



Greater Cambridge Draft CIL Charging Schedule 2026

CIL Hearing Statement

For Examination on 12 October 2026

On behalf of Prologis

2 October 2026

1. Introduction

- 1.1 Quod is writing on behalf of Prologis, the prospective developer of land known as Phases 3 and 4 at the Cambridge Biomedical Campus (the Campus).
- 1.2 As set out in our Representations submitted in March 2026, the Campus is recognised as Europe's leading centre for medical research and health science. Phase 3 extends to 9.3 ha and is allocated as an extension to the Campus in the South Cambridgeshire Local Plan 2018. Phase 4 extends to 25.8 ha and is currently in the Green Belt but is proposed to be allocated for a further expansion of the Campus in the emerging draft Greater Cambridge Local Plan.
- 1.3 Further details about the role and importance of this site to future growth and prosperity of Greater Cambridge, and our overarching views on the introduction of CIL and delivery of infrastructure, are included in those previous representations and are taken as read.
- 1.4 CBC is allocated for expansion under Policy S/CBC of the Draft Local Plan and growth is intended to deliver "a positive and meaningful contribution to the campus becoming a world leading healthcare, life-science and educational cluster."
- 1.5 Prologis supports the principle of CIL as the transparent and plan-led mechanism through which development can make a fair and proportionate contribution towards the strategic and cumulative infrastructure required to support planned growth. However, the Charging Schedule must be implemented in a way that does not undermine the delivery of the specialist life-science development upon which Cambridge's growth strategy depends. The most important way to do that in our view is to provide much greater clarity on the role of CIL; the timing and method of delivering the Strategic Transport Infrastructure it will fund (so it can be relied upon in investment decisions); and assurances that S106 will not "double dip" for that infrastructure.
- 1.6 This hearing statement is provided specifically to respond to Issue 2, Questions 1,2,4 and 5. We have no specific further comment to make on the remaining Issues and Questions.



2. Question 1: Is the evidence on strategic transport infrastructure requirements adequate and sufficiently up to date?

- 2.1 The proposed CIL rates have been identified by the GCP (in the Community Infrastructure Levy Infrastructure Statement) as necessary to deliver the strategic transport infrastructure relevant to the 2018 Local Plan.
- 2.2 While Prologis is in broad agreement with the extent and nature of the funding gap and infrastructure needs, they are concerned at the lack of explicit mention of CSET2 within the evidence base, given that CSET2 is the main project CIL receipts are proposed to be put towards.
- 2.3 The CSET Phase 2 extension is labelled as 'Critical Infrastructure' within table 5.1 in the Infrastructure Delivery Plan forming the Evidence base for the new emerging Local Plan. It is not listed however within the 2015 Infrastructure Delivery Statement that informed the 2018 Local plan, nor is it explicitly referred to in the 2014 Transport Strategy that informs the CIL Charging Schedule.
- 2.4 Given the critical importance of CSET Phase 2 for Cambridge Biomedical Campus' success its inclusion within the documents is of particular importance to Prologis.
- 2.5 CSET is critical to the functioning, accessibility and sustainable growth of the Campus and wider strategic developments. The delivery of planned life-science development and the delivery of enabling infrastructure are interdependent. The Local Plan's growth strategy cannot be regarded as fully deliverable unless there is a credible route to fund, phase and deliver CSET and the related infrastructure programme. We agree that CIL is the central mechanism for pooling contributions towards this infrastructure.
- 2.6 It is Prologis' worry that the potential misalignment of the introduction of CIL, a new local plan and wider changes to local planning in Cambridge could lead to overlaps and potentially inconsistent policies that risk uncertainty in the ability to deliver the campus expansion.
- 2.7 Prologis would request that explicit and clear reference be made to CSET2 as the main intended recipient within the supporting documents if the CIL charging schedule is to be introduced.
- 2.8 We would also request that the other inconsistencies and gaps between documents be resolved through updates in guidance and through the updated Local Plan process - and that CIL is explicitly listed as the source of funding for Strategic Transport Infrastructure in a revised Planning Obligations SPD. Further details on this point are set out in our response to Question 5.

