



Cambridge City Council Cabinet

Date: Tuesday, 7 July 2026

Time: 5.00 pm

Venue: Meadows Community Centre, Room 1, 299 Arbury Rd, Cambridge CB4 2JL

Contact: democratic.services@cambridge.gov.uk, tel:01223 457000

Agenda

This meeting is open to any member of the Council who wishes to ask questions of the Executive on items included on this agenda. Could members please notify the Committee Manager if they wish to attend and speak.

- 1 Apologies
- 2 Declarations of Interest
- 3 Minutes (Pages 5 - 28)
- 4 Public Questions
- 5 Budget Setting Context 2027-28 (Pages 29 - 38)
- 6 Homelessness and Rough Sleeping Strategy 2021 – 2028 (Pages 39 - 218)
- 7 New Sites Development and Homes England update (Pages 219 - 252)
- 8 Reopening of Parker's Piece and Quayside public toilets (Pages 253 - 270)
The report on this agenda item will also cover items 9 & 10.
- 9 Improvements to Street Cleaning
This agenda item will be covered in the report on Item 8.
- 10 Improving Public Safety and Environmental Enforcement
This agenda item will be covered in the report on Item 8.
- 11 Community Infrastructure Levy (Pages 271 -

600)

12	Fleet Decarbonisation and Replacement Project.	(Pages 601 - 622)
13	Quarterly Performance Report January to March 2026	(Pages 623 - 706)

Cabinet Members: Thornburrow (Chair), Moore (Vice-Chair), Smart (Cabinet Member), Todd-Jones (Cabinet Member), Bird (Cabinet Member), Gawthorpe Wood (Cabinet Member) and Nestor (Cabinet Member)

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Further information on public speaking will be supplied once registration and the written question / statement has been received.

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CABINET

24 March 2026

5.00 - 8.03 pm

Present: Councillors Holloway (Chair), Wade (Vice-Chair), Bird, Moore, Nestor, Smart, A. Smith, S. Smith and Todd-Jones

Other Councillors present:

Councillors Bick, Porrer and Young

Also present (virtually) Councillors Bennett and Clough

Officers Present:

Chief Executive: Robert Pollock

Chief Operating Officer: Jane Wison

Chief Finance Officer: Jody Etherington

Joint Director of Planning and Economic Development: Stephen Kelly

Director of Economy & Place: Lynne Miles

Communities Director: Sam Scharf

Assistant Director Development: Ben Binns

Assistant Director Public Realm & Environment: Alistair Wilson

Head of Economy, Energy and Climate: Jemma Little

Inclusive Economy and Climate Manager: David Wright

Senior Development Manager: Jaques van der Vyver

Senior Policy Planner: Mark Deas

Planning Policy Manager: Jonathan Dixon

Planning Policy and Strategy Team Leader: Lauren Wilkinson

Climate Change Officer: Catherine Oakley

Climate Change Officer: Janet Fogg

Arboricultural consultant: Joanna Davies

Democratic Services Manager: Dan Kalley

Deputy Democratic Services Manager: Claire Tunnicliffe

FOR THE INFORMATION OF THE COUNCIL**26/16/Cab Apologies**

Apologies were received from Councillor Thornburrow.

26/17/Cab Declarations of Interest

Name	Item	Reason
Councillor A Smith	26/23/Cab	Personal: Member of the Friends of Cherry Hinton Brook

Councillor S Smith	26/29/Cab	Personal: Chair of the Greater Cambridge Partnership Joint Assembly

26/18/Cab Minutes of the meeting held on 10 February 2026

The minutes of the meeting held on 10 February 2026 were approved as a correct record and signed by the Chair.

26/19/Cab Public Questions

Question 1:

- i. On 5th September 2022 Arbury Court Shopping Centre was nominated for inclusion on the County Council's Local Heritage List. Later that month an assessment panel of Conservation and Historic Environment Officers reviewed the nomination and determined that it had achieved a sufficiently high score against the local listing criteria for it to be taken forward for adoption by the City Council (a process which is delegated to the Greater Cambridge Shared Planning Service).
- ii. Could the Director of Planning or the Executive Councillor explain why, more than three years later, the findings of the assessment panel have not yet been ratified by granting Local Heritage Listing?

The Joint Director of Planning and Economic Development responded with the following:

- i. There had been a delay in considering the request whilst third party representations were considered but had recently met with the Conservation Officers to review the request and anticipated making a decision on the matter shortly.
- ii. As a result of those discussions, was now in the process of issuing a decision on the matter and expected to reach a view shortly.

Supplementary Question

- i. Had received an e-mail two weeks earlier from the 3C Shared Services Information Team stating that a decision would be made by Friday the 20th, that decision had still not been issued.
- ii. Had been unable to locate any publicly searchable background information about the representations submitted for or against the matter.
- iii. Requested whether there were anywhere these representations could be viewed and whether there was any transparency around them.
- iv. When would the decision be made, they and where it would be published once made.

The Joint Director of Planning and Economic Development said:

- i. Representations were not normally published in relation to nominations. Subject to checking whether any redactions were required, would look to see if the comments received could be available.
- ii. The scoring matrix was one adopted by the County Council and was applied consistently across the Cambridge area.
- iii. Had anticipated making the decision by 20 March 2026 but had wished to review additional information. A decision was now expected within the coming week.
- iv. Confirmed that a written notification would be provided to the public speaker once the decision had been made.

Question 2:

- i. Previously at Full Council (November 2025) and in other statements, the Council had confirmed that the present plan-configuration for the North Cambridge Development of Arbury Court, Brackley Close and Kingsway Flats and, in particular, Arbury Court, was not immutable or set in concrete. Would the Council please confirm this by indicating:
 - A. What and how many redesigns or alternative designs would be presented for community consideration before any proposal went to Planning;
 - B. That the density of housing in the North Cambridge Development would be spread across Brackley Close, Kingsway Flats and Arbury Court consistent with the footprint, capacity for housing build and surrounding landscape/area so that no part of the Development was disproportionately impacted, whilst retaining the level of build (that is, housing - plus shops) as required for ensuring council housing levels were consistent with the Council's building programme; and
 - C. That to provide greater potential for this spread of density, would the Council give consideration to including Brackley Close Flats in the plan, in addition to the planned Brackley Close Maisonettes.

The Cabinet Member for Housing said the following in response:

- i. The feedback from the last consultation showed that 61% of those people who had responded were in favour of redevelopment.
- ii. With regards to question A, the Council had on record they would undertake a further consultation in the summer before a planning submission in the Autumn.
- iii. Regarding question B, there were a number of constraints and opportunities that the Council needed to consider, and Officers would work with the planners to find an appropriate development proposal that

would be supported by the planners and would respond to the consultation feedback.

- iv. It was not appropriate to answer question C, without considering the residents in the first instance. If Officers thought there was a case for extending the red line boundary, residents directly impacted would be informed first before this was discussed in public

Supplementary Question

- i. Across Cambridge there were signs stating that ball games were not allowed. When the alternative designs were brought forward would those designs include an option that retained the play park in its current location, preserving the green space where ball games could be played?
- ii. It was also important that a paved courtyard was provided, as would allow children to sing carols during the winter months without standing on wet grass. In addition, a paved area would improve accessibility for wheelchair users, as well as for prams and buggies.
- iii. Would one of the alternative proposals include both the retention of the existing grass area and the provision of a paved courtyard?

The Cabinet Member for Housing said the following:

- i. Currently there were no plans in place, when ready the Council would make sure that everyone was informed.
- ii. Was aware that some parks did display “no ball games” signs, but this varied from park to park. Could not say at this stage whether such a sign would be put up, but the information would be shared once available.

Question 3:

- i. Had been told that alternative options for the Arbury Court Development were being considered. However, what are the plans for developing these and how, and when, would there be a consultation with the public about these. Would there be options that keep the current park?

The Cabinet Member for Housing said the following:

- i. Early development proposals at Arbury had been shared and the engagement report has been published.
- ii. Officers were working through the feedback, undertaking surveys, and working with planning colleagues to review next steps, which took time to ensure it was properly completed.
- iii. Had gone on record that that the Council would consult on updated designs before a planning submission. The strong feedback on the park along with the support for redevelopment has been noted in the engagement report.

26/20/Cab Draft Greater Cambridge Planning Obligations Supplementary Planning Document Adoption

The Deputy Leader introduced the report.

The report referred to the draft Greater Cambridge Planning Obligations Supplementary Planning Document (SPD), which once adopted would be a material consideration in the determination of planning Page 17 applications. The SPD would support the Council in securing infrastructure necessary to provide for the needs generated by new development. It would also improve the process of negotiating, preparing and completing a S106 agreement.

In response to questions from Cabinet Members and those Councillors present, the Leader and the Joint Director for Planning and Economic Development said the following:

- i. Noted the comment by the Cabinet Member for Safety, Wellbeing and Tackling Homelessness regarding the Health Scrutiny Committee meeting with representatives from primary care and the Integrated Care Board. It had been confirmed that developer contributions and Section 106 funding for both physical infrastructure and primary care services required a more strategic, coordinated approach. The Board's representatives indicated they were willing to meet with the Planning Service to explore options. Highlighted the relevance of this issue given the scale of local development.
- ii. Welcomed the comments made by Councillor Porrer that she was supportive of the SPD.
- iii. The SPD cross-referenced the Housing Strategy; the Housing Strategy was not before Cabinet at this meeting.
- iv. Noted that the overall approach to housing tenure mix and split was interpreted by the Housing Team on a case-by-case basis, taking account of site characteristics, location, and suitability for different uses.
- v. The SPD signposted that decisions on tenure and affordable housing rates were determined through the joint Housing Strategy prepared with South Cambridgeshire District Council, and reflected the approach set out.
- vi. It was shown on the Housing Strategy, 25% of homes on sites of 10–14 dwellings were required to be affordable, rising to 40% on sites of 15 or more dwellings. This was provided as a helpful reference point.
- vii. Important to highlight the City Council's strong record of delivering new social housing, noting that approximately 700 new council homes had been built over the past eight years, with plans for a further 1,300 over the next ten years

Cabinet **unanimously resolved** to:

- i. Agree the draft Greater Cambridge Planning Obligations SPD (attached at Appendix 1 of the Officer's report) and accompanying Equalities Impact Assessment (EqIA) (Appendix 2) are formally adopted subject to any changes following the Cambridge City Council Cabinet.
- ii. Agree that any subsequent material amendments following the SPD's adoption to be made by the Cabinet Member for Planning and Transport, and that any subsequent minor amendments and editing changes that do not materially affect the content prior to consultation be delegated to the Joint Director of Planning in consultation with the Cabinet Member for Planning and Transport.

26/21/Cab Climate Change Strategy

The Cabinet Member for Climate Action and Environment introduced the report.

The report referred to the new Climate Change Strategy which built upon the previous strategy and progress to date and takes account of changes in national policy and context. It also set out how the Council plan to work towards its net zero vision for the city and net zero target for the Council by 2030; and to deliver the associated benefits of improved health, wellbeing, and livelihoods for current and future generations.

In response to questions from Cabinet Members and those Councillors present, the Cabinet Member for Climate Action and Environment said the following:

- i. Welcomed the comment highlighting that the work that was being with community groups; collaborative work with community groups had significantly increased.
- ii. The former single group, Cambridge Climate Leaders, had been divided into two groups, Cambridge Climate Leaders demonstrated clear action-focused outcomes. The Cambridge Climate Forum, comprising community groups across the city worked on environmental issues which was an invaluable resource for the City Council. The intention was to strengthen this partnership further, to ensure it became a strategy for the whole city rather than solely for the City Council.
- iii. Noted the following comments made by the Chair of the Services, Climate and Communities Overview and Scrutiny Committee;

- The Member stated that the Committee fully recognised the importance of climate change. There had been some concern about the deliverability of the strategy should major projects, such as the city centre heat network and the Civic Quarter scheme not proceed, given the scale and ambition of these initiatives.
 - The Committee also highlighted that the City Council's own emissions represented only a small proportion of citywide emissions, and felt it was important to continue working collaboratively with other organisations and groups to encourage wider action on reducing carbon footprints.
 - The Committee expressed strong approval for the innovative work underway, including efforts to address water scarcity, and acknowledged the use of offsetting only as a last resort. Overall, the scrutiny committee had given its broad support to the strategy.
- iv. Acknowledged that the deliverability of some projects carried risk due to their scale and ambition. This reflected the Council's aspirations but also the fact that lower-cost, easier measures had largely already been implemented. Further progress would therefore require addressing more complex and challenging actions.

Cabinet **unanimously resolved** to:

- i. Note progress made in carbon reduction and the high international ranking of the Council and the City for work to address Climate Change
- ii. Note the outcome of the public engagement and feedback of the Services, Climate and Communities Overview and Scrutiny Committee.
- iii. Approve the new Climate Change Strategy (2026-2031).

26/22/Cab Biodiversity Strategy Mid-term review (2022 - 2025) and Action Plan (2026 - 2031)

The Cabinet Member for Nature, Open Space and City Services introduced the report.

The report referred to the revised Strategy incorporated consultation feedback while retaining the supported vision, themes, and objectives. It added new actions and projects to reflect the statutory Biodiversity Reporting Duty, the Urban Forest Strategy, the emerging Cambridgeshire & Peterborough Local Nature Recovery Strategy, the BIG Chalk partnership, and the ambition to work with communities toward future Nature City Accreditation.

In response to questions from Cabinet Members and those Councillors present, the Cabinet Member for Nature, Open Space and City Services said:

- i. Targeted community support had been provided through several programmes, including Nature City Accreditation to help residents, businesses, and institutions improve local spaces; promotion of the Parks Biodiversity Toolkit to enable communities to enhance nearby parks with planting, ponds, or wildlife corridors; and the Nature Recovery From the Ground Up programme, supported ward-based Local Nature Recovery Strategy (LNRS) delivery over four years, focused on areas with the poorest access to greenspace.
- ii. Additional support had been offered for Friends Groups, volunteering, swift boxes, neighbourhood canopy projects, and community nurseries for elms and black poplars, which provided practical opportunities for community participation regardless of neighbourhood constraints.
- iii. The 2026 consultation showed strong support for publicly sharing progress on the Council's biodiversity ambitions. Annual reporting would continue through an online Biodiversity Strategy Progress Report, outlining project delivery, habitat condition changes, and progress against Key Performance Indicators (KPIs) such as biodiversity net gain.
- iv. Regular biodiversity updates would continue in the Council's monthly newsletter, Cambridge Matters, alongside a bi-monthly online chalk streams newsletter for Councillors and communities.
- v. The Council would work with the Combined Authority and partners to develop shared performance monitoring for LNRS delivery. Together, these tools would provide a clear year-on-year picture of improvements and areas needing further focus.
- vi. Residents should expect clear, place-based improvements across the city, such as the expanded wetlands at Logan's Meadow, new diverse habitats were already attracting water voles, otters, and kingfishers. More species-rich grasslands and wildflower areas would replace closely-mown turf in parks and on commons, while the Urban Forest Strategy would deliver additional shade trees and climate-resilient planting on streets and estates, creating greener, cooler neighbourhoods and better habitats for wildlife.
- vii. Chalk streams one of Cambridge's most distinctive habitats, making improvements especially significant. The Council's wider streams project used restoration, monitoring and citizen-science to support long-term recovery in watercourses such as Cherry Hinton Brook and Hobson's Brook. The outcomes were intended to be visible to the public through clearer, healthier and more natural streams that better support wildlife and are easier for residents to value.
- viii. Practical improvements would also be seen in parks through enhanced meadows, wetlands and pollinator habitats, and in short streams through more natural banks, cleaner gravels, improved flow and stronger aquatic

vegetation, demonstrating measurable biodiversity net gain on the ground.

- ix. Noted the comments made by the Chair of the Services, Climate and Communities Overview and Scrutiny Committee:
- The Committee expressed broad approval for the policy.
 - Members noted that the definition of measurable net gain needed strengthening, as it appeared vague.
 - Highlighted the importance of joint working with external partners and effective communication with the public and community groups.
 - A discussion took place regarding the impact of dog fouling on soil composition and biodiversity, illustrating some of the practical challenges in delivering the strategy.
 - Overall, the Committee was supportive of the strategy.

Cabinet **unanimously resolved** to:

- Note the outcome of the midterm Biodiversity Strategy review, public consultation and recommendations of the Services, Climate and Communities Overview and Scrutiny Committee.
- Approve the content of the midterm review of the Cambridge City Council Biodiversity Strategy (2022 – 2031) for corporate design and publication.

26/23/Cab Urban Forest Strategy

The Cabinet Member for Nature, Open Space and City Services introduced the report.

The report referred to the Urban Forest Strategy 2026-2036 (UFS). This would provide the Council's strategic framework for protecting, managing, and growing Cambridge's Urban Forest over the next decade.

In response to questions from Cabinet Members and those Councillors present, the Cabinet Member for Nature, Open Space and City Services and Assistant Director, Public Realm and Environment said:

- The Urban Forest Strategy built on the existing Tree Strategy and projects such as Cambridge Tree Canopy Project. It strengthened data, engagement and shifted from a Council-led approach to a whole-city urban forest model, with measurable outcomes and ward-level analysis.
- A new tree dashboard was being developed to support decision-making for households, land managers, and planners.

- iii. The strategy recognised that most canopy was on private land and needed both influence and management.
- iv. Cambridge was among the leading authorities taking this data-led whole-city approach.
- v. Coleridge Ward had seen the largest canopy gains.
- vi. Priorities included sustaining progress through continued planting, protecting existing trees, and enabling more trees to reach maturity to improve street presence and shade.
- vii. The Council managed only a portion of the city's tree canopy, with a substantial proportion of it located on private land, institutional estates, and the highway network.
- viii. The Urban Forest Strategy took a whole-city approach, setting out how the Council would provide leadership and work collaboratively with landowners and agencies. This approach aimed to ensure decisions were coordinated, evidence-based and defensible, recognising that the strategy was about influencing and partnering rather than assuming control of assets the Council did not own.
- ix. Held a database on canopy composition, including tree types, sizes, and overall canopy cover, as well as detailed information on land types across wards. This enabled targeted policy decisions on planting locations and volumes.
- x. Larger gardens in the west of the city allowed for encouraging private garden planting, while in the east, with smaller gardens, planting in open or communal spaces was prioritised.
- xi. Species selection was also guided by the data to improve climate resilience, considering not only tree numbers but also types, sizes, locations, and the environmental impact they created in those spaces.
- xii. Noted that the Services, Climate and Communities Overview and Scrutiny Committee had reviewed the strategy, with no comments but general approval.
- xiii. Noted the following comments made by the Green Party, Opposition Leader:
 - Expressed appreciation for the prompt and thorough support provided by Officers and reiterated support for the Urban Forest Strategy.
 - Welcomed the guidance on planting and the good-practice material on appropriate planting strategies and building near trees but noted that this information was not always reaching residents; asked what could be done to ensure people know what to plant, where to plant it, and how to report threats to trees quickly.

- xiv. The strategy set out high-level principles, including the need of increased planting, but residents would need practical guidance on choosing the right tree for the right place.
- xv. The Council already had guidance on tree planting, locations, and species choice on its website. Officers would consider how this information could be given greater prominence. With additional resources secured through the budget-setting process, Officers could take this forward with the Tree Team to support implementation and accelerate delivery of the strategy's outcomes.
- xvi. Tree planting was a long-term project, noting that today's actions would shape the city for future generations.
- xvii. Emphasised the importance of planning for a leafy Cambridge for residents now and for children and future communities and expressed gratitude for the work being undertaken.

Cabinet **unanimously resolved** to:

- i. Approve the Urban Forest Strategy 2026-2036 (v5) and the supporting Topic Papers.
- ii. Note Scrutiny Committee's consideration of the Strategy's development history and consultation process (see section 6.4 of the Officer's report).
- iii. Endorse the proposed Delivery Framework (see Appendix 6 of the Officer's report), Policies, Actions and Key Performance Indicators (KPIs) as the basis for delivery and monitoring of the Strategy.

26/24/Cab City Centre Heat Network

The Cabinet Member for Climate Action and Environment introduced the report.

The report referred to the development of an outline Business Case for a Cambridge City Centre Heat Network. The Detailed Project Development (DPD) proposed a network using air source and river source heat pumps supported by a transition to electric boilers from gas boilers to generate energy. A Memorandum of Agreement had been jointly signed with Cambridgeshire County Council and 19 Academic institutions with significant heating demand in the city centre.

In response to questions from Cabinet Members and those Councillors present, the Cabinet Member for Climate Action and Environment said:

- i. Noted the Cabinet's enthusiasm for the project, noting its strong potential to deliver significant benefits for Cambridge if it proceeded and highlighting the environmental benefits of slightly cooling the river and

the potential to create new, varied habitats through the way water and welcomed the progress of the project.

- ii. Welcomed the comment that the project offered a meaningful way to address the climate crisis and could also deliver long-term financial savings. The project represented the Council as a community leader, bringing together numerous colleges typically not known for collaboration. The project would enable heritage buildings to be preserved while being decarbonised.
- iii. Noted the comments of the Chair of the Performance, Assets and Strategy Overview and Scrutiny Committee:
 - Governance: the need to establish robust arrangements, provide updates when the Green Heat Network Grant was confirmed, and consider governance models involving elected councillors.
 - Partnership working: close coordination with partners, including South Cambridgeshire, particularly as the business case moved forward.
 - Costs and technology: monitoring project costs, clarifying the planned reduction in gas-boiler use against expected financial benefits, coordinating with utilities, and keeping future expansion options under review.
 - Risk management: considering consequences of not proceeding, reviewing assumptions such as the net-present-value hurdle rate, managing risks linked to utility trenching, local government reorganisation, grid capacity, potential cost overruns, and licensing requirements for river extraction.
 - Communications: ensuring clear communication to residents about the project's benefits, learning from similar schemes elsewhere, and coordinating utility works during the build-out stage. Ongoing engagement with elected councillors was also requested.
 - The Committee was broadly supportive of the recommendations, subject to Scrutiny comments.
- iv. Confirmed the Cabinet report had been edited to reflect the comments made by the Scrutiny Committee and had noted all comments particularly those relating to the later stages of the project.
- v. A group of Council representatives (Councillors and Officers), partners, and colleagues from other UK authorities working on district heat networks had been invited by the Danish Embassy to visit established schemes in Denmark. The delegation would travel in April to learn lessons from these projects as learning from other schemes was vital.

- vi. The Council had been successful to date in securing government funding to support feasibility and earlier project stages, and continued government support was considered essential for progressing the scheme.
- vii. A significant benefit would be improved energy security. The scheme would enable the city centre, and potentially wider areas to generate its own energy in future. At present, energy costs were tied to gas prices, but hoped that this would change, potentially allowing the district heat network to deliver financial savings as well as environmental benefits.

Cabinet **unanimously resolved** to:

- iv. Agree to support the next steps in this transformative project to decarbonise a significant portfolio of Council and Academic estates in the city centre of Cambridge.
- v. Agree to support the Draw down of £0.6m from the Council's Climate Change Fund to fund pre-commercialisation activities
- vi. Agree to delegated authority to the Assistant Director, Development in consultation with the Director of Economy & Place and the Chief Finance Officer to submit a bid to the Green Heat Network Fund (GHNF) in 2026 to bring forward a City Centre Heat Network. This will require the council to:
 - 1. Enter into an updated Memorandum of Agreement with Academic Partners and County Council.
 - 2. Appoint a Specialist delivery Contractor to undertake design and commercialisation plans 1.4

That Cabinet **unanimously noted**:

- i. subject to the additional project development a final decision on whether to proceed would be brought to Cabinet and then to Full Council no later than March 2028
- ii. Connecting a heat network to Council assets would enable budgetary savings and carbon benefits for the Civic Quarter project compared to the business case estimates presented to Cabinet in September 2025.
- iii. At this outline stage the estimated project cost could be up to £121m, with the council share of £4m equity, £4.2m connection fees and a £18.4m loan at a rate compliant with Subsidy control.
- iv. With planned Local Government Reorganisation (LGR), and conditions arising from a Structural Changes Order (SCO), it is recognised that this final decision to proceed or not will need scrutiny and agreement from the Shadow Authority.

- v. Feedback to Cabinet from the Performance, Assets and Strategy Overview and Scrutiny Committee meeting of 3rd March 2026 will be issued separately.

The meeting broke for 10 minutes at the conclusion of this item.

26/25/Cab Transition Plan – Guildhall and Corn Exchange

The Cabinet Member for Culture, Economy and Skills Labour introduced the report.

The report referred to the closure of the Corn Exchange and Guildhall from December 2026 as part of the approved Civic Quarter Programme. The report sought approval to progress the temporary venue option to planning and preparatory procurement only. It is estimated that c£60,000 of costs ahead of any final decision will be incurred covering legal, planning and specialist venue and sound consultants.

In response to questions from Cabinet Members and those Councillors present, the Cabinet Member Culture, Economy and Skills Labour, the Leader and Director of Communities said:

- i. Welcomed the comment a pragmatic approach had been taken to retain and provide consistency for the staff at the Corn Exchange which was an important message to communicate.
- ii. As options for a temporary venue continued to be explored, consideration would be given to how the venue would be publicised, how people would access it, and the implications of locating it outside the city centre.
- iii. Welcomed the comment there was a strong value-for-money case. Noting that the value derived not only from maintaining cultural events for the public but also from retaining and utilising the skilled staff and sustaining key relationships with agents who booked the venue. This continuity was considered critical to ensuring that once the Corn Exchange reopened audience levels could be rebuilt if not increased beyond current levels.
- iv. In terms of reputational damage, the temporary venue(s) was identified as risk-mitigation measure linked to the Civic Quarter business case, not a discretionary cultural add-on. Doing nothing posed the highest financial and reputational risk, including audit concerns, promoter disengagement, and a 12–24-month delay in recovery.
- v. The temporary venue(s) would protect the Council's investment, the city's cultural ecosystem, and significant associated economic activity.

Although some risk remained, inaction would carry greater reputational consequences and believed audiences would understand the reasoning.

- vi. Officers had visited Orchard West in Dartford, where a temporary venue had been constructed, and had used this to inform adjustments to the Council's modelling. The projected 50–60% level was based not only on reduced capacity which was lower than the Corn Exchange's current 1,600 seats, but also on programming limitations. It would not be possible for any temporary venue to equal the full programme delivered across the Guildhall and the Corn Exchange. The figure therefore reflected both capacity and programming assumptions, supported by the performance of a comparable venue.
- vii. Noted further comments made by the Leader of the Liberal Democrats:
 - The group remained sceptical about the proposal and believed the evidence presented was insufficient to justify progressing to a planning application or incurring the associated costs.
 - Emphasised the primary priority for the Civic Quarter project should be reducing overall costs and improving the financial payback. It was not proven that adding an additional £1 million to an already expensive scheme would reduce risk but might increase it.
 - Alternative, less costly and less risky options could be explored to mitigate any delays to reopening and audience recovery.
 - The proposal felt premature and it was important to recognise that the sum in question would be in addition to the existing high project cost. This was not being debated as million pounds, but a million pounds on top of an already expensive project; the cost should be reduced and the payback increased.
- viii. Important to note that while the financial case centred on enabling the Corn Exchange to reopen at pace and return to full, potentially higher capacity, the Council also had responsibilities to its staff and to the wider local economy. These objectives needed to be balanced and did not consider the proposal premature, if the Council wished to proceed, it would need to bring it forward quickly given the Civic Quarter project timelines.
- ix. £1 million referenced was an already-approved earmarked reserve within the 2026–27 budget and therefore did not represent an additional cost. The substantive decision would come forward in September; the current request was to authorise the initial £60,000 within that provision.

Cabinet **unanimously resolved** to:

- i. Approve progression to planning submission for a temporary performance and events venue to support the transition period during the

closure of the Corn Exchange and Guildhall, subject to statutory processes and continued engagement.

- ii. Note that preliminary expenditure within the £1million approved provision will be incurred prior to a planning application and September Cabinet decision on the Civic Quarter project.
- iii. Approve progression to procurement of required venue infrastructure, equipment, and ancillary services, in preparation for a final decision in September.
- iv. Note the indicative programme and key delivery milestones.
- v. Note that alternative transition options have been considered and assessed.

26/26/Cab Consultation on the establishment of a centrally led Urban Development Corporation for Greater Cambridge

The Leader introduced the report.

The report referred to the Government proposals for a Development Corporation for Greater Cambridge. The Corporation would cover the areas of Cambridge City Council and South Cambridgeshire District Council. The purpose would be to accelerate economic growth in and around Cambridge over the next 25 years.

In response to questions from Cabinet Members and those Councillors present, the Leader said:

- i. Highlighted the summary of feedback from a meeting of the extraordinary Council held on 19 March 2026, where Members held a substantive discussion on this topic and expressed a range of views. There had been considerable agreement on several elements of the proposals, alongside some areas of disagreement.
- ii. Summarised concerns regarding the Government's proposals to remove planning powers from local authorities. They noted that the proposals covered two areas:
 - Plan-making powers, which would be transferred immediately but not used until after adoption of the next Local Plan, expected around 2029.
 - Planning determination powers, under which the Development Corporation would determine applications for larger sites, while local authorities would retain responsibility for smaller applications.
- iii. Key concerns included the loss of local democratic accountability, the reduced ability for residents' voices to influence planning decisions, and

the view that elected local authorities were best placed to balance competing considerations.

- iv. Highlighted the robust performance of the current democratically controlled planning service, noting 37,000 approved but unbuilt homes, the emerging Greater Cambridge Local Plan due for submission later in the year, and the high level of community engagement with over 100 events held during the most recent consultation. Such engagement would not be achievable under an unelected body.
- v. Noted the comment regarding the potential for unrestricted growth with no master planning in place.
- vi. Believed the central issue was the democratic deficit created by moving planning powers from elected local authorities to a Development Corporation, stressing that residents currently influenced decisions through their elected representatives, the Government and the Development Corporation must justify how a new planning committee would operate differently and sufficiently better to warrant removing these powers.
- vii. Question what a Development Corporation Planning Committee would do that was sufficiently different or better, and whether creating an entirely new committee could be justified when it would still be bound by the same national planning laws.
- viii. Although planning was a quasi-judicial function, elected councillors retain a closer and more accountable relationship with residents than appointees who may not live in the city and are not directly elected. The justification for such a transfer of powers should come from Government and the proposed Development Corporation.
- ix. Noted the comment made that the proposals undermined the Council's best-value duty, transferring profitable planning functions to a Development Corporation would leave the Council with a significant budget gap, harm recruitment, and retention, and weaken service quality. The Development Corporation should instead focus on long-standing infrastructure deficits, such as wastewater capacity and grid limitations before attempting to accelerate growth. The growth assumptions, particularly for the life sciences sector, were uncertain and required stronger national support. It was concluded that the proposals needed substantial improvement and warned that pursuing the transfer of planning powers would be detrimental.
- x. Highlighted that much of the planning process occurred before applications were formally determined, involving substantial engagement between developers and the planning service. Transferring this work to a Development Corporation would further reduce the influence of the local

authority and elected representatives over major schemes and how the city developed.

- xi. Noted the following points raised by Councillor Porrer:
- The Planning Committee always abided with the National Planning Policy Framework who considered applications where there has been an objection(s).
 - Stressed the importance of retaining cross party locally elected councillors in planning decisions, noting that councillors played a vital role in explaining decisions to residents and maintaining accountability.
 - Transferring functions to a Development Corporation could weaken enforcement, risk losing experienced officers, and undermine a high-performing planning service.
 - Agreed that the main concerns related to the proposed removal of plan-making and development-management powers and reiterated that infrastructure must be addressed first.
- xii. Noted the comments made by the Leader of the Liberal Democrats:
- Mistake not to have taken a vote on this matter at the extraordinary Council meeting.
 - The Cabinet debate seemed to have gone from a clear consensus at Full Council, where all contributions had warned against creating a democratic deficit, with a comment now made that was not so important. Urged the Leader not to be swayed from that position when finalising the response.
 - The comments collated from Full Council by the Joint Director of Planning and Economic Development was a fair and accurate representation.
 - Democratic accountability remained a central concern, as planning decisions involved a long, formative process, not just the final committee vote. Major applications, such as Cambridge East or North East Cambridge, would directly shape the existing urban area, making it essential that the Council retained control throughout.
 - Asserted reassurance that democratic deficit would be fully addressed in the Council's consultation response and noted that this had consistently been a core theme in their own contributions.
- xiii. The consultation consisted of 13 questions relating to the Government's proposal for a Development Corporation. The Council's response would be submitted in accordance with the Constitution agreed in May of the previous year, with the Leader holding ultimate responsibility for government consultation submissions. It would not have been practical

to vote on the precise wording of every part of the response, the views expressed were extremely helpful and would be fully considered.

- xiv. Confirmed they would be happy to share the draft response with group leaders before submission and the issue of democratic deficit would be included as had indicated in public debate.
- xv. Would encourage all residents to take part in the consultation.

[Greater Cambridge Development Corporation: Consultation - Ministry of Housing, Communities and Local Government - Citizen Space](#)

The Chair sought general assent that the Cabinet had considered the feedback from the extraordinary Council meeting held on 19 March and had provided sufficient advice for preparing the final response to the consultation on the proposal to establish a centrally-led Urban Development Corporation for Greater Cambridge. Members were reminded that they could submit any further advice after the meeting and that the draft would be shared with Opposition Group Leaders.

26/27/Cab Local Nature Reserve Designations in Cherry Hinton

The Cabinet Member for Cabinet Member for Nature, Open Space and City Services introduced the report.

The report referred to, a joint public consultation on the draft Biodiversity Strategy mid-term review and the draft Urban Forest Strategy was carried out via the City Council's Go Vocal portal from 7 January to 10 February, with a further one-week extension granted for email responses at the request of specific groups.

