29th March 2026
Greater Cambridge Community Infrastructure Levy Consultation

Sent via email - CIL@greatercambridgeplanning.org

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Dear Sir/Madam,

Greater Cambridge Shared Planning CIL Charging Schedules Consultation - submitted on behalf of a Promoter Consortium.

This representation is submitted by Savills (UK) Limited ("Savills") in respect of the Draft Community Infrastructure Levy ("CIL") Charging Schedules published by Cambridge City Council ("CCC") and South Cambridgeshire District Council ("SCDC"), together operating as Greater Cambridge Shared Planning ("GCSP"). The Draft Charging Schedules have been informed by the Viability Assessment (January 2026) prepared by BNP Paribas Real Estate ("BNP"). Savills writes these representations on behalf of a Promoter Consortium comprising (in alphabetical order):

i. Endurance Estates;
ii. Pigeon.

Hereafter referred to as 'the Consortium'.

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

Purpose

1.1 The Consortium are strategic land promoters responsible for bringing forward high-quality, sustainable development. The Consortium have active land interests across CCC/SCDC, with the combined potential to deliver a significant number of new homes and commercial development within the area. The Consortium also retains a strong appetite to promote further sites within the area. As such, the Consortium is keen to see a balanced and evidence-led CIL rate adopted which supports the delivery of essential infrastructure while ensuring that development remains viable and deliverable.

1.2 The purpose of this representation is to set out our response to the proposed GCSP CIL Charging Schedule and supporting documents, which have been published for consultation from the 16th February 2026 to 29th March 2026.

1.3 The CCC and SCDC Draft Charging Schedules have been informed by the Viability Assessment prepared by BNP Paribas Real Estate in January 2026[1].

1.4 The Consortium is particularly concerned that the Councils are consulting on the Draft Charging Schedule 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 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.

1.5 Proceeding with a CIL consultation before the Greater Cambridge Development Corporation's (GCDC) delivery responsibilities and funding mechanisms are confirmed creates a clear risk of double-charging for infrastructure. The Government has committed an initial £400 million to the GCDC 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 premature to undertake viability testing or 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. Introducing CIL ahead of this certainty risks misalignment, duplication of charges and undermining the viability of strategic sites that the GCDC is intended to support.

1.6 The Consortium is also concerned by the methodology within the BNP Viability Assessment which does not test strategic sites coming forward within the emerging Local Plan.

1.7 In addition, the Consortium wishes to emphasise that it supports the principle that development should contribute towards the delivery of necessary infrastructure. However, the Consortium 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.

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

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

- **Local Plan Uncertainty** – Greater Cambridge is currently preparing a new Local Plan to guide development across Cambridge City and South Cambridgeshire. As the Plan is not yet adopted and strategic site allocations and growth locations remain subject to consultation and examination, there is ongoing uncertainty regarding the scale, distribution, and timing of future development. Introducing CIL rates before strategic sites and growth areas are clearly defined risks misalignment with the emerging Local Plan. The Planning Practice Guidance (PPG) emphasises that viability assessments should reflect planned delivery. Prematurely setting CIL rates may therefore undermine the viability of strategic sites if they do not adequately account for evolving policy requirements, infrastructure expectations, and site-specific constraints. This could therefore necessitate immediate review and amendments to the CIL Charging Schedules to facilitate growth within the Local Plan, creating unnecessary uncertainty and confusion..

- **Incorrect Assumptions** – A number of the key inputs adopted in the Viability Assessment undertaken by BNP are not reflective of the industry standards. In our view, this has led to an overstatement of the viability headroom, thereby supporting CIL rates that may not be realistically achievable across Greater Cambridge.

- **Typologies –** Due to the current status of the emerging Local Plan the Viability Assessment has been unable to effectively test development typologies that are based on the proposed development coming forward and thus strategic sites have not been appropriately tested. This approach falls short of the PPG, which emphasizes that "detailed assessments may be necessary for particular areas or key sites on which delivery of the plan relies[2]."

- **Risk to Affordable Housing** – Affordable housing delivery remains a critical issue in Greater Cambridge, with the Authority Monitoring Report 2024[3] showing that affordability pressures have continued to intensify despite strong overall housing completions. Median house prices now stand at 12.2 times median income in Cambridge and 10.1 times in South Cambridgeshire, reflecting long-term structural affordability challenges. Against this backdrop, the Councils' proposal to introduce CIL at this stage raises significant concerns. The viability of delivering policy-compliant affordable housing is already finely balanced, and the introduction of an additional fixed charge, before the role of the Greater Cambridge Development Corporation and its infrastructure funding responsibilities are confirmed, risks further constraining the ability of strategic sites to deliver affordable homes. Without clarity on which infrastructure items will be funded by CIL, which will fall to Section 106, and which will be delivered or subsidised by the Development Corporation, it is not possible to demonstrate that the proposed CIL rates will not undermine affordable housing delivery.

[2] Planning Policy Guidance, Paragraph: 003 Reference ID: 10-003-20180724
[3] Authority Monitoring Report for Greater Cambridge 2023 - 2024

Proceeding now therefore risks introducing a charging regime that conflicts with the Councils' own evidence of acute affordability pressures and could inadvertently reduce the supply of affordable homes at precisely the moment when delivery needs to increase.

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

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

Overview

1.10 On behalf of the Consortium, Savills write to scrutinise the available evidence, viability testing and the proposed CIL rates. The objective is to ensure that the CIL rates, set out within the draft Charging Schedules, remain reasonable and proportionate, supporting the delivery of sustainable development while accommodating policy requirements for affordable housing, anticipated residual Section 106/278 contributions and necessary site-specific infrastructure.

1.11 We have split our response into the following sections:

- **Part 1 -** The Development Plans and PPG Guidance;
- **Part 2 -** Viability Testing;
- **Part 3** - Interpretation of Results; and
- **Conclusions -** Overview of Key Concerns.

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

Part 1 – The Emerging Local Plan

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

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

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

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

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

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

Applying the Guidance

1.17 The PPG sets out clear requirements for how CIL must be prepared. When assessed against these requirements, the current evidence base shows several areas of non-compliance.

Paragraph Number and Reference ID	Topic	Guidance	Implications for Greater Cambridge
Paragraph: 010 Reference ID: 25-010-20190901 Revision date: 01 09 2019	Rate setting	When deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process. In meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area.	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.
Paragraph: 012 Reference ID: 25-012-20190901 Revision date: 01 09 2019	Facilitate growth and economic benefit	Charging authorities should think strategically in their use of the levy to ensure that key infrastructure priorities are delivered to facilitate growth and the economic benefit of the wider area.	Given the uncertainty of the role of the GCDC, the spatial strategy, infrastructure responsibilities and delivery mechanisms remain unsettled.
Paragraph: 012 Reference ID: 25-012-20190901 Revision date: 01 09 2019	Generally consistent with relevant plan	In relation to the levy, the relevant plan is any strategic policy, including those set out in any spatial development strategy. Charging schedules are not formally part of the relevant plan but charging schedules and relevant plans should inform and be generally consistent with each other.	Given the status of the emerging Local Plan the Charging Schedule cannot yet be shown to be "generally consistent" with the relevant plan.

