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Greater Cambridge Community Infrastructure Levy Consultation

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Dear Sir/ Madam

Greater Cambridge Shared Planning CIL Charging Schedule Consultation - Submitted on behalf of the Cambourne North Landowner Consortium, Martin Grant Land and Endurance Estates (Caxton) Ltd

This representation is submitted by Savills (UK) Limited ("Savills"), on behalf of the Cambourne North Landowner Consortium ("Landowner Consortium"), Martin Grant Land ("MGL") and Endurance Estates (Caxton) Ltd ("EE"), in response to the Greater Cambridge Shared Planning ("GCSP") Draft Community Infrastructure Levy ("CIL") Charging Schedule consultation. This response relates specifically to the proposed mixed-use strategic allocation at Cambourne North.

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, in force since 1st September 2019, apply to this consultation.

Purpose

1.1 Martin Grant Land is a long-established strategic land promoter with a strong track record of delivering high-quality, sustainable development across the UK. Endurance Estates (Caxton) Ltd is also a promoter of land at North Cambourne, with an interest in approximately 20% of the draft allocation. Working alongside the Cambourne North Landowner Consortium, Cambourne North has been promoted for over 15 years as a significant mixed-use development. In Autumn 2025, the Greater Cambridge Draft Local Plan was published for consultation and confirmed Cambourne North as a draft allocation comprising approximately 13,000 homes, 108,000 sqm GIA of employment space, and an extensive range of supporting retail, community, cultural, leisure, education, and sport/open-space uses. This strategic-scale development represents a critical component of Greater Cambridge's future growth strategy.

1.2 MGL, EE and the Landowner Consortium therefore have a strong interest in ensuring that any CIL Charging Schedule adopted in Greater Cambridge is balanced, evidence-led, and aligned with the delivery realities of large strategic sites. A proportionate approach to CIL is essential to securing necessary infrastructure while maintaining the viability of developments on which the emerging Local

Plan depends. The purpose of this representation is not to oppose CIL in principle, but to ensure that any adopted rate enables planned development to come forward.

1.3 This representation responds to the GCSP Draft CIL Charging Schedule and supporting evidence published for consultation between 16th February and 29th March 2026. The Draft Charging Schedules have been informed by the Viability Assessment prepared by BNP Paribas Real Estate (January 2026).

Cambourne North Overview

1.4 Cambourne North is a major proposed allocation comprising 13,000 homes, 108,000 sqm of employment floorspace, a cultural hub and performance venue, a new leisure hub, and a regional "northern forest." The development will be anchored by a new gateway town centre focused around the East West Rail Station, seamlessly integrated with the existing settlement of Cambourne. Cambourne North represents the largest proposed allocation in Greater Cambridge, with potential for up to 18,000 jobs and a new community of approximately 31,000 people.

1.5 Cambourne North will deliver:

- A diverse mix of homes of different sizes, types and tenures;
- At least 24 ha of employment land to support the local and wider Greater Cambridge economy;
- A broad range of community services including health, cultural facilities, at least three dedicated faith spaces, schools, and local centres;
- A regionally significant leisure, recreation and events centre with associated playing fields.

1.6 The proposals will deliver a comprehensive movement and connectivity network integrating the new station, town centre, neighbourhoods, Cambourne High Street, and wider existing settlements.

1.7 This includes:

- Full integration of the East West Rail Station, supported by a mobility hub and high-quality active travel connections;
- Integration of the Cambourne to Cambridge (C2C) busway;
- New dedicated bus, pedestrian and cycle bridges over the A428 and the rail corridor.

1.8 A development of this scale will also require significant utility reinforcements, flood mitigation and water management measures, biodiversity net gain delivery, and compliance with enhanced Building Regulations, including the Future Homes Standard and the Building Safety Levy. Given the multi-decade build-out period, the full extent of future national and local policy requirements cannot yet be known. The planning obligations framework must therefore retain the flexibility to respond to evolving regulatory, environmental and infrastructure demands.

1.9 In the wider Greater Cambridge context - particularly the emerging Local Plan, the proposed Development Corporation, and potential Local Government Reorganisation - there are several forthcoming changes that may materially influence the planning and infrastructure landscape for Cambourne North. MGL and the Landowner Consortium therefore question the timing of this CIL consultation and remain concerned that the proposed CIL rates are not based on a sufficiently robust or stable evidence base. Separate policy and funding programmes for strategic infrastructure may also emerge, reinforcing the need for caution before introducing an additional charging mechanism.

The Viability Testing

1.8 BNP Paribas Real Estate were appointed to assess development viability across Greater Cambridge in the context of proposed CIL rates and emerging Local Plan requirements. However, several concerns have been identified in the assumptions adopted, many of which are set out in other Savills representations.

