Outlook

Response to CIL consultation

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Date Sun 3/29/2026 23:58
To cil <cil@GreaterCambridgePlanning.org>
Cc Cllr Katie Thornburrow (Cambridge City - Petersfield) <Katie.Thornburrow@cambridge.gov.uk>; Tumi Hawkins Cllr <tumi@tumihawkins.org.uk>

Dear CIL Consultation Team,

Firstly, could Planning Services please in future give the consultation end time as 23:59pm, not 00:00pm to avoid ambiguity about which day it ends? And please end consultations on a Sunday evening or Monday morning, not Saturday night.

Q1. Who are you responding on behalf of?

Resident

Q2. Do you wish to participate in the CIL examination?

No

Q3. Do you agree that the Council should introduce CIL?

Possibly, but the greater need is for an up-to-date and comprehensive transport strategy and plan for the region. This was identified in the council's response to the Developer Contributions SPD consultation:

Through engagement with Cambridgeshire County Council and the Combined Authority, the Councils are working to get to this position through the preparation of the Greater Cambridge Transport Strategy that will set out the transport infrastructure required to support growth across the area over the short to long-term. The Strategy, and its supporting evidence, is required to secure contributions (either S106 or CIL) as suggested. In the absence of the Strategy, contributions towards strategic transport infrastructure will need to be determined on a development-by development basis, having regard to a development's assessed impacts.

Ref: https://scambs.moderngov.co.uk/documents/s142124/App%203.pdf page 118

That would do more to address the funding shortfall than CIL because it would allow the LPAs to secure more funding for transport infrastructure and services.

Q4. Do you agree that the Council has demonstrated a funding gap?

Yes

Q5. Do you agree that the Council has used appropriate evidence to inform the proposed rates?

Emphatically, no. The calculation of transport funding need is based largely on the GCP's budget shortfall. The GCP's programme is based on the Transport Strategy for Cambridge and South Cambridgeshire which was adopted in March 2014 (twelve years ago). That is before the local councils declared climate emergencies. National policies around transport have evolved significantly, in particular since the creation of Active Travel England. Therefore, a transport strategy and plan from 2014 is out of date and, at best, an incomplete basis for determining the transport needs of the region in future years.

The GCP programme is in no sense comprehensive. There are hundreds of small-scale schemes needed around the Greater Cambridge region to create safer active travel connections into Cambridge, to local schools, employment centres, and other destinations. Similarly, there are hundreds of opportunities to improve bus journey speeds and reliability through targeted interventions in the road network.

The GCP programme does not include a wholesale upgrade to the quality of bus services to provide a practical and attractive alternative to driving. Funding these improvements from Section 106 is challenging because the cost is typically a multiple of approx £1m, which funds one bus for five years. There are also wider benefits to improving a bus service which, if deducted from the S106 contribution, leave a shortfall that is difficult to fill. If there isn't another development being built out on a similar time frame that can benefit from enhancement of the same service, the shortfall would have to be met from scarce council revenue funding or investment by a typically risk-averse bus service operator.

There is also a huge gap in the GCP programme – the City Access Project. All planned projects depend on releasing road capacity for buses, walking and cycling in Cambridge city. Proposals to achieve this (with more bus gates or congestion charging) have all been rejected by councillors and no proposal is currently on the tables. Investment is needed, for instance, to redirect traffic flows, redesign bus routes, relocate bus stops and taxi ranks, build more segregated cycling infrastructure, increase the frequency and operating hours of bus services, and install and manage an advanced traffic management system. The City Access Project isn't even mentioned in the Infrastructure Statement and the associated requirements are not costed.

Even if the GCP programme is the best available evidence of required infrastructure, project costs are significantly understated.

There is an error of fact of the Infrastructure Statement on page 28. The cost of *constructing* the CSET busway, according to the Estimate of Costs (January 2025) submitted to the public inquiry is £161m. The budget held by GCP of £23.3m is *additional*. It includes over £20m already spent on this project and future costs of the public inquiry. The total project cost is therefore at least £184m, not £160m as stated.

Other budgeted costs have not been updated to account for construction inflation, and therefore understate the funding requirement. For instance, the budget for the Waterbeach busway has been £109.4m since September 2023.

Correct figures and applying an inflation adjustment factor to current and paused proposals would most likely yield a total delivery cost closer to £1bn in 2026 prices, and therefore a funding gap closer to £400m rather than £272.5m stated. CIL income, estimated at £50m over the plan period, will proportionately make an even smaller dent in the shortfall.

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?

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:
https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning/developer-infrastructure-contributions-guide/technical-appendix-1-transport.pdf

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.

Q7. Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?

No. There needs to be a clear statement of what CIL and S106 will cover. I suggest that, for transport, CIL should pay for mitigating cumulative impacts, and S106 for mitigating direct impacts.

It should also be made explicit in Local Plan policy that a development can mitigate its direct and cumulative transport impacts by investing in measures that mode-shifts trips not connected to the development but which release road capacity to accommodate vehicular trips to/from the development. For example, a development should, where appropriate, be required to pay for a new cycle track or an improved local bus service rather than pay to reconfigure or signalise a junction to increase vehicular capacity. This is part of vision-led transport planning, as the NPPF now requires.

Q8. Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?

No view

Q9. Do you agree that the Council has met all regulatory requirements?

No view

Q10. Do you have any comments on how you feel the neighbourhood portion should be distributed?

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

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