4.2 Representations received by letter summarised

Id	Respondent	Agent name	Topic	View	Representation
209867	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent 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.
209599	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The implication of introducing CIL is that developers would seek a reduction in affordable housing in order to pay for CIL alongside existing Section 106 contributions.
209773	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209686	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209590	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The implication of introducing CIL is that developers would seek a reduction in affordable housing in order to pay for CIL alongside existing Section 106 contributions.

209844	British Land (David Bloy, Planning Director) [132085]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent considers that introducing a Levy now, while the region is also undergoing local government reorganisation, establishing a Development Corporation, and finalising a new Local Plan, adds avoidable complexity that could delay schemes at a time when government and partners are seeking to accelerate growth in the region. Consultation is currently underway on the establishment of a new Development Corporation in Greater Cambridge. The respondent strongly support this and sees the Development Corporation as essential to building on the work of Greater Cambridge Shared Planning Service, unlocking investment and accelerating growth by addressing the region's most significant infrastructure challenges. However, the Corporation's activities, objectives, boundaries and planning powers have not yet been defined, and the timing of its formal establishment remains unclear. Together, this creates uncertainties around how the future planning and development landscape will operate in practice.
209871	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209665	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes. Surveys have consistently shown that people in the area would like to use public transport and active travel more, however the infrastructure and services required to make sustainable travel a genuine option for everyone is not in place. A lack of funding to deliver new infrastructure and services is a key barrier to achieving the sustainable transport our communities require, and a CIL would raise some of the money required every year. When local authorities are required to bid for limited central government funds, longer-term planning is difficult or impossible. Local authorities are

					best placed to plan and deliver new transport infrastructure when funding mechanisms are long-term and under their own control; CIL funding fulfils both of these criteria.
209660	Cambridge Group of Ramblers (Jane Crawford-White, Group Chair) [130382]		Question 3: Do you agree that the Council should introduce CIL?	Support	As Ramblers we fully support the business case for the Planning Authority to implement raising funds via the CIL.
209789	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent supports the proposal to introduce a CIL charge within both Councils geographic areas as an important funding tool to deliver necessary infrastructure, alongside other funding and delivery sources.
209675	Cambridge Living Streets (Linda Jones) [132081]		Question 3: Do you agree that the Council should introduce CIL?	Support	Cambridge Living Streets support in principle the proposal to introduce CIL as a means of beginning to bridge the funding gap.
209853	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent supports the principle of a CIL Charging Schedule that requires all scales of developments to make a contribution to fund infrastructure required to support new development in Greater Cambridge. The respondent believes that there has been a consistent under funding of essential social and physical infrastructure, necessary to support our communities. The introduction of CIL would ensure a clear, transparent basis for collecting financial contributions from development, to support delivery of the necessary infrastructure the area needs. Creating greater certainty should also help ensure development continues to come forward, providing rates are set that do not prevent or unduly delay development.

209608	Dr Alan Lawrence [131259]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes. There is a significant shortfall in the funding required to create a good transport network for walking and wheeling, and bus funding is unclear. Also the council will be better able to make long term plans given a reliable source of funding as opposed to piecemeal negotiations on S106s.
209580	Edward Leigh [132083]		Question 3: Do you agree that the Council should introduce CIL?	Comment	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.
209902	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle that development should contribute towards the delivery of necessary infrastructure. However, is worried that the timing of the CIL consultation is not yet appropriate, given the other consultations currently underway and the potential impacts these may have. The purpose of this representation is not to

					oppose CIL; rather, it seeks to ensure that a reasonable rate is set which enables planned development in the area to come forward.
209639	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes CIL offers a fairer and more predictable means of funding essential community and infrastructure improvements. For Girton this is particularly important because: • the parish has limited development opportunities and therefore receives few Section 106 contributions • yet faces significant infrastructure pressures created by movements through the village from Girton, Histon, Oakington, Eddington and North West Cambridge • and requires investment in pavements, verges, drainage, open spaces, community facilities and active-travel infrastructure Established communities like Girton risk falling behind newer developments that benefit from major upfront infrastructure investment. CIL helps rebalance this by enabling strategic contributions from wider growth to support the infrastructure that existing villages rely on. Girton Parish Council also recognises that long-term community sustainability requires a balanced and realistic approach to future development. While the parish values the distinct identity of Girton and wishes to avoid unmanaged expansion or loss of character, we also acknowledge the need for affordable homes for younger residents, improved primary care capacity and investment in recreation, burial land and open space. Development Corporations typically rely on value capture from land uplift to fund infrastructure; however, much of the uplift from Local Plan allocations has already been realised. This may mean that future infrastructure funding will need to come from land outside existing allocations, including publicly owned land, provided that any such development is plan-led,

					infrastructure-funded, aligned with Neighbourhood Plan principles and capable of delivering genuine community benefits.
209934	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent has no “in principle” objection but makes the following comments. The two charging authorities have come to the decision to introduce CIL comparatively late, having relied up to now on Section 106 obligations. The respondent is concerned to ensure there is no “double counting” in respect of the ongoing S.106 regime and the introduction of CIL with the authorities continuing to use S. 106 obligations as the primary mechanism for securing community and on-site infrastructure. The respondent has registered charitable status and is concerned there is no reference in the consultation to the CIL Regs provisions for Mandatory (Reg 43) and Discretionary (Reg 44) charitable relief, especially given the importance of the University and its colleges locally, nationally and internationally. The respondent would seek such relief on relevant projects and ask that both mandatory and discretionary relief provisions are included within the proposed CIL.
209633	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The CHA acknowledges that there is a need for more Community Infrastructure as well as proper maintenance of existing infrastructure and as a matter of principle agrees that new development should pay for incremental infrastructure demanded by that development and that the cost of maintaining existing infrastructure should be borne across the wider body of new and existing development.
209766	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle that development should contribute towards the delivery of necessary infrastructure. However, the respondent is worried that the timing of the CIL consultation is not yet appropriate, given the other consultations currently underway and the potential impacts these may have. The purpose of this representation is not to oppose CIL; rather, it seeks to ensure that a

					reasonable rate is set which enables planned development in the area to come forward.
209920	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 3: Do you agree that the Council should introduce CIL?	Comment	Whilst there is no in principle objection to CIL, in our representations we have raised concerns about the potential for double counting of contributions through the use of CIL and S106 in tandem. In addition, we have raised serious concerns with the proposed CIL charging schedule as drafted.
209625	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes. CIL provides a clearer and fairer way to secure funding for essential infrastructure. Histon & Impington requires investment in pavements, crossings, drainage, green spaces, recreation facilities and community buildings, but receives few direct Section 106 contributions because major developments are located outside the parish boundary. Despite this, the parish acts as the functional centre for the area, absorbing a significant share of the travel, school-route and recreation pressures created by the surrounding settlements and city-edge developments. CIL provides one of the only mechanisms through which established communities can secure a fair share of strategic infrastructure investment.
209949	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle of ensuring that development contributes appropriately and proportionately towards the infrastructure required to support growth. However, it is important that the proposed CIL does not undermine the deliverability of strategic sites that are already making substantial infrastructure contributions through Section 106 obligations.
209615	IWM Duxford [101244]	Turley (Ms Jenny Page,	Question 3: Do you agree that the	Comment	The respondent supports the introduction of CIL in principle. The need to deliver appropriate infrastructure for the expected growth in Greater Cambridge is acknowledged and

		Director) [8711]	Council should introduce CIL?		this will have to be secured through a number of sources. It is questioned whether the timing is appropriate given that the draft Greater Cambridge Local Plan has only just passed Regulation 18 consultation. The Charging Schedule would be in place well in advance of the adoption of the Greater Cambridge Local Plan. The Local Plan will set out the quantum, location and nature of future development. This has yet to be considered through Regulation 19 consultation or Examination. It is questionable whether assumptions can be made about actual infrastructure requirements for the delivery of individual sites and strategically on the basis of a draft Plan which is yet to be submitted for Examination and can only reasonably be given limited weight.
209942	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent supports the introduction of CIL in principle — but only if CIL rates for employment/logistics development remain viability-positive and competitive in the wider region. The Council's intention to fund strategic transport infrastructure through CIL is clearly set out in the draft consultation documentation. However, CIL needs to be proportionate to the highways improvements which are often site specific. The respondent considers that CIL should not apply to industrial and logistics sites because Industrial/logistics schemes often operate on low margins and face high infrastructure costs, Regional comparisons show that most authorities set CIL at £0 for B-class employment uses, Employment land in Greater Cambridge is strategically essential, Evidence base does not sufficiently assess logistics viability, Employment developments already secure economic and infrastructure benefits, CIL could reduce—rather than increase—infrastructure delivery.
209807	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed,

					necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209847	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 3: Do you agree that the Council should introduce CIL?	Object	The respondent does not consider that it is appropriate or beneficial to introduce CIL Charging Schedules to help fund the Strategic Transport Infrastructure Needs identified in the evidence base for the adopted South Cambridgeshire District Council Local Plan and Cambridge City Council Local Plans, given that both Local Plans are now 'out-of-date' for decision making (i.e. over 5 years old) and both plan periods end in 2031. It is not clear from the evidence base what infrastructure is left to be delivered and the extent it can be delivered during the remainder of the Plan period. It has not been explained in the consultation why the draft CIL schedule is being proposed in isolation to the GCLP, which is being brought forward at the same time and will have a significant impact on the funding and delivery of infrastructure.
209895	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle that development should contribute towards the delivery of necessary infrastructure. However, is worried that the timing of the CIL consultation is not yet appropriate, given the other consultations currently underway and the potential impacts these may have. The purpose of this representation is not to oppose CIL; rather, it seeks to ensure that a reasonable rate is set which enables planned development in the area to come forward.
209909	Martin Grant Land and Endurance Estates (Caxton) Ltd [132095]	Savills (Abigail Jones) [132076]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent comments that the purpose of the representation is not to oppose CIL in principle, but to ensure that any adopted rate enables planned development to come forward.
209647	Ms Hannah Brown [9404]		Question 3: Do you agree that the Council should introduce CIL?	Comment	First, it is noted that the preference for CCC is to retain s.106 agreements as the main source of funding. I disagree with this approach. The CIL format is a clear and transparent

					means of ensuring that the charging is uniform throughout the district and is not subject to developer influence.
209662	National Highways (Mr Philip Porter, Assistant Spatial Planner) [130283]		Question 3: Do you agree that the Council should introduce CIL?	Comment	We have reviewed the document and note that the details set out within the document are unlikely to have a severe impact on the operation of the trunk road and we offer No Comment.
209652	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 3: Do you agree that the Council should introduce CIL?	Comment	Both Newlands and Tritax recognise the need to fund critical infrastructure (e.g. water, power, roads, East West rail, etc) in Greater Cambridge via a range of sources. However, strategic industrial and logistics sites are essential for meeting local plan targets for employment uses. Such development faces significant upfront expenditure on infrastructure which materially impacts on scheme viability. Applying an arbitrary standard CIL rate will render such sites economically unviable resulting in stalled development. Therefore, a zero-rated CIL approach supported by appropriate S106 obligations (where required) is strongly recommended for strategic employment sites and is something that currently works well elsewhere.
209956	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises the need to fund critical infrastructure (e.g. water, power, roads, East West rail, etc) in Greater Cambridge via a range of sources. However, strategic industrial and logistics sites are essential for meeting local plan targets for employment uses. Such development faces significant upfront expenditure on infrastructure which materially impacts on scheme viability. Applying an arbitrary standard CIL rate will render such sites economically unviable resulting in stalled development. Therefore, a zero-rated CIL approach supported by appropriate S106 obligations (where required) is strongly recommended for strategic employment sites and is something that currently works well elsewhere.

209658	Philippa Slatter [132075]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Having been very much involved in the planning and development on the Southern Fringe both as an elected councillor and as a resident, I am writing to emphasise the need for CIL agreements to include appropriate infrastructure as soon as new residents move in. As we know, larger developments can take decades to complete, and even longer for adoption to be resolved. This leaves many new residents without even basic health and education provision, or in competition for resources with 'older' residents of nearby settlements.
209817	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209879	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209837	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises and supports the need to secure funding for strategic infrastructure to enable sustainable growth and close the infrastructure gap in Greater Cambridge. A clear and proportionate local funding approach also shows Government that Greater Cambridge is committed to supporting infrastructure delivery alongside national investment. The respondent recognise the rationale for introducing a mechanism such as CIL to support infrastructure delivery. However, there are significant concerns that the current evidence base does not yet fully reflect the realities of delivering development in Greater

					Cambridge, and greater clarity is needed around the assumptions underpinning the viability evidence.
209861	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent comments that the Councils are consulting on CIL at a time when the emerging Local Plan remains untested and key strategic growth locations are still subject to consultation. The PPG requires that CIL viability testing reflects planned development and the scale and nature of sites on which the plan relies. In the absence of testing for strategic sites, including those expected to deliver significant infrastructure and affordable housing, the evidence base cannot demonstrate that the proposed rates will support, rather than frustrate, the delivery of the spatial strategy.
209887	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209913	Trinity College, Cambridge (Emma Woods) [132073]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports in principle the introduction of CIL. Greater Cambridge is experiencing, and will continue to experience, substantial growth pressure, and a transparent levy mechanism can provide greater certainty for developers, infrastructure providers and the wider community. The respondent recognises the Councils' need to identify and secure infrastructure funding to support growth. However, support is expressly conditional on the charging schedule being built on a complete, accurate and up-to-date evidence base that properly reflects the full range of development typologies present in Greater Cambridge; including, critically, specialist research and development buildings of the kind that underpin the area's economy. The respondent does not consider that the current evidence base meets this standard in its present form. Nor does the charging schedule afford

					strategic sites with the flexibility often needed to facilitate their delivery.
209796	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent notes that the Viability Assessment expresses an ambition to increase developer contributions towards strategic infrastructure through CIL, which has previously relied upon Section 106 contributions alone. It is stated that Section 106 Agreements will continue to be deployed to meet community and on-site infrastructure requirements, with CIL collected primarily for strategic infrastructure. While the ambition to deliver a greater level of contribution towards strategic infrastructure and to pool contributions is welcomed, the respondent is cautious that CIL can both collect the contributions and deliver the infrastructure in a timely manner to support delivery of Super Strategic Sites with capacity for 2,000 or more homes. Furthermore, there is a significant risk that diverting direct and specific contributions from Super Strategic Sites into CIL will frustrate delivery, impact the quality of development, reduce provision of affordable housing and cause delay.
209929	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent has no in-principal objection to the proposed introduction of CIL, which can operate effectively as a mechanism for collecting developer contributions in order to fund delivery of infrastructure. It is appreciated that the Greater Cambridge area faces considerable challenges associated with delivery of infrastructure to support both planned growth and the Government's aspirations for enhanced levels of growth to underpin continued success of its world-renowned economy, in which context CIL could clearly play a valid role. The respondents interests relate primarily to ensuring that introduction of CIL would aid delivery of strategic infrastructure in the area, including that which would support development of largescale strategic sites, such as that at Waterbeach new town, rather than (and specifically avoiding) delaying or prejudicing delivery, with particular regard to viability considerations. It is considered that

					strategic sites should be explicitly nil-rated for the reasons set out in response to subsequent questions.
209962	Wellcome Genome Campus Ltd [131984]	David Lock Associates (Helen Pearson-Flett, Senior Associate) [9604]	Question 3: Do you agree that the Council should introduce CIL?	Object	The respondent considers that CIL should not be introduced. The respondent is fully aligned with the ambition for growth and as a key stakeholder and potential investor, feels passionately about seeing the full potential of Greater Cambridge realised. The challenges to growth, not least the constraints of proper strategic transport infrastructure and the potential value of CIL as a possible mechanism to fund strategic infrastructure are understood. However there is concern about the impact of CIL on the deliverability and viability of development. The current economic climate is challenging, and commercial development in particular is sensitive to economic cycles and changes in demand, competition, rents, yields, debt availability, land and other costs. Having a CIL charge (at the proposed rate), in uncertain conditions could have the effect of constraining development altogether. Further, CIL rates cannot be easily reviewed – a full examination process is generally required and so a CIL charge is absolute, it provides little opportunity to be responsive to challenges and changes in the economy / market. To the contrary, Outline Permissions with a s106, whilst legally binding, have mechanisms that enable review in exceptional circumstances. Even if CIL does not have this damaging effect, the mechanics are such that it will not contribute meaningfully to support wider growth. Receipts from emerging site allocations will only arrive at some distant time into the future. Thus, relying on CIL to deliver strategic infrastructure projects required now, is challenging, with little control over obtaining the funding and limited ability to forward plan for such infrastructure projects.
209782	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner,	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for

