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South Cambs District Council
Community Infrastructure Levy Consultation
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Dear Greater Cambridge Shared Planning

Greater Cambridge CIL Preliminary Draft Charging Schedule

Thank you for providing Historic England with an opportunity to comment on the CIL draft Charging Schedule, an important source of funding for the infrastructure required to underpin the delivery of sustainable development in Greater Cambridge.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

We note that this charging schedule is being set up primarily to meet the shortfall in funding for proposals set out in the Cambridge and the South Cambridgeshire Local Plans were adopted in 2018 both of which relied on the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) and is largely focussed on transport infrastructure. We provide some comments on this draft charging schedule and supporting information.

The second part of the letter also offers some advice regarding the development of an Infrastructure Delivery Plan to support the emerging Local Plan.

Draft Charging Schedule and Supporting Information

Setting levy rates

Paragraph 203 of the National Planning Policy Framework (NPPF) requires that local planning authorities set out in their Local Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In relation to CIL, it is argued that this means evaluating to what extent the imposition

of CIL will affect future investment in developments which could help secure the future of heritage assets in the area, and thereby jeopardise the delivery of the Plans positive strategy for the historic environment.

We encourage the council to ensure that the conservation of the historic environment is taken into account when determining the level of the CIL to be imposed, along with the types and locations of development that will be liable, in order to safeguard and encourage appropriate and viable uses for vacant or underused heritage assets.

In determining the CIL rates to be put forward in the charging schedule, it is essential that the rates proposed are not likely to discourage schemes being brought forward for the reuse of heritage assets or associated heritage-led regeneration, particularly in areas where there are groups of heritage assets at risk. In such areas, there may be a case for lowering the rates of CIL, possibly through using a finer grained approach to zoning.

Discretionary Relief for Exceptional Circumstances

The Regulations emphasise the need to strike an appropriate balance between the opportunities of funding infrastructure from the levy and the potential effects that may arise through increased pressure on the economic viability of development. For example, there could be circumstances where the viability of a scheme which includes proposals to secure the reuse and long-term viability of a heritage asset is compromised by the requirement for CIL payments.

Vacant or underused heritage assets not only fail to make a full contribution to the local economy but they also give rise to negative perceptions about an area. This, in turn, can detract from its attractiveness to visitors and inward investment. Consequently, in setting thresholds there needs to be a clear understanding of the potential impact which CIL could have on investment in, and regeneration of, historic assets and areas - particularly those which have been identified as being 'at risk'.

We are therefore encouraging local authorities to assert their right to apply discretionary relief for exceptional circumstances; where development which affects heritage assets and their settings and/or their significance, may become unviable if it was subject to CIL.

Paragraph 203 of the NPPF requires that local authorities set out in their Local Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In relation to CIL, this means ensuring that the conservation of its heritage assets is taken into account when considering the

level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment.

The [CIL Relief Information Document](#) recommends that the conditions and procedures for CIL relief are set out in a separate statement, defining exceptional circumstances and setting a clear rationale for their use and justification in terms of the public benefit. In this case an example could be where CIL relief would enable the restoration of heritage assets as identified on Historic England's 'Heritage at Risk Register'.

Recommendation: We note that exemption or relief is mentioned on page 6 of your Supporting Statement. However, no reference is made to discretionary relief for exceptional circumstances; where development which affects heritage assets and their settings and/or their significance, may become unviable if it was subject to CIL. We therefore recommend that this is added both to the Supporting Statement and the Charging Schedule itself.

Infrastructure Delivery Plan (IDP) for emerging draft Local Plan

Moving forward, we assume that you will prepare a new Infrastructure Delivery Plan to accompany the emerging Local Plan. We therefore offer the following advice in relation to IDPs and the wider funding of cultural infrastructure. We discuss the identification of heritage recommendations through heritage impact assessments and the potential for the inclusion of these in the IDP. We provide examples of other IDPs that have incorporated heritage. Finally, we highlight some other IDP topic areas with wider heritage implications. We recommend including these within your IDP.

Infrastructure Delivery Plan

NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ... "

Historic England considers cultural infrastructure to include all heritage assets within the District. The importance of cultural infrastructure to the character, authenticity, creativity and general attractiveness is widely, and increasingly recognised (for example, London now has a Cultural Infrastructure Plan), as is the importance of cultural infrastructure to economic activity and the health and wellbeing of communities. A wealth of information on the value of heritage to our economy, society and environment has been published as part of by Historic England's [Heritage Counts](#) project.

