

Project Name Cambridge CIL

Subject Statement on Issue 2 to CIL Hearing, 12th – 13th October 2026

Reference 26241/N01

Date 2 October 2026

1 ISSUE 2 INFRASTRUCTURE REQUIREMENTS AND FUNDING

1.1 Introduction

1.1.1 This document is Hearing Statement 2. It addresses Issue 2 that has been raised by the Inspector into the Hearing for the proposed Cambridge City and South Cambridgeshire Community Infrastructure Levy (CIL). This statement is presented on behalf of the Developer Consortium that is referenced in Hearing Statement 1.

1.1.2 This Statement addresses the questions raised by the Inspector in relation to infrastructure requirements. In particular, it comments on:

- The extent to which the evidence presented by the Greater Cambridge Shared Planning Service supports the introduction of CIL;
- The likely effect and necessity of the strategic transport schemes that are proposed to be funded through CIL;
- The extent to which there is a funding gap in the provision of strategic transport infrastructure; and
- The extent to which the proposed CIL will address any funding gap that exists.

1.1.3 This statement addresses each of these themes by responding the specific questions that have been raised by the Inspector.

1.2 Background

1.2.1 It is submitted that for a CIL charge to be lawful, enforceable and in accordance with the CIL regulations, the charging authority needs to do the following:

- Demonstrate that the infrastructure contained within the charging schedule is necessary to deliver the development contained in its Local Plan;
- Demonstrate the funding sources for that infrastructure and calculate any funding gap to enable its delivery;
- Assess the viability of filling that funding gap through the application of CIL
- Create a charging schedule based on that information

- 1.2.2 These are the fundamental steps to ensure there is a 'Golden Thread' running through the process from the evidence base for the infrastructure proposed to the CIL charge itself. This golden thread is key to ensuring that only infrastructure which is necessary, proportionate and directly related to the developments it aims to support, is included in the charging schedule and that any charge is lawful and in accordance with the regulations.

1.3 Glossary of Governance organisations

- 1.3.1 Within this statement reference is made to a range of organisations that make up the complex governance of the Greater Cambridge area. A glossary of key bodies and terms is as follows:

- Greater Cambridge – administrative area covering Cambridge City and South Cambridgeshire
- Cambridge City Council and South Cambridgeshire District Council – City/District Councils and Local Planning Authorities. They are responsible for the preparation of the proposed CIL
- Greater Cambridge Shared Planning Service – a partnership of Cambridge City Council and South Cambridgeshire District Council to deliver planning services in the Greater Cambridge area and lead on the proposed CIL
- Cambridgeshire County Council (CCC) – Local Highway Authority and until 2017, the Local Transport Authority. Until 2017, responsible for transport strategy to underpin Local Plan delivery and continues to be the body that will deliver most strategic transport infrastructure
- Greater Cambridge City Deal – agreed with Government in 2014 between Cambridge City Council, South Cambridgeshire District Council, Cambridgeshire County Council, the Cambridgeshire Local Enterprise Partnership and the University of Cambridge. It provides up to £1bn of investment over 15 years in the Greater Cambridge area for transport, skills, housing and environment
- Greater Cambridge Partnership (GCP) – the delivery Body for the Greater Cambridge City Deal, operating as a Joint Committee under the Planning and Compulsory Purchase Act, 2004
- Cambridgeshire and Peterborough Combined Authority (CPCA) – a Mayoral Combined Authority covering the administrative areas of Cambridgeshire and Peterborough. Since 2017, it has been the Local Transport Authority for the area and is now responsible for developing the transport strategy to underpin Local Plan development
- The Cambridge Growth Company and Urban Development Corporation (CGC) – a newly created body to assume planning functions from Cambridge City Council and South Cambridgeshire District Council for larger and strategic sites, as well as plan making powers.

2 RESPONSE TO QUESTIONS RAISED BY THE INSPECTOR

2.1 1) Is the evidence on strategic transport infrastructure requirements adequate and sufficiently up to date?

