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Date: 27 March 2026
Our ref: 63559/06/SC/JHy/40895381v6

Dear Sir/Madam

Greater Cambridge Draft Community Infrastructure Levy Consultation- Representation on behalf of Lolworth Developments Limited

We write on behalf of our client, Lolworth Developments Limited ('LDL'), a subsidiary of Salhia Real Estate, to make a representation to the Greater Cambridge Draft Community Infrastructure Levy Consultation, which runs until the 29 March 2026.

This follows LDL's representation to the Greater Cambridge Local Plan ('GCLP') in January 2026.

Specifically, we comment on the South Cambridgeshire District Council Draft Charging Schedule (January 2026), with consideration to the:

1. Greater Cambridge Infrastructure Statement (January 2026); and,
2. Greater Cambridge Viability Report (BNP Paribas, January 2026).

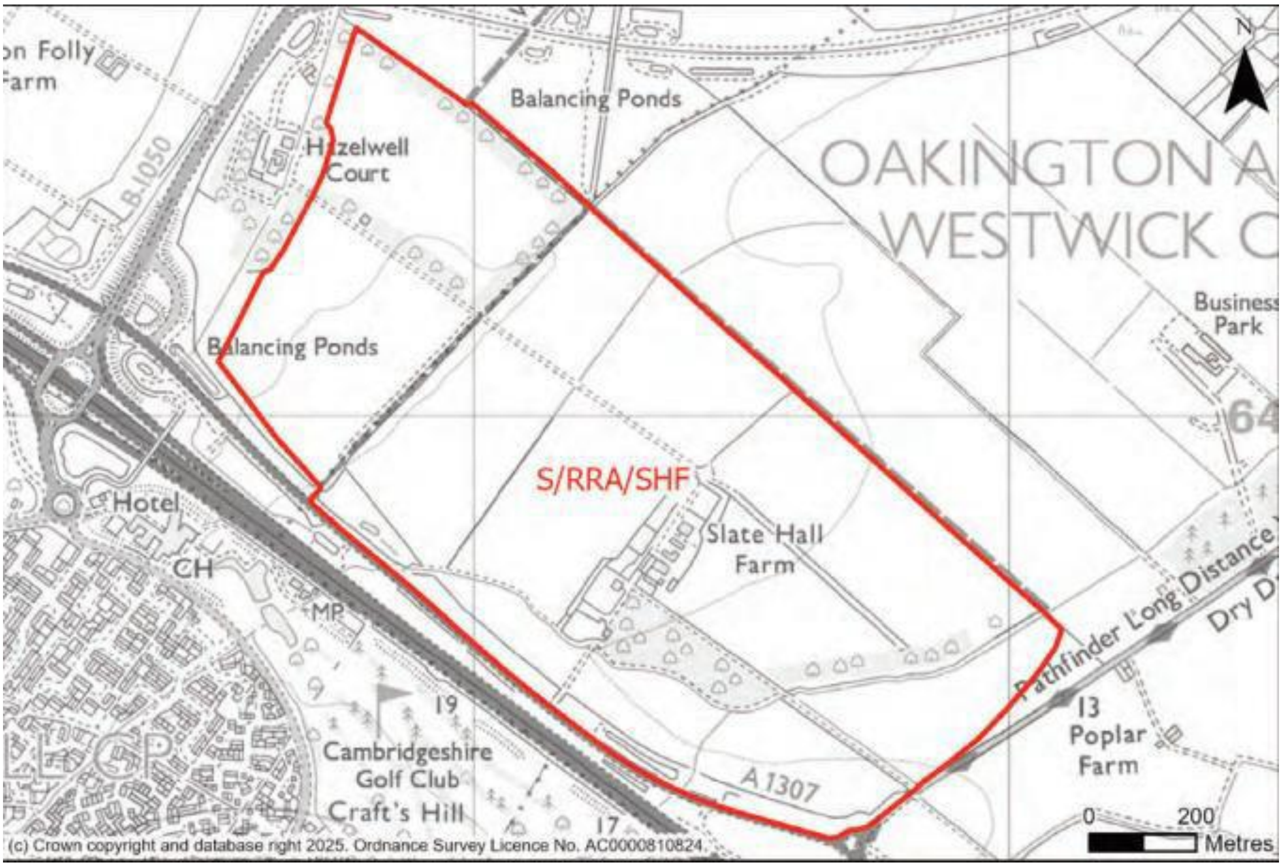
As requested, the representation is structured to respond to the consultation questions, and we have also submitted individual representations to each consultation question via Greater Cambridge's consultation portal.