While it is difficult to quantify a requirement for cultural infrastructure, given the importance of

cultural infrastructure, as identified in the NPPF, Historic England asserts that it would be reasonable to expect the plan to aim to at least maintain existing levels of cultural assets that exist within the District, and to seek improvements to secure the long-term future of heritage assets classed as 'at risk'.

Heritage at Risk

Clearly, regimes for the protection of heritage assets are already in place. However, for heritage assets that are identified 'at risk', while a range of mechanisms may be used to save these assets, none of these are guaranteed. Therefore, Historic England is keen that any opportunity to save heritage assets is explored.

To this end, we would recommend that you consider adding to the IDP any heritage assets that have been identified as 'at risk', either at national level, by Historic England, or locally, by your Council.

The national Heritage at Risk Register currently contains the following entries for [Cambridge](#) and [South Cambridgeshire](#).

Funding cultural infrastructure

The Planning Act 2008 (as amended) sets out that CIL can be used to fund the provision, improvement, replacement, operation or maintenance of a wide range of infrastructure in support of the development of the charging area. This can include the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces and public places.

Historic England therefore encourages charging authorities to consider identifying the ways in which CIL, and S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy (NPPF paragraphs 8, 20 and 203).

It is now well established that heritage is not an adjunct to a healthy economy but an important component of growth, a source of employment and a community resource. We therefore suggest that the Council should consider whether any heritage-related projects within the district would be appropriate for CIL funding.

The Local Plan's evidence base may demonstrate the specific opportunities for CIL to help deliver growth and in so doing meet the Plan's objectives for the historic environment. Historic

England requests that the infrastructure lists contained in future Infrastructure Funding Statements include reference to ‘improvements to historic assets related to social, economic or environmental infrastructure’ as a type of infrastructure project which the authority intends may be wholly, or partially, funded by CIL.

Without prejudice to the above, development specific planning obligations and S106 agreements will continue to offer opportunities for funding improvements to heritage assets and the mitigation of adverse impacts on the historic environment. These may include, but are not limited to, archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your schedule.

Need for Heritage Impact Assessments and relationship to Local Plan Policy and IDP

We have previously advised your authority regarding the importance of Heritage Impact Assessments for site allocations. We are pleased to see that these have been prepared. These assessments in turn may help to inform your IDP

The assessments will identify potential impacts on the significance of heritage assets, as well as making recommendations for mitigation and enhancement. Such recommendations might include things like landscaping, set back, careful design, maintenance of key views, reduced heights and densities, open space, heritage buffers, heritage interpretation, heritage conservation and management plans, archaeological investigation.

Other recommendations might include opportunities to conserve and enhance particular heritage assets either on site or nearby through proposals particularly with wider community use options to support a growing population. There may be possibilities for improving public realm, increasing legibility or for supporting existing cultural and heritage facilities to serve a growing population.

The recommendations of the HIAs should be included in Local Plan policy wording and may also need to be included in the IDP where relevant.

Other examples of IDPs with heritage content

Brentwood and South Downs IDPs both include a heritage component.

- Brentwood <https://document.brentwood.gov.uk/pdf/14102019172601000000.pdf>

See chapter 12

- South Downs [Microsoft Word - +IDP Text Submission v1](#)

Other IDP topic areas

a) Transportation

We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. All proposed transport infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

b) Public Realm

For any public realm and streetscape improvements we would highlight [Streets for All – East of England](#). The manual offers guidance on the way our streets are managed. Specifically, it includes advice on traffic management, signage, lighting, ground surfaces and verges etc.

c) Green Infrastructure and the environment

The use of multi-functional greenspaces can help enhance the historic environment by better revealing it and making it more accessible. Therefore, the inclusion of green infrastructure considerations in the IDP should be beneficial to the historic environment and is welcomed.

We support the consideration of Green Infrastructure (GI) at the cross boundary strategic level. It is important not to consider ‘multi-functional’ spaces only in terms of the natural environment, health and recreation. It may be helpful to make further reference in the text to the role GI can have to play in enhancing and conserving the historic environment.

Green Infrastructure can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history.

Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards, hedge rows, tow paths, Registered Parks and Gardens, designed landscapes etc. to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

Closing comments

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which



may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If there any issues you wish to clarify or discuss, please don't hesitate in contacting me.

Yours sincerely

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