3. Question 2: What is the timescale for implementation of projects and how is this intended to be achieved?

- 3.1 As the Inspector will be well aware, the legal test is whether:

14.—(1) In setting rates (including differential rates) in a charging schedule, a charging authority must aim to strike what appears to the charging authority to be an appropriate balance between—



- a. *the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and*
- b. *the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.*

4. The Statutory Guidance expands (emphasis added):

- 4.1 “This balance is at the centre of the charge-setting process. In meeting the regulatory requirements, charging authorities should be able to show and explain how their **proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area** (see regulation 14(1), as amended by the 2014 Regulations).
- 4.2 Prologis considers that the link between the levy and the implementation of the relevant plan is insufficiently clear. Given the complexity over the adopted and emerging plans, the recently adopted SPD (which does not set out the use of CIL for Strategic Transport) and evidence bases ranging in date from 2014 to today, there is currently insufficient clarity on CIL’s role in funding Strategic Transport Infrastructure to support strategic allocated sites, which we want to be made unequivocal.
- 4.3 While guidance does not require it, it suggests that, “Where practical, there are benefits to undertaking infrastructure planning for the purpose of plan making and setting the levy at the same time.” We agree that there would be significant benefits to that in the case of GCP.
- 4.4 If that is not practical at this time, a compromise would be an update to the SPD providing clarity on the link between the receipts of the CIL, delivery of CSET2 as the priority strategic transport infrastructure, the delivery of strategic sites under the new Local Plan and how this layering would work in practice.
- 4.5 At present, the inconsistency between documents and timelines creates uncertainty with respect to achieving the investment identified and uncertainty over the relationship between CIL and delivery of the emerging Local Plan in which Policy S/CBC is allocated as a Strategic Site.
- 4.6 It would be very helpful if, as part of the statutory Infrastructure Funding Statement publication every year if the following was presented to help provide clarity, certainty and market confidence:
 - The latest estimated cost and phasing of Strategic Transport interventions including CSET2.
 - Delivery mechanisms and delivery timing
 - The funding gap remaining after committed public funding and direct developer works.
 - The amount expected to be met through CIL.
 - Other funding sources, including Government transport bodies
 - The delivery body and target delivery date.



- The planned mechanism for forward funding infrastructure where CIL receipts are received only after development begins.

5. Question 4: What is the package of funding for this infrastructure and to what extent is it secured?

- 5.1 Prologis recognises the need for infrastructure in Cambridge and the large gap between the funding required and secured at this time. Save for the points made elsewhere in this statement, they are mainly in support of the introduction of the CIL charging schedule in order to deliver the Strategic Transport infrastructure needed to support development in line with the objectives of the levy.
- 5.2 However, the main concern is with the relation again to the “relevant plan” and CIL’s relationship to other obligations. CIL is inherently inflexible and therefore GCP will need to keep CIL under review alongside the emerging Local Plan. In our view it would be better to pre-empt that by having a clear commitment up front with respect to there being S106 obligation that will be imposed for Strategic Transport Infrastructure on Strategic Sites.

6. Question 5: How will the use of S106 contributions change following the introduction of the CILs? Will there be overlap between funding from S106 contributions and CIL for particular infrastructure projects or from particular development proposals?

- 6.1 When looking at the implication of introducing a CIL charging schedule alongside existing s106 requirements, it is instructive to look to London’s example. Mayoral CIL (MCIL1) was introduced in April 2012 entirely to fund the first stage of Crossrail (i.e. strategic infrastructure).
- 6.2 When the Mayoral CIL (MCIL1) was introduced, it was recognised that Section 106 within certain zones of London had also been contributing towards the cost of Crossrail since April 2010.
- 6.3 The blanket charges for MCIL1 across London meant that some developments were being hit twice for contributions to the same infrastructure, putting strain on their viability. This is referred to as ‘double dipping’ across much of the guidance.
- 6.4 As such, the (then) Department for Communities and Local Government released the Community Infrastructure Levy Guidance in April 2013. Paragraphs 84 to 91, state:

85. The Government expects charging authorities will work proactively with developers to ensure they are clear about charging authorities’ infrastructure needs and what developers will be expected to pay for through which route. This is so that there is no actual or perceived ‘double dipping’, with developers paying twice for the same item of infrastructure.