Paragraph: 017 Reference ID: 25-017-20190901 Revision date: 01 09 2019	Spending	Charging authorities must identify the total cost of infrastructure they wish to fund wholly or partly through the levy. In doing so, they must consider what additional infrastructure is needed in their area to support development, and what other sources of funding are available, based on appropriate evidence. Information on the charging authority area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken when preparing the relevant plan (the Local Plan) and their CIL charging schedules. This is because the plan identifies the scale and type of infrastructure needed to deliver the area's local development and growth needs. From December 2020, local authorities must publish an infrastructure funding statement, and information should be drawn from this. The infrastructure funding statement should identify infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions, and the choices the authority has made about how these contributions will be used.	Reliance must therefore be had on infrastructure evidence and viability evidence, with reasoned consideration of the views of the key stakeholders and delivery agents.
Paragraph: 019 Reference ID: 25-019-20190901 Revision date: 01 09 2019	Viability assessment	A charging authority should be able to explain how their proposed levy rate or rates will contribute towards new infrastructure to support development across their area. Charging authorities will need to	The viability inputs and assumptions in the testing of the generic site typologies must though be realistic and reasonable.

		summarise their viability assessment. Viability assessments should be proportionate, simple, transparent and publicly available in accordance with the viability guidance.	
Paragraph: 021 Reference ID: 25-021-20190901 Revision date: 01 09 2019	Viability Assessment, costs and planning obligations	A charging authority should take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land. A realistic understanding of costs is essential to the proper assessment of viability in an area. Assessment of costs should be based on evidence which is reflective of local market conditions in accordance with planning practice guidance on viability. Development costs include costs arising from existing regulatory requirements, and any policies on planning obligations in the relevant plan, such as policies on affordable housing and identified site-specific requirements for strategic sites.	The Supplementary Planning Documents impose substantial infrastructure, open space, biodiversity and land-take requirements, particularly for large edge-of-settlement sites. These costs must be reflected in the viability evidence, but are not adequately captured in the current typologies.
Paragraph: 022 Reference ID: 25-022-20190901 Revision date: 01 09 2019	Differential rates	Charging authorities should consider how they could use differential rates to optimise the funding they can receive through the levy. Differences in rates need to be justified by reference to the viability of development. Differential rates should not be used as a means to deliver policy objectives. A charging authority that plans to set differential rates should seek to avoid undue complexity. Charging schedules with differential rates	The flat £60/m² rate does not reflect the materially different viability characteristics of the different areas of Greater Cambridge.

		should not have a disproportionate impact on particular sectors or specialist forms of development. Charging authorities may wish to consider how any differential rates appropriately reflect the viability of the size, type and tenure of housing needed for different groups in the community, including accessible and adaptable housing, as set out in the National Planning Policy Framework. Charging authorities should consider the views of developers at an early stage.	
Paragraph: 040 Reference ID: 25-040-20190901 Revision date: 01 09 2019	Examination	The examiner must report their recommendations to the charging authority in writing. The examiner may recommend that the draft charging schedule should be approved, rejected, or approved with specified modifications. In approving the draft Charing Schedule the examiner should establish that: • the charging authority has complied with the legislative requirements set out in the Planning Act 2008 and the Community Infrastructure Levy Regulations (as amended); • the draft charging schedule is supported by background documents containing appropriate available evidence; • the charging authority has undertaken an appropriate level of consultation; • the proposed rate or rates are informed by, and consistent with, the evidence on viability	The Charging Schedule must be backed by a transparent, up-to-date viability assessment, infrastructure delivery plans, and local housing market data. Weak or unconvincing evidence can lead to rejection or required modifications. CIL rates must not undermine the Local Plan.

		across the charging authority's area; and • evidence has been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see National Planning Policy Framework paragraph 34).	
Paragraph: 166 Reference ID: 25-166-20190901 Revision date: 01 09 2019	Developer contributions, highways agreements and CIL	Developers may be asked to provide contributions for infrastructure in several ways. This may be by way of the Community Infrastructure Levy, planning obligations in the form of S106 agreements (see National Planning Policy Guidance on planning obligations), and section 278 highway agreements (under section 278 of the Highways Act 1980 as amended). Developers will also have to comply with any conditions attached to their planning permission (see National Planning Policy Guidance on planning conditions). Local authorities should ensure that the combined total impact of such requests does not undermine the deliverability of the plan (see paragraph 34 of the National Planning Policy Framework for details). Where the levy is in place for an area, charging authorities should work proactively with developers to ensure they are clear about the authorities' infrastructure needs.	The costs of S106 is relevant consideration for the viability evidence. In addition the cost of S278 infrastructure is a relevant consideration for the viability evidence.

		Authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in their infrastructure funding statements which infrastructure they expect to fund through the levy.	

Part 2 – The Viability Testing

1.18 BNP were appointed by Greater Cambridge Shared Planning ('GCSP') to provide a Viability Assessment to test the ability of developments in Greater Cambridge to accommodate contributions towards the infrastructure through the implementation of CIL alongside policies in the emerging Local Plan. There are a number of concerns with respect to the assumptions adopted.

1.19 We would like to highlight the following points and seek further clarification in regard to the justification for adopting a number of the assumptions included within the Viability Assessment.

<u>Typologies</u>

1.20 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.

1.21 In line with the PPG (Paragraph: 005 Reference ID: 10-005-20180724), 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.

1.22 The residential typologies tested by BNP assume a gross-to-net developable area of 100% for 11 typologies. This is wholly inconsistent with the policy requirements of the emerging Greater Cambridge Local Plan. Policies relating to biodiversity net gain, open space, green infrastructure, movement and transport corridors, community facilities, and integrated water management all require substantial land-take that must be delivered on-site. Strategic sites in Greater Cambridge typically achieve net developable areas of 40–65% once these policy burdens are applied. A 100% net assumption is therefore undeliverable in practice and materially overstates viability. The typologies do not reflect policy-compliant development and cannot be relied upon to justify the proposed CIL rates.

1.23 A further concern is BNP's decision to apply a uniform average private unit size of 97 sq m (1,045 sq ft) across all residential typologies, including those that are 100% apartment-led. This assumption is not credible and does not reflect either market reality or the policy framework set out in the emerging Greater Cambridge Local Plan. Apartment schemes, particularly those in higher-density locations, typically deliver a mix of 1- and 2-bed units with significantly smaller average sizes, often in the range of 50–75 sq m. Applying a suburban family-housing average to flatted typologies materially inflates GDV and artificially improves viability outcomes.

1.24 BNP's density assumptions applied across the typologies are undeliverable in practice. For the housing-led typologies, BNP model net densities ranging from 20 to 150 dwellings per hectare, yet these densities are then applied to 100% net developable areas, which is fundamentally inconsistent with the spatial, environmental and design policies in the emerging Greater Cambridge Local Plan. The most extreme example is the assumption that almost 7,000 houses and 367 flats could be delivered on just 48 net hectares (150 dph), all at an average private unit size of 97 sqm. This bears no resemblance to any deliverable development form in Greater Cambridge. To illustrate the scale of the issue, applying the assumed average unit size to the houses alone generates approximately 679,000 sqm of residential floorspace, which equates to 33.95 hectares of land (assuming 2 storeys) before accounting for streets, open space, SuDS, BNG land, schools, community facilities or green infrastructure. In other words, the floorspace requirement for the houses alone exceeds the entire net developable area assumed for the typology.

1.25 BNP's densities implied by their assumptions are not only unrealistic but physically impossible to deliver in a policy-compliant masterplan. The combination of inflated net developable areas, uniform unit sizes and extreme density assumptions materially overstates viability and cannot be relied upon as evidence to support the proposed CIL rates.

