



GREATER CAMBRIDGE SHARED PLANNING

Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy Consultation Statement

1 Introduction

The Community Infrastructure Levy ('CIL') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. CIL only applies in areas where a local authority has consulted on, and approved, a charging schedule which sets out its levy rates and has published the schedule on its website.

Cambridge City Council and South Cambridgeshire District Council have always intended introducing CIL with consultations on a preliminary draft charging schedule and a draft charging schedule taking place in 2012 and 2013 before both Councils submitted draft charging schedules to the Planning Inspectorate for examination in the Autumn of 2014.

Several factors, which would have had a detrimental effect on the likely success of the CIL examination, and future operation of the proposed CIL, resulted in both Councils agreeing to withdraw the draft charging schedules in 2017. This decision to withdraw the CIL draft charging schedule was made with a view to resubmit a draft charging schedule once identified opportunities had been explored and only after the respective Local Plans had been adopted.

In late 2018 the Cambridge Local Plan and the South Cambridgeshire Local Plan were adopted by the respective Councils.

In August 2020 the 'Planning for the Future' White Paper was published by MHCLG which proposed abolishing Section 106 (S106) and CIL and replacing them with a consolidated Infrastructure Levy (IL) causing any LPA with CIL intentions to wait to see how the policy developed.

Following the Government's decision in 2024 not to pursue IL, the Councils have re-evaluated their positions. Noting announcements made by Greater Cambridge Partnership (GCP), that there are insufficient funds to deliver all of the strategic transport projects that were required to deliver the growth in the adopted Local Plans, and noting the ambitions for further accelerating growth in Greater Cambridge, the Councils consider that there is now a strong justification for the timely introduction of a CIL for the Greater Cambridge area.

An assessment undertaken by the Councils shows that £272m is still needed to deliver the strategic transport infrastructure necessary to deliver Transport Strategy that underpins the 2018 Local Plans. Adopting CIL will ensure that all developments will contribute to addressing this funding gap. The Councils expect CIL to generate between £25m and £50m over the plan period.

Section 106 planning obligations will continue to be used to mitigate the impact of development and will continue to be secured towards localised community infrastructure including schools, libraries, doctors surgeries, village halls, play areas, allotments etc.

The purpose of this document is to explain how the Councils have met the regulatory requirements. It explains the evidence used by the Councils to support the introduction of the CIL, the viability evidence that has helped establish the proposed rates, the consultation and publication of the charging schedules, and the Councils response to comments made during the consultation.

2 Consultation requirements

Before submitting a draft charging schedule for examination in accordance with section 212 of the Planning Act 2008, the charging authority must:

(a) make a copy of the draft charging schedule, the relevant evidence and a statement of the representations procedure available for inspection (i) at its principal office, and (ii) at such other places within its area as it considers appropriate;

(b) publish on its website (i) the draft charging schedule, (ii) the relevant evidence (to the extent that it is practicable to do so), (iii) a statement of the representations procedure, and (iv) a statement of the fact that the draft charging schedule and relevant evidence are available for inspection and of the places at which they can be inspected;

(c) send to each of the consultation bodies (i) a copy of the draft charging schedule, and (ii) a statement of the representations procedure;

(d) give by local advertisement notice which sets out (i) a statement of the representations procedure, and (ii) a statement of the fact that the draft charging schedule and relevant evidence are available for inspection and of the places at which they can be inspected;

(1A) The charging authority must invite representations on the draft charging schedule from such of the following as the authority considers appropriate (a) persons who are resident or carrying on business in its area; (b) voluntary bodies some or all of whose activities benefit the charging authority's area; and (c) bodies which represent the interests of persons carrying on business in the charging authority's area.

The charging authority must submit the following to the examiner:

(a) the draft charging schedule.

(b) a statement setting out (i) if representations were made, the number of representations made and a summary of the main issues raised by the representations, and a summary of how the representations received were taken into account, or (ii) that no such representations were made.

(c) copies of any representations made.

(d) where the charging authority modified the draft charging schedule after it was published in accordance with regulation 16, a statement of modifications, and

(e) copies of the relevant evidence.

3 Draft Charging Schedule Consultation

Cambridge City Council and South Cambridgeshire District Council (the Councils) undertook a 6-week consultation on their respective Community Infrastructure Levy draft charging schedules and evidence between Monday 16 February 2026 and Sunday 29 March 2026.

The consultation documents and background documents published were:

Draft charging schedules

- Cambridge City Council Draft charging schedule
- South Cambridgeshire District Council Draft charging schedule

Draft Instalment Policy

- Cambridge City Council Draft Instalment Policy
- South Cambridgeshire District Council Draft Instalment Policy

Statement of Representations Procedure

- Cambridge City Council Statement of Representations Procedure
- South Cambridgeshire District Council Statement of Representations Procedure

Supporting CIL Documents

- CIL Supporting statement
- Greater Cambridge Viability Report (BNP Paribas Real Estate)
- Greater Cambridge Infrastructure Statement

Background Documents

- Cambridge Local Plan 2018
- South Cambridgeshire Local Plan 2018
- Infrastructure Delivery Study 2015 (Peter Brett Associates LLP)
- Greater Cambridge Draft Planning Obligations Supplementary Planning Document 2026
- Cambridgeshire County Council Transport Strategy for Cambridge and South Cambridgeshire 2014
- Cambridgeshire County Council Local Cycling and Walking Infrastructure Plan 2022
- Cambridgeshire County Council Local Transport Plan 2015
- Cambridgeshire Active Travel Strategy 2023
- Greater Cambridge City Deal 2014
- Greater Cambridge Partnership Future Investment Strategy 3 2023
- Greater Cambridge Partnership Budget 2026-27
- Cambridgeshire and Peterborough Combined Authority Local Transport and Connectivity Plan 2023
- Cambridgeshire and Peterborough Combined Authority Bus Service Improvement Plan for Cambridgeshire and Peterborough 2021
- Cambridge Growth Company A place of national and global significance 2025

The Councils notified all consultation bodies and around 2,000 persons who had (a) responded to previous CIL consultations, or (b) who had responded to the Greater Cambridge Planning Obligations Supplementary Planning Document consultation, or (c) who had opted in to be notified about planning policy matters in Greater Cambridge generally.

On Wednesday 18 February a notice was published in the Cambridge Independent.

The Councils publicised details of the consultation as follows:

- 13 February: South Cambridgeshire Business newsletter article
- 16 February: Greater Cambridge Shared Planning LinkedIn post (3100 followers)
- 16 February: Greater Cambridge Shared Planning Facebook post (312 followers)
- 18 February: Greater Cambridge Shared Planning X post (134 followers)
- 9 March: Greater Cambridge Shared Planning LinkedIn profile post reminder

Presentations were given to stakeholders as follows:

- 27 February: Cambridge Ahead (a 50-member forum who produce data-driven insight, collaborate with policymakers, and champion the contribution Cambridge city region makes nationally and locally).
- 6 March: Cambridge Development Forum (a 31-member forum who act as a strategic voice, championing practical solutions to planning challenges and advancing the efficient delivery of high-quality, sustainable housing and commercial development).

- 11 March: The Councils viability consultants Quintic Advisory (previously BNP Paribas Real Estate) gave a presentation to developers and agents.

Officers took questions at the annual Parish Council Clerk Conference on 4 March.

Cambridge Ahead describes itself as a deeply committed, long-term voice for the Cambridge economy, dedicated to good growth that improves quality of life. On behalf of its (circa) 50 members they produce data-driven insight, collaborate with policymakers, and champion the contribution Cambridge city region makes nationally and locally.

Cambridge Development Forum describes itself as a collaborative platform Chaired by The Rt Hon. Lord Lansley CBE dedicated to supporting sustainable growth and development across four key regions: Cambridgeshire, Thames Valley, Greater Cheshire, and Norfolk & Suffolk. The UKDF acts as a strategic voice, championing practical solutions to planning challenges and advancing the efficient delivery of high-quality, sustainable housing and commercial development. It has over 30 Members.

News and details of the consultation were circulated by third parties including:

- Cambridgeshire News (11 February)
- Cambridgeshire Chamber of Commerce (25 February)
- The Cambridge Town Owl (3 February)
- Cambridge Cycling Campaign (26 March)

The Statement of Representations Procedure advised that:

- Documents were available to view at Council offices at Mandela House Cambridge and at South Cambridgeshire Hall Cambourne.
- Representations could be received in writing, by e-mail or through the completion of the online planning consultation platform.
- Representations may be accompanied by a request to be notified (i) that the draft charging schedule has been submitted to the examiner, the examiners reports have been published, that the charging authority had approved the charging schedule.

The Councils published a series of questions to help focus representations:

1. Who are you responding on behalf of?
2. Do you wish to participate in the CIL examination?
3. Do you agree that the Council should introduce CIL?
4. Do you agree that the Council has demonstrated a funding gap?
5. Do you agree that the Council has used appropriate evidence to inform the proposed rates?
6. Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
7. Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?
8. Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?
9. Do you agree that the Council has met all regulatory requirements?
10. The Council is allowed to use 15% of CIL receipts to improve the area close to where development took place. This is known as the 'neighbourhood portion'. Details of how this will work in Cambridge will be worked up over the next 12 months. If you have any comments on how you feel the neighbourhood portion should be distributed, please let us know.

4 Representations received to the consultation

The Councils received 630 comments from 138 respondents. 595 comments relating directly to the questions asked with 35 other comments received. Full representations received through the consultation platform are published on the Councils website. This includes letters where the respondent provided a clear answer to each of the consultation questions.

43 respondents provided representations by letter. Where the letter does not provide a clear answer to each of the consultation questions, the Councils have in good faith summarised the representation and where possible recorded whether the representation reflected a comment, objection, or support. The letters, along with the supporting information, have been published in full on the Greater Cambridge Shared Planning website on behalf of both Councils. Documents containing sensitive information have been reviewed but have not been published.

A small number of respondents used both the online consultation platform as well as submitting a separate letter. Where this occurred, the representation is presented in document '4.1 Representations received through consultation platform' and the Councils summary of the letter is presented in document '4.2 Representations received through letter summarised'. A small number of respondents submitted more than one representation (including duplicate representations). Where this occurred, both representations have been published. A small number of respondents provided online representations that were clearly in the wrong text field. Where this occurred, the Council has reassigned the representation to the best of its ability and in good faith.

5 Respondents per category

Resident	67	49%
Developer/agent/landowner	48	35%
Parish Council	10	7%
Charity/Not for profit organisation/Community Group	8	6%
Public body	4	3%
Other	1	1%

6 Responses to questions

	Comment	Object	Support
Q3. Do you agree that the Council should introduce CIL?	54	23	59
Q4. Do you agree that the Council has demonstrated a funding gap?	30	22	32
Q5. Do you agree that the Council has used appropriate evidence to inform the proposed rates?	32	47	18
Q6. Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments?	32	39	21
Q7. Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	35	25	22
Q8. Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	20	11	18
Q9. Do you agree that the Council has met all regulatory requirements?	20	17	18

7 Participation in CIL examination

35 parties expressed an interest in participating in the CIL examination.

8 Format of this report

This report summarises all the comments received following the consultation. Taking each question in turn the Councils have provided a response to all issues raised. A selection of positive and negative comments received have been included in each section to give an overall feeling of respondents were saying and who they were representing.

For specific comments refer to document '4.1 Representations received through consultation platform' which contains verbatim comments received through the consultation platform, document '4.2 Representations received through letter summarised' which contains summarised comments received via letter, and the Councils website where copies of all letters received have been published.

Question 3. Do you agree that the Council should introduce CIL?

The Councils received 136 responses of which 72% were in support of CIL being introduced with 28% opposed. Supporters recognised the benefit of charging all developments a CIL to tackle transport problems and the problem with relying on Section 106 as a solution to this issue. Objectors disagreed with the principle of introducing a tax on development. Others were concerned about the impact that CIL might have on economic growth.

Comments in support of adopting CIL include:

Cambridge Cycling Campaign (Charity/Community Group): "Yes, we support the introduction of a Community Infrastructure Levy. More investment is urgently needed in the sustainable transport network in Greater Cambridge for walking/wheeling, cycling and public transport to be a genuine option for everyone. In addition, building new transport infrastructure requires long-term thinking. Local authorities are best placed to plan and deliver new transport infrastructure when funding mechanisms are long-term and under their own control".

The Cambridge Group of Ramblers (Charity/Community Group): "It is essential that new development contributes to the public good as it is putting additional pressure on existing facilities. Section 106 contributions are inadequate on their own".

Dr Alan Lawrence (a resident): "Yes. There is a significant shortfall in the funding required to create a good transport network for walking and wheeling, and bus funding is unclear. Also the council will be better able to make long term plans given a reliable source of funding as opposed to piecemeal negotiations on S106s".

Comments against adopting CIL include:

Dino Zuvela (a resident): "Public transportation links and utilities have continually worsened, and there is little guarantee that additional levies and charges will directly lead to an improvement for the area's infrastructure. Potentially useful spaces are left unoccupied throughout Cambridge and surrounding areas, and additional levies will further disincentivise future development".

Solon Karapanagiotis (a resident): "In theory, a more investment-friendly policy is not to introduce CIL".

Wellcome Trust (Developer Commercial): "No. WGCL [Wellcome Genome Campus Limited] is fully aligned with the ambition for growth and as a key stakeholder and potential investor, feels passionately about seeing the full potential of Greater Cambridge realised. We understand the challenges to growth, not least the constraints of proper strategic transport infrastructure and understand the potential value of CIL as a possible mechanism to fund strategic infrastructure. WGCL is concerned about the impact of CIL on the deliverability and viability of development. The current economic climate is challenging, and commercial development in particular is sensitive to economic cycles and changes in demand, competition, rents, yields, debt availability, land and other costs. Having a CIL charge (at the proposed rate), in uncertain conditions could have the effect of constraining development altogether. Further, CIL rates cannot be easily reviewed – a full examination process is generally required and so a CIL charge is absolute, it provides little opportunity to be responsive to challenges and changes in the economy / market. To the contrary, Outline Permissions with a s106, whilst legally binding, have mechanisms that enable review in exceptional circumstances. Even if CIL does not have this damaging effect, the mechanics are such that it will not contribute meaningfully to support wider growth. Receipts from emerging site allocations will only arrive at some distant time into the future. Thus, relying on CIL to deliver strategic infrastructure projects required now, is challenging, with little control over obtaining the funding and limited ability to forward plan for such infrastructure projects".

Council response to Question 3.

Developer contributions are secured in one of two ways:

- Section 106 Planning Obligations (s106) are negotiated agreements that seek to mitigate the impact of development. Contributions are secured towards localised community infrastructure. Their strength is in responding to market conditions and providing assurance to decision takers and stakeholders by securing ring-fenced contributions to projects at the point planning permission is granted. Their weakness is that each request needs to be evidenced and specified projects can only be changed to an alternate project with the developer's agreement. Government Guidance published in 2005 (the ODPM Circular 05/2005) unequivocally stated "planning obligations should never be used purely as a means of securing for the local community a share in the profits of development, i.e. as a means of securing a "betterment levy".
- CIL is a planning charge, introduced by the Planning Act 2008, to help charging authorities deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations. New developments that create net additional 'gross internal area' of 100 square metres or more, or create new dwellings, are potentially liable for the levy. The strength of CIL is that it is non-negotiable with receipts capable of being pooled and used to fund broader infrastructure and not just to address the impact of the development. Its weakness is that CIL is only payable on new floorspace and some developments including affordable housing, self-build, and charitable developments is exempt from paying CIL.