The strategy action plan proposed the designation of two new Local Nature Reserves in Cherry Hinton. These received support through the consultation, and, if approved, the Council would seek formal declaration through the statutory Natural England process during 2026.

In response to questions from Cabinet Members and those Councillors present, Nature, Open Space and City Services said:

- i. Noted the comments regarding Cambridge becoming a butterfly-friendly city work on the Cambridge butterfly trail had revealed that the Fulbourn Road open space was being considered for nature reserve status partly due to its increasingly important butterfly habitat.
- ii. The Member also emphasised the importance of creating connected nature networks, aligning with county-wide work, so that wildlife could

move between sites rather than being confined to isolated biodiverse areas.

- iii. Establishing smaller new nature reserves would benefit not only local flora and fauna but also residents' physical and mental health. They reiterated their support for the proposals.
- iv. Agreed that creating biodiversity corridors was essential and had agreed to speak residents in Coleridge ward about linking green spaces to support such corridors. Expanding these connections would significantly benefit the environment across the city.

Cabinet **unanimously resolved** to:

- i. Approve the proposed Local Nature Reserve (LNR) designations of Fulbourn Road Open Space, Cherry Hinton 2.
- ii. Approve the proposed Local Nature Reserve (LNR) designation of Church End, Cherry Hinton

26/28/Cab Greater Cambridge Authority Monitoring Report 2024-25

The Leader introduced the report.

The report referred to an overview of some of the key public sector reforms that will impact on the council in 2026-27. An annual report on the work of the key strategic partnerships that the council was involved in 2025-26 and an overview of their priorities for 2026-27.

The Leader noted the following comments made by those present:

- i. Highlighted the inclusion of bus franchising highlighting the initiatives which provided low cost or free travel, including free pre 9:30 travel for concessionary bus pass holders across the Cambridge and Peterborough area and the Tiger Pass.
- ii. Noted the role of young people, particularly through Citizens UK, in the campaign to retain the Tiger Pass.
- iii. Highlighted the Council's designation as a Youth Guarantee Trailblazer which was a significant achievement.
- iv. Commended the Region of Learning team, noting that their long-standing work on digital badging which had now been adopted and showcased by the Combined Authority.
- v. The Tiger Bus initiative had originated as a pledge from the Youth Assembly as part of the Youth Strategy.
- vi. Commended the strong work of the Community Safety Partnership, noting that this was clearly presented in the report.

- vii. To note the forecast funding gap arising as the Greater Cambridge Partnership progressed through the statutory processes and approvals for the sustainable transport routes. They noted that securing medium-term funding for delivering these schemes should be identified as a priority within the report.

Cabinet **unanimously resolved** to:

- i. Endorse the work programme for the council's Strategy team for 2026/27 as set out at 4.2 of the Officer's report, including keeping abreast of public sector reform initiatives that will impact upon the Council.
- ii. Note the achievements and progress of the key strategic economy, health and community safety-related partnerships that the council is engaged with, as detailed in section 5 of the Officer's report.
- iii. Endorse the importance of partnership working in the context of a changing public sector landscape.

26/29/Cab Strategic Policy and Partnerships Report

The Leader introduced the report.

The report referred to an overview of some of the key public sector reforms that will impact on the council in 2026-27. An annual report on the work of the key strategic partnerships that the council was involved in 2025-26 and an overview of their priorities for 2026-27.

The Leader noted the following comments made by those present:

- i. Highlighted the inclusion of bus franchising highlighting the initiatives which provided low cost or free travel, including free pre 9:30 travel for concessionary bus pass holders across the Cambridge and Peterborough area and the Tiger Pass.
- ii. Noted the role of young people, particularly through Citizens UK, in the campaign to retain the Tiger Pass.
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- iv. Commended the Region of Learning team, noting that their long-standing work on digital badging which had now been adopted and showcased by the Combined Authority.
- v. The Tiger Bus initiative had originated as a pledge from the Youth Assembly as part of the Youth Strategy.
- vi. Commended the strong work of the Community Safety Partnership, noting that this was clearly presented in the report.

- vii. To note the forecast funding gap arising as the Greater Cambridge Partnership progressed through the statutory processes and approvals for the sustainable transport routes. They noted that securing medium-term funding for delivering these schemes should be identified as a priority within the report.

Cabinet **unanimously resolved** to:

- iv. Endorse the work programme for the council's Strategy team for 2026/27 as set out at 4.2 of the Officer's report, including keeping abreast of public sector reform initiatives that will impact upon the Council.
- v. Note the achievements and progress of the key strategic economy, health and community safety-related partnerships that the council is engaged with, as detailed in section 5 of the Officer's report.
- vi. Endorse the importance of partnership working in the context of a changing public sector landscape.

26/30/Cab Risk Management Strategy and Framework

The Leader introduced the report.

The report referred to the update to Risk Management Strategy and Framework. The strategy set out the purpose of having a risk management process and highlighted the new Economic Crime and Corporate Transparency Act, legislation, which came into force 1 September 2025 and brought in the offence of 'failure to prevent'

The framework provided detail on how the Council conducted that risk management process, which has the risk management cycle at its core. It also highlighted how staff are supported and trained to use the process, and the recording systems in use across the Council.

In response to comments from those present the Chief Operating Officer said the following:

- i. Hazards formed a normal part of the overall risk-management process.
- ii. Risk management followed a hierarchy which eliminated a risk where possible, through mitigation measures, and, where necessary, to protective equipment and other controls.
- iii. Identifying a hazard was therefore only one element of the process; the key was determining how it would be managed.

Cabinet **unanimously resolved** to:

- i. Approve the revised Risk Management Framework and Strategy attached as appendix A of the Officer's report.
- ii. Agree the delegation of authority to approve minor changes and amendments to the Chief Operating Officer.

26/31/Cab Quarterly Performance Report

The Leader introduced the report.

The report provided Cabinet with an overview of the Council's performance over the period 1 October to 31 December 2025 (Q3).

In response to questions from the Liberal Democratic Opposition Leader, the Leader, the Chief Operating Officer, Chief Finance Officer and Cabinet Member for Housing responded with the following:

- i. Noted the following comment that a Q3 forecast, especially the financial elements, would have been beneficial during the budget-setting period, it was unfortunate it had not been available a month earlier. However, it had been a challenge to produce the report earlier due to the volume of information that needed to be collected and verified. Had worked closely with the Chief Finance Officer to bring the data together as quickly as possible but timings for this quarter had been particularly difficult because of the timetable of various meetings.
- ii. The projection for spending on the Housing Revenue Account (HRA) indicated a £3.1million spending above budget. This was due to significant structural overspends relating to repairs, particularly increased responses to damp, condensation, and mould in line with Awaab's Law. There had also been substantial interim waking-watch costs for fire-safety reasons, though these were now beginning to wind down. As part of the recent budget-setting round, over £2 million per year had been added to HRA revenue budgets from 2026/27 onwards. Work was underway within the Housing teams to ensure services could remain within these revised budgets going into 2026/27.

Time (8:00pm) Members unanimously agreed to continue the meeting an additional thirty minutes if required.

- iii. Officers had done an excellent job on the budget this year, noting that the scrutiny process had now been undertaken twice. It was important of securing additional funding for damp, condensation, and mould work and for essential repairs.

- iv. Acknowledged significant additional investment had been allocated to the HRA the coming year. Officers would closely monitor how the funding was used to reduce current cost pressures and to deliver an improved service for residents.

Cabinet **unanimously resolved** to:

- i. Note the contents of the Quarterly Performance Report for the period 1 October to 31 December 2025.

The meeting ended at 8.03 pm

CHAIR

**REPORT TITLE: BUDGET SETTING CONTEXT 2027/28****To:**

Cabinet

7 July 2026

Report by:

Jody Etherington, Chief Finance Officer

Tel: 01223 458130 Email: jody.etherington@cambridge.gov.uk

Wards affected:

All

Director Approval: Chief Finance Officer Jody Etherington confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Cabinet for decision.

1.	Recommendations
1.1	It is recommended that Cabinet: 1. Note the economic update and emerging pressures set out in sections 4 and 5. 2. Agree the high-level approach to budget setting for 2027/28 set out in section 6. 3. Agree the high-level approach to public consultation set out in section 8.
2.	Purpose and reason for the report
2.1	This report provides an update on emerging financial risks, and asks the Cabinet to agree the early strategic direction for setting the council's 2026/27 budgets.
3.	Alternative options considered
3.1	The council could choose not to hold strategic budget challenge meetings, which would come with a saving in senior officer time. However, there is a very real risk that detailed budget setting could become misaligned from the council's strategic goals, and

	opportunities to optimise the prioritisation of resources may be lost.																		
3.2	The council could adopt a different approach to public consultation, for example by implementing a detail-focussed public consultation later in the budget setting process, once individual budget proposals are clearer. However, this would remove the ability of the public to influence the strategic direction of budget setting and feed in suggestions for budget proposals early enough for these to be considered.																		
4.	General Fund																		
4.1	The Budget Setting Report (BSR) 2026/27, approved by full council in February 2025, set out the savings targets for the General Fund for the next five years, as follows:- <table><tr><td></td><td>2027/28</td><td>2028/29</td><td>2029/30</td><td>2030/31</td><td>2031/32</td></tr><tr><td></td><td>£m</td><td>£m</td><td>£m</td><td>£m</td><td></td></tr><tr><td>Savings target per BSR 2026/27 (cumulative)</td><td>0.375</td><td>0.750</td><td>1.125</td><td>1.373</td><td>1.638</td></tr></table>		2027/28	2028/29	2029/30	2030/31	2031/32		£m	£m	£m	£m		Savings target per BSR 2026/27 (cumulative)	0.375	0.750	1.125	1.373	1.638
	2027/28	2028/29	2029/30	2030/31	2031/32														
	£m	£m	£m	£m															
Savings target per BSR 2026/27 (cumulative)	0.375	0.750	1.125	1.373	1.638														
4.2	Work is ongoing to refresh the above targets in the context of emerging pressures, updated economic forecasts and prior year outturn figures. A new set of targets will be presented for Cabinet approval at its September meeting. However, it is currently anticipated that savings targets will increase, for the reasons set out below.																		
4.3	<u>Economic conditions</u> The BSR included an assumption for general inflation of 2.6% for 2027/28, and 2.0% for future years in line with the Bank of England target. However, since the BSR was published, global events (and in particular the war in Iran) have seen inflation rates continue to trend higher than previously forecast. The latest independent forecasts published by HM Treasury show CPI inflation at 3.6% for the 2026 calendar year, which will feed directly into 2027/28 prices. For context, a similar movement in forecast inflation rates last year increased the five-year savings target by almost £1.0 million.																		

4.4	Global conditions have also had an impact on borrowing costs. The BSR assumed an average PWLB borrowing rates for 2025/26 of 5.55%, however the current equivalent rate as at 29 June 2026 is 6.16%. Forecasters are anticipating the impact to be short-term – however given the extent of external borrowing required in 2025/26 (forecast at £45.8 million in the BSR), even a small increase in rates will have a lasting effect on the council's budgets. Increased borrowing costs may also put pressure on the financial sustainability of key capital projects, such as the new build housing programme and Civic Quarter project. The council will continue to work with its treasury management advisers to ensure that the approach to raising capital finance is optimised.
4.5	<u>Greater Cambridge Development Corporation</u> In June 2026, the government published its response to public consultation on the establishment of a new development corporation for Greater Cambridge. The government proposal will hand some of the council's planning powers to the new Development Corporation. Whilst the full details are not yet known, this is likely to cause significant financial pressures for the council, including costs associated with potential redundancies and/or TUPE arrangements. It is also likely that the council will lose a significant portion of its planning income in the future.
4.6	<u>Local government reorganisation (LGR)</u> The LGR programme continues to gather pace, with a government decision on the new unitary arrangements anticipated in July 2026. Whilst a £2.5 million reserve has already been set aside to cover transitional costs ahead of vesting day, actual costs remain highly uncertain. As well as the activity which will be necessary to ensure the council is ready for vesting day, there remains a risk that LGR will have a significant impact upon staff turnover and the council's ability to recruit to key vacancies, which will potentially add to cost pressures.
4.5	<u>Local government funding reform</u> The council has now received an indicative multi-year settlement from government

	covering the period to 2028/29, and this has been used to inform the BSR and the savings targets above. However, there remains significant uncertainty around business rates income following the 2026 revaluation (which has generated significant rating appeals) and baseline reset (which has removed all previously accumulated business rates growth). There is both downside and upside risk here – with the potential to start modelling future business rates growth if and when this materialises – however it remains too early to be certain of this. For context, the 2025/26 Outturn Report shows a shortfall in business rates income of almost £1.0 million. Income will be monitored closely over the coming months to inform the approach to setting business rate budget expectations for 2027/28 onwards.
4.6	<u>Service pressures</u> At this early stage, the following emerging unavoidable service pressures have been identified which are likely to impact upon council budgets for 2027/28 and beyond:- • The ongoing review of asset compliance across the council's operational estate is likely to identify some immediate requirements for capital works and remediation, which may be significant. • Initial indications show that, nationally, the new Extended Producer Responsibility (EPR) Scheme for packaging waste is not generating the level of income anticipated. Whilst the council was reasonably prudent in setting budget assumptions for future years, it remains to be seen whether the forecast income levels can be achieved.
5.	Housing Revenue Account (HRA)
5.1	During 2025/26, the HRA reported a net operating overspend of £6.9 million. This was mainly due to overspends on repairs and maintenance. The implementation of Awaab's Law has significantly added to cost pressures in this area, particularly around damp, condensation and mould (DCM). In addition, void costs continue to be significantly higher than comparable benchmarks, whilst the council has also been impacted by one-off costs relating to fire safety actions (waking watch) and insurance incidents in-year.
5.2	The 2026/27 BSR included significant ongoing investment of an additional £1.7 million per year into this service, recognising that many of the causes of overspend are demand-

	led and structural, and are unlikely to reduce soon. Focussed work is ongoing with the service to bring costs within the new budget envelope, but this remains hugely challenging. Any overspends on HRA services increase the amount that the council needs to borrow to fund its new build housing programme, which has a knock-on impact on future years' budgets through increased interest costs.
5.3	Furthermore, the 2026/27 BSR and 30-Year Business Plan assumes that the council will be successful in its bid to Homes England for a strategic partnership which will unlock significant capital grant funding. The outcome of this bid is expected shortly, and following this the 30-Year Business Plan will need to be refreshed.
6.	Budget Setting Approach
6.1	Assuming LGR proceeds as planned, this will be the final budget setting round for Cambridge City Council. However, it will still be necessary to take a medium-term view in order to ensure the financial sustainability of the council's services as they transfer to a new unitary authority. It is therefore proposed that a similar approach to budget setting is taken as last year.
6.2	Following the local elections in May 2026, the council is now in no overall control, with a minority Labour administration. In recognition of this fact, an informal Group Leaders' Finance Working Group has been established to ensure that each of the main political groups has full oversight of the budget setting process. The main steps to be followed over the coming months are as follows:-
6.3	<u>Strategic Budget Challenge Meetings (July/August)</u> Over the coming weeks, budget challenge meetings will be held for each of the council's groups. These will be chaired by the Chief Executive, and attended by the Chief Finance Officer, relevant Director and Assistant Directors, and other officers as appropriate. The meetings will have a strategic focus, and will include:- - Review of 2026/27 savings and risks to delivery - High-level review of Q1 forecasts and emerging risks and opportunities

	- Consideration of current and future service pressures, and member priorities - Consideration of potential savings opportunities, timescales and actions to progress these to formal budget bids - High-level review of significant contracts, including identification of opportunities for savings - High-level review of service standards and delivery mechanisms, including identification of opportunities for savings
6.4	Following the budget challenge meetings, outputs will be discussed with the Group Leaders' Finance Working Group and Informal Cabinet. Strategic objectives will then be agreed with members and then communicated to budget managers.
6.5	<u>Service Budget Setting (September)</u> The setting of detailed service budgets will take place during September, alongside the Q2 forecast process. Note that this process will take place a month earlier this year, in recognition of the no overall control environment and the need in this context for earlier and longer member engagement.
6.6	The detailed budget setting process will be similar to last year's, including a line-by-line review of all service budgets. A key objective is accurate budget setting, therefore, as last year, there will be no lower limit set on individual budget proposals. However, proposals which increase net service budgets will generally only be considered for:- - Invest to save opportunities which will deliver clearly identifiable savings in future years - Cost pressures which are genuinely unavoidable - Strategic member priorities
6.7	Following the service budget setting meetings, draft budget proposals will be collated for review and shared with the Group Leaders' Finance Working Group and Informal Cabinet, no later than the end of November. These will also take into account the results from the public consultation (see section 8 below). The draft Budget Setting Report will then be published in December, following the steer of Informal Cabinet on which budget proposals they would like to include.

6.8	<u>Budget Scrutiny and Approval (January/February)</u> The draft BSR will be subject to formal scrutiny by the Performance, Assets and Strategy Overview and Scrutiny Committee on 27 January 2027.
6.9	Cabinet will meet on 11 February 2026 and will be invited to recommend the Budget Setting Report to Full Council, after taking account of any comments raised during the scrutiny process and public consultation.
6.10	Full Council will be invited to approve the final Budget Setting Report at their meeting on 25 February 2026, which will be subject to the usual constitutional requirements, including the opportunity for opposition groups to submit budget amendments. Finance officers will provide appropriate support to opposition groups in the run up to this meeting.
7.	Corporate plan
7.1	The council's budget is underpinned by all aspects of its corporate plan: <u>Corporate plan 2022-27: our priorities for Cambridge - Cambridge City Council</u>
8.	Consultation, engagement and communication
8.1	A 6-week public consultation will take place during July/August. This is earlier in the process than last year, with the intention that it will allow the public to have a meaningful input into the prioritisation of council resources and development of budget proposals, rather than simply commenting on proposals which have already been developed. The consultation will be strategic in nature, for example seeking public views on the prioritisation of corporate priorities and council services.
8.2	The consultation will take place on the council's online consultation platform, and in line with the approved Code of Best Practice on Consultation and Community Engagement.

8.3	Results from the consultation will be fed into the budget setting process in September, as part of the process of developing detailed budget proposals. Summarised results will be shared alongside the full budget papers at the budget scrutiny meeting on 27 January, and with Full Council at their budget meeting on 25 February.
9.	Anticipated outcomes, benefits or impact
9.1	The benefit of adopting the approach set out in this report will be a robust budget setting and challenge process, which ensures allocation of resources is in line with corporate and public priorities, and a council which is financially sustainable and fit for the future.
10.	Implications
10.1	Relevant risks The key emerging risks to the council's medium-term financial sustainability are set out in sections 4 and 5 above. More detail will be provided in the BSR.
10.2	Financial Implications This report is concerned with agreeing the budget-setting approach and timetable, therefore there are no direct financial implications. Key emerging financial risks are set out at sections 4 and 5 above.
10.3	Legal Implications The approach set out in this report will allow the council to meet its statutory duty to set a balanced budget under the Local Government Finance Act 1992.
10.4	Equalities and socio-economic Implications The public consultation will be carried out in accordance with the Code of Best Practice on Consultation and Community Engagement, which requires full consideration of

	accessibility and inclusiveness. The Communications team will be fully engaged in this process to ensure best practice is followed.
10.5	The equalities and socio-economic implications of individual budget proposals will be considered as part of the budget setting process. The final BSR will include a full Equalities Impact Assessment (EqIA) covering all budget proposals where an impact has been identified. For significant proposals, individual EqIAs will be carried out in line with existing policy.
10.6	Net Zero Carbon, Climate Change and Environmental implications There are no implications arising directly from this report. As individual budget proposals are developed, each one will be assessed and given a climate rating, which will be reported as part of the BSR for consideration by full council.
10.7	Procurement Implications None identified.
10.8	Community Safety Implications None identified.
11.	Background documents
11.1	Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985: - Budget Setting Report and Medium Term Financial Strategy 2026-27
	To inspect the background papers or if you have a query on the report please contact Jody Etherington, Chief Finance Officer, tel: 01223 458130, email: jody.etherington@cambridge.gov.uk

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Report Title: Cambridge City Homelessness and Rough Sleeping Strategy (2021-2028) and accompanying Local Action Plan

To:

Cabinet – 7 July 2026

Report by:

Simon Hunt, Strategic Housing Advice Lead – Housing Advice

Tel: 01223 457932 Email: simon.hunt@cambridge.gov.uk

Wards affected:

All

Director Approval: Director of Communities, Sam Scharf, confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Executive Councillor for decision.

1.	Recommendations
1.1	It is recommended that Cabinet: Approves the introduction and implementation of the draft extended Cambridge City Homelessness and Rough Sleeping Strategy (2021 – 2028) and accompanying Local Action Plan as set out in Annexes 1 and 2 of this report.
2.	Purpose and reason for the report
2.1	This report details the background to the introduction of an extended Cambridge City

	Homelessness and Rough Sleeping Strategy (2021 -2028) and Local Action Plan to cover the period June 2026 – March 2028.
3.	Alternative options considered
3.1	The Homelessness Act 2002 establishes a duty on local authorities to carry out a homelessness review and to publish a Homelessness Strategy. Therefore, no alternative options have been considered.
4.	Background and key issues
4.1	Local authorities are required by legislation to carry out a review of homelessness in their district and to publish a Homelessness Strategy based on the results of the review at least every 5 years. Additionally, local authorities should develop effective action plans, to help ensure that the objectives set out in their Homelessness Strategy are achieved. The City Council's existing Homelessness Strategy expires in 2026 and, as result, commissioned management consultant PPL to carry out an up-to-date review of homelessness in the district to inform the direction of a new Homelessness Strategy and action plan. The findings from the review were presented to Climate and Communities Overview and Scrutiny Committee on 3rd February for consideration and comment. The full review can be found at annex 3. Under the second stage of the commissioned work, and having successfully concluded the review, PPL have produced an extended Homelessness Strategy and accompanying Local Action Plan and, once approved, will advise on the delivery of some of the actions. Whilst a Homelessness Strategy and action plan would typically be of 5 years in length, the City Council's strategy and action plan have been framed within the context of Local Government Reorganisation, the transition to a new unitary authority in April 2028, and what can realistically be delivered in the preceding period. Consequently, we have

	commissioned PPL to extend our existing 2021 – 2026 strategy, but with an updated 2 year action plan, to take us through to March 2028. The new unitary authority, once in existence, will need to produce an updated strategy to reflect its geographical boundaries and responsibilities. In May 2026, the Ministry of Housing, Communities and Local Government published guidance for developing Homelessness Strategies and action plans to ensure that Homelessness Strategies and actions plans developed by local authorities are aligned to the cross-government homelessness strategy, A National Plan to End Homelessness, published in December 2025. Our updated Homelessness Strategy and action plan has been drafted in line with the national guidance.
5.	Corporate plan
5.1	A decision to approve the introduction of the Homelessness and Rough Sleeping Strategy and accompanying action plan will support the City Council in its following key priorities, as set out in the Corporate plan 2022-27: -Tackling poverty and inequality and helping people in the greatest need -Building a new generation of council and affordable homes and reducing homelessness
6.	Consultation, engagement and communication
6.1	The Homelessness review was completed following extensive consultation and engagement with key stakeholders. These stakeholders included City Council staff, housing providers, voluntary and community organisations and health partners. Additionally, the review included the findings from in-depth, research conversations with people in Cambridge who have lived experience of current or recent homelessness. Ongoing engagement will continue through the Homelessness Strategy Steering Group, the Cambridge Homelessness Charter and other partnership forums to support delivery

	and monitor outcomes. Additionally, people with lived experience of homelessness will provide insight and challenge to service review, design and implementation via the Cambridge Co-Production Group, ensuring a trauma informed delivery of services. This is an important element of Changing Futures Cambridgeshire & Peterborough, a programme lead by the County Council to improve outcomes for people facing multiple disadvantage and which the City Council is committed to.
7.	Anticipated outcomes, benefits or impact
7.1	In broad terms, it is anticipated that delivery of the Action Plan priorities will result in earlier prevention of homelessness, improved access to accommodation, and a reduction in rough sleeping. Additionally, expected impacts include increased homelessness prevention and relief rates, reduced use of temporary accommodation, improved outcomes for people experiencing multiple disadvantage, and strengthened partnership delivery across the system. Metrics for the success of the strategy are in line with central government's Local Outcomes Framework for homelessness, covering prevention and relief of homelessness, a reduction in rough sleeping and minimising the use of temporary accommodation, including bed and breakfast, for families with children. Targets against these metrics have been set accordingly.
8.	Implications
	Relevant risks

8.1	Delivery of the Local Action Plan relies on effective partnership co-ordination, identified objectives keeping pace with homelessness demand and, in some cases, the availability of funding to progress actions. Mitigation includes performance monitoring against identified metrics, governance oversight of the Local Action Plan, identified funding sources and working closely with the Cambridge Homelessness Charter group as one of the key delivery mechanisms.
	Financial Implications
8.2	As the actions within the Homelessness Strategy are progressed, there may be identified financial costs associated with them. Where viable, we would anticipate funding initiatives with associated costs through our multi-year homelessness grant from central government and the City Council's Transformation Reinvestment Fund, for which spending approval was received for up to £170K over the life of the project covering the review, the strategy and support with delivery. The Local Action Plan includes a specific action around social investment by exploring the possible use of Greater Cambridge Impact Fund to support the delivery of additional high needs and 'step-down' accommodation. The strategy will provide an opportunity for the City Council to introduce more outcomes-based commissioning of services to support us in meeting its objectives.
	Legal Implications
8.3	The City Council has statutory duty to produce a Homelessness Strategy based on a review of homelessness in its district and to develop an action plan to take forward the objectives identified in the strategy.

	Additionally, the action plan reflects emerging national policy requirements, including strengthened expectations around partnership working e.g. the Duty to Refer and forthcoming Duty to Collaborate. There are no adverse legal implications arising from the recommendations in this report. They support the Council in discharging its statutory homelessness duties, reducing rough sleeping and policy commitments.
	Equalities and socio-economic Implications
8.4	The objectives within the Local Action Plan will support individuals with protected characteristics even if not directly targeted at them. Homelessness disproportionately impacts vulnerable groups. The Action Plan specifically targets: • households facing financial shocks and debt • people experiencing multiple disadvantage • individuals at risk of rough sleeping An Equality Impact Assessment (EqIA) has been completed.
	Net Zero Carbon, Climate Change and Environmental implications
8.5	No positive or negative impact identified as the services recommended for grant aid are broadly similar to those supported in former years.
	Procurement Implications
8.6	None.
	Community Safety Implications

8.7	Effective homelessness prevention and a reduction in rough sleeping will contribute to improved community safety and wellbeing across the city.
9.	Background documents Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985
9.1	None
10.	Appendices
10.1	Appendix 1: Strategy 2028 Extension Appendix 2: Cambridge Local Homelessness Action Plan Appendix 3: Cambridge City Homeless Review
	If you have a query on the report please contact Simon Hunt, Strategic Housing Advice Lead. Tel: 01223 457932. Email: simon.hunt@cambridge.gov.uk

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Cambridge City Council

Homelessness & Rough Sleeping Strategy

2021-2026 (extended to March 2028)

Targeted tracked update: 2026-2028 delivery plan and minor strategy extension only.

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Foreword from Richard Johnson, Executive Councillor for Housing

Cambridge is a place of contrasts. For many it is a great place to live and work, offering significant opportunities. But with success come real issues of inequality and a chronic shortage of housing that people can afford. With high rents and house prices, and with around 1600 applicants on the council's housing register, homelessness and rough sleeping are big issues for the City.

People often see homelessness as mainly a problem for those seen sleeping on the streets. But there are many more Cambridge households experiencing housing stress such as those living in poor or overcrowded conditions; private tenants unsure whether their lease will be renewed; people living in hostels; people forced to leave their homes because of domestic abuse; the 'hidden homeless' sleeping on friends' sofas because they have nowhere else to go. The list goes on.

This new Homelessness & Rough Sleeping Strategy outlines how we intend to work in partnership with others to help prevent as many people as possible from experiencing the misery of becoming homelessness.

Our council house building programme is part of the solution, as is work with developers to bring forward new affordable homes. But it is not just about building. It is also about ensuring that

the right support is available - to help people to remain in their homes or to find alternative accommodation where necessary. We are determined to continue to improve engagement with a whole range of partners, such as statutory services, private sector landlords and the voluntary sector. We also recognise the need to invest in more financial support to those who need a helping hand as part of our approach to homelessness prevention.

For many of those affected, risk of homelessness is tied up with a combination of other issues, such as poor mental and/or physical health, drug and alcohol problems or being in debt. A much more joined up approach is needed across a whole range of services, including mental & physical health services, social care and other housing providers. One example of this involves our commitment to a new cross-partner 'Streets to Home' service, to help move people rapidly off the streets and into accommodation, providing individually tailored support to help them to get back on their feet.

The Strategy has been developed during the Covid-19 pandemic which has affected all our lives. This has created additional risks and challenges which need to be overcome, but it has also opened up new and unexpected opportunities and ways of working, and we need to continue to build on these.

I am confident that the improvements proposed through this Strategy will increase our success in preventing homelessness and make a real difference to people's lives.

Executive Summary

Introduction

The most visible form of homelessness involves people who are seen living on the streets, but the issue of homelessness is much broader than that, including, for example, people living in overcrowded or temporary accommodation or who are threatened with eviction. Anyone can become homeless, but issues such as unemployment, poor physical and mental health, alcohol and substance misuse, relationship breakdown, and combinations of all these, will increase the risk of losing a home and of being unable to quickly find another. As well as the impact on the individuals, there are also recognised costs to the economy.

This new Strategy confirms the council's commitment to preventing and relieving homelessness and rough sleeping, and how we will work with partners to meet our objectives and priorities.

It is an ambitious strategy, written at a time of uncertainty as to the full impact of the Covid-19 pandemic. There are already signs that the fall-out from the pandemic is putting more people at risk of homelessness and this may present challenges to achieving what we set out to achieve. But work with partners in responding to the crisis has also opened the door to exploring new and innovative solutions and different ways of working. Our proposed actions moving forward have been developed in this context.

Vision, objectives and priorities

The objectives of the Strategy are to:

- Prevent people from becoming homeless
- Where homelessness cannot be avoided, help people to find suitable accommodation
- Minimise rough sleeping; and
- Ensure that housing outcomes for all residents reflect the Council's vision of 'One Cambridge, Fair for All'.

To achieve these objectives, the council will work with partners to realise the following priorities:

- Support those at risk of homelessness to remain in their homes whenever possible or to find a new home without an intervening period of homelessness.
- Improve access to a range of permanent accommodation.
- Minimise the use of temporary and emergency accommodation.
- Improve access to, and the effectiveness of, support services.
- Prevent rough sleeping.
- Break the cycle of chronic and repeat street homelessness and rough sleeping. The chapter headings in the strategy reflect these priorities and an action plan for 2026 – 2028 is contained in Annex 6.

National and local context

Our objectives and priorities are set within the council's broader strategic objectives, and in the context of other national and local strategies and plans. National examples include the Homelessness Reduction Act 2017, the National Rough Sleeping Strategy, and proposed private rented sector reforms. Issues which are contributing to housing stress and homelessness locally include:

- High demand, a shortage of homes and affordability issues locally across all tenures, particularly, although not exclusively, affecting those on low incomes.
- Issues such as poverty, inequalities in health and education, and being members of certain minority groups can increase housing pressures and the risk of homelessness.
- How welfare benefits aimed at covering housing costs are set and major reforms to the welfare system, which have been taking place over the last few years.
- Shortage of funding available for new affordable homes.

These local housing issues, and our plans to tackle them, are set out in our Greater Cambridge Housing Strategy. That document sets out the strategic direction for housing activity in Cambridge City and South Cambridgeshire District. It should be seen as the companion document to this homelessness strategy and read alongside.

Priority 1: Support those at risk of homelessness to remain in their homes where possible

Early intervention is essential to helping prevent homelessness. Although there may be many reasons for homelessness, loss of a privately rented home and family or friends no longer willing to accommodate are the two most common main reasons recorded locally. Other reasons include relationship breakdown, eviction from supported housing, the end of a social housing tenancy, and violence & harassment (including domestic violence). For many people there will be a number of reasons, and some will have multiple and complex needs. The Strategy highlights a number of services available to help people remain in their homes, including: financial and debt advice; work with landlords and letting agencies; work with family and friends with whom the person at risk is living; a tenancy sustainment service for council tenants; and partnership work to tackle anti-social behaviour, harassment and domestic abuse. Work in all of these areas needs to continue to be strengthened. To support those at risk of homelessness to remain in their homes we will:

- Strengthen and better define (preferably backed with written agreements) how we work with health service and County Council partners to better support people with poor mental health or substance misuse problems to sustain a tenancy.
- Expand and better resource and publicise existing early intervention and financial support initiatives for people facing the loss of a private sector tenancy.
- Better support people to remain living with family or friends until a new home can be found.
- Encourage private landlords and letting agencies, social housing providers, owner-occupiers and tenants to contact the Council at an early stage when a home is at risk.
- Explore further tenancy rescue solutions for private tenants including the potential for targeted grants and loans.
- Review the financial advice services available, to identify any gaps, duplication or problems with accessing services.

- Review the effectiveness of financial advice and tenancy sustainment services for council tenants.
- Seek to set up a working group with other housing providers operating locally, to help agree common policies and approaches and help minimise the number of social housing evictions.
- Continue to work with partners on a 'whole housing approach' to dealing with domestic abuse.
- Improve how we capture reasons for homelessness.
- Improve understanding of what impact of Covid-19 might have on the risk of homelessness, so that we can plan and respond accordingly.

