

CIL Compliance Statement: Beehive Inquiry

Cambridge City Council

Planning Application Called-In By The Secretary Of State

Planning Inspectorate Reference: APP/Q0505/V/25/3360616

Local Planning Authority Reference: 23/03204/OUT

30 June 2025

Background

1. This CIL Compliance Statement has been prepared by the LPA on behalf of Cambridge City Council to outline how each of the proposed obligations in the First to Eleventh Schedules of the draft Section 106 Agreement would comply with the tests set down in Section 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) (“the Regulations”).
2. Regulation 122(2) sets out the tests for the use of planning obligations as follows:
 - a) **necessary to make the development acceptable in planning terms;**
 - b) **directly related to the development, and**
 - c) **fairly and reasonably related in scale and kind to the development.**
3. These tests are also stated in paragraph 58 of the National Planning Policy Framework (NPPF).

Local Planning Policies & Supplementary Guidance Documents

4. The following policies from the Cambridge Local Plan (2018) (**CD4.04**) are referred to in support of the case that the proposed planning obligations meet the Regulation 122 tests:

Policy 2: Spatial Strategy for the location of employment development
Policy 5: Sustainable transport and infrastructure
Policy 40: Development and expansion of business space
Policy 56: Creating successful places
Policy 59: Designing landscape and the public realm
Policy 70 Protection of priority species and habitats
Policy 73: Community, sports and leisure facilities
Policy 80: Supporting sustainable access to development
Policy 81: Mitigating the transport impact of development
Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy.

5. The relevant SPDs to the proposed planning obligations are:
 - Planning Obligations Strategy Supplementary Planning Document - Adopted March 2010 & Updated 2023
 - **Greater Cambridge Planning Obligations Supplementary Planning**

Document (Draft Consultation – Winter 2024, Second Consultation – Summer 2025) including as follows:

- Planning and Transport Scrutiny Committee (PTSC) Paper: Greater Cambridge Planning Obligations Supplementary Planning Document: Adoption – 25 March 2025; and**
- Minutes of the PTSC Executive Councillor for Planning, Building Control and Infrastructure: Decision (concerning additional consultation) to agree Officer Recommendations – 25 March 2025**
- Cambridge City Council Public Art Supplementary Planning Document (Adopted January 12th, 2010)
- Biodiversity SPD – Adopted February 2022

Summary of proposed planning obligations

6. The Compliance Statement should be read in association with the accompanying draft Section 106 Agreement dated 10 June 2025.
7. The planning obligations comprise the following:
 - Schedule 1 Employment & Skills Strategy
 - Schedule 2 Community Outreach Strategy
 - Schedule 3 Start-Up Space and Scale-Up Space Strategy
 - Schedule 4 Community Floorspace
 - Schedule 5 Public Realm & Public Realm Management Strategy
 - Schedule 6 Meanwhile Use Strategy
 - Schedule 7 Local Centre Strategy
 - Schedule 8 Biodiversity Net Gain
 - Schedule 9 Off-Site Leisure Contribution
 - Schedule 10 Travel Plan, Transport Contributions & Monitoring
 - Schedule 11 Public Art Strategy

Assessment of Compliance

8. The first CIL test is that all obligations must be “Necessary to make the development acceptable in planning terms”, i.e. this test requires all obligations to be articulated through the local, regional or national planning policies - in this case the adopted Cambridge Local Plan 2018. For each obligation the relevant policies are stated.

9. The second CIL test is that the obligation must be “Directly related to the development”, i.e. there should be a functional or geographical link between the development and the item being provided as part of the developer's contribution. Under each section, it is explained how the necessary infrastructure relates to the development.
10. The third CIL test requires that the obligation must be “Fairly and reasonably related in scale and kind to the development”, i.e. developers may reasonably be expected to pay for or contribute to the cost of all, or that part of, additional infrastructure provision which would not have been necessary but for their development. Under each section it is explained how the level of contribution / obligation has been arrived at and how it does not seek to secure any betterment over and above that which is appropriate and reasonable.
11. The following table explains how the above planning obligations comply with the three CIL regulations tests.