Viability and deliverability

Concerns relating to viability, including the view that adopting a CIL will reduce levels of affordable housing, are addressed elsewhere in the report.

Fairness

Some respondents supported the principle of CIL as they believed that there has been a consistent under funding of essential social and physical infrastructure, necessary to support our communities. Others support the introduction of a CIL to ensure that small-scale developments, which currently escape paying significant contributions under s106, contribute to the area's infrastructure.

Previously, all dwellings built in Greater Cambridgeshire contributed to infrastructure.

The Cambridge Plan (2006) required all applicable residential developments to contribute towards open space and recreation improvements (including informal open space, children's and teenage play facilities and indoor and outdoor sports facilities) and towards community facilities to meet the additional need generated by the development (Policy 10/1 Infrastructure Improvements). Each 4-bedroom dwelling built in the city was required to pay £6,142 which with inflation would be equivalent to £9,668 in 2026 (using the Bank of England inflation calculator).

The South Cambridgeshire Development Control Policy DPD (2007) required all residential developments to contribute towards outdoor playing space (including children's play space and formal outdoor sports facilities) and informal open space to meet the additional need generated by the development (Policy DP/4 Infrastructure and New Developments). Later contributions were also secured from all residential developments towards indoor community meeting space. From 2009 each 4-bedroom dwelling built in the District was required to pay £4,258.90 which with inflation would be equivalent to £6,924 in 2026.

In the five years between 2009 and 2014 831 agreements were entered into in relation to minor residential developments (averaging 166 permissions per annum) contributing £4.147m to local infrastructure (equivalent to more than £6.5m in 2026).

In 2014 the Government published a Written Ministerial Statement which said, “Due to the disproportionate burden of developer contributions on small-scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought”. Since then, only major residential development has been required to contribute towards the type of infrastructure that everyone benefits from. Simply put 250 dwellings are built each year on small developments in Greater Cambridge and contribute nothing towards infrastructure.

Adopting CIL is the only way to ensure that all developments (regardless of scale) contribute fairly and proportionately. Were it not for the Government's proposal ('Planning for the Future' White Paper August 2020) to abolish s106 and CIL and replace them with a consolidated Infrastructure Levy (IL) the Councils would have adopted CIL by now.

No to tax

Some respondents are opposed to CIL as a form of tax.

The grant of planning permission results in an (often significant) increase in land value. This value is legally owned by the state because the 1947 Town and Country Planning Act nationalised development rights and therefore the value of those rights. Moreover, development is often only achievable because of the investment made by the public sector. For the last 80 years the Government has attempted to capture this value uplift (often called 'betterment' or 'planning gain'). A report published jointly by the University of Cambridge and the Town and Country Planning Association highlights that since 1945 there have been four separate national taxes on the development value of land in the United Kingdom; the Development Charge (1948-1952), the Betterment Levy (1967-1970), the Development Gains Tax (1973-1976), the Development Tax (1976-1985).

CIL was introduced by Part 11 the Planning Act 2008. In making the Regulations the Secretary of State said the aim to ensure that the overall purpose of CIL is to ensure that costs incurred in supporting the development of an area can be funded (wholly or partly) by owners or developers of land in a way that does not make development of the area economically unviable. The CIL Regulations were introduced in 2010, and it has been adopted by more than half of authorities. By not adopting CIL funding gap has been created.

Section 106 delays and the “wriggling out” of s106 'obligations'

Some respondents commented that the flexibility afforded through negotiated s106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms. Others highlighted that developers were adept at “wriggling out” of s106 obligations.

In introducing the CIL Regulations the Government sought to restrict the use of s106 contributions use in two ways; first by imposing a restriction whereby no more than five s106 contributions could be used to fund an item of infrastructure (the pooling restriction), and second by putting into law three tests (the ODPM Circular 05/2005 used five tests as guidance) stating that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.

Whilst amendments to the Regulations have since removed the pooling restriction it is widely accepted that s106 agreements are an ineffective tool as they cannot be used as a means of capturing value uplift achieved from the grant of planning permission, because they cause delays in the planning process, and because the subjective nature and application of the three tests creates the ability for the applicant to negotiate down their contribution to infrastructure. S106 can therefore be attractive to applicants but not always to the planning authorities or those organisations responsible for delivering infrastructure.

It takes 22 weeks on average to complete an agreement following planning committee. For commercial developments the delay is 39 weeks. This is because the finer detail of the agreement takes time to negotiate and requires all parties with a legal interest in the land to sign it.

On 5 March 2025 Cambridge City Council resolved to grant planning permission (ref 24/03088/FUL) for a hybrid application for a) an outline application for the erection of a new retail and food & beverage block and b) a full application for the demolition of existing buildings, enabling works and redevelopment of the site to provide a new building containing office floorspace at 230 Newmarket Road, Cambridge.

Para 8.86 of the committee report highlighted the position of the County Council at that time. It said “The timescales for any future GCP scheme are unknown at the current time, however a financial contribution is sought to assist in the delivery of future GCP schemes within the local area. A total of £1,230,360 is sought, which will be secured via any subsequent S106 Agreement”. Planning Committee resolved to grant planning permission subject to (among other matters) “the completion of a Section 106 Agreement, the precise contributions and wording of obligations delegated to Officer”.

Later, under challenge from the applicant, the County Council amended their position to seek a contribution of “...£767,000 (minus the approx. £200,000 for the Newmarket Road crossing, and £30,000 for a potential residents parking scheme) making it £537,000 for the Eastern Access Scheme”. In the view of the County Council this “...is CIL compliant as this is in scale to other similar developments, and is necessary to help deliver a wider package of measures to improve access by all sustainable modes of transport and mitigate the development”.

One year after planning committee resolved to grant planning permission the s106 agreement will secure (a) a contribution of £30,000 towards Bottisham Greenway (including cycle lane improvements to riverside), (b) a pedestrian crossing across Newmarket Road or the payment of £210,000 in lieu, and (c) a contribution of £30,000 to implement parking restrictions near the site.

Adopting a CIL will mean that many planning permissions can be issued sooner with clarity as to what the application will be required to contribute towards strategic transport infrastructure. This is particularly the case for commercial developments.

There is, however, still a place for s106 agreements and the Councils have adopted the Greater Cambridge Planning Obligation Supplementary Planning Document explaining when contributions are required and how they are calculated. In summary a CIL will be used to fund strategic transport projects and Section 106 agreements will continue to be used to fund site specific transport infrastructure and local infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure.

The concept of CIL is well founded and despite several Government reviews has survived. The focus should therefore be on whether evidence supports the introduction of CIL, whether appropriate rates have been set, and whether it is clear how section 106 contributions will be used once CIL is adopted.

Question 4. Do you agree that the Council has demonstrated a funding gap?

The Councils received 84 responses of which 59% agreed that a funding gap had been demonstrated with 41% opposed. Supporters recognised there being a clear funding gap. Objectors said the infrastructure evidence is out of date, that there is no gap, that the gap is smaller than reported, that the gap is larger than reported, that mismanagement is to blame.

Comments agreeing that the funding gap had been demonstrated include:

Cambridge Area Bus Users: "Yes. Cambridge Area Bus Users agrees that the Council has demonstrated a funding gap, however the consultation vastly underestimates its size".

Croudace Homes (Developer Housebuilder): "Yes, the infrastructure statement identifies a significant funding gap between the transport related infrastructure costs, and the committed funding. The funding remains uncertain, as even with the projected CIL money, there is still a large gap, and with inflation and delayed large infrastructure across the region there is still uncertainty as to how the gap will be closed".

Great Shelford Parish Council: "Yes, although the Parish Council does not necessarily agree with all the projects listed in the Infrastructure statement, for example it is opposed to CSET2. It also wishes to note that the scaled-back Sawston Greenway proposals are very disappointing, particularly through the village and Stapleford".

Comments disagreeing that the funding gap had been demonstrated include:

Mr Michael Brown (a resident): "The funding gap would be better closed by not wasting money on absurd schemes such as the "Birthday Cake" roundabout on Milton Road".

Newlands and Tritax (Developer Commercial): "We note that the Chancellor has announced £500m of funding to Greater Cambridge and would query whether that has been accounted for in this exercise. Also, the GCP Draft Budget for 2025/26 shows that £809m is required to deliver the projects. It shows funding of £810m, including a 'local contribution' including circa £27m from New Homes Bonus and £230m assumed Section 106 income. We would query why the full assumed Section 106 obligations sum (£230m) has not been accounted for in arriving at the funding gap".

Wrenbridge (Developer Commercial): "The Infrastructure Statement published in support of the Draft CIL Charging Schedule acknowledges the importance of transport infrastructure to the delivery of growth across Greater Cambridge. While it adequately quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The Statement indicates that the proposed infrastructure programme 'builds on' the adopted 2018 Local Plans for Cambridge City and South Cambridgeshire. Those Plans, in turn, relied on the Transport Strategy for Cambridge and South Cambridgeshire (adopted in 2014). In parallel, the Greater Cambridge City Deal was agreed to support delivery of transport schemes; however, the City Deal programme was never formally assembled to support the emerging Local Plans at that time. As a result, the current project list appears to be carried forward from a historic funding programme, rather than derived from a demonstrable assessment of necessary transport infrastructure. On this basis, the infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence' (PPG Paragraph 020). In its current form, the Infrastructure Strategy does not sufficiently evidence the need of the transport projects it relies upon".

Council response to Question 4.

The CIL Regulations and guidance require charging authorities to identify the total cost of infrastructure they wish to fund wholly or partly through the levy. In doing so, they must consider what additional infrastructure is needed in their area to support development, and what other sources of funding are available, based on appropriate evidence. This process helps the charging authority identify the infrastructure funding gap and a levy funding target.

Information on the charging authority area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken when preparing the relevant plan. This should be set out in an infrastructure funding statement which identifies the infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions, and the choices the authority has made about how these contributions will be used.

The CIL examination will not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant plan. Planning guidance recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. It says that any significant funding gap should be considered sufficient evidence of the desirability of CIL funding, where other funding sources are not confirmed.

The TSCSC and City Deal has not been adequately tested

A respondent comments that the overall package on which the CIL is predicated (the TSCSC and the City Deal) has not been adequately tested to demonstrate the need for the schemes and the relationship with the development strategy.

For Cambridge the transport evidence was addressed in Issue 14 of the Cambridge Plan examination – 'Whether the Plan makes adequate provision for new transport and related infrastructure'. The examiners concluded that "Where necessary the Areas of Major Change identify specific infrastructure requirements. Taken together with the generic policies relating to transport and other infrastructure provision we consider that the Plan makes adequate provision for new infrastructure to support development".

Policy 5: Sustainable transport and infrastructure of the Cambridge Plan states "Development proposals must be consistent with and contribute to the implementation of the transport strategies and priorities set out in the Cambridgeshire Local Transport Plan (LTP) and the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC). Cambridge City Council, Cambridgeshire County Council and developers will work together to achieve the objectives and implement the Cambridge specific proposals in the LTP and the TSCSC, with particular emphasis on securing modal shift and the greater use of more sustainable forms of transport. In addition, Cambridge City Council will work with partners to support the implementation of transport schemes that will improve linkages across the region and by doing so increase the use of sustainable transport modes to get to and from Cambridge".

Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy states "Infrastructure provision will reflect the Council's priorities for infrastructure set out in the Cambridge and South Cambridgeshire Infrastructure Delivery Study and its successor documents. The Council will work positively with neighbouring authorities and Cambridgeshire County Council on infrastructure issues, including the Community Infrastructure Levy (CIL), which the Council is committed to introducing in 2014".

For South Cambridgeshire this was addressed in Issue 15 'Whether the Plan makes adequate provision for transport and related infrastructure'. The examiners concluded that "Subject to the inclusion of the MMs [main modifications] identified we are satisfied that the plan makes adequate provision for transport and other infrastructure requirements".

Policy TI/2: Planning for Sustainable Travel of the South Cambridgeshire Local Plan states "Developers will be required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions and/or the Community Infrastructure Levy (CIL), to address transport infrastructure in the wider area including across the district boundary".

Policy TI/8: Infrastructure and New Developments states "Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. The nature, scale and phasing of any planning obligations and/or Community Infrastructure Levy (CIL) contributions sought will be related to the form of the development and its potential impact upon the surrounding area".

The City Deal states the selected schemes will be assessed to ensure they deliver value for money (where the economic benefits of the scheme exceed the costs of investment and maintenance), contribute to City Deal, Local Plan and Local Enterprise Partnership objectives and can be delivered on time and to budget. Greater Cambridge will use the Department for Transport's Early Assessment and Sifting Tool methodology to support the prioritisation of schemes.

The Greater Cambridge Partnership (GCP) Assurance Framework provides the basis for Membership, Governance and Working arrangements and that projects are prioritised and delivered against four strategic objectives:

- Nurture the conditions necessary to unlock the potential of Greater Cambridge to create and retain the international high-tech businesses of the future.
- Better target investment to the needs of our economy by ensuring those decisions are informed by the needs of businesses and other key stakeholders such as the Universities.
- Markedly improve connectivity and networks between clusters and labour markets so that the right conditions are in place to drive further growth.
- Ease the labour market by investing in transport and housing, in turn allowing a long-term increase in jobs emerging from our internationally competitive clusters and more University spin-outs.

An initial indicative programme based on the TSCSC was established and agreed on 14 August 2014. Schemes under consideration for inclusion in the City Deal programme underwent a high-level assessment in line with criteria agreed between local partners and Government within the Assurance Framework. This ensured that schemes which offered maximum benefits and value for money were prioritised for investment.

Subsequently, the GCP has refined this approach through the development of a Future Investment Strategy (FIS) which includes a series of strategic prioritisation criteria, designed to ensure that schemes are prioritised which have the greatest potential to deliver the City Deal's objectives. The first FIS was drafted in March 2018 and updated in March 2019 (including evidence taken from the 2018 Cambridgeshire and Peterborough Independent Economic Review). It was updated again in December 2020 reflecting on the City Deal's priorities following the first Gateway Review of the Investment Fund.

On 28 September 2023 the Executive Board agreed FIS 3 which recognised that, because of external factors including considerable high inflation within the construction industry, the identified gap between funding to expenditure had increased from £111m to £278m.

The Councils do not agree that the transport evidence has not been tested.

The evidence is out of date and not sufficiently robust for the purposes of setting a Charging Schedule

Respondents have said that the evidence on which the Councils are relying to introduce CIL is dated or is out of date. Some respondents consider that the Council should, or even need, to wait to introduce CIL following the adoption of the Greater Cambridge Local Plan and the infrastructure delivery plan being prepared in relation to that plan. On behalf of several clients a respondent claimed that the transport context, costs and deliverability have changed significantly since 2014.

The evidence is not out of date. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) adopted by Cambridgeshire County Council on 4 March 2014 provides a plan to cope with the rising population and increase in demand on the travel network because of the 44,000 new jobs and 33,000 new homes that the respective Local Plans created in Cambridge and South Cambridgeshire.