Priority 2: Improve access to and range of permanent accommodation

With high demand and with housing of all tenures (but particularly social housing) in short supply, there is a need to expand the housing options available to those who are homeless or at risk of homelessness. This includes looking beyond just social housing as the main tenure of choice and improving access to other tenures and housing types. The current approach includes increasing the supply of social housing through the council's new-build programme; financial advice and support, including our Housing Benefit top-up scheme (HB+) and grants & loans to help people to access the private rented sector; encouraging landlords to lease homes through the council's social lettings agency, Town Hall Lettings; and loans for bringing private long-term empty homes back into use. To help improve access to and the range of permanent accommodation available the council will:

- Explore how access to homes across a range of tenures might be improved, and how homes might be used more flexibly to meet a wider range of needs.
- Encourage take-up of private rented sector housing options, including out of town lets, through better promotion, additional incentives and improving support available.
- Improve engagement and partnership working with landlords, letting agencies and other private owners.
- Introduce additional incentives to improve the availability of private rented homes through Town Hall Lettings.
- Review the council's Housing Benefit Plus scheme with a view to making it a more attractive option
- Work with housing providers to explore how better use might be made of existing homes.
- Work with housing providers with a view to increasing access to housing for those with high levels of need, and better alignment of council and other providers' allocations policies.
- Investigate the feasibility of delivering more specialist forms of housing, and homes for people previously on middle incomes who may be at risk of homelessness, through the council's house-building programme.
- Investigate potential for conversion of commercial property to good quality accommodation through the council's housing development programme.
- Review the council's approach to Local Lettings Plans in the context of access to housing for those with high levels of need.
- Review the sub-regional Home-Link Lettings policy with partners to ensure it best serves local authorities' homelessness prevention objectives.

Priority 3: Minimise use of temporary and emergency accommodation

The chronic shortage of permanent housing means there is a need for a supply of suitable temporary accommodation for those for whose cases are being investigated and those waiting for more permanent accommodation. Accommodation for use at short notice in an emergency is also important (issues around hostel accommodation for single homeless people and rough sleepers are dealt with under Priority 6). Demand for such accommodation and length of stay has been increasing and additional use of hotel rooms was necessary during the coronavirus lockdown. Long stays in temporary accommodation are far from ideal for the households concerned and are financially costly – particularly use of commercial hotels. There is a need to reduce overall reliance on temporary accommodation (through interventions such as those already referred to above) whilst at the same time ensuring sufficient is available to meet needs. To help minimise the use of temporary and emergency accommodation the council will:

- Systematically reduce demand for temporary and emergency accommodation by focusing relentlessly on preventing homelessness.
- Build on our understanding of the recent increase in the use of and length of stay in temporary accommodation to develop alternatives and keep information on demand under regular review.
- Improve our approach to monitoring of pathways through interim accommodation, and regularly review placement decisions to ensure consistency in decision making.

- Get a better understanding of the sizes and types of temporary and emergency accommodation needed.
- Continue to look for alternative ways of providing temporary and emergency accommodation, including for those for whom standard provision is unsuitable.
- Ensure we have the right internal processes in place to enable us to use our council housing stock to respond quickly to peaks and troughs in demand for temporary accommodation.
- Review the extent to which housing related debt should remain a barrier to being offered a home.

Priority 4: Improve access to and effectiveness of support services

Access to accommodation is only part of the solution in relation to homelessness, with significant numbers of people affected having additional support needs which put them more at risk of homelessness. Mental health support is the most common need, but many will have multiple needs. The council supports (in some cases financially) a range of other agencies. Examples include those providing financial advice; drug & alcohol services; support for prison leavers, domestic abuse services; etc. There is a strong commitment from most partners to work together in this area. However, issues such as lack of resources and gaps in services mean that people all too often fall through the cracks. Areas identified as particularly needing attention include mental health services and dealing with homelessness & anti-social behaviour linked to misuse of drugs and alcohol. There is a need to move more towards a 'whole systems' approach across services, agencies and the wider community. To help improve access to and effectiveness of support services the council will:

- Further improve working arrangements with mental health, substance misuse and social/social care services, including investigating the potential for some co-location of services and/or development of multi-disciplinary teams.
- Strengthen work with partners to provide a joined-up approach to preventing and tackling drug and alcohol related anti-social behaviour.
- Improve our understanding of the underlying reasons for homelessness, and use this understanding to help inform service design, planning and operation.
- Work to improve collaboration with statutory partners at a strategic level, including working with the County Council and other partners with a view to developing a fully integrated, multi-disciplinary homelessness service across a range of agencies.

Priority 5: Prevent rough sleeping

Homelessness is linked in the popular imagination with rough sleeping, but the majority of people presenting to the Council as homeless are not sleeping rough and, happily, are unlikely ever to face the prospect of having to do so. Rough sleeping is a special case of homelessness which needs to be understood on its own terms and tackled in a way that is informed by that understanding. A key consideration is that for many chronic and repeat rough sleepers, if not most, their homelessness is a symptom and not the primary problem. To complicate the issue further, some rough sleepers are known to have a permanent home or a hostel bed. Similarly, people street begging may not necessarily be without accommodation, and their presence on the street often causes the public to underestimate the scale of local provision and the open availability of local hostel spaces and support services. Chronic and repeat rough sleepers strongly tend toward having multiple and complex needs. Mental health and/or substance misuse issues are often the main ones, but there may also be a number of other contributory factors. Whether measured locally or nationally, the vast majority (usually above 80 percent) of rough sleepers are men. But while women are comparatively less likely to sleep rough, they often present with particular mental health and substance abuse problems and very often have particular needs, including a greater likelihood of being subjected to sexual and other forms of exploitation. Informed by research and experience, and the recent intensive training of housing advice staff in identifying and responding to domestic abuse, we feel we have a good understanding of the differing needs of male and female rough sleepers, but we plan to improve that understanding through consultation with female rough sleepers. There is a significant flow of rough sleepers onto the streets of Cambridge each year – often originating from outside the City - and targets for maximum numbers of rough sleepers are being missed. A significantly improved, more joined-up approach is needed in this area, with early intervention a critical part of this. To help prevent rough sleeping the council will:

- Improve our understanding of the nature and causes of rough sleeping in Cambridge.
- Work with partners to understand how prevention activities, as a whole, can help identify those at risk of rough sleeping, and help to intervene early to prevent the flow of new rough sleepers onto the streets.
- Gain a better understanding of where rough sleepers have come from, develop a more proactive approach to reconnecting rough sleepers to where

Executive summary they came from and review the offer available to those without a local connection.

- Aim to keep the number of rough sleepers below 10 for any one count, reducing to five through the lifetime of the strategy.
- Set demanding new targets for the number of individual rough sleepers seen in any year and the length of time they are on the streets before they are housed.
- Seek the views of female rough sleepers as to their experience of homelessness and local service provision and, informed by this, consider what we might additionally need to do to ensure that the particular needs of homeless women are met.
- Work with partners to explore how an emergency accommodation offer can be made available for anyone sleeping rough across Cambridgeshire and Peterborough.
- Review the current approach to education around homelessness prevention amongst young people and step up our ongoing publicity campaign to better inform the public about homelessness and rough sleeping and the services we and partners provide.
- Review the current approach to street begging and anti-social behaviour.
- Ensure we assist every European Economic Area (EEA) national rough sleeper capable of achieving, and wishing to obtain, UK settled status to do so before the end of the 'grace period' in June 2021, and ensure that advice and practical support compliant with the law is available for those remaining rough sleepers without access to public funds.
- Promote and support effective implementation of the young people's assessment and care leaver protocols across all relevant partners.
- Review the prison leavers' protocol and identify how prison leavers' housing needs can be identified and addressed at an earlier stage.
- Work with South Cambridgeshire District Council to help prevent single homelessness within their district.

Priority 6: Break the cycle of chronic and repeat street homelessness

Once people have started sleeping on the streets there is a high risk of remaining there and being caught in a 'revolving door' of insecure accommodation and street homelessness and rough sleeping. Although it does not suit everyone, hostel accommodation has an important part to play in supporting people off the streets and helping them to prepare for a move towards more permanent accommodation. The council considers there to be enough hostel accommodation to meet the City's needs, but that spaces are not becoming

Executive summary available often enough to meet demand because people are remaining in hostels for longer than may be necessary. Working with hostel providers, we will ensure that move-on planning with residents will begin early in their stay and that full advantage is taken of the various schemes we have introduced to make a private-rented move-on solution more affordable and more desirable. In support of this change of emphasis we will review our hostel allocation and resettlement panel (HARP) process in order to increase move-on capacity and ensure a fair balance between people in hostels and other housing register applicants. As well as working with other agencies, the council is keen to work with, and harness the interest shown by, the wider community in dealing with issues of homelessness and rough sleeping. This interest has been particularly evident during the Covid pandemic. To help break the cycle of chronic and repeat street homelessness & rough sleeping the council will:

- Work with providers to speed up move on from hostels, whilst at the same time reviewing how evictions and abandonments can be reduced.
- Work with providers to review the scope and effectiveness of hostel-based support, particularly in relation to move-on advice.
- Explore whether being excluded from moving on due to previous breaches of tenancy can be prevented.
- Work with sub-regional partner authorities to help ensure a proportionate provision of accommodation for rough sleepers in order to reduce drift into Cambridge.
- Work with the County Council to assess what balance between hostel and other accommodation might be appropriate going forwards.
- Promote and make private rented housing a more attractive option, to help make it available to a wider range of applicants.
- Review the effectiveness of the Housing First model of permanent provision and explore whether it should be extended to include private rented sector homes.
- Explore with social housing providers whether there are opportunities for short life or low demand social housing available, including to single sharers.

- Expand the provision of modular homes and explore other innovative ways of providing accommodation to prevent and relieve single homelessness.
- Continue to seek and make best use of funding opportunities to purchase new homes to accommodate rough sleepers.
- Work with the County Council in considering the need for commissioning longer term supported provision for those for whom mainstream housing with support may not be suitable.
- Work collaboratively on shifting emphasis from mainly a streets-based to a mainly home-based service model.

Funding the Strategy

2026-2028 update: The delivery plan will align existing homelessness, rough sleeping, temporary accommodation, supported housing, health, care and partner resources wherever possible. A social investment proposition, including a Housing Pathways Fund model, will be developed and evaluated to support delivery of high-needs housing, Housing First and move-on accommodation where this is viable and proportionate.

The work of partners is fundamental to meeting the objectives and priorities in this Strategy. Each will, to a greater or lesser extent, have their own funding streams to draw upon. The main sources of funding for the council itself include council General Fund resources, housing benefit, and various government grants, including those requiring bids for specific projects. The council will continue to take every opportunity to maximise and make best use of resources available. The council will seek to develop a series of 'off the shelf' bids so that it is ready for external funding opportunities as they arise.

Implementing and Monitoring the Strategy

2026-2028 update: Delivery of this strategy will be overseen by a multi-agency Homelessness Strategy Steering Group, supported by existing operational partnerships and reporting through council governance arrangements. Existing partnerships will be used wherever possible rather than creating new structures. See Annex 6 (Local Action Plan 2026 – 2028) for full details.

Introduction & Purpose

The popular perception of homelessness is where someone has nowhere to live. This is most visible where homeless people are seen sleeping rough on the streets, and government has a national target of ending rough sleeping by 2027. But there are also other forms of homelessness, often hidden from wider public view. These include people living in some form of temporary accommodation or shelter; living in insecure housing – for example, where threatened with eviction or staying with family or friends (sometimes known as ‘sofa surfing’); or living in inadequate housing such as in severely overcrowded or poor conditions.

Almost anyone can find themselves facing homelessness, whether it be due to losing a job, relationship breakdown, fire or natural disaster. However, there are a number of factors which make it far more likely a person will lose accommodation. Long-term unemployment, poverty, poor physical or mental health, relationship breakdown, drug and/or alcohol problems and leaving institutional care are just a few examples. It is already evident that Covid-19 is increasing the risk of homelessness by exacerbating tensions in the home and increasing job insecurity. Rising unemployment will put more households at risk, particularly those already on low incomes with little or no savings behind them, and those living in insecure accommodation.

During 2018/19 and 2019/20, the council accepted over 1,600 applications from households who were homeless or at risk of homelessness and to whom the council owed a statutory homelessness duty. During each of those two years around 160 individuals were counted as sleeping rough on the streets.

Not only is homelessness and rough sleeping traumatic for those experiencing it, a government evidence review in 2012 identified some of the financial costs to the economy. These included provision of benefits and employment programmes, health and care services, costs to the criminal justice system, and grants to and expenditure by local authorities. Cambridge

City Council has, for many years, prioritised the prevention of homelessness and rough sleeping. We have a well-established homelessness and rough sleeping action plan, which has been developed and implemented and kept under regular review by a partnership of organisations operating locally.

This new Homelessness & Rough Sleeping Strategy outlines our strategic direction and the actions we propose to take to help prevent and relieve homelessness and rough sleeping in Cambridge. It aims to communicate our vision and priorities to partners and the wider public and helps to support broader council ambitions set out in its other strategies and plans. It also meets the statutory requirement for each housing authority to have a strategy for preventing homelessness in their district.

Vision, objectives & priorities

Corporate objectives

As well as helping to support national policy, this Homelessness & Rough Sleeping Strategy is also important in helping to achieve three of the council's broader objectives:

- Supporting the economy.
- Promoting health and wellbeing; and
- Tackling poverty and inequality

Housing Strategy vision and objectives

This Strategy also helps support the vision in our Greater Cambridge Housing Strategy: ‘Healthy, Safe, Affordable: Homes & Communities for All’. In particular, it will contribute to the council wanting Cambridge to be a place where:

- Everyone has access to a suitable home, and residents are able to live as healthily, safely, and independently as possible.
- The housing market functions effectively, providing homes which are affordable to people on all incomes.
- There is a wide and varied choice of good quality, sustainable homes of different sizes, types and tenures, including new provision of council homes, to meet the needs of a wide range of different households and age groups.
- We have strong relationships with residents, developers and partners that enable housing and services to be delivered effectively, and that support innovation where appropriate.

Other relevant council strategies and plans are listed at Annex 1 of this Homelessness & Rough Sleeping Strategy.

Homelessness and Rough Sleeping Strategy objectives and priorities

Through this Strategy, the council will deal with homelessness and rough sleeping by working with partners to achieve the following objectives:

- Prevent people from becoming homeless.
- Where homelessness cannot be avoided, help people to find suitable accommodation.
- Minimise rough sleeping; and
- Ensure that housing outcomes for all residents reflect the Council's vision of 'One Cambridge, Fair for All'.

To help meet these objectives the Strategy is based around six key priorities:

- Support those at risk of homelessness to remain in their homes where possible or to find a new home without an intervening period of homelessness.
- Improve access to a range of permanent accommodation.
- Minimise the use of temporary and emergency accommodation.
- Improve access to, and effectiveness of, support services.
- Prevent rough sleeping.
- Break the cycle of chronic and repeat street homelessness and rough sleeping.

Local & national context

Factors contributing towards homelessness

There are a number of factors which contribute towards homelessness and how we and our partners are able to respond to it.

High demand and lack of affordability

As our Housing Strategy outlines, high employment levels and strong economic growth bring major opportunities for Cambridge, but also present significant challenges, including high housing costs and a shortage of accommodation which is affordable to local people. The issue is particularly acute for those on low incomes. Key problems include:

- High demand for and a shortage of social housing for rent. There are currently around 1,800 households on the council's Home-Link housing register. Although this includes some people with low priority for housing, we know that there are also people in housing need who are not registered. For example, those with very complex needs – including some rough sleepers - may not be sufficiently well engaged with services to register; others may decide not to if they feel they have no chance of being housed – e.g., if they have been evicted from previous accommodation or have a housing related debt.
- A mismatch between the profile of social housing applicants and the size and type of housing becoming available for letting.
- Shortage of private rented homes, leading to high rents. This is compounded by a Local Housing Allowance (the maximum amount which housing benefit, or the housing element of Universal Credit will cover for housing costs) which is intended only to meet the lower one-third of local private rents - for which there is great competition. Unaffordability for people on benefits remains the case even following the recent welcome increase in Local Housing Allowance rates (and we understand that these rates are now due to be frozen).
- Affordability of rents on new council and housing association homes. Most new affordable homes for rent are now only available at 'affordable rents' which can be charged at up to 80% of market rents and are higher than social rents. The council's policy has been to request that providers charge no higher than Local Housing Allowance rates to ensure that rents are as affordable as possible. However, even this is unaffordable to some, and under our existing policy (currently under review), the recent increase in Local Housing Allowance rates may have the perverse effect of social housing rents being increased, making them less affordable to those on low incomes.

Poverty & Inequality

In 2017, Centre for Cities identified Cambridge as the most unequal City in the UK. ¹For example, 2018 income related indicators ²show that average weekly earnings for the lowest 10% of earners were 3.5 times less than the average for all Cambridge employees; and council data shows that in 2017 around 14,000 of Cambridge residents lived in households claiming Housing Benefit and/or Council Tax support through the Council Tax Reduction Scheme. ³

The impact of Covid-19 on jobs and incomes is likely to lead to many more people in Cambridge experiencing economic hardship, including some of those who have previously been relatively well off. It will also exacerbate existing poverty; those who have no credit history or savings to fall back on are likely to be particularly hard hit. The Council's Anti-Poverty Strategy (currently under review) gives more information on the links between poverty and homelessness.⁴

In terms of protected characteristics, evidence from the Cabinet Office identifies that Black and minority ethnic (BAME) people are more likely than non-BAME people to experience housing issues in relation to quality of housing, cost of renting as a proportion of income and overcrowding. ⁵ LGBT research from Stonewall also found that around one in five trans people had experienced homelessness at some point in their lives.⁶

Inequalities in health and educational attainment are also factors. A full Equality Impact Assessment will be carried out on the Strategy.

National Policy

The Homelessness Reduction Act

The Homelessness Reduction Act 2017⁷ introduced new legal duties aimed at preventing homelessness, and swiftly relieving homelessness where it cannot be prevented or has already happened.

Although the council has had a long history of actively helping to prevent and relieve homelessness, the Act has required a number of changes to be made to services and to ways in which the council works with other partners. This strategy aims to continue to build on those changes.

Pleasingly, the number of people seeking housing or homelessness advice and assistance has shown a marked increase since the Act came into force, indicating that people are identifying, and seeking a solution to, an impending housing difficulty earlier.

National Rough Sleeping Strategy

The government's Rough Sleeping Strategy aims to halve rough sleeping nationally between 2018 and 2022, and to eliminate it by 2027. ⁸ It is intended to support every person who sleeps rough off the streets and into a home, and to prevent rough sleeping from happening in the first place. Several funding streams are in place to support delivery of the strategy.

Whilst the council fully supports this as an aspiration, with an ongoing flow of rough sleepers into Cambridge from elsewhere it is unlikely that we will be able to fully eliminate rough sleeping in Cambridge. A proposed local target is referred to elsewhere in this Strategy.

Welfare Reforms

A programme of major changes to the welfare system has been taking place recent years, aiming to simplify the system, cut the overall welfare bill and encourage people into work. As a result, many people have had their benefits cut, including those in work. Research carried out for Crisis suggests a link between the national increase in homelessness over the last few years and the roll out of welfare reforms.

For example, single people under 35 only being entitled to the Local Housing Allowance shared room rate, the impact of benefit sanctions on vulnerable people, and loss of income and through introduction of Universal Credit all increase the risk of people on low incomes becoming homeless.

Locally this has been compounded by the size of the local Broad Rental Market area (BRMA) which does not reflect local private rents. The aforementioned increase in rates for 2020-21 in response to the Covid-19 epidemic should bring more homes within reach of benefit claimants. However, rates are still below lower quartile rents in the City, and more people are likely to be impacted by the overall benefit cap.

The council continues to work closely with partners to help manage the impacts of reforms.

Delivery of new homes

The government aims to deliver 300,000 new homes per year, with their main priority in relation to affordable housing being to promote low-cost home ownership. However, with a severe shortage of housing and high house prices locally, for people on low to middle incomes buying a home is simply unachievable.

The council was successful in securing funding for 500 new council homes as devolution grant through the Cambridgeshire and Peterborough Combined Authority. 10Building is well under way and discussions for a further delivery programme are taking place. However, only limited grant is available and there are restrictions on how receipts from Right to Buy sales can be spent in conjunction with other sources of funding. This impacts on the ability to develop as well as the rent levels which need to be charged to cover costs of development. The Covid-19 crisis may also affect future delivery plans – both for the council and for other developers.

Care Act 2014

Our strategic and operational approach to homelessness is set within the context of the Care Act 2014, which requires public sector services to work in partnership to deliver preventative services which promote well-being in the community.

Private Rented Sector Reforms

Prior to the Covid-19 outbreak, government had started on a series of reforms to support people in the private rented sector. Changes still to be progressed include 10 Cambridgeshire and Peterborough Combined Authority.

National policy proposals to abolish no-fault evictions; further measures to deal with rogue landlords; and the introduction of an independent regulator for letting agents.

Other Local Policy

Health and Wellbeing Strategy

Housing is well recognised as one of the key determinants of health and wellbeing.

Consultation has taken place on a draft Cambridgeshire and Peterborough Health and Wellbeing Strategy 2019-2023. Relevant proposed areas of focus include preventing homelessness and improving pathways into housing for vulnerable people, improving access to mental health services, and embedding a 'Think Communities' approach into place-based working.

Housing Related Support Review & Homelessness Transformation

A county-wide review of housing related support services in 2018 identified a number of gaps in service provision and recommended some redesigning of services.

Further research was commissioned to consider the potential for 'homelessness transformation' across the two areas. Consultation on a housing related support commissioning strategy has taken place, with the main commissioning priorities over the next few years expected to be around services for homeless adults, rough sleepers, ex-offenders and young people at risk of homelessness. The aim is to move away from a predominantly hostel focussed approach to a wider mix of services.

Priority 1: Support those at risk of homelessness to remain in their homes where possible

Introduction

Early intervention is essential to helping prevent homelessness.

During 2019/20 the council recorded over 200 cases where homelessness was successfully prevented, over 40% of which were outside of the statutory 56-day prevention period.

Our 2019 review of homelessness and rough sleeping in Cambridge has shown that the two most common causes of people becoming homeless in Cambridge are the loss of a privately rented home and family or friends being no longer willing to provide accommodation. Together these account for more than half of all homelessness presentations the council receives in a typical year. However, 2020 has not been a typical year and our most recent statistics show that relationship breakdown and family and friends being unwilling to accommodate on their own now account for the vast majority of homeless presentations.

Other prominent reasons for households and individuals presenting as homeless are eviction from supported housing, the end of a social housing tenancy, and violence (including domestic abuse) and harassment.

Early intervention is less easy to encourage when homelessness is predominantly caused by sudden personal crisis, but it is important nevertheless that we promote the message that homelessness is easier to resolve the earlier people seek advice.

Personal housing plans are also an important tool in enabling people at risk of homelessness to remain in their homes and sustain tenancies longer term.

Preventing loss of private rented tenancy

According to the Census 2011, around 28% of households in Cambridge were living in the private rented sector. More recent estimates, although less reliable, suggest that this could have risen to around 35% and possibly more.

Where tenants have problems paying the rent, the council will signpost to services providing financial advice around issues such as entitlement to benefit, budgeting and dealing with debt. Discretionary Housing Payments may also be used to top up benefit payments for a period, but in coming years we intend to be bolder in our willingness to financially support people to remain in their existing home, recognising that this will often be more financially prudent in the long run for the council, relative to providing expensive temporary accommodation, and will, in most cases, be far better for households facing homelessness.

It is important to recognise that most landlords in Cambridge provide a good service and take a responsible approach when dealing with their tenants. Building on this understanding, we will continue to improve how we engage with landlords, letting agencies and tenants themselves to ensure that all parties are aware of their rights and responsibilities, and can obtain advice and support from agencies when they need it.

Within that context, the council will continue to take a proactive approach where tenants are threatened with eviction. The reasons why tenants will be required to leave will vary, but the council will negotiate with landlords to try to prevent eviction, or to delay it to give time for the tenant to find alternative accommodation. We will also continue to be active in dealing with quality and safety standards in privately rented homes.

Preventing unlawful eviction is also a priority. For example, a significant proportion of section 21 notices have been found to be invalid when they first come to the attention of the council's housing advice service. The council will continue to challenge invalid notices, working with landlords and tenants to try to resolve the situation; and will continue to develop private rented sector advice and support services.

Enforcement powers may be used, although only as a last resort.

Supporting people to remain with family or friends

It has already been mentioned that being asked to leave by family or friends is a major cause of local homelessness. As shown in our homelessness review, in 2018/19, around 1 in 7 households were owed a statutory homelessness prevention or relief duty due to this cause and indications are that, following the pandemic, this proportion is now far greater.

Through its home visiting service, the council negotiates with the parties concerned, and provides and/or signposts to appropriate advice and support to help people to remain where they are for as long as possible. We will continue to develop this role, particularly in relation to mediation between the parties concerned, and the potential for offering incentives to allow people to remain where they are until we can help them find an alternative home. We recognise, however, that there will be situations where the relationship has deteriorated to such an extent that it is unreasonable to expect someone threatened with homelessness to remain where they are.

Preventing loss of social housing tenancy

A comprehensive financial and debt advice service is available to council tenants who may have difficulty in paying their rent. In addition, a bespoke advice service for Universal Credit claimants has been introduced, in recognition of significantly higher arrears often occurring amongst that group than amongst other tenants

The council also runs a tenancy sustainment service aimed at council tenants whose tenancy may be at risk due to complex support needs such as mental health issues, local antisocial behaviour, or a previous history of homelessness. The scope and effectiveness of this service will be reviewed.

The council enjoys good working relationships with its housing associations partners, in particular those with a strong local base. We are, however, aware that we need to improve lines of communication with larger local stockholders with more centralised management and customer services. We will continue, and better promote, more effective early intervention in situations where households in housing association homes are at risk of losing their tenancy, working, in particular, through the existing 'Tenants at Risk' forum of providers and through the new housing providers' network we are proposing as part of this Strategy.

We have been working closely with registered providers in managing the impact of welfare reforms, to help prevent both council and housing association tenants from losing their homes due to issues such as changes in benefit entitlement or switching from Housing Benefit to Universal Credit.

Violence and harassment (including domestic abuse)

The council works closely with partners in dealing with issues such as anti-social behaviour, harassment and domestic abuse. This includes working through both the Cambridge Community Safety Partnership and the Cambridgeshire & Peterborough Domestic Abuse and Sexual Violence Partnership.

Having already achieved White Ribbon accreditation, we have made significant improvements in our approach more recently in dealing with domestic abuse. As a result, the council has now been awarded accreditation through the Domestic Abuse Housing Alliance (DAHA). We will continue to build on this to help prevent domestic abuse from happening and to ensure that we can respond appropriately when it does.

Cambridgeshire, as one of three project sites nationally, has adopted a government funded 'Whole Housing Approach' to domestic abuse. This aims to enable early identification and intervention, reduce homelessness related to domestic abuse, and enable survivors to remain where they are if they choose, or keep their tenancy status if they relocate.

Impact of Covid-19

It is not yet clear what the full impact of Covid-19 pandemic will be on the economy and jobs, but there are already signs that rent and mortgage repossessions will increase. As mentioned, we will introduce mechanisms to support early intervention including prudent, but bold, financial intervention subject to rigorous cost-benefit analysis.

There are also already indications that there may be an increase in mental ill-health and that this may lead to an increased risk of homelessness – for example, through more evictions from supported housing, or through increased levels of domestic abuse.

We are already aware of issues around how reasons for homelessness are captured. For example, loss of a private rented sector tenancy may be recorded as a main reason for homelessness, but is likely to be driven by other factors such as loss of employment, mental health issues etc. The need to deal with the potential effects of the pandemic increase the importance of improving monitoring in this area. A better understanding of the wider reasons for a household becoming homeless or being threatened with homelessness is important to ensure we respond appropriately to individual cases, and to help with prioritising, developing and improving services. 11 Domestic abuse Whole Housing Approach

Supporting those at risk of homelessness to remain in their homes where possible

Moving forward the council will:

Continue to recognise the strong links between mental health, substance misuse and homelessness, and work with the County Council to ensure that service design supports tenancy sustainment and homelessness prevention.

Improve our approach to preventing private sector evictions and to preventing homelessness for people living with family or friends.

Improve engagement with private landlords, letting agencies, social housing providers and tenants; and promote the importance of those threatened with homelessness seeking help at an early stage

Explore further tenancy rescue solutions for private tenants including the potential for targeted grants and loans.
Review the financial advice services available, to identify any gaps, duplication or problems with accessing services.

Review the effectiveness of financial advice and tenancy sustainment services for council tenants.

Seek to set up a working group with other housing providers operating locally, to help agree common policies and approaches and help minimise the number of social housing evictions.

Continue to work with partners on a 'whole housing approach' to dealing with domestic abuse.

Improve how we capture reasons for homelessness.

Improve understanding of what impact of Covid-19 might have on the risk of homelessness, so that we can plan and respond accordingly.

Priority 2: Improve access to and range of permanent accommodation

Introduction

This Strategy has already identified a shortage of supply and high housing costs in Cambridge, and that many people are unable to afford market rents. Access to good quality housing that is affordable is critical to both preventing and relieving homelessness.

For many years, the main route out of homelessness has been through an often- lengthy wait for a social housing tenancy. Our homelessness review identified that in 2018-19, provision of a social housing tenancy was the second most common successful intervention (second only to provision of supported accommodation - dealt with elsewhere in this Strategy). However, with demand outstripping supply, as well as measures to increase the numbers of social homes for rent it is also important to find other ways into more permanent housing.

One of the priorities in our Greater Cambridge Housing Strategy is around making better use of existing homes, which is particularly important in the context of tackling homelessness.

Making private rented sector housing more attractive as an option

The shortage of social housing means that the private sector represents the only realistically available option for many people.

However, there is often resistance from applicants to taking up private rented sector offers, partly because they want the long-term security of a social tenancy but also because there are limited homes available within the City which are affordable, meaning people have to move further out into neighbouring districts.

The council is committed to doing more to make private rented housing more attractive both to potential tenants and to landlords, including better promotion and ensuring people moving into private rented homes receive the advice and support they need.

Our social lettings agency, Town Hall Lettings (THL), is aimed at encouraging landlords (private and Housing Association) to lease homes to the council to be let to those who need them. Any homes let through THL must meet agreed quality and safety standards.

Our Housing Benefit Plus (HB+) scheme offers financial assistance to those on benefits or a low income who, with a little assistance, can be helped to improve their financial situation. It provides a time-limited benefit top-up, in return for which households are expected to engage with financial and employment advice. The aim is that at the end of the top-up period they should be able to afford the full rent without the top-up.

While HB+ has proved successful in helping to both prevent and relieve homelessness, we believe that take up of the scheme could and should be greater. A recent review has identified that the offer should be made more flexible, offering a higher maximum level of supplement, a longer maximum duration of support, and stronger promotion of the scheme by housing advisors and in our homelessness prevention literature. We will also develop and promote targeted financial support to help people remain at home and review the range of financial support services available from all agencies, to understand where there might be gaps or duplication, and to identify reasons for any issues people might be experiencing in accessing services.

In addition to Housing Benefit Plus and Discretionary Housing Payments, our Access Scheme offers interest free loans and, in limited cases, grants, to help people meet the costs of entering the private rented sector. We will launch a pilot to help us decide whether it is more effective, and more financially prudent in the long run, to make the Access Scheme one where all assistance is in the form of a grant. We are also prepared to guarantee rents for a period or pay a lump sum covering several months advance rent to a landlord, where this will open up the sector to people who can afford the rent but are barred from entering it due to an unconventional employment or credit history. In summary, we are open to considering on a case-by- case basis any approach that might enable more people to gain and sustain a private sector tenancy, subject to two key considerations: will this prevent or relieve a household's homelessness; and do we have reasonable assurance that it will cost less, or certainly no more, than the cost of providing emergency and temporary accommodation.

Good, affordable privately rented accommodation is to be had a short distance out of the city, but some homeless households are resistant to an out-of-town offer, often for reasons that are understandable, but which might be overcome with a relatively small additional increment of support or assurance. In the early period of this strategy, we will explore the potential costs and efficacy of practical support measures such as subsidising for a limited period travel back into Cambridge for work, support or

medical services; support to find employment or training in the new location or innovations such as households retaining a time-limited local connection to Cambridge or gaining an enhanced banding on Home-Link.

Working with private landlords

With high demand for rental properties there is a reluctance amongst some landlords to accept people on benefits on the basis that they may be at higher risk of not being able to pay the rent.

Town Hall Lettings offers a guarantee to landlords letting homes through the agency that rents will be paid. The council also offers loans to owners to bring long-term empty homes up to standard so that they can be let through THL. As mentioned, we are prepared to offer additional incentives, including advance rental loans paid directly to landlords, but we need to improve our approach to publicity in this area to try to encourage more landlords to participate.

Whilst we have good relationships with many private landlords and letting agents, there is still a need to improve communication, engagement, and partnership working.

Broadening the range of housing available

The undoubted preference of people unable to buy a home of their own is to rent a home from a social landlord and the council is committed to making this option available whenever possible. The Greater Cambridge Housing Strategy gives more information how the council is increasing the supply of social housing, both through the council's own new build programme and through working with developers and other housing providers.

However, as well as a shortage of supply, there is also a mismatch between the size and type of stock available and the needs of people on the housing register. The council therefore needs to consider diversifying how its own new build homes are designed and used, as well as the use of existing homes.

For example, 80% of demand on the housing register is for one- and two-bedroom homes, with over half of applicants requiring one bedroom. However, studios and one-bedroom homes make up only 25% of the council's own housing stock, with 35% being two-bedroom homes. 12 12 Strategic Housing Key Facts

Because of this, the focus of the council's new build programme to date has been on smaller properties, although providing some larger homes also in recognition of lower turn-over of family homes and the need to create mixed communities.