PLANNING OBLIGATION DESCRIPTION & RELEVANT S106 SCHEDULE(S)		TRIGGER	TEST 1 - NECESSARY TO MAKE DEVELOPMENT ACCEPTABLE IN PLANNING TERMS	TEST 2 - DIRECTLY RELATED TO THE PROPOSED DEVELOPMENT	TEST 3 - FAIRLY AND REASONABLY RELATED IN TERMS OF SCALE AND KIND TO THE PROPOSED DEVELOPMENT
EMPLOYMENT & SKILLS STRATEGY (ESS)					
Schedule 1	Provide a site-wide ESS for Construction Phases of development for approval by the Council.	Before commencement of development	A site-wide ESS for Construction Phases of development is necessary in order that the development can build on the commitments identified in the Applicant's supporting Employment and Skills Strategy (Volterra, August 2024) (CD2.05). The site-wide ESS supports the Council's planning policy objectives which are to strengthen and diversify the economy by supporting a range of employment and training opportunities. All major development proposals in Greater Cambridge are (now) being encouraged via the Draft S106 SPD to provide an ESS which can identify how it will contribute directly through employment skills and training programmes to improve outcomes for local residents/communities. The aim of obtaining a sitewide ESS for the Construction Phases is supported by CLP under Policies 2, 40 and 85 including the Draft Consultation Greater Cambridge Planning Obligations SPD (Winter 2024).	The ESS for Construction Phases would directly relate to securing relevant jobs and training opportunities generated by the proposed development only.	The ESS for Construction Phases of development is considered fair and reasonable in that it would assist in directly addressing the Council's planning objectives which are to strengthen and diversify job opportunities created by the development proposals.
Schedule 1	Provide a site-wide ESS for Operational Phases of development for approval by the Council.	Before occupation of any commercial building	A site-wide ESS for Operational Phases of development is necessary so that the development can support the Council's planning policy objective which is to grow and maintain the Cambridge Cluster of knowledge-based industries in high technology and life science research.	The ESS for Operational Phases would directly relate to securing relevant jobs and training opportunities generated by the proposed development only.	The ESS for Operational Phases of development is considered fair and reasonable in that it would assist in directly addressing the Council's planning objectives which are to strengthen and diversify job opportunities created by the development proposals.

			The aim of obtaining a sitewide ESS for the Operational Phases is supported by CLP under Policies 2, 40, 85.		
Schedule 1	Pursuant to each Approved ESS, to monitor, review and report to the Council in accordance with their respective time periods.	For ESS Construction Phases: No less than once in every twelve-months for full duration of each construction phase. For ESS Operational Phases: Once every year for a total five (5) years following occupation of each commercial building.	Necessary to ensure the relevant (approved) strategies are meeting their agreed aims and objectives.	The monitoring and review of the (approved) strategies are directly relevant to the proposed development.	The monitoring and review of the (approved) strategies is fair and reasonable within the context of securing a range of job opportunities as a result of the proposed development.
COMMUNITY OUTREACH STRATEGY (COS)					
Schedule 2	Provide a COS strategy that will demonstrate how the proposed development will seek to support and deliver a range of community/public programme events in relation to the (provision of) proposed new onsite public realm and/or Community Floorspace.	Before occupation of any commercial building.	It is necessary to secure a COS which will build on the commitments identified in the Applicant's supporting Social Infrastructure Strategy (Volterra, August 2024)(CD2.07). The objective of the COS is a fundamental component of placemaking which involves creating high quality, sustainable and inclusive development for existing and future users. This approach is consistent with the Council's planning policy aims for all new development. The aim of obtaining a sitewide COS is supported by CLP Policies 56 and 85.	The COS would directly relate to how the proposed development would support the identified needs of the local community as set out in the Applicant's submitted Social Infrastructure Strategy (Volterra, August 2024)(CD2.07).	The COS is fair and reasonable in that it would build on the commitments to the local community which are identified in the Applicant's submitted Social Infrastructure Strategy (Volterra, August 2024)(CD2.07).
Schedule 2	Pursuant to the Approved COS, to monitor, review and report to Council in accordance with the Approved Monitoring Regime.	Once every twelve (12) months for ten (10) years following first occupation of first commercial building.	Necessary to ensure the (approved) COS meets its agreed aims and objectives.	The monitoring and review of the COS is directly relevant to the (approved) COS which will focus on opportunities created from the proposed development of the site.	The monitoring and review of the (approved) COS is both fair and reasonable.