		Planning) [130582]			Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209600	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes
209774	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209687	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209591	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes
209872	Brockton Everlast c/o	Bidwells (Miss Charlotte Tate,	Question 4: Do you agree that the	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy

	Bidwells [132069]	Principal Planner) [131107]	Council has demonstrated a funding gap?		does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209666	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes. Cambridge Area Bus Users agrees that the Council has demonstrated a funding gap, however the consultation vastly underestimates its size.
209790	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent notes that evidence for an infrastructure funding gap has been presented in an infrastructure funding statement and that this gap is focused on highways and other transport infrastructure rather than a wider infrastructure funding gap. It is noted that the supporting infrastructure study was concluded in 2015 and while this specifically supports the current, adopted Local Plan to which the draft charging schedules relate, the additional growth proposals in the emerging new Local Plan, and other emerging additional growth ambitions, will require further infrastructure support and funding with a further potential funding gap to be met from available sources.
209671	Cambridge Living Streets (Linda Jones) [132081]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Cambridge Living Streets agrees that the City Council has demonstrated that a funding gap exists in delivering "strategic transport infrastructure".
209831	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that whilst the Councils may have demonstrated a funding gap in relation to their respective existing local plans, the proposed Greater Cambridge CIL is based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater

					Cambridge. The respondent considers that if CIL is to be adopted by the Councils, it should be done so in conjunction with, or following the adoption of the Greater Cambridge Local Plan, so that infrastructure funding and in-kind provision can be aligned with the charging and spending of CIL. Clearly, the GCLP will have a significant impact on the funding and delivery of infrastructure within Greater Cambridge. Furthermore, it is acknowledged that there are budgetary pressures within the Councils at present, which is not helped by external factors including considerable high inflation within the construction industry. However, the Councils should consider the effects that the Cambridge Growth Company ("CGC") and the proposed Greater Cambridge Development Corporation ("GCDC") will have on funding for, and delivery of, strategic transport infrastructure. As it stands, there is little recognition of the anticipated support from these bodies in delivering strategic transport projects, despite them being a significant part of the development context in Greater Cambridge. Whilst it is acknowledged that funding from the CGC is as yet uncommitted, it is anticipated to be so shortly. By postponing the adoption of CIL Charging Schedules, the Infrastructure Statement would be able to consider the significant effects that this funding will have for the Councils.
209609	Dr Alan Lawrence [131259]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes, but it significantly underestimates the funding gap. The Greater Cambridge Infrastructure Statement indicates a large funding gap of £275 million but this is an underestimate as it includes only current GCP projects, not the other projects considered desirable and/or necessary by Cambridgeshire County Council and the CPCA (for example, bus franchising / the Bus Strategy)
209581	Edward Leigh [132083]		Question 4: Do you agree that the Council has	Support	Yes

			demonstrated a funding gap?		
209903	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent considers that 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.
209640	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes The pausing of major transport projects across Greater Cambridge demonstrates a significant gap between infrastructure need and available funding. It also indicates that several infrastructure needs affecting established communities, including Girton, have not been fully identified or costed in existing plans. For Girton this gap is visible in: • deteriorating pavements, verges and drainage systems • ageing recreation and community facilities requiring renewal • increased movement and safety pressures from Eddington, Darwin Green and North West Cambridge • active-travel needs along routes linking Girton, Histon and Oakington • unfunded responsibilities arising from the Girton-parish section of Darwin Green

					CIL is one of the only mechanisms capable of addressing this shortfall for established villages.
209935	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that the magnitude of and funding streams to fill the funding gap are unclear. Contemporary reports (Reg 18 Greater Cambridge Local Plan Infrastructure Delivery Plan October 2025 and CIL Infrastructure Statement January 2026) appear to set out different funding gaps. In terms of funding streams clarity is needed on what is an appropriate S.106 sum to be accounted for in the funding gap. The Chancellor announced on 17 March 2026 additional funding (£800M) for Oxford- Cambridge corridor. How does this impact on the funding gap and therefore the appropriateness of CIL charging rates?
209634	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
209767	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent considers that 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.
209921	Henry Boot Developments	Twenty5 Planning Ltd	Question 4: Do you agree that the	Comment	The supporting documentation identifies that there is a funding gap but clarity is sought about all the funding streams

	Limited [131707]	(Ms Lydia Voyias) [131260]	Council has demonstrated a funding gap?		Greater Cambridge is receiving, including as part of the 'City Deal' and part of the 'Greater Cambridge Oxford to Cambridge corridor' in which the Government recently announced £800 million1. Further, a funding gap should not act as wider brake on development, that would potentially become unviable.
209825	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that whilst the Councils may have demonstrated a funding gap in relation to their respective existing local plans, the proposed Greater Cambridge CIL is based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. The respondent considers that if CIL is to be adopted by the Councils, it should be done so in conjunction with, or following the adoption of the Greater Cambridge Local Plan, so that infrastructure funding and in-kind provision can be aligned with the charging and spending of CIL. For example, the Infrastructure Statement mentions the expected cost of Whittlesford Parkway improvement and expansion but does not mention the draft policy allocation which is anticipated to deliver a significant amount of the identified infrastructure directly through development proposals should landowner proposals be forthcoming. Similarly, the Infrastructure Statement references the costs associated with delivering Cambridge South East Transport but does not reference the role that proposed policy allocation at Grange Farm will have in delivering and extending it. Nor does it make reference to the expansion of Babraham Research Campus or the Cambridge Biomedical Campus. Furthermore, it is acknowledged that there are budgetary pressures within the Councils at present, which is not helped by external factors including considerable high inflation within the construction industry. However, the Councils should consider the effects that the Cambridge Growth Company ("CGC") and the proposed Greater Cambridge Development Corporation ("GCDC") will have on funding for, and delivery of, strategic

					transport infrastructure. As it stands, there is little recognition of the anticipated support from these bodies in delivering strategic transport projects, despite them being a significant part of the development context in Greater Cambridge. Whilst it is acknowledged that funding from the CGC is as yet uncommitted, it is anticipated to be so shortly. By postponing the adoption of CIL Charging Schedules, the Infrastructure Statement would be able to consider the significant effects that this funding will have for the Councils.
209626	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes. The pausing of several major transport projects demonstrates the seriousness of the current infrastructure funding gap. This also highlights that significant infrastructure requirements for established parishes are not fully addressed in current strategic plans. The gap is evident in deteriorating pavements, verges and drainage systems; pressure on crossings and active-travel routes; ageing recreation and community facilities; and facility demand created by residents of Darwin Green, North West Cambridge and surrounding parishes. CIL is one of the few mechanisms available to help address this gap for established communities.
209616	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that the CIL regulations state that local authorities should take account of other sources of available funding for infrastructure when setting CIL rates. This includes funding from other sources such as The Chancellor announced on 17 March 2026 that she was set to double funding for Oxford–Cambridge corridor in move to make it UK’s “Silicon Valley” should be factored in. It is questioned whether this has been accounted for in identifying the gap.

209943	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent does not agree that the Council has demonstrated a funding gap. While the consultation materials suggest the presence of a general infrastructure funding gap, the Council has not demonstrated a clear, quantified, or justified funding gap that warrants imposing CIL on employment/logistics sites such as those along the A14. The respondent considers that the consultation does not adequately demonstrate a funding gap because No quantified shortfall is shown for the strategic transport infrastructure CIL is intended to fund, The viability evidence is insufficiently transparent or detailed No cumulative A14 corridor infrastructure assessment is presented, Funding needs appear to be generalised rather than linked to specific development typologies. The respondent considers that the scale of the funding gap does not justify imposing CIL on employment sites because A funding gap is normal — not a justification for indiscriminate charging, Employment sites already fund significant infrastructure via S106, CIL risks undermining the Council's own employment strategy. The respondent considers that the funding gap case is particularly weak for A14 industrial / logistics sites because Such sites already face high infrastructure costs, The A14 corridor lacks cumulative transport modelling, A14 industrial / logistics sites support strategic economic functions.
209808	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.

209848	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent acknowledges that Greater Cambridge has identified an alleged funding gap in relation to its respective existing local plans, however, this is based on evidence and policy that is now over a decade old. The Infrastructure Statement does not provide any information as to the continued need for the identified strategic transport infrastructure works and the extent to which any such need will be addressed in the emerging GCLP. The consequence of this is that the Councils have failed to consider the infrastructure funding and in-kind provision that will arise from planned development within the GCLP, including the draft allocations. Further, it has not been evidenced what role the Cambridge Growth Company can play in meeting this funding gap. An income of £50m is assumed, however, this has not been substantiated aside from an assumption that more growth is expected than previous years, and should instead be evidenced to demonstrate it is realistic. Notwithstanding our concerns that this level of CIL revenue may not be generated by 2031, it is noted that even with the upper end of £50m by 2031 the CIL rates proposed would not meaningfully close the funding gap over the plan period as this would only equate to 18% of the identified funding gap.
209896	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent considers that 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.

209957	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent notes that the Chancellor has announced £500m of funding to Greater Cambridge and would query whether that has been accounted for in this exercise. Also, the GCP Draft Budget for 2025/26 shows that £809m is required to deliver the projects. It shows funding of £810m, including a 'local contribution' including circa £27m from New Homes Bonus and £230m assumed Section 106 income. We would query why the full assumed Section 106 obligations sum (£230m) has not been accounted for in arriving at the funding gap.
209653	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	We note that the Chancellor has announced £500m of funding to Greater Cambridge and would query whether that has been accounted for in this exercise. Also, the GCP Draft Budget for 2025/26 shows that £809m is required to deliver the projects. It shows funding of £810m, including a 'local contribution' including circa £27m from New Homes Bonus and £230m assumed Section 106 income. We would query why the full assumed Section 106 obligations sum (£230m) has not been accounted for in arriving at the funding gap.
209818	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209880	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The

					transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using ‘appropriate available evidence’.
209838	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent understands that there is a significant strategic transport infrastructure funding gap associated with the GCP programme and that substantial investment will be required to deliver the transport interventions needed to support growth in Greater Cambridge. However, while the existence of the gap is not in question, the explanation of how the current shortfall has been derived remains unclear, particularly in relation to earlier City Deal assumptions about anticipated developer contributions. Greater clarity on how the shortfall has been calculated, and how CIL fits alongside other funding sources, would help provide confidence in the proposed approach. It would also be useful to set out more clearly how CIL income is expected to interact with other funding sources, whether a gap is still likely to remain once CIL is introduced, and how decisions will be made and infrastructure sequencing decided if funding falls short of expectations. Clear and transparent reporting on how CIL funds are collected, allocated and spent, including any unspent balances, will be important to maintain confidence that the money is being used effectively and in a timely way.
209888	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. KMC has undertaken a review of this statement and its full review is appended. Its conclusion finds there are key shortcomings in the current CIL consultation as follows: • There needs to be a ‘Golden thread’ running through the evidence, need and impact to justify implementation of CIL and this is not supported by the evidence base presented

