of the Community Infrastructure Levy draft charging schedule consultation.

We would like to express our strong opposition to the inclusion of agricultural development within the scope of the Community Infrastructure Levy (CIL) proposals for North Buckinghamshire.

The underpinnings of CIL were to capture land value uplift associated with development to fund local infrastructure, particularly where those developments create increased pressures on local infrastructure. This land value uplift would be attributed to housing or commercial development schemes which would create additional pressure on transport networks, schools and healthcare or open space/community facilities. These developments are also able to contribute towards CIL without completely undermining viability of the development.

These assumptions do not hold for agricultural development. Firstly, agricultural developments are functional assets and therefore do not provide a direct source of income or an uplift in the land value as mentioned above. They are carried out for specific business needs such as housing for livestock, grain storage, housing for agricultural workers or animal waste storage/processing.

Secondly, agricultural developments do not increase the pressures on infrastructure (in the way housing and commercial schemes do) as they do not place greater pressure on the public services as mentioned above or introduce additional traffic beyond existing farm movements.

Thirdly, the viability for agricultural development would be completely undermined by CIL charges. For example, if CIL was applied to a new 1,100 sqm livestock building which we are looking to erect, this would result in an increase of 20% in the total cost for erecting that building. This is a cost that farming businesses, including ourselves, cannot afford to bear. Couple this with increasingly volatile commodity markets and high inflationary pressures on input costs, the simple answer is we would not be able to carry out such development.

Finally, the knock-on economic impact of this would be significant. We utilise a local contractor who carries out work for many farming businesses erecting new agricultural buildings. If we are unable to invest in new agricultural development to support the growth and modernisation of our farming enterprise, then the work this creates for our contractor and his employees would disappear. This will then impact the contractor's ability to provide employment at the same level he is currently able to as well as significantly affecting the overall viability of his business.

The National Planning Policy Framework seeks to support a prosperous rural economy and sets out that planning policies should enable the development and diversification of agricultural and other land-based rural businesses. Applying CIL to agricultural development risks completely undermining these objectives.

We therefore would expect to see the removal of agricultural development from the scope of CIL in Buckinghamshire.

Yours faithfully,

Tom

CLAYDON

From: Alun Oliver <[redacted]>
Sent on: Friday, 01 May 2026 18:56:14
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] E3-4: E3 Consulting - Response to CIL Consultation to Draft Charging Schedule
Urgent: High

Attachments: Why PTS_Web.pdf (1.42 MB)

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

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[Please note this has been sent from an **external source** - treat with caution and **do not open** attachments / use links until you are sure this is a trusted communication see intranet/IT for advice.]

Dear Sir/Madam,

E³ Consulting is an independent firm of property taxation specialists and Chartered Surveyors. We were founded in 2003 and operate throughout the UK and have advised on Community Infrastructure Levy (CIL) since 2014 and are now considered one of few advisers that help CILpayers understand the complex CIL Regulations and stay compliant with these to ensure the CIL paid is correct and their projects properly assessed.

We are contacting you with regard to your draft charging schedule for North & Centre Buckinghamshire Consultation and add our view, based upon over twelve years of experience dealing with CIL across projects across England and Wales.

We note that the Dixon Searle Partnership CIL Report, in various places, comments on the viability challenges of flatted schemes and particularly those sited on Previously Developed Land/brownfield sites. However, we caution that your CIL charge Schedule references ***"Development comprising all flats"*** with a headline CIL rate of £0/m². Whilst clearly there are many 'blocks of flats' that might enjoy this reduced rate compared to the general higher rates at £20/50/80/100/180/200 and £250 per square metre - we consider that a significant portion, if not the majority, of flatted developments in our experience are mixed use with retail, community or other commercial uses at ground with flats over. Hence the proposed wording would potentially deny the reduced rates - leaving these schemes to pay the fuller/higher rates as applicable to their specific location and project designations as set out within your Charging Schedule. Economic viability and thus housing growth could be impacted. I appreciate you have no doubt used this term to distinguish between schemes that include houses and flats and do not otherwise sit within the 'Strategic Housing' sites - also at £0/m².

