29th March 2026

Greater Cambridge Community Infrastructure Levy Consultation

Molly Eyles BSc (Hons) MSc MRICS
E: molly.eyles@savills.com
DL: +44 (0) 7977 030 111

Unex House
132-134 Hills Road
Cambridge, CB2 8PA
savills.com

Sent via email - CIL@greatercambridgeplanning.org

Dear Sir/ Madam,

Greater Cambridge Shared Planning CIL Charging Schedules Consultation - submitted on behalf of Anglia Ruskin University ('ARU')

This representation is submitted by Savills (UK) Limited ("Savills") in respect of the Draft Community Infrastructure Levy ("CIL") Charging Schedules published by Cambridge City Council ("CCC") and South Cambridgeshire District Council ("SCDC"), together operating as Greater Cambridge Shared Planning ("GCSP"). The Draft Charging Schedules have been informed by the Viability Assessment (January 2026) prepared by BNP Paribas Real Estate ("BNP") on behalf of Anglia Ruskin University ('ARU').

This representation is made in the context of The Community Infrastructure Levy Regulations 2010 (as amended) ('the Regulations') and relevant statutory guidance. The most recent amendments to the Regulations and associated guidance came into force on 1st September 2019. The CIL consultation will therefore be subject to the requirements of these latest sets of Regulations and Guidance.

Purpose

1.1 The purpose of this representation is to set out our response to the proposed GCSP CIL Charging Schedule and supporting documents, which have been published for consultation from the 16th February 2026 to 29th March 2026. The CCC and SCDC Draft Charging Schedules have been informed by the Viability Assessment prepared by BNP Paribas Real Estate in January 2026[1].

1.2 ARU is a major UK university with campuses in Cambridge, Chelmsford, Peterborough and Writtle, serving more than 25,000 students and recognised for its strong regional impact and high-quality teaching. ARU holds a position within the 601–800 band of the Times Higher Education World University Rankings 2026, reflecting its growing global reputation, and has been consistently ranked among the top 350 universities worldwide in earlier THE rankings. The University has notable research strengths, with 12 world-leading research areas tackling global challenges including climate change and mental health. ARU's academic mission is delivered through extensive teaching and research across health, life sciences, psychology, business, engineering, social sciences, and the creative industries, with a particularly strong profile in clinical medicine and psychology, where it is internationally ranked.

1 Greater Cambridge: Community Infrastructure Levy Viability Assessment (January 2026)

1.3 ARU has a substantial estate in Cambridge and the wider region, including strategic landholdings linked to its teaching, research, health, and innovation functions. Given ARU's commitment to supporting regional growth and its need for ongoing investment in academic, research, and student facilities, the University may seek to bring forward or acquire further development opportunities within Greater Cambridge.

1.4 To consult on CIL, the Local Authority must demonstrate, through clear, proportionate and publicly available evidence, that there is an infrastructure funding gap and that CIL is needed to help address it. National guidance also requires the authority to prepare a viability assessment that shows the proposed CIL rates would not threaten the viability of development expected to come forward under the Local Plan. This includes ensuring that the cumulative impact of CIL, Section 106 obligations, policy requirements and site-specific infrastructure does not render development undeliverable. It is essential that the viability evidence tests development typologies that genuinely reflect the scale, form and characteristics of sites allocated or anticipated within the emerging Greater Cambridge Local Plan.

1.5 The consultation confirms that CIL is intended to secure funding for the strategic infrastructure needed to support growth, with the Councils aiming to strike an appropriate balance between infrastructure requirements and development viability. ARU supports this objective; however, it is essential that the Charging Schedules are designed in a way that does not disproportionately burden higher-education institutions, does not undermine the viability of strategic educational, health and research facilities, student accommodation, operational space, and fully recognises the significant economic and social contribution that universities make to the region. Universities operate fundamentally differently from commercial developers, they deliver public good, reinvest surpluses to enhance education and research, and directly support key policy priorities such as skills development, innovation, and health workforce training.

1.6 The objective remains to ensure that a reasonable rate of CIL, which allows for the viable delivery of policy requirements for a range of development opportunities which meet sustainability requirements, deliver affordable housing, anticipated residual Section 106/ 278 and other site specific infrastructure.

1.7 In submitting this representation, we are only commenting on particular key areas of the evidence base. The lack of reference to other parts of the evidence base cannot be taken as agreement with them and we reserve the right to make further comments upon the evidence base at the Examination stage.