START-UP SPACE & SCALE-UP SPACE STRATEGY					
Schedule 3	Provide a strategy that identifies how the operational phase can directly support start-up and scale-up workspaces for approval by the Council.	Before occupation of any commercial building.	It is necessary to secure a Start-Up and Scale-Up Strategy that will demonstrate how the proposed development can support start-up and scale-up capacity. The Applicant's own submitted market analysis: '<i>Cambridge: Office & Laboratory Occupational Market Update The Beehive Centre Redevelopment</i>,' (Bidwells, August 2024)(CD2.28) specifically has acknowledged a growing demand for smaller lab and scale up spaces across the city. The aim of obtaining a Start-Up and Scale-Up Strategy is supported by CLP under Policies 2, 40 and 85 including the Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs (Final Report, September 2024).	The Start-Up and Scale-Up Strategy directly relates to (future) operational phases of the proposed development only.	The Start-Up and Scale-Up Strategy is a fair and reasonable in terms of being able to meet and demonstrate how the proposed development meets needs where appropriate.
Schedule 3	To prepare and submit a report to the Council that will confirm the outcomes and objectives of the Approved Start-up Space and Scale-Up Space Strategy following implementation.	Once every twelve (12) months ceasing on the fifth (5 th) anniversary of the first (1 st) use of any start-up and scale-up space.	It is necessary to ensure the (approved) Start-Up and Scale-Up Strategy is meeting its prescribed aims and objectives.	The report would be directly relevant to potential future start-up space and scale-up businesses within the proposed development.	The report is fair and reasonable and would demonstrate how the opportunities for start-up and scale-up businesses is being achieved.
COMMUNITY FLOORSPACE (ONSITE)					
Schedule 4	To provide the Community Floorspace Scheme and Community Floorspace.	Prior to practical completion of fifty percent (50%) of the Commercial Floorspace.	Necessary to ensure the onsite Community Floorspace identified in its proposed commitments via the Social Infrastructure Strategy (Volterra, August 2024) (CD2.07) can be delivered and maintained. The provision of Community Floorspace is a key objective of good placemaking which involves creating high quality, sustainable and inclusive development for existing and future users.	The Community Floorspace Scheme and Community Floorspace relates to the provision of future ground floor uses as shown on its parameter plans.	The Community Floorspace is fair and reasonable in scale and kind insofar that it is integral to the overarching placemaking objectives which are to deliver a high quality, inclusive and sustainable new place.

			The provision of a Community Floorspace is supported by CLP Policies 56, 73 and 85.		
Schedule 4	To ensure the Community Floorspace is managed and maintained in accordance with Approved Community Floorspace Scheme.	Following practical completion of the Community Floorspace.	To ensure that the Community Floorspace is operated in accordance with the (approved) Community Scheme.	The Community Floorspace Scheme relates to how future provision can be managed and maintained within the proposed development.	The management and maintenance of the Community Floorspace is integral to ensuring a high quality, inclusive and sustainable place is delivered.
PUBLIC REALM MANAGEMENT STRATEGY					
Schedule 5	To deliver “Hive Park” (open space).	Before occupation of the first (1 st) commercial building.	It is necessary to ensure Hive Park can be delivered (within the specified/practicable time period) and in accordance with the details of the outline planning proposals.	Hive Park is a new open space of c.7000m2 located at the southern entrance of the proposed development (and as shown in the relevant plan at Appendix 1 of the S106 Agreement).	Hive Park comprises a significant part of the total green infrastructure to be provided onsite and is important to achieving key placemaking objectives of the proposed development.
Schedule 5	To submit for approval by the Council the Public Realm Management Strategy. The PRMS shall set out details of future access, delivery, management and maintenance of all open spaces and public realm spaces for the lifetime of the development.	Before completion of the first (1 st) area of public realm.	It is necessary to ensure that all onsite public realm/open spaces are managed and made accessible in accordance with up-to-date best practice advice for the lifetime of the development. The objectives of an PRMS is supported by CLP Policies 56, 59 and 85.	The PRMS would directly relate to the future management and maintenance of all public realm/open spaces to be provided as part of the proposed development.	The PRMS is fair and reasonable in terms of the amount of onsite public realm to be managed over the lifetime of the proposed development.
MEANWHILE USE STRATEGY (MUS)					
Schedule 6	To submit a Meanwhile Use Strategy (MUS) that identifies how temporary onsite uses can be deployed throughout the construction phase for approval by the Council.	Before commencement of development.	The MUS is necessary to support and enhance the placemaking aims and objectives of the proposed development that can be deployed during the demolition and construction phases. The objectives of an MUS is supported by CLP Policies 56, 59 and 85.	The MUS is directly related to the future use of spaces within the proposed development.	The MUS is a fair and reasonable approach to ensure the future development can support the creation of an inclusive and sustainable new place.

