

2nd October 2026

Greater Cambridge Community Infrastructure Levy Examination



Sent via email - ian@localplanservices.co.uk

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Dear Mr Kemp,

Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy Charging Schedules- Examination - submitted on behalf of Hallam Land.

This written statement is submitted by Savills (UK) Limited ("Savills") in respect of the Draft Community Infrastructure Levy ("CIL") Charging Schedules published by Cambridge City Council and South Cambridgeshire District Council, together operating as Greater Cambridge Shared Planning. We submit this statement to highlight our concerns in relation to the issues and questions raised within the Examiner's Note. This statement should be read alongside, and does not supersede, the detailed representation submitted during the Regulation 17 consultation, which we continue to rely upon in full.

Issue 1: Legislative Requirements and Consultation – Question 2

Hallam Land acknowledges that the Councils undertook consultation on the Draft Charging Schedule between 16th February and 29th March 2026. However, Hallam Land remains concerned by the approach taken in Quintic Advisory's review of consultation responses. Several respondents independently raised similar concerns regarding the robustness of the viability evidence. Despite this convergence of evidence from across the development industry, Quintic's review records largely uniform responses, with the action recorded as "None"¹ against the majority of representations. As a result, no amendments were made to either the viability assumptions or the draft Charging Schedule.

Evidence submitted by developers and agents active within Greater Cambridge frequently contrasted with the assumptions adopted by Quintic yet was often discounted on the basis that further information or context had not been provided. Hallam Land considers that, where additional clarification was considered necessary, further engagement with respondents would have provided an opportunity to test and verify the evidence submitted. In the absence of such engagement, it is considered that substantive market evidence should not be afforded reduced weight solely because further contextual information was considered necessary.

¹ Greater Cambridge CIL – Review of Representations



Hallam Land is concerned that several responses rely on the assertion that the proposed rates are "modest" and therefore unlikely to affect viability. Regulation 14(1) of the CIL Regulations requires charging authorities to strike an appropriate balance between infrastructure funding and the economic viability of development. The relevant test is whether the proposed rates would undermine development viability, based on evidence, rather than whether the increase appears modest in percentage terms. Hallam Land maintains that the robustness of the viability evidence remains a key matter for consideration through the Examination.

Issue 3 – Residential Charging Rates – Question 1 - Do the 26 residential typologies provide for a sufficiently comprehensive assessment in terms of the types of developments likely to come forward?

As set out in our Regulation 17 representation², Hallam Land does not consider that the 26 residential typologies provide a sufficiently comprehensive or representative assessment of the types of development likely to come forward through the emerging Local Plan. The typologies rely on assumptions regarding developable area, unit sizes and density that do not reflect the requirements of the emerging Local Plan. Several assume 100% net developable areas and uniform dwelling sizes across different forms of development, including flatted schemes, resulting in densities and development outputs that are not representative of policy-compliant masterplans.

Of particular concern is the absence of an appropriate intermediate typology for lower-density strategic edge-of-settlement development. Hallam Land's promoted site illustrates this gap, comprising approximately 54.5 hectares and around 1,000 dwellings, alongside substantial supporting infrastructure including a primary school, local centre, community sports facilities and open space. At approximately 18 dwellings per hectare, the site demonstrates the significant land-take associated with strategic development of this nature. None of the typologies adequately reflects development of this scale, density and infrastructure burden.

This represents a material gap in the viability testing. The relevant consideration is not simply the number of typologies assessed, but whether they adequately represent the range and characteristics of development expected to come forward through the emerging Local Plan.

Unless the typologies have been re-tested using assumptions that more accurately reflect the likely form, density, developable area and development efficiency of policy-compliant schemes, Hallam Land does not consider that they provide a sufficiently robust basis upon which to assess the viability effects of the proposed residential CIL rates.

Question 2 - Is the evidence on residential sales values sufficiently comprehensive?

The Viability Assessment applies a residential sales value range of £371.61/sq ft to £836.12/sq ft, yet provides no transparency as to the underlying comparables, including the locations, transaction dates, tenure,

² 4.2.22 Hallam Land Representation (page12)

specification, or whether the evidence relates to new-build or second-hand housing stock. The representation includes market evidence of current new-build sales values ranging from £356/sq ft to £538/sq ft³ across a range of active schemes delivered by major housebuilders in and around Cambridge. This is material because overstating sales values will correspondingly overstate residual land values and the apparent viability headroom available to absorb CIL. In the absence of transparent evidence identifying the locations and development typologies to which the upper values are intended to apply, Hallam Land does not consider that the evidence demonstrates that those assumptions are representative of developments likely to come forward.