Cambridge 25 and Policy S/SHF site allocation

LDL is actively promoting the Cambridge 25 site on the north side of the improved Junction 25 of the A14, opposite Bar Hill, for a sustainable employment park development with business and logistics capability and capacity. LDL has done so for the past 5+ years, and has an in depth knowledge of the site and local area.

The Cambridge 25 site forms the primary part of the proposed site allocation 'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)' in the draft GCLP for a major employment site of 240,000sqm of B2/B8 use. The Site Plan for the allocation is shown at Figure 1.

Figure 1 Site Plan of Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



Source: Draft GCLP Figure 109

In this context, the representations contained herewith relate primarily to the proposed rate of £35/sqm for Industrial Use B2 and B8 (including data centres) within the South Cambridgeshire District Council Draft Charging Schedule (January 2026).

Question 1: Who are you responding on behalf of?

Lolworth Developments Limited ('LDL'), a subsidiary of Salhia Real Estate.

Question 2: Do you wish to participate in the CIL Examination?

Yes.

Question 3: Do you agree that the Council should introduce CIL?

No.

LDL does not consider that it is appropriate or beneficial to introduce CIL Charging Schedules to help fund the Strategic Transport Infrastructure Needs identified in the evidence base for the adopted South Cambridgeshire District Council Local Plan and Cambridge City Council Local Plans, given that both

Local Plans are now 'out-of-date' for decision making (i.e. over 5 years old) and both plan periods end in 2031.

It is not clear from the evidence base what infrastructure is left to be delivered and the extent it can be delivered during the remainder of the Plan period.

It has not been explained in the consultation why the draft CIL schedule is being proposed in isolation to the GCLP, which is being brought forward at the same time and will have a significant impact on the funding and delivery of infrastructure.

Accordingly, LDL does not support the principle of preparing and introducing CIL Charging Schedules that relate to meeting the transport infrastructure needs of 'out of date' adopted Local Plans. It would be more appropriate for Greater Cambridge to prepare the CIL Charging Schedule and GCLP concurrently to meet current identified infrastructure needs (if identified), which would be in accordance with Planning Practice Guidance (para 25-012) which states that:

"Where practical, there are benefits to undertaking infrastructure planning for the purpose of plan making and setting the levy at the same time. A charging authority may use a draft plan if they are proposing a joint examination of their relevant plan and their levy charging schedule."

This appears to have been recognised by Greater Cambridge in the last consultation draft of the S106 Obligations SPD (August 2025)[1], which states that:

"The Councils are continuing to review whether a CIL should be introduced to support implementation and delivery of the Greater Cambridge Local Plan that is currently being developed. In the interim, s106 planning obligations will continue to be the primary mechanism used to secure community benefits." (Lichfields emphasis)

There is no evidence to date that the Councils has undertaken this exercise for CIL for the GCLP.

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

No.

Whilst we acknowledge that Greater Cambridge has identified an alleged funding gap in relation to its respective existing local plans, this is based on evidence and policy that is now over a decade old. Instead, and as set out above, CIL should be adopted alongside the emerging GCLP, due to be submitted this year, and utilising the up-to date evidence base in accordance with PPG para 25-012.

Funding Gap

With respect to the existing Local Plans, Table 10 of the Infrastructure Statement identifies a Gross Funding Gap of c.£272 million, to deliver strategic transport infrastructure.