So as to ensure that you maintain economic viability, whilst boosting the number of housing units being created through your region, we respectfully suggest the designation in the Charging Schedule be amended to ***"Development where all of the residential units comprise flats"***.

This clarification will support all flatted schemes but ensure economic viability of regeneration projects that seek to repurpose town centre sites and other PDL that may necessitate other 'mixed uses' - of any sort - but just ensuring the residential parts are entirely flatted, whilst permitting office/retail, community or other applicable uses within the same building/block or permission as may be appropriate. We consider this adjustment would not jeopardise, but improve, the council's intentions towards flats - in need of a lower CIL rate to ensure viability - whilst distinguishing from more 'traditional' housing units.

Should you require any further input please call or email.

Kindest regards,

Alun Oliver
MCIM MBA FRICS | Managing Director

[redacted]

Principal office: Second Floor, Unit 14, Bedrock Park, Vulcan Way, WIMBORNE, Dorset, BH21 7BU
Our telephone and email details remain unchanged.
Also at 4500 Parkway, Solent Business Park, Whiteley, Fareham PO15 7AZ and 33 Foley Street, LONDON, W1W 7

From: Jane MacKinnon <[redacted]@halton-pc.gov.uk>
Sent on: Monday, 25 May 2026 07:59:55
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] Halton PC Response

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

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Dear Bucks Team,

Please accept my apologise for missing your deadline of midnight to post Halton Parish Council's response to the CIL Consultation. I hope that you will still consider our following response:

Halton Parish Council
Response to Draft Community Infrastructure Levy (CIL) Charging Schedule Consultation

Halton Parish Council welcomes the opportunity to respond to the consultation on the Draft Charging Schedule and associated Community Infrastructure Levy (CIL) proposals for Buckinghamshire.

The Parish Council broadly supports the introduction of CIL to areas of Buckinghamshire, including North and Central Buckinghamshire, which have not previously been covered by a charging schedule. The Council considers the proposed approach a positive and proportionate means of securing developer contributions towards the infrastructure needed to support growth.

The evidence-led approach, including the viability work undertaken and its alignment with infrastructure planning, is noted and welcomed. The clear supporting documentation, including worked examples and draft charging maps, has been helpful in understanding the proposed framework.

The Parish Council particularly welcomes the introduction of a new, locally retained funding stream for parishes such as Halton. A proportion of CIL receipts arising from development would provide a valuable opportunity to address the cumulative impacts of growth at a local level.

Even modest funding could deliver tangible improvements for residents, including:

- Public realm and local amenity spaces
- Pedestrian and cycling infrastructure
- Small-scale community facilities
- Environmental and landscape improvements

The Council also recognises the additional benefit of preparing a Neighbourhood Plan, which would increase the local share of CIL receipts and provide a useful incentive for community-led planning.

Halton Parish is already experiencing pressures associated with growth in the wider Aylesbury area, and the Council considers it important that the operation of CIL reflects these local dynamics.

- **Aylesbury Edge Growth:**
  Ongoing and planned expansion at the edge of Aylesbury is likely to have indirect impacts on Halton, including increased traffic, pressure on local services, and greater recreational use of the surrounding countryside. Although such development may lie outside the parish boundary, its effects are often felt within Halton, reinforcing the need for a fair and responsive approach to infrastructure funding and distribution.
- **Traffic and Connectivity:**

From: Gareth Leslie <[redacted]>
Sent on: Sunday, 19 April 2026 16:42:59
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] Infrastructure levy

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

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In simple terms you can no longer go on building more roads.

The one big improvement would be the already proposed Aylesbury Link railway reopening the section between Aylesbury Vale Parkway and joining up with the reopened EWR route to Milton Keynes Bedford serving the new Universal studios. Not only that it opens up massive new northbound amongst others to the north of Aylesbury. Crazily this line will reopen once HS2 finishes their work in the Calvert area in 2028. This the one railway Buckinghamshire residents desperately need.

G Leslie.