Question 7 – Is the additional cost assumption for larger residential developments on the edge of settlements (£29,070 per unit) justified and appropriate?

Hallam Land does not consider that sufficient evidence has been provided to demonstrate that the £29,070 per-unit allowance adequately reflects the infrastructure costs associated with large, edge-of-settlement development. As set out in our Regulation 17 representation, strategic sites are typically required to fund substantial primary and enabling infrastructure, including strategic highways, utilities reinforcement, drainage, green and blue infrastructure, and other works necessary to unlock development.

Despite this issue being expressly raised in our previous representation, Quintic has provided no further evidence or explanation as to how the £29,070 allowance has been derived, which infrastructure items it is intended to cover, or why it is considered representative of the costs likely to be incurred by strategic-scale development.

This lack of clarity is material to the assessment of viability. To the extent that infrastructure costs are omitted from, or underestimated within, the £29,070 allowance, those additional costs would directly reduce the viability headroom available to absorb CIL. Hallam Land therefore considers that the Councils should identify the constituent costs included within the allowance, explain the basis on which those costs have been assessed, and demonstrate that the overall allowance appropriately reflects the infrastructure burden likely to be borne by strategic edge-of-settlement sites.

Question 9 – What is the basis for the approach to benchmark land values and is this appropriate?

³ 4.2.22 Hallam Land Representation (page 15)

Hallam Land does not object to the EUV+ approach in principle but considers that the EUVs underpinning the adopted BLVs are insufficiently evidenced and materially understate agricultural land values. Quintic assumes greenfield EUVs of £20,000 to £23,000 per hectare. By contrast, the evidence set out in Hallam Land's representation⁴ identifies an East of England average of £57,079 per hectare and Greater Cambridge transactions ranging from £31,683 to £57,217 per hectare. For the avoidance of doubt, Hallam Land is not advocating a market value or transactional approach to BLV. The transactional evidence is relied upon as a cross-check on the reasonableness of the underlying EUV assumption. Given the material disparity between that evidence and the EUVs adopted in the Viability Assessment, Hallam Land considers that the assumed EUVs require further justification. As the EUV forms the starting point for the application of the premium used to derive BLV, any understatement of the underlying EUV will correspondingly affect the resulting BLV.

This is material to the proposed CIL rate because an understated BLV overstates the viability headroom available to absorb CIL. Applying a 15 to 20 times premium to an EUV of £49,420 per hectare, which is consistent with the local evidence provided within the Representation⁵, would result in a BLV of approximately £741,300 to £988,400 per hectare. The significant disparity between the assumed EUV and the evidence presented by Hallam Land warrants further examination of whether the adopted BLVs of £250,000 to £370,000 per hectare provide a sufficiently evidenced and appropriate incentive for land to come forward.

As the proposed £60 per sqm residential rate is derived from this viability headroom, Hallam Land does not consider that it is supported by appropriate evidence. Hallam Land therefore asks the Examiner to invite the Councils to justify the adopted EUVs against the transactional evidence or, failing that, to re-test the residential appraisals using appropriately evidenced BLVs before the proposed rate is approved.

In light of the matters set out above and in the Hallam Land's Regulation 17 representation, Hallam Land considers that the evidence currently before the Examination does not provide a sufficiently robust basis to support the proposed residential and office/R&D CIL charging rates.

In particular, Hallam Land considers that further evidence and/or testing is required in relation to:

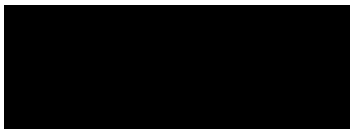
- the residential typologies;
- residential sales values and their application across the typologies;
- the EUVs and BLVs adopted in the residential appraisals;
- the infrastructure cost allowance applied to larger edge-of-settlement development.

⁵ 4.2.22 Hallam Land Representation (page 23)

Hallam Land therefore requests that the Councils be invited to provide the necessary justification and, where appropriate, undertake further sensitivity testing before the relevant rates are approved. Where that evidence demonstrates materially lower viability headroom, Hallam Land considers that the relevant charging rates should be reduced accordingly so that CIL does not put the delivery of otherwise sustainable and policy-compliant development at risk.

Yours faithfully,

For and on behalf of Savills (UK) Ltd



**Molly Eyles MSc MRICS
Associate**