

2nd October 2026

Greater Cambridge Community Infrastructure Levy Examination



Sent via email - ian@localplanservices.co.uk

Molly Eyles MSc MRICS

Botanic House
100 Hills Road
Cambridge, CB2 1PH
savills.com

Dear Mr Kemp,

Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy Charging Schedules- Examination - submitted on behalf of Endurance Estates and Pigeon ('the Consortium').

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

The Consortium acknowledges that the Councils undertook consultation on the Draft Charging Schedule between 16th February and 29th March 2026. However, the Consortium 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. The Consortium 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, the Consortium considers 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



The Consortium 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. The Consortium 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, the residential typologies are based on assumptions regarding developable area, unit sizes and density that do not reflect the requirements of the emerging Local Plan. Several typologies assume 100% net developable areas and uniform dwelling sizes across all forms of development, including flatted schemes, resulting in densities and development outputs that are not representative of policy-compliant masterplans. 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, the Consortium does not consider that they provide a sufficiently representative 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, 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, the Consortium does not consider that the evidence demonstrates that those assumptions are representative of developments likely to come forward.

Question 3 - How has it been used to appraise different residential typologies, including retirement housing and residential institutions?

² 4.2.19 Endurance Estates and Pigeon Representation (page 11)

³ 4.2.19 Endurance Estates and Pigeon Representation (page 13)

The Consortium does not consider that the Viability Assessment demonstrates that retirement housing has been appropriately appraised as a distinct development typology. Quintic's response to concerns appears to rely on the level of viability headroom identified for other residential development as justification for not undertaking specific testing. This does not demonstrate that the economics of retirement housing have been appropriately captured. The Consortium therefore considers that the proposed application of CIL to retirement housing should be supported by specific viability testing rather than inferred from the performance of conventional residential typologies. This issue has also been raised by several respondents, reinforcing the need for the evidence base to demonstrate that the proposed rate would not place this form of development at undue risk.

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

The Consortium 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 the Consortium'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, the Consortium 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, the Consortium considers that further justification of the assumed EUVs is required and consequently the premium applied to arrive at BLV's should be tested. The substantial difference between Quintic's assumed EUVs and the available evidence therefore requires further justification.

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 the Consortium 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, the Consortium does not consider that it is supported by appropriate evidence. The Consortium 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.

⁴ 4.2.19 Endurance Estates and Pigeon Representation (page 25)

⁵ 4.2.19 Endurance Estates and Pigeon Representation (page 25)

Issue 7: Charging rate for offices and R&D - Question 6: Are the assumptions on rental income appropriate?

As set out in the Consortium's representation, the office rents and yields adopted within the Viability Assessment fail to reflect the significant variation that exists across the Greater Cambridge office market. Evidence⁶ was submitted demonstrating a broad range of achieved rents across different locations and building types, yet this evidence has not been meaningfully addressed. Quintic's response notes that new office developments would not be expected to achieve secondary market rents⁷. Whilst this is accepted, it does not address the underlying point that office rents are intrinsically linked to location. A prime, new-build office in Cambridge city centre will not command the same rental levels as a comparable new-build office located in an out-of-centre or peripheral market. By applying a single rental and yield assumption across the whole area, the Viability Assessment does not adequately reflect the locational variation within the Greater Cambridge office market and risks overstating development values in weaker locations.

Question 7: Are the other assumptions including on profit, other costs and policy requirements appropriate? To what extent have emerging Local Plan policy requirements been taken into account?

The Consortium is concerned that the Viability Assessment does not demonstrate how emerging Policy J/AW (Affordable Workspace and Creative Industries)⁸ has been accounted for in the office and R&D appraisals. The policy requires a proportion of net additional office/R&D floorspace to be provided as affordable workspace at rents discounted by at least 30% below market level in perpetuity, a direct reduction in rental income with a material bearing on development value and viability.

The Viability Assessment references Policy J/AW⁹ but does not confirm whether the rental assumptions have been adjusted to reflect its requirements. In addition, the policy threshold cited in the Viability Assessment does not appear to correspond with that currently proposed through the emerging Local Plan. The Viability Assessment assumes that developments over 2,500 sqm must provide 10-20% affordable workspace, whereas the emerging Local Plan identifies a threshold of developments exceeding 1,000 sqm.

Since the proposed office and R&D CIL rate is derived directly from assumed rental income and residual headroom, an untested affordable workspace allowance risks overstating schemes' capacity to absorb CIL. The Consortium therefore requests that the Councils confirm how Policy J/AW has been incorporated into the office and R&D appraisals. If it has not been, the Consortium's position is that the £175 per sqm rate cannot be shown to be supported by the evidence. It should be re-tested at the emerging threshold and percentage, before the rate is approved.

⁶ 4.2.19 Endurance Estates and Pigeon Representation (page 15)

⁷ Greater Cambridge CIL – Review of Representations (page 4)

⁸ Proposed Submission Greater Cambridge Local Plan 2024-2045 (page 643)

⁹ Greater Cambridge: Community Infrastructure Levy Viability Assessment (page12)

In light of the matters set out above and in the Consortium's Regulation 17 representation, the Consortium 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.

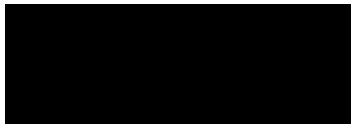
In particular, the Consortium considers that further evidence and/or testing is required in relation to:

- the residential typologies, including specialist retirement housing;
- residential sales values and their application across the typologies;
- the EUVs and BLVs adopted in the residential appraisals;
- the locational variation in office rents and yields; and
- the implications of emerging Local Plan requirements, including affordable workspace, for office and R&D viability.

The Consortium 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, the Consortium 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