[1] https://www.greatercambridgeplanning.org/media/b0tkmqzd/draft-greater-cambridge-planning-obligations-spd-track-change-version-august-2025.pdf

Figure 2 Gross Funding Gap

Funding Gap	Cost
Total Costs	£891,167,000
Total Income	£618,796,000
GROSS FUNDING GAP	**-£272,371,000**

Source: Table 10 of GC Infrastructure Statement

Section 6 of the Infrastructure Statement explains that the funding gap is primarily the result of the local contributions of Business Rates, New Homes Bonus, S106 contributions and CIL receipts not being as high as anticipated, as well as *"external factors, including considerable high inflation within the construction industry"*.

However, the Infrastructure Statement does not provide any information as to the continued need for the identified strategic transport infrastructure works and the extent to which any such need will be addressed in the emerging GCLP. The consequence of this is that the Councils have failed to consider the infrastructure funding and in-kind provision that will arise from planned development within the GCLP, including the draft allocations.

Further, it has not been evidenced what role the Cambridge Growth Company can play in meeting this funding gap. For example, the Cambridge Growth Company websites states that it will *"Coordinating investment and enabling infrastructure to accelerate progress on key stalled sites, including:*

1 £3 million to support a new model of emergency care and preparatory work for a future acute hospital at the Cambridge Biomedical Campus;

2 £23 million in recoverable funding (via Homes England) for the relocation of Waterbeach Station; and,

3 £7.2 million to advance the Cambridge South East Transport (CSET) project.

Fundamentally, our concern is that it has not been evidenced that this funding gap is accurate and has not already been fully or partially addressed via the emerging GCLP and Cambridge Growth Company.

Expected Funding from CIL

Chapters 8 and 9 of the Infrastructure Statement state that the proposed CIL will generate between £25m and £50m between adoption and the end of the adopted plan period (2031), based on anticipated growth within the area.

An income of £50m is assumed, however, this has not been substantiated aside from an assumption that more growth is expected than previous years, and should instead be evidenced to demonstrate it is realistic. Notwithstanding our concerns that this level of CIL revenue may not be generated by 2031, it is noted that even with the upper end of £50m by 2031 the CIL rates proposed would not meaningfully close the funding gap over the plan period as this would only equate to 18% of the identified funding gap.

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Figure 3 Net Funding Gap

Funding Gap	**Cost**
Funding Gap	£272,546,000
Net CIL Income	£50,000,000
NET FUNDING GAP	**-£222,546,000**

Source: Table 11 of the Greater Cambridge Infrastructure Statement

We therefore query the benefits to Greater Cambridge of introducing a CIL Charging Schedule with limited financial benefit as this would not make a significant contribution to the delivery of the infrastructure that is linked to the achievement of the growth aspirations for the Greater Cambridge area.

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

No.

We have reviewed the reasonableness of the key viability assumptions within the Greater Cambridgeshire: CIL Viability Assessment prepared by BNP Paribas (January 2026).

Viability Assumptions

With respect to the CIL viability tests for industrial development, three scenarios have been tested to reflect different typologies in respect of industrial and warehousing/logistics. All three scenarios are based on a hypothetical one hectare site with varying plot ratios, converting to an implied floorspace.

Table 1 Industrial Scenarios Tested

Scenario	Floorspace Equivalent	Assumed Rental Rate	CIL Rate
Industrial (40% plot ratio)	4,000 sqm	£195/sqm	£35/sqm
Warehousing/logistics (50% plot ratio)	5,000 sqm		
Warehousing/logistics (60% plot ratio)	6,000 sqm		

Source: BNP Paribas (2026)

A review of CoStar data has been undertaken to determine the profile of industrial stock throughout Greater Cambridge and test the reasonableness of the scenarios that have been tested. It can be seen from the evidence presented below that the stock of industrial premises throughout Greater Cambridge is varied, but that a significant proportion of units are of a smaller scale. There are 290 industrial premises of less than 1,000 sqm in Greater Cambridge. These account for almost half (44.5%) of the total number of premises but just 10.8% of total industrial floorspace. By contrast, there are just 35 larger industrial premises (in excess of 6,000 sqm); these account for almost half (45.7%) of total industrial floorspace but just 6.6% of the total number of industrial premises.

In proportionate terms, the range of floorspaces adopted within the CIL viability assessment modelling is reflective of just 5.8% of sites across Greater Cambridge (equivalent to 12.6% of overall floorspace).