- 2.1.1 To answer this question, it is important to understand the basis on which the current CIL proposal has been developed and to assess if it meets the tests noted above.
- 2.1.2 The current Cambridge City and South Cambridgeshire Local Plans were adopted in 2018 and are due to be replaced by a new Joint Local Plan in 2028.
- 2.1.3 The CIL consultation document notes that the transport infrastructure evidence base for the 2018 Local Plans lies in the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) produced by Cambridgeshire County Council in 2014¹. The TSCSC was prepared as an ambitious and wide-ranging document that included a long list of transport schemes that in 2014, the County Council wished to see delivered to achieve its broad transport objectives. The document groups these schemes into short/medium, medium, medium/long, and long term and it recognises that many are aspirational and may not be delivered over the life of the strategy.
- 2.1.4 The TSCSC states that one of its objectives is to support the Cambridge City and South Cambridgeshire Local Plans by showing infrastructure that is needed to deliver growth and to inform the development of a potential CIL charge for the area. However, this is outdated as an evidence base having been prepared 13 years ago, and in presenting the list of schemes, the TSCSC does not distinguish between 'nice to have' schemes and those directly related to and which are necessary to deliver the developments in the Local Plans. A necessary scheme here, of course means a scheme which is required for development to come forward. i.e. a scheme without which the development it supports would not be acceptable and could not come forward.
- 2.1.5 Whilst there was some modelling underpinning the TSCSC, the overall package of measures was not tested in detail to identify specifically which schemes from the long list were actually necessary to enable the developments to go ahead. Such a process is currently under way for the emerging Greater Cambridge Joint Local Plan. For that plan, the CPCA is leading on a Greater Cambridge Transport Strategy (GCTS) and preparation of an Infrastructure Delivery Plan (IDP) to support the new Local Plan.
- 2.1.6 Consequently, it is not possible to draw a direct link between the wide range of schemes in the TSCSC and those which are in fact, necessary to deliver the growth in the Local Plans.
- 2.1.7 However, although the CIL consultation relies upon the TSCSC as the evidence base for the charge, the actual transport Infrastructure list and funding requirement in the CIL consultation is

¹ Transport Strategy for Cambridge and South Cambridgeshire, Cambridgeshire County Council, March 2014

based on something quite different – a derivative of the TSCSC which is the City Deal transport programme.

2.1.8 The Greater Cambridge City Deal was agreed with Government in June 2014 and provided for up to £500m of public funding on the basis that a further £500m would be raised locally². The local funding was assumed at the time, to come from a variety of sources including s106 receipts, Local Transport Plan funding and New Homes Bonus.

2.1.9 The total £1bn funding pot was negotiated with government by the authorities based on a bespoke transport programme that drew schemes from the TSCSC.

2.1.10 The Greater Cambridge City Deal document says the following about that strategy³:

The backbone of the proposed strategy is a transport network to link areas of population and employment within the City Deal area. There will be new orbital bus routes around Cambridge and new high quality public transport links into Cambridge on key corridors, connecting with major employment centres. There will be a comprehensive network of pedestrian and cycle routes within Cambridge and the main radial routes will have high quality bus priority measures.

This will transform connectivity within and beyond the City Deal area, and will allow significant increases in bus and cycle use, particularly within Cambridge, that will maximise the capacity for movement, particularly within the historic core. This strategy supports carbon objectives and promotes high quality of life for local communities by minimising the environmental impact of transport whilst promoting the ability for the area to grow.

2.1.11 The transport programme chosen to accompany the City Deal submission to government was not expressly designed to deliver the Local Plan developments proposed at the time. Rather, it was a collection of strategic schemes across the area, many of which had been considered over several years and were aimed at achieving the much broader City Deal objectives. In combination, these were intended to increase capacity particularly for active travel modes such as walking and cycling alongside improvement of local environments. At the time it was prepared, the package was not systematically tested against the contents of the emerging Local Plans. As a result, there is not a direct link showing that the schemes included in the City Deal programme are in themselves, necessary to deliver the development contemplated in the Local Plan. As with the TSCSC, this programme was prepared 13 years ago and so as with the TSCSC is not an up to date basis on which to prepare a CIL.

2.1.12 Since initial adoption of the City Deal transport programme, its contents have changed significantly.

2.1.13 This is evidenced by some of the most important transport capacity schemes being removed or changed in more recent iterations of the programme. An example of one of the most important proposals initially included in the City Deal transport programme and the TSCSC is the Western

² Greater Cambridge City Deal, MHCLG, 19th June 2024

³ Greater Cambridge City Deal, MHCLG, 19th June 2024, P3

Orbital. This was planned as a vital scheme to distribute traffic around the western side of Cambridge and between growth points but was removed early in the life of the City Deal for environmental and political reasons. Other schemes have changed significantly, examples being the Milton Road and Histon Road schemes that were intended to consist of the high-quality bus priority measures. However, as delivery progressed, these turned out to be largely active travel and environmental schemes. Good in themselves, but not adding significant strategic bus capacity and reliability.