1.26 We recommend that BNP remodel all of the typologies assuming realistic inputs and densities of development comparable to schemes in Greater Cambridge. We recommend the following densities as suggested within the Greater Cambridge HELAA[4]:

- 30–40 dph in outer residential parcels
- 40–55 dph around local centres and primary streets
- 60–80 dph where flatted development is introduced

[4] Greater Cambridge HELAA (2021) Appendix 5: Greater Cambridge Site Typologies and Capacity Study, 2021

<u>Residential Sales Values</u>

1.27 BNP acknowledge the wide variation in residential values across Greater Cambridge, citing a range of £371.61–£836.12/sq ft. This range broadly reflects proximity to Cambridge city centre, with more rural locations generally achieving lower average values. The Consortium agrees with this general trend; however, we are concerned that the upper end of the range appears overstated, and BNP provides no clarity on the underlying sales evidence. The comparables appear to rely on second-hand transactions, which are not an appropriate basis for determining a CIL rate intended to apply to new-build development. It is also unclear when these transactions occurred, making it difficult to assess their relevance to current market conditions.

1.28 Drawing on our local market knowledge, we have a clear understanding of the GDVs being achieved on current new-build schemes across Cambridge and have included the accompanying map illustrating average achieved values. It is not evident which comparables BNP have used to justify the upper end of the range at £836.12/sq ft, but it is likely that this reflects second-hand stock rather than new-build evidence.

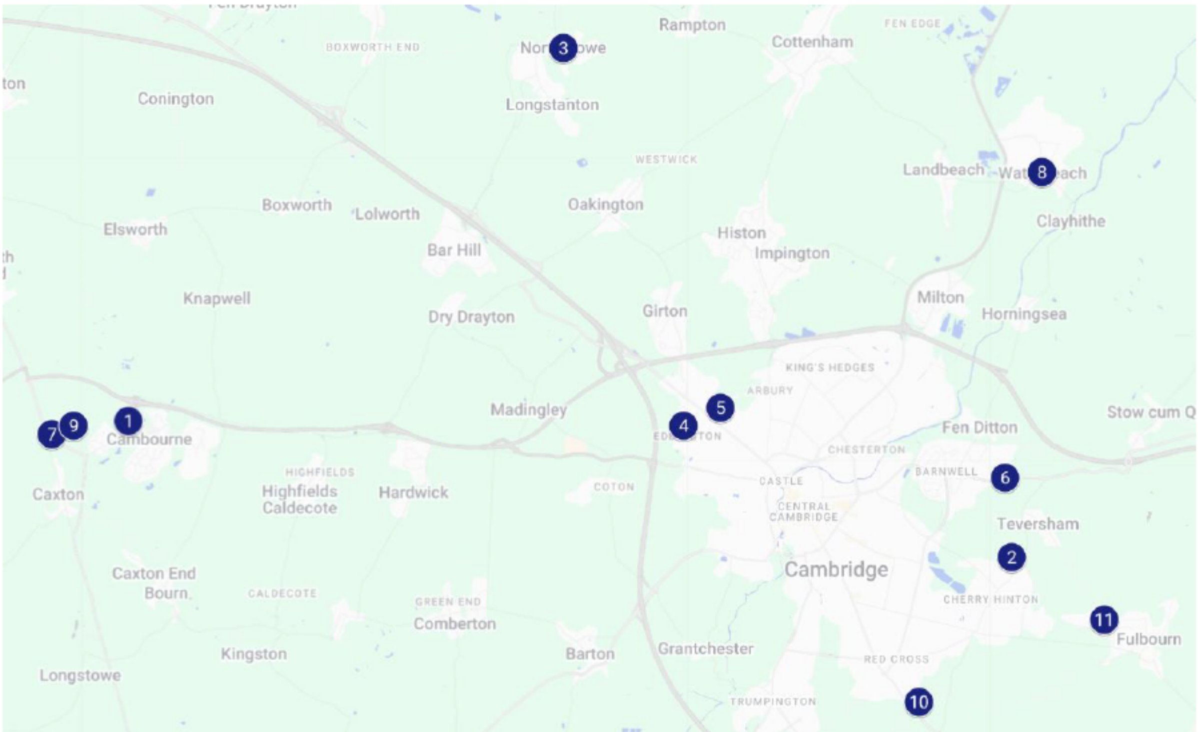

Table 1: New Build Sales Evidence

No.	Scheme	Unit Numbers	Average £/SqFt	Developer
1	Chivers Rise	286	£401	Taylor Wimpey
2	Springstead Village	1,200	£537	Bellway
3	Northstowe	10,000	£360	Vistry/TW/BDW/Keepmoat

4	Eddington	3,000	£516	Hill
5	Darwin Green	2,700	£515	BDW
6	Marleigh	1,300	£490	Hill
7	Lunar Park	200	£356	Bovis
8	Waterbeach	8,000	£415	Stonebond/ Cala
9	Burghley Green	120	£409	Taylor Wimpey
10	Netherhall Gardens	200	£538	Cala
11	Farehurst Park (Asking Prices)	110	£526	Hill

1.29 As can be seen from Table 1, we have collated new build sales evidence from the main new build schemes around the city and on the outskirts from 2024 and 2025. This dataset demonstrates a value range of £356–£538/sq ft, reflecting actual achieved values on current schemes being delivered by the major housebuilders.

1.30 On this basis, we request that BNP update their residential sales value assumptions to align with the evidence above. The values currently adopted appear elevated relative to market reality and risk overstating scheme viability. It would be helpful to understand which Cambridge city-centre comparables support an average value of £836.12/sq ft, and whether these are genuinely representative of new-build schemes coming forward rather than second-hand stock.

1.31 It is also essential that the evidence underpinning BNP's Viability Assessment is transparent, current and clearly sourced. Without clarity on the comparables used, it is not possible to verify whether the adopted values reflect new-build stock, appropriate transaction dates, or the specific characteristics of the Greater Cambridge market.

1.32 This point is particularly relevant in the context of current market conditions in Cambridge. Our Savills New Homes team is reporting markedly slower absorption rates across both houses and apartments, with developers now routinely offering incentives of at least 5% to stimulate sales. This is reflective of the wider new build housing market with housebuilders increasingly using price cuts and incentives to boost sales. In November 2025, the NHBC site sentiment survey showed a positive net balance of 24, reporting higher use of incentives, and a majority reported no increases in prices. Smaller housebuilders typically lack the financial capacity for sustained price cuts or heavy use of incentives, and are struggling with lower sales rates as a result[5].

1.33 Given the slowdown in absorption rates, increased reliance on incentives, and the broader softening of the new-build market, it is essential that the Viability Assessment reflects accurate, current and

[5] Savills English Housing Supply Q4 2025, February 2026

appropriately evidenced GDVs. Without this recalibration, the assessment risks overstating scheme viability and undermining the robustness of the proposed CIL rate.

Rents and Yields for Commercial Development

Office / R&D

1.34 The rents adopted by BNP for offices at £615/sqm (£57/sq ft) are overstated. Those rents may be achievable in prime locations such as by the train station but they are not achievable elsewhere. The below plan highlights some of the recently achieved rental prices for offices in Cambridge in 2024 and 2025. Those offices of the highest specification and located closest to the station achieve a premium and have historically achieved rents c. £60/sq ft, however, these rents very quickly drop off with distance from this location. A differentiated approach, reflecting the well-established gradient in Cambridge office rents, would provide a more accurate and robust basis for viability testing.