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The scenarios tested are therefore not considered appropriate as they do not capture the full range of industrial premises in the Greater Cambridge area. The range adopted does not provide sufficient coverage to be representative of the varying scale of industrial typologies. It therefore does not reflect the interests of large-scale logistics developers/operators whose sites significantly exceed the upper threshold of the scenarios that have been tested.

Table 2 Cambridgeshire Industrial Stock

Site Band	Premises	Total sqm	% of Sites	% of Floorspace
<500 sqm	186	47,896	35.0%	4.1%
500-999 sqm	104	77,384	19.5%	6.7%
1,000-1,999 sqm	94	129,269	17.7%	11.2%
2,000-3,999 sqm	82	228,626	15.4%	19.0%
4,000-6,000 sqm*	31	145,990	5.8%	12.6%
6,000+ sqm	35	528,806	6.6%	45.7%
Total	**532**	**1,157,970**	**100%**	**100%**

Source: CoStar (2026) / Lichfields analysis/ * Floorspace range of CIL scenarios

The implication of this is that the three scenarios that have been tested by the Viability Appraisal do not provide a sufficient basis by which to understand the viability position for all manufacturing and warehousing premises and thereby to provide a robust basis by which the CIL rate can be fully tested. The consequence of this is that it is not possible to determine the viability implications of the identified CIL rate on a wide range of industrial premises, including large-scale logistics facilities.

In addition to our concern regarding the limited range of scenarios that have been tested, we would add that a plot ratio of 50% represents the maximum level stipulated in the Cambridge 25 design code. Application of a plot ratio in excess of this is not representative of the coverage that would be expected in the Greater Cambridge area. A The requirement for the achievement of 20% BNG in Cambridgeshire is likely to be require additional structural landscaping and Green Infrastructure which would put pressure on the achievement of that level of density. Applying plot ratios that exceed realistic expectations would result in an overstatement of the viability of development.

Input Assumptions

Build Costs

Table 4.11.1 of the Viability Appraisal sets out that Building Cost Information Service ('BCIS') data has been adopted in respect of build costs. We agree that this is an appropriate source of information. For industrial development the assessment adopts a base build cost of £978/sqm; this corresponds to the BCIS Category code 284 Warehouses/Stores with a Cambridgeshire locational adjustment. It should be noted that BCIS there are 50 sub-category codes which provide varying build costs for different types of industrial development. A review of the BCIS data with a Cambridgeshire locational adjustment highlights a significant range from £481/sqm (livestock buildings) up to £5,110/sqm (Data Centres). The average base build cost across this sample is £1,513/sqm or £1,358/sqm when data centres are omitted. These figures are between 39% and 55% higher than the figure that has been adopted by the Viability Appraisal.

The adoption of a blanket build cost is therefore not considered appropriate as it fails to capture the full range of industrial premises that are likely to be developed in Cambridgeshire. The Viability Review should be updated to reflect the more representative range of build costs set out above.

Externals

An allowance of 10% for externals has been adopted with respect to industrial development. This figure relates to the cost of providing external yards, car parking, footpaths, on plot access roads, landscaping and fencing and we are advised that a rate of between 15% and 20% represents a more typical figure for industrial development. Evidence for this figure is set out in a note prepared by KAM, which is included in Appendix 1. The rate that has been included in the modelling should be adjusted to reflect this.

Abnormal Costs

Paragraph 4.33 of the Viability Appraisal highlights that due to an absence of details of site investigations, it is not possible to achieve a reliable estimate of exceptional costs. The paragraph goes on to state that BCIS does account for some 'average' level of abnormal costs. This approach understates the reality of site-specific abnormal costs. Whilst BCIS does account for a baseline level of site works (standard foundations), these cannot be reasonable described as constituting "abnormal" costs. Critically, BCIS does not cover site-specific abnormal costs.