					• The overall package on which the CIL is predicated (TSCSC and City Deal) has not been adequately tested to demonstrate the need for the schemes and the relationship with the development strategy • The original package in the TSCSC and the City Deal transport programme has changed significantly over time, so the link between schemes and development has been further eroded • The CIL will not raise a transformational amount of funding and will not significantly change overall scheme delivery
209914	Trinity College, Cambridge (Emma Woods) [132073]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent partially agrees that the Council has demonstrated a funding gap but states that the funding gap analysis does not adequately account for strategic site complexity. The respondent acknowledges that the Greater Cambridge Infrastructure Statement sets out a range of infrastructure requirements to support planned growth, and that there is a legitimate case for infrastructure investment to be levied from development. However, there is a fundamental concern about the point at which this CIL is being introduced. Whilst being a comprehensive document, the TSCSC was not tested and modelled systematically in the way that would now be expected in the preparation of an Infrastructure Delivery Plan (IDP) to support a new Local Plan. Of the schemes still to be delivered by the GCP, there is not a clear and evidenced link between them and the developments in the Local Plans. Of the big transformational public transport schemes, the Cambourne to Cambridge (C2C) is fully funded, Cambridge South East Transport (CSET) is costed at £160m and in advance of the TWAO inquiry commencing in September 2026 (ahead of CIL implementation) will need to be demonstrated that funding is available. 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. The timing of the current CIL proposal is both too late and too early. It is too late given the current Local Plans, and their associated evidence base are expected to be superseded within a year of implementation – to be effective, it should have been developed concurrent with the adoption of the two Local Plans in 2018.
209380	Trumpington Residents Association (Mr David Plank) [130334]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes, we do agree.
209797	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that while there is clearly a funding gap, it has significant concerns about whether the gap as presented is the right basis upon which to introduce CIL at this time. The CIL charging schedule is being brought forward in advance of the Greater Cambridge Local Plan ('GCLP'), which is being prepared simultaneously and which will have a material effect on both the infrastructure requirements and the funding sources available to meet them. The Infrastructure Statement ('IS') and CIL Supporting Statement are calibrated against adopted local plans with a horizon of 2031, yet the Viability Report has been assessed against the emerging draft GCLP. This creates a fundamental internal inconsistency in the evidence base: infrastructure requirements are assessed against one policy context; viability is tested against another. The IS contains no substantive recognition of the anticipated support from the Cambridge Growth Company ('CGC') or the proposed Greater Cambridge Development Corporation ('GCDC') in delivering strategic transport infrastructure. These bodies represent a significant and proximate source of infrastructure funding that, once committed, could materially alter the scale of the funding gap that CIL is being asked to fill. Proceeding with a charging schedule before this funding position is

					confirmed risks overstating the gap and setting rates at a level that is inconsistent with the development landscape that will actually prevail.
209783	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209601	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Axis is concerned about a number of the inputs and assumptions within the BNP Paribas CIL Viability Assessment which has informed the proposed rates as follows: • Benchmark Land Values – the viability assessment applies a BLV of circa £150,000 per gross acre for smaller sites, which may not meet landowner expectations. We would expect BNP Paribas to test a range of say £150,000-£200,000 per gross acre for smaller sites. • Affordable housing values – The capital values which are adopted for the affordable housing tenures are not clear within the report. These need to be set out please, as the blended capital value for affordable rent of £293psf is considered to be too high, especially when it is compared to the private values. With private values at £372psf, the affordable rent would be close to 80% of private values. • External works – although base build costs appear to be reasonable, the application of 10% external works for flats and 15% for houses on base build costs is low in the current

					market and would not account for any site abnormal development costs, such as earthworks, piling, significant utilities requirement etc. We would suggest that external works are set at a minimum of 20% for all types of housing. • Professional fees – 7% has been applied in all scenarios, which appears to be a little light and should be at least 8%-10% for schemes of a few hundred homes, in order to take account of planning costs and fees. • Biodiversity Net Gain – the costs of BNG can vary significantly depending on the land available on-site and the nature of ecology to enhance. 1.4% of base build costs may not be a sufficient sum, especially if off-site credits are required to deliver 20% net gain in biodiversity. According to Biodiversity Units UK, credits in the south of England range from circa £25,000 to £203,000 per credit. • Sales Rate – The report needs to clarify whether the sales rate of 6 sales per month is for all tenures, or just private units. It should be the case that no more than 3 private sales per month per outlet is applied to the appraisals. • Developer's profit – A profit margin of 17.50% on GDV for private residential is inadequate and this should be a minimum of 20% on GDV. With the affordable at 6% affordable, this would still be circa 17.50% on GDV as a whole, which is in the middle of the PPG range for profit in relation to viability assessments.
209775	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the viability evidence is fundamentally inaccurate and has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them. comments that the modelling does not reflect real market conditions, and the assumptions used, particularly around

					costs, values, developer margins and infrastructure requirements. The assumptions bear little resemblance to the realities of development delivery in the area. Moreover, the cost assumptions within the appraisal are materially inaccurate. comments that the land values, construction costs and design expectations in Cambridge are considerably higher than those assumed in the analysis, resulting in the unrealistic conclusion that development can absorb larger CIL payments than is actually feasible.
209688	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the viability evidence is fundamentally inaccurate and has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them. States that the modelling does not reflect real market conditions, and the assumptions used, particularly around costs, values, developer margins and infrastructure requirements. The assumptions bear little resemblance to the realities of development delivery in the area. Moreover, the cost assumptions within the appraisal are materially inaccurate. States that the land values, construction costs and design expectations in Cambridge are considerably higher than those assumed in the analysis, resulting in the unrealistic conclusion that development can absorb larger CIL payments than is actually feasible.
209592	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Bloor is concerned about a number of the inputs and assumptions within the BNP Paribas CIL Viability Assessment which has informed the proposed rates as follows: • Benchmark Land Values – the viability assessment applies a BLV of circa £150,000 per gross acre for smaller sites, which may not meet landowner expectations. We would expect BNP Paribas to test a range of say £150,000-£200,000 per gross acre for smaller sites.

					• Affordable housing values – The capital values which are adopted for the affordable housing tenures are not clear within the report. These need to be set out please, as the blended capital value for affordable rent of £293psf is considered to be too high, especially when it is compared to the private values. With private values at £372psf, the affordable rent would be close to 80% of private values. • External works – although base build costs appear to be reasonable, the application of 10% external works for flats and 15% for houses on base build costs is low in the current market and would not account for any site abnormal development costs, such as earthworks, piling, significant utilities requirement etc. We would suggest that external works are set at a minimum of 20% for all types of housing. • Professional fees – 7% has been applied in all scenarios, which appears to be a little light and should be at least 8%-10% for schemes of a few hundred homes, in order to take account of planning costs and fees. • Biodiversity Net Gain – the costs of BNG can vary significantly depending on the land available on-site and the nature of ecology to enhance. 1.4% of base build costs may not be a sufficient sum, especially if off-site credits are required to deliver 20% net gain in biodiversity. According to Biodiversity Units UK, credits in the south of England range from circa £25,000 to £203,000 per credit. • Sales Rate – The report needs to clarify whether the sales rate of 6 sales per month is for all tenures, or just private units. It should be the case that no more than 3 private sales per month per outlet is applied to the appraisals. • Developer's profit – A profit margin of 17.50% on GDV for

					private residential is inadequate and this should be a minimum of 20% on GDV. With the affordable at 6% affordable, this would still be circa 17.50% on GDV as a whole, which is in the middle of the PPG range for profit in relation to viability assessments.
209845	British Land (David Bloy, Planning Director) [132085]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that while their masterplan at South Trumpington us still in the early stages of preparation and they have not yet been able to fully evaluate the impact of the draft CIL on the overall viability of the scheme, they do have concerns regarding the assumptions used in the BNP viability assessment. Several of the key inputs do not reflect established industry practice, which in the view of the respondent has led to an overstatement of viability headroom that could produce CIL rates that may not be achievable across Greater Cambridge.
209873	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to

					sustain high design standards that are expected and public benefits such as affordable housing.
209667	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	No. Cambridge Area Bus Users does not consider that appropriate evidence has been used to inform the value given for the proposed infrastructure funding gap. Whilst the Council has demonstrated a funding gap, its size is greatly underestimated. The consultation indicates a funding gap of £275 million, however this is only the gap relating to the Greater Cambridge Partnership's current projects. The consultation therefore doesn’t take into account the sums required to bring about the additional projects Cambridgeshire County Council considers desirable to support the existing Local Plans for Cambridge and South Cambridgeshire. It also doesn’t put a value on the funding required to fulfil Cambridgeshire and Peterborough Combined Authority’s Bus Strategy and Bus Service Improvement plan in Greater Cambridge. The transport infrastructure necessary to ensure the viability of developments in the forthcoming Greater Cambridge Local Plan will undoubtedly increase the funding gap yet further in the future.
209791	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent notes that the viability assessment indicates there is a potential now for significant economic headwinds to increase delivery challenges going forward. While data may not be available for inclusion in the testing that reflects this, it is considered that it would be worthwhile reviewing the conclusions of the study in respect of this to ensure that Its conclusions remains broadly correct. To ensure that the rates continue to strike a good balance between achieving funding for infrastructure and encouraging delivery of development, it may be necessary to undertake an early review following the CIL charge coming into effect.
209854	Cambridge University Hospitals NHS Foundation		Question 5: Do you agree that the Council has used appropriate	Comment	The respondent comments that the viability report makes reference to the fact that rental growth office and R&D space has slowed recently due to increased supply and that it is unclear how this slowing down has been reflected in the

	Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		evidence to inform the proposed rates?		proposed rates. The respondent comments that it is particularly important that the rate set for Offices and R&D does not disincentivise these types of developments coming forward in a timely manner. Transport contributions are generally the main (/only) infrastructure contribution required, and made, by these types of development. Unlike with other types of development where there may be S.106 obligations including affordable housing where a site specific viability assessment can ensure that the development is viable, a non-negotiable levy for Office / R&D leaves no opportunity for negotiation to ensure that these types of developments will continue to make their necessary contribution to the growth of the Greater Cambridge economy.
209832	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent comments that the Viability Review has been conducted in relation to the emerging GCLP, whilst the remainder of the supporting documents are silent on it in relation to infrastructure requirements. Therefore, there is a fundamental misalignment and inconsistency between the infrastructure that the CIL seeks to fund and the assumptions upon which it is viability tested. On this basis, the Councils have not used appropriate evidence to inform the proposed rates. The Draft Charging Schedules fail to consider different development typologies within Greater Cambridge, not least: 1 the role of large-scale strategic sites, whether Office, R&D, or Residential, in delivering infrastructure in-kind; and 2 the commercial differences between the delivery of Offices versus R&D, including sub-divisions within these development types. Currently, the draft Charging Schedules fail to recognise how different types and scales of development contribute to and deliver infrastructure. In particular, the Councils appear not to have considered whether CIL may not be appropriate for

					large scale strategic development which delivers a significant amount of infrastructure in-kind. The comparison with OCC's approach to CIL for Offices and R&D is noted. However, we remind the Councils that the charging schedule referred to only applies to OCC, which is predominantly urban, rather than the wider Oxfordshire area. Therefore, it is not appropriate to directly compare OCC's CIL with the draft charging schedules, which are intended to apply across the whole of Greater Cambridge. Indeed, viability testing underpinning the South Oxfordshire District Council CIL charging schedule (covering some of the hinterland around Oxford) demonstrated that neither office nor industrial development would have been viable with a CIL imposed.
209582	Edward Leigh [132083]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	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.
209904	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent highlights that in viability testing, typologies should reflect the types of development proposed in the Local Plan to ensure that the proposed CIL rates are grounded in the actual economics of local development. To meet the requirements of CIL Examination, the rates must not undermine the deliverability of the Local Plan. This necessitates viability testing on allocated sites expected to come forward, ensuring that housing targets remain achievable once the CIL is applied. In line with the PPG, viability assessments should give particular consideration to strategic sites, especially those essential to delivering the plan's objectives. This includes large-scale developments, sites that enable or unlock adjacent development, and those located within priority regeneration areas. The respondent is concerned that the assumptions on rents and yields for office/R&D and industrial /warehousing floorspace are not differentiated by location. Cambridge functions as a two-tier market in which commercial values vary significantly between prime city-centre locations and secondary or peripheral areas. Without such differentiation, the assessment risks applying city-centre value assumptions to locations where they are not achievable, potentially leading to an overestimation of development viability and, consequently,

					CIL rates that do not reflect the realities of the Cambridge office and industrial markets.
209641	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes Yes, broadly — but with important caveats. Girton Parish Council accepts that the viability evidence follows established national guidance and uses appropriate methods, including typology testing and residual land value analysis. This is broadly suitable for setting indicative CIL rates at a strategic level. However, the Parish Council recognises several limitations: • The assessment is high-level and cannot capture the specific constraints and infrastructure pressures faced by established parishes such as Girton. • The results are highly sensitive to assumptions around build costs, sales values and developer returns, all of which remain uncertain. • Edge-of-city parishes impacted by major developments (Girton, Histon and Oakington) may experience different viability dynamics from those assumed in the model. • In some cases, higher CIL could lead to pressure on affordable housing, creating tension between competing planning priorities. On balance, the evidence is adequate for consultation, but its limitations must be recognised in implementation. Flexibility and monitoring will be essential.
209936	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The respondent is not convinced appropriate evidence (i.e. typologies tested, rentals, build costs, utilities, fees) has been used and tested by BNP – particularly in regard to proposing a single catch all CIL rate across Greater Cambridge of £175 psm for offices and R&D space, which could threaten the viability of R&D and indeed mid tech uses which are supported by the emerging GCLP and the aspirations of

					Government. The respondent is concerned about the viability of larger sites which often require very significant infrastructure, and where cash flow is a significant issue for a master developer. Development costs and reductions in delivery trajectories are exerting real pressure on all development. In such context the respondent would be concerned that any CIL required on strategic sites could add to the cash flow burden and mean that developers are forced to seek reductions in affordable housing, an unintended consequence of raising a CIL on such developments. respondent therefore suggest that the Council reconsiders its single residential CIL rate across the whole area and specifically considers nil rating larger strategic sites.
209635	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The CHA believes that the contribution from new development should be a function of its incremental impact on infrastructure rather than the ability of a particular type of development to pay. It would be wrong for a use that has a massive demand on Community Infrastructure should be enabled because its poor financial viability resulted in it having a low CIL contribution rate. It is also unclear why Offices and R&D should contribute at the rate of £175 pre sqm when Hotels, Shops, restaurants and financial and professional services contribute at the rate of £50 per sqm. Many financial and professional services businesses operate in offices. So there is ambiguity over what rate to charge for development that could be an office used by financial or professional services (i.e. CIL rate of £50) or an office not used by financial or professional services (i.e. a CIL rate of £175). The CHA would argue that a more level playing field should be established between uses that have similar demands on Community Infrastructure. To this end the large variation in rates across uses with similar infrastructure demand characteristics should be reduced by increasing the rate on hotels, shops and restaurants. The rate for Financial and professional services should be revisited and possibly

					incorporated within Office and R&D and the CIL rate reduced to come closer to the increased rate for hotels, shops and restaurants.
209768	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent highlights that in viability testing, typologies should reflect the types of development proposed in the Local Plan to ensure that the proposed CIL rates are grounded in the actual economics of local development. To meet the requirements of CIL Examination, the rates must not undermine the deliverability of the Local Plan. This necessitates viability testing on allocated sites expected to come forward, ensuring that housing targets remain achievable once the CIL is applied. In line with the PPG, viability assessments should give particular consideration to strategic sites, especially those essential to delivering the plan's objectives. This includes large-scale developments, sites that enable or unlock adjacent development, and those located within priority regeneration areas. The respondent is concerned that there is no clear rationale underpinning the selection or sequencing of the residential typologies. In the absence of testing on actual strategic sites, the respondent would expect the typology framework to include incremental steps that reflect the typical scale and form of development coming forward in Greater Cambridge.
209922	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the Council has not appropriately evidenced the proposed CIL rates. The respondent has serious concerns with the proposed development use categories identified in the Draft Charging Schedule for South Cambridgeshire, especially in respect to employment uses. In respect of employment types, the proposed rates are simply not reflective of the wide range of employment types in the Greater Cambridge market, and it is made worse by the proposed grouping of uses, and the fixed setting of a single tariff across such a large and varied geographical area.

