Cambridgeshire County Council

My ref: Community Infrastructure Levy

Your ref:

Date: 27th March 2026
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Dear Sirs

Community Infrastructure Levy – Consultation

I refer to the consultation on the draft Community Infrastructure Levy (CIL) Charging Schedule and thank the City and District Council for the opportunity to comment.

Feedback has been received from several County Council services, and the key points are summarised below to support the City and District Council in progressing their respective CIL proposals.

The County Council's principal concern is the expectation that CIL would generate approximately £50 million over the next five years. It is important to understand how this compares with the level of strategic transport infrastructure funding that would otherwise have been secured through Section 106 agreements over the same period. While a direct comparison may be challenging, analysing typical S106 contributions for strategic transport within Greater Cambridge, such as per-square-metre benchmarks, would enable a more informed assessment of the proposed shift from S106 to CIL.

Clarification is also sought regarding the Greater Cambridge Partnership's assumption that future S106 contributions could total around £230 million. If this estimate is realistic, replacing this anticipated funding with £50 million of CIL receipts would represent a substantial reduction in resources for strategic transport infrastructure.

A further concern relates to the effect of CIL on the ability to negotiate S106 for other infrastructure, including libraries and schools. The consultation modelling assumes S106 contributions of £25,000 per dwelling, whereas since 2022 actual secured contributions have typically ranged from £8,000 to £15,000. This discrepancy suggests that both the proposed CIL rates and assumed residual S106 contributions may be set too high. At the same time, the proposed GCSP CIL rates appear low relative to those adopted by neighbouring authorities such as East Cambridgeshire District Council and Huntingdonshire District Council.

Taken together, these issues raise significant concerns about whether the proposed CIL approach will generate sufficient funding to meet the full infrastructure needs arising from planned development, noting the net funding gap of circa £222.5million.

Notwithstanding the comments above the Council has provided comments on the questions within the consultation as part of the response below:

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

There is clear evidence of a funding gap for Greater Cambridge Partnership's programme, which is to be met from local contributions per the agreement with Government.

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

The methodology appears reasonable. However, section 4.26 of the Greater Cambridge: Community Infrastructure Viability document assumes S106 contributions of £25 per square metre for non-residential and £25,000 per unit for residential schemes, and £46,000 per unit for major strategic site allocations. In contrast, the Community Infrastructure Levy Supporting Statement reports that since 2022, secured S106 contributions have typically ranged from £8,000–£12,000 per dwelling for smaller developments and £12,000–£15,000 for larger developments. This indicates that the S106 contributions assumption used in the modelling may be overstated.

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?

On the one hand, section 6 of the Greater Cambridge: Community Infrastructure Viability document indicates that the maximum viable CIL rates are in some cases significantly higher than those proposed. This suggests that developments may be capable of supporting higher CIL charges, which could in turn increase funding available for strategic transport infrastructure.

While the proposed CIL rates are expected to generate £50 million over a five year period, the Greater Cambridge Partnership faces a funding gap of £222.5 million and had anticipated securing £230 million in future S106 contributions. To reduce this gap, it may be appropriate to consider whether higher CIL rates could be introduced without undermining the ability to secure S106 for local infrastructure such as schools, libraries, and health facilities. A key issue is whether the assumption of £230 million in future S106 contributions was realistic.

Conversely, analysis in the Community Infrastructure Levy Supporting Statement shows that S106 contributions secured since 2022 have generally been lower than the values assumed in the modelling. This raises concerns about whether developments can absorb both the proposed CIL rates and the level of S106 contributions assumed.

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

It is clear which elements of public infrastructure will continue to be delivered through S106 and which will be delivered through CIL. However, it remains unclear whether sufficient consideration has been given to how the introduction of CIL will affect the level of S106 that can be secured for infrastructure outside the scope of CIL to ensure that developments are acceptable.

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

The draft instalment policy may support delivery of the Greater Cambridge Partnership's programme, as CIL payments are likely to be received earlier than S106 contributions, improving cashflow at a point when this is a known challenge for the Greater Cambridge Partnership.

The policy appears comparatively generous to developers when set against Oxford City Council's instalment arrangements, which are referenced as a comparator in the Greater Cambridge: Community Infrastructure Viability document. This is alongside the fact that the proposed CIL rates are lower than those adopted in neighbouring authorities such as East Cambridgeshire District Council and Huntingdonshire District Council.

Section 3.4 of the Greater Cambridge: Community Infrastructure Viability document notes that deferring the delivery of a developer's obligations reduces their real cost and increases the scope for affordable housing and other planning obligations. As CIL will be collected earlier than S106, the higher borrowing cost to developers implies a greater financial burden than under S106. This may reduce the level of S106 contributions secured for local infrastructure such as schools, libraries, and healthcare facilities or impact the amount of affordable housing that can be delivered within a scheme.

Infrastructure Statement

The Greater Cambridge Partnership budget assumes £230m of S106 not yet secured. This is rejected in favour of £50m of CIL over the next 5 years. How likely was £230m of S106? How does £50m of CIL compare to what would have been achieved from the £230m?

There is a typographical error in the text on page 45 of the Infrastructure Statement, which should state £50,000,000, not £50.