It is recognised that is difficult to provide a blanket assumption regarding site-specific abnormal costs and that every site is different. However, we are advised by KAM that abnormal can typically be in the order 20% of base build costs. However, on an Industrial Park scheme such as Cambridge 25, the abnormal costs could represent an even greater proportion of build costs as there can be significant infrastructure costs – including, but not limited to highways, utilities, ecology, and groundworks.

A failure to have adequate regard for this potentially significant cost component is that the costs of development may be significantly under-estimated, resulting in the viability position being over-stated. We would recommend that the viability modelling should be revised with an appropriate allowance for abnormal costs.

Contingency

It is common practice to include a contingency allowance to account for unforeseen costs that arise throughout the development period. The study does not appear to provide an allowance for contingency and therefore is likely to underestimate the true cost of development. A rate of 10% represents a typical allowance for contingency.

The inclusion of contingency costs is particularly relevant in the current economic context. In the period 2021 to 2026, developers have had to account for an exponential and unexpected increase in build costs of c.20% between October 2021 and 2025. Given that current geo-political uncertainties have the potential to result in further increases in inflation and interest rates, it is more important than ever to ensure that sufficient flexibility is built into the viability modelling that underpins the CIL charging schedule. There can be no justification for the exclusion of an allowance for contingency and we would recommend that the viability modelling should be revised with an allowance of at least 10% of total build costs applied in respect of contingency.

Given the absence of any allowance for abnormal costs, the importance of an adequate contingency allowance becomes even more significant. The failure to make any such provision results in a lack of flexibility within the viability modelling which further under-estimates development costs and over-states the viability position. This might result in a conclusion being reached as to the level of CIL that cannot be sustained in practice.

Professional fees

The CIL viability assessment includes an allowance of 7% base build costs to cover professional fees. It describes this as being *"at the middle to higher end of the range for most schemes." This* conclusion is predicated on the assumption that a single figure would be appropriate for all development proposals. We are advised that a figure of c.15% would be more appropriate for strategic industrial development and recommend that the viability modelling should be revised on this basis.

Rental Values and Yields Rates

The CIL viability assessment applies an average commercial rent assumption of £195/sqm across all forms of industrial development. A review of CoStar data comprising 546 industrial units[2] throughout Greater Cambridge identifies a significant range of actual rental values from £54.03/sqm up to £592.02/sqm[3]. Across the sample of premises with actual rental rates provided, an average rental rate of £144.87/sqm is identified. This figure drops to £128.30/sqm for premises identified as 'Warehouse' typologies. This is important in highlighting the significant variation in rental levels for different types of industrial property. Given the range of premises that would fall within the CIL rate within the category of 'Industrial use (B2/B8) including data centres' it is neither possible nor appropriate to apply a single rental value. Moreover, the rental figure of £195/sqm that has been applied is disproportionately high when compared to the average for Greater Cambridge.

In addition to rental values varying by type of premise, Table 3 also reveals a geographical variation, with average rental values ranging from £82.14 in the CB3 postcode are to £153.36/sqm in the CB1 area. All of the figures identified are below the average rate that was applied in the CIL Viability Review. The Cambridge 25 site is located in the CB24 postcode area, within which average rents are shown to be £123,41/sqm. This is below both the median and mean of all postcode areas and is 37% lower than the figure that was applied in the Viability Review.

Another core assumption within the viability assessment modelling is an assumed yield rate of 5.0%. An analysis of CoStar industrial market asking rents and yield rates across the constituent postcode districts throughout Cambridgeshire is represented below. This highlights that across the stock of industrial premises an average yield rate of 7.08% is achieved. It is also evident that the yield rates in every postcode district are higher than the 5.0% adopted within modelling, whilst market rents are lower across all areas. Applying a lower yield rate artificially inflates the Gross Development Value, overstating the viability position of schemes. Taken together, both factors would worsen the viability position across industrial development relative to the adopted assumptions.