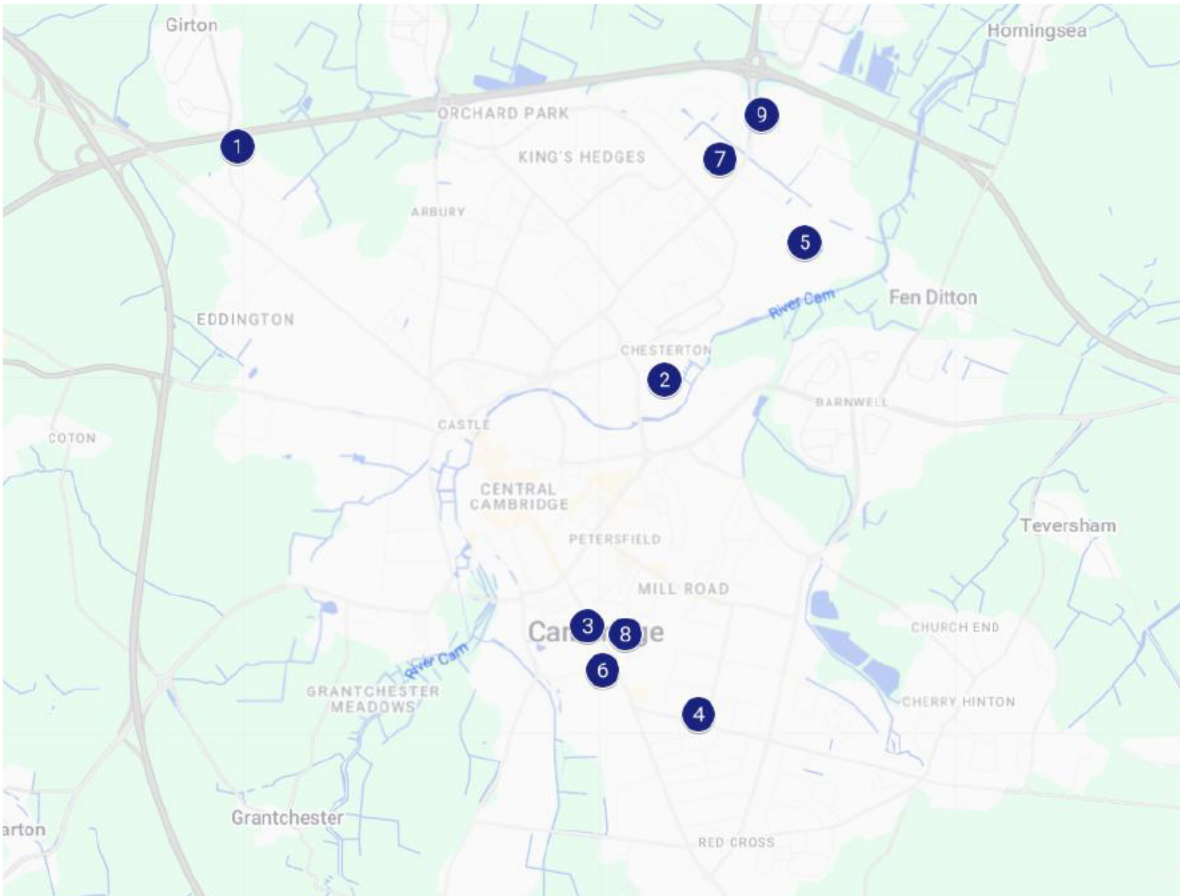

Table 2: Office Rents Achieved in Cambridge in 2024/25

No.	Address	Sq Ft	Rent (psf)	Date

1	Wellbrook Court	40,294	£23.82	Q4 2024
2	Radio House	85,488	£21.48	Q4 2024
3	Bateman House	2,678	£42.50	Q2 2025
4	Old Swiss	3,410	£50.00	Q2 2025
5	One Cambridge Square	2,550	£45.63	Q3 2025
6	Brooklands	1,700	£62.50	Q2 2025
7	22 Cambridge Science Park Rd	21,240	£40.00	Q3 2025
8	21 Station Road	12,000	£65.00	Q4 2025
9	Maurice Wilkes Building	7,642	£35.00	Q4 2025

1.35 BNP's own commentary on Benchmark Land Values (BLVs) states that office rents within the District range from £6.64 to £22.94/sq ft at 4.38. While the £6.64–£22.94/sq ft range appears low relative to recent market evidence, the contrast highlights a clear inconsistency between the rental values used to inform BLVs and those applied in the viability testing (£57/sq ft). This inconsistency materially inflates development values and overstates the viability headroom available to support the proposed CIL rates.

1.36 BNP's Viability Assessment has not differentiated rents and yields for R&D and offices. R&D space typically commands higher rents and sharper yields than conventional offices because it serves a specialist occupier base, often with strong covenant strength and bespoke requirements. Offices operate in a broader but more price-sensitive market, and using blended assumptions masks these differences. It effectively attributes R&D-level values to office space that would not achieve them in practice, thereby overstating the viability of office development.

1.37 BNP recognised this in their own Viability Assessment[6] undertaken in December 2025 for Oxford City Council, applying separate rents and yields for offices and R&D to ensure their evidence base reflected real market behaviour. We consider it important that BNP adopts the same approach for Greater Cambridge to ensure the assessment is robust, transparent and aligned with established best practice.

1.38 Specifically looking at the yields adopted by BNP, we would comment that a yield of 6% for offices is not reflective of the market. Savills UK Commercial Research suggests offices should reflect 7.5%[7].

Industrial / Warehousing

1.39 The industrial and warehousing rents adopted by BNP in their Viability Assessment, £195/sqm (£18.12/sq ft), are achievable in parts of Cambridge but are not representative of values across the

[6] Oxford City Council: Local Plan Viability Assessment Update, December 2025

[7] Savills Market in Minutes: UK Commercial, December 2025

wider Greater Cambridge area. Recent 2025 lettings evidence, illustrated in the comparables map provided, shows materially lower rents being achieved in many locations outside the city. Applying a single headline rent therefore risks overstating development values and inflating viability in areas where market performance is demonstrably weaker. A more robust approach would be for BNP to adopt a phased or zonal rent structure, distinguishing between Cambridge city and the wider market area, to ensure the assessment reflects genuine local market variation.