209826	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the Viability Review has been conducted in relation to the emerging GCLP, whilst the remainder of the supporting documents are silent on it in relation to infrastructure requirements. Therefore, there is a fundamental misalignment and inconsistency between the infrastructure that the CIL seeks to fund and the assumptions upon which it is viability tested. On this basis, the Councils have not used appropriate evidence to inform the proposed rates. The respondent does not believe that the CIL Charging Schedules recognise how different types and scales of development contribute to and deliver infrastructure. In particular, the Councils appear not to have considered whether CIL may not be appropriate for large scale strategic residential development. The respondent preferred option is to negotiate obligations for large-scale strategic sites on a case-by-case basis, having regard to the in-kind infrastructure that the development is likely to be delivered. This should be the case on both allocated and unallocated sites, to allow for housing delivery to continue circumstances where delivery on allocations is delayed and/or does not come forwards.
209627	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes Yes, broadly — but with important caveats that must be recognised. Histon & Impington Parish Council accepts that the viability evidence appears to follow national guidance, including use of residual land value methodology, typology testing and analysis of local market conditions. The approach taken is broadly appropriate for strategic plan-making and for setting indicative CIL rates. However, we also recognise the limitations raised in the DWP response, which remain important:

					•The viability assessment is deliberately high-level and does not reflect site-specific costs or constraints, particularly in complex village or edge-of-city locations. •The assessment is sensitive to assumptions about sales values, build costs and developer profit margins, all of which remain uncertain in the current economic climate. •In some scenarios, higher CIL could place downward pressure on affordable housing levels, creating a tension between competing policy goals. On balance, the evidence is sufficient for consultation, but must be applied with caution going forward. Implementation should allow for appropriate flexibility, monitoring and responsiveness to changing viability conditions.
209763	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent notes 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 focused on transport infrastructure. The respondent encourages 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.

209950	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent notes that the proposed CIL Charging Schedule sets out a residential levy rate of £60 per square metre across South Cambridgeshire District and that the Community Infrastructure Levy Viability Assessment supporting the proposed charging schedule is based on a range of development typologies. Of the 48 development typologies tested, three relate to new settlements (22, 25 and 26). The Council must be confident that this sample robustly reflects the characteristics the characteristics of large strategic sites and new settlements such as Northstowe which can typically involve significant upfront infrastructure delivery, long build-out periods, complex phasing arrangements, and substantial Section 106 obligations. These factors place additional financial pressures on development viability that may not be fully reflected in viability testing scenarios.
209617	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the proposed rates do not distinguish between office and R&D uses. In doing so it does not recognise the differences in constructions costs between a standard commercial office building and the various types of R&D. The R&D sector ranging from the growing mid-tech use, such as AvTech to the bespoke R&D spaces which need to make provision for the technical requirements frequently necessary to laboratory and research use. Using a single tariff for the whole of Greater Cambridge does not recognise the marked difference in returns between the centre of Cambridge, edge of Cambridge and South Cambridgeshire district. The assessment does not recognise the likely increased costs as a result of future Local Plan policies. For example, the proposed climate change policies. IWM submitted to the Regulation 18 consultation for the Greater Cambridge Local Plan on this point. It is questioned whether the evidence base is complete.

209944	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The evidence base presented by the Council is not sufficiently robust, detailed, or reflective of the specific viability characteristics of industrial/logistics development or the A14 corridor and therefore does not appropriately justify the proposed CIL rates. The respondent considers the Viability Report lacks sufficient industrial/logistics-specific modelling because It does not model modern logistics development, No recognition of higher infrastructure costs on the A14 corridor, No sensitivity testing for CIL impacts on B2/B8 schemes, The evidence does not justify a departure from established regional CIL practice, The Infrastructure Statement does not link infrastructure costs to B2/B8 development, Evidence does not consider the characteristics of B2/B8 sites along the A14 corridor.
209809	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to

					sustain high design standards that are expected and public benefits such as affordable housing.
209849	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. In summary, the CIL viability assessment: 1 Is tested on a very limited range of scenarios which are not reflective of Cambridgeshire's stock of industrial premises; 2 Adopts a single build cost assumption that is lower than the BCIS build costs across many types of industrial development; 3 Fails to have regard to other costs including abnormal costs or provide an allowance for contingency; 4 Applies a single rental value of £195/sqm which fails to reflect the range of values associated with different types of industrial premises and is higher than actual rental values commanded across Cambridgeshire as a whole as well as each of the individual constituent postcode districts; 5 Adopts a single market yield assumption of 5% which is lower than the actual yield achieved across Cambridgeshire's industrial stock; and, 6 Identifies that CIL charging is only viable on greenfield sites under its own testing parameters. This analysis demonstrates that the identified CIL rate cannot be justified. As a minimum, further testing is required in order to consider the impact of the changes to the various inputs that we have identified above. The respondents believes that this will render the application of any CIL in respect of industrial development in Greater Cambridge to be unviable.

209897	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent highlights that in viability testing, typologies should reflect the types of development proposed in the Local Plan to ensure that the proposed CIL rates are grounded in the actual economics of local development. To meet the requirements of CIL Examination, the rates must not undermine the deliverability of the Local Plan. This necessitates viability testing on allocated sites expected to come forward, ensuring that housing targets remain achievable once the CIL is applied. In line with the PPG, viability assessments should give particular consideration to strategic sites, especially those essential to delivering the plan's objectives. This includes large-scale developments, sites that enable or unlock adjacent development, and those located within priority regeneration areas.
209910	Martin Grant Land and Endurance Estates (Caxton) Ltd [132095]	Savills (Abigail Jones) [132076]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent questions the timing of this CIL consultation and remain concerned that the proposed CIL rates are not based on a sufficiently robust or a 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 respondent has several concerns that have been identified in the assumptions adopted, many of which are set out in other representations. The respondent is 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. 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.
209648	Ms Hannah Brown [9404]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Second, on that basis, the level of CIL payment to be charged is low, even on the BNP Paribas report, greater sums can be secured, much higher than the £60 imposed without imposing a constraint on viability. Given the urgent need for infrastructure improvements in Cambridge, and a mechanism for greater funding, the rates proposed are too low, with no clear justification for these reduced rates.
209958	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the proposed levy for distribution and logistics sites has not been appropriately tested for the purposes of CIL testing, rendering the CIL charging schedule unsound without further amendment. The viability assessment only considers 3 typologies relevant to industrial use which use a site coverage of 40 and 50%. The respondent observes a greatly reduced site coverage of nearer 25% in respect of the subject sites owing to evolving policy requirements such as BNG alongside physical constraints such as screening, bunding and yard depths, which are not appropriately considered within the viability assessment. The limited typologies are then effectively used to support the proposed CIL charging levy for the district, irrespective of the scale of development being considered, which is inherently inadequate. As a minimum, the viability assessment should be updated to include the consideration of larger strategic sites in order that the full suite of assumptions could be more readily understood and interrogated. Without such level of detail, it is difficult to properly engage with the consultation exercise.
209654	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	These Representations have been commissioned jointly by Newlands (Cambridge) Limited (‘Newlands’ hereafter) and Tritax Big Box Developments Limited (‘Tritax’ hereafter) in respect of their land interests at Newlands Park Cambridge (A14 Junction 24) and Tritax Park Cambridge (A14 Junction 25) respectively. Both are experienced developers in bringing

					forward strategic industrial and logistics developments across the country. Both Newlands and Tritax are promoting their proposals through Greater Cambridge's Local Plan process and both signed Planning Performance Agreements (PPAs) with the Council in Summer 2025. They consider the current Local Plan's hostile planning policy approach, that does not support any strategic-scale warehousing in the District, to be out of date in the context of current national planning policy guidance. Similarly, both made detailed Representations to Greater Cambridge's Draft Local Plan (Regulation 18) in January 2026 confirming that retaining that policy stance in the emerging Local Plan is 'unsound' and not in line with the current and emerging National Planning Policy Framework (NPPF). It is within that context that these Representations are made.
209819	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the viability evidence is fundamentally inaccurate and has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them. comments that the modelling does not reflect real market conditions, and the assumptions used, particularly around costs, values, developer margins and infrastructure requirements. The assumptions bear little resemblance to the realities of development delivery in the area. Moreover, the cost assumptions within the appraisal are materially inaccurate. comments that the land values, construction costs and design expectations in Cambridge are considerably higher than those assumed in the analysis, resulting in the unrealistic conclusion that development can absorb larger CIL payments than is actually feasible.
209881	Railpen [132064]	Bidwells (Miss Charlotte Tate,	Question 5: Do you agree that the	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there

		Principal Planner) [131107]	Council has used appropriate evidence to inform the proposed rates?		are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to sustain high design standards that are expected and public benefits such as affordable housing.
209839	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent comments that they have reviewed the CIL VA and has concerns regarding the appropriateness of some of the assumptions that have been adopted. This means that cumulatively, the viability of the various typologies that have been tested and thus their ability to sustain the cost of CIL is being overstated. Whilst the CIL VA analysis includes some stress testing of CIL rates in recognition of potential cost and value fluctuations over the market cycle, in our view, a number of the baseline assumptions remain inappropriately optimistic for a study designated to encompass development viability across a broad geographical area and time period. In our opinion, this therefore compromises the effectiveness of the sensitivity analysis in ensuring that the required viability 'buffers' are accounted for within the proposed CIL rates.

209862	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the Viability Assessment appears to model Purpose Built Student Accommodation using a Gross Development Value (GDV) approach derived from market rents and investment yields. This methodology is inappropriate for college-operated PBSA, which is not a revenue-optimised investment product and is neither valued, financed, nor delivered on a GDV basis. Applying market?based GDVs significantly overstates the viability of college PBSA and leads to an inaccurate conclusion regarding its capacity to absorb CIL. St John's also emphasises that Colleges typically deliver high-quality, sustainable accommodation with substantially higher build costs than those assumed by BNP. In addition, College sites are often tightly constrained in Cambridge, frequently in central locations, within conservation areas, and subject to height and heritage limitations, which further increases construction costs. Most College-delivered PBSA does not generate a development profit, as it is delivered solely to meet operational needs rather than to achieve a commercial return. The respondent has highlighted several points in relation to the viability appraisal and seeks further clarification in regard to the justification for adopting a number of the assumptions included within the Viability Assessment.
209889	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are

					urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to sustain high design standards that are expected and public benefits such as affordable housing.
209915	Trinity College, Cambridge (Emma Woods) [132073]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The viability evidence base is materially incomplete in respect of R&D and laboratory development. The construction cost of a purpose-built R&D or laboratory building is substantially higher than that of a standard commercial office building. This cost differential is not marginal, it is fundamental to the building typology, arising from a range of technical requirements that are inherent to laboratory and research use. Industry cost benchmarking data consistently demonstrates that these requirements translate into a construction cost premium of between c.40% and c.50% above comparable standard office construction. The Viability Report does not appear to fully model the construction cost implications of national, adopted and emerging Local Plan sustainability policies. In particular net zero carbon and water efficiency.
209798	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent comments that the evidence base does not use appropriate evidence to inform the proposed rates, for two principal reasons. First, there is a fundamental disconnect between the IS (calibrated to the adopted local plans) and the Viability Report (tested against the emerging GCLP), meaning that the infrastructure the CIL seeks to fund and the assumptions upon which it is viability-tested do not correspond. Second the evidence base contains no adequate

					assessment of the economics of large-scale strategic residential development.
209804	Vistry Group (Linden Homes) (William Wood, Associate Director - Planning) [132080]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the base CIL residential rate of £60 per square metre in itself is not considered excessive. However, it would be beneficial if the final Charging Schedule in the table under the heading statement of compliance were to make explicitly clear that this is to be charged on a "per square metre on the GIA" of the development to reflect paragraph 72 of the CIL NPPG rather than the current wording which simply refers to it as applying on a per square metre basis.
209930	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the Council has not used appropriate evidence to inform the proposed rates, not least in failing to either adequately assess or reflect the circumstances relating to largescale strategic development sites. It is noted that National Planning Practice Guidance (PPG) supports the setting of differential rates to help ensure that the viability of development is not put at risk. This includes that such provisions could include the setting of low or zero levy rates for strategic sites which have low, very low or zero viability. Subsequent passages of the PPG include reference to setting rates in a manner that does not undermine deliverability of the plan. Waterbeach new town is delivered across two planning permissions both of which secured 30% affordable housing, based on respective viability assessments. The respondent considers that the difficulties of achieving the policy target 40% level, in view of the wide-ranging infrastructure requirements associated with the Waterbeach development, supports a nil rate CIL.
209963	Wellcome Genome Campus Ltd [131984]	David Lock Associates (Helen Pearson-Flett, Senior	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The respondent has serious concerns regarding the viability report and the evidence on which the proposed rates are based. Comparison is made to Oxford whereby the CIL rate for office / R&D has recently increased substantially from £33 - £168

		Associate) [9604]			per m2. The respondent states that the work they have seen does not provide a robust basis for a new CIL in Greater Cambridgeshire. The evidence base and resultant proposed rates group together offices and R&D. The same rental values, yields and rent free periods are assumed. That is dangerous and wrong. Similarly, the indicative build costs used do not recognise wet labs or other categories of R&D, which have a completely different build cost profile and indeed rental tone to offices. For greenfield sites, the respondent does not recognise the adopted benchmark land values of between £0.25 million and £0.37 million per gross hectare. Further, the nature of the campus type developments for many life sciences schemes around Cambridge, requires a comprehensive approach to placemaking and a multitude of infrastructure requirements aligned with campus and community building. This cannot be compared to an individual office development and none of this has been taken into account. We see no properly evidenced case that R&D should incur the same rate as offices and thus, the rate itself is not appropriately justified. If CIL is implemented across Greater Cambridgeshire, it is essential that proper regard is had to the characteristics of life science campuses, these are bespoke and it is important that the evidence base reflects this.
209784	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the evidence is fundamentally floored (sic) and cannot be used to accurately assess the true viability of the proposed CIL rates. The evidence lacks the robustness and market realism required to demonstrate that development across Greater Cambridge can viably sustain the proposed levy. The respondent has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them.

209602	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 6: 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?	Comment	No comment
209776	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 6: 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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.