Moving forward, we are exploring the need to provide more specialist forms of housing to help meet the specific needs of homeless people. For example, increasing provision of self-contained accommodation as a steppingstone to a full tenancy, or piloting provision of small blocks with some form of on-site supervision.

Alternative options for use of new and existing homes are being considered. One example is leasing homes to the council's Housing Company for use as Houses in Multiple Occupation. This could include existing council homes and/or market homes delivered as part of the council's development programme. There may also be the potential for leasing short-life and/or low demand homes from other housing association partners.

Potential conversion of surplus commercial property to good quality homes through our Housing Development Agency is another area to be explored; particularly in the context of the potential impact of Covid-19 on future demand for office space.

We are also keen to explore securing some private rented homes to be offered through the Home-Link choice-based lettings system to applicants who may be homeless or at risk of homelessness but not in priority need.

Improving access to social housing

Some social housing providers have allocations policies which, in effect, can reduce the number of homes available for those with high levels of need. Building on the good relations we have with local providers we need to work with them to try to increase access to housing for those most in need and assess whether we can achieve better alignment between council and housing association allocation policies.

We also need to work with providers to establish whether better use can be made of existing homes, including potential for flexing tenures in some circumstances where that would better meet the needs of the council and of the provider.

This is likely to be more of a challenge in relation to some of the larger and less locally focused associations, with whom we need to improve lines of communication.

Bespoke Local Lettings Plans (LLPs) for particular developments, both council and housing association, can also have the effect of reducing the number of areas where those with high needs can be housed.

We need to review the council's own suite of Local Lettings Plans to understand the overall impact across the City and whether a change in approach is required. We have also identified in our Housing Strategy the need to develop a Local Lettings Plan framework to try to achieve greater consistency of approach between the council and other providers, and to ensure LLPs are not overly restrictive. T

here is also the need to review how we implement the policy in relation to applicants with outstanding debts being excluded from an offer of a social housing tenancy.

Improving access to housing for people on middle incomes

One of the potential impacts of Covid-19 on the economy is that households previously on middle incomes could become more at risk of homelessness. We will consider how the council's own development programme might be able to help in providing private sector accommodation at sub-market levels, as well as at market rents to help cross-subsidise the wider new affordable housing programme.

Lettings policy

The council is part of a sub-regional lettings policy which operates across six different neighbouring councils. Under the policy, homeless applicants to whom the councils owe the 'main' homelessness duty are awarded Band A (urgent need) priority.

Having a consistent policy which suits the needs of all partner authorities is inherently challenging, as needs in Cambridge are clearly different to those of some of the other districts. For example, as already highlighted the council is increasing the range of alternative housing options in addition to social housing; and rough sleeping is also a particular issue for the City.

The council will review the current policy and its impacts and consider whether being part of the current sub-regional approach is the best way of meeting local needs going forwards. Examples of issues to consider include: the priority given to statutorily homeless applicants on the register compared with the priority given to other groups including those at risk of becoming street homeless; how local connection criteria are applied; whether more priority should be available for multi- generational households or house-sharers; whether the offer to middle-income households should be improved; and whether those willing to take up a private rented sector offer should be awarded a higher priority banding.

Improving access to and range of permanent accommodation

Moving forward the council will:

Explore how access to homes across a range of tenures might be improved, and how homes might be used more flexibly to meet a wider range of needs.

Encourage take-up of private rented sector housing options, including out of town lets, through better promotion, considering additional incentives and improving support available.

Improve engagement and partnership working with landlords, letting agencies and other private owners.

Consider whether additional incentives may be needed to improve the availability of private rented homes through Town Hall Lettings.

Review the council's Housing Benefit Plus scheme with a view to making it a more attractive option.

Work with housing providers to explore how better use might be made of existing homes

Work with housing providers with a view to increasing access to housing for those with high levels of need, and better alignment of council and other providers' allocations policies.

Investigate the feasibility of delivering more specialist forms of housing, and homes for people previously on middle incomes who may be at risk of homelessness, through the council's house-building programme.

Investigate potential for conversion of commercial property to good quality accommodation through the council's housing development programme.

Review the council's approach to Local Lettings Plans in the context of access to housing for those with high levels of need.

Review whether continuing to subscribe to the sub-regional Home-Link lettings policy can continue to meet Cambridge City's needs.

Priority 3: Minimise use of temporary & emergency accommodation

Introduction

However effective a homelessness service may be, there will always be situations where homelessness cannot be prevented and a household in need must be found an emergency or temporary home. The use of emergency accommodation – usually, in Cambridge, a local hotel – or the provision of a home intended to be occupied for a temporary period, is not necessarily a bad thing and, indeed, may be considered a necessary and commendable part of any authority's range of measures to help households in housing crisis. It is, however, undoubtedly a bad thing if the emergency or temporary accommodation maintains a household in unsuitable accommodation for a lengthy period - especially if there are children in the household - and if the numbers in temporary accommodation are high relative to the supply of permanent homes.

As well as being a bad deal for homeless households, temporary and particularly emergency accommodation is a bad, high-cost deal for housing authorities.

Cambridge tries to minimise these problems by using its own council housing as temporary accommodation. At the time of writing our temporary stock numbers just over 100 units, the vast majority of which is owned by the council (our use of single homelessness and rough sleeping hostel accommodation is dealt with elsewhere in this strategy).

Use of temporary and emergency accommodation

Following introduction of the Homelessness Reduction Act 56-day homelessness duty period, the numbers of people needing to be housed in temporary accommodation peaked in 2019/20, with families making up the largest proportional increase. The Covid-19 lockdown has since led to a fall in numbers, although this is expected to rise again following lifting of the temporary suspension of court proceedings. Rough estimates suggest that the council could see an increase in demand in the order of around 20% over pre-lock down numbers.

Length of stay has also increased, with some households waiting more than the statutory 56 days before being rehoused.

As mentioned, there are occasions when use of commercial hotels is unavoidable. This may sometimes mean people having to be located outside of Cambridge.

A special case of temporary accommodation has been our response to the Covid-19 pandemic. Here, the council initially secured temporary use of a number of hotel rooms so that rough sleepers unable to isolate might be kept safe. We have more lately commissioned former student accommodation for this purpose. By December 2020, the council had housed over 200 people. At its peak there were 140 people under cover falling to around 60 by the end of the year. A commitment has been made to find a permanent home for everyone willing to work with us, and we have a target to have no further rough sleepers in Covid accommodation by April 2021.

Reducing reliance on temporary accommodation

As has been mentioned several times in this strategy, a key future objective is to prevent households from becoming homeless, in turn reducing our need for, and reliance upon, temporary accommodation. Priorities dealt with elsewhere in the strategy, such as supporting people to remain in their homes, securing better access to permanent accommodation, and understanding how the current lettings policy may be impacting, are all important in trying to reduce reliance on temporary housing. In addition, the council needs to consider and/or enhance the use of other solutions, such as direct lets to homeless households outside of the Home-Link choice-based lettings system and reviewing the extent to which housing related debt should remain a barrier to being offered a home.

We also need to better monitor the speed of decision making on homelessness cases and how quickly we are able to bring an interim accommodation duty to an end. In addition, we need to keep decisions to place people in interim accommodation under regular review to ensure consistency of decision making.

It is also important to ensure that benefit claims are processed as swiftly as possible.

Although we need to reduce use of commercial hotels overall, we also need to explore opportunities for bringing in different types of commercial provision; in particular, for high need households for whom standard provision is unsuitable.

Minimising use of temporary and emergency accommodation

Moving forward the council will...

Further develop our existing plan to reduce reliance on the use of temporary and emergency accommodation.

Continue work on identifying reasons for the recent increase in use of and length of stay in temporary accommodation, and keep information on demand under regular review.

Improve our approach to monitoring of pathways through interim accommodation, and regularly review placement decisions to ensure consistency in decision making.

Get a better understanding of the of the sizes and types of temporary and emergency accommodation needed.

Continue to look for alternative ways of providing temporary and emergency accommodation, including for those for whom standard provision is unsuitable.

Make use of council owned homes where appropriate.

Ensure that rough sleepers housed temporarily in hotels are moved into appropriate accommodation in a planned way so that they do not end up back on the streets.

Review the extent to which housing related debt should remain a barrier to being offered a home.

Priority 4: Improve access to and effectiveness of support services

Introduction

Whilst access to accommodation is essential for preventing and relieving homelessness, it is only part of the solution.

A significant proportion of households and individuals seeking housing advice and facing homelessness have a need for some form of additional support if their issues are to be addressed. Our Homelessness Review identified that of 1078 presentations in 2018-19, around two thirds were recorded as having support needs. Mental health support was the most common one recorded as a primary need, but many will have had multiple needs. Lack of appropriate support for such individuals or households increases their risk of being made homeless for the first time or becoming caught in a cycle of homelessness.

Public service cuts over recent years have taken their toll in terms of preventative services and are thought to be a key contributor to the numbers of people with high level and/or multiple support needs becoming homeless or sleeping rough.

Improving joint working

Working closely with partners is key to helping people avoid homelessness, or at least the worst effects of homelessness. Under the Homelessness Reduction Act 'duty to refer', partnership working is now effectively a statutory requirement.

The council involves and supports – in some cases financially - a whole range of organisations in dealing with homelessness, including statutory agencies, contracted services, other housing providers and the voluntary sector. Single homeless and rough sleeper support, drug & alcohol services, supporting prison leavers, and services for those experiencing or at risk of domestic abuse are just a few examples. It is also important to ensure that people can access more generic services, such as those providing services such as: financial advice; access to education, training and volunteering/employment opportunities; and cultural & leisure activities.

The council has a long history of partnership working in relation to homelessness, with a strong commitment across most partners to work together. However, there is still significant need for improvement. All too often issues such as gaps in services, lack of resources, inadequate working protocols and absence of rapid referral routes can lead to people falling through the cracks. In some cases, duplication of services also needs addressing.

Mental health and substance misuse support is a particular area where working needs to become more joined up. Another area is in dealing with homelessness and anti-social behaviour linked to misuse of drugs and alcohol.

It is important that all partners, including the council as the housing authority, have clearly defined roles and a clear and agreed direction of travel in relation to preventing and tackling homelessness. Building on the improved understanding gained through our response to Covid-19, we need to review how non-commissioned voluntary services can be more effectively integrated with statutory and commissioned services.

Collaboration at a strategic level needs to be improved – particularly amongst statutory services – to ensure that those with a complex range of needs can receive the support they need. A list of key partners is at Annex 2.

Homelessness Transformation

The homelessness Trailblazer service has taken joint working a step further forward over the last few years. Part of a multi-agency partnership across Cambridgeshire and Peterborough, involving public, private and voluntary sector partners, it helps prevent people from becoming homeless by helping them to help themselves before they hit crisis point. Its main aim is to make homelessness the 'unacceptable outcome'.

However, more of a 'whole system' approach across services, agencies and the wider community will be needed if we are to achieve maximum effectiveness around homelessness prevention.

As a result of the recent county-wide Homelessness Transformation research (referred to previously in this Strategy) one of the recommendations the councils involved are exploring is the feasibility of having a fully integrated multi-disciplinary homelessness service across a range of agencies. Any proposals in this area would require full commitment to joint working from multiple partners, potentially including some co-location of services.

A key element of this from Cambridge City Council's point of view will be to ensure that the City's needs, as well as those of the wider Cambridgeshire and Peterborough area, can be appropriately met.

It will be important to engage not only partner agencies but also service users and the wider community in designing any new services.

Improving access to and effectiveness of support services

Moving forward the council will...

Explore how working arrangements with mental health, substance misuse and social/ social care services can be improved, including investigating the potential for some co- location of services and/or development of multi-disciplinary teams.

Strengthen work with partners to provide a joined-up approach to preventing and tackling drug and alcohol related anti-social behaviour.

Improve monitoring of the underlying reasons for homelessness, to help inform service design, planning and operation.

Work to improve collaboration with statutory partners at a strategic level, including working with the County Council and other partners to explore the potential for a fully integrated, multi-disciplinary homelessness service across a range of agencies.

Priority 5: Prevent rough sleeping

Introduction

As previously highlighted, prior to additional temporary accommodation being provided in response to Covid-19, rough sleeping had become a growing and more publicly visible issue over recent years.

However, homelessness and rough sleeping, although often overlapping, are not necessarily the same thing. There are many people who are homeless who do not sleep rough, and some rough sleepers are known to have permanent homes, or at least a bed in a hostel or other temporary accommodation.

Similarly, street begging involves individuals who may or may not be sleeping rough, again some of whom are known to have access to accommodation.

The council has had a long-standing target of keeping rough sleeping numbers to fewer than 10 (as measured by street counts now carried out six times a year). However, 33 were identified in the autumn 2019 count and even in November 2020 when there remained more than 60 former rough sleepers in Covid emergency accommodation 16 people were found sleeping rough on the night of the count. 166 separate individuals were recorded as sleeping rough in Cambridge between April 2019 and March 2020, against a target of fewer than 135.

Our Homelessness Review identified that well over half of rough sleeping individuals identified in Cambridge over the period of a year appear to be new to the streets that year.

This is a complex area with no single solution. It is essential that we do all we can to promote early intervention to enable people to access accommodation and appropriate support and other services to reduce the risk of them moving onto the streets.

Profile of rough sleepers

Rough sleepers and people at risk of rough sleeping tend to have multiple and complex needs, with a high proportion of rough sleepers in Cambridge having severe mental health problems and/or alcohol and substance misuse issues, including use of Class A substances. National research also shows that they tend to have higher rates of long-term physical health and mental health problems compared with the general population.

Other National research also identifies life experiences, threat of violence or abuse and lack of family and/or other support as just a few of the potential contributory factors.

Street homelessness disproportionately affects males, those who have experienced trauma, and those leaving institutional settings such as care and prison leavers. Although unlike some other areas there appear to be relatively few street homeless people in Cambridge who have been in the armed forces.

Around 1 in 5 Cambridge rough sleepers using Covid-19 hotel provision were identified as foreign nationals, many of whom were thought to have no recourse to public funds. However, our targeted work with those from the European Economic Area (EEA) has shown that it is possible to help those willing to work with us to find employment or otherwise gain pre-settled or settled status, allowing them to continue to live and work in the UK and access healthcare and any social security benefits they may be eligible to claim. We will build on the insights gained from this exercise so that we can assist any potentially eligible rough sleepers and will consider new eligibility rules following the ending of the transition period following Britain's departure from the European Union.

Setting targets for rough sleeping

As previously stated, it is unlikely that we will be able to completely eliminate rough sleeping in Cambridge by 2027 in line with government aspirations. We propose a local target of fewer than 10 rough sleepers picked up in any one count by 2022, moving to fewer than five throughout the lifetime of this Strategy. We will also set a demanding target for the duration a person found rough sleeping remains on the street before being housed. This target will form part of the service specification for the proposed Streets to Home service.

Early up-front prevention

To help young people to understand the implications and risks of leaving home without alternative accommodation being available, the council has formerly supported a programme of education within local schools, colleges and specialist young

persons' accommodation. We now think that a better approach is to target those likely to be at highest risk, and to better engage both young people and parents/carers at an early stage before the risk of homelessness arises.

We also need to improve how those at risk of rough sleeping are identified to help prevent the flow of new rough sleepers onto the streets.

Young people leaving care

There is a strongly recognised link between rough sleeping and having been in local authority care. In Cambridge in 2016 just under 1 in 5 rough sleepers were found to have been in care at some point in their childhood. This broadly reflects earlier national research which estimated a figure of around 1 in 4.

It is essential that partners work effectively together to manage the transition between care and independence. There is a joint protocol between Cambridge City and Cambridgeshire County Councils for the assessment of 16 and 17 year olds, and we are also in the process of finalising a joint accommodation pathway protocol for care leavers.

For these protocols to be effective, they need strong and sustained commitment on all sides, and we need to ensure that they become fully embedded in the practice of all partners.

Prison leavers

Homelessness prevention visits are made to people due to leave prison, but by the time the council is aware of someone being discharged it is often too late to provide effective homelessness prevention support. We will continue to work with the Police & Crime Commissioner and with prison and probation services to improve the approach to prison discharge, including considering extending the use of video links to carry out virtual housing assessments (introduced in response to Covid-19), and reviewing and revitalising the existing discharge protocol.

We also need to explore how links with each of the local prisons can be improved, and how individuals' housing needs can be identified and addressed at an earlier stage.

Access to accommodation

There is no statutory requirement to provide temporary accommodation for single people not thought to be in priority need. This, combined with a shortage of suitable housing, means that people with no place to stay are at risk of moving onto the streets. The council's Single Homelessness Service assists single people not in priority need but at risk of homelessness and rough sleeping to quickly gain a secure home. So far, the scheme has assisted over 500 single people into private rented sector housing, but as highlighted elsewhere in this Strategy, lack of appropriate and affordable accommodation remains a challenge.

In terms of short-term accommodation, there is a need to explore, county-wide, how an emergency accommodation offer can be made available for anyone sleeping rough across Cambridgeshire and Peterborough.

Reducing the 'pull' of the streets

As mentioned previously, some people who live on the streets already have access to accommodation. For many people it is difficult to understand why people would 'choose' to live on the streets as opposed to living in settled accommodation or taking up a hostel place.

National research has identified that as well as 'push' factors (such as eviction or abandonment - e.g., through poor housing conditions or threat of violence/abuse) other 'pull' factors are also influential. This may include a sense of community on the street, compared with boredom and isolation living alone. A recurring theme was the absence of both informal support (from family and friends) and formal ongoing support.

Local consultation has also identified that one of the benefits of living on the street is the ability to raise money through begging.

We need to improve public awareness of alternative ways of giving – including through Cambridge Street Aid, which funds individually tailored grants to help people to move off the streets.

We need to work with public health to try to tackle the root causes of begging, which are often related to drug and alcohol dependency issues. We also need to work with the police and other partners to explore how enforcement against begging and street-based anti-social behaviour can be improved in parallel with improved provision of accommodation and health and support services.

Reconnections policy

Cambridge as a well-renowned city attracts people from across the region, the country, and indeed the world, some of whom sadly end up sleeping on the streets. This inward migration of rough sleepers is one reason why, prior to the Covid accommodation effort, numbers sleeping rough remain stubbornly above our target of ten.

The council has for many years had a policy of encouraging rough sleepers not connected to Cambridge to return to places where they may have family and friends able to support them. But individuals are free to choose where they live in an open society and there is an understandable and, probably, irreconcilable tension between making sure that we care for everyone who lands on our streets and seeming to encourage people to migrate to a city where services are good and local people are welcoming and generous.

One avenue we will wish to explore in the lifetime of this strategy is to work with our neighbouring local authorities, especially South Cambridgeshire District Council, to develop joint approaches to a shared rough sleeping problem which is sub-regional in origin but often manifests itself on the streets of Cambridge.

An ambition we will pursue under this strategy will be to gain a better understanding of where rough sleepers are coming from so that we can improve our approach for reconnection within the context of duties under the new Homelessness Reduction Act

Preventing rough sleeping

Moving forward the council will...

Improve our understanding of the nature and causes of rough sleeping in Cambridge.

Work with partners to understand how prevention activities as a whole can help identify those at risk of rough sleeping and help to intervene early to prevent the flow of new rough sleepers onto the streets.

Gain a better understanding of where rough sleepers have come from, develop a more proactive approach to reconnecting rough sleepers to where they came from, and review the offer available to those without a local connection.

Aim to keep the number of rough sleepers below 10 for any one count, reducing to five through the lifetime of the strategy; and agree additional targets around length of stay and time taken to make a housing offer.

Work with partners to explore how an emergency accommodation offer can be made available for anyone sleeping rough across Cambridgeshire and Peterborough.

Review the current approach to education around homelessness prevention amongst young people.

Review the current approach to street begging and anti-social behaviour.

For people thought to have no recourse to public funds, ensure help is available for those who may wish to apply for pre-settled or settled status.

Promote and support effective implementation of the young people's assessment and care leaver protocols across all relevant partners.

Review the prison leavers' protocol and identify how prison leavers' housing needs can be identified and addressed at an earlier stage.

Work with South Cambridgeshire District Council to help prevent single homelessness within their district.

Priority 6: Break the cycle of chronic and repeat street homelessness and rough sleeping

Introduction

Once people have started sleeping on the streets there is a high risk of remaining there and we need to improve approach to stopping people getting caught in the 'revolving door' of street homelessness and rough sleeping.

Rough sleeping tends to last longer than other forms of homelessness and is much more likely to be cyclical. One London study in 2017-18 found that one-in-six people sleeping out in the capital in that year had returned to the street after a gap of at least a year.¹⁹ This same pattern is familiar to us here in Cambridge.

Locally, although the majority of rough sleeping appears to involve those new to the streets in the last year, there are also significant numbers who have either returned to the streets or are 'entrenched' as rough sleepers.

There is also a surprising number of individuals who, having been found a home, remain deeply involved in the life of the streets, mixing intermittent rough sleeping with nights spent in their own home, often hosting associates from the streets - not always willingly.

It is often overlooked that for some rough sleepers the price paid for gaining a home is boredom and isolation, prompting disinterest in maintaining a home, the continuation of a street lifestyle and sometimes the abandonment of the accommodation. It is a strategic aim for us to better understand these factors, including the extent to which befriending schemes, skill sharing and peer support may help to anchor people in the home and neighbourhood. We will also want to analyse whether the alternative accommodation options we are developing - particularly our small, dispersed developments of compact modular homes and our experimental 'supported shared' homes where two friends live together – might better suit people with a street past than conventional one-bedroom flats which have hitherto been our best offer. Our innovative Housing First (HF) scheme which links two purpose-built HF flats to a third housing a 'good neighbour' is a further response to our current understanding of why people sometimes return to the street. Four flats over two schemes are anticipated to be completed in 2020-21 with a further five planned to be completed the following year.

Improving hostel capacity

Although hostel accommodation does not suit everyone, it has an important part to play in supporting people off the streets and helping them to prepare for the move towards more permanent accommodation.

Around 345 beds are available in the city in hostels and dispersed 'move-on houses'. This is a significant number for a relatively small city, and we think adequate to meet the needs of the local rough sleeper population; although we need to better understand what an appropriate balance is locally between hostel and permanent housing provision.

However, there is an issue around the rate at which hostel places become available for new rough sleepers. Residents are expected to move on within two years, but a number stay for longer. Also, for some, two years may be too long to remain in an institutional setting.

While there are exceptions, the usual route into a mainstream homelessness hostel is through Jimmy's Assessment Centre. Slow rates of move-on from hostels affect the rate at which rough sleepers can move from Jimmy's, which in turn affects the rate at which people on the street can get a bed in Jimmy's.

More post-hostel accommodation and promoting and making private rented sector alternatives more attractive are needed if we are to move people through the hostels more quickly. We will also develop additional home-based support for people leaving hostels who feel they are still not ready to live independently.

We need to work with providers and other partners to help people move on more quickly. As well as advice and support to the services concerned, more challenging move-on target times are likely to be needed, as well as improvements in how progress through the system is monitored. There is also a need for better up-front information for residents and support workers on the range of accommodation and support options available to them.

Move-on discussions with individuals need to start as soon as possible after they have moved into a hostel and their position has stabilised. A 'Streets to Home approach' as proposed below could play a major part in this, to ensure that hostel discharges are well planned and accompanied by appropriate treatment and support.

South Cambridgeshire and Huntingdonshire District Councils currently have equal access, with Cambridge City, to hostel places in the City. With high levels of need just within Cambridge itself we need to consider the potential for reciprocal accommodation arrangements with other districts and support them to help increase hostel capacity with their own districts.

Although it is important to move people on, it is just as important to avoid unplanned move-on wherever possible, including through abandonment or eviction. Whether being excluded from moving to more permanent accommodation due to previous breaches of tenancy can be prevented also needs to be explored. We need to work with accommodation providers to review how incidents of eviction and abandonment can be reduced.

We need to work with the County Council to weigh up the advantages and disadvantages of hostel accommodation compared with other housing options, to consider what balance of provision should be available moving forward.

Improving suitability of hostel accommodation

We need to ensure that the supported housing available to individuals is suitable to for those presenting with complex needs. We will work with partners to review the scope and effectiveness of support provided in hostels, including in relation to move-on advice.

We also need to work with the County Council in considering the need for commissioning longer term supported provision for those for whom mainstream housing with support may not be suitable.

Access to housing

As highlighted earlier, expanding access to homes that are affordable is an important part of the solution to preventing homelessness and keeping people off the streets.

We have already mentioned our Housing First model of accommodation for those with complex needs who are rough sleeping or have a history of repeat homelessness.

HF is not a panacea, but national and international research has identified it as being very effective for people for who have serially failed to maintain a hostel place or who refuse to go into a hostel. By some accounts it can also be a more cost-effective solution than hostel provision.

We plan to have 14 Housing First homes occupied by the end of 2020-21 with a target have a total of 24 HF homes of different types in this first phase of the project. At that point we will pause and review how successful HF has been - both for individuals and the wider community - and whether the programme should be expanded. We will also consider whether we can develop a private sector model of HF; our current project is based on social sector accommodation.

We are conscious that there is a tension between providing self-contained social accommodation through both HF and the HARP process, and negative perceptions of fairness among the wider number of applicants looking for a social home. Research on the views of hostel residents has identified that, understandably, most want social housing rather than a private rented tenancy, but we have been working, and will continue to work, to counter perceptions that a social tenancy is the only, and guaranteed, route out of homelessness or a hostel. The best antidote to this perception is for us to be able to demonstrate that a private rented option is a good and financially viable option and, as has been mentioned, we now have a wide range of schemes to make private renting easier, affordable and sustainable. We will continue to promote private renting to people needing to leave hostels and we will be reviewing our HARP process to see whether it might be expanded to include the offer of a guaranteed affordable private let rather than a social home.

The effect of our current approach to Home-Link applicant banding and moving towards more homes offered through Housing First is that around 20% of one- bedroom homes and 10% of all homes available through Home-Link are being let to single people with a street homeless background. Although it is important that housing is provided for this group, it does mean that others are having to wait much longer for a home, and it also presents challenges in achieving mixed and balanced communities to help meet our broader strategic housing objectives.

The position we want to achieve is that a social home will be available for people who have been street homeless, or who need to move on from a hostel, whenever there is an attested need for that this kind of tenure rather than a (perfectly understandable) preference for a social home.

We acknowledge a clear need for a flexible range of accommodation types for this group. Accordingly, the council has supported partners in the delivery of six modular units on Newmarket Road which are now occupied. In our market testing with

rough sleepers, fully self-contained but compact (around 25 metres square) modular homes scored very highly in terms of desirability and so we have also embarked on our own programme to provide up to 16 further modular homes on three council- owned sites across the city. These units have been donated by our development partner, Hill. This activity has taught us that it takes time to get modular homes through the planning process so we will look at whether an 'off the shelf' planning brief can be developed to help speed the process for any future developments.

We will investigate opportunities to work more collaboratively with other housing providers on projects to help prevent and tackle homelessness in addition to provision of social housing tenancies. This includes exploring whether there are opportunities for making use of any short-life and/or low demand social housing properties available – for example to single sharers or for general needs housing - through Town Hall Lettings.

We will also explore the potential for self-build and/or self-managed co-operative housing models for people who have been on the streets.

Streets to Home service

A major focus up to now has been on providing services, such as day centre facilities, health services, education & skills development, welfare checks etc, to those living on the streets. There are also many informal voluntary and church-based services offering food, clothing and bedding to those living a street-based lifestyle. Rather than simply supporting people to remain on the streets, a major shift in approach is required if the cycle of street homelessness is to be tackled effectively.

The council is working with Cambridgeshire County Council and other partners to commission a comprehensive 'streets to home' service with the aim of helping people sleeping rough to rapidly get off the streets and into accommodation. Under a model which we are presently developing through consultation with service users and partner agencies we envisage there will be 'link worker' who will remain engaged with an individual throughout their journey from streets to home. This worker will not necessarily themselves provide services but will ensure that the individual is supported to get what he or she needs in what is inevitably a complex and sometimes challenging period of transition. Streets to home will view all rough sleepers as people with agency and ambitions for a better life. Accordingly, the starting point will be a thorough assessment of circumstances, need and the rough sleeper's own ambitions and goals, leading to an action plan agreed with, and shaped by, the rough sleeper themselves.

Once settled, new types of support services will be required which are tailored to individuals' needs, to help prevent people from returning to the streets.

To be successful this will depend on close collaboration with partners, including health and social care related support services, the voluntary sector, businesses and the wider community. We will also need to work closely with existing street-based services and with service users themselves to identify what role they can play in designing and facilitating this shift in approach.

Working with the wider community

There has been considerable interest from the wider community in trying to deal with the problem of street homelessness and rough sleeping.

The community group It Takes a City (ITaC), along with other informal voluntary support services, have helped to enable a strong and collaborative approach to getting people off the streets in response to the coronavirus pandemic. We are strongly committed to building on this positive work, working with the community to help find more permanent housing solutions for rough sleepers and to help shape and implement new ways of working.

Among the things the experience of Covid has illuminated is that statutory and contracted services cannot do it all and that the value well-motivated, organised and properly integrated groups in the local community can add has the potential to be enormous. Accordingly, we intend to work with ITaC and other groups to support befriending, mentoring and skill-sharing initiatives.

It is also important to continue to increase public awareness of the issues involved and how they can help in keeping people off the streets.

Breaking the cycle of chronic and repeat street homelessness and rough sleeping

Moving forward the council will:

Work with providers to help speed up move on from hostels, whilst at the same time reviewing how evictions and abandonments can be reduced.

Work with providers to review the scope and effectiveness of hostel-based support, particularly in relation to move-on advice.

Explore whether being excluded from moving on due to previous breaches of tenancy can be prevented.

Work with sub-regional authorities to help improve City access to existing hostel beds.

Work with the County Council to assess what balance between hostel and other accommodation might be appropriate going forwards.

Promote and make private rented housing a more attractive option, to help make it available to a wider range of applicants.

Review the effectiveness of the Housing First model of provision and explore whether it should be extended to include private rented sector homes.

Explore with social housing providers whether there are opportunities for short life or low demand social housing available, including to single sharers.

Expand the provision of modular homes, and explore other innovative ways of providing accommodation to prevent and relieve single homelessness.

Continue to seek and make best use of funding opportunities to purchase new homes to accommodate rough sleepers.

Work with the County Council in considering the need for commissioning longer term supported provision for those for whom mainstream housing with support may not be suitable.

Work collaboratively on shifting emphasis from a mainly streets-based towards more of a home-based service model.

Funding the Strategy

As has already been highlighted throughout this Strategy, the work of partners is fundamental to meeting the proposed objectives and priorities; and each will, to a greater or lesser extent, have their own funding streams to draw upon.

For the council itself, the main sources of funding for dealing with homelessness and rough sleeping are a combination of its own resources together with government grant. The following is a list of what is currently available to support our work around homelessness and rough sleeping.

- Council General Fund resources
- Housing Benefit (for stays in bed & breakfast and Cornerhouse temporary accommodation)
- MHCLG flexible homelessness support grant
- MHCLG Homelessness Reduction Grant
- MHCLG Rough Sleeping Initiative Grant
- MHCLG Covid-19 rough sleepers contingency fund grant

Many of the government grants available for homelessness and rough sleeping require submission of bids for projects which meet the specific aims of that grant funding pot. The council will continue to work with partners to assess whether any funding which comes available can be used effectively to help meet the objectives in our Strategy, and to bid for funding where appropriate. The council will aim to write a series of 'off the shelf' bids which will enable it to act swiftly when bidding opportunities (which often have short timeframes for response) arise.

The full financial impacts of Covid-19 on local and national government spending, and funding available to other partners are not yet fully understood. This may of course pose risks to the extent to which some of our objectives can be met, at a time when a further increase in homelessness and rough sleeping is also highly likely. This makes it more important than ever that we take every opportunity to maximise and make best use of any resources available now and in the future.

Implementing and Monitoring the Strategy

This Strategy will be accompanied by a detailed action plan, which will be outcome focused, with clear targets for delivery. (See Annex 6).

Delivery of this action plan will be overseen by a multi-agency Homelessness Strategy Steering Group, supported by existing operational partnerships and reporting through council governance arrangements. Existing partnerships will be used wherever possible rather than creating new structures.

Annexes

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Cambridge City Homelessness & Rough Sleeping Strategy (2021 – 2028)

Local Action Plan

July 2026 – March 2028

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Introduction & context

This two-year plan outlines Cambridge City's delivery priorities for preventing and responding to homelessness between June 2026 and March 2028. It supports the Council's updated Homelessness and Rough Sleeping Strategy, using the strategy's six priorities as the framework for action.

The plan should be read within the context of the Greater Cambridge Housing Strategy, which sets the broader context for housing supply, affordability, social housing and access to the private rented sector. It also links to local partner arrangements led by Cambridgeshire County Council, Cambridgeshire & Peterborough Combined Authority (CPCA), the ICB and NHS partners, housing providers, the voluntary and community sector; and the Cambridge Homelessness Charter.

This plan will be delivered during a period of uncertainty and change, with the region progressing through Local Government Reorganisation and transitioning to new unitary authorities and geographical footprints. Actions and delivery areas have therefore been prioritised with this in mind, and the plan is deliberately practical and selective.

The plan should be read in conjunction with the accompanying long-term rough sleeping partnership plan, which outlines the activity addressing this specific area of homelessness in more detail, set to be published in December 2026.

Principles and values

This action plan is grounded in the local Charter to End Homelessness, including the shared ambition for Cambridge to be "a city where everyone has somewhere to call home", and to make homelessness rare, brief and non-recurring. The plan recognises the Council has statutory duties and a clear leadership role, but that ending homelessness also depends on the wider city working together around common priorities.