The TSCSC identified a series of interventions along each of the corridors. An example of these is the Haverhill to Cambridge corridor. Whilst Haverhill lies in Suffolk, like many of the market towns surrounding Cambridge, it looks to the city as a regional centre for employment, retail and primary healthcare. Along or near the corridor lies a cluster of research and knowledge-based industries at Granta Park, the Babraham Research Campus and nearby at the Genome Campus, all of which are significant employment locations. The principal villages within the corridor are the Abingtons and Linton with other smaller villages located off the A1307. The TSCSC identified a series of short-medium and long term solutions including a Busway/HQPT (high quality public transport) along the line of former Cambridge-Colchester railway.

This scheme is now known as CSET (Cambridge South East Transport) for which a Transport and Works Act Order application was submitted on 9 January 2025. Whilst some parties may disagree with the proposed solution for dealing with congestion along this route (the representation made by Great Shelford Parish Council highlights that it is opposed to CSET2) few would consider that the Haverhill to Cambridge corridor does not still require any long term solution to a problem which will be exacerbated from growth in Haverhill and from job creation at the aforementioned employment sites.

The Infrastructure Statement produced by the Councils, with input from Cambridgeshire County Council and the Greater Cambridge Partnership, explains that in 2018 the cost associated with delivery of the strategic transport infrastructure necessary for the local plans was £855m. The present-day cost exceeds £891m.

At the same time only £618m of funding is identified (including a Government City Deal contribution of £500m and other grant funds).

A gross funding gap of £272m exists and so the Councils are justified in introducing a CIL to help address this gap.

The TSCSC remains relevant and is a fundamental tool in identifying the infrastructure required to accommodate growth and for directing funding sources. It is as relevant now as it was in 2014 and is appropriate evidence in the adoption of CIL.

There is no funding gap because the Government will fund infrastructure

Respondents have suggested that there is no longer a funding gap in large part because of recent speeches made by Rt Hon Rachel Reeves where the Government has promised £800m across the OxCam corridor to fund infrastructure.

On 23 October 2025 Rt Hon Rachel Reeves made a statement in which it was said the government is going further and faster on growth with over £500 million investment for new homes, infrastructure and business space for the Oxford to Cambridge Growth Corridor. It said that up to £400 million of initial government funding will kickstart development in Cambridge with affordable homes, infrastructure and business expansion.

On 17 March 2026, the Rt Hon Rachel Reeves gave the Mais lecture at Bayes Business School during which the following statements were made:

“First, we are backing the Oxford-to-Cambridge Growth Corridor to unleash the potential of our science and technology powerhouses, and the towns and cities between them:

- Investing £2.5 billion in East-West Rail;
- Fast-tracking new reservoirs, in Oxfordshire and Cambridgeshire;
- Backing the expansion of Luton Airport...
- And providing over £500 million for transport in Oxford, housing in Cambridge, and in a new Cambridge Innovation Hub.

We have already announced a consultation on a Development Corporation for Greater Cambridge – and I can today announce that we will consult on a Development Corporation for Greater Oxford too. I am doubling the government’s initial £400 million commitment in Cambridge, making over £800 million available for upfront land acquisition and infrastructure to support these cities to grow”.

Through the City Deal the government has already committed £500m to fund the TSCSC. Further funding has been secured from (for example) the Transforming Cities Fund and Innovate UK funding. The Chancellor’s Spring Budget announced on Wednesday 6th March 2024 allocated £7.2 million for the next phase of developing the Cambridge South East Transport (CSET) programme, ensuring the Cambridge Biomedical Campus is connected and accessible as it grows. Homes England have made around £23m available through a grant to fund the relocation of Waterbeach railway station to support the new town. Government funding has always been required to deliver the growth agenda. Any additional funding will assist but does not in itself remove the need for developers to contribute.

The gap is smaller because section 106 income is greater than reported

Respondents have highlighted that the GCP draft budget 2026/2027 includes a ‘Funding’ item of £230,771,000 for ‘Section 106 contributions’ and that this is considerably higher than the £60m figure that has been used by the Council. If the GCP published figure is accurate, the claim is that the gross funding gap would be significantly smaller (around £100m).

The Councils have undertaken their own analysis of s106 agreements for planning permissions the Councils have issued. This demonstrates that only £60m has been secured including £20m for the Bourn Airfield development. The GCP draft budget figure includes a figure of £186,555,000 for ‘future years budget’. With all allocations now benefiting from planning permission no significant additional funding is expected during the plan period. A list of all Section 106 agreements that has contributed towards GCP projects is published at Appendix A.

The gap is greater than the Council say

Respondents have commented that the gap is larger than that the Councils have published because the Councils have relied almost exclusively on the projects being delivered by GCP. Reference is made to the infrastructure items identified by the Cambridgeshire and Peterborough Combined Authority, such as those outlined in the Bus Strategy, which are crucial for achieving its local transport vision. A respondent states that the infrastructure gap is actually closer to £400m because (a) the cost of CSET is £184m and not £160m, (b) the budget for the Waterbeach busway has been £109.4m since September 2023, (c) other budgeted costs have not been updated to account for construction inflation, and therefore understate the funding requirement.

The Councils do not disagree that the true funding gap may be greater than quoted. The Infrastructure Statement explains that transport projects are identified from various studies and strategies produced including the TSCSC, the LCWIP, Active Travel Strategy, Capital Programme and other development specific proposals. The details of these projects are included in the County Council maintained Transport Proposals Database. Table 7 of the Infrastructure Statement shows TSCSC schemes to be delivered by Cambridgeshire County Council but where the cost of these has not been included in the funding gap.

The Infrastructure Statement further explains the role of the Cambridgeshire and Peterborough Combined Authority and the role of the Local Transport and Connectivity Plan (LTCP) as the Combined Authority's long-term strategy to make transport in Cambridgeshire and Peterborough better faster, greener, and more accessible for everyone. The Councils considered that, with a gross funding gap of £272m being demonstrated it was not necessary to include further transport projects but clearly if those projects had been included then it would have increased the funding gap further.

How will the remaining infrastructure costs be addressed

National guidance has always stated that, whilst CIL is expected to make a significant contribution, it cannot be expected to pay for all the infrastructure required. CIL is expected to generate between £25m and £50m during the plan period to 2031. A funding gap will remain following the introduction of CIL which partners will look to address through other means.

If there is a funding gap, mismanagement of funds is to blame

Strategic transport projects have been prioritised and delivered by GCP. The executive board is responsible for commissioning projects funded by money provided through the City Deal and for overall control of that programme of investments. The board comprises three elected members with full voting rights (one from each of the three partner councils) and two non-voting members co-opted by the executive board; one nominated by the business board, and one nominated by the University of Cambridge.

To unlock the full £500m GCP needed to demonstrate success through two gateway reviews (in 2019 and 2023) both of which were successful. The Councils have no concern regarding the governance or decision making of GCP. In writing to confirm that GCP had passed the 2019 review, Simon Clarke MP, Minister for Regional Growth and Local Government, said: 'We are pleased to see that GCP has made significant progress on its investments over the last five years and are grateful for your work on this.'

Mr Clarke added that the Gateway Review 'highlighted several significant successes across the deal to date' and he commended local partners for their 'focus' on delivering projects in line with local priorities across GCP - and for 'the strong partnership that [GCP] has built to support the successful delivery of the deal and improve the local economy'.

Question 5. Do you agree that the Council has used appropriate evidence to inform the proposed rates?

The Councils received 97 responses of which 28% expressed the view that the Council had used appropriate evidence to inform the proposed rates with 72% opposed. There was a range of views the majority of which centred on the viability evidence published by the Council. Developers/agent/landowners were responsible for the majority of comments.

Comments agreeing that the Council had used appropriate evidence to inform the proposed rates include:

Bar Hill Parish Council: "Partially. Bar Hill Parish Council recognises that the proposed rates are informed by viability evidence and supporting analysis. However, given the scale of infrastructure requirements identified in the supporting statement, it is not entirely clear whether the proposed rates will generate sufficient revenue to meaningfully contribute towards addressing the identified funding gap. The Parish Council therefore encourages the councils to provide additional justification explaining how the proposed rates have been determined and how they are expected to contribute towards infrastructure delivery.

Histon and Impington Parish Council: "Yes. Yes, broadly but with important caveats that must be recognised. Histon & Impington Parish Council accepts that the viability evidence appears to follow national guidance, including use of residual land value methodology, typology testing and analysis of local market conditions. The approach taken is broadly appropriate for strategic plan-making and for setting indicative CIL rates.

However, we also recognise the limitations raised in the DWP response, which remain important:

The viability assessment is deliberately high-level and does not reflect site-specific costs or constraints, particularly in complex village or edge-of-city locations.

The assessment is sensitive to assumptions about sales values, build costs and developer profit margins, all of which remain uncertain in the current economic climate.

In some scenarios, higher CIL could place downward pressure on affordable housing levels, creating a tension between competing policy goals.

On balance, the evidence is sufficient for consultation, but must be applied with caution going forward. Implementation should allow for appropriate flexibility, monitoring and responsiveness to changing viability conditions.

Jonathan Jones (a resident): "The councils have produced a viability assessment to support the proposed rates. However, this is a high-level area-wide exercise, and the evidence for the precise calibration of the rates particularly the very high office/R&D rate and the decision not to differentiate geographically appears more judgment-based than fully granular".

Comments disagreeing that the Council had used appropriate evidence to inform the proposed rates include:

Biomed Realty: "The viability evidence prepared by BNPP is deemed inaccurate, lacking robustness and market realism to support the proposed CIL rates, raising concerns about its credibility. The assumptions regarding costs, values, and developer margins do not reflect real market conditions, leading to unrealistic conclusions about the feasibility of CIL payments. The introduction of CIL at the proposed levels may undermine policy objectives, negatively impacting sustainability, design quality, and affordable housing provision. There are concerns that the necessary developer engagement as per national guidance has not occurred, questioning the evidence's compliance and soundness. The Infrastructure Statement lacks a clear justification for the identified transport projects and relies on outdated evidence from previous plans and strategies. The current Infrastructure Delivery Strategy indicates that CIL will generate only £50 million, which is insufficient to address the identified funding gap of £222.371 million. The Draft Charging Schedule cannot be justified

based on an infrastructure strategy that is inadequately evidenced and not demonstrably deliverable.

Bloor Homes: "Bloor is concerned about a number of the inputs and assumptions within the BNP Paribas CIL Viability Assessment which has informed the proposed rates as follows:
Benchmark Land Values: the viability assessment applies a BLV of circa £150,000 per gross acre for smaller sites, which may not meet landowner expectations. We would expect BNP Paribas to test a range of say £150,000-£200,000 per gross acre for smaller sites.

Affordable housing values: The capital values which are adopted for the affordable housing tenures are not clear within the report. These need to be set out please, as the blended capital value for affordable rent of £293psf is considered to be too high, especially when it is compared to the private values. With private values at £372psf, the affordable rent would be close to 80% of private values.

External works: although base build costs appear to be reasonable, the application of 10% external works for flats and 15% for houses on base build costs is low in the current market and would not account for any site abnormal development costs, such as earthworks, piling, significant utilities requirement etc. We would suggest that external works are set at a minimum of 20% for all types of housing.

Professional fees: 7% has been applied in all scenarios, which appears to be a little light and should be at least 8%-10% for schemes of a few hundred homes, in order to take account of planning costs and fees.

Biodiversity Net Gain: the costs of BNG can vary significantly depending on the land available on-site and the nature of ecology to enhance. 1.4% of base build costs may not be a sufficient sum, especially if off-site credits are required to deliver 20% net gain in biodiversity. According to Biodiversity Units UK, credits in the south of England range from circa £25,000 to £203,000 per credit.

Sales Rate: The report needs to clarify whether the sales rate of 6 sales per month is for all tenures, or just private units. It should be the case that no more than 3 private sales per month per outlet is applied to the appraisals.

Developers profit: A profit margin of 17.50% on GDV for private residential is inadequate and this should be a minimum of 20% on GDV. With the affordable at 6% affordable, this would still be circa 17.50% on GDV as a whole, which is in the middle of the PPG range for profit in relation to viability assessments.

Lolworth Developments Limited: "In summary, the CIL viability assessment:

- 1 Is tested on a very limited range of scenarios which are not reflective of Cambridgeshire's stock of industrial premises;
- 2 Adopts a single build cost assumption that is lower than the BCIS build costs across many types of industrial development;
- 3 Fails to have regard to other costs including abnormal costs or provide an allowance for contingency;
- 4 Applies a single rental value of £195/sqm which fails to reflect the range of values associated with different types of industrial premises and is higher than actual rental values commanded across Cambridgeshire as a whole as well as each of the individual constituent postcode districts;
- 5 Adopts a single market yield assumption of 5% which is lower than the actual yield achieved across Cambridgeshire's industrial stock; and,
- 6 Identifies that CIL charging is only viable on greenfield sites under its own testing parameters.

This analysis demonstrates that the identified CIL rate cannot be justified. As a minimum, further testing is required in order to consider the impact of the changes to the various inputs that we have identified above. We believe that this will render the application of any CIL in respect of industrial development in Greater Cambridge to be unviable.

Council response to Question 5.

The CIL Regulations and guidance require charging authorities to summarise their viability assessment which should be proportionate, simple, and transparent.

As background evidence, the charging authority should also provide information about the amount of funding collected in recent years through section 106 agreements. Guidance explains how development should be valued for the purposes of the levy and how development costs should be treated.

Summary of comments

The Councils received specific comments regarding the viability appraisals from 32 respondents. The majority of these (22 in number) were from the same four respondents who had submitted representations on behalf of clients. Consequently, the same comments are often repeated.

Bidwells are responsible for nine viability representations. Savills are responsible for seven. Carter Jonas and Lichfields are responsible for three each. Whilst some of these representations were accompanied with supporting information not all were. Some of the supporting information was provided without context or evidence. Comments made on the viability appraisals are summarised as follows:

Rent/Sales

- Comment that industrial use rents are lower than those used by the Councils.
- Comment that purpose-built student accommodation rents are lower than those used by the Councils.
- Comment that there are differences in rents between lab space and offices and that the rent for mid-tech is lower than R&D.
- Comment that yields for prime industrial should be higher.
- Comment that rental values for R&D are third higher in Oxford than in Cambridge and yields 125 basis points stronger than those in Cambridge.
- Comment that the industrial typologies are not reflective of the types of schemes being brought forward in GC.
- Comment that it is not clear whether viability study reflects circulation space for flatted schemes.

Costs

- Comment that build costs in Greater Cambridge are higher than those used by the Councils.
- Comment that no contingency has been allowed for.
- Comment that the profit margin should be 20%
- Comment that fees should be 15%
- Comment that viability testing should incorporate net zero carbon requirements into the evidence base and that the viability report does not consider BREEAM standard
- Comment regards benchmark land value.

Typologies

- Comment that typologies should include co-living and retirement housing.
- Comment that offices, R&D and mid-tech should be reviewed as separate development types.

Other

- Question whether developer engagement has taken place as noted in paragraph 015 of the Planning Practice Guidance.
- Comment that, given the variations in sales values, more than one residential CIL rate should have been set.
- Comment that land values in Greater Cambridge are higher than those in the viability study.
- Comment regarding double counting.
- Comment regarding exemptions that should be applied.

