Cambridge Growth Company

To

Greater Cambridge Shared Planning

Cambridge City Council
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South Cambridgeshire District Council
South Cambridgeshire Hall
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Date 1 May 2026

Subject **Community Infrastructure Levy Consultation for Cambridge City Council and South Cambridgeshire District Council**

Thank you for the opportunity to comment on the proposed charging schedules for Cambridge City and South Cambridge councils draft CIL Charging schedules. Cambridge Growth Company (CGC) has been established by government in 2024 to address the barriers to growth and help unlock Greater Cambridge's full potential. As a subsidiary of Homes England, the government's housing and regeneration agency, the CGC works to unlock and accelerate development and deliver the homes, jobs and infrastructure needed for long-term, sustainable growth.

As you will be aware Government is currently consulting on a proposed Cambridge Development Corporation and its prospective powers and responsibilities and the outcome of this will be known later this year. CGC supports the proposal to introduce a CIL charge within both Councils geographic areas as an important funding tool to deliver necessary infrastructure, alongside other funding and delivery sources. It is noted that the draft charging rates have been kept low to enable flexibility in the use of CIL and S106 to achieve an optimal approach to infrastructure delivery and this approach supported.

It is noted that the charges are supported by a viability assessment, dated January 2026, which concludes that the proposed CIL rates would have an impact that "remains at an acceptably low level in most cases". As there is a need to ensure that development delivery is accelerated, this is welcome. However, it is also noted that there is a potential now for significant economic headwinds to increase delivery challenges going forward. While data may not be available for inclusion in the testing that reflects this, it is considered that it would be worthwhile reviewing the conclusions of the study in respect of this to ensure that Its conclusions remains broadly correct. To ensure that the rates continue to strike a good balance between achieving funding for infrastructure and encouraging delivery of development, it may be necessary to undertake an early review following the CIL charge coming into effect.

It is noted that evidence for an infrastructure funding gap has been presented in an infrastructure funding statement and that this gap is focused on highways and other transport infrastructure rather than a wider infrastructure funding gap. It is noted that the supporting infrastructure study was concluded in 2015 and while this specifically supports the current, adopted Local Plan to which the draft charging schedules relate, the additional growth proposals in the emerging new Local Plan, and other emerging additional growth ambitions, will require further infrastructure support and funding with a further potential funding gap to be met from available sources.

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With CGC's infrastructure related remit, the need for collaboration to maximise the effectiveness of this in developing a future infrastructure evidence base that reflects the current and future growth ambitions will be important. This and other circumstances may well justify an early review of the CIL charges to ensure that these and the strategy for applying them are optimised and allow for effective use alongside S106 and other funding streams. In this context, we would be open to exploring the potential for a CIL income sharing agreement in due course. Working together to coordinate and focus funding of infrastructure and achieving its delivery will be an important focus for our respective organisations and I look forward to working with Cambridge Joint Planning Service on that.

Ensuring that strategic sites deliver infrastructure in an effective and timely way is important and will require a clear approach in charging and applying CIL and the use of S106 Agreements. CGC is aware that some development promoters are of the view that strategic sites should be nil rated for CIL purposes with infrastructure provision and contributions secured only via S106. CGC is of the view that CIL should continue to apply to strategic sites but that specific CIL policy tools should be used to ensure infrastructure delivery related to them is as effective as possible. In particular, the use of land and infrastructure payments in kind would be more effective than removing CIL liability.

It is noted that no specific CIL policies are proposed aside from that for CIL payment instalments. It is suggested that a policy is published to allow CIL infrastructure payments in kind to be available to allow direct delivery of relevant infrastructure by the developer in accordance with Regulation 73 and 73A of the CIL Regulations. Allowing CIL payment in kind for land for infrastructure and for direct delivery of infrastructure on strategic sites will encourage early infrastructure delivery within schemes, taking into account the relevant cost to developer in doing so.

In summary, CGC welcomes the proposed CIL charging proposals set out in the consultation but also highlights the need for these and the infrastructure evidence and the related infrastructure delivery approach to continue to be developed to reflect current and emerging growth proposals for Greater Cambridge. The work currently being developed by CGC on this will be important in informing this approach and helping to ensure use of CIL and other funds are directed effectively in support of this. I look forward to collaborative working on this over time.

Yours sincerely,

Anthony Hollingsworth
Director of Planning and Place