209659	Barnack Estates Uk Limited (Mr Rob Facer) [132052]		Question 6: 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?	Comment	It is understood the imperative need to provide 'value for money' infrastructure and the intend of CIL (which is a tax) is to contribute to this infrastructure. Construction and development are high risk and can be high reward. The challenges existing in the cost and time to gain planning permission, S106, S279 and affordable housing now CIL being added or increased. Site viability is vital for housing and sustainable employment growth. Growth will only take place in regions that are "Development" friendly. Business rate tax is increasing at various levels from April 2026 by circa 8% to 12%. This is a fixed cost to business, already we are experiencing low demand for industrial units, companies wanting to expand but not able to due to increased cost. As an example, a small 93m2 unit 1000 sq/ft will incur a CIL tax of £3,255. This is equal to £3.25 per sq/ft. If the unit is worth £165 per sq/ft that is 1.9%. This is a very high tax. We believe the solution to delivering infrastructure is to reduce bureaucracy, professional fees, administration and construction/delivery costs rather than put up taxes - Productivity. The burden of all taxes placed upon development will constrain sustainable growth due to cost and poor viability. This in turn will reduce employment, VAT receipts, tax from employment (National Insurance), Income Tax and Corporation Tax. We believe the answer is productivity (better value for money) not more tax.
209689	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially

			on the viability of developments?		constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The representer considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The representer considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209593	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 6: 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?	Comment	No comment
209874	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially

			on the viability of developments?		constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209668	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 6: 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?	Object	No. Cambridge Area Bus Users believes that developers could reasonably be asked to pay higher rates than are set out in the charging schedule. The rate proposed for residential developments in Greater Cambridge – £60 per square metre (/m2)is much lower than those charged by neighbouring planning authorities. Huntingdonshire District Council charges £152/m2. East Cambridgeshire District Council charges £70/m2 in Littleport and Soham, £123/m2 in Ely and £159/m2 in the rest of the district. The proposed rate is also less than half of the rate (£125/m2) which was proposed in 2014 for Cambridge City. The justification for such a low rate – compared to historic Cambridge City proposals and to neighbouring planning authorities – is hard to understand.
209674	Cambridge Living Streets (Linda Jones) [132081]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support	Comment	Cambridge Living Streets understands that the Council needs to strike a balance between the scale of the levy and its acceptance by developers, we do think that the charges should be introduced at a higher level. Hotels and retail charges, in particular, appear to be low yet the disruption caused by these developments/re-developments can be considerable, especially for pedestrians. Pavements get

			development and the potential effect on the viability of developments?		closed, damaged and even broken up and walkers/wheelers travel routes get disrupted.
209855	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Question 6: 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?	Comment	The respondent comments that it is reliant on its staff, and their access to housing, to deliver their growing services. Median house prices stand at 12.2 times median income in Cambridge and 10.1 times in South Cambridgeshire. The rates set for Residential houses and flats must not risk the delay in delivery of housing, or the quantum of affordable housing in Greater Cambridge. There is real concern that CIL, in addition to the S.106 obligations assumptions (as set out in the Council's evidence) of £25,000 per unit for residential schemes, and £46,000 per unit for major identified strategic site allocations, will impact delivery and the delivery of affordable housing in particular.
209833	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 6: 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?	Object	The respondent comments that the viability review fails to test the significant differences between build costs of R&D development and Office development, applies highly cautious costing assumptions across the board, particularly by failing to account for abnormal costs on some sites, omitting contingency costs altogether, and failing to assess the costs of achieving BREEAM of 'good' or above on non-residential development, does not use accurate assumptions around sales values, nor does it effectively assess the impact of the proposed CIL rates in different areas.
209610	Dr Alan Lawrence [131259]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Comment	No, I believe the level is too low. The Local Plan wants sustainable travel to be a genuine alternative for everyone in greater Cambridge and this will need much more investment. The rate proposed for residential development (£60/sqm) in particular is much lower than in nearby regions e.g. Huntingdonshire or Ely or indeed than was proposed for Cambridge City in 2014 (£125/sqm).

			support development and the potential effect on the viability of developments?		
209583	Edward Leigh [132083]		Question 6: 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?	Object	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.
209905	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 6: 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?	Comment	The respondent comments that the requirement to strike an appropriate balance cannot be demonstrated while strategic sites remain untested and the Local Plan is still evolving. Without evidence that the proposed rates support the deliverability of the emerging plan's key growth locations, the Councils cannot meet the core requirement of Paragraph 010.

209642	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 6: 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?	Support	Yes Yes, in principle — but with recognised risks. The proposed CIL rates appear proportionate and consistent with national guidance. The distinction between CIL for strategic infrastructure and Section 106 for localised mitigation is appropriate and important for Girton. However, the Parish Council notes the following risks: • The assumption that CIL will be absorbed through reduced land values may not hold true where landowners maintain high expectations. • Higher CIL rates on marginal sites could affect the delivery of affordable housing. • Real-world viability may vary significantly in edge-of-city locations impacted by strategic developments such as Darwin Green and Eddington. • Effective monitoring will be required to ensure the balance remains appropriate as economic conditions change. Girton therefore supports the principle, but emphasises the need for caution, flexibility and a clear approach to viability reassessment where necessary.
209937	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Object	The respondent does not agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments particularly in regard to the high single catch all rate of £175psm proposed for offices and R&D throughout Greater Cambridge. The BNP “Office/R&D” CIL classification could in practice include a wide range of development types, from prime offices in the city centre (use class Egi), out of centre R&D Lab space (use class Egii) and onto mid-tech

			the potential effect on the viability of developments?		developments which can include use classes Egii, B2 and B8 (storage). A single catch all rate of £175psm as proposed to be applied to "offices and R&D" but in practice potentially catching aspects of mid tech, fails to take account of their different typologies, rental profiles and build costs, across what is a very large and diverse geographical area ranging from city centre to rural and brownfield to greenfield.
209636	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 6: 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?	Object	No, the impact on viability should be secondary to the impact on infrastructure and yet this latter point has not been quantified in the assessment.
209769	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 6: 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?	Comment	The respondent comments that the requirement to strike an appropriate balance cannot be demonstrated while strategic sites remain untested and the Local Plan is still evolving. Without evidence that the proposed rates support the deliverability of the emerging plan's key growth locations, the Councils cannot meet the core requirement of Paragraph 010.
209923	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia	Question 6: Do you agree that the Council has struck an appropriate	Object	No, for the detailed reasons set out within these representations, the Council has not appropriately evidenced the proposed CIL rates.

		Voyias) [131260]	balance between additional investment to support development and the potential effect on the viability of developments?		
209827	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 6: 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?	Comment	The respondent comments that there are three fundamental issues with the Viability Review; it applies highly cautious costing assumptions across the board particularly by failing to account for abnormal costs on some sites and omitting contingency costs altogether, it does not effectively assess the impact of the proposed CIL rate in different areas meaning that the proposed tested CIL residential rate does not take into account the significant variation in sales rates throughout Greater Cambridge, the vast majority of residential development within Greater Cambridge would be unviable if 40% affordable housing is pursued in line with the draft GCLP. Corrections to costing assumptions and closer examination of viability against proposed policy requirements are likely to make this worse.
209628	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 6: 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?	Support	Yes Yes, in principle — but with recognised risks. Histon & Impington Parish Council accepts the logic of striking a balance between viability and infrastructure funding. The proposed rates appear proportionate and recognisably aligned with national guidance. However, limitations identified in the DWP response remain important: • The assumption that CIL costs will be absorbed entirely

					through land value adjustments may not reflect real market behaviour, particularly where landowner expectations remain high. • There is a practical risk that increased CIL burdens could affect the delivery of affordable housing on marginal sites. • Effective implementation will require active monitoring and adjustment as real-world viability conditions change. Alongside these caveats, the Parish Council emphasises the importance of maintaining the distinction between: • CIL for strategic infrastructure investment, and • Section 106 for localised, site-specific impacts. This distinction is essential for parishes like ours that face substantial strategic pressures without corresponding levels of local development.
209618	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 6: 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?	Comment	The respondent comments that Greater Cambridge is a large geographical area with a single large urban area which is the primary focus of development to small village settlements within a wider rural area. The proposed levy does not recognise the build costs and rental returns differ for a site in the centre of Cambridge compared to edge of Cambridge or the rural area. It is understood that as in other authorities this could be addressed by using zones to account for location. It appears that the proposed CIL does not recognise the potential additional costs necessary order to comply with development plan policy once the emerging Local Plan is adopted. The draft sustainability policies are highlighted. The viability evidence base has been tested against a construction cost and policy compliance baseline that does not adequately reflect the variation in costs of delivering the

					different typologies of office and R&D buildings in Greater Cambridge.
209945	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 6: 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?	Object	The respondent does not agree that the Council has has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments. The proposed CIL approach would place additional cost pressures on development, particularly for employment/logistics sites, and the evidence presented does not fully justify the level of burden proposed for B2/B8 uses. The viability evidence does not sufficiently test B2/B8 development, so the balance cannot be said to be "appropriate".
209810	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 6: 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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by

					reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209850	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 6: 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?	Object	No
209898	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 6: 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?	Comment	The respondent comments that the requirement to strike an appropriate balance cannot be demonstrated while strategic sites remain untested and the Local Plan is still evolving. Without evidence that the proposed rates support the deliverability of the emerging plan's key growth locations, the Councils cannot meet the core requirement of Paragraph 010.
209959	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Object	The respondent does not not consider that the proposed rates set out within the draft CIL Charging Schedule achieve a balance between supporting infrastructure and viability. The viability assessment concludes that 'the CIL regulations require charging authorities to strike a balance between achieving its aim of meeting needs for affordable housing with raising funds for infrastructure, and ensuring that developments generate acceptable returns to willing landowners and willing developers. The rates above ensure

			the potential effect on the viability of developments?		that these objectives are balanced appropriately….. this study demonstrates that the proposed CIL charges and the Council's flexible approach to applying policy requirements will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for landowners and developers to achieve reasonable returns in line with the requirements of the NPPF.' In response, it has been established that the proposed CIL Charge is not viable, and there is an alternative established method from which to secure contributions towards infrastructure investment (i.e. Section 106 Agreements). Therefore, the proposed CIL Charge will be an additional levy burden on developments that are already at the margins of viability. Adopting the proposed CIL Charge unamended may serve to reduce developer confidence in Cambridge, and push developments currently on the margins of viability to being unviable. There is a nil CIL rate for all forms of economic development in the wider East of England region i.e. Babergh; Bedford; Chelmsford; East Cambs and Hunts.
209655	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 6: 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?	Object	We do not consider that the proposed rates set out within the draft CIL Charging Schedule achieve a balance between supporting infrastructure and viability. The LPVA concludes that 'the CIL regulations require charging authorities to strike a balance between achieving its aim of meeting needs for affordable housing with raising funds for infrastructure, and ensuring that developments generate acceptable returns to willing landowners and willing developers. The rates above ensure that these objectives are balanced appropriately….. this study demonstrates that the proposed CIL charges and the Council's flexible approach to applying policy requirements will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for

					landowners and developers to achieve reasonable returns in line with the requirements of the NPPF.' In response, it has been established that the proposed CIL Charge is not viable, and there is an alternative established method from which to secure contributions towards infrastructure investment (i.e. Section 106 Agreements). Therefore, the proposed CIL Charge will be an additional levy burden on developments that are already at the margins of viability. Adopting the proposed CIL Charge unamended may serve to reduce developer confidence in Cambridge, and push developments currently on the margins of viability to being unviable. There is a nil CIL rate for all forms of economic development in the wider East of England region i.e. Babergh; Bedford; Chelmsford; East Cambs and Hunts.
209820	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 6: 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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the

					scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209882	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 6: 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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209840	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Comment	The respondent comments that development across the country in the current economic climate is challenging. In that context, the Councils should seek to adopt a planning framework which incentivises investment and development in Greater Cambridge, especially given the competition for investment from across the country. Achieving the right balance between securing infrastructure funding and

			support development and the potential effect on the viability of developments?		maintaining development viability is challenging. The respondent supports the principle of funding the infrastructure needed to enable growth, but the Planning Authorities should be cautious about adding further cumulative pressures on development to the extent that schemes become unviable and do not come forward. Development in Greater Cambridge is already subject to a wide range of policy requirements, including affordable housing and workspace provision, sustainability standards, biodiversity obligations and Section 106 contributions. While each of these requirements is supported in principle, their combined impact is significant, particularly in the current market where viability is already under pressure. Section 106 should continue to focus on addressing the direct impacts of individual developments, while CIL is intended to contribute towards wider strategic infrastructure. Greater clarity is needed on how the two mechanisms will operate alongside one another in practice, to ensure that there is no overlap or unintended cumulative pressure. The respondent recognises that the proposed levy is largely intended to support transport infrastructure, which is critical to unlocking sustainable and inclusive growth that Cambridge Ahead has long called for. However, further consideration is needed to ensure that the cost of funding that infrastructure does not inadvertently make it harder for development to come forward. Given current market conditions, it will be important to keep the impact of the levy under review once introduced, to ensure it continues to support delivery as intended.
209863	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Comment	The respondent comments that the viability assessment prepared by BNP adopts a number of assumptions that do not reflect market reality. Residential sales values at the upper end of the range are unsupported by new-build evidence, while agricultural land values and benchmark land values are based on artificially low inputs that do not align with local market evidence. When realistic EUVs and

			support development and the potential effect on the viability of developments?		appropriate premiums are applied, the majority of typologies would be unable to viably deliver policy-compliant affordable housing. This directly conflicts with the PPG requirement that CIL must not undermine the deliverability of the Local Plan, including its affordable housing policies. Taken together, these issues mean that the Councils have not yet demonstrated that the proposed CIL rates strike the "appropriate balance" required by the Regulations between securing infrastructure funding and ensuring that development remains viable. The evidence does not show that the proposed rates would support the deliverability of the emerging Local Plan, nor does it provide the transparency and robustness required for Examination.
209890	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 6: 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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by

					reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209916	Trinity College, Cambridge (Emma Woods) [132073]		Question 6: 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?	Object	The respondent does not agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments for R&D and strategic site development. The viability evidence base has been tested against a construction cost and policy compliance baseline that does not adequately reflect the realities of delivering specialist research and laboratory buildings in Greater Cambridge. As a result, the proposed rates risk being set at a level that could constrain delivery of this strategically important sector. In addition, the proposed approach does not adequately recognise the distinct viability challenges associated with large-scale strategic sites. These sites typically carry significant upfront infrastructure costs, long delivery horizons, complex phasing, and substantial planning obligations, all of which place considerable pressure on scheme viability. The application of a uniform CIL charge in these circumstances risks double-counting infrastructure burdens and undermining delivery. The respondent therefore considers that strategic sites (particularly those expected to deliver significant volumes of R&D and laboratory floorspace) should be subject to a nil or materially reduced CIL rate. This approach would better reflect established practice elsewhere and ensure that critical, plan-led growth locations remain deliverable.
209381	Trumpington Residents Association (Mr David Plank) [130334]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Support	Yes, we do – and note that BNP Paribas's assessment suggests this balance could still be demonstrated with higher rates in real terms of CIL.