1.8 Our particular comments in regard to this consultation can be summarised as follows:

- **Application of Charitable Relief –** ARU is a registered charity for the purposes of the CIL Regulations, and therefore may qualify for Mandatory Charitable relief where it holds a material interest in the land and the development is used wholly or mainly for charitable purposes (i.e. not for commercial gain). However, the 2026 Greater Cambridge CIL documents do not state whether Discretionary Charitable relief will be offered. This creates uncertainty for ARU's mixed-use schemes, where Mandatory Charitable relief alone is not sufficient.

- **Local Plan Uncertainty** – Greater Cambridge is currently preparing a new Local Plan to guide development across Cambridge City and South Cambridgeshire. As the Plan is not yet adopted and strategic site allocations and growth locations remain subject to consultation and examination, there is ongoing uncertainty regarding the scale, distribution, and timing of future development.

Introducing CIL rates before strategic sites and growth areas are clearly defined risks misalignment with the emerging Local Plan. The Planning Practice Guidance (PPG) emphasises that viability assessments should reflect planned delivery. Prematurely setting CIL rates may therefore undermine the viability of strategic sites if they do not adequately account for evolving policy requirements, infrastructure expectations, and site-specific constraints. This could therefore necessitate immediate review and amendments to the CIL Charging Schedules to facilitate growth within the Local Plan, creating unnecessary uncertainty and confusion.

- **Wider Local Context Uncertainty –** Consultation is currently underway on the potential establishment of a new Development Corporation in Greater Cambridge. The proposed activities, objectives, geographical scope and planning powers of the Corporation have yet to be defined, creating significant uncertainty around the future planning and development landscape. In parallel, the government's wider programme of local government reorganisation across England adds an additional layer of complexity, further contributing to an uncertain policy and governance context.

1.9 These points are discussed in greater detail in the following sections.

Charitable Exemptions

1.10 The Community Infrastructure Levy Regulations 2010 provide a clear statutory framework for relief for charitable institutions. Regulation 41(1) defines a 'charitable institution', and qualifying bodies are entitled to seek Mandatory Charitable relief under Regulation 43 and discretionary relief (where offered by the Charging Authority) under Regulation 44.

Mandatory Relief

1.11 It remains our view that Mandatory Charitable Relief will have a material and wide-reaching impact on the application of CIL within Greater Cambridge.

1.12 ARU is an exempt charity under the Charities Act 2011. ARU is operated for public benefit, with charitable purposes centred on the advancement of education, learning, and research. The University's core functions, including the provision of teaching facilities, research space, student accommodation, libraries, learning environments, and support services for students and staff, are all intrinsic to these charitable purposes.

1.13 As with other higher-education charities, ARU's charitable status is well established and reflected across its statutory reporting and regulatory framework (with the Office for Students acting as its principal regulator). Accordingly, development undertaken for ARU's educational or research mission, including new academic buildings, student accommodation, health or science laboratories, or supporting infrastructure, would fall within the remit of "charitable purposes" for the purposes of charitable relief under the Community Infrastructure Levy Regulations.

Discretionary Relief

1.14 In reviewing the 2026 Draft CIL Charging Schedules and the associated consultation documents published by Greater Cambridge, we note that no position is set out on whether the Charging Authorities intend to offer Discretionary Charitable Relief under Regulation 44 of the Community Infrastructure Levy

Regulations 2010. The Draft Charging Schedules, Viability Assessment and Infrastructure Statement are all silent on this matter, and do not indicate whether Discretionary Relief will, or will not, form part of the adopted CIL framework.

1.15 This omission is significant. Discretionary Charitable Relief is a well-established and important mechanism within the CIL Regulations, designed to ensure that developments undertaken partly for charitable purposes, including those involving mixed-use or cross-subsidising elements, are treated fairly and in accordance with charity law. For a major educational charity such as Anglia Ruskin University, mixed-use schemes - combining academic, research, innovation and commercial uses - are a normal and necessary part of delivering modern higher-education facilities.

1.16 Without clarity on Discretionary Relief, there is no certainty as to how the Charging Authorities intend to treat development that comprises:

- both charitable and non-charitable uses within a single planning unit;
- phases where charitable and commercial components are integrated structurally or operationally;
- developments which support ARU's charitable mission but contain associated revenue-generating uses needed to make schemes viable.

1.17 In such circumstances, Mandatory Charitable Relief under Regulation 43 cannot fully address the complexities of the University's estate requirements. Discretionary Charitable Relief is the appropriate mechanism recognised by the Regulations to deal with these mixed-use cases, ensuring that only genuinely non-charitable elements attract CIL liability.

1.18 Given the absence of any statement in the consultation documentation, we are concerned that the Councils have not yet articulated their policy position despite this being a material determinant of how the CIL regime will operate for charitable education providers. The lack of clarity risks creating unnecessary uncertainty for institutional landowners and developers, leading to delays, inconsistent interpretation, and potentially avoidable disputes at the point of applying for relief.