- 2.1.14 More recently in 2023, the City Deal transport programme was reprioritised in response to inflationary pressures and changes in travel patterns since the Covid Pandemic. This has resulted in the "Future Investment Strategy 3" (FIS3)⁴ where the GCP Executive Board agreed a new prioritisation framework and range of schemes for delivery. An extract from that paper showing the prioritisation criteria that were agreed is shown in table 1. This prioritisation process is now guiding the GCP in the schemes it delivers.

Table 1 – GCP FIS3 Prioritisation process

Strategic	
How does the scheme facilitate City Deal objectives?	What is the likely impact on facilitating economic growth of doing the scheme vs. not doing the scheme? What is the impact on the labour market of doing the scheme?
How does the scheme facilitate environmental objectives?	Will the scheme clearly support the delivery of net-zero carbon objectives across Greater Cambridge? To what extent will delivery of the scheme result in environmental 'net gain'?
Transport	
What is the impact on people's travel choices?	Overall journey time improvement Impact on journey reliability Capacity improvement Competitiveness analysis of car vs. public transport and/or active travel
Scale of impact	Connecting how many homes to how many jobs, to include: - Existing homes and Enabling or facilitating new homes Connecting different employment sites to encourage knowledge exchange
Overall	
Is the scheme deliverable?	Is the scheme affordable for GCP? Is the scheme deliverable within the City Deal timescales?

⁴ Greater Cambridge partnership Executive Board, 28th September 2023

	Consideration of other factors, including practicality, risk analysis and stakeholder support
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- 2.1.15 The reprioritisation process did not include explicit reference to enabling delivery of sites in the Local Plans. The link between the transport schemes that result from this prioritisation and the need for CIL funding is therefore not clearly made.
- 2.1.16 Therefore, to answer the inspector's question, we conclude there is not an up to date evidence base and a clear relationship or 'golden thread' running through that evidence base to the proposed CIL. It is certainly the case that the schemes in the programme will help movement around Local Plan area but that in itself, is not sufficient to justify a CIL charge.
- 2.1.17 To do so, it is necessary to prove a direct relationship between the schemes proposed and development to come forward. The one must be necessary for the other to come forward. This has not been sufficiently evidenced in the background documents on which the CIL charge is predicated. Therefore, the Councils have not demonstrated that the infrastructure contained within the charging schedule is necessary to deliver development contained in the Local Plans or otherwise.

2.2 2) What is the timescale for implementation of projects and how is this intended to be achieved?

- 2.2.1 The list of strategic transport projects the Councils are seeking funding for through CIL are drawn from the GCP transport programme. These are shown in table 2 alongside published completion dates. Note, this table has been compiled from the Infrastructure Statement⁵ that supported the CIL consultation and the GCP Quarterly Progress Report⁶
- 2.2.2 In addition to the schemes in table 2, the Councils are also seeking funding of £73,125,000 for schemes that have already been delivered, meaning the total programme of strategic transport schemes that it is claimed is necessary to support the Local Plans totals £891,167,000.

⁵ Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy Infrastructure Statement, January 2026

⁶ Quarterly Progress Report, GCP Executive Board, 9th July 2026

Table 2 – Transport schemes in the CIL Charging Schedule

Active Travel – Total cost = £158,331,000		
Addenbrookes Roundabout	Not known	Delivered
Chisholm Trail phase 2	5,000,000	TBC
Hills Road Cycling + schemes	19,705,000	TBC
Madingley Road capacity enhancement	14,548,000	2029
Queen Annes Terrace cycle parking	Not known	Not known
Greenways	119,078,000	2030
Public Transport – Total cost = £529,991,000		
Cambourne to Cambridge Busway	181,349,000	2028
Cambridge Eastern Access Busway	58,472,000	2031
Cambridge South Eastern Transport Busway stage 1	20,770,000	2027
Cambridge South Eastern Transport Busway stage 2	160,000,000	TBC
Waterbeach to Cambridge Busway	109,400,000	2029
Other schemes – Total cost = £115,353,000		
South West Travel Hub	72,000,000	2027
New Waterbeach Station	43,350,000	2028
Paused Projects – Total cost = £14,367,000		
Foxton Travel Hub	14,043,000	Paused – TBC
Whittlesford Parkway	324,000	Paused - TBC
Total funding sought = £818,042,000		