The Charter has six pillars of change: Data, Information, Housing, Support, Health and Employment. These pillars should guide our approach and help ensure this is a city-wide plan for prevention, recovery, independence and sustained routes out of homelessness.

The Council and partners will focus on practical action, shared ownership, lived experience, evidence, dignity and accountability. Charter partners will be invited to contribute to and own relevant actions, and the aim is to use Cambridge's civic assets in a focused way to deliver the plan's priorities.

Strategy and priorities

Cambridge City's Homelessness and Rough Sleeping Strategy is organised around six priorities. These continue to provide the framework for the city's approach to homelessness and rough sleeping, with the recent strategic review (Feb 2026) evidencing where we need to focus during the remaining years of the strategy's timeline:

Strategic priority	Prioritised review recommendation (2026 – 2028)	Rationale from the review
1. Support those at risk of homelessness to remain in their homes where possible	Pilot use of predictive analytics to identify and support early at-risk households, focused on PRS sustainment and financial shocks	The review found that Cambridge has strong crisis-response services, but that demand is increasing and prevention outcomes are inconsistent, particularly for single people and households affected by PRS insecurity, rent arrears, financial shocks and repeat presentations. Without stronger early intervention, more households are likely to reach crisis point and enter temporary accommodation or relief duties.
2. Improve access to a range of permanent accommodation 3. Minimise the use of temporary and emergency accommodation	Test a refreshed PRS access model with revised incentives, risk-sharing and clearer landlord offer	The review found that move-on options are constrained, social lettings are declining and the private rented sector is becoming harder to access. This limits the Council's ability to prevent and relieve homelessness and creates blockages across temporary accommodation, supported housing and rough sleeping pathways. Temporary accommodation use has increased and longer stays create pressure for households, the Council and the wider homelessness system. TA pressures are closely linked to reduced prevention success, limited move-on and insufficient accommodation options for people with higher needs.
4. Improve access to and effectiveness of support services	Test enhanced homelessness prevention approaches within the Housing Related Debt Policy, including early debt resolution, affordable repayment arrangements and integrated support pathways	Lived experience research highlighted how debt and UC overpayments are barriers that stop move-on, even when people are ready. Professionals emphasised the need for flexible prevention funds and practical problem-solving to stop escalation into TA/relief.
5. Prevent rough sleeping	Embed and enhance existing discharge-to-housing pathways from prison, hospital and care settings	Rough sleeping will be addressed through a separate long-term rough sleeping plan where required, but the wider homelessness system still has a key role in preventing rough sleeping. This includes earlier intervention, stronger discharge and transition pathways, improved access to accommodation and better support for people at risk of street homelessness.

Strategic priority	Prioritised review recommendation (2026 – 2028)	Rationale from the review
6. Break the cycle of chronic and repeat street homelessness and rough sleeping	Increase high-intensity and step-down supported housing, alongside stronger move-on pathways (e.g. tenancy sustainment)	The review identified a recognised gap in supported accommodation for people experiencing multiple disadvantage, alongside a lack of step-down and move-on options. Without this capacity, people with multiple and complex needs can remain stuck in unsuitable settings, cycle through crisis services, or be unable to move on from rough sleeping, temporary accommodation or supported housing.

A small number of additional actions have been identified to reflect national expectations and grant conditions, as well as additional local priorities or opportunities. See Annex A for full details.

Local governance, monitoring and reporting

Cambridge benefits from a mature network of homelessness partnerships, operational forums and joint working arrangements. These arrangements provide strong foundations for delivery and have been recognised as a key strength of the local system. The homelessness review also identified opportunities to strengthen strategic leadership, accountability and coordination:

Governance element	Role
Cambridge City Council Leadership Team & Cabinet Member for Safety, Wellbeing and Tackling Homelessness	Provide strategic leadership, approve priorities, oversee performance; and ensure homelessness remains a corporate priority
Homelessness Strategy Steering Group	Multi-agency strategic oversight group chaired by the Council's Assistant Director Housing & Health. Meets quarterly and oversees delivery of Strategy and Action Plan, monitors performance against local targets, resolves barriers to delivery and promotes shared accountability across partners. Maintains formal links with the Greater Cambridge Housing Strategy governance arrangements, Health & Wellbeing Board, Community Safety Partnership, Safeguarding Partnerships and lived experience structures to ensure alignment across related strategies and programmes
Homelessness Forum/ Charter Partnership	Wider stakeholder engagement forum bringing together statutory services, housing providers, voluntary and community organisations, experts by experience and wider civic partners. Supports collaboration, challenge and shared learning
Lived Experience and Changing Futures structures	Provide challenge, insight and coproduction around service design, implementation and review, particularly for people experiencing multiple disadvantage

Governance element	Role
Streets to Home Partnership and Long-Term Rough Sleeping Partnership arrangements	Coordinate operational and strategic responses to rough sleeping, including delivery of the long-term rough sleeping partnership plan
Sub-regional and thematic partnerships	Support delivery of specific pathways and wider housing market challenges
Council scrutiny and review	Receive performance updates, review progress against targets and provide democratic accountability for delivery of the Strategy and Action Plan

Partnership working

Preventing and reducing homelessness in Cambridge depends on effective partnership working. Whilst Cambridge City Council has a clear leadership and statutory role, no single organisation can address the causes and consequences of homelessness alone.

Cambridge already benefits from a strong network of partnerships and joint working arrangements. Partners will continue to support a shift towards earlier intervention and prevention. This will include improving identification of at-risk households, strengthening referral pathways, promoting the Duty to Refer and preparing for the Duty to Collaborate; and coordinated move-on planning and tenancy sustainment. Partnership working is particularly important for people experiencing multiple disadvantage, and this is outlined further in the accompanying long-term rough sleeping partnership plan.

The Council and partners will continue to strengthen pathways for people leaving public institutions, reflecting the national ambition that nobody should leave prison, hospital or care into homelessness. Existing protocols and partnership arrangements will be reviewed and strengthened where required, with a focus on early identification, coordinated discharge planning, information sharing, accommodation pathways and ongoing support following transition. Partnership arrangements will make best use of the city's collective resources, expertise and assets; whilst ensuring experts by experience continue to shape the design, delivery and improvement of local services.

Implementation and delivery approach

This plan uses a range of delivery/ implementation methods depending on the action:

- “Business as usual” – actions picked up during ongoing service improvement and delivery activity
- Traditional projects or task and finish groups – time-limited partnership group/ structure set up to coordinate delivery of the action and associated outcomes. May require a business case then pilot/ implementation, or could support delivery of “quick wins” in shorter timeframes
- Test and learn approach – Useful for dealing with complex, high-risk challenges where there's uncertainty and evidence gaps. Iterative cycles of testing changes in practice, reviewing what is happening and what we are learning, then deciding what to continue, adapt, stop or scale

The table in Annex A outlines which method will be used for each action.

Local targets

This section outlines Cambridge's local targets for improving outcomes over the course of this action plan. These have been developed using local baseline data, recent trends and comparison with similar areas, and reflect the level of ambition required to deliver meaningful improvement. The table of actions (Annex A) outline how we will work with partners to achieve these targets. The targets emphasise directional change. This ensures transparency about the scale of change expected, whilst recognising performance is influenced by wider factors beyond the control of any single organisation. Progress against these targets will be reviewed regularly as outlined in the governance section.

Cambridge will maintain a strong focus on preventing the use of Bed & Breakfast accommodation for families and will monitor usage, duration and system pressures through regular reporting. If Cambridge reaches the national threshold requiring a formal B&B Elimination Plan, or if reliance on B&B accommodation begins to increase significantly, the Council and partners will work with MHCLG advisers to develop a targeted improvement plan in line with national guidance.

Metric	Baseline [Date]	Year 1 target [Date]	Year 2 target [Date]	Direction
Rate of households in temporary accommodation with children per 1,000 households	0.18 per 1,000 [Sept 2025]	0.17 per 1,000 [Sept 2026]	0.15 per 1,000 [Sept 2027]	↓ 17% reduction
Number of people sleeping rough on a single night	26 [Autumn 2025]	22 [Autumn 2026]	17 [Autumn 2027]	↓ 35% reduction
% duties where homelessness was prevented or relieved	42.9% [Jul to Sept 2025]	46% [Jul to Sept 2026]	50% [Jul to Sept 2027]	↑ 7.1 percentage point increase
% duties where homelessness was prevented or relieved for households experiencing multiple disadvantage	22.2% [Jul to Sept 2025]	30% [Jul to Sept 2026]	38% [Jul to Sept 2027]	↑ 15.8 percentage point increase
Number of people sleeping rough over the month who are long-term*	24 [Nov 2025]	20 [Nov 2026]	16 [Nov 2027]	↓ 33% reduction
Number of families in B&B over 6 weeks	0 [Sept 2025]	0 [Sept 2026]	0 [Sept 2027]	Eliminate / maintain zero

*More detailed activity to support this metric is included within the accompanying long-term rough sleeping partnership plan

Priority area	Action	Milestone	Owner(s)	Delivery Mechanism	Relevant Metric(s)
Pilot use of predictive analytics to identify and support early at-risk households, focused on PRS sustainment and financial shocks	Develop and validate a PRS risk identification model using LIFT and local data	Risk cohort established by Dec 2026	Cambridge City Council & South Cambridgeshire Council	Traditional	% duties where homelessness was prevented or relieved
	Pilot proactive prevention support for high-risk households and evaluate impact	First pilot completed by Jun 2027		Test and learn	
	Agree future operating model	Scale-up decision and business case completed by Mar 2028	Charter Data Pillar Task & Finish Group		
Test a refreshed PRS access model with revised incentives, risk-sharing and clearer landlord offer	Complete review of the Access Scheme and Townhall Lettings offer, including landlord feedback and benchmarking against comparable authorities	Revised offer agreed by March 2027	Cambridge City Council Charter Housing Pillar Task & Finish Group	Traditional	% duties where homelessness was prevented or relieved
	Pilot a refreshed landlord package including consideration of revised financial incentives, tenancy sustainment support, landlord retention measures, property improvement support and differentiated service offers	Pilot launched by June 2027 with agreed landlord recruitment and retention measures			
	Evaluate impact on PRS supply, tenancy sustainment and homelessness prevention outcomes and agree future model	Evaluation completed and future model agreed by March 2028			
	Deliver an updated and targeted landlord engagement and marketing campaign focused on priority property types and under-represented landlords	Landlord engagement campaign refreshed and implemented by October 2026	Cambridge City Council	Business as usual	
Test enhanced homelessness prevention approaches within the Housing Related Debt Policy, including early debt resolution, affordable repayment arrangements and integrated support pathways	Review and refresh the Housing Related Debt Policy to strengthen homelessness prevention, tenancy sustainment and early intervention approaches	Revised policy agreed by October 2026	Charter Housing Pillar Task & Finish Group	Business as usual	% duties where homelessness was prevented or relieved
	Pilot enhanced debt-resolution pathways for households at risk of homelessness, including affordable repayment arrangements, debt advice, income maximisation support and prevention-focused use of Housing Related Debt Panel discretion	Pilot launched by March 2027		Test and learn	
	Evaluate outcomes and embed successful approaches into business-as-usual practice, including joint working arrangements across Housing Advice, Financial Inclusion, Revenues and debt advice partners	Future operating model agreed by March 2028			

Priority area	Action	Milestone	Owner(s)	Delivery Mechanism	Relevant Metric(s)
Embed and enhance existing discharge-to-housing pathways from prison, hospital and care settings	Implement improvements arising from the sub-regional prison release protocol review and embed the new prison housing advisor function	Revised prison pathway operational by March 2027	Sub-regional multi-agency group	Business as usual	% duties where homelessness was prevented or relieved
	Strengthen implementation of existing hospital discharge arrangements, including promotion of referral pathways, ward engagement and exploration of co-location opportunities at Addenbrooke's	Enhanced hospital discharge pathway operational by March 2027	Transfer of Care Hub Meeting		People sleeping rough on a single night
	Review performance and outcomes across prison release, hospital discharge and care leaver pathways, and identify any further improvements required	Annual pathway review completed by March 2028	Multi-Agency Steering Group		People sleeping rough who are long-term
Increase high-intensity and step-down supported housing, alongside stronger move-on pathways (e.g. tenancy sustainment)	Strategic planning for Supported Housing (Regulatory Oversight) Act including supported housing needs assessment, strategy and delivery plan	Local strategy published by March 2027 Implement first year of the delivery plan by March 2028	Cambridgeshire & Peterborough Authorities	Traditional	People sleeping rough who are long-term % duties where homelessness was prevented or relieved for those experiencing multiple disadvantage Households with children in temporary accommodation
	Develop and mobilise 8-bed high intensity support scheme at The Victoria Project (TVP)	Scheme live by March 2027	Riverside/ Cambridge City Council		
	Review and expand Housing First provision in partnership with Cambridgeshire County Council, including exploration of Cambridgeshire & Peterborough Combined Authority (CPCA) funding opportunities	Review completed and growth plan agreed by December 2026 Implementation by March 2028	Cambridgeshire County Council/ CPCA		
	Develop and evaluate a social investment proposition for Greater Cambridge Impact Fund, including a Housing Pathways Fund model, to support delivery of high-needs housing, Housing First and move-on accommodation	Complete feasibility assessment and options appraisal for social investment by Dec 2026 Develop full investment proposition and secure partner commitment by Sept 2027 Investment-ready programme established by March 2028	Charter Housing Pillar Task & Finish Group		

Priority area	Action	Milestone	Owner(s)	Delivery Mechanism	Relevant Metric(s)
System improvement actions	Develop and publish new policy for ensuring the suitability of temporary accommodation following an assessment, including procuring sufficient units of temporary accommodation and allocating them	Publish Dec 2026	Cambridge City Council	Business as usual	Households with children in temporary accommodation Families in B&B over 6 weeks
	Pilot and implement AI-enabled case recording and workflow tools to increase frontline capacity, improve record quality and support more consistent service delivery	Complete pilot by March 2027 and agree business case for wider implementation Implement AI-enabled case recording across homelessness services and relevant housing functions by March 2028	Cambridge City Council		NA
	Implement a new homelessness governance and accountability framework aligned to the Duty to Collaborate, Local Outcomes Framework and MHCLG's local performance and accountability toolkit	Establish new multi-agency Homelessness Strategy Steering Group by Dec 2026	Multi-Agency Steering Group		
	Develop an outline outcomes and investment framework for homelessness and rough sleeping services, covering commissioned services, grant-funded provision and partnership-funded activity, to inform future investment decisions and support transition through Local Government Reorganisation	Mapping of current investment, activity and outcomes completed by December 2026. Framework agreed and applied to 2027/28 funding Recommendations provided for successor arrangements by September 2027	Cambridge City Council	Traditional	NA

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Cambridge City Homelessness Review

February 2026

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0. Executive Summary

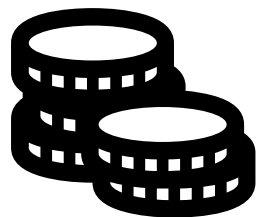
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Review context

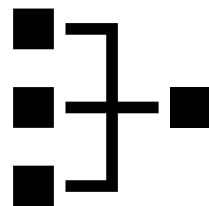
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A **new national homelessness plan to end homelessness** with funding allocations for 2026/27 onwards published **in December 2025**



Fair Funding Review 2.0 reforming Local Gov Finance Settlement from 2026/27. All homelessness & rough sleeping funding, except TA, rolled into single grant. Other consolidations (e.g. public health, crisis and resilience)



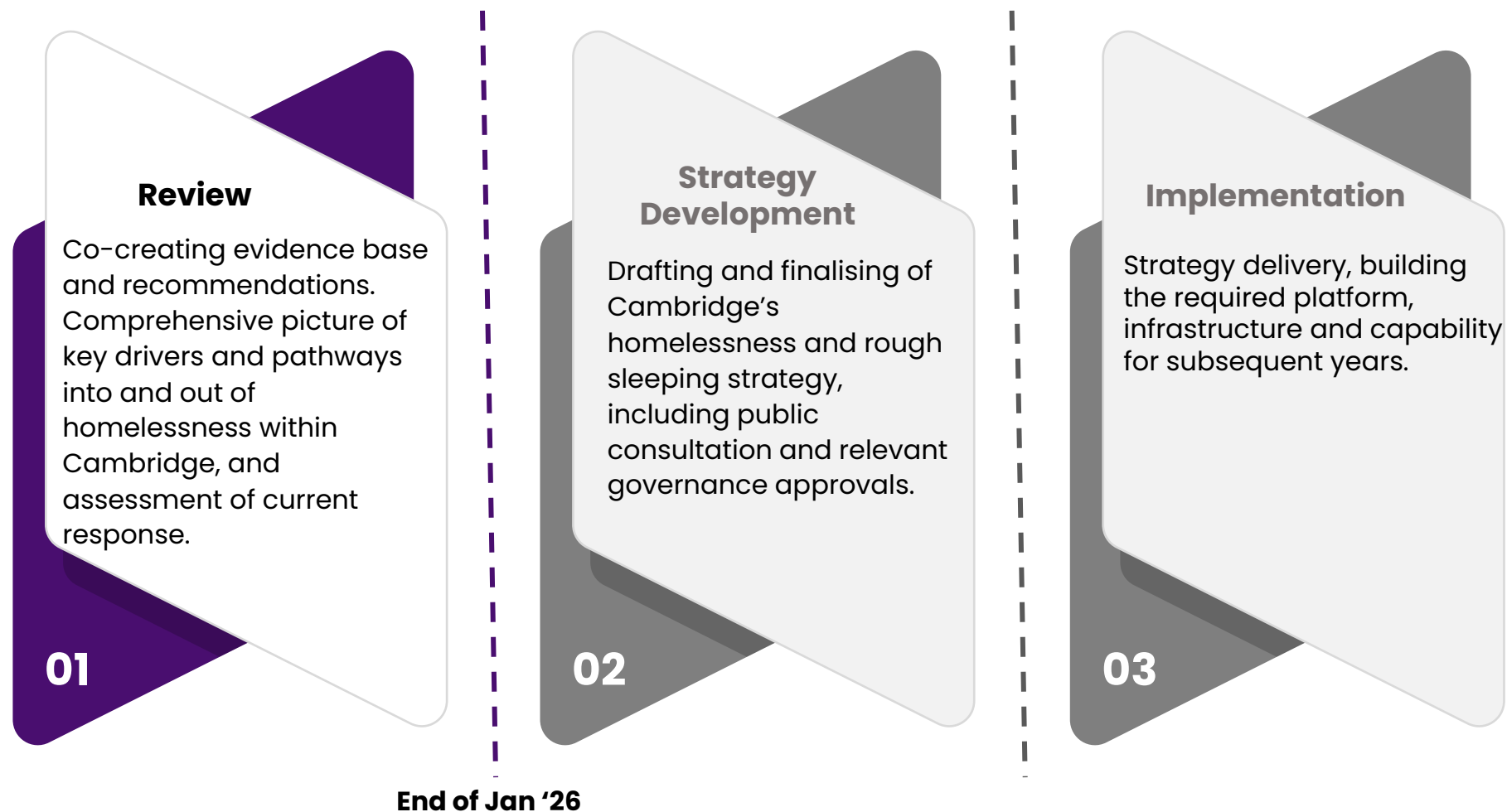
New strategic powers for CPCA and transition to established mayoral strategic authority. **LGR proposals submitted** Nov 2025



Upcoming legislative and policy changes, including **the Renters' Rights Act, the Supported Housing Regulatory Oversight Act**, and initiatives related to neighbourhood health and pride of place

Where we are

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Review lines of enquiry

Core review statutory lines of enquiry

Existing strategy & landscape

- Evaluate current strategy, effectiveness and outcomes achieved
- Homelessness charter and pillars of change
- Value of Cambridge & South Cambs shared pathway
- Effectiveness of partnership working arrangements

Current & future levels of homelessness

- Trends, causes and factors
- Population segmentation (key demographics)
- Future projections
- Pathways into/ out of homelessness

Accommodation & service provision

Effectiveness of current prevention & relief efforts	Review Home-Link and lettings policy
Effectiveness of accommodation/ support services	Review provision of legal support
Gaps/ unmet need in current and future provision	Availability and affordability of housing across all tenures
Current use, supply and demand for Temporary Accommodation	Alignment between social housing availability and need
Opportunities for more joint working, funding & place-based approaches	Role and effectiveness of the private rented sector
Effectiveness of current provision for rough sleepers	Effectiveness for those without local connection

Resources

- Resource mapping and analysis
- Funding mechanisms, flows and approaches
- Alternative commissioning and funding structures
- Growth agenda in Cambridge

Additional lines of enquiry/ deep dives

- Prevention and relief benchmarking
- Upstream prevention & early help hub
- Data-led Temporary Accommodation benchmarking
- Data and systems strategy (emerging technology)
- Performance framework
- Housing officer caseloads

Current pathways

Pathway 1

Young People & Care Leavers

Individuals aged 16–24, including those transitioning out of care

Pathway 2

Victims (& perpetrators) of domestic abuse

People made homeless or at risk due to domestic abuse – may overlap with priority singles or families

Pathway 3

Families

Households with dependent children

“Priority” singles

Single adults who meet priority need thresholds due to vulnerability, health needs, or other priority criteria e.g. domestic abuse

Pathway 4

“Non-priority” singles

Single adults who do not meet the legal threshold for priority support but are still at risk of or experiencing homelessness (range of support needs)

Rough sleepers

Individuals who are sleeping outdoors or in places not meant for habitation, such as streets or abandoned buildings

Pathway 5

No recourse to public funds

Individuals with NRPF due to their immigration status (e.g. asylum seekers, those on temporary visas, undocumented migrants)

↑ Map relevant services in pathway 4 initially

People experiencing severe and multiple disadvantage

People facing overlapping challenges such as homelessness, substance misuse, mental health issues, and contact with the criminal justice system. Can cover all the cohorts outlined above.

Support Services – Commissioned/ Receiving Grant Funding

- CGL – Street Outreach
- P3 – Floating Support and Tenancy Sustainment
- Cyrenians – Older Homeless Floating Support
- Wintercomfort – Daycentre- welfare/food/laundry/showers, Crisis Intervention & Support Worker, (Streets to Home), Reconnection Worker (CHI Test & Learn)
- Cambridge Women's Resource Centre
- Cambridge Women's Aid – Domestic Abuse Helpline and Refuge
- It Takes a City – Survive and Thrive, The Haven
- Centre 33 – Young People's Homelessness and Housing Support Service, Schools Programme
- Cambridgeshire Community Foundation – Cambridge Street Aid
- Citizen's Advice – HB+/HB+ Family
- Hope into Action – Empowerment worker
- CHS – Employment support worker
- Campos Home Improvement Agency

Additional Accommodation

- Housing First (HF1/HF2) (Cambridgeshire CC)
- Temporary accommodation (160 own stock units)
- CAS 1/2/3 accommodation (East of England)
- Asylum accommodation (1 unit)
- ASC commissioned supported housing
- Non-commissioned providers of supported housing
- Private landlords
- Hundred Houses Society – Young Parent Project

Social Housing Providers

- City Homes
- 32 registered providers

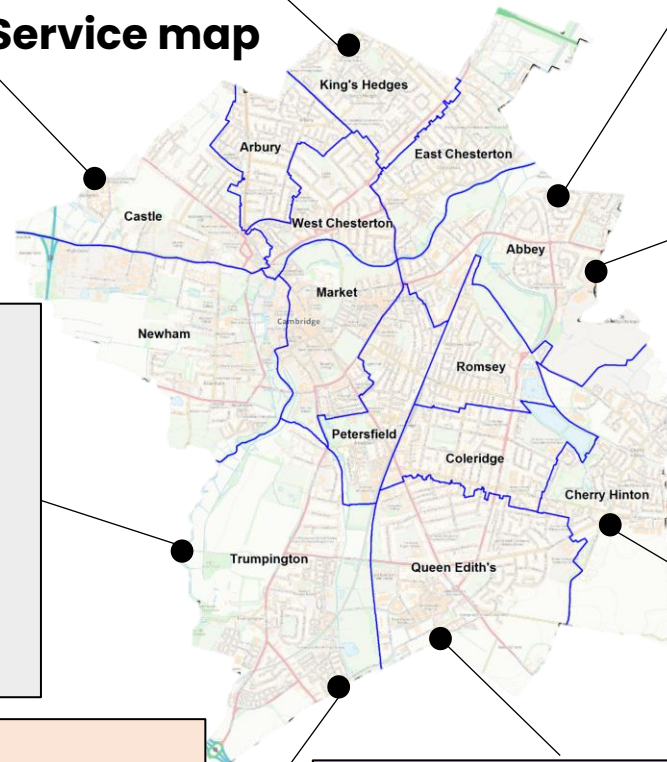
County Services

- Counting Every Adult
- Household Support Fund
- Streets to Home
- Young People's Supported Housing framework
- DA services – IDVAs, target hardening, DA outreach (Impact)
- CGL – HEaRT Homeless Drug and Alcohol Team / Drug and Alcohol Team
- Traveller Liaison service
- Safeguarding
- Cambridgeshire Local Assistance Scheme (CHS)

Statutory Partners

- DWP – Job Centre
- Cambridgeshire County Council – Adult & Children's Social Care, Public Health & Domestic Abuse
- C&P ICB – Cambridge Access Surgery
- CPFT – Dual Diagnosis Street Project
- HMPPS – East of England (commission St Giles Trust, BeNCH CRC)
- Cambridgeshire Police
- South Cambridgeshire District Council (& other districts)
- Cambridgeshire and Peterborough Combined Authority

Service map



Support Services – Non-commissioned

- The Edge – Food Hub/Drop-in
- Cambridge City Foodbank
- ITaC – Street Storage Space
- Cambridge Solidarity Fund – personalised grants
- Vicars Relief Fund – ID, accommodation, deposit and removals grants
- The Elms' – Rape and Sexual Assault Aftercare
- Experience Cambridge
- Cambridge Sustainable Food
- Street Pastors
- Cambridge Churches Homelessness Project
- CHS Charities Network

Supported Housing (Commissioned)

- Cambridge Cyrenians – short & long stay, move-on, Jubilee
- Riverside – The Victoria Project, Springs and Youth Foyer Hostels
- Jimmy's – East Road, 451 multiple needs, modular homes, shared houses
- YMCA – Queen Anne Hostel (16-25)
- CHS – Young Parent Project, Young Futures Outreach, Corona House, Russell Street
- ITaC – Community Land Trust modular housing & Crossways Winter Accommodation
- Orwell's – Whitworth House
- Waythrough – Castle Service

nb. some of these services have beds/support available beyond what's directly commissioned and fundraise to support this

Co-production/advocacy

- Changing Futures Cambridgeshire and Peterborough
- Cambridge Ethnic Community Forum – User Led Migrant and Race Equality Group
- ITaC – Women's Homelessness Action group
- Law Stop Legal Aid Solicitors

Cross-Partner Protocols

- Hospital discharge protocol
- Young people and care leavers protocol
- Intentional homeless protocol
- Eligible households protocol
- Prison release protocol

Council Housing Advice Services

- Statutory part 7 functions
- Income maximisation
- Financial and debt advice
- Rent Arrears Reduction Scheme (RARS)
- Tenancy sustainment
- Landlord mediation
- Family and friends home visiting
- Single Homeless Service
- Townhall Lettings / PRS access
- Housing Benefit Plus
- Homelink/social lettings
- Specialist DA housing worker
- Discretionary prevention spending
- RSAP Programme
- TAP & Prevention Panel

Strong foundations in the face of systemic challenges

Key messages from the review

- Cambridge has **strong foundations** in place to respond to homelessness. Partnership working is well established, the voluntary and community sector is a major strength, and there is effective joint delivery in areas such as rough sleeping outreach, domestic abuse and multi-agency support. People with lived experience consistently value trusted relationships and specialist services.
- These strengths are under increasing pressure. Demand for homelessness services is rising, temporary accommodation use has grown, move-on options are limited and the private rented sector is becoming harder to access. People are also presenting with more complex needs, including mental ill-health, trauma and multiple disadvantage.
- The review found that the system is often **good at responding to crisis**, but less consistent at preventing homelessness earlier or stopping it from reoccurring.
- Key pressure points include discharge from institutions into homelessness, gaps in high-needs supported housing, uneven access to health services and limited options for some groups, including women, people with no recourse to public funds and those experiencing hidden homelessness.
- The recommendations build on Cambridge's strong foundations while addressing these challenges. They focus on **strengthening prevention**, improving flow through the system and targeting resources where they will have the greatest impact. The strategy should be guided by a clear principle: **start less and finish more**, with a small number of priorities for the next two years and limited, targeted test-and-learn activity. The aim is a system that intervenes earlier, prevents repeat homelessness and delivers support with dignity and safety.

Key findings from the data

- **Demand has increased dramatically.** Requests for assessment have grown **140%**, and total approaches have almost tripled since 2020.
- **Domestic abuse, PRS insecurity, custody and LAC transitions drive growth.** Domestic abuse assessments have risen **171%** since 2021.
- **Singles dominate statutory workload.** Rough sleepers and single households account for around two-thirds of relief duties and TA entries, reflecting Cambridge's age profile, labour market and unaffordable housing.
- **Outcomes differ sharply by pathway.**
 - Families: ~43% relief; 53% relief unsuccessful leading to a main duty decision.
 - Rough sleepers: 95% relief; 35% successful relief; with a high rate of no-duty outcomes after 56 days.
 - Non-priority singles: only 41% successful prevention; high transition into relief.
- **TA demand has grown by 57% in four years.** Meaning that the budget has come under sustained and substantial pressure.
- **Acuity is rising.** "Low needs" cases declined from 41% to 23% of the total, meaning complex needs now comprise the majority of demand. Our projections show that future demand will rise in all likely scenarios and highlight the importance of embedding prevention and early intervention.
- **Social lettings are declining.** Reduced move-on capacity is driving blockages throughout the system—contributing directly to longer stays in TA and supported accommodation.

Key findings from system engagement



Cambridge has a strong, well-developed homelessness ecosystem. Stakeholders consistently praised the breadth of provision across statutory, commissioned, voluntary and community sectors.



Workforce churn undermines continuity and specialism. High cost of living and low sector pay results in turnover that destabilises care relationships and slows progress on complex cases.



CAS and the DDSP are vital but under substantial demand. NHS partners report reliance on the Access Surgery as a default for homelessness, which doesn't align with PCN funding formulas based on list size.



Services for rough sleepers are responsive and well-coordinated. The Streets to Home partnership structure is working well and the TAP approach has broad buy in.



There's a recognised gap in supported accommodation for individuals with complex needs. Expanding housing-led models of supported accommodation/housing first to address this should be a priority.



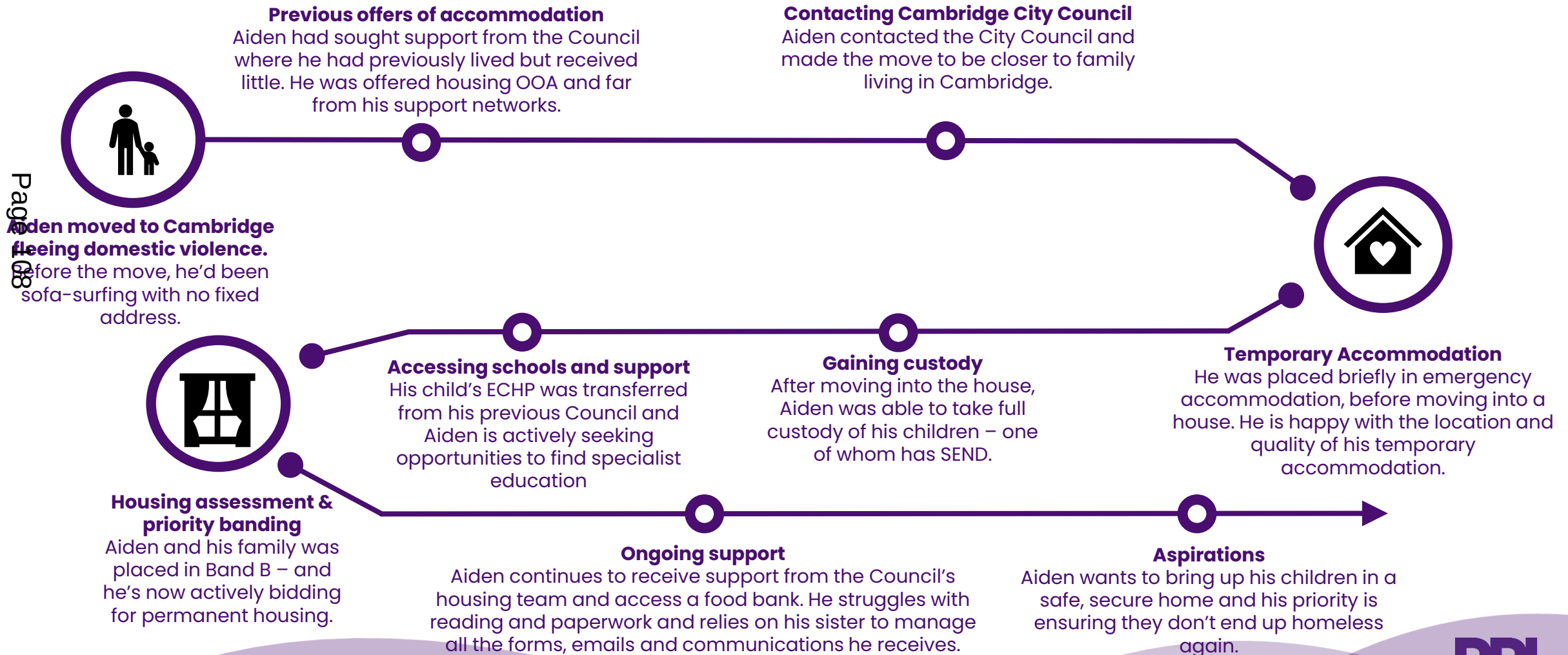
Cambridge has a number of innovative practices in place which respond to the City's local needs and assets. Examples include housing first, modular homes, a test-and-learn partnership with the CHI and the TAP approach.