1.9 MGL, EE and the Landowner Consortium are particularly concerned that the methodology does not adequately test strategic-scale development, despite such sites forming a fundamental component of the emerging Local Plan. The use of generic typologies fails to reflect the scale, infrastructure burden, phasing or delivery complexity of sites such as Cambourne North. As a result, the evidence base does not present a realistic understanding of how CIL would interact with viability for the very sites the spatial strategy relies upon.

1.10 We note that the largest residential-led typology tested comprises 7,335 dwellings, which is materially below the scale of Cambourne North. No typology of an equivalent size or complexity has been tested. Accordingly, the assessment does not represent the full spectrum of development required to deliver the Local Plan. For a strategic site of Cambourne North’s scale and long-term trajectory, the risks to deliverability arising from an inappropriate or untested CIL charge are significantly higher.

1.11 Strategic sites also face substantial upfront costs associated with major infrastructure and off-site works. A large proportion of these costs arise early in the development process, resulting in significant cashflow pressures. It is therefore essential that the cumulative burden of CIL, Section 106 obligations, policy requirements and site-specific infrastructure does not undermine deliverability. Ensuring strategic allocations remain viable is critical to achieving the housing and infrastructure objectives of the Local Plan.

Section 106 Obligations vs. CIL

1.12 The Viability Assessment applies a Section 106 allowance of £46,000 per dwelling for strategic allocations. Under national guidance, the introduction of CIL should ordinarily lead to a material reduction in Section 106 obligations, with CIL funding the majority of strategic infrastructure and Section 106 reserved solely for site-specific mitigation.

1.13 The approach proposed for Greater Cambridge diverges significantly from this principle. The Councils have confirmed that CIL will fund only strategic transport infrastructure, while all other forms of infrastructure-including education, open space, community facilities, utilities, biodiversity net gain and site-specific works-will continue to be secured through Section 106. Consequently, Section 106 costs will not reduce following CIL adoption; instead, CIL will operate as an additional charge on top of substantial existing obligations.

1.14 MGL, EE and the Landowner Consortium are therefore concerned about the scale of Section 106 contributions that will continue to be sought alongside the proposed CIL rates. The combined burden of high S106 requirements and CIL may render the delivery of strategic sites challenging or undeliverable.

1.15 This contrasts strongly with the approach taken in many other authorities for strategic-scale development, where CIL is set at £0 and the major, site-specific infrastructure is secured through Section 106. A clear example is Peterborough City Council, where the CIL examiner determined that applying CIL would undermine the viability of large sites; as a result, residential developments comprising 500 or more dwellings are expressly nil-rated to ensure that strategic infrastructure can be delivered through Section 106 rather than CIL. A similar principle has been applied by Dacorum Borough Council who identified that several large “Identified Sites” would be required to deliver substantial strategic infrastructure directly. As a result, these sites were not be expected to fund further infrastructure through CIL, and were treated as nil-rated locations because their infrastructure burden would otherwise be disproportionate.

1.16 Section 106 provides flexibility and the ability to adjust obligations over time-capabilities that are essential for multi-phased, long-term developments. The Section 106 framework for Cambourne North will be substantial, bespoke, and directly tied to phasing, viability and delivery trajectory. Introducing CIL risks undermining the ability to structure these obligations effectively.

1.17 We are therefore strongly of the view that Cambourne North should be subject to a £0 CIL rate across all development types, including residential and commercial. This is readily justified based on:

- its strategic scale and complexity;
- the significant on-site infrastructure burden, which cannot be delivered through CIL; and
- the need for a bespoke, flexible Section 106 framework to support delivery over several decades.

Conclusion

1.18 Greater Cambridge is currently progressing multiple strategic initiatives, including its emerging GCSLP and its emerging GCDC, as highlighted in other Savills representations, progressing a CIL schedule in parallel with unresolved wider infrastructure responsibilities creates a risk of double charging. For a project of Cambourne North’s scale and complexity, overlapping obligations would materially undermine deliverability.

1.19 Cambourne North is a significant, long-term growth location requiring a bespoke Section 106 framework to deliver its extensive infrastructure requirements. For these reasons, Martin Grant Land, Endurance Estates and the Cambourne North Landowner Consortium respectfully requests that the Councils reconsider that Cambourne North be placed in a dedicated “Strategic Sites” zone and allocated a CIL rate of £0 per sqm. We do not view that CIL is an appropriate mechanism for such a scheme.

1.20 A £0 CIL rate is justified, evidence-led and wholly aligned with the coordinated position of the project team. We would welcome ongoing discussion with GCSP.

Yours faithfully,

For and on behalf of Savills (UK) Ltd

[redacted]

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cc. Molly Eyles MSc (Hons) MRICS