The Councils have explained elsewhere in this report how CIL will interact with s106 agreements including demonstrating with real examples how the impact is largely negligible, especially on those developments already contributing through s106 agreements for transport infrastructure.

The Councils viability consultants (Quintic Advisory previously BNP Paribas) have assessed all the viability representations received and have provided a response to each. This is available at document '5.2 Quintic Advisory response to viability representations'.

Oxford City Council

Some respondents objected to the proposed rate of £175 for offices and R&D buildings with some highlighting that few Councils charge CIL on employment developments.

This rate is comparable to Oxford City Council started charging CIL in 2013. This included a rate (considering indexation) of £33.74 for office and R&D buildings. The Council adopted a new rate of £168.74 in August 2025 (now equivalent to £176.24). Respondents to the South Cambridgeshire CIL consultation stated that it is too early to draw any meaningful conclusions in relation to its effect on the delivery of development.

The challenges and objections received by the Council were similarly raised to Oxford. In Oxford the examiner explained that opposition focussed on the existing agricultural use value, the premium multiplier, assumptions about development costs, developers profit, infrastructure costs, the allowance for external works, the transparency of the viability appraisal evidence, and the timing of the introduction of a revised CIL rate. The scale of the increase in the proposed CIL rate is raised by several as an issue of major concern.

Despite these objections the examiner considered that the viability assessment was robust and that the rate proposed would not threaten delivery of office/R&D development in Oxford. The examiner concluded that the proposed rates are justified.

There is no demonstrable fall in R&D applications following the revised CIL in Oxford.

On the contrary in October 2025 Carter Jonas submitted a planning application (ref 25/02577/OUT) on behalf of Advanced Research Clusters GP Limited (ARC) for outline application for laboratory-enabled office buildings for research and development with ancillary commercial space (all within use Class E). Provision of car parking, landscaping and pedestrian and cycle route (all matters reserved) at Plots 8200, 8400 And 9200 Alec Issigonis Way And Plot 3000 John Smith Drive Oxford Oxfordshire. The application form says up to 73000 of new office/R&D floorspace will be created meaning a CIL contribution of up to £12.8m in addition to s106 contributions being sought by Oxfordshire County Council towards cycle improvements, bus services, rail.

The Councils consider this real life evidence demonstrates the strong viability of developments in this sector and the support for these rates.

Question 6. Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

The Councils received 92 responses of which 35% expressed the view that the Council had struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments with 65% opposed. This question provoked responses in relation to the extent to which CIL can close the gap (i.e. should CIL rates be higher) and whether certain sites should be exempt from CIL (strategic residential developments and business parks). Supporters were keen for developers to contribute accordingly whilst highlighting some risks associated with CIL, especially in different market conditions. Objectors claimed that the Council should be charging far more or far less than that being proposed, or not at all. Comments relating to viability continued to be made.

Comments agreeing that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments include:

Dr Nazima Pathan: (a resident) "It is essential that residents no longer bear the burden of developments and their negative impact on the environment we live in. Cambridge is a growth environment and developers should have more input to the cost impact of their profitable builds".

Girton Parish Council: "Yes. Yes, in principle but with recognised risks.

The proposed CIL rates appear proportionate and consistent with national guidance. The distinction between CIL for strategic infrastructure and Section 106 for localised mitigation is appropriate and important for Girton. However, the Parish Council notes the following risks: The assumption that CIL will be absorbed through reduced land values may not hold true where landowners maintain high expectations.

Higher CIL rates on marginal sites could affect the delivery of affordable housing.

Real-world viability may vary significantly in edge-of-city locations impacted by strategic developments such as Darwin Green and Eddington.

Effective monitoring will be required to ensure the balance remains appropriate as economic conditions change.

Girton therefore supports the principle, but emphasises the need for caution, flexibility and a clear approach to viability reassessment where necessary".

Trumpington Residents Association (Community Group): "Yes, we do and note that BNP Paribas' assessment suggests this balance could still be demonstrated with higher rates in real terms of CIL".

Comments disagreeing that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments include:

Bon Ward (a resident): "No - killing the goose that lays the golden egg".

Edward Leigh (a resident): "No. The viability of most sites is determined primarily by the land purchase price. For greenfield sites not in a flood zone, there is usually ample land value uplift to fund all necessary social and transport infrastructure and services, still return a healthy profit to the developer and pay the landowner multiples of the Existing Use Value of the land. The costs of all required infrastructure must be understood at the time the land purchase agreement is struck. Any lack of clarity or changes in policy that require additional funding will inevitably lead to viability assessments and trade-offs, most commonly to the proportion of affordable housing provided.

It appears from the Supporting Statement that the LPAs are not being honest with themselves, developers or landowners about what counts as necessary social and transport infrastructure and services that meet agreed or implied objectives on decarbonisation, biodiversity, social equity and inclusion, public health and activity, and managing traffic congestion.

Take, for instance, the Grange Farm development. The CSET Busway Extension is estimated to cost £30m. That site is proposed to be allocated for 2,589 homes, meaning that the developer contribution for that single piece of transport infrastructure would be £11,600 per dwelling. CSET itself is unfunded, so this development may be expected to contribute towards the cost of that too (since the extension would be worthless without a mostly congestion-free route for buses into Cambridge). There would also need to be new or significantly enhanced active travel routes to employment centres and other destinations along the A11 and A505, which have not been costed.

The Supporting Statement says, "Contributions towards County Council infrastructure (education and transport) varies considerably. Whilst many contributions are not required to contribute anything, other developments have paid the equivalent of £10,000 per dwelling." This might explain the shortfall in funding for the new Waterbeach railway station. More generally, it ignores the fact that much transport infrastructure in the region has been paid for by the Government to upgrade the A14 and A428, build Cambridge North and South railway stations, build the Cambridgeshire Guided Busway, and provide most of the funding for the GCP's infrastructure programme.

In other words, £10,000 per dwelling historically is wholly inadequate to cover the cost of building new schools as well as the transport infrastructure needed to make large developments sustainable in transport terms.

For reference, Hertfordshire County Council collects S106 payments of around £10,000 per dwelling to cover only the cumulative transport impacts of development

This is additional to transport infrastructure that is directly needed to make a site sustainable in transport terms (new road and active travel connections to the site and improved bus services).

It seems clear therefore that Cambridge, South Cambridgeshire and Cambridgeshire are not being anywhere near as ambitious as Hertfordshire about the infrastructure and bus service enhancements needed to support sustainable development or as realistic about the funding required to deliver it.

Only costs that are clearly signalled through policies are priced into land transfer agreements. It is therefore essential that Cambridge, South Cambridgeshire and Cambridgeshire set out clear and realistic infrastructure, service and funding requirements in their policies, including CIL.

If CIL is to help plug the funding gap (which is far larger than the Infrastructure Statement indicates - see answer to Q5), the LPAs should be proposing CIL rates that rise steeply over the next few years to a realistic long-term level. Delay in introducing the higher rate is justified only to allow recent land deals to proceed to a viable planning permission.

Therefore, it is essential that future CIL rates are published now so that they can be priced into future land deals. Annual inflation-based increments will not be sufficient.

Pioneer Group (Developer Commercial): "No. In combination with substantial Section 106 obligations and emerging policy requirements (e.g. BREEAM, affordable workspace, 20% BNG, minimum tree canopy), the proposed CIL charge would erode headroom, risking reductions in design quality, sustainability performance and affordable housing provision, and threatening delivery particularly for brownfield, high cost, phased schemes like the Grafton Centre".

Council response to Question 6.

The CIL Regulations and guidance require charging authorities to strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process.

Charging authorities should think strategically in their use of the levy to ensure that key infrastructure priorities are delivered to facilitate growth and the economic benefit of the wider area.

Zones

Some respondents commented that it is not entirely clear whether the proposed rates will generate sufficient revenue to address infrastructure pressures while maintaining development viability. They say that to address this issue zones should be considered to reflect that developments in some areas can afford to pay more than the proposed rates. Other respondents considered that zones should be introduced to exempt strategic developments and strategic employment sites from paying CIL altogether.

Differential CIL rates may be appropriate in relation to geographical zones within the charging authority's boundary; types of development; and/or scales of development.

In all cases, a charging authority that plans to set differential rates must ensure they consider if rates are set in a way which constitutes a form of subsidy under the UK's new subsidy control regime. Any subsidy which is so provided must be compliant with the requirements and duties set out in the Subsidy Control Act 2022.

The draft charging schedules propose rates by types of development but not by scale or geographical zones. Every new dwelling and office whether it is built in Abbey Ward or Arrington village will pay the same. The reasons for adopting this strategy are as follows:

As a form of taxation CIL should seek to avoid undue complexity. Having a uniformed charge across both Council areas is helpful for agents, landowners and developers.

The proposed CIL is not the primary developer contribution source. S106 contributions will still be secured to mitigate the impact of development. The CIL payment on minor developments is in the region of £5,000 per dwelling and on major residential developments in the region of £3,000 per dwelling (as CIL is not payable on affordable housing). Introducing CIL zones would capture only modest income increases. If the proposed CIL was the primary developer contribution source, in the same way that other Councils have approached CIL, then there would be a stronger case in introducing zones.

It is important to ensure that CIL does not undermine the compliance with broader planning policy objectives at a local and national level. In October 2025, the government and the Mayor of London announced a package of time-limited emergency measures to support housebuilding in London including a new, time-limited, partial relief from borough-level CIL. The CIL introduced across Greater Cambridge will effectively be ringfenced for strategic transport projects. Whilst important it cannot be at the risk of (for example) affordable housing or contributions for the expansion of the local primary school both of which would continue to be secured through a s106. CIL rates should not be set at the margins of viability but rather should include an appropriate buffer which the proposed rates take account of.

CIL should not influence negatively the respective Local Plan strategies for example by driving development to areas with lower CIL rates, especially where those may be the very areas that require the greatest transport investment.

It is not necessary for the Councils to consider exempting strategic development sites from paying CIL because all such sites have the benefit of planning permission and are therefore not liable to pay CIL on any development brought forward under those permissions. Following the adoption of the Greater Cambridge Local Plan it may be appropriate to review any adopted CIL charging schedule, and which may set rates based on geography and/or scale of development. This should not be taken to mean that the CIL rates for allocated sites will be set to £0.

Brownfield versus greenfield

A respondent highlighted that for greenfield sites there is usually ample land value uplift to fund all necessary social and transport infrastructure and services, still return a healthy profit to the developer and pay the landowner multiples of the existing use value of the land, the implication being that the Councils could consider setting rates based on the type of land being developed (i.e. a greenfield rate specific CIL).

The Councils are aware of other Councils adopting such an approach. The draft charging schedule in Uttlesford proposes £200psm on greenfield sites and £100psm on brownfield sites. The adopted charging schedule in West Oxfordshire secures £225 on greenfield land and £125 on land that has previously developed. The Councils are not currently proposing charging different amounts based on existing land uses, not least because for residential development the Vacant Building Credit policy already provides a considerable incentive to brownfield developments. Furthermore, there is no compelling evidence that the Greater Cambridge Area has a significant issue with the viability of redeveloping brownfield land, particularly in Cambridge, where greater densities are often achievable, particularly within its central business district around the station Council. The Councils will keep this under consideration in any future CIL.

Headroom and impact on affordable housing

Some respondents claim that development cannot afford to pay CIL in addition to s106 with some saying that the implication of introducing CIL is that developers would seek a reduction in affordable housing. The Councils are also conscious of the impact of national policy requirements including but not limited to the Building Safety Levy which has prevented some Councils from reviewing CIL charging schedules (as the levy has captured any additional value).

The viability report demonstrates that the proposed CIL can be afforded in addition to existing and proposed planning policy. For residential developments the adoption of the Planning Obligations Supplementary Planning Document means that, whilst unlikely, a development could be expected to contribute up to £20,000 per dwelling where the local infrastructure (particularly schools) cannot cope with the additional demand generated by the development.

The assessment carried out by BNP Paribas assumes a s106 contribution of £25,000 per dwelling thereby providing an additional buffer. Analysis of the s106 requirements of applications validated since the SPD was adopted shows that the s106 requirements for some developments falls below the viability assumptions.

The s106 requirements for an application in Linton (ref 26/00415/OUT) for 100 dwellings on Horseheath Road equates to around £21,000 per dwelling.

The s106 requirements for an application in Stapleford (26/00610/OUT) for 110 dwellings on Mingle Lane equates to around £13,000 per dwelling.

The s106 requirements for an application in Coton (26/01016/OUT) for 80 dwellings on Pendrick Close equates to around £13,000 per dwelling.

These examples demonstrate that there is sufficient buffer in the viability for CIL to be supported across residential developments not currently contributing towards strategic transports (the majority of which already do).

To suggest that introducing a CIL will negatively impact affordable housing provision, because of s106 contributions required by policy, is to misrepresent or misunderstand the premise on which the CIL is being introduced. Analysis of how CIL would impact major developments and strategic development sites has shown little material difference because CIL is replacing a s106 contribution. The net impact shows a marginal increase in overall contribution.

The following examples demonstrate the s106 value for planning permissions that have been issued by the Councils against the likely CIL liability assuming each dwelling is 80m² and 60% of the floorspace is CIL liable.

Planning permission for 1300 homes at land north of Newmarket Road was issued on 30 November 2016 ref S/2682/13/OL. An additional 91 dwellings have been approved with additional contributions secured. The combined deeds secure around £2,400,000 towards transport improvements to the Newmarket Road transport corridor between Airport Way and Elizabeth Way. This is equivalent to around £2,800 per dwelling in 2026. Introducing a CIL would increase the developer's contribution by around £200 per dwelling.

Outline planning permission for 1200 homes at Land North of Cherry Hinton, Coldhams Lane, Cambridge was issued on 18 December 2020 subject to a section 106 agreement completed on 14 December 2020 ref 18/0481/OUT. The deed secures around £2,400,000 for strategic transport, equivalent to around £2,500 per dwelling in 2026. Introducing a CIL would increase the developer's contribution by around £500 per dwelling.

Planning permission for 230 dwellings at Newbury Farm Cambridge was granted on 24 May 2021 ref 19/1168/OUT. The s106 agreement secures £345,000 towards the Greater Cambridge Partnership's Cambridge South East (A1307) Transport improvements to the A1307 between Addenbrooke's and Babraham Park and Ride equivalent to £1,500 per dwelling. If this application was determined once CIL was adopted the s106 contribution would not be required and would be replaced with a CIL payment of around £670,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,041 per dwelling.

Planning permission for 200 dwellings at Netherhall Farm Cambridge was granted on 7 January 2022 ref 20/01972/OUT. The s106 agreement secures £300,000 towards the Cambridge South East Transport improvements for the A1307 between Addenbrooke's and Babraham Park and Ride and which shall specifically be expended by the County Council upon the following: (i) the implementation of SCOOT signal control; (ii) delivery of improvements to the junction of Worts' Causeway with Babraham Road; and (iii) provision a greenway cycle route along the A1307 between Cambridge and Linton equivalent to £1,500 per dwelling. If this application was determined once CIL was adopted the contribution would not be required and would be replaced with a CIL payment of around £576,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,104 per dwelling.