- 2.2.3 Delivery of these schemes is the responsibility of the Greater Cambridge Partnership and Cambridgeshire County Council. Some of the schemes are currently under development but others are at an early stage of preparation or are conceptual.
- 2.2.4 The GCP is a time limited body, with a life span of 15 years from the commencement of the City Deal in 2014/15. It has secured its final tranche of funding from government and is expected to be wound up in 2030.
- 2.2.5 Delivery of the GCP programme has so far been very slow, with just £73m of the available funding having been spent by the time the Infrastructure Statement was completed. With some of the largest and most complex schemes without a delivery date and delays in planning and delivery that have already been seen across the GCO programme, it therefore seems unlikely that the remainder of the programme will be delivered within the life of the City Deal.
- 2.2.6 At the present time, it is not clear where the responsibility for the City Deal programme and delivery function will move to beyond 2030. Significant changes in governance and funding in the area are on the horizon with the confirmed creation of a Development Corporation arising from the work of the Cambridge Growth Company. The Development Corporation is set to have planning determination powers in early 2027 and thereafter to receive Plan-making powers to prepare a “successor” Local Plan to the emerging Joint Local Plan by the early 2030’s. A development corporation that is a local planning authority becomes a charging authority for the purposes of CIL. It would then need to adopt a charging schedule relating to its area in order for CIL to be chargeable within that area. The Development Corporation is already developing its

own transport strategy and alongside this, the CPCA is developing the Greater Cambridge transport Strategy. It is unlikely therefore, that the current strategic transport schemes and transport programme being led by GCP will remain unchanged after 2030. Indeed, with a new Local Plan and new delivery bodies, it is in fact very likely that the transport strategy will change and the infrastructure necessary to support growth will change along with it.

- 2.2.7 Consequently, there is no certainty on the timeframe for the delivery of the projects for which funding is being sought and indeed no certainty that they will even be pursued to the point of delivery. Indeed, as set out below, the absence of a large amount of funding and the lead in times for consent processes and delivery mean that delivery timescales are highly uncertain.
- 2.2.8 As a result, the Consortium submits that it is wholly unreasonable for the Councils to introduce a new and significant CIL charge at this late stage in the life of the Local Plans and the life of the GCP given this context.
- 2.2.9 Even in the absence of a change to the GCP transport priorities, it should be noted that the current Cambridge City and South Cambridgeshire Local Plans are expected to be replaced in 2028 by a single Joint Local Plan. The new Joint Local Plan will have an evidenced, assessed and targeted Infrastructure Development Plan and transport strategy supporting it. This is under development by the CPCA and will be considered alongside the draft Local Plan at inquiry to determine the soundness of the Plan and is likely to differ from current GCP priorities. It is already supported by a viability appraisal which adopts materially different assumptions from those adopted by the same Councils in relation to the CIL charge before this Examination.
- 2.2.10 Consequently, there is a real timing issue with the current CIL proposals. It is fair to conclude that the CIL proposals are both too late and too early.
- 2.2.11 They are too late because they come nine years after the Local Plans were adopted and which now only have a year or two of life left. The proposals come some 13 years after the TSCSC, which is claimed as the evidence base to support the CIL, was adopted. The evidence base is therefore old and circumstances have moved on significantly since it was prepared.
- 2.2.12 Delivery of the schemes in the transport strategy to be supported by CIL is slow and uncertain. Given that the current Local Plans are expected to be superseded within a year of CIL implementation at best, there will be little if any opportunity for the schemes for which CIL funding has been sought to be delivered.
- 2.2.13 The CIL proposals are also too early in the sense that a more effective approach would be to assess infrastructure required to deliver the new joint Local Plan and seek a CIL charge for that with developer contributions secured in the meantime through the normal s106 process.
- 2.2.14 It would therefore be a better use of resources to pause the current consultation and develop an appropriate mechanism for developer contributions based upon a strong and tested and up to date evidence base related to the intended development strategy to 2045 as set out in the new Local Plan.

2.2.15 In this regard, Community Infrastructure Levy Guidance states that:

Charging schedules are not formally part of the relevant plan but charging schedules and relevant plans should inform and be generally consistent with each other. Where practical, there are benefits to undertaking infrastructure planning for the purpose of plan making and setting the levy at the same time. A charging authority may use a draft plan if they are proposing a joint examination of their relevant plan and their levy charging schedule.