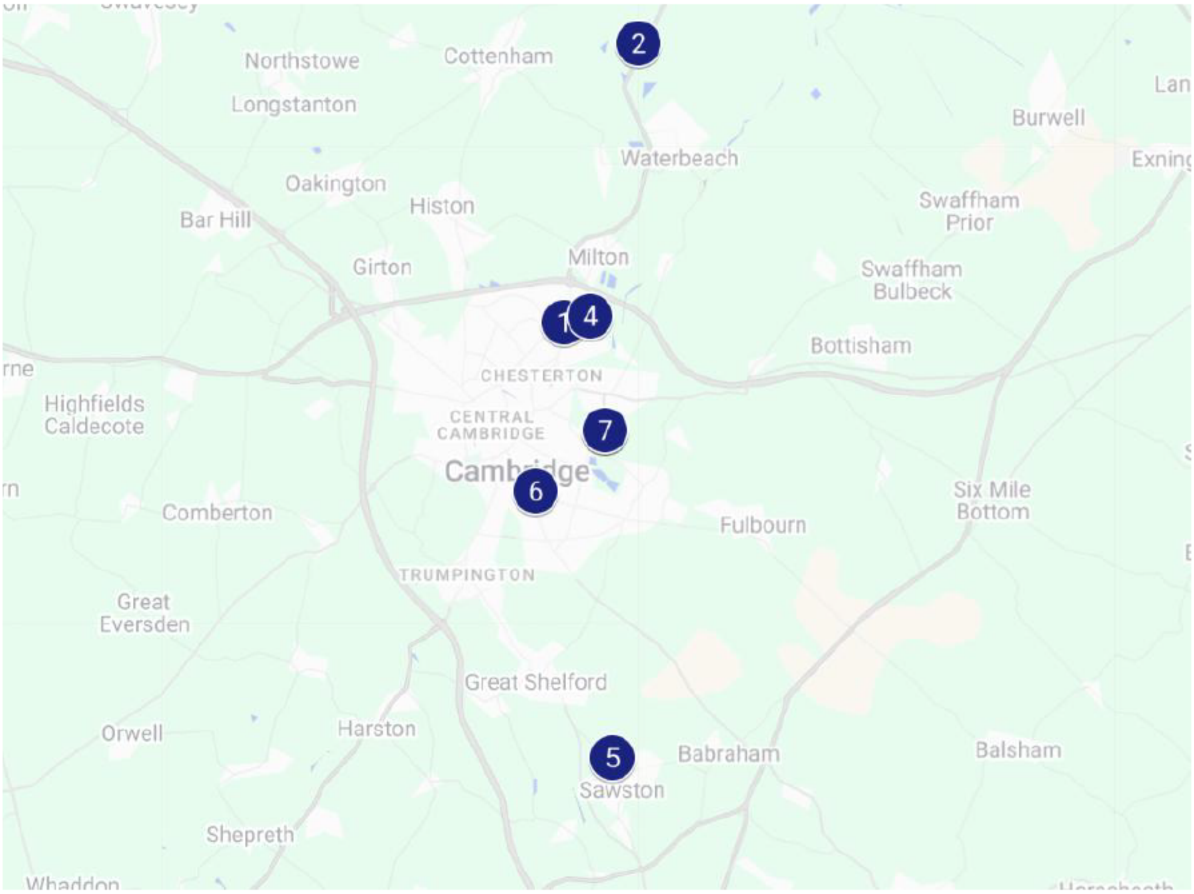

Table 3: Comparable rental values for Industrial

No.	Address	Sq Ft	Rent (psf)	Date
1	Trinity Hall Farm Industrial Estate	3,192	£7.00	Q2 2025
2	Glenmore Business Park	1,107	£11.74	Q3 2025
3	91-92 Cowley Road	3,326	£12.03	Q4 2025
4	3A Deal Business Park	1,714	£11.50	Q2 2025
5	Unit 46 Clifton Road	2,104	£18.50	Q4 2024
6	Unit 2, 253 Barnwell Road	2,450	£22.00	Q3 2025

1.40 We would comment that the yield for industrial is also too low and should reflect 5.25%.

Recommendation

1.41 The Viability Assessment already recognises this spatial variation in relation to retail, distinguishing between city-centre and "elsewhere" rents. A comparable approach should be applied to office (and, where relevant, industrial) floorspace to ensure the appraisal reflects real market conditions. This would align with established practice in other authorities, such as Birmingham City Council[8], where prime and secondary commercial markets are distinguished within viability evidence to avoid overstating viability in weaker locations or understating it in prime areas.

1.42 The Consortium 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 as demonstrated by the comparable evidence included in Table 2 and 3.

1.43 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.

Build Costs

1.44 The Consortium have significant concerns in respect of the build costs which have been adopted within the Viability Assessment. A flat rate has been applied across Greater Cambridge. No information has been included to suggest what whether the median has been adopted or where the build costs are rebased to. The costs adopted reflect £1,608/sqm for houses and £1,858/sqm for flats, £2,211/sqm for retail, £2,555/sqm for offices and £978/sqm for industrial and warehousing.

1.45 Although the PPG (Paragraph: 10-012-20180724) recommends the use of BCIS data for assessing build costs, we recognise several inherent limitations with this approach. The BCIS dataset is based on a relatively small sample size and does not account for the specific characteristics of individual development sites. Applying a single build cost for all houses or all flats is overly simplistic and does not reflect the complexity of real-world development. For instance, the construction costs for flats can vary significantly depending on building height. Multi-storey apartment blocks typically incur higher costs than low-rise schemes. Additionally, build costs are closely tied to economies of scale: smaller

[8] Birmingham Community Infrastructure Levy Viability Review, August 2020 (reissued March 2022)

developments tend to be more expensive on a per-unit basis compared to larger schemes due to less efficient procurement and delivery processes.

1.46 It is essential that the base build costs being modelled are correct to ensure that there is not a significant underestimation of the true costs of development. A number of the other assumptions adopted (contingency, externals and professional fees) are based upon the base build costs, therefore a number of cost elements could be vastly underestimating the true costs of delivery.

1.47 The build costs adopted are materially below the levels we are seeing housebuilders achieve in practice, particularly among Small and Medium-Sized Enterprises (SMEs), who continue to face tighter margins, higher finance costs, and reduced buying power in the supply chain. This sits against a wider backdrop of sustained construction inflation. BCIS' latest five-year forecast (4Q2025–4Q2030) projects building costs to rise by around 15%, with tender prices expected to increase by approximately 16–17% over the same period. These pressures indicate that current cost allowances are unlikely to be deliverable and understate the true cost environment facing developers.

1.48 For larger edge-of-settlement schemes, an additional allowance of £29,070 per unit has been applied for 'utilities upgrades, estate roads and other related infrastructure', derived from the Local Housing Delivery Group Viability Testing Local Plans guidance and subsequently indexed.

1.49 It is unclear precisely what this allowance is intended to cover, but at this level it is unlikely to be sufficient for site-wide enabling works. Edge-of-settlement schemes typically require substantial investment in primary infrastructure, such as spine roads, utilities reinforcement, drainage networks, attenuation, off-site highway mitigation, and strategic green/blue infrastructure, which routinely exceed this level of provision. On comparable strategic and urban-extension schemes, infrastructure allowances are significantly higher, reflecting the scale and complexity of upfront works required to unlock development.

Externals

1.50 The Viability Assessment adopts a flat-rate assumption of 15% of BCIS build costs to account for external works associated with infrastructure and services.

1.51 Applying the same external allowance across all development typologies fails to reflect industry practice. It is widely recognised that larger, strategic-scale developments incur significantly higher external costs due to the scale and complexity of their infrastructure requirements. As such, applying a flat percentage to all schemes risks underrepresenting the true cost profile of strategic sites.

1.52 Strategic sites, due to their scale and policy expectations, are expected to deliver a wider range of physical and social infrastructure, typically secured through Section 106 or Section 278 agreements. These infrastructure items are essential to unlocking large-scale development and typically include:

- **Roads** - junction upgrades and new road links;
- **Transport** - enhanced public transport infrastructure or subsidies;
- **Schools** - land and capital contributions for new schools;
- **Healthcare** - GP surgery provision; and
- **Community infrastructure** - libraries, open space, and local centres.