The next step for Cambridge is to build on foundations of strong partnership working to include the wider system of services available. This includes strengthening relationships with adult social care, health and justice colleagues.

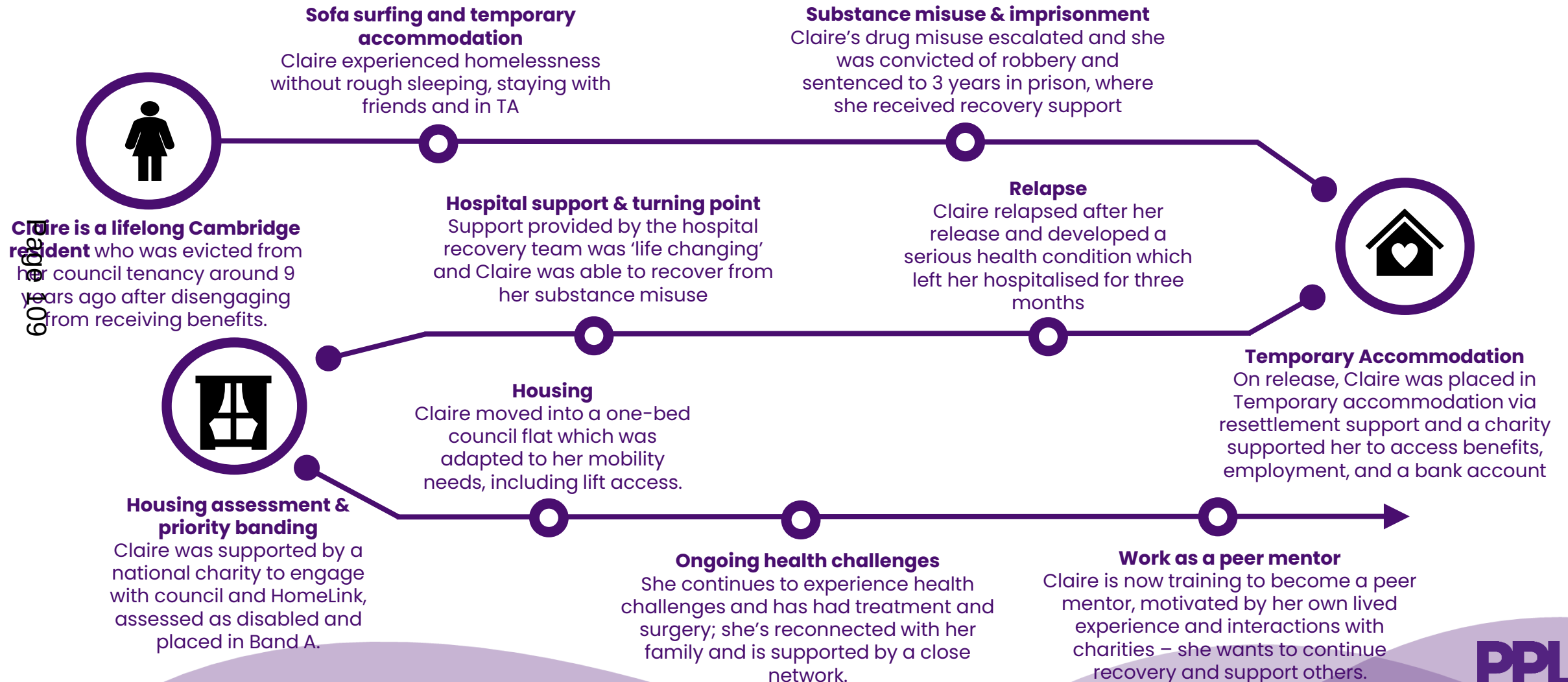
Case study from lived experience research: Aiden

Aiden is a parent living with his children in temporary accommodation in Cambridge. His timeline outlines the value of timely housing support for creating stability for his family.



Case study from lived experience research : Claire

Claire is a women with lived experience of homelessness, addiction and recovery. The below charts her journey through the homelessness system in Cambridge, which shows the importance of critical transition point interventions.



Recommendations: framing and context

Building on what works well

- Cambridge is not starting from scratch. The review found **strong foundations** across the homelessness system
- The recommendations are therefore **not about replacing what works**, but **strengthening, aligning and extending it**.

Preparing for LGR

- Local Government Reorganisation from 2028 provides important context for this review and recommendations
- These recommendations are deliberately focused on what can be achieved within the next two years
- The recommendations prioritise **system resilience**: clearer governance, stronger partnerships, shared data and evidence, and approaches that can transfer into future arrangements

Prevention

- Developing a consistent and impactful approach to preventing homelessness, particularly recurrence of homeless and entrenched rough sleeping are central priorities.
- The rising use of temporary accommodation, increasing complexity of need and pressure on move-on options all highlight the fact that without a stronger focus on prevention, demand will continue to outpace capacity.
- Developing prevention and early intervention is therefore the **central organising principle** of the recommendations.

Recommendations: summary

Area	Council-led
Targeted early prevention for PRS households at risk	✓
Strengthening communication standards	✓
Improving consistency and follow-up of the Duty to Refer. Refreshing homelessness governance to support the Duty to Collaborate	✓
Sharpening existing prevention panels to intervene earlier	✓
Improving internal processes and templates to support faster move-on	✓
Improving navigation and signposting for people approaching services	✓
Streamlining multi-agency forums and meetings	✓
Rebalancing the system towards earlier, proactive prevention	✓
Developing a whole-system demand and capacity model	✓
Embedding co-production as standard practice in commissioning and service design	✓
Launching a strategic forum with Registered Providers on social housing access and move-on	✓

Area	System
Primary care inclusion model linked to homelessness pathways	✓
Enhanced MDT / lead-worker model for people experiencing multiple disadvantage	✓
Debt-resolution pathways linked to housing outcomes	✓
Targeted pathways and improved data capture for under-served / hidden groups	✓
Increasing high-needs and step-down supported housing with stronger move-on and sustainment	✓
Strengthening discharge-to-housing pathways from prison, hospital and care	✓
Maintaining a clear local ambition and metric to reduce long-term and repeat rough sleeping	✓
Commissioning additional immigration and legal advice services	✓

Recommendations: prioritisation and impact

Prioritised quick-wins, test and learn opportunities and strategic change opportunities



"Quick Wins"

Low effort, high-impact initiatives which deliver fast and tangible results. Typically achievable within a short-timeframe e.g. 1-3 months



Test and Learn

Dealing with complex, high-risk challenges where there's uncertainty and evidence gaps. Includes small 'test' cases/proof of concepts.



Traditional

For larger, more sustained change which requires a business case and broad system buy-in. Moving from (potential) pilot to full roll-out/implementation.

HIGHER

Importance, impact and/or urgency

- Strengthen communication standards (clear explanations, decision letters, two-way feedback)
- Improve consistency and follow-up of Duty to Refer
- Sharpen existing prevention panels to intervene earlier

- Targeted early prevention for PRS households at risk (financial shock, arrears and eviction).
- Primary care inclusion model linked to homelessness pathways

- Increase high-needs and step-down supported housing with stronger move-on and tenancy sustainment
- Strengthen discharge-to-housing pathways from prison, hospital and care
- Maintain a clear local ambition and metric to reduce long-term and repeat rough sleeping

MEDIUM

Importance, impact and/or urgency

- Improve internal processes and templates to support faster move-on from TA and supported housing
- Improve navigation and signposting for people approaching services

- Enhanced MDT and lead-worker model for people experiencing multiple disadvantage
- Debt-resolution pathways linked to housing outcomes

- Develop a whole-system demand and capacity model

LOWER

Importance, impact and/or urgency

- Streamline multi-agency forums and meetings to reduce duplication

- Targeted pathways and improved data capture for under-served and hidden groups

- Refresh homelessness governance to support the Duty to Collaborate
- Launch a strategic forum with Registered Providers on social housing access and move-on
- Commission additional immigration and legal advice services

1. Existing Strategy & Landscape

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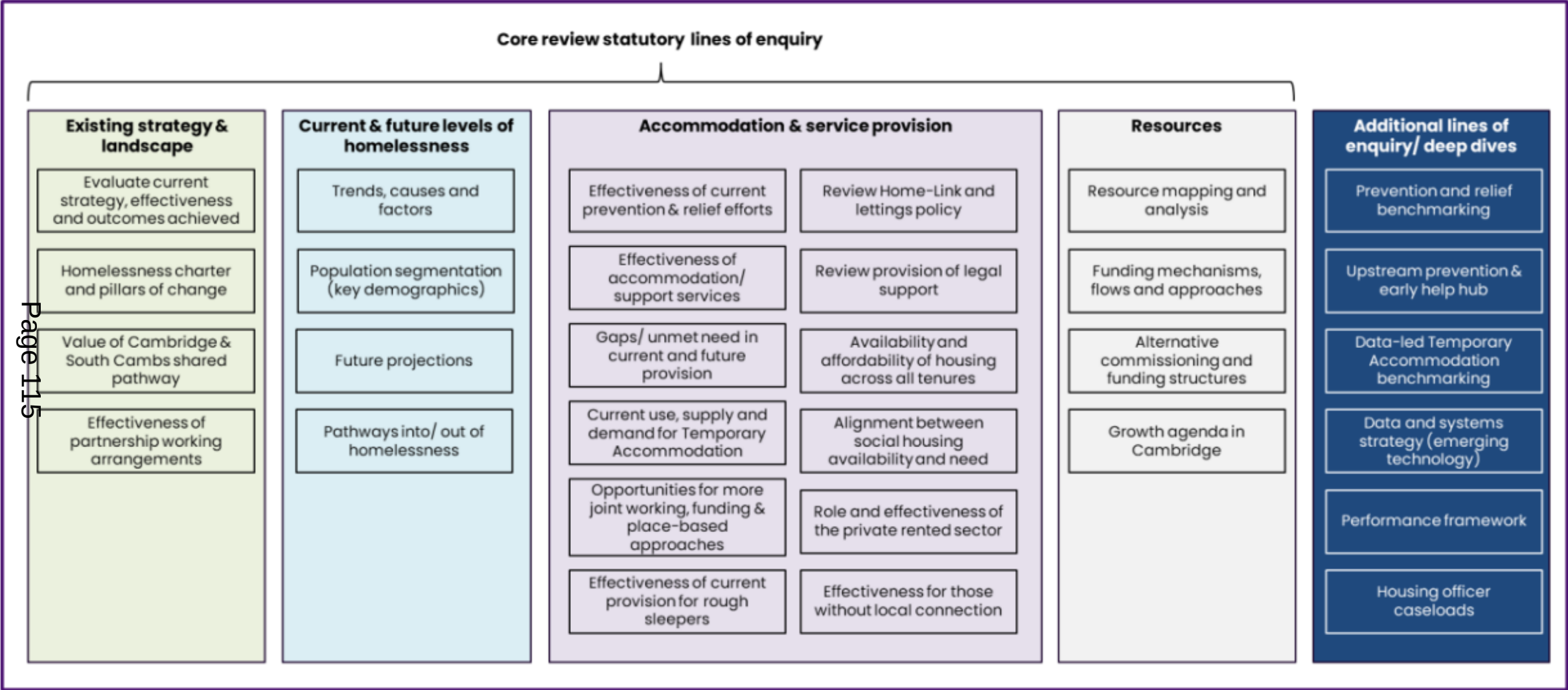
Review context

Cambridge is a small city in south-east Cambridgeshire with a population of just over 150,000 (Census 2021). Between 2011 and 2021, it was among the fastest-growing cities in the UK, driven in part by the expansion of the knowledge and biomedical economy associated with the University of Cambridge and the wider 'Silicon Fen' area. While this has led to significant socio-economic growth, Cambridge has seen growing challenges in housing availability and affordability as a result. **This homelessness review was completed between September – February 2026, a time of significant change nationally for homelessness-related policy.** This review and development of the subsequent strategy should account for this where possible:

- **Local Government Reorganisation (LGR):** In December 2024, the government set out plans to move towards a new system of local government, abolishing all 'two-tier' areas in England by April 2028. Cambridge City, East Cambridgeshire District and South Cambridgeshire District Councils have backed the creation of a new Unitary council for Greater Cambridge and another for North Cambridgeshire and Peterborough, known locally as option 'B'. Decisions on which LGR model will be followed are expected in the summer of 2026, following a period of resident consultation.
- **Supported Housing (Regulatory Oversight) Act 2023:** There are national concerns surrounding the growth and under-regulation of the specified exempt sector. In August 2023, the Supported Housing (Regulatory Oversight) Act became law, enhancing the regulation of the sector through several mechanisms, including the introduction of National Supported Housing Standards for England and giving local authorities the power to create local licensing schemes for exempt accommodation. The regulations/ provisions within the Act are expected to be implemented over the next 2 years.
- **Renters' Rights Act:** The Renters' Rights Act received Royal Assent in October 2025. The bill aims to provide greater security and fairness for renters, while also increasing transparency and accountability for landlords. Key provisions in Phase 1 (May) include: abolishing Section 21 evictions, banning rental bidding wars, and limiting rent increases to one per year. A PRS database and landlord ombudsmen will be launched later in 2026.
- **The National Plan to End Homelessness:** Published in December 2025, the Government's new national strategy commits £3.5 billion of investment in homelessness prevention and rough sleeping services over the next three years. The Plan introduces national targets to halve long-term rough sleeping by 2029, end the unlawful use of bed and breakfast accommodation as long-term housing for families, and reduce homelessness arising from discharge from public institutions. The strategy places new expectations on local authorities to meaningfully engage people with lived experience in the design of services and introduces a new statutory Duty to Collaborate across public bodies. It also allocates an additional £124 million to expand supported housing provision.

Review lines of enquiry

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Strategic Landscape | Current strategy

The previous Homelessness and Rough Sleeping Strategy (2021–2026), informed by a review conducted in 2019, highlighted several key priorities for the council in addressing homelessness in the City (below).

- These priorities, and the City’s homelessness system more broadly, sit against the backdrop of a challenging housing environment in the city, characterised by high demand for social housing which outstrips supply, as well as a mismatch between applicants and stock; a shortage of PRS properties and high rents in the city (across all tenures); and income and wealth inequality.
- Cambridge has significant housing affordability issues, with only London having less affordable house prices relative to local pay rates. However, the State of the City update report in 2024 shows that from 2022 to 2023 average house prices fell and the affordability of private rents improved as incomes increased. The delivery of new homes in Cambridge has continued to outpace benchmarks with one of the highest housebuilding rates in the country.
- **Other local policies which inform the housing and homelessness landscape are:**
 - **Homes for our Future: Greater Cambridge Housing Strategy (2024–2029)** – These local housing issues, and plans to tackle them, are set out in the Greater Cambridge Housing Strategy. The document sets out the strategic direction for housing activity in Cambridge City and South Cambridgeshire District.
 - **Cambridge and Peterborough Health and Wellbeing Strategy (2022)** – Sets out shared ambitions of NHS, local authorities and health and care organisations, namely: ensuring children are ready to enter and exit education; creating a healthy environment; reducing poverty through boosting employment, skills and housing; and promoting prevention to support mental health and wellbeing.

2021–2026 Priorities	
1.	Support those at risk of homelessness to remain in their homes where possible:
2.	Improve access to and range of permanent accommodation
3.	Minimise use of temporary accommodation
4.	Improve access to and effectiveness of support services
5.	Prevent rough sleeping
6.	Break the cycle of chronic and repeat street homelessness and rough sleeping

Strategic Landscape | Key forums & protocols (1/2)

Key Fora

- **Housing Board for Cambridgeshire, Peterborough & West Suffolk:** Meets monthly, a multi agency group made up of senior officers from regional local authorities, housing providers and partner agencies. As a high-level strategic forum, the Board works to highlight the importance of housing and its pivotal role when issues require an integrated response across a range of organisations, areas and agendas.
- **Sub-Regional Homelessness Strategy Group:** Made up of Housing Options and Homeless leads from City and District Councils across Cambridgeshire, Peterborough and West Suffolk, the objectives of the group are to improve joint working practices, learning from best practice, and identify and respond to key regional emerging issues and trends.
- **Streetlife Working Group:** Local forum led by Cambridge City Council to bring together key partners supporting rough sleepers in the City, with the aim of 'reducing the personal self-harm *and* public distress caused by rough sleeping'. Core group consists of senior and middle level staff from key Council teams (Safer Communities, Housing Advice, Public Realm Enforcement), the police, CGL, Counting Every Adult, Jimmy's, Cyrenians, Wintercomfort, Riverside and Cambridge Business against Crime. Meets bi-weekly.

Joint Working Protocols

- **Joint Housing Protocol for the Assessment of 16/17 year olds:** outlines how Cambridgeshire County Council and the five District Councils work together to support young people who present as homeless. Involves CCC Services – MASH, Assessment, Adolescent – and the District Councils – South Cambridgeshire, Cambridge City, East Cambridgeshire, Huntingdonshire, Fenland.
- **Joint Housing Protocol for Young People Leaving Care:** outlines how Cambridgeshire County Council, the five districts, Corporate Parenting Service, alongside key partner agencies will work together to support care leavers to successfully transition into independent living. Applies to care leavers aged 16/17, young people remanded into local authority care, and young people seeking asylum. Includes assurance that all care leavers are allocated band A on HomeLink.
- **Accommodation Protocol Pathways for People with Experience of the Criminal Justice System:** promotes a multi-agency approach to working together to provide effective support to people in prison and prison leavers. Brings together HM Prison and Probation Service (HMPPS), Local Housing Authorities, Commissioned Rehabilitative Services, Community Accommodation Services (CAS) – CAS1, CAS2 and CAS3, Department for Work and Pensions (DWP) – Job Centre Plus (JCP) and Adult Social Care.

Strategic governance | Key forums & protocols (2/2)

Joint Working Protocols (cont.)

- **Protocol for the assessment of the housing and support needs of families with children or young people who are homeless or at risk of homelessness (including ineligible and intentionally homeless):** Commits Cambridgeshire County Council, People and Communities (Children and Adult Services) Cambridge City Council East Cambridgeshire District Council Fenland District Council Huntingdonshire District Council South Cambridgeshire District Council to work in a coordinated way to ensure a prompt and efficient service to such families. Including appropriate assessments of housing and support needs, clarity and certainty to these families on the services that they can access, how they can access them and within what timescale and a joined up approach to the provision of suitable accommodation, particularly the aim to avoid the use of B&B.
- **Cambridgeshire and Peterborough TOCH Housing Escalation Process (Hospital Discharge):** for patients at risk of, or experiencing homelessness, with an unmet need and therefore requiring involvement of the Transfer of Care Hub to manage their complex discharge. Looks to mitigate any blocker to discharge as a result of homelessness by ensuring appropriate care in community settings (including specialist intermediate care where available).

Strategic Landscape | Wider developments

In Autumn 2025, It Takes a City launched the Cambridge Charter to End Homelessness, which sets out a strategic set of priorities to make rough sleeping and homelessness rare, brief and non-recurring.

- The Charter is organised around six pillars of change (right), each of which the Charter collaboration group believes is essential to ending homelessness:
- Organisations involved in devising the Charter, include a range of statutory, provider and charity partners, such as: Cambridge City Council, Cambridgeshire County Council, Cambridgeshire and Peterborough Combined Authority, It Takes a City, Centre 33, Cambridge Cyrenians, Cambridge 2030, Downing College Cambridge, Anglia Ruskin University, Cambridgeshire and Peterborough ICS, the Co-Production Group Cambridge, University of Cambridge, YMCA Trinity, Bidwells, Experience Cambridge, Changing Futures, Riverside, and Cambridge Ahead.
- The Charter is currently in early days and there remains an opportunity to consider how best to work alongside the Charter collaboration group to ensure alignment between the Council's strategy and Charter signatories.



Data – defining the goal, and measuring progress towards it



Information – keeping everyone informed on actions, progress and how to help



Housing – ensuring sufficient emergency, temporary, supported and permanent housing



Support – building trust and collaboration in wrap-around support “for the journey”



Health – ensuring sufficient health services and eliminating barriers to access the services



Employment – providing opportunity and training and encouraging employers.

2. Current and future levels of homelessness

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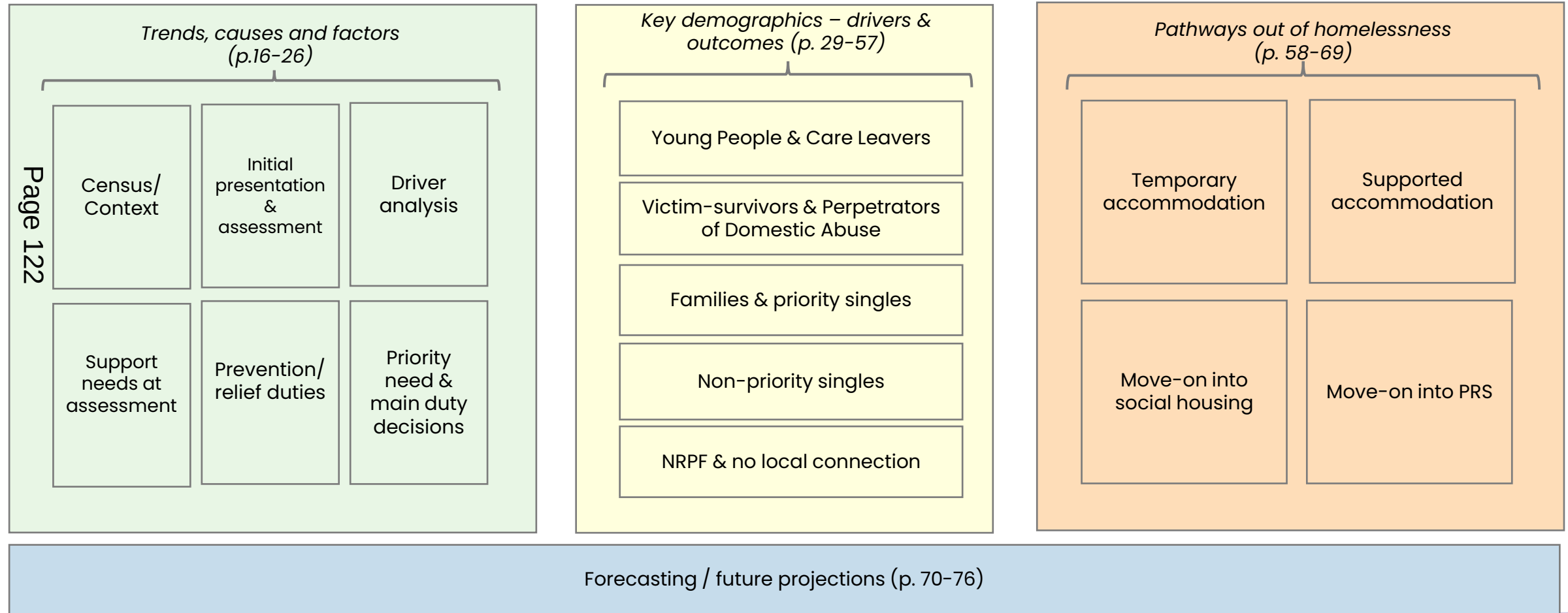
Key messages

Overview of findings from our quantitative work

- **Demand has increased dramatically.** Requests for assessment have grown **140%**, and total approaches have almost tripled since 2020.
- **Domestic abuse, PRS insecurity, custody and LAC transitions drive growth.** Domestic abuse assessments have risen **171%** since 2021.
- **Singles dominate statutory workload.** Rough sleepers and single households account for around two-thirds of relief duties and TA entries, reflecting Cambridge's age profile, labour market and unaffordable housing.
- **Outcomes differ sharply by pathway.**
 - Families: ~43% relief; 53% relief unsuccessful leading to a main duty decision.
 - Rough sleepers: 95% relief; 35% successful relief; with a high rate of no-duty outcomes after 56 days.
 - Non-priority singles: only 41% successful prevention; high transition into relief.
- **TA demand has grown by 57% in four years.** Costs have overshot budget by nearly **£380k** this year.
- **Acuity is rising.** "Low needs" cases declined from 41% to 23% of the total, meaning complex needs now comprise the majority of demand.
- Future demand will keep rising.
 - Low: 841 households
 - Medium: 926 households
 - High: 997 households
- **Social lettings are declining.** Reduced move-on capacity is driving blockages throughout the system—contributing directly to longer stays in TA and supported accommodation.

Structure of this section

This section follows the 'journey' of applicants, from initial presentation and assessment through to pathways out of homelessness/move-on, to assess changes in drivers, needs and outcomes across time and key cohorts.



Context | socio-economic factors that drive demand

Cambridge generally compares favourably to its statistical neighbours across socio-economic indicators

The table below compares z-scores* of socio-economic indicators in Cambridge against its Near Neighbours. **In many areas Cambridge compares favourably to its near neighbours.** Key exceptions being house price:income ratio, and the unemployment rate. Additionally, a greater reliance on the private rented sector highlights the inaccessible and stretched nature of the housing market in the city. All of which present and create a greater risk of insecure housing.

Indicator	Cambridge	Oxford	Crawley	Welwyn Hatfield	Reading	Stevenage
Employment						
Employment rate (%)	-0.61	0.44	-0.07	0.2	1.66	-1.62
Unemployment rate (%)	2.13	-0.56	-1.01	-0.11	-0.34	-0.11
Economic inactivity (%)	-0.15	-0.24	0.5	0.05	-1.76	1.6
General Health						
% Very good health	1.69	0.4	-0.48	-0.88	0.56	-1.29
% Good health	-1.22	0.05	0.37	0.85	-1.38	1.32
% Fair/Poor/Very poor health	-1	-0.21	0.44	0.49	-0.39	0.68
Life satisfaction	0.95	0.53	0	-0.53	0	-0.95
Education						
% NVQ4+ (16-64)	1.5	1.02	-0.23	-0.13	0.4	-2.56
% No qualifications (16-64)	-1.42	-1.11	-0.41	-0.08	-0.82	3.84
Affordability and housing market						
Median gross annual income (£)	-0.68	-0.22	-1.01	-0.47	1.03	-1.64
Median house price (£)	1.33	1.12	-0.08	0.71	-0.06	-3.02
LQ House price:Income ratio	1.38	1.19	-0.38	0.78	-0.49	-2.47
% Private rented	0.4	0.25	-0.75	-0.25	0.43	-0.08
Rough sleeping count	0.29	0.88	-0.6	-1.11	0.43	-0.09

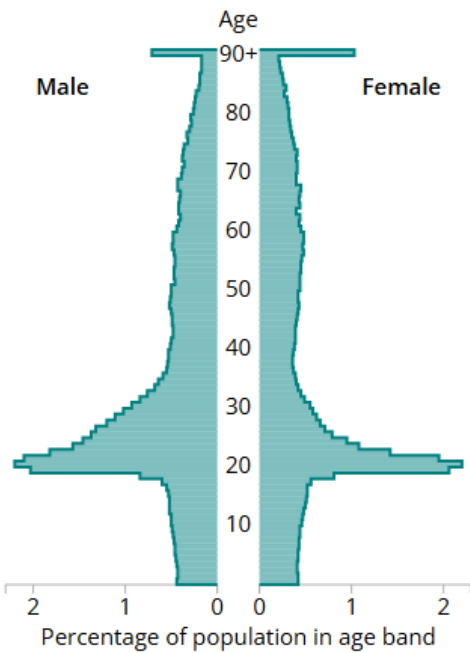
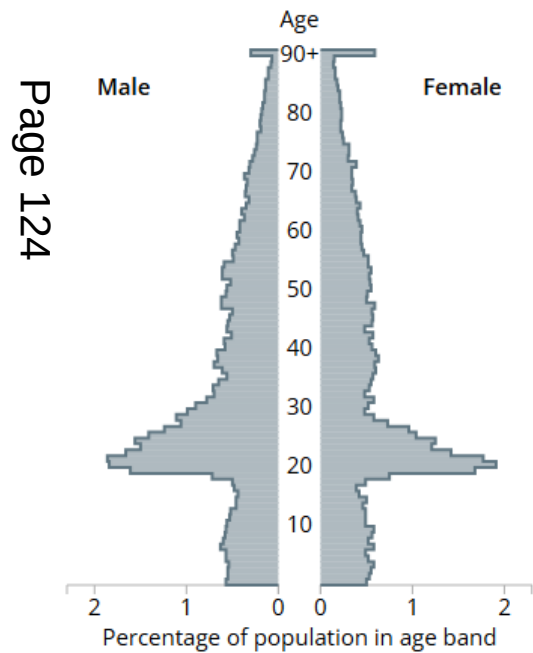
*A z-score standardises difference from the average. A z-score of less than zero means the value is below the average.

Context | population growth projections

The ONS projections based on the census suggest that the city’s population will continue to grow

125,758 people in 2018
All ages
65,175 males 51.8%
60,583 females 48.2%

127,143 people in 2038
All ages
67,911 males 53.4%
59,232 females 46.6%



Commentary

ONS data allows us to see how Cambridge’s population will change over the coming decades.

At a national level, it is projected that the rate of population growth will slow, and that in most areas the population will age – driven by lower birth rates and increased levels of internal migration toward economic centres.

The ONS data suggests that Cambridge will be an outlier from these national patterns.

The two pyramids to the right show that between 2018 and 2038 it is likely that the rate of population growth will remain low – growing by around 1%. The age and gender profile of the city is not expected to shift in any substantial way.

This will be due to the transient, student population of the city – it also reflects that the city draws in working age people and has a strong, high value labour market.

Source: Office for National Statistics, local area population projections

Context | demographics and demand

Gender of people owed a prevention or relief duty

Commentary

Public datasets allow us to compare the gender identity of single people owed either a prevention or relief duty and compare this to the five statistical neighbours (Crawley, Oxford, Reading, Stevenage and Welwyn Hatfield). There are some clear, though unexplained, variations between Cambridge and its neighbours. For example, a far greater proportion of people owed either a prevention or relief duty are single people (either male or female) without dependent children. Single parents are far more likely to be female in Cambridge compared to statistical neighbours – though the variation in Cambridge is far smaller, highlighting that female single parents are underrepresented relative to statistical neighbours.