From: Adil Iftakhar <[redacted]@aylesburytowncouncil.gov.uk>
Sent on: Monday, 18 May 2026 10:27:16
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] Response to Consultation on Community Infrastructure Levy (CIL) Introduction and Charging Schedule

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

You don't often get email from [redacted]@aylesburytowncouncil.gov.uk. Learn why this is important

Dear Sir/Madam,

Re: Community Infrastructure Levy draft charging schedule consultation

At its Full Council meeting held on the 14th of May 2026, Aylesbury Town Council formally welcomed the proposed introduction of the Community Infrastructure Levy (CIL) within Aylesbury.

The establishment of a CIL charging regime is something that the Town Council has advocated for over many years, recognising its importance in securing appropriate contributions from development towards the infrastructure necessary to support sustainable growth.

The Town Council is supportive of the current proposed charging schedule for new developments within the North and Central areas of Buckinghamshire. We consider that the schedule provides a clear, transparent and appropriate framework to ensure development contributes fairly and proportionately to local infrastructure needs.

We appreciate the opportunity to respond to this consultation and look forward to continued engagement with Buckinghamshire Council as the CIL framework is finalised and implemented.

Kind Regards,

Adil Iftakhar
Deputy Town Clerk

AYLESBURY
TOWN COUNCIL

Town Hall, 5 Church Street, Aylesbury, HP20 2QP Web: www.aylesburytowncouncil.gov.uk
Tel: 01296 425 678

This message has been sent as part of a discussion between Adil Iftakhar and the addressee whose name is specified above. message has been sent to you. In this case, we also ask that you delete this message from your mailbox, and do not forward it

From: Helen Pearson <[redacted]>
Sent on: Monday, 18 May 2026 14:03:14
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>; Planning Policy Team Buckinghamshire Council <planningpolicyteam.bc@buckinghamshire.gov.uk>
Subject: [EXTERNAL] SettleParadigm response to consultation on draft policies

Follow up: Follow up
Start date: Tuesday, 26 May 2026 00:00:00
Due date: Tuesday, 26 May 2026 00:00:00

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

Dear Richard,

SettleParadigm is pleased to respond to Buckinghamshire Council's current consultation on it's Draft Parking Standards for New Developments in Buckinghamshire, Draft Design Code for Buckinghamshire and Community Infrastructure Levy Draft Charging Schedule.

Draft Parking Standards for New Developments
We are supportive of the introduction of new town centre zones, where less car parking is required for new developments due to the availability of public transport, which would help to support delivery of town centre/brownfield regeneration sites. However, we would welcome separate standards of parking for affordable housing (where car ownership is generally lower), particularly in relation to sites of 10 dwellings or less. SettleParadigm has a large number of garage sites within the former Chiltern District area which represent an opportunity to deliver much needed affordable housing within our existing communities on brownfield sites, however these sites are often constrained and not able to provide the car parking this consultation requires. As an example, we are currently working on feasibility for a site the former Chiltern District which under these new Standards would be in Zone C. We are currently planning to provide 1 x 2bed and 2 x 3 bed houses with 6 car parking spaces (2 each) under current guidance but under the new standards 8 car parking spaces would be required. The only way to facilitate this on this site would be to lose a unit, resulting in a decrease in the number of affordable homes delivered.

Draft Design Code for Buckinghamshire
We agree with the aims and aspirations of the Design Code which aligns well with SettleParadigm's corporate aim of providing safe and high quality homes for our residents. We make the following specific comments;

- The requirement for cycle parking to be provided closer to the plot entrance than car parking could prove problematic as it isn't always possible, especially for new houses, where we would provide a cycle hoop within a shed in the rear garden.
- The requirement for balconies to be inset would represent a significant additional cost which may render schemes unviable.
- The requirement for ground floor flats to have their own private entrances which can't be living room French doors could be achievable, but again may come at a cost, by having to increase floor areas to accommodate which could reduce the overall number of units delivered.
- The requirement of having a maximum of 10 flats off one core. We would suggest 12 flats off one core which would equate to 3 floors of 4 per floor.
- Policy R1 Resources could be problematic and does not seem to reflect the Future Homes Standard regarding PV panels covering 40% of the ground floor area. In addition, the location of Air Source Heat Pumps is often dictated by technical restrictions such as a maximum length of piping so siting in non-prominent locations away from windows may not always be possible.