2 CoStar 'Industrial' category includes both B2 and B8 Use Classes

3 Values range from high-tech light industrial in the Cambridge Core to lower value light industrial in Outer Cambridge

Table 3 Postcode district Yield and Market Rent (£/psm)

Postcode District	Yield	Market Rent (£/psm)
CB1	7.40%	£153.36
CB2	7.00%	£152.79
CB3	7.70%	£82.14
CB4	6.50%	£145.69
CB5	7.20%	£145.83
CB21	6.90%	£131.03
CB22	6.90%	£121.16
CB23	7.10%	£116.77
CB24	7.00%	£123.41

Source: CoStar (2026)

As above, the adoption of a blanket rental value and market yield within the CIL viability assessment is not appropriate or reflective of the Cambridgeshire market and its sub-areas.

Bidwells has provided information that an appropriate average rental range would be between £130/sqm and £135/sqm for new build storage and distribution units in Greater Cambridge. This is between 30% and 33% below the figure set out in the Viability Review.

The impact of these differences to can be understood through a review of the property value of each rental value/yield combination:

1 A rental income of £195/sqm and a 5% gross yield would generate a property value of **£3,900/sqm.**

2 By contrast, a rental income of £135/sqm and a 7.08% gross yield would generate a property value of **£1,906.78/sqm** – this is less than half the level associated with the figures contained in the Council's Viability Review**.**

We would therefore recommend that further testing should be undertaken to reflect more appropriate rental values and yield assumptions, and to have regard to the differences in rental values by type of premises and area.

Viability Test

Notwithstanding our concerns relating to the assumptions adopted within the CIL viability assessment as set out above, the CIL viability assessments' own evidence identifies that CIL charging would only be appropriate to industrial development on greenfield sites (BLV3 and BLV4). Should the assumptions be revised to reflect actual market rental rates, yields and build costs this would worsen the viability position across all BLV scenarios and would hinder the ability to contribute CIL across all scenarios.

Table 4 Viability Scenarios (Industrial)

No.	Description	BLV1	BLV2	BLV3	BLV4
1.	Industrial (40% plot ratio)	Unviable	Unviable	Viable	Viable
2.	Warehousing/logistics (50% plot ratio)	Unviable	Unviable	Viable	Viable

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No.	Description	BLV1	BLV2	BLV3	BLV4
3.	Warehousing/logistics (60% plot ratio)	Unviable	Unviable	Viable	Viable

Source: BNP Paribas (2026)

Summary

In summary, the CIL viability assessment:

1 Is tested on a very limited range of scenarios which are not reflective of Cambridgeshire's stock of industrial premises;

2 Adopts a single build cost assumption that is lower than the BCIS build costs across many types of industrial development;

3 Fails to have regard to other costs including abnormal costs or provide an allowance for contingency;

4 Applies a single rental value of £195/sqm which fails to reflect the range of values associated with different types of industrial premises and is higher than actual rental values commanded across Cambridgeshire as a whole as well as each of the individual constituent postcode districts;

5 Adopts a single market yield assumption of 5% which is lower than the actual yield achieved across Cambridgeshire's industrial stock; and,

6 Identifies that CIL charging is only viable on greenfield sites under its own testing parameters.

This analysis demonstrates that the identified CIL rate cannot be justified. As a minimum, further testing is required in order to consider the impact of the changes to the various inputs that we have identified above. We believe that this will render the application of any CIL in respect of industrial development in Greater Cambridge to be unviable.

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?

No. Please see our response to Question 5.

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

No.

There appears to be a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations SPD ("the SPD"), which has been approved by South Cambridgeshire Council (3 February 2026) and Cambridge City Council Cabinet (24 March 2026) and will be adopted imminently.

It is firstly noted that the SPD does not reference the draft CIL Charging Schedule, instead stating at paragraph 1.21 that one may be prepared in the future; this is despite both the S106 Obligations SPD and CIL Charging Schedule being considered at the same Cabinet meeting on the 3 February 2026.

"The Councils are continuing to review whether a CIL should be introduced to support sustainable development in Greater Cambridge. Any proposed CIL would complement rather than duplicate the obligations to be secured in a S106 agreement."

We are concerned that as a result of this lack of clarity there is potential for double counting of S106 contributions and CIL funding towards 'Strategic Transport Infrastructure'.