Planning permission for 84 dwellings at 12 to 34 Fanshawe Road Cambridge was granted on 12 November 2024 ref 23/04686/FUL. The s106 agreement secures £152,000 to be used towards the Chisholm Trail equivalent to £1,908 per dwelling. If this application was determined once CIL was adopted the contribution would not be required and would be replaced with a CIL payment of around £245,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,034 per dwelling.

Planning permission for 120 dwellings at Barnwell Local Centre Cambridge was granted on 29 November 2024 ref 23/04687/FUL. The s106 agreement secured £278,000 towards the Cambridge Eastern Access project equivalent to £2,316 per dwelling. If this application was determined once CIL was adopted the CIL contribution would not be required because the development comprises only affordable housing.

Planning permission for 70 dwellings at 137 and 143 Histon Road Cambridge was granted on 12 March 2025 ref 24/01354/FUL. The s106 agreement secures £114,000 to be used towards improvements in the walking and cycling provision on Histon Road. If this application was determined once CIL was adopted the s106 contribution would not be required and would be replaced with a CIL payment of around £200,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,179 per dwelling.

The contribution is not enough and the contribution for transport is not enough

A respondent comments that developers could reasonably be asked to pay higher rates than those set out in the charging schedule. They highlight that the rate proposed for residential developments in Greater Cambridge at £60 per square metre is much lower than those charged by neighbouring planning authorities. Huntingdonshire District Council charges £152/m². East Cambridgeshire District Council charges £70/m² in Littleport and Soham, £123/m² in Ely and £159/m² in the rest of the district. The proposed rate is also less than half of the rate (£125/m²) which was proposed in 2014 for Cambridge City.

Another respondent comments that more money should be directed to transport infrastructure. They say that other Councils (Hertfordshire County Council specifically) secure £10,000 per dwelling for this.

The Hertfordshire County Council Guide to Developer Infrastructure Contributions Technical Appendix 1: Transport explains that each dwelling is required to pay £9,861 (indexed to March 2024) to meet the Active Travel funding gap.

At the same time the Infrastructure Funding Statement 2024/25 explains that the transport and travel contribution for the Harlow and Gilston Garden Town development (10,000 dwellings) was £26,609,823 (equivalent to £2,600 per dwelling). This contribution is directly comparable to the CIL rates proposed in Greater Cambridge. For the Harlow and Gilston Garden Town development the s106 contributions towards transport and travel represented less than 10% of the total value of the deed. Hertfordshire County Council report spending around £1,000,000 to £2,500,000 of s106 contributions each year on transport and travel projects.

As explained further in Question 7 the Councils will continue to use s106 contributions to mitigate the impact of development. As an early adopter of CIL, where the pooling restriction made the continued use of s106 agreements challenging, Huntingdonshire District Council relies heavily on CIL to fund infrastructure. Here s106 contributions are only secured on largescale major development (developments of 200 dwellings or more) although smaller developments can be required to contribute towards outdoor sports space. A development of 100 dwellings in Huntingdonshire can expect to pay around £800,000 in CIL. It is understood that East Cambridgeshire similarly has scaled back considerably the use of s106 agreements as a means of securing developer funding.

Analysis shows that the same development of 100 dwellings built in Greater Cambridge would require the following s106 contributions (assuming the schools are operating at capacity):

Education and libraries: £10,000
Healthcare: £1,000
Open space (including sports and children's play and allotments): £6,000
Indoor community meeting space: £1,500
Green infrastructure: £1,000
Indoor sports space and swimming: £1,000
CIL for strategic transport: £3,000

The total developer contribution in this scenario is around £23,500 (£20,500 for s106 contributions and £3,000 for CIL). With a total developer contribution of £2.35m its is clear the Councils will be seeking greater amounts than those secured by the referenced neighbouring authorities.

The respondent considers that greater importance should be placed on strategic transport infrastructure than other infrastructure typologies. The Councils disagree.

In the above example the contribution for strategic transport represents 13% of the total contribution. This percentage increases where less money is secured for s106 infrastructure. For example, where the s106 provisions total £13,000 then the total allocated for strategic transport increases to 20% of the total developer's contribution.

Broadly speaking therefore, the developer's contribution to strategic transport infrastructure is between 13 and 20% of their total contribution. The Councils consider this is appropriate when compared against competing priorities like education, health, and recreation.

In terms of commercial uses the proposed CIL rates exceed what is currently being secured through negotiated s106 agreements.

Planning permission for the new office and laboratory buildings at the TWI campus Granta Park Great Abington was granted on 24 January 2024 (ref 22/05549/OUT). The s106 agreement secures (a) £481,740 towards the improvement of the cycle route between High Street Babraham and Granta Park, (b) £160,580 towards measures intended to reduce the number of peak hour vehicular trips to the site. Analysis shows the CIL liability for the same development is up to £3,500,000, i.e. an increase of around £2,900,000.

Planning permission for a commercial and business use building at 10A Cheddars Lane Cambridge was granted on 24 January 2024 (ref 23/01457/FUL). The s106 agreement secures £102,400 towards pedestrian and cycle improvement works along Newmarket Road and/or Cheddars Lane/Riverside. Analysis shows the CIL liability for the same development is up to £230,000, i.e. an increase of around £127,000.

Planning permission for the part demolition of existing buildings and erection of new buildings for research and development including co-working space, cafe and gym at The Way Fowlmere was granted on 24 January 2024 (ref 23/02467/FUL). The s106 agreement secures £87,000 for Melbourn Greenway. Analysis shows the CIL liability for the same development is up to £770,000, i.e. an increase of around £684,000.

Planning permission for offices and research and development buildings at land south of Coldhams Lane Cambridge (ref 23/04590/OUT) was granted on 31 January 2025. The s106 agreement secures (a) £500,000 towards a cycle link, (b) £1,766,024 to the Fulbourn Greenway, (c) £679,240 to the Eastern Access project, (d) £271,696 to cycle and pedestrian improvements to the Brooks Road / Coldhams Land roundabout, (e) £407,544 towards the cost of the County Council (or others) delivering the mitigation agreed by the Transport Review Group. Analysis shows the CIL liability for the same development is up to £6,800,000, i.e. an increase of around £3,200,000.

Planning permission for the erection of an office and research and development building at 440 Cambridge Science Park Cambridge was granted on 7 April 2025 (ref 24/01079/FUL). The s106 agreement secures £860,255.50 less the actual cycleway cost towards strategic infrastructure improvement works on the (i) Milton Road corridor and (ii) the Chisholm Trail. Analysis shows the CIL liability for the same development is up to £2,300,000, i.e. an increase of around £1,400,000.

Planning permission for the erection of a research and development / office building at Dales Manor Business Park Sawston was granted on 9 July 2025 (ref 24/01473/FUL). The s106 agreement secures a contribution of £156,000 less the cost of providing footway improvements. The contribution would be used towards the Cambridge South-East Transport (CSET) Route, the Linton Greenway and/or the Sawston Greenway. Analysis shows the CIL liability for the same development is up to £745,000, i.e. an increase of around £590,000.

Planning permission for the conversion and extension of an existing research and development building known as The Franklin Building 2 at Granta Park Great Abington was granted on 1 October 2025 (ref 24/02507/FUL). The s106 agreement secures £98,000 towards CSET phases 1 and 2 or Linton Greenway, but principally to be used for the improvement of the cycle route between High Street Babraham and Granta Park. Analysis shows the CIL liability for the same development is up to £490,000, i.e. an increase of around £398,000.

Securing more from commercial developments, which can demonstrably afford to pay more, will ensure that key infrastructure priorities are better funded and greater certainty over delivery is achieved.

Research and development uses

Representations seek to justify why business and science parks should be exempted from CIL (including through the introduction of zones) because negotiated s106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.

The above analysis shows that s106 agreements are not securing as much money as developments can afford to pay. Furthermore, requiring a s106 agreement that include contributions towards strategic transport infrastructure can be evidenced to be the direct cause of delays in a planning permission from being issued. S106 transport contributions are also variable whereas CIL would introduce a stable expectation of development types, helping achieve faster permissions and level the playing field.

In maintaining S106 as a mechanism for securing transport contributions, there is also the risk that a more robust application of CIL regulation 122, particularly where challenged on appeal, can diminish its efficacy. This was underlined by the Hobson Street Cambridge appeal (APP/Q0505/W/25/3365274) where the Planning Inspector was unable to conclude that a request of £125,000 made by Cambridgeshire County Council towards the Hills Road corridor improvement scheme met the statutory tests.

On the developers side this latest point can be highlighted in the vast variation in transport contributions sought by Cambridgeshire County Council across the District and the challenge this creates in land acquisition. All these considerations point towards CIL as the solution for securing developer contributions on business and science parks.

Hotels and retail uses

A respondent commented that the rates for hotels and retail uses appeared to be low and yet the disruption caused by these developments can be considerable, especially for pedestrians.

The disruption caused is understood but should be minimised through the appropriate application and enforcement of planning conditions and highways agreements completed with Cambridgeshire County Council rather than through CIL.

CIL income

One respondent (commenting on behalf of several clients) repeated the statement that CIL is not worth introducing because £50 million “would fund only a small fraction of the identified projects”.

Analysis undertaken by the Councils highlight that introducing CIL will generate more funding than is currently being secured from negotiated s106 agreements for reasons previously explained in the report.

It is not agreed that £50m over the plan period constitutes a “small fraction” as a reason for not proceeding. Rather it reflects a total contribution equivalent to around 20% of the funding gap which is meaningful.

Question 7. Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?

The Councils received 82 responses of which 47% expressed the view that it is clear how CIL will operate alongside Section 106 Planning Obligations with 53% opposed.

Comments agreeing that it was clear how CIL will operate alongside Section 106 Planning Obligations include:

Gamlingay Parish Council: "Yes. However further detail is needed about how this will operate in the rural areas of Greater Cambridge, securing infrastructure for villages".

Jeremy Baumberg (a resident): "Yes. It is clear that this is a modest CIL, given that Section 106 is still the main resource".

Places for People (Developer Housebuilder): "Yes, it is clear how CIL will operate alongside Section 106 obligations and this has been clearly defined in the consultation".

Comments disagreeing that it was clear how CIL will operate alongside Section 106 Planning Obligations include:

Abbey Properties Cambridgeshire Limited: "It is not clear and clarification through the examination would be essential. It would be appropriate to adopt a SPD alongside the CIL schedule (if adopted)".

Cambridge Past Present and Future (Charity): "No. The current proposal creates a "bun fight" where transport infrastructure is positioned to receive its funding slice first. This creates an inequitable system where:

- Transport is prioritised at the expense of other essential services.
- Health, education, and green infrastructure remain reliant on Section 106, which will continue to fail to capture contributions from smaller sites. We argue that for a 'balance' to be struck, all infrastructure types must be funded equitably to address existing service shortfalls".

Trinity College (Developer Commercial): "The relationship between CIL and S106 for strategic sites requires clarification and is not adequately addressed. At present:

- There is insufficient explanation of the circumstances in which S106 obligations will be used to address infrastructure requirements at strategic sites rather than, or in substitution for, CIL.
- The Infrastructure Statement does not clearly identify which elements of the infrastructure programme are intended to be delivered through S106 at strategic sites, and which through CIL receipts.
- There is no clear explanation of how the Councils will avoid the double-counting of infrastructure contributions where a strategic site is already making substantial S106 commitments (for example, in relation to transport, utilities, public realm and employment floorspace delivery).
- There is no flexibility for employment led sites (the Councils merely identify a reduction in affordable housing on residential sites as a 'safety value' to overcome viability issues).
- There is no clarity on when infrastructure funds will be spent to support the delivery of strategic sites.
- Whereas 100% of s.106 contributions which are identified as mitigation for strategic transport will be spent on strategic transport, that is not the case for CIL whereby a significant proportion will be earmarked for other uses, significantly reducing the monies available for investment in strategic transport".

Council response to Question 7.

Planning guidance reaffirms that CIL is not intended to make individual planning applications acceptable in planning terms. As a result, some site-specific impact mitigation may still be necessary for a development to be granted planning permission. Some of these needs may be provided for through the levy but others may not, particularly if they are very local in their impact. There is still a legitimate role for development specific planning obligations, even where the levy is charged, to enable a local planning authority to be confident that the specific consequences of a particular development can be mitigated.

Authorities can choose to use funding from different routes to fund the same infrastructure. Authorities should set out in infrastructure funding statements which infrastructure they expect to fund through the levy and through planning obligations.

Charging authorities should work proactively with developers to ensure they are clear about the authorities' infrastructure needs and what developers will be expected to pay for through which route.

The confusion between how the Councils intend operating CIL and s106 is understood because CIL charging authorities' approach this differently to one another tailoring the approach to their own specific needs. With the pooling restriction not being withdrawn until 2019 early CIL adopters curtailed significantly the use of s106, often limiting its use for larger developments (and at times exempting those sites from paying CIL).

The Councils consulted on a joint Planning Obligations Supplementary Planning Document in 2024 and 2025. The SPD explains when contributions are required and how they are calculated. The SPD was adopted by Cambridge City Council in March and by South Cambridgeshire District Council in February 2026.

As confirmed through the Supporting Statement CIL will be used to fund strategic transport projects and s106 agreements will continue to be used to fund local infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure.

Some respondents have questioned whether the Councils approach leads to double counting. Respondents have asked whether a development would still be liable to pay s106 contributions for transport projects in addition to CIL.

The answer is that s106 contributions would no longer be sought towards strategic transport infrastructure projects and that s106 contributions and/or s278 agreements would still be required in relation to transport infrastructure that would not be necessary were it not for the development.

To demonstrate how this would work in practice the Councils have provided three examples of planning permissions granted in recent years.

Example A Hauxton Waste Water Treatment Works. 23/03080/OUT. Outline planning permission for the demolition of existing structures and redevelopment for employment (office and laboratory) floorspace alongside a new amenity building, country park and associated infrastructure at the former waste water treatment works Cambridge Road Hauxton was granted by South Cambridgeshire District Council on 25 July 2024. Through both planning conditions and planning obligations the immediate and broader impact of the development has been mitigated. Planning conditions secured (a) pedestrian and cycle infrastructure including the provision of a greenway to connect to a proposed mobility hub to the north and link to Haslingfield Greenway and public footpath to the

south-west; internal pedestrian and cycle links; and the accesses onto the A10, (b) a travel plan and parking management plan, and (c) a minibus service including hours of operation, number of services and days of service to be provided from the date of first occupation of the development and maintained in perpetuity. Planning obligations secured (a) the provision of two bus shelters, (b) a maintenance contribution of £20,000 in relation to those bus shelters, (c) a car park management plan, (d) a contribution of £5,000 towards the cost of introducing road signage and markings in the vicinity of the development restricting vehicle waiting times/periods, (e) a transport mitigation contribution of £682,000 towards Melbourn Greenway and/or South West Travel Hub. If this application has been approved following the adoption of CIL the only difference would be the removal of the £682,000 towards Melbourn Greenway and/or South West Travel Hub (a GCP related project) which would be replaced by the CIL payment.