Prevention

	Cambridge	Statistical Neighbours
Single Parent		
Male	2%	2%
Female	13%	22%
Gender not known	0%	0%
Single Adult (no dependent children)		
Male	36%	28%
Female	27%	19%
Gender not known	0%	0%

Relief

	Cambridge	Statistical Neighbours
Single Parent		
Male	2%	2%
Female	11%	15%
Gender not known	0%	0%
Single Adult (no dependent children)		
Male	56%	39%
Female	23%	18%
Gender not known	1%	0%

Context | demographics and demand

Age, sexuality and ethnicity of people owed a duty

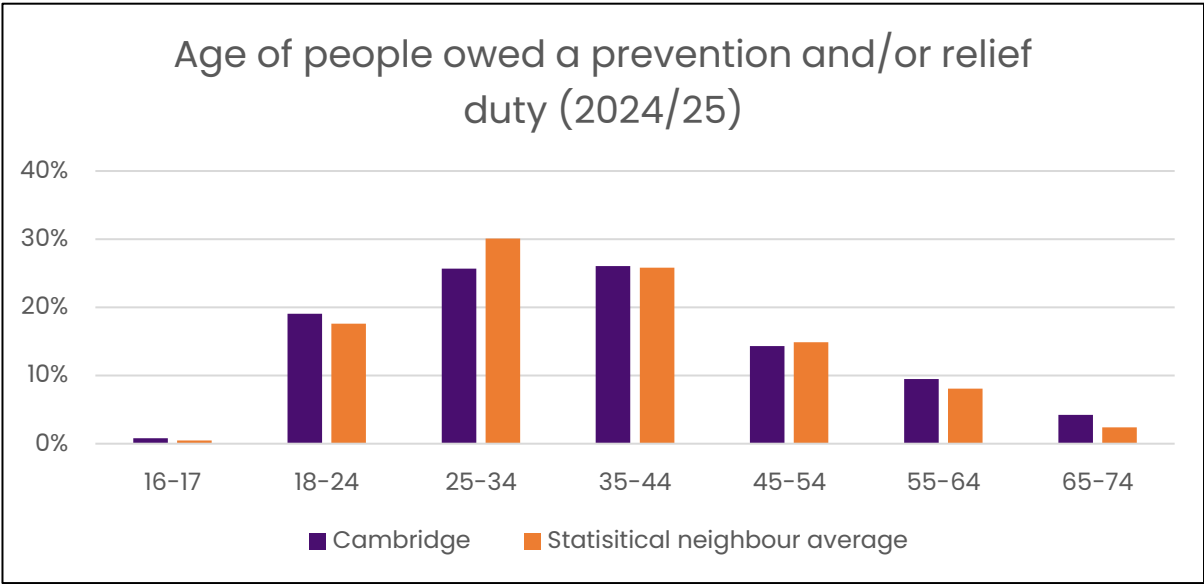
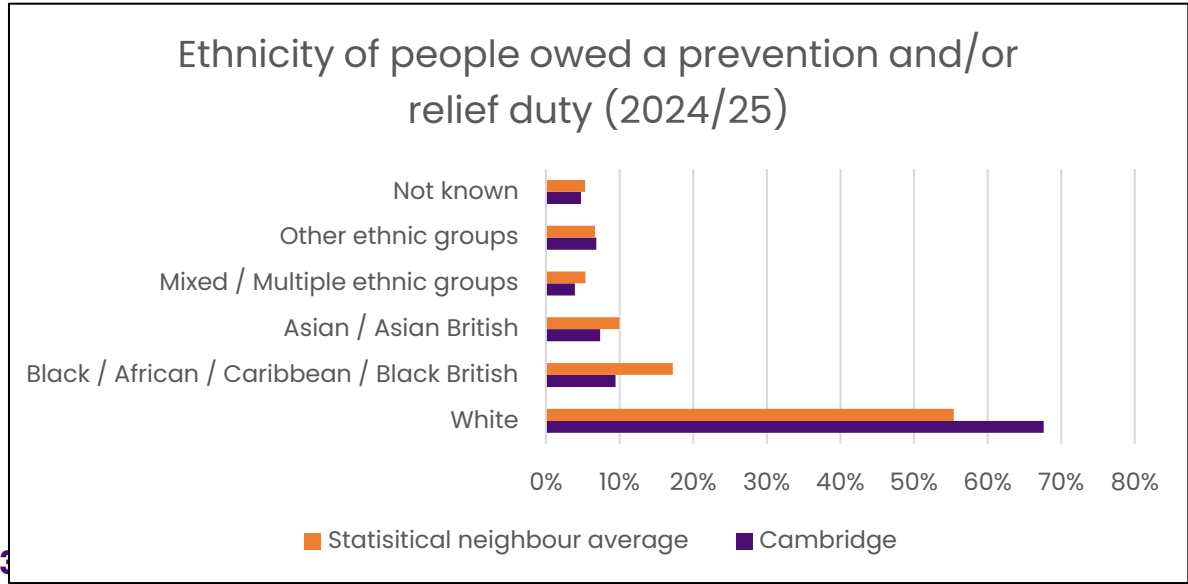
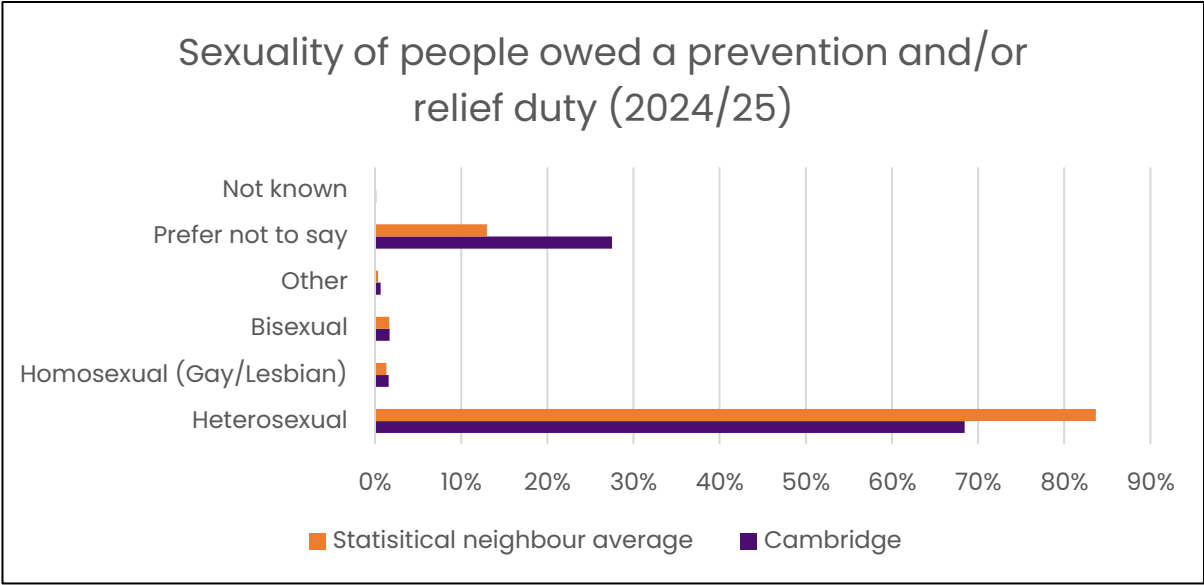
Commentary

These three charts highlight how the demographic profile of people approaching the city council for an assessment compares to the five statistical neighbours.

Overall, the age profile of this group is broadly comparable to statistical neighbours.

However, the ethnicity profile of Cambridge is notably. Of people owed a prevention or relief duty in Cambridge, 68% were White – the figure in nearest neighbours was 55% on average.

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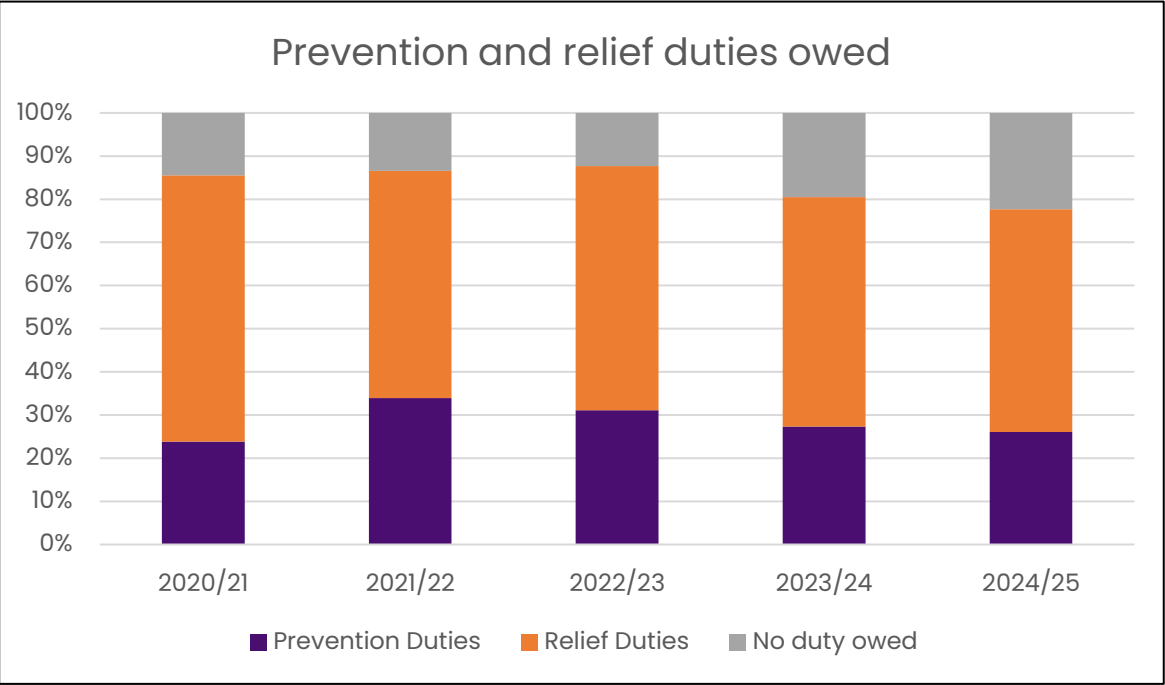
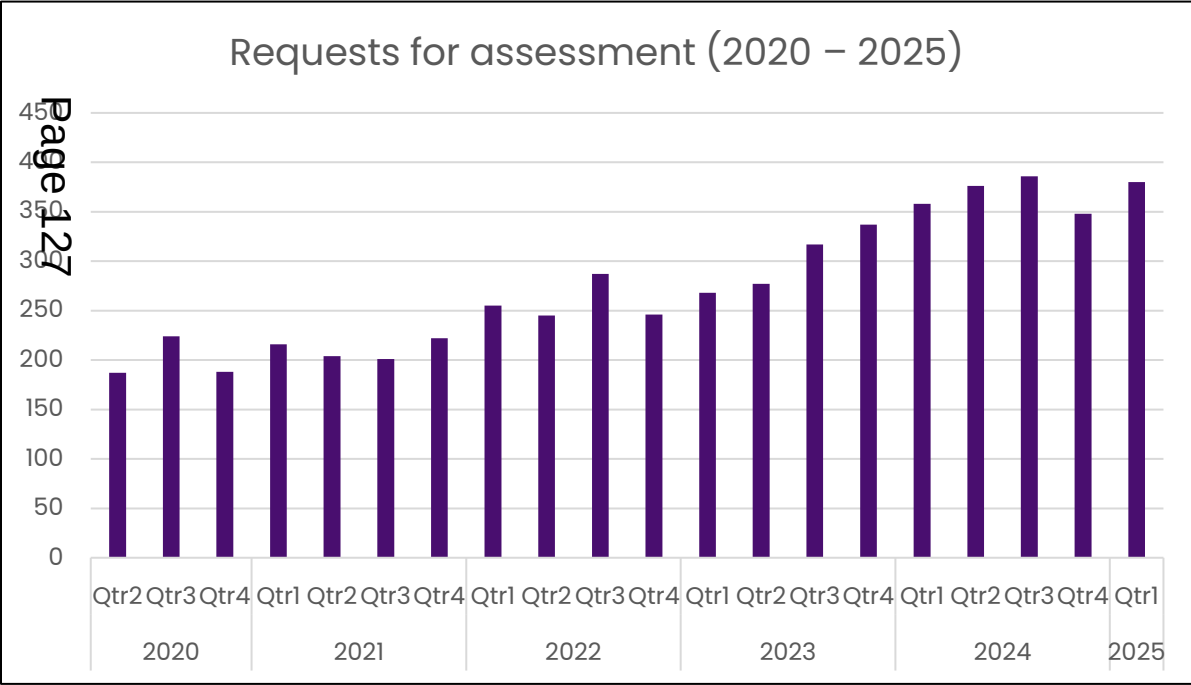
Initial presentations and assessments

The number of requests for assessment has increased by nearly 80% since 2020/21

Commentary

The below left chart shows the number of requests for assessments in Cambridge has increased rapidly over the last five years. A total increase of 127% has been recorded – though the data suggests that the rate of increase may have slowed over the last three financial quarters.

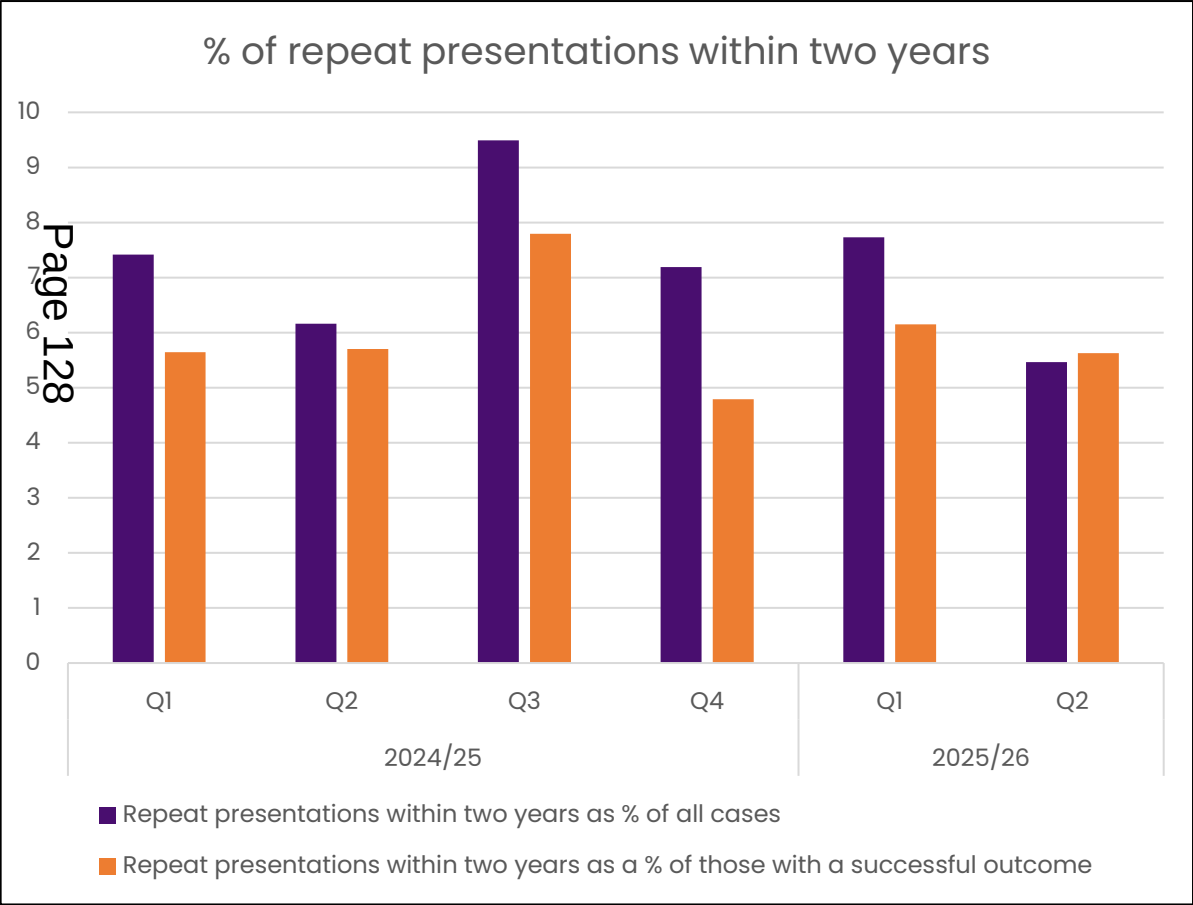
The majority of the increase occurred through 2022 and 2024 – this is likely linked to the end of Covid-19 support schemes. At the same time, there has been a steady decrease in the proportion of people owed a prevention duty and a corresponding increase in those found to not be owed a duty.



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Repeat assessments

The proportion of people who re-approach the Council within two years



Commentary

Repeat presentations provide a useful metric to understand how effectively the system and tenancy sustainment support are working.

A higher proportion of repeat assessments would suggest that prevention and relief duties were being closed at a time, or in a way, that was not leading to a sustainable positive outcome.

Over the last six quarters (Q1 2024/25 – Q2 2025/26) an average of 7.2% of all cases were repeat assessments, of a case that had previously been assessed.

In the same period, 5.9% of assessments were for someone who had previously secured a positive accommodation outcome.

While these two rates have fluctuated, there is no clear trend.

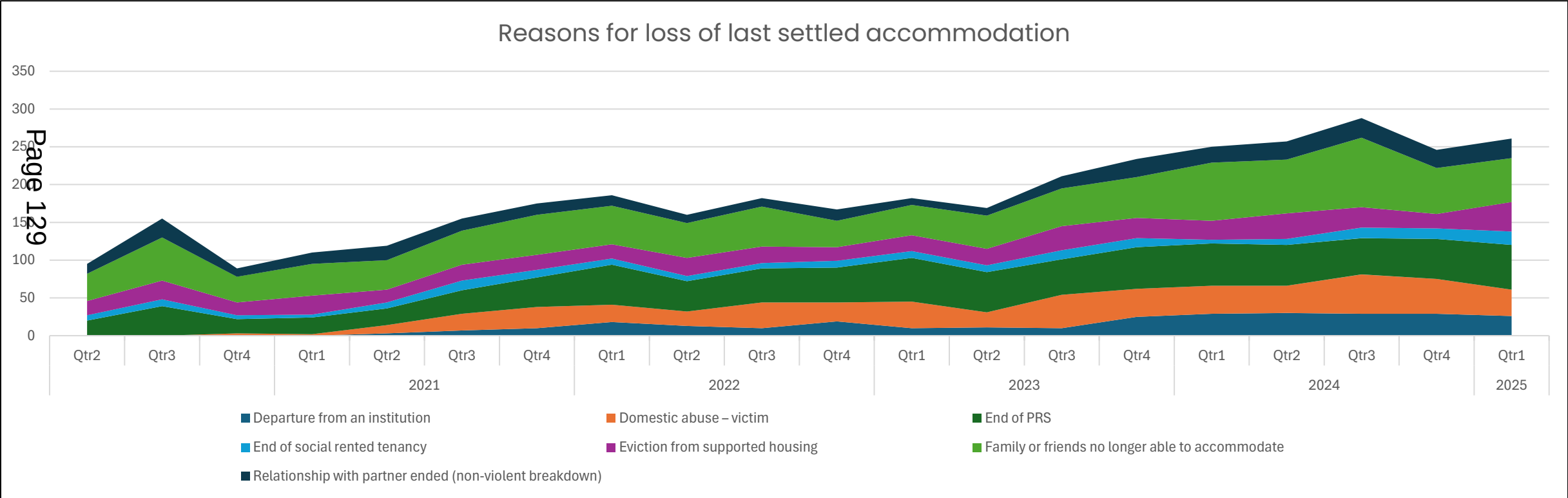
Additionally, the average rates we have seen are low – suggesting that repeat assessments are not an endemic issue.

However, we should note that these figures only cover statutory homelessness – there may be a substantial number of additional cases that are cycling in and out of homelessness but are not picked up in this dataset.

Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Demand drivers – loss of last settled accommodation

“Family or friends no longer able to accommodate” is the most common reason for people to have lost their last settled accommodation, but it has not significantly increased as a proportion of the total. End of PRS and Domestic Abuse (victim-survivor) have increased rapidly as a proportion of the total, and leaving custody has also seen a significant rise.



Source: Cambridge City Council, Statutory Case Management Data ((Q2 2020 – Q1 2025))

Demand drivers – accommodation at time of application

PRS has increased most rapidly as an “accommodation type” at the time of a statutory homeless application

	2020/21	2021/22	2022/23	2023/24	2024/25
Owner-occupier	6	5	4	10	14
Registered Provider tenant	17	16	15	21	39
Looked after children placement	3	2	1	13	29
Refuge	18	23	25	33	33
Departure from hospital	14	17	14	25	35
Temporary accommodation	18	29	38	68	55
Homeless on departure from institution: Custody	44	61	54	67	72
Social rented supported housing or hostel	52	68	67	83	95
Council tenant	46	49	48	65	94
Living with friends	68	75	101	105	108
Rough sleeping (in judgement of assessor)	84	56	66	96	143
No fixed abode	87	75	89	137	159
Living with family	145	152	140	156	201
PRS	86	134	190	230	225
TOTAL	688	762	852	1109	1302

Commentary

Over the course of the last five years, we have seen levels of demand for assessments more than double, increasing by over 140%.

To understand some of the drivers of this rapid increase in demand, we have looked at the last settled accommodation, to see if any particular accommodation type is driving demand.

In the last financial year, **PRS was the most common place of last settled accommodation accounting for 17% of all assessments.**

This figure has grown substantially over the last five years – in **2020/21 PRS accounted for 12% of all assessments.**

In this time PRS has overtaken “Living With Family” as the most common last settled accommodation type at time of application.

This clearly shows that issues in the PRS are playing a greater role in driving demand than other accommodation types. However, we should be mindful that all accommodation types have seen rapid increases as a source of demand.

While PRS may have grown as a driver in relative terms, all types have grown in absolute terms; suggesting systemic factors.

Demand drivers – support needs at assessment

How primary support needs have changed

- “Low needs” remains the most common support need described in the data. While in absolute terms it has remained steady, it has dropped rapidly in real terms. In 2020 it accounted for 41% of primary need type, in 2025 it is just 23%.
- At the same time, overall demand has increased by nearly 60%. This suggest both a rapid increase in demand and a rising acuity of need.

	2020	2021	2022	2023	2024	2025
Physical or sensory disability	10		3	5	5	5
Young people at risk of exploitation	10	11	12	4	10	5
Autism spectrum	3	9	10	14	15	14
Learning disability	9	7	13	14	14	16
Mental health issues - offender	14	28	27	14	29	16
Refugee/asylum seeker	2	3	5	13	18	21
Age related infirmity	1	1	5	9	19	31
At risk from domestic abuse	12	13	13	24	34	34
Physical health issues	2	16	22	39	64	54
Offender or at risk of offending	45	48	37	52	68	71
Care leaver	8	8	25	44	88	94
Alcohol problems	73	59	52	80	115	102
Drug problems	66	85	76	117	117	115
Mental health issues	99	111	109	146	180	165
Low needs - main issue is housing	249	289	217	217	218	219
TOTAL	603	688	626	792	994	962

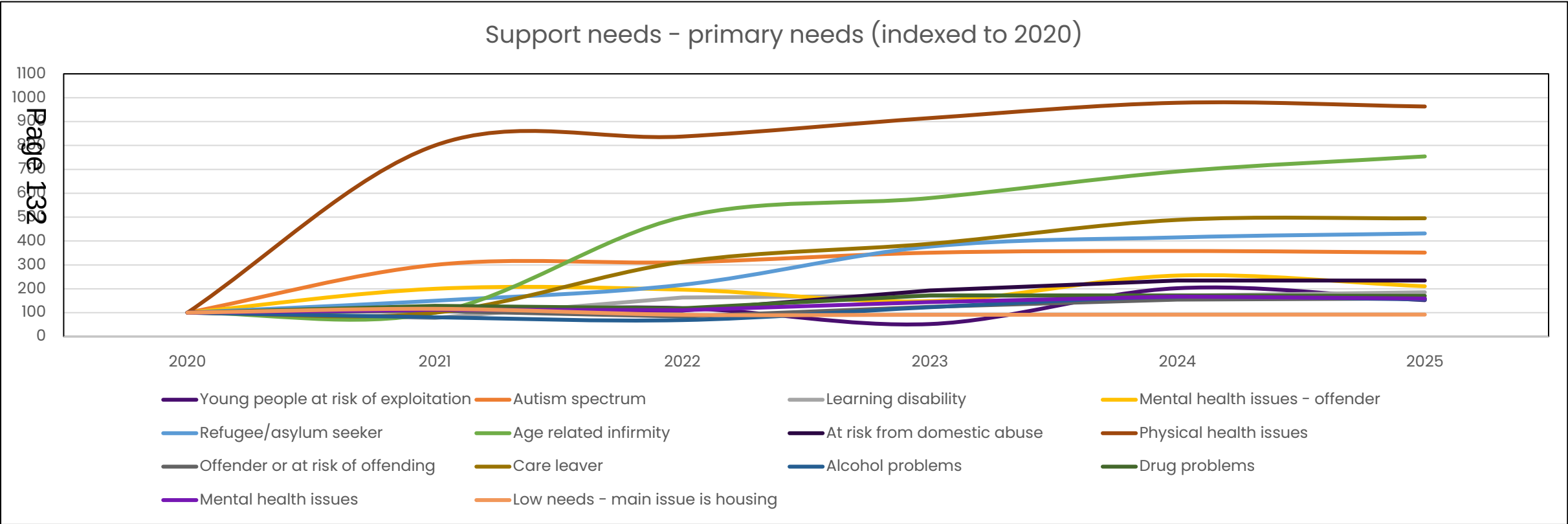
	2020	2021	2022	2023	2024	2025
Physical or sensory disability	1.66%	0.00%	0.48%	0.63%	0.50%	0.52%
Young people at risk of exploitation	1.66%	1.60%	1.92%	0.51%	1.01%	0.52%
Autism spectrum	0.50%	1.31%	1.60%	1.77%	1.51%	1.46%
Learning disability	1.49%	1.02%	2.08%	1.77%	1.41%	1.66%
Mental health issues - offender	2.32%	4.07%	4.31%	1.77%	2.92%	1.66%
Refugee/asylum seeker	0.33%	0.44%	0.80%	1.64%	1.81%	2.18%
Age related infirmity	0.17%	0.15%	0.80%	1.14%	1.91%	3.22%
At risk from domestic abuse	1.99%	1.89%	2.08%	3.03%	3.42%	3.53%
Physical health issues	0.33%	2.33%	3.51%	4.92%	6.44%	5.61%
Offender or at risk of offending	7.46%	6.98%	5.91%	6.57%	6.84%	7.38%
Care leaver	1.33%	1.16%	3.99%	5.56%	8.85%	9.77%
Alcohol problems	12.11%	8.58%	8.31%	10.10%	11.57%	10.60%
Drug problems	10.95%	12.35%	12.14%	14.77%	11.77%	11.95%
Mental health issues	16.42%	16.13%	17.41%	18.43%	18.11%	17.15%
Low needs - main issue is housing	41.29%	42.01%	34.66%	27.40%	21.93%	22.77%

Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Demand drivers – support needs

Looking just at support needs, we can see that the most common primary need or support type is “physical health”.

“Age related” infirmity has increased at a similar rate. This suggests that ageing, frailty and potentially people living with multiple, long-term conditions are the leading demand drivers.

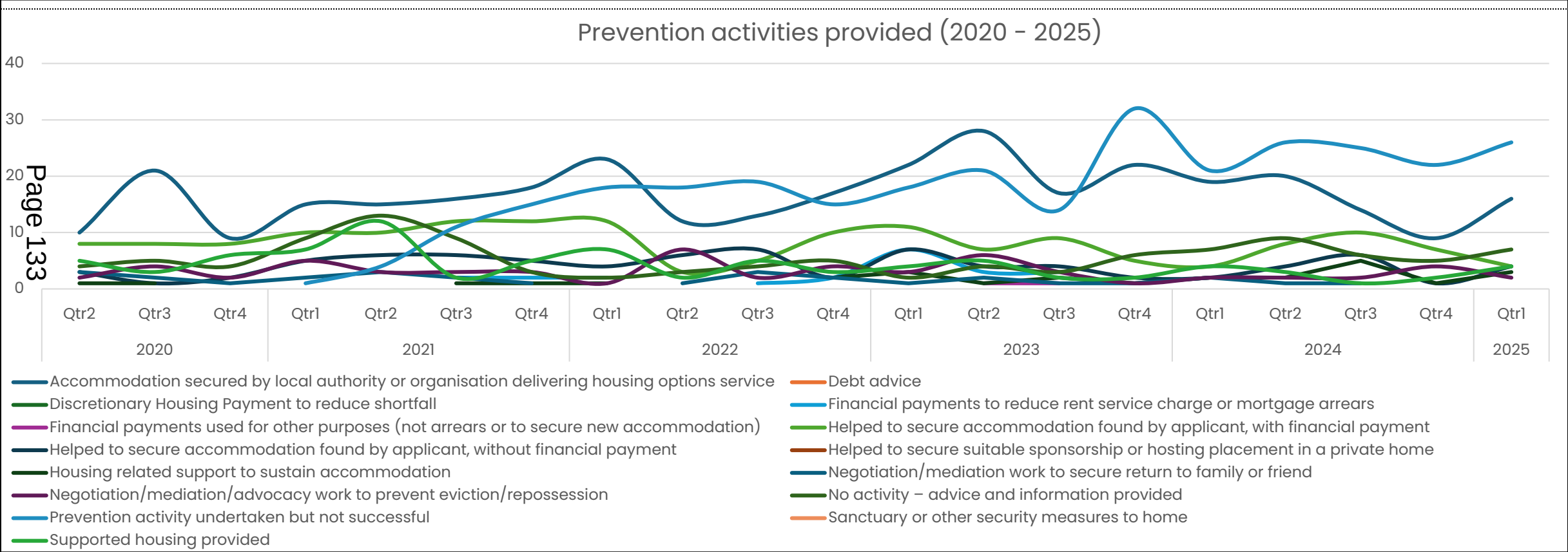


Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Prevention activities

Activities provided during prevention duty period

The most common prevention duty activity recorded is “Prevention activity undertaken but not successful”. At the start of 2021 this was the least common activity recorded – the number of prevention duties that result in this outcome increased three-fold from 31 in 2021/22 to 99 in 2024/25.

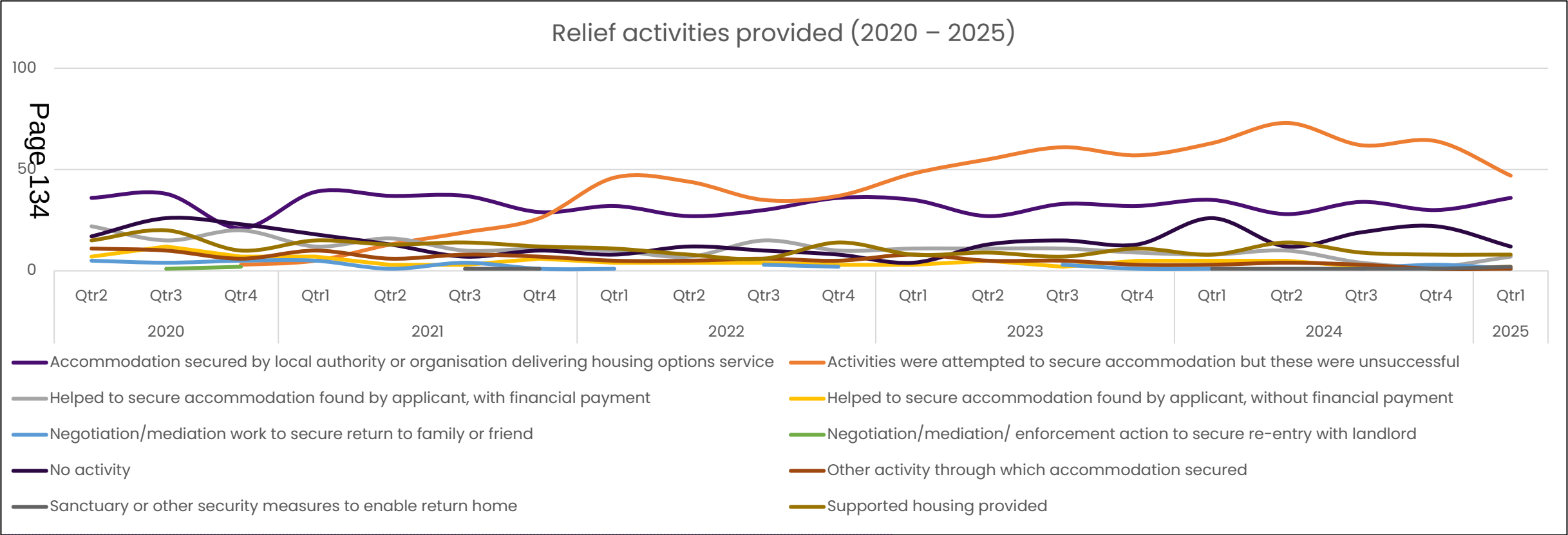


Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Relief activities

Activities provided during the relief duty period

The most common relief activity recorded is that attempts were made to secure accommodation, but were unsuccessful. This outcome increased by 3.5 times, from 63 in 2020/21 to 246 in 2024/25. This reflects some of the systemic challenges around capacity and sufficiency in housing options across the city, compounded by the rapid increase in demand we have seen over this period.

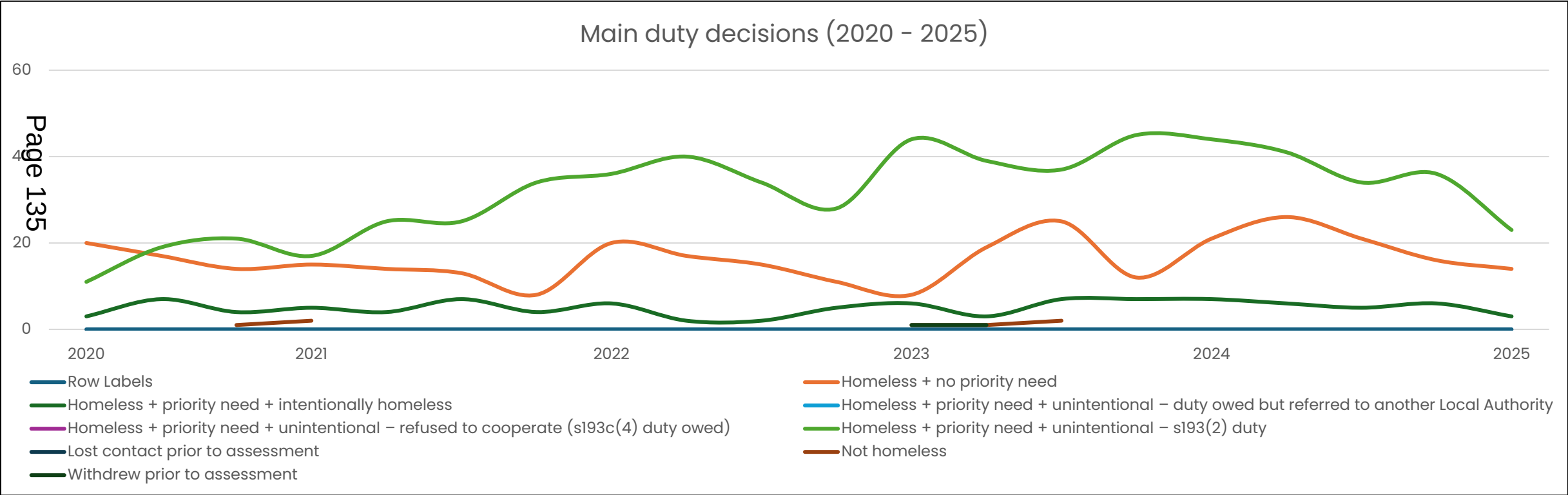


Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Main duty decisions

Outcomes of main duty decisions

In the last financial year (2024/25) 236 people received a main duty assessment. This figure has increased by nearly 40% since 2020/21. Over the same period, the proportion of decisions that resulted in someone being owed a section 193 (2) duty increased rapidly, and the absolute number has increased by 98%. This suggests that not only has demand increased, but also that needs have increased.



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Service user groups

Pathway 1

Young People & Care Leavers

Individuals aged 16–24, including those transitioning out of care

Pathway 3

Families

Households with dependent children

“Priority” singles

Single adults who meet priority need thresholds due to vulnerability, health needs, or other priority criteria e.g. domestic abuse

Pathway 4

“Non-priority” singles

Single adults who do not meet the legal threshold for priority support but are still at risk of or experiencing homelessness (range of support needs)

Rough sleepers

Individuals who are sleeping outdoors or in places not meant for habitation, such as streets or abandoned buildings

Pathway 5

No recourse to public funds

Individuals with NRPF due to their immigration status (e.g. asylum seekers, those on temporary visas, undocumented migrants)

Pathway 2

Victim-survivors (& perpetrators) of domestic abuse

People made homeless or at risk due to domestic abuse – may overlap with priority singles or families

Map relevant services in pathway 4 initially

People with severe and multiple disadvantage

People facing overlapping challenges such as homelessness, substance misuse, mental health issues, and contact with the criminal justice system. Can cover all the cohorts outlined above.