1.19 On behalf of Anglia Ruskin University, we therefore request that the Councils:

- Confirm explicitly whether Discretionary Charitable Relief will be made available under Regulation 44; and
- Introduce Discretionary Relief from the outset, recognising the well-established presence of mixed-use educational, research and innovation development across Greater Cambridge.

1.20 Introducing Discretionary Relief now, rather than revisiting it later, would provide certainty, reduce administrative complexity, and ensure that the CIL regime is aligned with the development patterns expected within a global higher-education centre such as Cambridge.

The Emerging Local Plan

1.21 Greater Cambridge Shared Planning is currently preparing a new Local Plan to guide development across Cambridge City and South Cambridgeshire. The most recent stage of the Draft Local Plan was Regulation 18, consulted on between 1st December 2025 – 30th January 2026. This draft sets out the emerging spatial strategy, proposed site allocations and the policy framework that will shape future growth across the area.

1.22 The UK Government is also consulting on options for reorganising local government in Cambridgeshire and Peterborough with the consultation running from 5th February – 26th March 2026. There are four options for reorganisation with the two affecting Cambridge being:

- **Option A (Cambridgeshire County Council):** Proposes two new unitary councils: North-West (Fenland, Huntingdonshire, and Peterborough) and South-East (Cambridge City, East Cambridgeshire, and South Cambridgeshire).

- **Option B (Cambridge City, East Cambs, South Cambs):** Proposes two unitary councils: A "Greater Cambridge" council (Cambridge City and South Cambridgeshire) and a "North Cambridgeshire and Peterborough" council (East Cambridgeshire, Fenland, Huntingdonshire, and Peterborough).

1.23 The creation of a new unitary authority would transfer responsibility for planning, infrastructure delivery and CIL to a new body. This introduces uncertainty around future governance, infrastructure priorities and funding mechanisms. A newly formed authority may wish to review the Charging Schedule, Infrastructure Funding Statement and wider developer contributions framework. As such, a Charging Schedule adopted immediately prior to reorganisation may require early reassessment, which is a relevant consideration when determining appropriate rates and ensuring sufficient viability headroom.

1.24 In addition, the Councils have confirmed (during the CDF Meeting held on the 6th March 2026) that the proposed CIL Charging Schedule continues to be based on the 2018 Local Plan and will require full review once the new Joint Local Plan is adopted. This raises a fundamental question of timing: the Charging Schedule is being progressed before the strategic spatial strategy, infrastructure priorities, and governance arrangements are settled. The Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor’s Transport Strategy, or potential borrowing against future CIL receipts will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.

Conclusion

1.25 ARU supports the principle of a CIL that is transparent, evidence-based and aligned with the delivery of strategic infrastructure across Greater Cambridge. However, the current Draft Charging Schedules raise several areas of concern that must be addressed to ensure that CIL does not inadvertently undermine the delivery of nationally significant higher-education, research and health-related development within the region.

1.26 In particular, the absence of any stated position on Discretionary Charitable Relief creates avoidable uncertainty for ARU and other educational charities whose estates require mixed-use, research-led and innovation-driven development. Mandatory Relief alone cannot accommodate these development forms, and clarification, together with the introduction of Discretionary Relief from the outset, is essential to ensure fair and lawful application of the CIL Regulations.

1.27 Furthermore, the progression of the Charging Schedules ahead of an adoption of the emerging Local Plan, and against the backdrop of potential local government reorganisation and a proposed Development Corporation, presents a risk that the Charging Schedules will require immediate review once strategic spatial, governance and infrastructure arrangements are confirmed. Ensuring that CIL rates are aligned with emerging policy, infrastructure priorities and delivery mechanisms is fundamental to maintaining viability across both strategic sites and regionally important institutions such as ARU.

1.28 ARU therefore respectfully requests that the Councils:

- Provide explicit clarity on the availability of Discretionary Charitable Relief;
- Ensure that CIL rates are fully informed by the emerging Local Plan evidence base; and
- Consider the implications of governance and infrastructure-planning uncertainty before finalising the Charging Schedules.

1.29 Addressing these matters will help ensure that the CIL regime supports, rather than constrains, the delivery of high-quality educational, research and innovation development that is central to Greater Cambridge's economic success and global reputation.

Yours faithfully,

For and on behalf of Savills (UK) Ltd

[redacted]

Abigail Jones MSc (Hons) MRICS
Director – Head of Development

cc. Molly Eyles MSc (Hons) MRICS