Community Infrastructure Levy Draft Charging Schedule
Historically, SettleParadigm has applied for and received 100% relief of CIL due to the provision of affordable housing, an approach which has often supported scheme viability and we would not expect this to change.

Kind regards,
Helen

Helen Pearson
Head of Regeneration
settlegroup.org.uk



From: Alan Sherwell (Cllr) <Alan.Sherwell@buckinghamshire.gov.uk>
Sent: Thursday, April 16, 2026 10:32 am
To: Peter Strachan (Cllr) <Peter.Strachan@buckinghamshire.gov.uk>
Subject: CIL v S106

Dear Peter,

The briefing to Councillors raised a question in my mind, which I didn't want to raise then as I understood what the briefing was saying, my issue wouldn't have been handled by a one sentence answer and there were lots of other people wanting information. I certainly didn't want to bring it up yesterday as thinks brought up at Council seem to get politicised (by one and all) sooner or later even when that is not productive. Of course, any issue can end up that way because of genuine differences of political opinion exist but it is often better to try to find common ground first!

I get that the Council wants to maximise the return to Buckinghamshire from development and to ensure that we get all the benefits from major developments, in particular, that we can. Of course, I haven't seen the calculations that led to the conclusion that it was better to retain S106 rather than move to CIL once developments reach 400 houses and it might be appropriate to expose more detail of the reasoning for that to members. However, that is not my main point. One of the main advantages of CIL is that it passes 15% (25% in some cases) on to the Parish Council. They can then do things with it that the Parish believes is to the direct benefit of Parishioners. This is, potentially, a significant factor in reducing opposition to development as well as an opportunity for Parishes to tackle pre-existing problems which are exacerbated by the development. That cannot be done with S106.

I am writing as a Ward Councillor, particularly concerned because I have a large development on the borders of my patch that has just received outline permission. There are developments in or bordering on Stoke Mandeville in your patch too. My concern is that the 400 house change to S106 cuts off significant funding to Parishes which would otherwise be used to tackle local issues resulting from local growth and also make development more difficult to sell to local people.

Having said all that, I do understand the difficulty of your position. I was leader of Aylesbury Vale when our 1996 plan was drawn up, so, I have very direct experience of the difficulty of balancing often contradictory demands.

So, I have a factual question and a rather broader one. The former is a detail on the calculation that led to the suggested 400 house threshold – namely when it is said that S106 brings in more money is that more money TO BUCKS COUNCIL or more money to THE COUNCIL AND PARISH COUNCILS TAKEN TOGETHER?

The broader issue in that, even if the threshold is changed, there will be a point at which a development would provide a significant sum to a Parish Council but nothing all if it is increased by just one house. That seems really unfair. Is there a way that this cliff edge can be ameliorated?

Sorry to go on so long but I thought it best to put my questions in context.

Happy to talk if that helps.

Alan

Cllr Alan Sherwell
Aylesbury West

From: SMITH, Greg B <[redacted]@parliament.uk>
Sent on: Friday, 29 May 2026 13:10:00
To: CIL North Consultation Mailbox <CILNorthConsultation@buckinghamshire.gov.uk>
Subject: [EXTERNAL] CIL Submission Comments

Follow up: Follow up
Start date: Wednesday, 03 June 2026 00:00:00
Due date: Wednesday, 03 June 2026 00:00:00

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Thank you for the opportunity to submit my comments on the draft Community Infrastructure Levy draft charging schedule.

I appreciate how complicated it is to develop an infrastructure levy that is fair and reasonable and doesn't stifle appropriate development but I am concerned at the impact on existing and potential future infrastructure deficits as the proposed schedule has several zero rate levies, especially as there is no explicit mention of Section 106 in the proposed schedule which would be critical to mitigate the infrastructure requirements of large developments if there is a zero CIL rate and would negate the need for CIL if properly drafted with local input.