Example B Station Road Longstanton. 20/03598/OUT. Outline planning for the demolition of a single dwelling and development of up to 107 dwellings and employment/community/ cafe development at Land West of Station Road Longstanton was granted by South Cambridgeshire District Council on 11 July 2022. Through both planning conditions and planning obligations the immediate and broader impact of the development has been mitigated. Planning conditions secured (a) travel Plan and appointment of a travel plan co-ordinator, and (b) footway/cycleway along the frontage of Station Road. Planning obligations secured (a) a contribution of £46,000 towards the improvement of connectivity between the development and Northstowe and/or Phase 1 and the Waterpark, (b) a contribution of £114,000 toward the provision of new cycle routes, or the improvement of existing cycle route which serve the development between Longstanton and Bar Hill and the St Ives Greenway, and (c) £96,000 towards the Cambridge Guided Busway capital cost. If this application has been approved following the adoption of CIL the contribution reference (c) would still be secured through a s106 with all of the financial contributions replaced by the CIL payment.

Example C Westbrook Centre Cambridge. 24/00622/FUL Planning permission for the demolition of existing buildings, retention and re-use of part of the undercroft parking structure, erection of employment floorspace at Westbrook Centre, Milton Road, Cambridge was granted by Cambridge City Council on 3rd September 2025. Through both planning conditions and planning obligations the immediate and broader impact of the development has been mitigated. Planning conditions secured a travel plan and parking management plan. Planning obligations secured (a) a contribution of £100,000 towards improvements to Jesus Green (including Rouse Ball Pavilion redevelopment), (b) pedestrian and cycle link schemes for Corona Road, Lilywhite Drive, and a permissive path scheme at Fellows House (where these schemes are not delivered £10,000 per scheme would be paid to Cambridge City Council), (c) a contribution of £15,000 towards controlled parking zone implementation, and (d) a contribution of £278,794 towards sustainable transport improvements at Milton Road / Mitcham's Corner. If this application has been approved following the adoption of CIL the only difference would be the removal of the £278,794 towards sustainable transport contributions at Milton Road / Mitcham's Corner (a GCP related project) which would be replaced by the CIL payment.

These three examples demonstrate in a practical sense how CIL and s106 would operate in the future.

Put simply localised interventions including the provision of a new pedestrian crossing point, the widening of an existing footpath, the provision of bus shelters, contributions to install real time passenger information displays at an existing bus shelter, contributions to fund additional waiting restrictions, travel plan monitoring would continue to be required and secured through planning conditions and planning obligations. CIL would replace the contribution currently being paid through a s106 for strategic transport.

Question 8. Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?

The Councils received 49 responses of which 62% agreed that the draft instalment policy strikes the right balance between income and developer cashflow with 38% opposed. There was a balance of comments many of which consider the draft instalment policy to be fair. Some respondents considered the policy to be too generous. Specific requests were made to review the thresholds based on build out rates.

Comments in favour of the draft instalment policy striking the right balance between income and developer cashflow include:

Cambridgeshire ACRE: "Cambridgeshire ACRE considers that the proposed instalment policy appears proportionate and provides a reasonable balance between ensuring timely collection of CIL receipts and recognising the cashflow constraints faced by developers. Staged payments for larger liabilities should help maintain development viability while still ensuring that infrastructure funding is secured. It will be important that the approach allows infrastructure investment to be delivered in a timely way so that communities see the benefits of development alongside growth".

Henry Boot Developments (Developer Commercial): "Support is given to South Cambridge District Council's proposed instalment policy, particularly in respect of projects with a CIL Liability of over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months".

Mrs Marilyn Ballisat (a resident): "Yes the balance is fair to developers and the council".

Comments against the draft instalment policy striking the right balance between income and developer cashflow include:

Cambridgeshire County Council and Prologis (Developer Commercial) "No, the thresholds are considered to be too low given the scale of payments that may be generated by the proposed CIL rates. We request that these are extended to improve the viability of development proposals. For very large contributions, the instalment policy should take a longer term approach. In Oxford the instalment policy for sums over £2m is: 1st instalment, 25% within 60 days; 2nd instalment, 25% by end of year 1; 3rd instalment, 25% by end of year 2; 4th instalment, 25% by end of year 3. This approach should be replicated given the similar CIL rates proposed".

Mr Zbigniew Ulanowski (a resident): "No, the policy is overly generous to developers".

Urban and Civic (Developer Housebuilder and Commercial): "No. The instalment policy has been designed with no obvious consideration of the cashflow profile of strategic scale development. On a Super Strategic Site, the master developer, not the housebuilder, bears the upfront capital risk: the multi-year negative cashflow period, the infrastructure-first investment, and the planning complexity. Urban&Civic, as master developer, commits its capital before housebuilders are on site. Any CIL liability would fall, in practice, on the entity least able to absorb a fixed, irrecoverable charge against a structurally negative cashflow position in the early phases of delivery. The housebuilder customers who build on our fully-serviced and de-risked parcels do so against a transparent cost structure. Introducing CIL into that structure, with crystallisation at outline consent or Key Phase Approval, would alter the investment arithmetic in ways that cannot be mitigated by instalment scheduling. The instalment policy addresses the timing of payment; it does not address the more fundamental problem that CIL, as an instrument, is structurally challenging with the economics and delivery mechanics of Super Strategic Sites".

Council response to Question 8.

The CIL Regulations and guidance states that where no instalment policy is in place, someone has assumed liability and a commencement notice has been submitted (and the authority has not determined a deemed commencement date), then payment is due in full at the end of 60 days after the intended commencement date.

Where a charging authority wishes to allow payment by instalments, they must have published an instalment policy on their website. An instalment policy can assist the viability and delivery of development by taking account of financial restrictions. Willingness to allow an instalments policy can be a material consideration in assessing the viability of proposed levy rates.

Where the planning authority is willing to accept it, a planning permission for a development can be subdivided into 'phases' for the purposes of the levy. This is expected to be especially useful for large scale development, which is an essential element of increasing housing supply. The principle of phased delivery must be expressly set out in the planning permission.

To understand the impact of the instalment policy it is appropriate to review when s106 contributions for strategic transport projects (which CIL is replacing) are paid.

23/00835/FUL for office and lab space at 460 Milton Road Cambridge secured a "Strategic Transport Contribution" of £460,833 towards strategic infrastructure works on the Waterbeach Greenway. The contribution is to be paid prior to completion of the deed.

23/04686/FUL for the erection of 84 dwellings at 12-34 Fanshawe Road secured a "Transport Contribution" of 152,000 towards the Chisholm Trail. The contribution is to be paid prior to occupation of 50% of the dwellings.

23/04687/FUL for the redevelopment of the local centre including 120 dwellings at Barnwell Local Centre Barnwell Road Cambridge secured a "Cambridge Eastern Access Contribution" of £278,000 towards the Cambridge Eastern Access project. The contribution is to be paid in full prior to first occupation.

24/00889/FUL for the extension to Clarendon House on Clarendon Road Cambridge secured a "Hills Road Corridor Improvement Scheme Contribution" of £119,490 towards the Greater Cambridge Partnership Hills Road Corridor Improvement Scheme. The contribution is to be paid in full prior to commencement of development.

24/01354/FUL for the erection of 70 dwellings at 137 and 143 Histon Road Cambridge secured a "Transport Contribution" of £114,000 towards improvements in the walking and cycling provision on Histon Road. Half of the contribution is paid prior to occupation of any dwellings with the balance prior to the occupation of half of the dwellings.

24/01473/FUL for the erection of a research and development / office building at Dales Manor Business Park Sawston secured a "Transport Contribution" of £156,000 towards the Cambridge South-East Transport (CSET) Route, the Linton Greenway and/or the Sawston Greenway. The contribution is to be paid prior to occupation of the development.

S/3440/18/OL for a new mixed-use village comprising residential development of approximately 3500 dwellings and mixed uses comprising employment retail hotel leisure residential institutions at Bourn Airfield secured a "Cambourne to Cambridge Busway Contribution" of £20,000,000 towards the delivery of the Cambourne to Cambridge Busway. The contribution is paid in five equal instalments (20%) prior to the occupation of 501 dwellings, 1000 dwellings, 1500 dwellings, 2000 dwellings, 2500 dwellings.

This analysis demonstrates that strategic transport contributions are generally secured early in the development and typically before occupation. For larger developments the contributions are staggered to reflect cashflow.

The draft instalment policy consulted on by the Councils means that the full CIL payment is made 420 days after commencement. Where the CIL liability is up to £50,000 full payment is due within 120 days of commencement. Where the CIL liability is between £50,000 and up to £250,000 half of the payment is due at 120 days with the balance at 240 days. Where the CIL liability is between £250,000 and up to £500,000 a quarter of the payment is due at 120 days, half at 240 days and a quarter at 360 days. Where the CIL liability exceeds £500,000 a quarter of the payment is due at 120 days, a quarter at 240 days, a quarter at 360 days, and a quarter at 420 days.

Analysis undertaken ahead of the consultation demonstrated that each charging authority has adopted different instalment terms. Broadly speaking most Councils have between three and five thresholds with the total CIL liability dictating how much falls due and when.

Huntingdonshire District Council has five payment thresholds where the final threshold is for payments of £500,000 or more and requires the final payment (25%) to be made within 720 days of commencement.

East Cambridgeshire District Council has five payment thresholds where the final threshold is for payments of £1,000,000 or more and requires the final payment (30%) to be made within 540 days of commencement.

Peterborough City Council has three payment thresholds where the final threshold is for payments of £500,001 or more and requires final payment (25%) to be made within 720 days of commencement.

Bedford Borough Council has four payment thresholds where the final threshold is for payments of £500,000 or more and requires final payment (25%) to be made within 540 days of commencement.

Oxford City Council has three payment thresholds where the final threshold is for payments of £500,000 or more and requires final payment (25%) to be made within 1095 days of commencement.

Many CIL charging authorities use CIL as a primary funding source and so with a greater CIL liability, greater consideration needs to be taken in relation to instalment payments. For residential developments in Greater Cambridge the CIL payment is largely equivalent to the value of existing s106 payments and which are currently due early in the development. A development of 100 dwellings would generate a CIL liability of around £300,000. The instalment policy would require £75,000 within 120 days of commencement, £150,000 within 240 days of commencement and £75,000 within 360 days of commencement. For residential developments the instalment policy is fair.

For commercial developments the CIL payment will in many cases be greater than the value of existing s106 payments. The draft instalment policy would likely require CIL to be paid prior to occupation.

The Councils propose extending the final payment (at the present higher threshold) from 420 days to 480 days and add a fifth instalment threshold for CIL liability exceeding £1,000,000 where 20% of the CIL liability is due at the following days from commencement: 120, 240, 360, 480, 600.

Question 9. Do you agree that the Council has met all regulatory requirements?

The Councils received 55 responses of which 51% expressed the view that the Council has met all regulatory requirements with 49% opposed. Opponents considered that the regulatory requirements had not been met because of concerns regarding the viability assessment, the adequacy of the infrastructure list, whether developer engagement has been proportionate and representative, the lack of reference to CIL Reg 43 Mandatory Charitable exemption and CIL Reg 44 discretionary charitable exemptions.

Comments in favour of the Council having met all regulatory requirements include

Croudace Homes (Developer Housebuilder) "Yes, the Council has met its regulatory requirements through consultation".

Little Wilbraham and Six Mile Bottom Parish Council: "We agree that the council has met all its regulatory requirements".

Marilyn Ballisat (a resident): "Yes regulatory requirements are met".

Comments against the Council having met all regulatory requirements include

Hill Residential (Developer Housebuilder): "The respondent questions whether the regulatory requirements have been met. The Councils have not used appropriate available evidence to inform the preparation of their Draft Charging Schedules. This is because the proposed Greater Cambridge CIL would be based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. With reference to regulation 14(1)(a) of the CIL regulations, it is not considered that the Councils have effectively considered the actual and expected costs of infrastructure, nor have they appropriately taken into account other actual and expected sources of funding. The Councils have failed to consider the real-world development landscape within Cambridge by not assessing the effects of the GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. In particular the emerging GCLP does not consider large-scale residential schemes within are not considered as a sui generis source of infrastructure funding within the evidence base. With reference to regulation 14(1)(b), it is not considered that the Councils have taken a robust approach to establishing the effects of the Draft Charging Schedules on development viability. A lack of comprehensive testing, failure to account for the stark differences in sales values across Greater Cambridge, and inadequate input assumptions to the VR, mean that the approach to viability testing is not robust".

Redrow Homes (Developer Housebuilder): "As above, until such time as the viability information which underpins the draft CIL charging schedule is resolved, Redrow reserves the right to consider that not all regulatory requirements have been met".

Trinity College (Developer Commercial): "The evidence base does not meet Regulation 14 requirements for R&D typologies, particularly regarding construction costs and economic viability. The Viability Report fails to model construction costs for specialist R&D and laboratory buildings as a separate development typology. The Viability Report does not apply appropriate net-to-gross ratios for laboratory buildings. The report does not account for the full costs of compliance with Local Plan sustainability policies for energy-intensive R&D uses. The evidence base does not prove that proposed commercial rates will not jeopardise the viability of specialist R&D development in Greater Cambridge. A supplementary R&D-specific viability appraisal should be conducted, published, and consulted on before the Draft Charging Schedule is submitted for examination".

Council response to Question 9.

The CIL Regulations and guidance explain how a draft charging schedule is prepared and consulted upon including how it is advertised and how parties are notified. In meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area.

Many of the comments and objections reinforce representations made to other questions in particular the Councils viability assessment and the funding gap. These issues have been addressed by the Councils earlier in the report.

Whether developer engagement has been proportionate and representative

Officers gave an online presentation to Cambridge Ahead on 27 February and an in-person presentation to the Cambridge Development Forum on 6 March to explain the rationale for introducing a CIL across Greater Cambridge, the future relationship with Section 106 planning obligations, and how representations to the consultation could be made. The Councils viability consultants (Quintic Advisory previously BNP Paribas) gave an online presentation to developers and agents on 11 March.

Cambridge Ahead describes itself as a deeply committed, long-term voice for the Cambridge economy, dedicated to good growth that improves quality of life. On behalf of its (circa) 50 members they produce data-driven insight, collaborate with policymakers, and champion the contribution Cambridge city region makes nationally and locally.

Cambridge Development Forum describes itself as a collaborative platform Chaired by The Rt Hon. Lord Lansley CBE dedicated to supporting sustainable growth and development across four key regions: Cambridgeshire, Thames Valley, Greater Cheshire, and Norfolk & Suffolk. The UKDF acts as a strategic voice, championing practical solutions to planning challenges and advancing the efficient delivery of high-quality, sustainable housing and commercial development. It has over 30 Members.

48 representations have been received by developers or land owners demonstrating how well the consultation was publicised. The Council considers that developer engagement has been proportionate.

Lack of reference to Regulations

Some respondents considered there to be a lack of reference to Regulations including Reg 43 Mandatory Charitable exemption, Reg 44 discretionary charitable exemptions, and Reg 59A the Duty to pass CIL to local councils.

The application of mandatory relief is set out in the regulations and the lack of reference to it (or an explanation of whether specific landowners are eligible to claim it) does not mean that the Council has not met its regulatory requirements in relation to the consultation on the draft charging schedule.

There is no requirement to publish a policy relating to discretionary relief ahead of the adoption of CIL. There is no requirement for the Council to publish an exceptional circumstances relief policy ahead of the adoption of CIL.