86. Regulation 123 of the Community Infrastructure Levy Regulations provides for charging authorities to set out a list of those projects or types of infrastructure that it intends to fund through they levy. This list should be based on the draft list that the charging authority prepared for the examination of their draft charging schedule.

- 6.5 *87. When a charging authority introduces the Community Infrastructure Levy, section 106 requirements should be scaled back to those matters that are directly related to a*



specific site and are not set out in a regulation 123 list. For transparency, charging authorities should have set out at examination how their section 106 policies will be varied, and the extent to which they have met their section 106 targets. Relevant local policy changes should be implemented at the same time that the charging schedule is introduced and integrated as soon as practical into the relevant Plan.

- 6.6 This is further supported by the Crossrail Funding SPG released in 2016, where the Mayor of London took the view that:

‘The best way of ensuring that developers do not have unreasonable demands made of them by having to make both CIL and section 106 payments towards Crossrail is to:

- treat CIL payments (which are effectively mandatory) as a credit towards any payment sought under the Crossrail S.106 planning obligations policy, should the former be less than the latter, and*
- not to seek a S.106 contribution at all should the obverse be the case.’*

- 6.7 Whilst Regulation 123 of the CIL Regulations has since been repealed to give greater flexibility to local authorities for pooled infrastructure projects, Regulation 122 remains strictly enforced to prevent unnecessary double dipping for larger infrastructure burden.

- 6.8 While Regulation 122 is specifically mentioned within the SPG, Prologis would request that clearer wording is put in place to reference the prohibition of double dipping, like that provided in the Crossrail Funding SPG.

- 6.9 The wording in the Greater Cambridge Planning Obligations SPG adopted in April 2026 regarding a future CIL currently states:

‘Any proposed CIL would complement rather than duplicate the obligations to be secured in a S106 agreement.’

- 6.10 Prologis would request that this wording be strengthened and other documents bring in wording similar to the effect of those set out in the Crossrail SPG, along the lines of:

6.10.1 To ensure the introduction of CIL complements existing S106 obligations and is compliant with Regulation 122, Strategic Sites allocated in the Local Plan will not make S106 payments towards Strategic Transport Infrastructure.

Prologis would be much more comfortable in their ability to deliver the next phases of CBC if this wording would be considered, alongside confirmation that CIL payments will be directed towards CSET2.

7. Summary

- 7.1 Prologis is overall in support of the introduction of CIL in the GCP area

- 7.2 We would like confirmation within the documentation that the main purpose of the CIL in the region will be to fund Strategic Transport Infrastructure explicitly including CSET2 as the documentation does not explicitly state this at the present.



- 7.3 We would also make a general request for greater clarity between the documents regarding CIL's introduction and other emerging planning documentation, such as the emerging Local Plan.
- 7.4 Prologis' concern is that the many changes in the planning system in the GCP area, including the emerging Local Plan, CIL charging schedule and the installation of the development corporation, could lead to inconsistencies and misalignments in policy that could lead to 'double dipping' or complex negotiations hindering development.
- 7.5 Double dipping would incur unreasonable additional costs for developers of Strategic Sites that are essential to Cambridge's future success. This will put additional strain on (and uncertainty over) deliverability in an economic climate where viability for many developments is already marginal.
- 7.6 We would request clarity across these emerging documents as to the approach to be taken and a provision to prevent double dipping, such as the ones that governed MCIL1 in London.
- 7.7 In practice, we would like confirmation that if CIL is introduced, there will be no s106 obligations on CBC to deliver Strategic Transport Infrastructure or CSET2 as this will be being funded by CIL instead.