2.2.16 This suggests that a more appropriate approach would be to focus on the next Joint Local Plan and a firm evidence base rather than looking backwards to the TSCSC and the soon to expire Local Plans.

2.3 3) What is the basis for the estimated costs of this infrastructure and are the costs realistic and up to date?

2.3.1 The costs of the strategic transport schemes included in the proposed CIL were reported to the Greater Cambridge Partnership Executive Board in 2025⁷. This report contained estimated costs for delivery of the programme, updated based on construction price inflation and where applicable, any changes in the proposed schemes.

2.3.2 With reference to table 2 above, none of the cost estimates are based upon tender prices or detailed designs save the early phase Greenways. Therefore, apart from the early phase Greenway figures, all are high level estimates and are not the product of a detailed costing exercise.

2.3.3 Construction price inflation remains stubbornly high and experience with the GCP schemes that have been developed so far is that their final budgets and outturns are significantly higher than such initial high level estimates. Previous schemes that have been prepared by GCP, for example the Cambourne to Cambridge busway have shown very wide divergencies from initial scheme estimates as they move towards delivery. Indeed, the GCP Quarterly progress report referenced above notes the significant risk of inflation eroding spending power and thus the ability to deliver the proposed programme. It is to be noted that this risk has not been accounted for in the identification of the funding gap by the Councils.

2.3.4 The overall budget therefore cannot be seen as an accurate assessment of the cost of delivery. As referenced above, the GCP will cease to exist in 2030, and so schemes that are not taken forward by whatever delivery body supersedes it, are unlikely to ever receive a detailed costing exercise. From table 2 above and given the past rate of GCP delivery, the absence of funding to address the funding gap, the long consenting lead in times and long lead in times post-consent, this could be a significant proportion of the programme.

⁷ Greater Cambridge Partnership Executive Board paper on Quarterly Progress Update, 6th November 2025

- 2.3.5 On this basis, the costs proposed do not provide the rigour that is required to justify the implementation of a specific CIL charge.

2.4 4) What is the package of funding for this infrastructure and to what extent is it secured?

- 2.4.1 The City Deal was predicated on an overall transport package valued at £1bn of which half was to be provided by government with the remainder being derived from local sources including developer contributions, New Homes Bonus, Local Transport Plan receipts and other sources. The £500m of government funding has been paid to GCP and as the background documents to the CIL consultation show, £118m of local receipts have already been secured. The balance between the receipts and the overall estimated project costs is the funding gap as explained more fully in relation to Question 6.
- 2.4.2 At present, there is no funding package in place for the whole of the City Deal programme and this forms the basis for seeking the proposed CIL charge. As explained in answer to Question 6 below, however, the projected CIL income will not bridge the funding gap. Indeed, it will not even make a material change to the overall finding gap. The gap will remain.
- 2.4.3 As a result, there is currently no evidence that the funding is available or is likely to be available to deliver the infrastructure for which CIL is proposed. It is not proportionate, rational or reasonable to charge CIL to fund infrastructure development where it has not been demonstrated that there is any reasonable likelihood of the funding being available to enable that infrastructure development to come forward. It is charging a tax on development to fund something without any evidence establishing a reasonable prospect of it happening.

2.5 5) How will the use of S106 contributions change following the introduction of the CILs? Will there be overlap between funding from S106 contributions and CIL for particular infrastructure projects or from particular development proposals?

- 2.5.1 It is understood that the CIL charge will replace all current strategic transport contributions negotiated through s106 agreements. There will remain the requirement for developers to make contributions towards local transport schemes which directly mitigate the impact of development. Although this distinction should be clear, the wide range of schemes in the proposed CIL schedule, not all of which are of a particular strategic nature, means that there is likely to be some cross over.
- 2.5.2 This is most likely to occur with the smaller Active Travel schemes such as the Greenways, and this would need to be carefully managed should the CIL charge be introduced.

2.6 6) Will there be a funding gap which justifies the introduction of the CILs in principle?