			the potential effect on the viability of developments?		
209799	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 6: 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?	Object	The respondent comments that while that balance may well be struck for much of the development anticipated across Greater Cambridge, the respondent is firmly of the view that there is insufficient consideration of the practicalities or implications of placing the same requirements upon Super Strategic Sites as those that might apply to smaller scale development. The challenges and complexities of funding and delivering Super Strategic Sites are materially different from those of standard residential development. Substantial forward funding for infrastructure and the total burden that arises from needing to create whole communities and fully mitigate the impact of development over the long term means an ongoing balancing of priorities, as viability itself varies and is reviewed across delivery cycles. Delivered across decades and across multiple market cycles, strategic scale development will typically involve explicit or de facto Grampian conditions linked to strategic infrastructure. Development will stop if necessary infrastructure is not in place. Affordable housing becomes the residual variable as other non-negotiable mitigation is defined and delivered. Together with South Cambridgeshire we are very aware of the challenges of commencing and maintaining momentum on such sites.
209931	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Comment	The respondents states that, in the case of the respective applications at Waterbeach new town, the Section 106 regime has enabled agreement of suitable infrastructure funding, balanced against affordable housing proportions in the context of viability assessment activities. Both have viability review mechanisms built into the legal agreements that will capture enhancements to either strategic transport or affordable housing provision if an improved viability position is achieved. It also enables timely delivery of infrastructure to be

			the potential effect on the viability of developments?		achieved, control over which is of fundamental importance where Grampian conditions relating to significant infrastructure may be required, as is the case at Waterbeach new town.
209785	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Question 6: 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?	Object	The respondent comments that in practice, introducing CIL at the levels proposed would force trade offs that directly undermine policy objectives, leading to reductions in sustainability performance, design quality and affordable housing. These impacts would materially prejudice scheme deliverability and, ultimately, reduce the likelihood of much needed development coming forward. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209603	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	No comment
209669	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No. Various bus services in Greater Cambridge (e.g. Route 100 from Waterbeach New Town to central Cambridge) are currently supported by S106 funds. It is not evident whether S106 or the CIL will be used to support the bus services that will be required to enable residents of new developments to have a genuine alternative to car travel from the day they move in. It is also not clear whether the local transport infrastructure

					required for new developments (e.g. new bus shelters, cycle parking) will be supported by CIL or S106 contributions. This needs to be fully considered and set out in publicly-available documents.
209792	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent notes that the draft charging rates have been kept low to enable flexibility in the use of CIL and S106 to achieve an optimal approach to infrastructure delivery and this approach supported. Ensuring that strategic sites deliver infrastructure in an effective and timely way is important and will require a clear approach in charging and applying CIL and the use of S106 Agreements. The respondent is aware that some development promoters are of the view that strategic sites should be nil rated for CIL purposes with infrastructure provision and contributions secured only via S106. The respondent is of the view that CIL should continue to apply to strategic sites but that specific CIL policy tools should be used to ensure infrastructure delivery related to them is as effective as possible. In particular, the use of land and infrastructure payments in kind would be more effective than removing CIL liability.
209673	Cambridge Living Streets (Linda Jones) [132081]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	Cambridge Living Streets has concerns about how CIL will operate alongside the Section 106 planning obligations and do not consider that the explanation given is clear enough.
209856	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that the overall approach needs to be made more clear. The respondent acknowledges the statement that "CIL would be used alongside Section 106 planning obligations which are negotiated agreements used to mitigate the impact of development and will continue to be secured towards localised community infrastructure including schools, libraries, doctors surgeries, village halls, play areas, allotments etc." and states there are two key points to be made in this regard recognising that it refers to "including"

	Management) [130588]				and is therefore not an exhaustive list. Firstly, in order for the proposed rates and their viability implications to be properly considered, the expected S.106 obligations also need to be clear. The reference to “including” in the Statement does not do this. Noting that transport is not in this list, that the CIL is to fund transport infrastructure, but that the list above is “including”, it needs to be explicit in what circumstances (if any, and it is assumed to be none) transport contributions towards off-site transport infrastructure might be required by condition or S.106 obligation when a CIL Charging Schedule is adopted. It is acknowledged that necessary on-site and site access improvements would be required to be delivered, but explicit recognition that there would be no requirement for off-site transport improvements by condition or S.106 obligation as part of developments is required. Secondly, it should be explicitly recognised that hospitals as well as GP surgeries and other health and care facilities are necessary infrastructure to be funded.
209834	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent does not dispute that the Infrastructure Statement and CIL supporting statement is clear that the funds are intended for the delivery of strategic transport infrastructure, whilst s106 obligations will continue to be used for other infrastructure such as schools, libraries, doctor’s surgeries, sports facilities, community centres, and green infrastructure. However, neither the Infrastructure Statement nor the CIL supporting statement are draft policy and will not be read as such in practice. As such, there is a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations SPD, which has been approved by South Cambridgeshire Council.
209611	Dr Alan Lawrence [131259]		Question 7: Do you agree that it is clear how CIL will operate alongside Section	Comment	No, it is not clear how CIL will operate alongside Section 106 Planning Obligations. It is not clear by which scheme infrastructure for new developments will be funded, or, in particular, bus services.

			106 Planning Obligations?		
209584	Edward Leigh [132083]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	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.
209906	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recognises that CIL will be used solely to fund strategic transport infrastructure, with all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. As a result, Section 106 costs will not reduce following the introduction of CIL; instead, CIL will operate as an additional charge on top of existing obligations. This contrasts sharply with the approach taken in Oxford. Oxford City Council's CIL Viability Study applied a Section 106 allowance of just £4,000 per residential unit, reflecting a model where CIL is the primary mechanism for funding infrastructure and Section 106 is tightly limited to site-specific requirements. Other authorities adopting CIL have taken a similar approach, applying modest Section 106 assumptions to avoid double-charging and to ensure that CIL replaces, rather than duplicates, existing obligations. Against this backdrop, the £25,000–£46,000 per-unit Section 106 allowances used in the Greater Cambridge Viability

					Assessment appear unusually high and inconsistent with the stated purpose of CIL. If Section 106 is expected to remain at current levels, and CIL is layered on top to fund transport infrastructure, the combined burden risks exceeding viable levels, particularly for strategic sites that already face substantial infrastructure and policy costs. The respondent recommends that CIL for strategic sites above a certain threshold should be set at a nil rate, with major site-specific infrastructure instead secured through Section 106.
209643	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	Yes Yes, with reservations. While the principles are clear in the documentation, Parish Councils do not yet experience systematic early involvement in Section 106 discussions. A workable system requires a structured golden thread of information so that Girton Parish Council can feed real-time evidence directly into District and County infrastructure planning. This includes parish budgets, capital plans, asset-condition data, drainage, verge and pavement assessments, neighbourhood-plan evidence, safety and accessibility work, open-space and community-facility needs, social-value assessments, active-travel and mobility patterns across Girton, Histon and Oakington, and the local impacts arising from Eddington, North West Cambridge and Darwin Green. This governance model is essential to avoid the current fragmentation of information that disadvantages established communities. Girton Parish Council is actively developing a structured evidence base including asset-condition data, gully mapping, pavement assessments, accessibility audits and emerging lifecycle cost modelling. We believe this data allows the Council to contribute effectively to district-level infrastructure planning and ensures that the impacts on

					established communities are accurately represented. We encourage Greater Cambridge to incorporate parish-level evidence into ongoing infrastructure workstreams to support a fair and data-driven approach.
209938	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. Aspects appear unclear. The Draft Planning Obligations SPD included proposals for the funding of both on and off site transport infrastructure (including strategic transport interventions) which seems at odds with Para 1.8 of the BNP report and could therefore give concern to "double counting". The councils also need to clarify their aims in setting the CIL. The CIL rates proposed appear to maximise that for Offices/R&D but that the other rates appear to reflect that the council intend to continue to use S.106 obligations as the primary mechanism for securing community infrastructure. This puts an unfair burden on the office/R&D sector and could stifle development within this sector which is clearly of great importance to the area. This works against the governments wish to see the Oxford–Cambridge corridor become the UK's "Silicon Valley".
209770	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recognises that CIL will be used solely to fund strategic transport infrastructure, with all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. As a result, Section 106 costs will not reduce following the introduction of CIL; instead, CIL will operate as an additional charge on top of existing obligations. This contrasts sharply with the approach taken in Oxford. Oxford City Council's CIL Viability Study applied a Section 106 allowance of just £4,000 per residential unit, reflecting a model where CIL is the primary mechanism for funding infrastructure and Section 106 is tightly limited to site-specific requirements. Other authorities adopting CIL have taken a similar approach, applying modest Section 106

					assumptions to avoid double-charging and to ensure that CIL replaces, rather than duplicates, existing obligations. Against this backdrop, the £25,000–£46,000 per-unit Section 106 allowances used in the Greater Cambridge Viability Assessment appear unusually high and inconsistent with the stated purpose of CIL. If Section 106 is expected to remain at current levels, and CIL is layered on top to fund transport infrastructure, the combined burden risks exceeding viable levels, particularly for strategic sites that already face substantial infrastructure and policy costs.
209924	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No, clarity needs to be provided about the purpose for the CIL funding beyond just strategic projects to ensure there is no double counting of infrastructure costs with S106 and CIL operating in tandem.
209828	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent does not dispute that the Infrastructure Statement and CIL supporting statement is clear that the funds are intended for the delivery of strategic transport infrastructure, whilst s106 obligations will continue to be used for other infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure. However, neither the Infrastructure Statement nor the CIL supporting statement are draft policy and will not be read as such in practice. As such, there is a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations SPD, which has been approved by South Cambridgeshire Council.
209629	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes Yes, with reservations. While the principles are clear in the documentation, Parish Councils do not yet experience systematic early involvement in Section 106 discussions. A workable solution requires a

					structured golden thread of information that ensures parish-level evidence flows directly into District and County infrastructure planning. This must include parish budgets, pavements, crossings, drainage, verge and gully data, open-space needs, recreation strategies, neighbourhood-plan evidence and cross-parish mobility patterns.
209764	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent 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. The respondent suggests that the Council should consider whether any heritage-related projects within the district would be appropriate for CIL funding.
209951	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recommends that clear guidance is produced to explain how CIL will interact with existing Section 106 obligations for strategic sites so that there is no duplication between CIL funded infrastructure and site-specific infrastructure obligations that have been secured.
209619	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that it is unclear which elements of the infrastructure requirements will be delivered through CIL and which through S106 Obligations instead of CIL. The respondent questions whether there is a risk of double counting and suggest further clarity on how this will be avoided would be helpful.
209946	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 7: Do you agree that it is clear how CIL will operate alongside Section	Object	The respondent does not agree that that it is clear how CIL will operate alongside Section 106 planning obligations. The consultation documents do not provide sufficient clarity on how CIL will interact with Section 106 for employment/logistics developments, particularly for sites like

			106 Planning Obligations?		the industrial/logistics developments proposed along the A14 where significant site-specific mitigation will be required. The consultation overview confirms that CIL is intended to fund strategic transport infrastructure across Greater Cambridge. The documents do not clearly set out: Which strategic transport projects will fall under CIL, Which site-specific transport works will remain under Section 106, How the Council will prevent double counting, How obligations differ between residential and employment developments, A clear "Regulation 123 list" style breakdown (even though the formal Reg. 123 list is no longer used, most authorities still publish CIL/S106 demarcation tables for clarity).
209851	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. There appears to be a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations SPD, which has been approved by South Cambridgeshire Council (3 February 2026) and Cambridge City Council Cabinet (24 March 2026) and will be adopted imminently.
209899	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recognises that CIL will be used solely to fund strategic transport infrastructure, with all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. As a result, Section 106 costs will not reduce following the introduction of CIL; instead, CIL will operate as an additional charge on top of existing obligations. This contrasts sharply with the approach taken in Oxford. Oxford City Council's CIL Viability Study applied a Section 106 allowance of just £4,000 per residential unit, reflecting a model where CIL is the primary mechanism for funding infrastructure and Section 106 is tightly limited to site-specific requirements. Other authorities adopting CIL have taken a similar approach, applying modest Section 106 assumptions to avoid double-charging and to ensure that CIL

					replaces, rather than duplicates, existing obligations. Against this backdrop, the £25,000–£46,000 per-unit Section 106 allowances used in the Greater Cambridge Viability Assessment appear unusually high and inconsistent with the stated purpose of CIL. If Section 106 is expected to remain at current levels, and CIL is layered on top to fund transport infrastructure, the combined burden risks exceeding viable levels, particularly for strategic sites that already face substantial infrastructure and policy costs.
209911	Martin Grant Land and Endurance Estates (Caxton) Ltd [132095]	Savills (Abigail Jones) [132076]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent is 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.
209656	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Please refer to Question 3, above. A zero-rated CIL approach, supported by appropriate S106 agreements, is strongly recommended for strategic employment sites. The Councils also consulted on a Planning Obligations SPD in Autumn 2025. It is not clear how that dovetails with CIL. The Draft Planning Obligations SPD also sets out proposals for the funding of both on and off site transport infrastructure (including strategic transport interventions) which seems at odds with Para 1.8 of the LPVA and could therefore give concern to double counting, inconsistent with the CIL 122 Regulations.
209960	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that a zero-rated CIL approach, supported by appropriate S106 agreements, is strongly recommended for strategic employment sites. The Councils also consulted on a Planning Obligations SPD in Autumn 2025. It is not clear how that dovetails with CIL. The Draft Planning Obligations SPD also sets out proposals for the funding of both on and off site transport infrastructure (including strategic transport interventions) which seems at

					odds with Para 1.8 of the LPVA and could therefore give concern to double counting, inconsistent with the CIL 122 Regulations.
209973	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. Further clarity is required. The respondent comments that they understand that the proposed CIL will relate to strategic infrastructure, with all other matters covered by S106 Obligations. However, there is a risk of overlap and potential double-charging. Furthermore, there is already an expectation of some Highway works via S278; there is a new Greater Cambridge Planning Obligations SPD to be adopted; plus there are additional layers of future governance which could potentially include additional CIL mechanisms, including the SDS and a possible Development Corporation.
209841	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent comments that greater clarity would be helpful on how CIL is intended to operate alongside Section 106 in practice. Section 106 should continue to address the direct impacts of individual developments, while CIL is intended to contribute towards wider strategic infrastructure. Clear guidance on how the two mechanisms will work together would provide confidence that there will be no overlap or unintended cumulative impact. Developers need certainty that infrastructure will not effectively be charged for twice through different routes. It will be important that the instalment policy reflects the realities of phased and more complex developments, which might involve longer build-out periods and multiple stages of delivery. Clarity around commencement will also be important, particularly where pre-commencement conditions or ongoing Section 106 discussions affect when development can begin on site. The point at which the levy becomes payable should align with these practical stages of delivery.