1.53 The PPG (Paragraph 25-021-2019090) states that “a Charging Authority should take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites”. This guidance directly acknowledges that strategic-scale development faces disproportionate cost burdens compared to smaller development and should be treated accordingly.

1.54 This principle has been accepted by neighbouring Local Authorities to include East Suffolk Council (‘ESC’) who within their Viability Assessment[9] adopted a different approach, applying a higher external works allowance of 20% for strategic sites, compared to 15% for smaller schemes to reflect the additional infrastructure demands associated with strategic growth.

<u>Section 106</u>

1.55 The Viability Assessment applies a Section 106 allowance of £25,000 per residential unit (£25/sqm for non-residential development), rising to £46,000 per unit for strategic allocations. Under national guidance, the introduction of CIL should ordinarily result in a material reduction in Section 106 obligations, with CIL funding the majority of strategic infrastructure and Section 106 reserved for site-specific mitigation.

1.56 The approach proposed for Greater Cambridge diverges significantly from this principle. The Councils have confirmed 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.

1.57 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

[9] East Suffolk CIL Charging Schedule Examination Document Library: A8 Aspinall Verdi CIL Review June 2022

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.

1.58 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.

1.59 We recommend 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. This approach is widely adopted elsewhere. For example, at Peterborough City Council the CIL examiner concluded that applying CIL to large sites would undermine viability; consequently, residential developments of 500 dwellings or more are expressly nil-rated to ensure that strategic infrastructure can be delivered through Section 106 rather than CIL. A similar position has been taken by Dacorum Borough Council, which identified that several large "Identified Sites" would need to deliver substantial strategic infrastructure directly. These sites were therefore treated as nil-rated, as requiring them to fund additional infrastructure through CIL would have created a disproportionate burden.

Development and Sales Rates

1.60 BNP have adopted a sales period based on the assumption of 6 units per month. The Consortium is concerned that this is not reflective of the current market with it widely suggested in the media that sales rates have been negatively impacted in the last year.

1.61 Savills Research[10] confirms that the new build market faces serious challenges from the lack of buyer demand. Low sales rates among housebuilders are raising concerns for housing delivery. In the absence of a demand-side stimulus, sales rates reported by the major housebuilders across the country have plateaued at 0.6 sales per outlet per week in the first 6 months of 2025.

1.62 Recent months' data suggest sales rates may have softened slightly. Three housebuilders issued updates covering July to November 2025. Taylor Wimpey reported sales rates of 0.61, down from 0.68 the year before. Persimmon reported 0.63, slightly higher than 0.61 at the end of 2024. Crest reported full-year results of 0.51, also slightly higher than 0.48 across 2024.

[10] Savills: English Housing Supply Update Q4 2025, February 2026

1.63 The sales absorption assumed by BNP sits well above what is being achieved in practice, given the reliance on discounts and incentives to secure reservations. On this basis, it is reasonable to request that BNP revisit and moderate their assumed sales rates so that they more accurately reflect prevailing market dynamics and the level of demand evidenced across comparable schemes.

Site Abnormals (Exceptional Costs)

1.64 Abnormal costs within the Viability Assessment represent the additional development expenditure that can arise on both brownfield and greenfield sites. BNP have confirmed that, in the absence of detailed site investigations, it is not possible to produce a reliable estimate of these costs. On this basis, no allowance has been included, with BNP expressing concern that a blanket assumption could distort results.

1.65 The Consortium's position is that excluding abnormal costs entirely is equally misleading. All major development sites incur some level of abnormal expenditure, and omitting these costs risks overstating viability and presenting an unrealistic picture of deliverability. A more appropriate approach would be to establish a realistic allowance through early dialogue with developers and promoters bringing sites forward in Greater Cambridge. Incorporating this evidence, rather than assuming abnormal costs are zero, would produce a more transparent and credible viability baseline and avoid overstating deliverability. This is supported by the PPG (Paragraph:10-011-20180724), where is states that 'any viability assessment should be supported by appropriate available evidence informed by engagement with developers'.

1.66 The PPG (Paragraph: 10-013-20240214) is explicit that viability assessments must be based on "standardised inputs" and "evidence of costs and values that reflect local market conditions". It also states that 'abnormal costs, including those associated with treatment for contaminated sites, or costs associated with brownfield, phased or complex sites should be taken into account when defining benchmark land value'.

1.67 These requirements make clear that viability testing should not ignore known categories of cost simply because site-specific data is incomplete. Instead, it should adopt reasonable, evidence-based assumptions that reflect typical conditions in the local market.

1.68 Other CIL Viability Assessments have adopted a different approach to BNP where an allowance has been included within the testing to include Babergh and Mid Suffolk District Council's CIL Viability

Assessment prepared by Urba[11] where an allowance of £110,000 per acre was included for abnormal costs.

1.69 Abnormal costs are particularly acute on strategic sites and they are typically front-loaded in the delivery process, often long before any development income is realised. It is important to note that BCIS construction cost data, which underpins much of the Viability Assessment, only reflects standard construction elements (substructure, superstructure, preliminaries). It does not include exceptional or site-specific abnormal costs. Therefore, it is incorrect to assume that the Viability Assessment's standard build cost metrics already capture these burdens. Without explicit abnormal cost allowances for strategic sites, the assessment risks substantially overestimating residual land values and development viability.

1.70 Failure to account for these substantial and distinct abnormal costs results in a viability assessment that does not reflect real-world development economics.

Developer's Profit

1.71 BNP have adopted a profit of 17.5% on Gross Development Value (GDV) for private and 6% on GDV for affordable, which reflects a blended rate ranging from 12.9% on GDV based on the 40% affordable housing policy provision. The minimum profit margin that the lending institutions are currently prepared to accept, on residential development, is a blended rate of at least 20% on GDV blended across both private and affordable tenures. This is also reinforced by the PPG (Paragraph:10-019-20190509).

Benchmark Land Values ('BLV')

1.72 BNP have suggested that 'much of the land coming forward for development in Greater Cambridge will be greenfield which has a low existing use value' of £20,000-£23,000 per gross hectare, £8,095 - £9,305 per gross acre. In our view, this position materially understates prevailing agricultural land values in the area and is not supported by current market evidence which is further reinforced by the fact that BNP have not provided any comparable agricultural transactions to support these EUVs within the Viability Assessment.

1.73 By way of context, the Royal Institution of Chartered Surveyors (RICS) and the Royal Agricultural University publish a biannual Farmland Market Directory of Land Sales, which provides transaction-based evidence of agricultural land values. The most recent report (January–June 2025) indicates an

[11] CIL Viability & affordable housing commuted sum calculation study, Urba, November 2024

average value of £57,079 per hectare for transactions in the East of England, as set out in the table below. This benchmark is substantially above the range assumed by BNP.