LOCAL CENTRE STRATEGY (LCS)					
Schedule 7	To submit a Local Centre Strategy (LCS) that identifies the location, size and mix of active ground-floor non-laboratory or office uses for approval by the Council.	Before occupation of Buildings 5-10.	The LCS is necessary to ensure an attractive and vibrant new local centre can be created which: - supports/complements other nearby designated shopping centres; - ensures the daily needs of local people and (future) onsite employees are being met; and - delivers the placemaking objectives of the proposed development. The Applicant's submitted Benefit's Delivery Plan (Leonard Design, August 2024) (CD2.11) has identified an overarching strategy which begins to demonstrate how mixed-use ground floor spaces could come forward to activate place and create an attractive and welcoming destination in the city. This approach is supported by CLP Policies 40,56,73 and 85 which seek to support the creation of inclusive and sustainable places.	The LCS is directly related to the provision of a new local centre and accords with the details of the proposals submitted.	The LCS is a fair and reasonable approach to ensuring that the needs of the future onsite working population and local community can be met including delivery of its placemaking objectives.
Schedule 7	To submit a report detailing the effectiveness of the Approved LCS including a mechanism to amend as necessary.	Within six (6) months of completion of the development.	To ensure that the aims and objectives of the (approved) LCS (or future updated versions) are being met.	The report is directly related to the proposed provision of a new local centre onsite.	The report is fair and reasonable insofar that it relates to the future success and performance of the onsite local centre.
BIODIVERSITY NET GAIN (BNG)					
Schedule 8	To secure BNG Monitoring Contributions for a maximum period of 30 years. A total sum of £5,000 would be payable in instalments throughout 30-year period	Following first occupation of first building to make instalments of one tenth as follows: - Annually for first 5 years; and thereafter	The BNG Monitoring Contributions are necessary to ensure the proposed aims and commitments to enhance onsite biodiversity are being delivered. This approach is supported by CLP Policies 69, 70 and 85; including adopted GCSP Biodiversity SPD (February 2022).	The BNG Monitoring Contribution is directly related to ensuring the delivery of (future) BNG commitments onsite.	The BNG Monitoring Contribution relates to recovering the reasonable costs of the Council in monitoring the implementation of BNG over the duration of 30 years.

	at years 1-5, 10, 15, 20, 25 and 30.	- On the 10 th , 15 th , 20 th , 25 th and 30 th anniversaries.			
OFF-SITE LEISURE CONTRIBUTION					
Schedule 9	To provide a financial contribution of £11,590 towards the improvement of off-site existing leisure facilities at Abbey Sports Centre and Gym or Parkside Pools and Gym.	Prior to commencement of development	Necessary to address the loss of the existing onsite leisure facility. Policy 73 would normally require that a facility of this kind would either be re-provided like-for-like onsite in the new development or relocated to a similar specification and access or it is demonstrated that it is no longer required. Noting the policy position, officers have accepted that a complete reprovision of the facility (including its swimming pool) would not be justified particularly given its current scale, proximity of other leisure facilities, including the other wider benefits the proposed scheme would deliver if approved. However, officers considered that there is potential for the demand to be displaced onto nearby public run leisure facilities as a result. Therefore, it considers a financial contribution would be a more reasonable way/mechanism to address this current conflict. The above approach is supported by CLP Policy 73 and 85.	The contribution relates to directly off- setting the loss of an existing onsite leisure facility.	The proposed contribution is based on mitigating the loss of the existing gym/pool floorspace area of 1,948m2 (GIA).
TRAVEL PLAN, TRANSPORT CONTRIBUTIONS & MONITORING					
Schedule 10- Part 1	Financial contributions towards implementation of new bus services, local and strategic transport measures as follows: 1. Bus Contribution [£1,947,000]	Amounts to be paid on occupation of percentage (%) of commercial floorspace, or in relation to a CPZ Contribution call notice.	Bus Contribution - The Transport Assessment details a target mode share of 8% for bus, 8% for park and ride and 14% for train and bus. The distribution of trips to and from the development, and the extent of existing bus services, demonstrates that additional bus services are necessary to ensure that the bus mode share targets can be met. The applicant proposes a package of	Transport infrastructure is directly related to the development as it ensures that employees and those travelling to and from the development have adequate infrastructure to access the development site and area. They relate to the trips to and from and within the development area as	These contributions are considered to be reasonable in both kind and scale to the development size and quantum