209864	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that there is a significant risk of double charging. The SPD anticipates extensive Section 106 contributions for major infrastructure, but the Councils have not set out how these obligations will interact with CIL or how overlap will be avoided. This concern is amplified by the ongoing consultation on the Greater Cambridge Development Corporation (GCDC). Until the GCDC's remit, funding mechanisms and infrastructure responsibilities are confirmed, the Councils cannot demonstrate how CIL, S106 and Development Corporation funding will operate together. Proceeding with CIL in advance of this clarity risks duplication, misalignment and undermining the viability of strategic sites that the GCDC is intended to support.
209917	Trinity College, Cambridge (Emma Woods) [132073]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. The respondents landholdings include a number of strategic development sites within Greater Cambridge, including land associated with the Cambridge Science Park. Strategic sites of this scale and complexity, typically carry significant upfront infrastructure costs, long delivery horizons, complex phasing, and substantial planning obligations, all of which place considerable pressure on scheme viability. The application of a uniform CIL charge in these circumstances risks double-counting infrastructure burdens and undermining delivery. The respondent requests that the Councils introduce a nil rate applicable to strategic sites including Cambridge Science Park and provide additional guidance, prior to submission for examination, on how CIL will interact with S106 obligations.
209800	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent comments that while in theory it is possible to establish a clear distinction between CIL contributions and separate but parallel Section 106 contributions, this alignment will be fixed at a point in time and scope, when a planning permission is granted. This may be workable for development likely to be built within a relatively short time horizon. It is not workable in the context of Super Strategic Sites delivered

					over decades. The SPD does not appear to have been drafted with reference to the emerging CIL charging schedule, and does not make clear how transport-related Section 106 contributions will be calibrated or reduced once CIL is in place. The IS and CIL Supporting Statement indicate that CIL receipts will be directed to strategic transport infrastructure, yet the SPD's transport chapter contains no corresponding assurance that s.106 transport contributions will be reduced to avoid double-charging. For Super Strategic Sites, the risk of a 'doubling' of financial outlay, contributing to CIL whilst also retaining full s.106 transport obligations, is not a theoretical concern and would have material impacts.
209805	Vistry Group (Linden Homes) (William Wood, Associate Director - Planning) [132080]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent notes Section 5 of the Supporting Statement that states that in "summary a CIL will be used to fund strategic transport projects and Section 106 agreements will continue to be used to fund local infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure". From this wording, it is clear that the intention is for there to be double dipping insofar that developments are expected to pay CIL and in addition the expectation that there will be substantial or full s106 payments (contrary to the original purposes of CIL) and where s106 costs are expected to increase substantially over those historically collected.
209932	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent notes from the consultation documents that the intention is for CIL to be collected primarily for strategic infrastructure, whilst Section 106 contributions will continue to be utilised for local community and other on-site infrastructure items. It is important that there is clarity as to items that are to be funded via CIL and those which are to continue to be funded via contributions or direct delivery governed by Section 106 agreements. It is not evident that sufficient clarity exists within the schedule. In respect to largescale strategic development sites there is particular merit in enabling sole reliance on Section 106 agreements to enable adoption of

					more flexible provisions that will more appropriately reflect their implementation over considerable timeframes, realistically multiple decades in the case of Waterbeach new town.
209604	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	More information is required on how CIL instalment payments can be made on developments, where there are a number of phases.
209594	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	More information is required on how CIL instalment payments can be made on developments, where there are a number of phases
209585	Edward Leigh [132083]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	No view
209644	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Yes The staged payment structure appears fair and proportionate and supports predictable infrastructure planning.
209939	Gonville & Caius College (Alison Stanley,		Question 8: Do you agree that the draft instalment policy	Comment	The respondent gives support to the proposed instalment policy, particularly in respect of projects with a CIL Liability of

	Endowment Property Manager) [130583]		strikes the right balance between income and developer cashflow?		over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months.
209925	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Support is given to South Cambridge District Council's proposed instalment policy, particularly in respect of projects with a CIL Liability of over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months.
209630	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Yes The instalment schedule appears fair and proportionate.
209952	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The respondent recognises that the draft CIL charging schedule proposes an Instalment Policy which allows CIL payments to be made in staged instalments depending on the total liability. This approach is strongly supported by Homes England. Large-scale developments such as Northstowe are typically delivered over extended timeframes through multiple development phases. For such developments, it is particularly important that the timing of CIL payments aligns with development phasing and cash flow.
209947	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The respondent partially agrees that the draft instalment policy strikes the right balance between income and developer cashflow. While instalments are offered, the draft policy does not strike the right balance for large B2/B8 employment developments or logistics-based sites The instalment timetable is too compressed, does not reflect the cashflow profile of industrial/logistics development, and risks undermining viability. The instalment policies are generic —

					they do not differentiate between development types, development scale, or differing cashflow characteristics. They reflect a standardised approach rather than acknowledging the unique viability constraints of employment land. Specific concerns raised by the respondent includes that Large B2/B8 schemes have fundamentally different cashflow patterns to other development types, The instalment policy's timescales are too front-loaded for logistics development, The A14 corridor lacks cumulative transport assessment, creating further early-stage financial uncertainty, Regional practice reinforces the need for more flexible instalment terms.
209961	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The respondent does not agree that the viability assessment sufficiently adheres to current planning and CIL regulatory standards. The PPG is clear in directing that strategic sites should be considered when establishing updated CIL levies. The absence of strategic employment site typologies means that the viability assessment falls short of planning guidance. It does not reflect the requirements of NPPF Para 87(b) to consider storage and distribution uses at a variety of scales and fails to take account of market signals, as required by NPPF Para. 32. The lack of data being provided falls short of the requirements of the NPPF, CIL guidance, and Viability PPG, and professional guidance which provide an appropriate level of analysis to support such assessments. The respondent does not believe sufficient provision has been made for a viability 'buffer' when interpreting the viability evidence, resulting in the proposed increase in CIL levy. Such buffers are recommended within the current CIL regulations. As a minimum the viability assessment should be updated to include the consideration of larger strategic sites alongside detailed market evidence to allow proper engagement with the consultation process.
209974	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth,	Question 8: Do you agree that the draft instalment policy	Object	The respondent does not agree that the draft instalment policy strikes the right balance between income and developer cashflow. For multi-phase strategic developments,

		Partner, Planning) [131374]	strikes the right balance between income and developer cashflow?		the respondent supports longer instalments and occupation-linked triggers, plus a deferral provision for situations where there is market stress. This would allow CIL payments to better align with sales/income while safeguarding delivery. Small sites should retain simple 2–3 stage options.
209842	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	No
209801	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	The respondent comments that the instalment policy has been designed with no obvious consideration of the cashflow profile of strategic scale development. On a Super Strategic Site, the master developer, not the housebuilder, bears the upfront capital risk: the multi-year negative cashflow period, the infrastructure-first investment, and the planning complexity. The respondent, as master developer, commits its capital before housebuilders are on site. Any CIL liability would fall, in practice, on the entity least able to absorb a fixed, irrecoverable charge against a structurally negative cashflow position in the early phases of delivery. The housebuilder customers who build on fully-serviced and de-risked parcels do so against a transparent cost structure. Introducing CIL into that structure, with crystallisation at outline consent or Key Phase Approval, would alter the investment arithmetic in ways that cannot be mitigated by instalment scheduling. The instalment policy addresses the timing of payment; it does not address the more fundamental problem that CIL, as an instrument, is structurally challenging with the economics and delivery mechanics of Super Strategic Sites.
209806	Vistry Group (Linden		Question 8: Do you agree that the draft	Comment	The respondent comments that the introduction of an instalment policy is noted and generally welcomed. In terms

	Homes) (William Wood, Associate Director - Planning) [132080]		instalment policy strikes the right balance between income and developer cashflow?		of the detail of the policy, in scenarios whereby the levy exceeds £500,000 the whole levy (i.e. 100%) is to be paid by 420 days after the commencement of the development. Where the CIL is less than this sum, the whole payment is to be made in less than a year from commencement. The practical effect of this policy in financial terms is that in the vast majority of cases, the levy cannot be paid from revenue generated by the development as it is unlikely a material number of residential occupations would have occurred at the point in time in which CIL is paid. The payment of CIL will therefore require development finance and its associated cost which for larger developments will have implications in terms of peak funds employed, IRR and ROCE. This increased development finance does not appear to have been modelled within the accompanying viability study and which may therefore be an omission which could overstate viability. The respondent requests that an additional category of site is therefore introduced into the CIL instalment policy for larger developments whereby the CIL instalment policy is a point of agreement. This is important to ensure that larger residential developments are not effectively taxed (levied) out of viability and therefore have the unexpected consequence of undermining the delivery of existing and future Local Plans.
209605	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Axis would need to review the subsequent changes to the viability assessment following our comments before we could seek to confirm this.
209595	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Bloor would need to review the subsequent changes to the viability assessment following our comments before we could seek to confirm this
209672	Cambridge Living Streets		Question 9: Do you agree that the	Support	Cambridge Living Streets agree that the Council has met its regulatory requirements in bringing forward this policy.

	(Linda Jones) [132081]		Council has met all regulatory requirements?		
209835	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent questions whether the regulatory requirements have been met. The Councils have not used appropriate available evidence to inform the preparation of their Draft Charging Schedules. This is because the proposed Greater Cambridge CIL would be based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. With reference to regulation 14(1)(a) of the CIL regulations, it is not considered that the Councils have effectively considered the actual and expected costs of infrastructure, nor have they appropriately taken into account other actual and expected sources of funding. The Councils have failed to consider the real-world development landscape within Cambridge by not assessing the effects of the GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. The Councils have also failed to consider the need for a joined-up funding approach to deliver certain forms of transport infrastructure, such as those which are closely linked to nature recovery. With reference to regulation 14(1)(b), it is not considered that the Councils' have taken a robust approach to establishing the effects of the Draft Charging Schedules on development viability. There is a lack of comprehensive testing, failure to account for the real-world sales values across Greater Cambridge (including spatial variation) when testing the Residential and Office and R&D rates.
209586	Edward Leigh [132083]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	No view
209645	Girton Parish Council (Mrs		Question 9: Do you agree that the	Comment	Yes

	Yvonne Murray, Clerk to Girton Parish Council) [131255]		Council has met all regulatory requirements?		Yes, as far as we can tell. The statutory process appears to have been followed. However, the Parish Council requests confirmation that parish-level evidence has been incorporated into the infrastructure assessment, including: • Girton's pavement and accessibility work (Pavements Are for People) • drainage and gully mapping • the active-travel and mobility links between Girton, Histon and Oakington • impacts from Darwin Green, Eddington and North West Cambridge • recreation-ground and pavilion planning • green-space, verge and biodiversity management • community-wellbeing and resilience priorities tied to mobility and social connection This evidence is essential to ensure that established settlements like Girton are not overlooked as strategic plans evolve.
209940	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent does not agree that the Council has met all regulatory requirements. The CIL policy needs review particularly in regard to the "offices and R&D" category to allow for: a) different rates for different development types – the separate types could be offices (use class Egi), R&D (use class Egii), mid-tech (which can mix use classes Egii and B2,

					B8) , and light industrial (Egiii); and b) different rates for different geographical zones - the separate zones could be Cambridge City centre, outer Cambridge and rural areas. The viability of each development use category should be robustly tested, across a range of locations within Greater Cambridge to demonstrate a CIL rate which can be supported. The proposed rates for other uses including residential look more reasonable but again given the wide and diverse geographical area we would question why there is a single rate applied throughout. The councils CIL proposals make no mention of the CIL Reg 43 Mandatory Charitable exemption. There is no mention of the discretionary charitable exemptions available under Reg 44 to charities for their commercial developments used wholly or mainly for charitable purposes provided that the income arising from those developments will be mainly applied towards the charitable activities of the institution. The respondent considers that the Councils should introduce an exceptional circumstances policy.
209926	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	No, for the detailed reasons set out within these representations, the Council has not met all regulatory requirements. • It is considered the Council should offer discretionary charitable relief available under Reg 44. • It is considered the Council should offer exceptional circumstances relief available under Reg 55.
209829	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior	Question 9: Do you agree that the Council has met all	Object	The respondent questions whether the regulatory requirements have been met. The Councils have not used appropriate available evidence to inform the preparation of their Draft Charging Schedules. This is because the proposed

		Planner) [131590]	regulatory requirements?		Greater Cambridge CIL would be based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. With reference to regulation 14(1)(a) of the CIL regulations, it is not considered that the Councils have effectively considered the actual and expected costs of infrastructure, nor have they appropriately taken into account other actual and expected sources of funding. The Councils have failed to consider the real-world development landscape within Cambridge by not assessing the effects of the GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. In particular the emerging GCLP does not consider large-scale residential schemes within are not considered as a sui generis source of infrastructure funding within the evidence base. With reference to regulation 14(1)(b), it is not considered that the Councils' have taken a robust approach to establishing the effects of the Draft Charging Schedules on development viability. A lack of comprehensive testing, failure to account for the stark differences in sales values across Greater Cambridge, and inadequate input assumptions to the VR, mean that the approach to viability testing is not robust.
209631	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Yes Yes, as far as we can tell. However, the Parish Council requests confirmation that parish-level evidence has been included in the infrastructure assessment, including mobility and active-travel needs, drainage and gully-mapping, pavements and accessibility, public realm pressures and neighbourhood-plan evidence.
209621	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The respondent comments that the CIL Regulations require that the charging schedule be informed by appropriate evidence (Regulation 14(1)(b)) IWM questions whether this is the case as the Viability Report

					does not take into account: • the disparity in construction costs in different typologies within the proposed office and R&D category. • The difference in returns dependent upon location in Greater Cambridge • The costs of the policies in the emerging Local Plan e.g. climate change CIL Reg 55 allows charging authorities to grant relief from liability to pay CIL, if there are exceptional circumstances. It is reasonable to assume that as this is included within the Regulations it is recognised that there are situations which warrant this approach and it is understood a number of other authorities include this within their CIL Charging mechanism.
209948	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The respondent partially agrees that the Council has met all regulatory requirements in bringing forward this policy. While the Council has met the basic procedural requirements for publishing the Draft Charging Schedule and supporting documents, significant gaps in the evidence base, consultation clarity, and statutory justification mean that the Council has not met the regulatory requirements necessary to support the introduction of CIL on B2/B8 employment sites.
209852	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent questions whether the regulatory requirements have been met. The Councils have not used appropriate available evidence to inform the preparation of their Draft Charging Schedules. This is because the proposed Greater Cambridge CIL would be based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. With reference to regulation 14(1)(a) of the CIL regulations, it is not considered that the Councils have effectively considered the actual and expected costs of infrastructure, nor have they appropriately

					taken into account other actual and expected sources of funding. The Councils have failed to consider the real-world development landscape within Cambridge by not assessing the effects of the GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. In particular the emerging GCLP does not consider large-scale residential schemes within are not considered as a sui generis source of infrastructure funding within the evidence base. With reference to regulation 14(1)(b), it is not considered that the Councils' have taken a robust approach to establishing the effects of the Draft Charging Schedules on development viability. A lack of comprehensive testing, failure to account for the stark differences in sales values across Greater Cambridge, and inadequate input assumptions to the VR, mean that the approach to viability testing is not robust.
209657	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	We do not agree that the viability assessment sufficiently adheres to current planning and CIL regulatory standards. The PPG is clear in directing that strategic sites should be considered when establishing updated CIL levies noting Paragraph 005 Reference ID 10-005-2018-724) 4. The absence of strategic employment site typologies means that the viability assessment falls short of planning guidance. It does not reflect the requirements of NPPF Para 87(b) to consider storage and distribution uses at a variety of scales and fails to take account of market signals, as required by NPPF Para. 32. The lack of data being provided falls short of the requirements of the NPPF, CIL guidance noting CIL PPG Para 019 Ref. ID: 25-019-20190901, and Viability PPG Para 010 Ref. ID: 10-010-20180724), and professional guidance which provide an appropriate level of analysis to support such assessments.

