Turley

27 March 2026

By email only
E: CIL@greatercambridge.org

Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
CB23 6EA

Dear Sir/Madam,

REPRSENTATIONS TO PROPOSED COMMUNITY INFRASTRUCTURE LEVY AND CHARGING SCHEDULE FOR SOUTH CAMBRIDGESHIRE

REPRESENTTIONS ON BEHALF OF IMPERIAL WAR MUSEUM

This representation is made on behalf of Imperial War Museum (IWM). IWM Duxford is a unique museum of international historic importance.

The Site is allocated in the South Cambridgeshire Local Plan 2018 as a major tourist / visitor attraction, educational and commercial facility. IWM recently made representations to the Regulation 18 Greater Cambridge Local Plan supporting draft policy S/AMC/IWM for the proposed extension to the existing allocation area.

IWM in conjunction with Gonville and Caius College and selected development partner Henry Boot Development are currently progressing a scheme within the existing allocation, and draft extension for an advanced aviation and related technologies hub (AvTech 1) for circa 45,000 sq m and for IWM a new conservation and storage building (IWM Lab) .

For clarification, the IWM Lab building would sit within IWM Duxford museum site. AvTech would be a commercial use which would be located immediately to the west of IWM Duxford. HBD are leading the planning process for a hybrid application to encompass both AvTech and IWM Lab under a Planning Performance Agreement which is currently at pre-application stage.

Attention is drawn to the comments submitted under this consultation to the draft CIL by Gonville and Caius College and Henry Boot Developments which are supported by IWM.

IWM as a museum and charity would not be subject to a levy. However, concern is expressed regarding the use of a single levy for office and R&D uses and the application of blanket levy across the whole of the Greater Cambridge Area and the timing of the levy in advance of the adoption of the new Greater Cambridge Local Plan.

The introduction of the levy at this time and at these rates risks undermining the economic growth of Greater Cambridge by constraining development.

I set out below our response to your series of questions.

Question 1: Who are you responding on behalf of?

Landowner – Imperial War Museum (IWM). IWM own the airfield and all associated buildings at IWM Duxford museum.

Question 2: Do you wish to participate in the CIL examination?

No

Question 3: Do you agree that the Council should introduce CIL?

IWM support the introduction of CIL in principle. The need to deliver appropriate infrastructure for the expected growth in Greater Cambridge is acknowledged and 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.

Question 4: Do you agree that the Council has demonstrated a funding gap?

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.

Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?

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 Greter Cambridge Local Plan on this point.

It is questioned whether the evidence base is complete.

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?

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.

Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?

It is unclear which elements of the infrastructure requirements will be delivered through CIL and which through S106 Obligations instead of CIL.

IWM question whether there is a risk of double counting and suggest further clarity on how this will be avoided would be helpful.

Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?

No comment

Question 9: Do you agree that the Council has met all regulatory requirements?

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.

Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?

No Comment.

I would be grateful for acknowledgement of receipt of the letter and to be kept informed of the next progress of the CIL preparation.

Yours faithfully

[redacted]

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