The regulations required the charging authority to pass 15% of the relevant CIL receipts to the Parish Council for that area. This increases to 25% where that area has a neighbourhood development plan in place. The Councils will work closely with Parish Councils following examination to ensure the impact of CIL is well understood.

Question 10. Do you have any comments on how you feel the neighbourhood portion should be distributed?

The Councils received 55 representations. General comments on this question include:

Cambridge Ahead: "Cambridge Ahead supports the principle that communities where development takes place should benefit directly from investment through the neighbourhood portion of CIL. Where significant sums are generated, it will be important that there is clear governance, transparency and accountability around how funding decisions are made and how money is spent. Regular reporting on allocation and expenditure would help maintain confidence that funds are being used effectively and in a timely way. Cambridge Ahead would welcome further consideration of how this would operate in practice. There may also be opportunities for neighbouring areas to work together where appropriate to deliver projects that benefit a wider community".

Cambridge Biomedical Campus (Developer Commercial): "We support the idea that a proportion of the CIL is spent locally on improvements related to the strategic transport schemes it is supporting. We encourage early engagement with the active communities in the area around the Campus. We are happy to provide the contact details of those groups with whom we work closely".

Edward Leigh (a resident): "Ensure that properly-constituted community, youth, public health, environmental, wildlife and other local organisations are eligible to apply for a share of the neighbourhood portion. To ensure transparency, funding bids should be considered at public forums - parish councils where they exist and community/area forums of elected councillors elsewhere. This would provide a strong purpose and justification for reviving area committees/forums covering the whole of Cambridge, not just areas of new development, as currently".

Hannah Brown (a resident): "Third, I disagree that the proportion for funding for sites neighbouring development areas should be as low as 15%; it should be higher. The neighbouring areas to development often experience greater demand on resources- road infrastructure, schooling, plays pace and GP access therefore a greater proportion should be seen to be locally available to those most impacted".

Maria Carvalho (a resident): "It should be used to fund neighbourhood teams and projects. Remove barriers. Asset based community development. A pot of funding to encourage a new way of working to best support residents needs".

Maria Cleminson (a resident): "We agree that CIL is preferable to S106 and believe that local councillors should decide about the 15%. It is vital that it is in the hands of our democratically elected representatives to whom we can appeal directly".

Mr Mike Evans (a resident): "The question is inappropriate for consultation. If we do not know how the details will be decided then we do not know how to respond. My suggestion is that local ward councillors should be able to decide how the 15% is spent after consulting with their residents. The money should be spent in the ward the development happens in".

Ms Shelley Gregory-Jones (a resident): "Small, local wildlife charities like Cambridge Hedgehogs are in need of support to enable them to provide education services to residents and hospital services for injured and sick hedgehogs. Across the UK hedgehogs are an endangered species, but Cambridge has a significant urban population and, as a community, we have a responsibility to protect and care for it".

Other comments

The Councils received 52 other comments the majority of which were made by the same agent and so the same comments have been repeated. These focus on relief.

Comment: That Discretionary Charitable Relief should be offered by the Councils

Council response: Several respondents have commented that, as registered charities, they would expect Mandatory Charitable Relief to apply where development is used wholly or mainly for its charitable purposes, including the provision of student accommodation for its own students. However, they say, the position is less clear for accommodation developed by the respondent but occupied by students from other Colleges, or where the development forms part of the Colleges wider investment activities. Given the collegiate structure of Cambridge and the way in which Colleges routinely share facilities and accommodation, it is essential that the Councils set out how they intend to interpret the statutory tests.

A charging authority may give discretionary investment relief where:

- the charging authority has given notice that discretionary charitable investment relief is available in the area; and
- the whole or 'greater part' of the chargeable development will be held by the claimant, or by the claimant and other charitable institutions, as an investment from which the profits will be applied for charitable purposes; and
- that portion of the chargeable development to be held as an investment will not be occupied by the claimant for ineligible trading activities; and
- the charging authority must act in compliance with the requirements and duties set out in Subsidy Control Act 2022 when any exemption or relief is granted.

On 7 April 2025 South Cambridgeshire District Council granted planning permission (ref 24/01079/FUL) for the Erection of a Research and Development / Office building at 440 Cambridge Science Park. The applicant was the Master Fellows and Scholars of the College of the Holy and Undivided Trinity within the Town and University of Cambridge of King Henry the Eights Foundation. The s106 agreement secured £860,255.50 to be applied by the County Council towards strategic infrastructure improvement works on the (i) Milton Road corridor and (ii) the Chisholm Trail. On face value this application may be capable of benefitting from a Discretionary Charitable Relief. To apply a Discretionary Charitable Relief where this level contribution (in the least) is demonstrably affordable would be perverse and contrary to the objective of the Councils securing more money for strategic transport contributions across the area. For the avoidance of doubt the Councils can confirm that they are not proposing the introduction of Discretionary Charitable Relief

Comment: That Exceptional Circumstances Relief should be offered by the Councils

Council response: Several respondents have commented that the Councils should introduce exceptional circumstances relief.

Exceptional circumstances relief can be considered where a s106 agreement is in place in relation to the planning permission for the development. A charging authority can give relief from the levy if it deems that the levy would have an unacceptable impact on the viability of a development. There is no statutory definition of what constitutes the viability of a development. The charging authority has the discretion to make judgements about the viability of the scheme in economic terms, however, it is important to ensure that any relief is based on an objective assessment of viability as set out in viability guidance.

The Councils are not at this time considering allowing Exceptional Circumstances Relief and will keep this under review.

Comment: That a policy relating to payments in kind should be published

Council response: A respondent commented specifically on the delivery of strategic site infrastructure. They noted that the draft charging rates have been kept low to enable flexibility in the use of CIL and S106 to achieve an optimal approach to infrastructure delivery and support this approach. They expressed the view that CIL should continue to apply to strategic sites but that specific CIL policy tools should be used to ensure infrastructure delivery related to them is as effective as possible. They suggested that a policy allowing CIL infrastructure payments in kind be published to allow direct delivery of relevant infrastructure by the developer in accordance with Regulation 73 and 73A. Allowing CIL payment in kind for land for infrastructure and for direct delivery of infrastructure on strategic sites will, they said, encourage early infrastructure delivery within schemes, taking into account the relevant cost to developer in doing so. In particular, the use of land and infrastructure payments in kind would be more effective than removing CIL liability.

The ability to pay CIL in kind can be useful in circumstances where the charging authority and the person liable for the levy wish land and/or infrastructure to be provided, instead of money, to satisfy a charge arising from the levy. Subject to relevant conditions, and at its discretion, an authority may enter into an agreement for a land payment to discharge part or all of a levy liability (regulation 73). Charging authorities may also enter into agreements to receive infrastructure as payment (regulation 73A).

For this to be an option the charging authority must publish a policy document which sets out conditions in detail (regulation 73B). This document should confirm that the authority will accept infrastructure payments and set out the infrastructure projects, or types of infrastructure, they will consider accepting as payment.

Where the levy is to be paid as land or infrastructure, a land or infrastructure agreement must be entered into before development commences. This must include the information specified in regulation 73A.

To determine how much liability the 'in-kind' payment will off-set the land or infrastructure must be valued by an independent valuer who will establish its value or cost.

Because the CIL proposed for Greater Cambridge is to cover strategic transport infrastructure there are fewer instances for payment in kind to be applied.

For example, other charging authorities may agree for the delivery of a new primary school to be facilitated through an in kind policy in lieu of CIL which would ordinarily have been used. The charging authority may introduce a broad in kind policy relating to (for example) primary schools, community centres, sports pavilions. In Greater Cambridge such facilities would be delivered through a planning obligation meaning a narrow in kind policy is required.

The Councils agree that adopting an in kind policy enables different ways of strategic transport infrastructure to be delivered (especially in relation to sites proposed through the Greater Cambridge Local Plan) and will consider the introduction of a policy relating specifically and exclusively to land or infrastructure relating to strategic transport.

Appendix A Section 106 contributions for GCP projects

App No	Deed Date	Site Address	Ward	District	Type	Clause	GCP Summary Detail	In Kind Value
14/0887/FUL	3/10/14	Garages 11 - 45 Ekin Road Cambridge Cambridgeshire	Abbey	CCC	Transport Contribution - ECATP - County (in kind)	S6,2	GCP: Eastern Access	£5,839.50
14/0887/FUL	3/10/14	Garages 11 - 45 Ekin Road Cambridge Cambridgeshire	Abbey	CCC	Transport Contribution - ECATP - County (in kind)	S6,3	GCP: Eastern Access	£5,839.50
14/1691/S73	2/4/15	Land South Of Robinson Way West Of The Forvie Site Robinson Way Cambridge Cambridgeshire	Queen Ediths	CCC	Highways - Contribution	S1	GCP: CSET Phase 1 and Linton Greenway	£80,682.93
15/0893/FUL	30/11/15	Land West Of ARM 1 Peterhouse Technology Park Fulbourn Road Cambridge Cambridgeshire CB1 9PT	Cherry Hinton	CCC	Highways - Contribution	S5,6.2	GCP: Cross City Cycling - Fulbourn	£400,000.00
S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,1	GCP: Milton Road	£7,500.00

S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2	GCP: Milton Road	£7,500.00
S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,3	GCP: Milton Road	£90,000.00
S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,4	GCP: Milton Road	£90,000.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,1	GCP: Milton Road	£10,665.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2	GCP: Milton Road	£10,665.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,3	GCP: Milton Road	£127,980.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,4	GCP: Milton Road	£127,980.00
S/1109/15/FL	18/12/15	Phase 2 Land (Zone 1) Granta Park Great Abington Cambridgeshire CB21 6AL	The Abingtons	SCDC	Transport - Contribution to County (in kind)	S2,1.1 a	GCP: Sawston Greenway	£50,000.00

S/1109/15/FL	18/12/15	Phase 2 Land (Zone 1) Granta Park Great Abington Cambridgeshire CB21 6AL	The Abingtons	SCDC	Transport - Contribution to County (in kind)	S2,1.1 b	GCP: CSET Phase 1 and Linton Greenway	£100,000.00
S/1109/15/FL	18/12/15	Phase 2 Land (Zone 1) Granta Park Great Abington Cambridgeshire CB21 6AL	The Abingtons	SCDC	Transport - Contribution to County (in kind)	S2,1.1 d	GCP: CSET Phase 1 and Linton Greenway	£20,000.00
15/0906/FUL	12/2/16	32 - 38 Station Road And Adjacent Land Cambridge Cambridgeshire CB1 2JH	Trumpington	CCC	Footpaths and Cycle Ways - Contribution	S6,P2,5	GCP: Chisholm Trail Phases 1 & 2	£500,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,1.1	GCP: Milton Road	£100,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,1.2	GCP: Milton Road	£100,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,2.1	GCP: Milton Road	£125,000.00

S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,2.2	GCP: Milton Road	£125,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,3.1	GCP: Milton Road	£152,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,3.2	GCP: Milton Road	£152,000.00
15/2112/FUL	1/7/16	Land Adjacent Frankie And Bennys Restaurant Cambridge Retail Park Newmarket Road Cambridge Cambridgeshire	Abbey	CCC	Footpaths and Cycle Ways - Contribution	S4,1	GCP: Chisholm Trail Phases 1 & 2	£30,000.00
15/1522/FUL	26/10/16	Daedalus House Station Road Cambridge Cambridgeshire CB1 2RE	Trumpington	CCC	Transport - Contribution to County (in kind)	S6,P2,5	GCP: Chisholm Trail Phases 1 & 2	£370,159.00
S/1405/16/FL	3/11/16	29 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0DW	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,1	GCP: Milton Road	£82,653.00

S/1405/16/FL	3/11/16	29 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0DW	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,2	GCP: Milton Road	£82,653.00
S/0343/16/FL	3/11/16	St Johns Innovation Park Cowley Road Cambridge Cambridgeshire	East Chesterton	CCC	Transport - Contribution to County (in kind)	S4,2	GCP: Cross City Cycling - Green End Road	£187,849.00
S/0343/16/FL	3/11/16	St Johns Innovation Park Cowley Road Cambridge Cambridgeshire	East Chesterton	CCC	Transport - Contribution to County (in kind)	S4,3	GCP: Milton Road	£112,709.00
S/2682/13/OL	30/11/16	Land North Of Newmarket Road Cambridge CB5 8AA	Fen Ditton & Fulbourn	SCDC	Footpaths and Cycle Ways - Contribution	S12,2.1.1	GCP: Chisholm Trail Phases 1 & 2	£70,000.00
S/2682/13/OL	30/11/16	Land North Of Newmarket Road Cambridge CB5 8AA	Fen Ditton & Fulbourn	SCDC	Footpaths and Cycle Ways - Contribution	S12,2.1.2	GCP: Chisholm Trail Phases 1 & 2	£475,000.00
S/2682/13/OL	30/11/16	Land North Of Newmarket Road Cambridge CB5 8AA	Fen Ditton & Fulbourn	SCDC	Highways - Contribution	S12,3.1	GCP: Eastern Access	£2,270,000.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,1	GCP: Cross City Cycling - Green End Road	£49,219.00

S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2	GCP: Cross City Cycling - Green End Road	£49,219.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,3	GCP: Milton Road	£25,000.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,4	GCP: Milton Road	£25,000.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,5	GCP: Milton Road	£124,138.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,6	GCP: Milton Road	£124,138.00
S/1963/15/OL	17/8/17	Land To North And South Of And Immediate Linton Cambridgeshire	Linton	SCDC	Bus Services - Contribution	S3,P5,1	GCP: CSET Phase 1 and Linton Greenway	£35,000.00

S/2433/16/FL	13/9/17	Unit 216 Cambridge Science Park Cambridge	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2.1	GCP: Milton Road	£5,670.00
S/2433/16/FL	13/9/17	Unit 216 Cambridge Science Park Cambridge	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2.2	GCP: Milton Road	£68,040.00
16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.4.1	GCP: Cambridge South West Travel Hub	£54,500.00
16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.4.2	GCP: Cambridge South West Travel Hub	£146,400.00
16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.5.1	GCP: Cambridge South West Travel Hub	£146,400.00

16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.5.3	GCP: Cambridge South West Travel Hub	£54,500.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1a	GCP: Cambourne to Cambridge	£1,066,720.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1a	GCP: Cambourne to Cambridge	£533,280.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1b	GCP: Cambourne to Cambridge	£1,066,720.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1b	GCP: Cambourne to Cambridge	£533,280.00

S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .2	GCP: Cambourne to Cambridge	£5,500,000.00
S/2553/16/OL	1/2/18	Land Off Horseheath Road Linton Cambridge CB21 4AY	Linton	SCDC	Highways - Contribution	S3,P2,1	GCP: CSET Phase 1 and Linton Greenway	£20,000.00
S/2553/16/OL	1/2/18	Land Off Horseheath Road Linton Cambridge CB21 4AY	Linton	SCDC	Bus Services - Contribution	S3,P3,1	GCP: CSET Phase 1 and Linton Greenway	£10,000.00
17/2245/FUL	6/6/18	Mill Road Depot Mill Road Cambridge CB1 2AZ	Petersfield	CCC	Highways - Contribution	S9,1.2	GCP: Chisholm Trail Phases 1 & 2	£124,257.00
S/2372/17/FL	23/7/18	Land Adjacent To Cambridge North Station Milton Avenue Cambridge CB4 0WZ	Milton (Detached)	SCDC	Signage / Wayfinding - Contribution	S2,1.2b	GCP: Chisholm Trail Phases 1 & 2	£14,151.00
S/4478/17/FL	24/7/18	Land Adjacent To Cambridge North Station Land Adjacent To Cambridge North Station Cowley Road Cambridge	Milton (Detached)	SCDC	Signage / Wayfinding - Contribution	S2,1.2(b)	GCP: Chisholm Trail Phases 1 & 2	£15,849.00