Table 4: Weighted Sample Average Prices by Location and Size

Weighted Sample	Small <50 ac		Medium 50-200 ac		Large > 200 ac	
	£/ac	£/ha	£/ac	£/ha	£/ac	£/ha
East	23,100	57,079	23,100	57,079	9,970	24,635
East Midlands	16,744	41,375	11,713	28,944		
North East	13,885	34,309	8,779	21,693		
North West	10,503	25,953	12,919	31,923		
South East	15,528	38,370				
South West	13,950	34,471	11,729	28,983	10,817	26,728
West Midlands	23,395	57,810	10,786	26,652		
Yorks and Humber	16,330	40,351	9,750	24,092	6,073	15,005
England Overall	**14,578**	**36,023**	**11,564**	**28,575**	**8,864**	**21,902**
Wales	17,208	42,522	14,655	36,213		
Scotland	36,976	91,368	7,603.48	18,788		
GB Overall	**15,231**	**37,637**	**11,767**	**29,076**	**8,864**	**21,902**

1.74 The figures referenced above relate to small and medium-sized sites. However, even when allowing for the potential value differential associated with larger sites, it is considered that BNP's proposed Existing Use Values (EUVs) remain understated when assessed against the evidence presented in Table 4. Furthermore, as the figures in Table 4 represent regional averages for the East of England, it is reasonable to conclude that values within Greater Cambridge would sit at the upper end of that range, reflecting the area's strong market fundamentals and land demand.

1.75 To further enforce the above point, we include some recent comparable evidence for agricultural land in Greater Cambridge:

savills

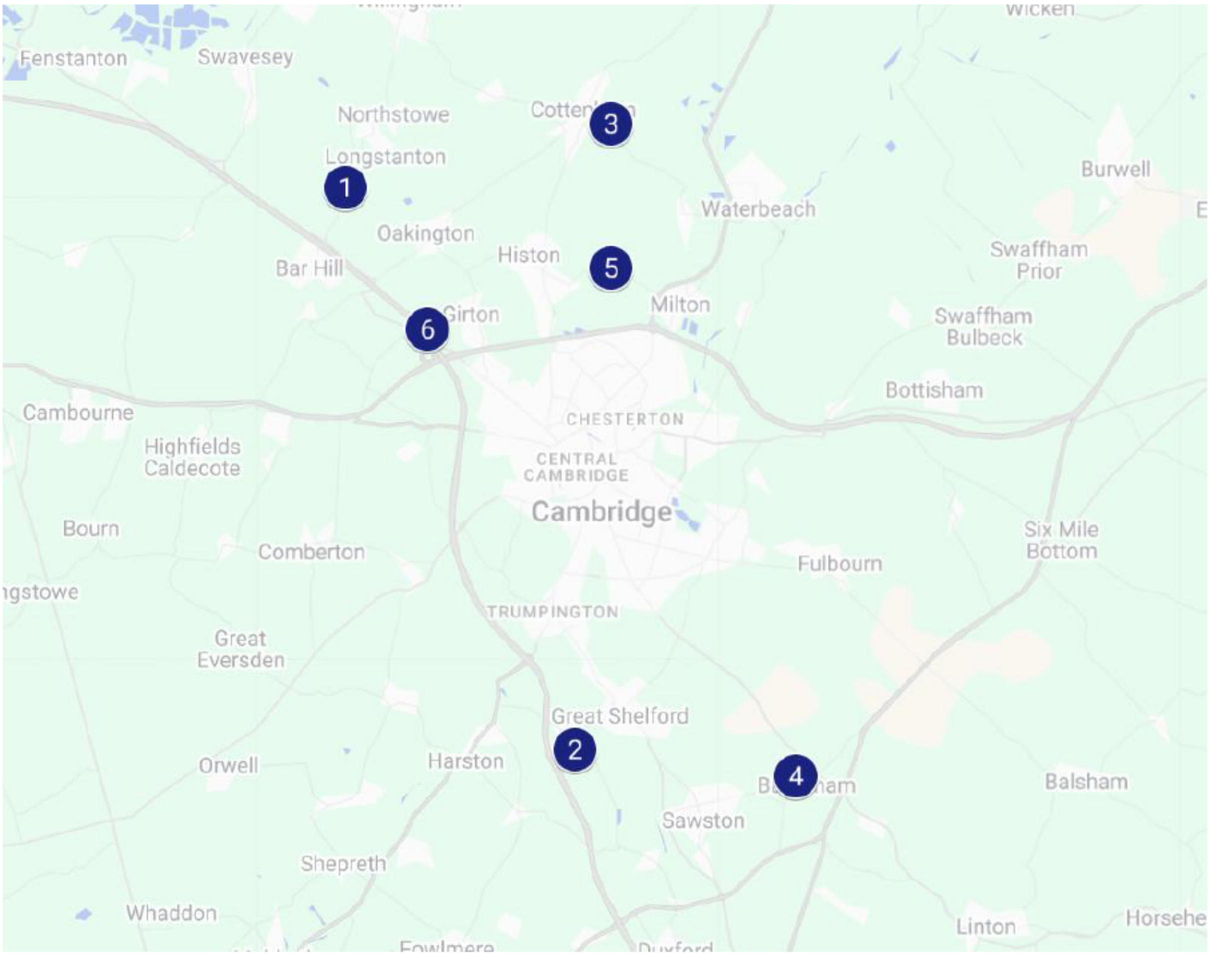

Table 5: Agricultural Comparable Evidence

No.	Address	Acres	£	£/Ha	£/Acre	Date
1	Bar Farm Longstanton	199	£3,250,000	£40,404	£16,351	2025
2	Hall & Rectory Farm Little Shelford	586	£10,000,000	£42,174	£17,068	2024
3	Steeple Chase Farm Cottenham	179	£2,300,000	£31,683	£12,822	2024
4	Babraham Estate	1,515	£27,515,000	£44,878	£18,162	2018
5	Manor Farm Impington	370	£8,575,796	£57,217	£23,155	2024
6	Grange Farm Girton	162	£3,626,120	£55,344	£22,397	2023

1.76 The comparable evidence in Table 5 demonstrates that agricultural land values across Greater Cambridge are materially higher than the £8,095–£9,305 per gross acre adopted by BNP. The strongest comparables, those closest to Cambridge, achieve £22,000–£23,000 per gross acre, reflecting the premium associated with proximity to the city and the competitive market for edge-of-Cambridge land. Values then soften with distance, but even the lower-value transactions significantly exceed BNP's assumptions. This evidence aligns more closely to the Farmland Market Directory of Land Sales. This indicates that the current inputs understate realistic land values and risk distorting the viability conclusions.

1.77 BNP apply a BLV of £250,000 to £370,000 per gross hectare, a multiplier of 12.5–18.5 times agricultural land value. This ratio only holds if agricultural existing use value (EUV) is assumed at £20,000 per hectare. If BNP's own upper figure of £23,000 per hectare is used, the same BLV range instead equates to a lower multiplier of 10.9–16.1 times EUV. For greenfield land, premiums are typically in the region of 15–20 times agricultural value, reflecting the level generally required to incentivise land release. Even at this higher premium, the EUV assumed by BNP remains materially below typical agricultural land values in Cambridgeshire, meaning the BLVs adopted are anchored to an artificially low starting point and therefore understate realistic landowner expectations.

1.78 Re-modelling the BLVs using a more realistic EUV, such as £49,420 per gross hectare (equivalent to £20,000 per gross acre) which aligns with the comparable evidence and applying a premium of 15–20 times, would generate BLVs in the order of £741,300–£988,400 per gross hectare. This range more accurately reflects market evidence such as Minimum Land Values to bring greenfield land forward in Greater Cambridge.

Retail

1.79 The consortium question whether the same charging rate should be applied to retail and supermarkets over a certain size.

Retirement Housing

1.80 The Consortium is concerned that Retirement Housing has been assessed as sufficiently viable to accommodate a CIL charge. The proposed rate of £60 per square metre mirrors the rate applied to standard residential houses and flats, despite the markedly different cost and operational characteristics of retirement accommodation.