- 2.6.1 The funding gap the CIL is seeking to fill is stated in the consultation documents as £272,371,000. This is the gap between the latest project costs for the City Deal programme (£891,167,000) and the funding already received or expected (£618,796,000).
- 2.6.2 However, this figure is simply the gap between the City Deal transport programme and the money the GCP has already received. It is not a funding gap between schemes that have been evidenced as necessary for the Local Plan delivery that can be delivered and receipts expected towards those schemes. The City Deal transport programme has already changed significantly from its first iteration and is likely to change further as the GCP reaches the end of its life and the funding and programme move to another body.
- 2.6.3 Therefore, this is not an appropriate figure on which to base a CIL charge. To meet the requirements of the CIL regulations, the funding gap should be the difference between schemes that have been demonstrated as **necessary** to deliver the Local Plan developments and expected funding, which this figure is not.
- 2.6.4 The justification for the funding gap used by GCP is also unclear given that much of it is attributable to the three major public transport schemes. Of these:
- a) the Cambourne to Cambridge (C2C) scheme was noted as being fully funded at its recent Transport and Works Act Order (TWAO) inquiry, indeed, funding is a requirement in order to make the Order application,
 - b) the Cambridge South East Transport (CSET) is, we understand, funded, enabling it to move towards a Transport and Works Act Order Inquiry at the end of this year.
 - c) The Waterbeach to Cambridge Busway and Eastern Gateway schemes are already expected to be significantly funded by s106. CIL is not, therefore, expected to benefit these schemes to a large extent.

2.7 7) What is the basis for the estimated CIL income? Is this realistic?

- 2.7.1 According to the consultation document, the proposed CIL is expected to secure between £5m and £10m pa, a maximum of £50m to the end of the life of the GCP or a likely maximum of £20m before adoption of the Greater Cambridge Local Plan with a new IDP.
- 2.7.2 Any CIL raised will substitute existing s106 receipts for strategic transport infrastructure. It is not clear if the above figures are net of s106. If not, the likely yield from the CIL will only be 50% - 75% of the stated totals, given recent development experience.
- 2.7.3 Even if the stated funding gap of £272,371,000 is adopted, this low expected yield from CIL will do little to close that gap and deliver the schemes within the transport programme, even if it were used to leverage borrowing which would need to be repaid by CIL receipts. Therefore, it

cannot reasonably be argued that the introduction of CIL will in itself, enable the delivery of developments in the Local Plans or otherwise identified.

- 2.7.4 What is known however, is that securing £50m by the end of the GCP life will not enable the transport infrastructure identified as requiring funding by CIL to come forward. That infrastructure is dependent on other sources of funding which remain wholly unidentified. There is no evidence from which it may be reasonably concluded that there is a likelihood that the transport infrastructure to be funded by CIL will in fact come forward even if all the anticipated CIL is received.
- 2.7.5 In answer to the Inspector's question, we therefore conclude that the proposed CIL charge is not realistic and it has not been demonstrated to be proportionate, rationale or reasonable to impose it.

2.8 8) How much CIL income is estimated to be passed on to Parish Councils/Neighbourhoods? How does this affect the amount to be used on strategic transport infrastructure?

- 2.8.1 [No answer needed]

2.9 9) What is the intended approach to the use of CIL income to support administrative/operational costs?

- 2.9.1 [No answer needed]

3 SUMMARY

3.1.1 Whilst in principle, CIL could be an appropriate mechanism for GCPS to consider as a means of funding strategic transport infrastructure, there are key shortcomings in the current proposal.

- evidence that the schemes to be funded through CIL are necessary to deliver development identified in the Local Plan is not clear. The stated evidence base (the TSCSC) is outdated and the relationship between it and the current CIL proposals has not been demonstrated.
- The costs of the schemes in the transport programme are almost exclusively high level estimates with significant risk around them so there is no certainty of how much of the programme could be delivered, even if the funding were available. It is not therefore a sound basis on which to develop a CIL charge
- there is currently no evidence that the funding is available or is likely to be available to deliver the infrastructure that CIL is to be charged to assist in the delivery of. Even if introduced as proposed, the CIL will only raise around one sixth of the cost of the transport programme by the time GCP ceases to exist or around one twelfth of the cost before the current local plans expire. It is therefore not proportionate, rational or reasonable to charge CIL to fund development where it has not been demonstrated that that development is reasonably likely to come forward.

3.1.2 A more appropriate course and efficient use of resources would be to pause the current CIL plans and to continue utilising the s106 mechanism. This would allow GCPS to consider funding mechanisms for the infrastructure to support the new Local Plan in the light of the emerging new governance and funding regime including the expected creation of the Development Corporation. It would also allow a clear evidence base to be developed and a range of funding mechanisms considered which could include a CIL charge, to endure for the life of the Local Plan.