					We do not believe sufficient provision has been made for a viability 'buffer' when interpreting the viability evidence, resulting in the proposed increase in CIL levy. Such buffers are recommended within the current CIL regulations noting Paragraph 020 Reference ID: 25-020-20190901. As a minimum the viability assessment should be updated to include the consideration of larger strategic sites alongside detailed market evidence to allow proper engagement with the consultation process.
209975	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent does not agree that the Council has met all regulatory requirements. The respondent has concerns regarding the evidence that has been used to support the proposed CIL charges, the adequacies of the infrastructure list that has been used, and whether developer engagement has been proportionate and representative. These matters should be reviewed carefully, and further consultation undertaken if required to ensure compliance and robustness ahead of any Examination.
209843	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The respondent has no specific comments on regulatory compliance but would emphasise the importance of transparency, clarity and consistency in implementation.
209865	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent comments that the Draft CIL Charging Schedules are not supported by a sufficiently robust or complete evidence base to justify the proposed rates or to demonstrate compliance with the requirements of the CIL Regulations and Planning Practice Guidance. The combination of Local Plan uncertainty, incomplete viability testing, unrealistic assumptions and unresolved questions around future infrastructure responsibilities creates a material risk that the proposed CIL rates will undermine the deliverability of development across Greater Cambridge.

209918	Trinity College, Cambridge (Emma Woods) [132073]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent does not fully agree that the Council has met all regulatory requirements. The evidence base does not satisfy the requirements of Regulation 14 for R&D typologies. The CIL Regulations require that the charging schedule be informed by appropriate evidence and that the Councils have regard to the actual costs of infrastructure and the economic viability of development. The respondent submits that these requirements have not been satisfied in relation to R&D and laboratory development as well as strategic sites because: • The Viability Report does not model the construction costs of specialist R&D and laboratory buildings as a distinct development typology. • The Viability Report does not apply net-to-gross ratios appropriate to laboratory buildings. • The Viability Report does not account for the full cost of emerging Local Plan sustainability policy compliance (net zero carbon and water efficiency) for energy-intensive R&D uses; and • The evidence base does not demonstrate that the proposed commercial rates will not threaten the viability of specialist R&D development (the most economically significant development typology in Greater Cambridge). The respondent respectfully suggests that the Draft Charging Schedule is not ready for submission to examination until a supplementary R&D-specific viability appraisal is undertaken, published and consulted upon.
209802	Urban & Civic (Richard Edwards, Director of		Question 9: Do you agree that the Council has met all		The respondent recognises the energy and effort that has gone into getting to this stage but is concerned that the Council could be exposed to the challenge that it has not met the regulatory requirements in the following material respects.

	Strategic Planning) [132079]		regulatory requirements?		Section 211(7A) of the Planning Act 2008 requires that a charging authority use appropriate available evidence to inform the preparation of a charging schedule. The evidence base as presented is not appropriate because the IS and CIL Supporting Statement are assessed against adopted local plans with a 2031 horizon whilst the Viability Report is assessed against the emerging GCLP. This internal inconsistency means that the infrastructure the CIL seeks to fund and the assumptions upon which it is viability-tested do not correspond.
209606	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No comment.
209596	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No comment
209670	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	It is essential Cambridge City doesn’t miss out on its neighbourhood portion due to the absence of Parish Councils within the city. The neighbourhood portion could help to improve the quality of bus stop infrastructure in the city, and fund improvements around Drummer Street bus station. It would be beneficial if transport advocacy groups, including but not limited to, Camcycle, Cambridge Area Bus Users and Cambridge Living Streets were consulted alongside Residents Associations in Cambridge on how neighbourhood portions should be spent.

209661	Cambridge Group of Ramblers (Jane Crawford-White, Group Chair) [130382]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The Cambridge Ramblers would want to see a percentage of the Neighbourhood Portion ringfenced for improving the PROW network.
209612	Dr Alan Lawrence [131259]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Re. the "neighborhood portion", it is important that Cambridge does not miss out on the 15% neighbourhood portion despite not having Parish councils. Community consultation on how this money should be spent in the area will be vital.
209587	Edward Leigh [132083]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	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 justification for reviving area committees/forums covering the whole of Cambridge, not just areas of new development, as currently.
209646	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Not applicable to Girton Parish Council. All relevant principles relating to parish-level needs and early engagement have been integrated into our answers above.
209632	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Not applicable to Histon & Impington Parish Council. Relevant principles have been addressed within the main submission.
209649	Ms Hannah Brown [9404]		Question 10: Do you have any comments	Comment	Third, I disagree that the proportion for funding for sites neighbouring development areas should be as low as 15%; it

			on how you feel the neighbourhood portion should be distributed?		should be higher. The neighbouring areas to development often experience greater demand on resources- road infrastructure, schooling, plays pace and GP access therefore a greater proportion should be seen to be locally available to those most impacted.
209803	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The respondent comments that in relation to Super Strategic Sites, Section 106 Agreements must ensure that the impacts of development are fully mitigated. In most circumstances, those 'neighbourhood' needs will be all-encompassing and internal to the development, or require specific contribution to off-site services and facilities which may or may not relate to CIL spending priorities. Separate additional contributions towards wider local facilities elsewhere will rarely relate directly to the development in question. In relation to Super Strategic Sites the focus must remain on securing the highest quality of new development and the community facilities directly related to it. This further reinforces the case for continuing reliance on Section 106 Obligations alone in relation to strategic scale development, with neighbourhood priorities addressed through the comprehensive s.106 framework rather than a discretionary CIL allocation mechanism.
209870	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Other comments	Comment	The respondent comments that 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.

209869	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Other comments	Comment	The respondent comments that 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.
209868	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Other comments	Comment	The respondent 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.
209778	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.

209779	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209777	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209780	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209760	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing

					pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209761	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209759	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209762	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the

					extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209876	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209877	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief (‘ECR’) policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209875	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.

209878	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209794	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Other comments	Comment	The respondent notes that no specific CIL policies are proposed aside from that for CIL payment instalments. It is suggested that a policy is published to allow CIL infrastructure payments in kind to be available to allow direct delivery of relevant infrastructure by the developer in accordance with Regulation 73 and 73A of the CIL Regulations. Allowing CIL payment in kind for land for infrastructure and for direct delivery of infrastructure on strategic sites will encourage early infrastructure delivery within schemes, taking into account the relevant cost to developer in doing so.
209793	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Other comments	Comment	The respondent states that, within their infrastructure related remit, the need for collaboration to maximise the effectiveness of this in developing a future infrastructure evidence base that reflects the current and future growth ambitions will be important. This and other circumstances may well justify an early review of the CIL charges to ensure that these and the strategy for applying them are optimised and allow for effective use alongside S106 and other funding streams. In this context, the respondent would be open to exploring the potential for a CIL income sharing agreement in due course. Working together to coordinate and focus funding of infrastructure and achieving its delivery will be an important focus for the respective organisations.

209858	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Other comments	Comment	The respondent comments that consultation is also being undertaken at the same time as the Government's consultation on the proposed Greater Cambridge Development Corporation (GCDC), which runs until 1st April 2026. The GCDC is proposed to be a government-backed body tasked with coordinating, funding, and accelerating large-scale growth across Cambridge and South Cambridgeshire, with a focus on enabling sustainable expansion while addressing infrastructure constraints and housing delivery. Proceeding with the implementation of a local CIL before the GCDC's delivery responsibilities and funding mechanisms are confirmed creates a clear risk of double-charging for infrastructure. The Government has committed an initial £800 million to the GCDC and Oxford Development Corporation specifically to unlock key sites, remove barriers to sustainable growth and accelerate housing delivery. At this stage, it is unknown which elements of strategic infrastructure this funding will subsidise, how it will interact with existing Greater Cambridge Partnership (GCP), or what additional mechanisms the GCDC may introduce to capture land value. In the absence of this clarity, it is not considered appropriate to set CIL Charging Rates, as the Councils cannot yet demonstrate which infrastructure items will be funded by CIL, which will fall to the Development Corporation, and which will remain the responsibility of individual developments. Moreover, the boundary of the Development Corporation is to be resolved. This lack of clarity on other funding, and which parts of Greater Cambridge it will relate to, provides further support for the publication of a CIL Charging Schedule alongside a new Local Plan and clarification of the role, funding and boundary of any Development Corporation.
209859	Cambridge University Hospitals NHS		Other comments	Comment	The respondent comments that it is welcome and essential that, as 'All other uses', developments for the provision of medical or health services are categorised as having a CIL

	Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]				rate of £0. The respondent would wish to reach written agreement that these are zero rated to avoid ambiguity. The respondent has a range of other potential developments which may come forward in the next few years to support its core purpose as a hospital, which may be affected by CIL.
209857	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Other comments	Comment	The respondent comments that the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018 were adopted 8 years ago. It is contended that the introduction of a CIL Levy Charging Schedule now (anticipated in 2027) based on the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018, and with the Greater Cambridge Local Plan due to be submitted for examination this year, risks becoming out of date almost immediately (and likely before any meaningful contributions are collected). If the Councils consider it critical to implement CIL now to provide some additional match funding for City Deal projects, then we would suggest clarity is provided on the process, timescale and scope of any review. Any such review should consider the merits of CIL funding being directed to health and social care investment.
209860	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Other comments	Comment	The respondent comments that the Oxford charging schedule, which in relation to office and R&D space this charging schedule is comparable with, only came in to force in August 2025 and so it is too early to draw any meaningful conclusions in relation to its effect on the delivery of development. The impression given is that the Oxford example was the starting point for identifying an appropriate rate in Cambridge.

209907	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that 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.
209908	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that 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.
209771	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that 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.

209927	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Other comments	Comment	The respondent considers it would be beneficial to the Council to include an Exceptional Circumstances Relief. Whilst it is acknowledged that such a relief can only be used in rare situations, it would not be able to be drawn upon and implemented at all if it is not included as part of the charging schedule. As such it would not cause any detriment to the Council to include it.
209765	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]		Other comments	Comment	The respondent notes that exemption or relief is mentioned in the 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. The respondent recommends that this is added both to the Supporting Statement and the Charging Schedule itself. An example could be where CIL relief would enable the restoration of heritage assets as identified on Historic England's 'Heritage at Risk Register'.
209954	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Other comments	Comment	The respondent comments there must be a reference in the published charging schedule and any supporting guidance that the LPA have the rights to reduce or waive CIL is exceptional circumstance, known as Exceptional Circumstances Relief (ECR) and requests that the Councils do elect for ECR to be allowed, provided that it meets the criteria of the CIL Regulations. This must be referenced in the published charging schedule and any supporting guidance.
209953	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Other comments	Comment	The respondent considers that the Councils should reaffirm in the published charging schedule and any supporting guidance that Reserved Matters Applications are not subject to CIL liability.
209772	Hughes Hall (Melinda Ashton, Bursar's PA and		Other comments	Comment	The respondent comments that it is important that the Charging Authority provides clear and unambiguous guidance on the application of Regulation 43 in respect of charitable relief. Cambridge colleges are long established exempt charities under UK charity law and frequently undertake

	Compliance Administrator) [132053]				development that is integral to their educational and research functions. However, the interpretation of what constitutes “charitable purposes” for CIL relief can vary between charging authorities, creating uncertainty. Earlier consultations on CIL for Cambridge recognised the appropriateness of charitable relief for college development, and we see no reason for this position to change.
209812	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209813	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief (‘ECR’) policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209811	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without

					reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209814	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209815	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent requests that clear and unambiguous guidance on the application of Regulation 43 in respect of charitable relief, with particular regard for the University of Cambridge Colleges is given.
209900	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that 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.
209901	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that 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.
209822	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209823	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209821	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner,	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to

		Planning) [131374]			infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209824	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Other comments	Comment	The respondent requests that the Council exclude the Fitzroy/Burleigh Street/Grafton (FBG) Area of Major Change (AMC) from the CIL Charging Area and apply a £0 per square metre (psm) CIL rate. On the basis of viability, complexity and the existing negotiated Section 106 (S106) contributions package already agreed and directly related to the Grafton Centre Redevelopment project (under Full Planning Permission Ref. 23/02685/FUL), the FBG AMC should be excluded from the Charging Area and have a £0 psm CIL rate.
209884	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209885	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010)

		Planner) [131107]			as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209883	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209886	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209866	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent seeks clarity on the application of Mandatory and Discretionary Charitable Relief under the Community Infrastructure Levy Regulations 2010. As a registered charity, the respondent would ordinarily expect Mandatory Relief to apply where development is used wholly or mainly for its charitable purposes, including the provision of student accommodation for its own students. However, the position is less clear for accommodation developed by the respondent but occupied by students from other Colleges, or where the development forms part of the College's wider investment activities. Given the collegiate structure of Cambridge and the

					way in which Colleges routinely share facilities and accommodation, it is essential that the Councils set out how they intend to interpret the statutory tests. Without this clarity, the financial implications of CIL for the respondent cannot be fully understood.
209892	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209893	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209891	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly

					become outdated or incompatible with future infrastructure delivery priorities.
209894	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209787	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209788	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.

209786	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.