1.81 It is unclear from the Viability Assessment what build cost assumptions have been applied when testing Typology 8 - the only typology representing retirement housing. BNP has not provided a specific build cost allowance for Retirement Housing, and it appears, though this is not explicitly stated, that the same costs used for C3 housing have been applied. Given the higher specification, enhanced communal areas, and additional construction requirements associated with retirement schemes, adopting standard C3 build costs would materially underestimate true development costs and overstate scheme viability. The operational residential sector has felt these pressures acutely, with schemes typically delivered with complex communal and servicing requirements and enhanced building safety regulations[12].

[12] Savills Research: What is Happening to Build Costs? (May 2025)

1.82 Within Oxford City Council's Viability Assessment BNP stated that:

'the amount of communal/amenity space required by care schemes reduces the typical net to gross ratio from 80%-85% to 65%-70%. The sales periods are typically longer in comparison to general purpose developments because the market is limited to older people and fewer older people are prepared to buy off-plan. Thirdly, marketing costs are higher due to the extended sales period and also because the average number of viewings per purchaser is significantly higher for older person's schemes in comparison to general purpose developments. Fourthly, the developer will need to ensure services are in place from the first occupation and due to the lengthy sales period, many units will remain unoccupied and therefore not contribute towards the cost of running the services.'

In light of these acknowledged cost and revenue constraints, we request clear confirmation of the build cost assumptions BNP has applied for Typology 8. We further request assurance that these costs include an appropriate uplift relative to standard C3 housing, reflecting the demonstrably higher construction, specification, communal area, marketing, and operational costs inherent in delivering retirement housing schemes.

1.83 We do not consider that BNP has robustly or accurately modelled Retirement Housing within the Viability Assessment. It is not standard practice for Charging Schedules to apply the same CIL rate to C3 housing as to retirement or extra-care accommodation, given the markedly different cost profiles and viability constraints. This distinction is reflected, for example, in Oxford City Council's Charging Schedule, where the CIL rate for C2 and C2A residential and secure residential institutions is set significantly lower than the rate applied to C3 uses.

1.84 We therefore request that BNP revisits and remodels this typology, ensuring that the assumptions properly capture the specific costs, operational characteristics, and delivery challenges inherent in Extra Care and Retirement Housing schemes.

Part 3 – Interpretation of Results

1.85 The appraisal results demonstrate that the capacity to absorb CIL reduces as the proportion of affordable housing increases, with testing undertaken up to 50% across a range of typologies and sales values. Under a policy-compliant position of 40% affordable housing, and assuming an average sales value of £7,125/sqm (£662/sq ft) together with BNP's highest BLV (which, as set out earlier, remains materially understated), only six typologies generate any positive headroom once CIL is applied. All six are high-density flatted schemes, which do not reflect the form, density or location of the emerging strategic allocations. This limited headroom erodes rapidly as sales values soften, and it is notable that

£7,125/sqm sits at the very top of what is realistically achievable in Greater Cambridge, particularly when compared with the new-build evidence included within this submission.

1.86 When sales values are adjusted to reflect closest to the highest average levels evidenced across current new-build schemes (£5,875/sqm (£546/sq ft)) the results deteriorate significantly. At this more realistic value point, only one typology remains viable with CIL while delivering policy-compliant affordable housing. This demonstrates the extreme sensitivity of BNP's results to sales value assumptions and highlights the risk of basing CIL rate-setting on values that exceed what the market is currently achieving. It is also worth noting that sales values are much lower on the peripherals of the city and in the wider area and therefore viability further reduced. If the appropriate BLVs were adopted as suggested in 1.77, it is unlikely that any of the typologies would be viable with policy compliant affordable housing. This is concerning as BNP conclude that the proposed CIL rates do 'strike an appropriate balance between maximising revenue and the potential impact on viability, and securing affordable housing'.

1.87 BNP identify maximum CIL rates by calculating the surplus of residual land value (RLV) over benchmark land value (BLV), and also test the impact of CIL as a cost to assess the effect on RLV. While the report concludes that increases in CIL would generally reduce RLVs by less than 10% and therefore would not prevent development coming forward, this conclusion is highly dependent on the assumptions adopted. As set out in our critique, the BLVs used in the testing are materially understated, being derived from an artificially low agricultural EUV, and the residential sales values adopted, particularly at the upper end of the range, are significantly above the levels evidenced on current new-build schemes across Greater Cambridge.

1.88 The combination of suppressed BLVs and inflated sales values artificially inflates the surplus above BLV and therefore overstates the apparent headroom for CIL. If realistic BLVs were applied, or if sales values were aligned with actual market evidence, the surplus residual would reduce substantially, narrowing viability margins. In such circumstances, even modest increases in CIL could have a far more pronounced impact on scheme viability and land release than BNP's headline conclusions suggest, particularly for the strategic sites on which the emerging Local Plan relies.

Conclusion

1.89 This representation demonstrates that the Draft CIL Charging Schedule is 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.

1.90 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.

1.91 The SPD places substantial infrastructure, open space, biodiversity and land-take requirements on large, low-density, edge-of-settlement sites, yet the proposed CIL rate does not differentiate between typologies or reflect the disproportionate burdens placed on strategic development. The flat £60/m² rate therefore risks over-burdening the very sites that are expected to deliver the majority of future housing and infrastructure. The PPG is clear that differential rates should be used where viability varies by scale, location or type of development; the current approach does not meet this test.

1.92 Throughout this representation, we have highlighted the significant variation in achievable values between city-centre locations and villages on the outskirts of Cambridge. Given these disparities, it would not be appropriate to apply a uniform rate across different uses such as residential, industrial, and office development regardless of location. Distinct value profiles and viability pressures mean that a single, blanket rate would fail to reflect market realities and could undermine deliverability across certain areas. We request that the Charging Schedules reflect this variation as well as distinguishes between office and R&D uses.

1.93 There is also 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.

1.94 The Viability Assessment 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 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.

1.95 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.

1.96 We understand that the proposed rates have been deliberately aligned with those adopted by Oxford City Council, and the Local Authority has confirmed that this approach reflects competitive positioning considerations. The decision to adopt a single flat rate across Greater Cambridge, and to benchmark their proposed rates against Oxford, raises concerns about whether the rate-setting exercise has been predetermined rather than evidence-led. The PPG requires differential rates to be used where viability varies materially by geography, scale or development type. The evidence clearly demonstrates that viability differs significantly between Cambridge City and the more rural areas, yet the Charging Schedule does not reflect this. The Councils' justification is that a simple schedule is needed to “sit alongside Section 106” and help plug the funding gap, does not meet the regulatory requirement to base rates on viability evidence. Comparative analysis with East Cambridgeshire and Huntingdonshire further highlights the risk: both authorities have experienced viability pressures, with Huntingdonshire reporting that infrastructure burdens have already constrained affordable housing delivery. Setting a flat rate risks undermining delivery, particularly on strategic sites.

1.97 For these reasons, the Consortium respectfully requests that the Councils reconsider the timing of the CIL consultation and undertake further work to ensure that the Charging Schedules are aligned with the emerging Local Plan, reflects realistic viability assumptions, avoids double charging, and supports the delivery of policy-compliant affordable housing and strategic infrastructure across Greater Cambridge.

Yours faithfully,

For and on behalf of Savills (UK) Ltd

[redacted]

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