In particular:

Flats - all areas of any number of units.
Strategic housing sites - no CIL for any large sites.
Greenfield housing Zone C Aylesbury

I also note that publicly-funded uses could include government funded projects like prisons or other central government projects which would need to contribute to infrastructure, especially if they are not in the Local Plan. There may need to be an additional category that deals with local public projects as these are more appropriate to be zero rated, and a CIL rate category for unplanned and unwanted projects that could be forced onto the county by government.

With regards to development on brownfield sites which should be encouraged, I appreciated that brownfield land can be more complex to develop in some circumstances and this might attract a lower rate to encourage land remediation for example (as is the approach used in other council areas), but some brownfield sites could reduce the developer's costs such as site entrances already formed or existing connections to services so a more nuanced approached is needed if a lower rate is not proposed so that brownfield developments don't impact negatively on infrastructure delivery for the wider community such as town centre parking capacity and education and healthcare capacity.

An overarching concern with having too much zero rated development is that local town and parish councils do not receive any contribution for local community facilities, and places the infrastructure burden too heavily on other CIL rated development. On any zero rated developments in the final schedule, parish and town councils must be included in any S106 discussions for relevant local civil or social infrastructure. This not only helps deliver the right infrastructure by the right council, but also helps the developer and planning system to engage more constructively with existing local communities with potentially contentious developments.

it is worth highlighting that the invitation to respond to the consultation is misleading as some residents may not have read the detailed documents thinking this phrase as true, but the proposed charging schedule clearly contradicts this:

"A Community Infrastructure Levy (CIL) is a fixed charge levied on new development ***(including all new dwellings)*** *calculated per square metre of gross internal area in accordance with national regulations and the local CIL charging schedule."*

I trust you will take these consultation comments into consideration when undertaking revisions to the CIL schedule.

Yous faithfully,

Greg Smith

WOOBURN & BOURNE END PARISH COUNCIL
Council Offices, Town Lane, Wooburn, Buckinghamshire HP10 0PS
Phone: 01628 522827 Email: clerk@wooburnparish.gov.uk
Website: www.wooburnparish.gov.uk Enquiries to: Clerk to the Council

Response from Wooburn and Bourne End Parish Council Re: Public Consultation on the Proposed Community Infrastructure Levy (CIL) in the North of the County

1. Introduction

This submission from Wooburn & Bourne End Parish Council responds to Buckinghamshire Council's (the Council) consultation on the proposed Community Infrastructure Levy (CIL) as part of the emerging Buckinghamshire Local Plan.

The scale of planned growth across Buckinghamshire requires a credible infrastructure funding mechanism that is transparent, proportionate, and responsive to local circumstances. CIL will be a key tool in ensuring development contributes fairly towards infrastructure, transport, schools, healthcare, flood risk and drainage, open space, and community facilities.

2. Strategic Position

The Council's growth ambitions and housing requirements will place significant pressure on infrastructure across the county. Existing communities should not be expected to absorb the impacts of new development without timely mitigation.

The CIL charging schedule should support sustainable growth, capture a fair share of land value uplift, preserve scheme viability, ensure infrastructure is delivered in parallel with development, and provide confidence to residents that growth is properly planned and managed.

3. CIL Rates

3.1 Evidence-led Viability Testing: Rates should be based on updated residual land value appraisals, benchmark land values, development typology testing, and sensitivity modelling for inflation, finance costs, and changing sales values.

3.2 Geographic Variation: A single countywide rate is unlikely to reflect market realities. Distinct market areas exist across Buckinghamshire including Aylesbury Vale growth areas, High Wycombe urban markets, rural northern settlements, and stronger south Buckinghamshire commuter locations.

3.3 Differential Charging Zones (illustrative only): Prime commuter / high value south Buckinghamshire £200–£300 per sqm; Mid-market urban areas £100–£200per sqm; Lower value northern / rural markets £50–£100 per sqm; Strategic regeneration or constrained brownfield £0–£100 per sqm.