We would suggest this is resolved by updating the Planning Obligations SPD prior to adoption to include reference to the below documents:

SCDC Cabinet Report (3 February 2026)- paragraph 49:

"The primary purpose of introducing a CIL is to ensure that strategic transport infrastructure identified in the TSCSC are delivered which will result in improvements to sustainable travel choices including reducing car dependency and the resulting emissions."

Infrastructure Statement (page 5):

"CIL would be used alongside Section 106 planning obligations which are negotiated agreements used to mitigate the impact of development and will continue to be secured towards localised community infrastructure including schools, libraries, doctors surgeries, village halls, play areas, allotments etc."

Without this and given the lack of coordination or reference to the CIL Charging Schedule within the soon to be adopted Planning Obligations SPD, LDL considers that if a CIL is adopted in Greater Cambridge, the SPD would need to be withdrawn and replaced with a Supplementary Plan under the new plan-making system. Such a plan would be subject to examination at which it would be appropriately considered against relevant policies (likely to be those within the GCLP), funding context, and any existing CIL at that time.

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

No comment.

Question 9: Do you agree that the Council has met all regulatory requirements?

No.

The Planning Act 2008 (as amended) and the Community Infrastructure Levy Regulations 2010 (as amended) ('the CIL Regulations') provide the legislative context for the preparation of a CIL charging schedule.

Given that a number of the preceding questions within this consultation pose similar questions to those raised within relevant legislation, LDL uses its response to this question to summarise points already made, with reference to elements of the regulatory requirements which have not been met.

Planning Act

Part 11 of The Planning Act 2008 (as amended) states at section 211(2):

“(2) A charging authority, in setting rates or other criteria, must have regard, to the extent and in the manner specified by CIL regulations, to-

“(a) actual and expected costs of infrastructure (whether by reference to lists prepared by virtue of section 216(5)(a) or otherwise);

“(b) matters specified by CIL regulations relating to the economic viability of development (which may include, in particular, actual or potential economic effects of planning permission or of the imposition of CIL);

“(c) other actual and expected sources of funding for infrastructure”

At s211 (7(A)), it says:

“(7A) A charging authority must use appropriate available evidence to inform the charging authority's preparation of a charging schedule.”

CIL Regulations

Regulation 14 of the CIL Regulations, allowed for within the Planning Act 2008, states:

“14. - Setting rates

“(1) In setting rates (including differential rates) in a charging schedule, a charging authority must strike 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.

“(2) In setting rates in a charging schedule, a charging authority may also have regard to actual and expected administrative expenses in connection with CIL to the extent that those expenses can be funded from CIL in accordance with regulation 61…”

Assessment against relevant regulatory requirements

With reference to s211 (7(A)) of the Planning Act, LDL’s response to Question 3 of this consultation demonstrates that the Councils have not used appropriate available evidence to inform the preparation of their Draft Charging Schedules. This is because the proposed Greater Cambridge CIL would be based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. The fact that the Viability Review is conducted with regard to the policies within the draft (regulation 18) Greater Cambridge Local Plan whilst the Infrastructure Statement and CIL supporting statement do not reference the draft Greater Cambridge Local Plan further demonstrates that the evidence used by the Councils cannot be considered “appropriate” in accordance with s211 (7(A)) of the Planning Act.

With reference to regulation 14(1)(a) of the CIL regulations, it is not considered that the Councils have effectively considered the actual and expected costs of infrastructure, nor have they appropriately taken

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into account other actual and expected sources of funding. The Councils have failed to consider the real-world development landscape within Cambridge by not assessing the effects of the Greater Cambridge Local Plan, the CGC, and the Cambridge City Deal, on infrastructure delivery. Moreover, the Councils have not sufficiently considered the desirability of funding infrastructure from CIL alongside the in-kind and financial contributions that will be made from other sources of funding.

With reference to regulation 14(1)(b), it is not considered that the councils have taken a robust approach to establishing the effects of the Draft Charging Schedules on development viability. A lack of comprehensive testing, failure to account for the stark differences in sales values across Greater Cambridge, and inadequate input assumptions to the Viability Review, mean that the approach to viability testing is not robust. This is in addition to our concern that the Viability Review has been conducted with reference to policies within the regulation 18 Greater Cambridge Local Plan, which are by definition subject to change over the course of the plan-making process.

Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?

No comment.

This question only relates to the Cambridge City Council Draft CIL Charging Schedule.

Concluding Remarks

As set out in these representations, we are concerned that the proposed CIL rate of £35/sqm CIL rate for 'Industrial use (B2/B8) including data centres' is not adequately justified and is not likely to be viable. The implication of this is that it could threaten the delivery of development which would contribute to the growth aspirations for the Greater Cambridge area. As well as undermining the economic prosperity of the area, this would also result in CIL receipts being lower than expected such that the identified funding gap would be even greater than anticipated. This could threaten the delivery of the strategic transport infrastructure which is required to support future development – potentially resulting in the area becoming less attractive to investment and development, and creating a negative feedback loop in terms of further reduced CIL receipts and less money being available to fund infrastructure provision.

We trust that our representations assist you to re-consider the need for a £35/sqm CIL rate for 'Industrial use (B2/B8) including data centres' and look forward to participating in the Examination in Public, as necessary. We would be happy to discuss any aspect with you, should that assist.

Yours faithfully

[redacted]

Simon Coop
Senior Director
BA (Hons) MSc MRTPI MIED

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Enclosures	Evidence of costs prepared by KAM (Appendix 1) Evidence of rental values prepared by Bidwells (Appendix 2)

Annex 1: Evidence of Costs, prepared by KAM

Joshua Hymer

From: Phil Wiese <PhilW@kampcl.com>
Date: Friday, 27 March 2026 at 09:53

Hi Graeme

Thank you for sharing the above document prepared by BNP Paribas for Greater Cambridge use in assessing the viability and appropriateness of CIL for different use classes.

I have reviewed the above in the context of the assumptions made in relation to B2B8 storage and warehousing uses.

As both Cost and Project Managers with extensive experience in the delivery of such Projects we believe we are well placed to comment on the assumptions made and would comment a follows:

- **External Works -** the report assumes an additional cost of 10% of the Base Build Cost for external works. In our experience the external works which would cover; external yards, car parking, footpaths, on plot access roads, landscaping and fencing etc, and would be much closer to 15-20% of the base build value, our internal benchmarking collected over 12+ years is consistent with this.
- **Abnormals** - we understand that no specific allowance has been made for Project Abnormals. In our experience this massively underestimates the costs of delivering these types of Projects which will involve significant packages of work, typically including; earthworks/cut and fill, ground improvement (vibro stone columns, dynamic compaction, piling etc.), surface water attenuation, site retaining walls, utility disconnections/diversions/new connections, infrastructure & Highways works etc., on this basis we would suggest a more appropriate figure of at least 20%.
- **Contingency** - we understand that no contingency allowance has been included. In our experience all project appraisals need to carry a minimum of 10% on Build Costs as a construction contingency and a further 5% as a development contingency.
- **Professional Fees** - we understand the assumptions include an allowance of 7% of the Build Costs for Professional Fees. We consider an appropriate rate to be double this as a minimum, i.e. 15% of the Build Costs.

As evidenced above in our professional opinion we consider that the allowances for Professional Fees and External Works have been significantly under represented and that the Appraisal assumptions need to include a significant additional allowance for Abnormals, Contingency and Professional Fees.

Kind Regards

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Annex 2: Evidence of Rental Values, prepared by Bidwells

Joshua Hymer

From: Walter Scott <Walter.Scott@bidwells.co.uk>
Date: Friday, 27 March 2026 at 09:59

Dear Graeme

Re: Greater Cambridge Community Infrastructure Levy Viability Assessment- produced by BNP Paribas in January 2026

I understand that the BNP Paribas Report referenced above includes an assessment of B2B8 Storage and Warehousing Rents at a level of £195 sq m or £18 psf.

In our experience this is grossly overstating the levels of rents that would be achievable for new build storage and distribution units in Greater Cambridge.

In our opinion a more appropriate average rental would be in the region of £130 sq m to £135 sq m.

I hope this is of assistance.

Regards
Walter

BIDWELLS

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