	2. Coldhams Lane Bus Shelter Contribution [£20,000] 3.Car Parking Zone Contribution [£30,000] 4.Harvest Way Contribution [£5,000] 5. GCP Bottisham Greenway Contribution [£30,000] 6. GCP Chisholm Trail Contribution [£350,000] 7. GCP Eastern Access Improvements Contribution [£657,000]		bus improvements including for Milton and Newmarket Park and rides, and local bus services from St Neots, Huntingdon, St Ives to provide an additional 825 to 900 seats in the peak hours. Cycling Contribution - The Transport Assessment details a target mode share of 40% for cycling. The distribution of trips to and from the development demonstrates that many of the cycle trips will be on the Greater Cambridge Partnership cycle and pedestrian enhancement schemes of the Chisholm Trail, Eastern Access and Bottisham Greenway in particular. Contributions to these key schemes are necessary as they will ensure delivery of the parts of these schemes that will directly benefit those travelling to and from the development. This includes a new crossing place over Newmarket Road at its junction with Coldhams Lane and a new junction where the Chisholm Trail crosses Coldhams Lane. The GCP scheme delivery and funding is predicated on match funding from developments to make the funding shortfall between the City Deal funding and the scheme costs. This also allows for schemes to be ‘back funded’ to ensure that the developer funding received fairly distributed across the schemes. These contributions are supported under CLP Policies 5, 80, 81 and 85.	detailed in the Transport Assessment.	
Schedule 10-Part 2	Delivery off-site improvement works to satisfaction of CCC including:	Before occupation of specified buildings or levels of commercial floorspace.	These measures are necessary to mitigate the impacts of movements on the existing highways generated by the proposals. Improving these key access points will ensure improved access to	Transport infrastructure is directly related to the development as it ensures that employees and those travelling to and from the development have adequate infrastructure to access the	The works to be delivered by the applicant are considered to be in scale and proportion to the development size and quantum.

	1. Site access with Coldhams Lane 2. Sleaford Street 3. York Street 4. St Matthew's Gardens 5. Programme for phased delivery of cycle routes with wayfinding signage 6. Coldhams Lane Works Submit a Feasibility Study in relation to the delivery of new bus stops for approval by CCC. Should new bus stops not be feasible, either to implement Alternative Works (as may be agreed) or pay the Alternative Works Contribution of £330,000		the development site from the immediate surrounding area. These works are supported under CLP Policies 5, 80, 81 and 85. This approach is supported under CLP Policies 5, 80, 81 and 85.	development site and area. They relate to the trips to and from and within the development area as detailed in the Transport Assessment.	
Schedule 10-Part 3	Establish a Transport Review Group (TRG)	Before occupation of 25% of the commercial floorspace.	The establishment of a TRG is necessary to review and agree the appropriate strategic transport measures that will mitigate the wider impacts of the proposed development. This approach would comply with CLP Policies 5, 80, 81 and 85.	The TRG directly relates to the operation of the Monitor Manage Scheme.	The TRG facilitates the successful implementation of the Monitor and Manage Scheme.
Schedule 10-Parts 4 & 5	To implement the Monitor and Manage Scheme. To pay the Monitor and Manage Contributions where it is justified/necessary and not to exceed total [£1,275,000].	Following occupation of fifty percent (50%) of commercial floorspace. Within 30 working days of the receipt of Monitor and Manage Notice.	The target mode share for car and van driver and passengers will be monitored against targets in accordance with an agreed Monitor and Manage Scheme. The monitor and manage fund will be allocated if the mode share targets are not met. It is necessary as an incentive and will be used for mitigation schemes identified in Appendix 4 to the s106 agreement. This will be determined by the Transport Review Group.	Transport infrastructure is directly related to the development as it ensures that employees and those travelling to and from the development have adequate infrastructure to access the development site and area. They relate to the trips to and from and within the development area as detailed in the Transport Assessment.	These contributions are reasonable in both kind and scale to the development size and quantum.