3.4 Interaction with Other Costs: CIL must be considered alongside Section 106 obligations, Biodiversity Net Gain, environmental mitigation, affordable housing, higher borrowing costs, and construction inflation. Excessive cumulative burdens risk delayed delivery and viability appeals.

3.5 Prioritisation of Obligations: Affordable housing and essential on-site mitigation should generally take priority, with CIL calibrated around remaining viability headroom.

3.6 Indexation: Rates should be indexed annually using BCIS All-in Tender Price Index or successor methodology so that real contribution values do not erode over the Local Plan period.

3.7 Strategic Sites: Large strategic allocations should not avoid proportionate contributions through bespoke negotiations. **Wooburn & Bourne End Parish Council strongly opposes the replacement of CIL through only Section 106 contributions for Strategic Sites.** Town & Parish Councils must continue to receive the meaningful allocation of CIL in accordance with the principles and practice embodied in national legislation (Planning Act 2008, Localism Act 2011) and regulation (The Community Infrastructure Regulations 2010, as amended). Neighbourhood contributions must be equivalent to or greater than normal expectations, i.e. 15% up to the maximum permitted, or 25% with an adopted Neighbourhood Development Plan (NDP). It would be disingenuous for the Council to advocate for both NDPs to be developed at the town and parish council level, whilst removing any and all direct contribution to those bodies from Strategic Sites given the substantial level of development anticipated across the county.

3.8 Review Mechanism: The charging schedule should be reviewed at least every three years, or sooner if build costs or market values materially change.

3.9 Transparency: Publish annual statements showing CIL collected, allocated, spent, and unspent balances by settlement or locality.

4. Wooburn & Bourne End Parish Council Area

Wooburn and Bourne End face particular sensitivities due to settlement character, constrained road capacity, and pressure on schools, healthcare, and drainage networks.

Future development affecting this ward should contribute fairly towards highway improvements, school place expansion, healthcare/ GP capacity, flood risk and drainage resilience, Local Green Space, and green buffers preventing settlement coalescence.

Given comparatively stronger local market values, an indicative residential rate in accordance with the higher land values for South Buckinghamshire villages should continue to be levied through CIL, subject to detailed evidence and continued affordable housing viability.

Local constraints including sloping sites, access improvements, and landscape mitigation should be fully recognised within viability modelling.

5. Governance and Local Benefit

Residents are more likely to support growth where contributions are visible and retained locally. There is a strong perception within the South Buckinghamshire communities of funding and services reduction/ removal by the Council and not improvement.

The Council should publish annual CIL receipts and expenditure by locality, prioritise spending in areas accommodating growth, maximise neighbourhood allocations to town and parish councils as the appropriate neighbourhood authority, and coordinate CIL with Section 106 obligations to avoid duplication and delay.

6. Recommendations

1. Adopt an evidence-led charging schedule with differential geographic rates.

2. Ensure cumulative developer burdens do not undermine delivery.

3. Ringfence infrastructure funding for growth areas.

4. Maximise neighbourhood contributions from development in accordance with national legislation and regulation.

5. Protect the identity of Wooburn, Bourne End and Hedsor through green buffers, infrastructure improvements and local mitigation.

6. Review rates regularly in response to market and construction cost changes.

7. Deliver infrastructure alongside development, not after it.

7. Conclusion

The proposed CIL framework must strike a lawful, practical and meaningful balance between infrastructure funding and development viability.

If calibrated correctly, it can help secure sustainable growth across Buckinghamshire while protecting and enhancing established communities.

Strategic Sites must contribute to CIL for both the Council and town and parish councils given the step change in the cumulative impact of development.

CIL rates should be reviewed and, where relevant, uplifted annually to ensure they align with market land values.

Annual reporting of CIL receipts and expenditure at the settlement level should be published to maintain community confidence and transparency.

For Wooburn, Bourne End and Hedsor in particular, robust local mitigation is vital to protect the quality and character of the area. The full allocation of CIL alongside s106 contributions to the Council, in accordance with national legislation and regulation, is vital to ensure this mitigation can continue to be delivered.

On Behalf of Wooburn and Bourne End Parish Council