- *"Analysis shows that CIL will generate around ~~£50~~ £50m over the plan period which will contribute towards closing the funding gap but that a gap of £222m will remain."*

Viability Report

Paragraph 1.5 - Assessment of CIL rates relies on current, not grown appraisal inputs. What if market values fall? Is this built into sensitivity analysis?

Paragraph 2.26 refers to exemptions for affordable housing. While affordable housing delivered through S106 is welcomed, it can reduce the overall level of S106 contributions secured. Any resulting impact should therefore be minimal or offset by the wider benefits associated with delivering additional affordable housing.

Paragraph 3.4 indicates that, because CIL is paid earlier than S106, it imposes a higher real cost on developers due to interest. This raises the question of whether this could result in lower overall CIL receipts compared with S106. However, any reduction in contributions needs to be considered alongside the benefit to the authority of receiving funds earlier, which reduces its own borrowing costs for delivering infrastructure upfront.

Paragraph 4.26 – The appraisal has assumed residual S106 of £25 per square metre for non-residential developments, £25k per unit for residential schemes, and £46k per unit for major identified strategic site allocations. What is a major strategic site allocation? How do these amounts compare to what is currently secured for S106?

Paragraph 6.10 indicates that most residential developments could feasibly absorb a CIL rate significantly higher than £60 per square metre.

Why has a single, area-wide CIL rate been applied across Greater Cambridge? While it is possible that greenfield sites in South Cambridgeshire could support higher CIL charges, it is unclear whether applying differentiated rates would be appropriate or justified.

Paragraph 6.23 notes that Oxford is used as a comparator for office and R&D uses. While the proposed CIL rates for these uses broadly align with Oxford's in absolute (£) terms, this alignment does not reflect the relative balance between use classes within each authority's wider charging structure. This raises the question of whether the proposed rates for offices and R&D in Greater Cambridge are set too high, whether the rates for other development types are comparatively low, or whether Oxford is only an appropriate comparator for R&D and not for other sectors.

Development type/ use	**CCC and SCDC proposed CIL rate per square metre**	**OCC CIL rate per square metre**
Residential houses and flats	£60	£176.24
Retirement housing	£60	£176.24
Residential institutions	£60	£35.24
Student accommodation	£60	£176.24
Hotels	£50	£35.24
Shops, restaurants, financial and professional services	£50	£176.24
Offices and R&D	£175	£176.24
Industrial use including data centres	£35	£35.24
All other uses	£0	£35.24

Paragraph 7.7 notes that the cost of CIL is expected to be passed on to the landowner through reduced land values. However, large developments would previously have been subject to significant S106 obligations. It is therefore important to understand how the proposed CIL charges compare with the level of S106 contributions that will no longer be secured for strategic transport infrastructure.

Community Infrastructure Levy Supporting Statement

If S106 secures £12k-£15k per dwelling, how does the modelling think that it will be able to secure £25k per dwelling for S106 and absorb CIL?

Public Health Implications

From a prevention perspective, the infrastructure secured through CIL will directly shape long-term population health outcomes. National Public Health policy is very clear on the need to shift from treatment to prevention by addressing the wider determinants of health.

Transport systems, air quality, physical activity levels, access to services, and social connectivity are all important health determinants, and they are influenced by how new developments are planned and delivered.

Where sustainable transport infrastructure is delayed or insufficient, car dependency is likely to become embedded early. Once established, these travel behaviours can be difficult and costly to reverse. The consequences include lower physical activity levels, poorer air quality, increased road danger, social isolation, and widening health inequalities.

Public Health therefore emphasises the following priorities:

Front-loading active travel infrastructure

CIL-funded strategic transport infrastructure must prioritise safe, direct, and inclusive walking, wheeling, and cycling routes from the start. Studies have found that residents closer to these routes were less likely to use cars and more likely to cycle, contributing to improved well-being.

High-quality public transport connectivity

Early, reliable public transport provision is essential to prevent car dependency and ensure equitable access to employment, education, healthcare, and community facilities. Accessible public transport acts as a "gateway" to services, crucial for reducing isolation and ensuring timely access to health appointments.

Reducing health inequalities

Infrastructure decisions must be assessed through an equity lens. Developments that rely heavily on private car use disproportionately disadvantage lower-income households, young people, older residents, and disabled people.

Mitigation of mental health stressors

Long commutes and traffic congestion are associated with lower well-being. Improved transport infrastructure that reduces congestion along with better access to active travel routes and green spaces are beneficial to the overall quality of life.

Reduced traffic accidents and improved safety

Prioritising segregated busways, walking and cycling paths (Greenways etc) separates vulnerable road users from heavy traffic thereby reducing the risk of accidents associated with high traffic volumes.

Air quality and long-term system pressures

Investment in sustainable transport infrastructure is a preventative intervention. It supports physical activity, improves air quality, enhances mental wellbeing, and reduces long-term demand on health and care services.

Alignment and accountability

There should be clear alignment between CIL investment decisions and prevention objectives, with transparent prioritisation and monitoring of outcomes such as active travel uptake and accessibility to key services.

Please feel free to reach out if you wish to discuss these comments further.

Yours sincerely

Tim Watkins

Tim Watkins
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