			This approach would comply with CLP Policies 5, 80, 81 and 85.		
Schedule 10-Part 6	To submit and implement Travel Plans to satisfaction of CCC. To pay associated Travel Plan Monitoring Contribution of £25,000.	Details of Travel Plans to be submitted with each RMA. Payment of Travel Plan Monitoring Contributions prior to occupation of first qualifying commercial building.	The Travel Plan and monitoring contribution is necessary to enable and encourage employees of the site to travel to the development more sustainably, and for the Local Highway Authority to be able to monitor progress and work with the occupants of the site as the site develops. The Travel Plan associated monitoring contribution would comply with CLP Policies 5, 80, 81 and 85.	The Travel Plan is directly related to the development as it ensures that employees and those travelling to and from the development have adequate knowledge and measures to encourage them to infrastructure to access the development site and area. They relate to the trips to and from the development area.	The Travel Plan and monitoring contributions are considered to be reasonable in both kind and scale to the development size and quantum.
PUBLIC ART STRATEGY					
Schedule 11	To submit and implement a Public Art Delivery Plan (PADP) on any phase which contains a Public Art Zone which reflects the overarching principles of the Public Art Strategy. To secure a total financial commitment towards delivering PA onsite equal to £700,000. To manage and maintain the public art in accordance with the details to be agreed in the PADP.	Before commencement (other than demolition) on any phase containing a Public Art Zone.	In order to secure a high quality and distinctive location in accordance with the submitted Public Art Strategy and to ensure the wider placemaking objectives of the proposed development are achieved. This approach is supported by CLP Policies 56, 59 and 85; and Cambridge City Council Public Art SPD (2010).	The PAS directly relates to the final delivery and its management of public art onsite.	The PAS and the total financial commitment made to ensure its delivery and management over the lifetime of development is fair and reasonable and would comply with key objectives which are to create an attractive, distinctive and sustainable new development in the city.
SECTION 106 MANAGEMENT & MONITORING					
N/A	Cambridge City Requirement: To secure monitoring contributions in relation to the administration and management of the S106		A S106 management and monitoring obligation is necessary to ensure the planning obligations to be secured can be reasonably delivered and thereafter managed.	The S106 management obligation directly relates to the monitoring and administration of the relevant commitments made in the proposed Agreement.	Requested fees comply with CIL Amendment Regulations (no.2) 2019 which includes a provision allowing LPAs to charge a fee through S106 to help meet the cost of monitoring and reporting on developer contributions. The

	Agreement. The total contribution equates to £21,700 broken down as follows: Section 106 Fixed Amount @ £2,200 to be paid on commencement; and £19,500 towards review and monitoring of compliance with relevant planning obligations*and to be paid in 5 equal instalments of £3900. These include: * Schedule 1 – Employment and Skills Strategy Schedule 2 – Community Outreach Strategy Schedule 3 – Start-Up and Scale-Up Strategy Schedule 4 – Community Floorspace Scheme Schedule 5 – Public Relam Management Strategy Schedule 6 - Meanwhile Use Strategy Schedule 7 - Local Centre Strategy Schedule 11 - Public Art Cambridge County Council Requirement: Monitoring fees of £3,330 to be secured towards the monitoring of compliance with obligations pursuant to Schedule 10 only.	Paid on commencement Paid on first anniversary of commencement of development.			applicable fees were formally approved in July 2022 by Cambridge City Council's Executive Councillor for Planning Policy and Infrastructure.
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