S/4478/17/FL	24/7/18	Land Adjacent To Cambridge North Station Land Adjacent To Cambridge North Station Cowley Road Cambridge	Milton (Detached)	SCDC	Footpaths and Cycle Ways - Contribution	S2,1.2(c)	GCP: Chisholm Trail Phases 1 & 2	£59,698.00
S/2372/17/FL	24/7/18	Land Adjacent To Cambridge North Station Milton Avenue Cambridge CB4 0WZ	Milton (Detached)	SCDC	Footpaths and Cycle Ways - Provision	S2,4misc	GCP: Waterbeach Greenway	£40,236.85
17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,1	GCP: Comberton Greenway	£400,000.00
17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Bridges - Contribution	S2,2	GCP: Comberton Greenway	£30,000.00
17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Highways - Contribution	S2,3	GCP: Madingley Road	£45,000.00

17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Highways - Contribution	S2,4	GCP: Madingley Road	£60,000.00
17/1896/FUL	28/12/18	Land To The West Of JJ Thomson Avenue And To The North Of University Residences West Cambridge Site Madingley Road Cambridge	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,1.2	GCP: Madingley Road	£45,000.00
17/1896/FUL	28/12/18	Land To The West Of JJ Thomson Avenue And To The North Of University Residences West Cambridge Site Madingley Road Cambridge	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,1.3	GCP: Madingley Road	£2,000.00
S/2941/18/FL	6/3/19	Land North Of Melbourn Science Park Melbourn Cambridgeshire	Melbourn	SCDC	Footpaths and Cycle Ways - Contribution	S1,2.1-2.2	GCP: Melbourn Greenway	£56,500.00
S/2941/18/FL	6/3/19	Land North Of Melbourn Science Park Melbourn Cambridgeshire	Melbourn	SCDC	Footpaths and Cycle Ways - Contribution	S1,3.1-3.2	GCP: Melbourn Greenway	£25,000.00

19/0175/FUL	13/8/19	Mill Road Depot Mill Road Cambridge Cambridgeshire CB1 2AZ	Petersfield	CCC	Highways - Contribution	S8,1.2.1	GCP: Chisholm Trail Phases 1 & 2	£35,591.00
19/0175/FUL	13/8/19	Mill Road Depot Mill Road Cambridge Cambridgeshire CB1 2AZ	Petersfield	CCC	Highways - Contribution	S8,1.2.2	GCP: Chisholm Trail Phases 1 & 2	£35,591.00
19/0288/FUL	11/10/19	Development Land At 75 Cromwell Road Cambridge Cambridgeshire	Romsey	CCC	Highways - Contribution	S9,2-3	GCP: Chisholm Trail Phases 1 & 2	£71,182.00
18/0481/OUT	14/12/20	Land North Of Cherry Hinton Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Highways - Contribution	S9,4.1	GCP: Cycling Plus - A1134	£200,000.00
S/4329/18/OL	17/12/20	Wellcome Genome Campus Hinxton Saffron Walden Cambridgeshire CB10 1RQ	Duxford	SCDC	Highways - Contribution	S3,2.19-2.20	GCP: CSET Phase 2	£140,000.00
S/4329/18/OL	17/12/20	Wellcome Genome Campus Hinxton Saffron Walden Cambridgeshire CB10 1RQ	Duxford	SCDC	Transport - Contribution to County (in kind)	S3,4.6	GCP: Whittlesford Station	£750,000.00

S/4615/18/OL	22/4/21	Land To The West Of Cambridge Research Park Beach Drive Landbeach CB25 9TL	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,3.1-3.2	GCP: Waterbeach to Cambridge	£380,000.00
19/1168/OUT	20/5/21	Land At Newbury Farm Babraham Road Cambridge Cambridgeshire	Queen Ediths	CCC	Transport - Contribution to County (in kind)	S5,P3,1-2	GCP: CSET Phase 1 and Linton Greenway	£345,000.00
20/04826/FUL	10/9/21	Lockton House Clarendon Road Cambridge Cambridgeshire CB2 8FH	Trumpington	CCC	Transport - Contribution to County (in kind)	4.1	GCP: Chisholm Trail Phases 1 & 2	£135,869.00
20/03802/FUL	10/9/21	Development Parcel L2 Topper Street Orchard Park Cambridge Cambridgeshire	Histon & Impington	SCDC	Footpaths and Cycle Ways - Contribution	S4,1-2	GCP: Histon Road	£75,000.00
20/01972/OUT	7/1/22	Netherhall Farm Worts Causeway Cambridge CB1 8RJ	Queen Ediths	CCC	Transport - Contribution to County (in kind)	S2,5.1	GCP: CSET Phase 1 and Linton Greenway	£300,000.00
20/03429/FUL	9/2/22	104 - 112 Hills Road Cambridge Cambridgeshire	Trumpington	CCC	Highways - Contribution	S4,1(a)	GCP: Cycling Plus - Hills Road	£50,000.00
20/03429/FUL	9/2/22	104 - 112 Hills Road Cambridge Cambridgeshire	Trumpington	CCC	Highways - Contribution	S4,1(b)	GCP: Cycling Plus - Hills Road	£450,000.00

20/02142/OUT	25/3/22	Northstowe Phase 3B Station Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P1,1.1 b	GCP: St Ives Greenway	£356,000.00
20/02171/OUT	25/3/22	Northstowe Phase 3A Rampton Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P1,1.1 b(i)	GCP: St Ives Greenway	£712,000.00
20/02171/OUT	25/3/22	Northstowe Phase 3A Rampton Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P1,1.1 b(ii)	GCP: St Ives Greenway	£712,000.00
21/00264/FUL	25/3/22	Blocks B2 & F2, Devonshire Quarter Devonshire Road Cambridge Cambridgeshire	Petersfield	CCC	Footpaths and Cycle Ways - Contribution	S4,P2,1	GCP: Chisholm Trail Phases 1 & 2	£30,000.00
20/03523/FUL	23/6/22	Land In The North West Part Of The St Johns Innovation Park Cowley Road Milton Cambridge Cambridgeshire CB4 0ZT	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S4,1	GCP: Waterbeach Greenway	£225,999.24

20/03523/FUL	23/6/22	Land In The North West Part Of The St Johns Innovation Park Cowley Road Milton Cambridge Cambridgeshire CB4 0ZT	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S4,2	GCP: Waterbeach Greenway	£150,666.16
20/03598/OUT	7/7/22	Land West Of Station Road Longstanton Cambridge CB24 3DS	Longstanton	SCDC	Highways - Contribution	S3,P4,1b & 2b	GCP: St Ives Greenway	£57,000.00
20/03598/OUT	7/7/22	Land West Of Station Road Longstanton Cambridge CB24 3DS	Longstanton	SCDC	Highways - Contribution	S3,P4,3b & 4b	GCP: St Ives Greenway	£57,000.00
20/05040/FUL	11/8/22	Land To The West Of Peterhouse Technology Park Fulbourn Road Cambridge CB1 9NJ	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	3.1.5-3.1.6c	GCP: Fulbourn Greenway	£361,735.00
21/03822/FUL	2/9/22	Site 1 Granta Park Great Abington Cambridge Cambridgeshire CB21 6GP	Linton	SCDC	Transport - Contribution to County (in kind)	S1,2	GCP: CSET Phase 1 and Linton Greenway	£390,613.00

22/02330/FUL	18/10/22	Long Road Sixth Form College Long Road Cambridge CB2 8PX	Queen Ediths	CCC	Highways - Contribution	S4,1.1	GCP: Sawston Greenway	£16,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,P2,1b	GCP: Comberton Greenway	£370,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Highways - Contribution	S2,P2,1c	GCP: Comberton Greenway	£60,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,P2,1d	GCP: Cambourne to Cambridge	£250,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,P2,1g	GCP: Comberton Greenway	£120,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (i)	GCP: Cambourne to Cambridge	£1,858,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (ii)	GCP: Cambourne to Cambridge	£1,858,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (iii)	GCP: Cambourne to Cambridge	£1,858,000.00

16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (iv)	GCP: Cambourne to Cambridge	£1,858,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (v)	GCP: Cambourne to Cambridge	£1,858,000.00
S/4243/19/FL	16/3/23	Land To The West Of Neal Drive Orchard Park Cambs	Histon & Impington	SCDC	Footpaths and Cycle Ways - Contribution	S4,1 & 2	GCP: Histon Road	£35,000.00
22/03826/FUL	19/4/23	Burlington Park Station Road Foxton Cambridgeshire	Foxton	SCDC	Transport - Contribution to County (in kind)	S3,P2,2.1	GCP: Melbourn Greenway	£70,000.00
22/03363/FUL	20/4/23	Dales Manor Business Park Grove Road Sawston Cambridgeshire CB22 3TJ	Sawston	SCDC	Transport - Contribution to County (in kind)	S2,1,1.2	GCP: CSET Phase 1 and Linton Greenway	£323,505.00
20/05253/FUL	15/5/23	Cambridge Innovation Park Denny End Road Waterbeach Cambridge Cambridgeshire CB25 9PB	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S3,PII,1.3	GCP: Waterbeach Greenway	£79,000.00

20/05253/FUL	15/5/23	Cambridge Innovation Park Denny End Road Waterbeach Cambridge Cambridgeshire CB25 9PB	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S3,PII,1.4	GCP: Waterbeach Greenway	£54,000.00
22/01982/FUL	19/5/23	Devonshire Gardens Devonshire Road Cambridge Cambridgeshire CB1 2BJ	Petersfield	CCC	Footpaths and Cycle Ways - Contribution	S7,1	GCP: Chisholm Trail Phases 1 & 2	£95,164.44
S/3854/19/OL	22/6/23	Digital Park Station Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P3,1.1 b & 1.2b	GCP: St Ives Greenway	£43,000.00
S/3854/19/OL	22/6/23	Digital Park Station Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P3,1.3 b & 1.4b	GCP: St Ives Greenway	£43,000.00
23/02467/FUL	18/1/24	Land At The Way Fowlmere Cambridgeshire	Foxton	SCDC	Transport - Contribution to County (in kind)	S3,2,1 & 2 x	GCP: Melbourn Greenway	£10,000.00
23/01457/FUL	19/1/24	10A Cheddars Lane Cambridge Cambridgeshire CB5 8LD	Abbey	CCC	Highways - Contribution	S4,2-3	GCP: Eastern Access	£102,400.00

23/01487/FUL	5/2/24	Vitrum Building St Johns Innovation Park Cowley Road Cambridge Cambridgeshire CB4 0WS	East Chesterton	CCC	Transport - Contribution to County (in kind)	S3,1 & 2a	GCP: Waterbeach Greenway	£722,685.00
23/01474/FUL	1/3/24	Blocks B2 & F2, Devonshire Quarter Devonshire Road Cambridge Cambridgeshire	Petersfield	CCC	Highways - Contribution	S4,P2,1	GCP: Chisholm Trail Phases 1 & 2	£30,000.00
23/01150/FUL	26/4/24	Land North Of 39A Station Road (west) Whittlesford Cambridgeshire CB22 4NL	Whittlesford	SCDC	Transport - Contribution to County (in kind)	S3,4,1 & 2	GCP: Whittlesford Station	£42,240.00
23/03654/FUL	2/7/24	Cambridge South West Way Sawston Cambridgeshire CB22 3FG	Sawston	SCDC	Highways - Contribution	S3,2.1 & 2	GCP: Sawston Greenway	£152,686.00
23/00835/FUL	5/7/24	Taylor Vinters Merlin Place 460 Milton Road Cambridge Cambridgeshire CB4 0DP	East Chesterton	CCC	Transport - Contribution to County (in kind)	S3,2,a,i	GCP: Waterbeach Greenway	£460,833.00

23/03080/OUT	23/7/24	Former Waste Water Treatment Facility Cambridge Road Hauxton Cambridgeshire CB22 5HT	Harston & Comberton	SCDC	Transport - Contribution to County (in kind)	S3,1&2	GCP: Melbourn Greenway	£682,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1a	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1b	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1c	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1d	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1e	GCP: Cambourne to Cambridge	£4,000,000.00
23/04686/FUL	12/11/24	12 - 34 Fanshawe Road Cambridge Cambridgeshire CB1 3QY	Coleridge	CCC	Transport - Contribution to County (in kind)	S10,2	GCP: Chisholm Trail Phases 1 & 2	£152,000.00

23/04687/FUL	26/11/24	Barnwell Local Centre Barnwell Road Cambridge Cambridgeshire CB5 8RG	Abbey	CCC	Transport - Contribution to County (in kind)	S11,2	GCP: Cambridge Eastern Access	£278,000.00
23/04431/FUL	23/12/24	121-123 Chesterton Road Cambridge Cambridgeshire	West Chesterton	CCC	Transport - Contribution to County (in kind)	S4,1.1	GCP: Milton Road	£29,500.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.1	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.2	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.3	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.4	GCP: Melbourn Greenway	£50,250.00

23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.5	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.6	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.7	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.8	GCP: Melbourn Greenway	£50,250.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.1	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00

23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.2	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.3	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.4	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P4, 6-6.1	GCP: Fulbourn Greenway	£407,544.00
24/01370/FUL	20/2/25	29 Station Road Shepreth Cambridgeshire SG8 6GB	Melbourn	SCDC	Footpaths and Cycle Ways - Contribution	S2,1	GCP: Melbourn Greenway	£25,500.00
24/01354/FUL	6/3/25	137 And 143 Histon Road Cambridge Cambridgeshire CB4 3HZ	Arbury	CCC	Transport - Contribution to County (in kind)	S11,2	GCP: Histon Road	£57,000.00

24/01354/FUL	6/3/25	137 And 143 Histon Road Cambridge Cambridgeshire CB4 3HZ	Arbury	CCC	Transport - Contribution to County (in kind)	S11,4	GCP: Histon Road	£57,000.00
24/00889/FUL	11/3/25	Clarendon House Clarendon Road Cambridge Cambridgeshire CB2 8FH	Petersfield	CCC	Transport - Contribution to County (in kind)	S4,2	GCP: Cycling Plus - Hills Road	£119,490.00
24/01079/FUL	1/4/25	440 Cambridge Science Park Milton Cambridge South Cambridgeshire CB4 0QA	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Provision	S3,3	GCP: Milton Road / Cambridge & Chisholm Trail Phases 1 & 2	£860,255.50
17/1799/FUL	23/6/25	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Highways - Contribution	S2,1 dov	GCP: Comberton Greenway	£12,087.00
24/01473/FUL	3/7/25	Phase 2, South Cambridge Science Centre Dales Manor Business Park Grove Road Sawston Cambridgeshire CB22 3TJ	Sawston	SCDC	Transport - Contribution to County (in kind)	S2,8	GCP: CSET / Linton Greenway and/or Sawston Greenway	£156,000 (up to)