Understanding the cohorts

This our indicative assessment of the size of each cohort in 2024/25, to help us understand the “baseline” level of demand in the system. This is based on available data and involves some reasonable assumptions.

		Count	Methodology / Source
Pathway 1	Young people and care leavers	39	H-CLIC age breakdown provided (nb – loss of last settled accommodation due to leaving LACP = 30)
Pathway 2	Victim-survivors of domestic abuse	170	Statutory case management data
	Perpetrators of domestic abuse	11	Statutory case management data
Pathway 3	Families	313	All families (nb – 57 received main duty)
	Priority Singles	82	Singles who recieved a main housing duty following unsuccessful prevention or relief duties, and those with priority need assessed as intentionally homeless.
Pathway 4	Non-priority singles	227	227 began the pathway as a non-priority single – 82 became priority.
	Rough sleepers	70 (24 snapshot)	H-CLIC – people owed a relief duty as “rough sleeping”. Autumn 2024 rough sleeping in England snapshot.
Pathway 5	NRPF	14	Identified by Street Outreach team

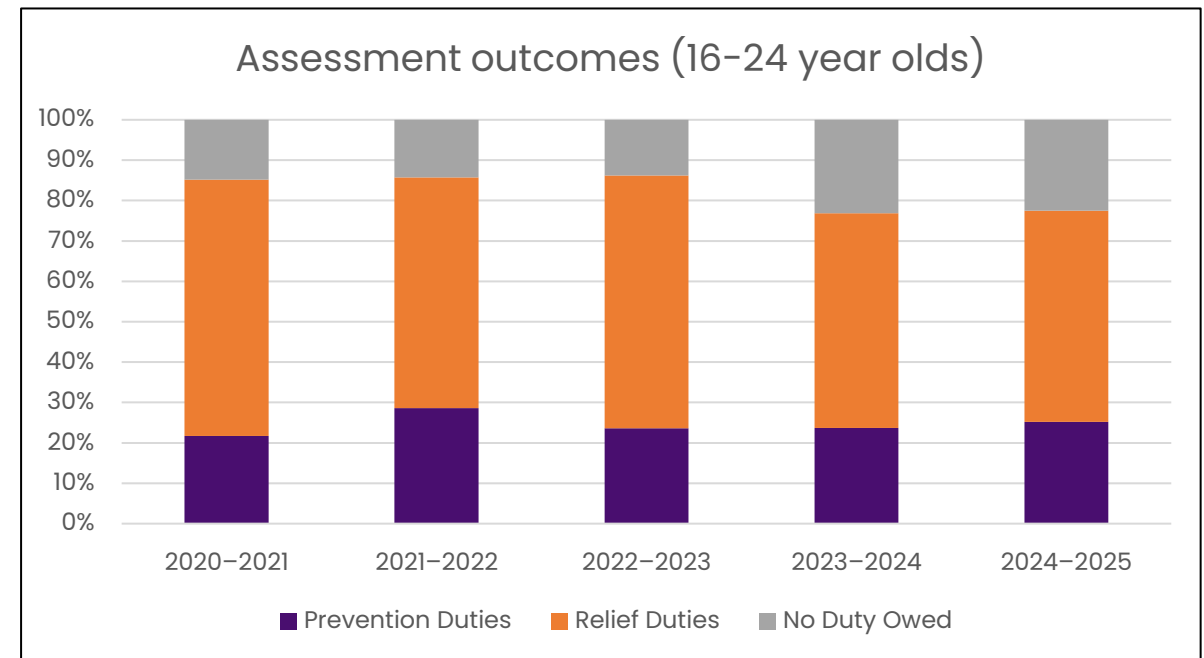
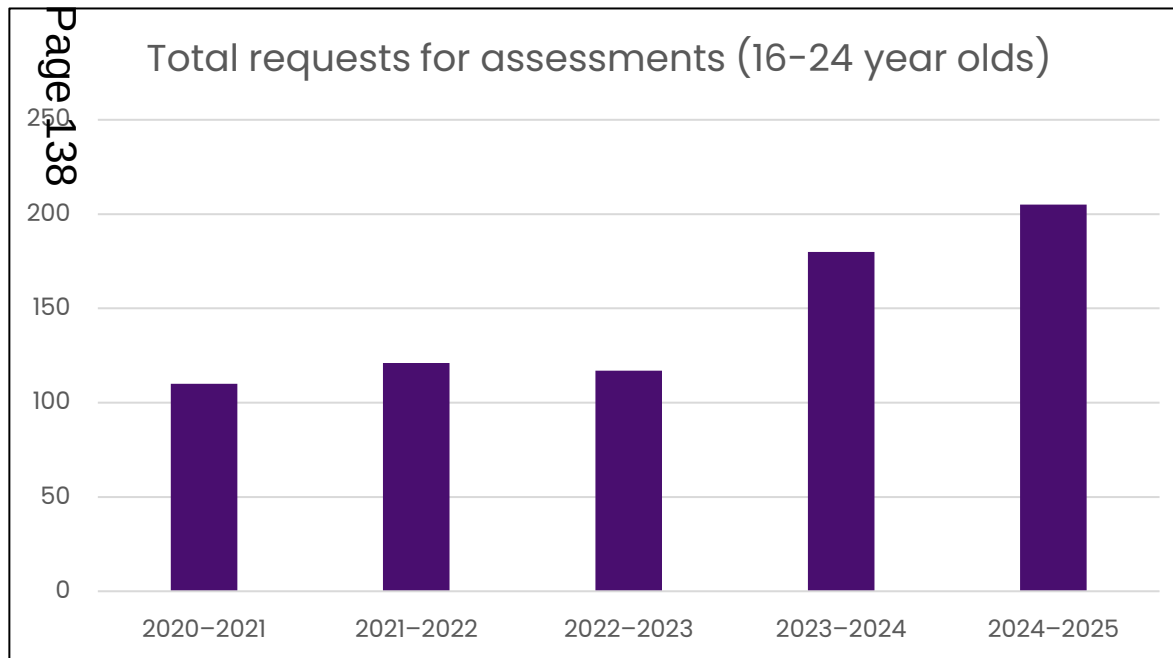
Pathway 1 – assessments and duties owed (16–24)

The number of young people requesting an assessment has increased rapidly

Among children and young people (aged 16–24 years) there has been a substantial increase in requests for assessments in recent years. In 2024/25 there were 206 people in the age group – this has nearly doubled since 2020/21, having increased by 86%.

A small proportion of this age group are care leavers. Only 14% of people who requested an assessment in 2024/25 and were aged 16–24 were also recorded as care leavers.

Over the same period, the proportion of assessments that resulted in “no duty” being owed has increased as a proportion of the total, this increase is offset by a decrease in relief duties.



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

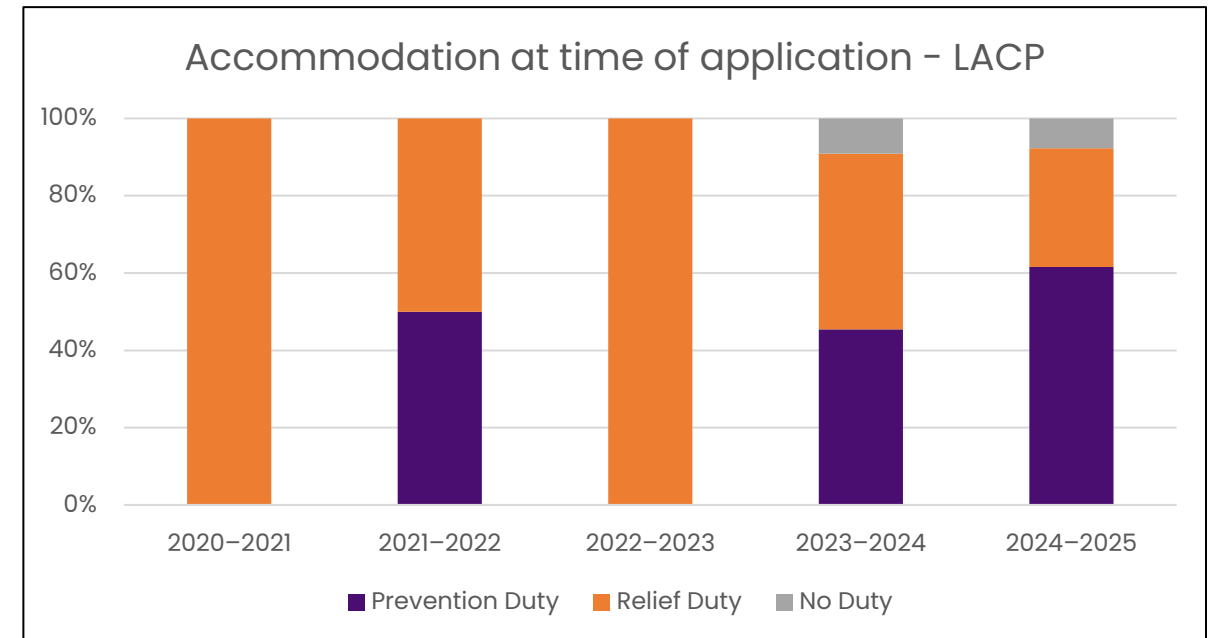
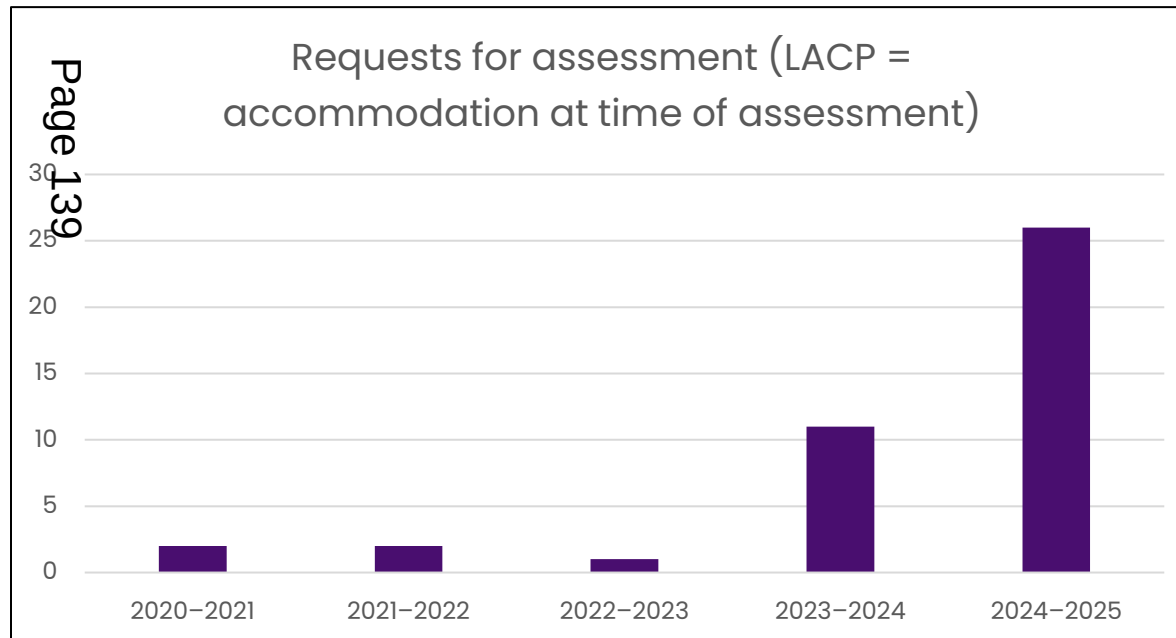
Pathway 1 – assessments and duties owed (care leavers)

Care leavers requesting an assessment has increased, but there has been substantial variation and no clear trends

Over the last five financial years there has been a rapid increase in the number of people requesting an assessment with their current accommodation recorded as a Looked After Child Placement (LACP).

In 2024/25 a total of 26 people in a LACP requested an assessment – an increase of over two-fold compared to the previous year.

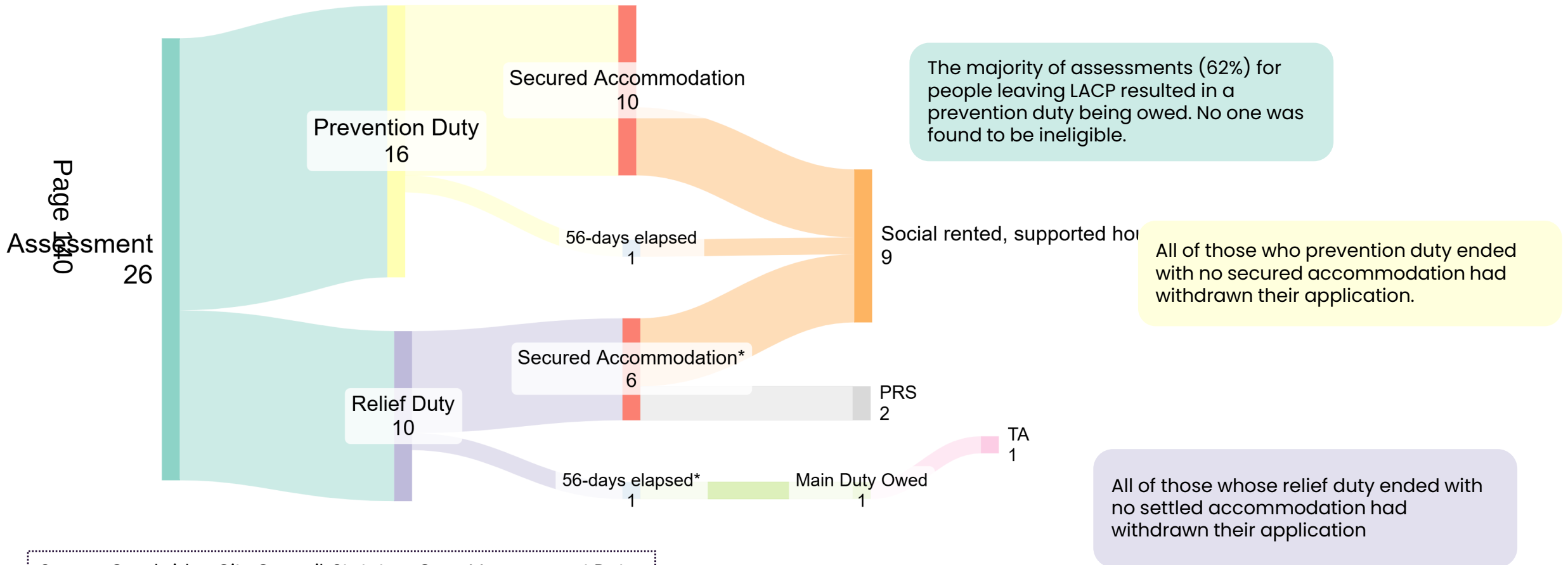
The most common outcome for this group is that they were owed a prevention duty. Nearly 60% of these applicants were owed a prevention duty, while just under a third (31%) were owed a relief duty.



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Pathway 1 – routes to settled accommodation (care leavers)

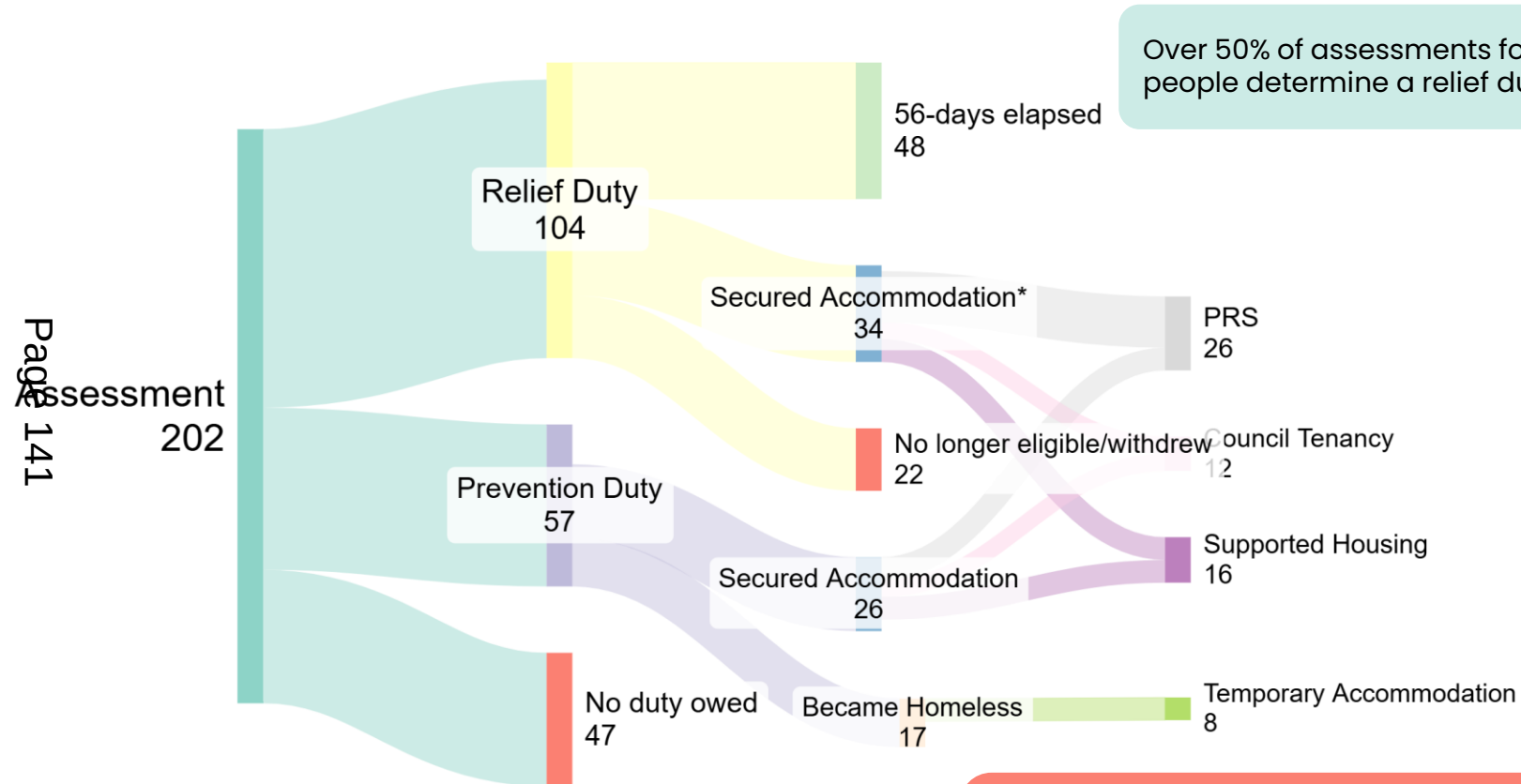
Routes to secure accommodation – young people and care leavers in 2024/25 (LACP data point)



Source: Cambridge City Council, Statutory Case Management Data

Pathway 1 – routes to settled accommodation (16–24)

Routes to secure accommodation for young people (2024/25)



46% of relief duties ended with 56-days elapsed. The table below provides the accommodation outcomes

56-days elapsed	
No fixed abode: not rough sleeping	3
No fixed abode: rough sleeping	1
Not known	4
Other	2
Private rented sector: self-contained	1
Refuge	2
Registered Provider tenancy	1
Staying with family	5
Staying with friends	2
Temporary accommodation provided by local authority	27

Source: Cambridge City Council, Statutory Case Management Data

Nearly a quarter (23%) of assessments found that no duty was owed. An additional 10% became ineligible or withdrew their application during their duty period.

Pathway 1 – prevention and relief activities (16–24)

Prevention and relief activities

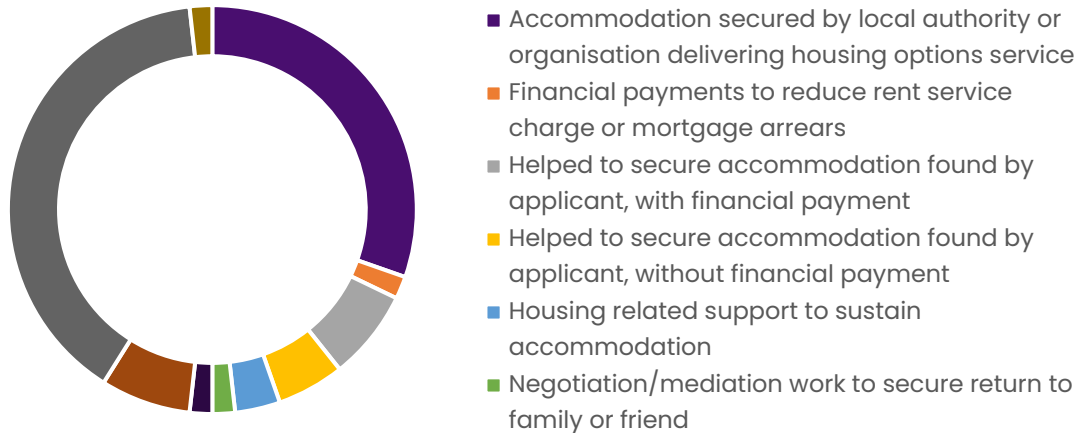
In 2024/25 nearly half (46%) of prevention duties resulted in accommodation being secured. The chart to the left highlights some of the activities undertaken that resulted in this outcome.

The most common prevention activity to lead to a successful outcome was where accommodation was secured by the local authority. However, 39% of prevention activities undertaken did not result in any accommodation being secured.

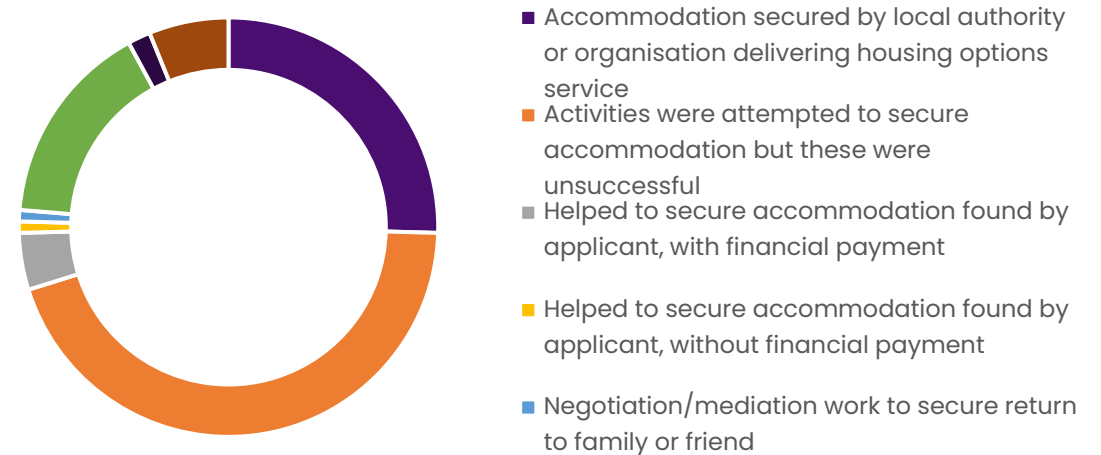
Only one third (33%) of relief duties resulted in accommodation being secured. As with prevention, the most common activity to result in a successful outcome was where the local authority had secured accommodation. In 45% of relief duties activities were undertaken but were not successful.

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Prevention activities - 2024/25 (N = 57)



Relief Activities - 2024/25 (N=104)



Source: Cambridge City Council, Statutory Case Management Data

Pathway 1 – relief and prevention outcomes (16–24)

Outcomes of relief and prevention activities

These tables provide a breakdown of the outcomes of relief and prevention activities provided to 16–24 year olds at the prevention and relief phase.

	Reason for end - Prevention duty
56 days or more expired and no further action	8
Homeless	17
No longer eligible	1
Refused suitable accommodation	1
Secured alternative accommodation for 12 or more months	11
Secured alternative accommodation for 6 months	13
Secured existing accommodation for 12 or more months	2
Withdrew application	3

	Accommodation (prevention)
Council tenancy	6
No fixed abode: not rough sleeping	3
Other	4
Owner-occupier	2
Private rented sector: HMO	4
Private rented sector: self-contained	5
Registered Provider tenancy	4
Social rented supported housing or hostel	5
Staying with family	5
Temporary accommodation own arrangement	1
Temporary accommodation provided by local authority	7

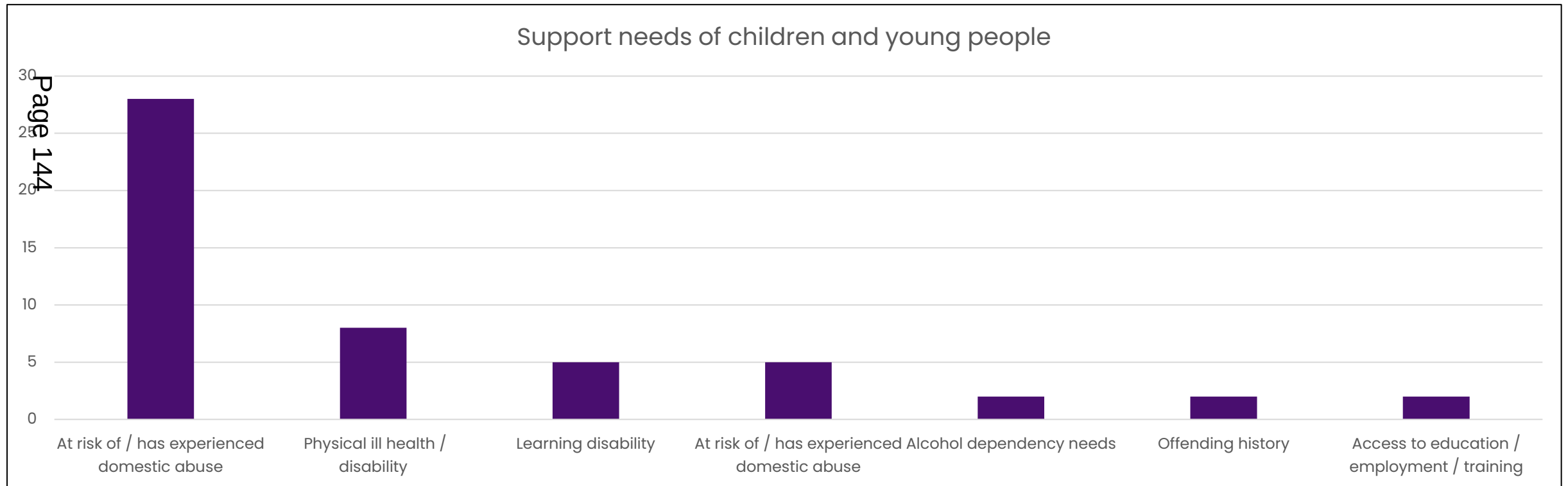
	Reason for end of relief duty
56 days elapsed	48
Applicant has refused a suitable offer, which was not a final offer	1
Contact lost	5
Intentionally homeless from accommodation provided	1
Local connection referral accepted by other LA	11
No longer eligible	1
Secured accommodation for 12 months	17
Secured accommodation for 6 months	17
Withdrew application	13

	Accommodation outcome - relief
Council tenancy	6
No fixed abode: not rough sleeping	4
No fixed abode: rough sleeping	4
PRS	10
Refuge	2
Registered Provider tenancy	1
Social rented supported housing or hostel	18
Staying with family	6
Staying with friends	3
Temporary accommodation provided by local authority	28

Pathway 1 – support needs (16–24)

Domestic abuse is the most common support need recorded for young people

Of the 161 young people who were assessed in 2024/25, a total of 28 (17%) had a support need of “At risk of/has experience domestic abuse”. The next most common reason is physical health which only accounts for 5% of cases. Overall – there are more than 80 different support need types recorded, reflecting the wide diversity in support needs across this group.

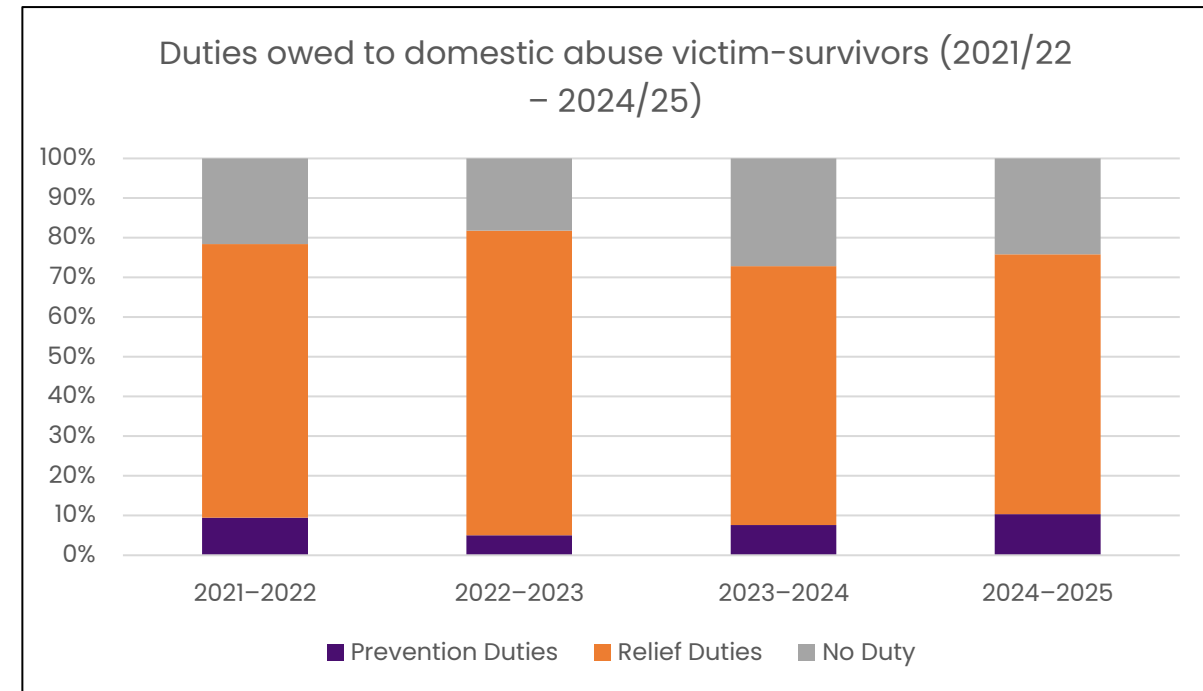
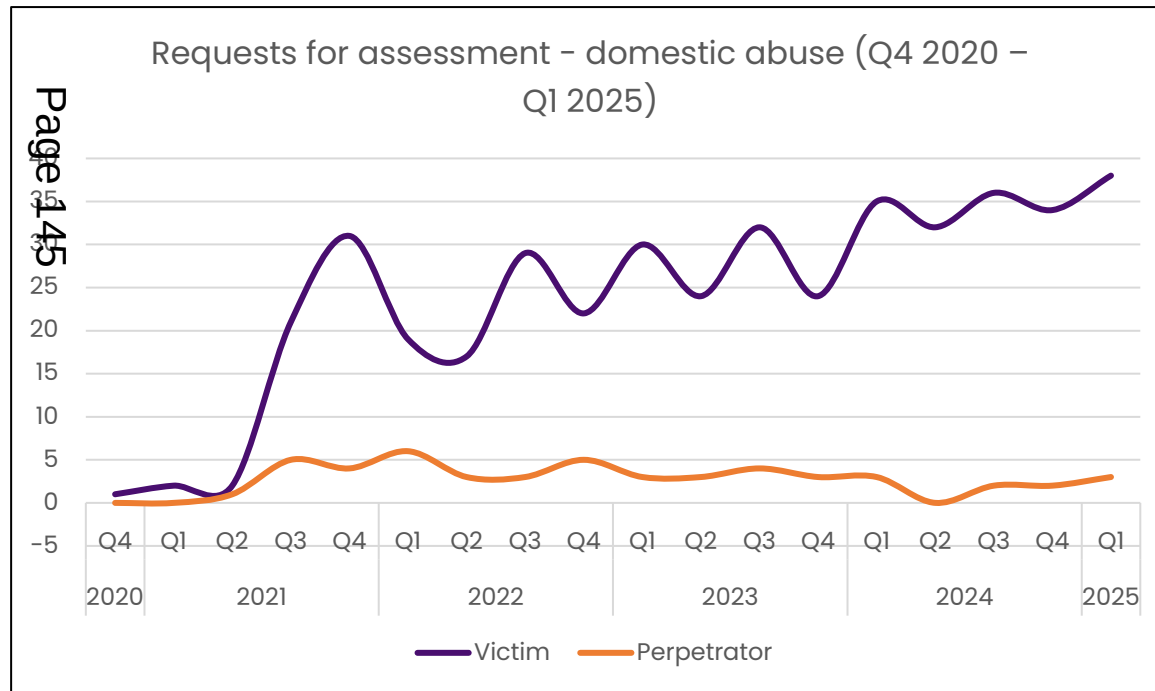


Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Pathway 2 – assessments and duties owed (domestic abuse)

Assessments for victim-survivors and perpetrators of domestic abuse

Applications and **assessments of victim-survivors of domestic abuse have more than doubled** since the introduction of the Domestic Abuse Act in 2021, which granted automatic priority need (171% increase). This increase is **consistent with national trends** and is considered to reflect, at least in part, the fact that **more victim-survivors are now coming forward** for homelessness support as well as improved recording of this as a driver of homelessness. In the same period, we can see that the distribution of duties owed has remained relatively steady, with the majority (~70%) owed a relief duty.



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

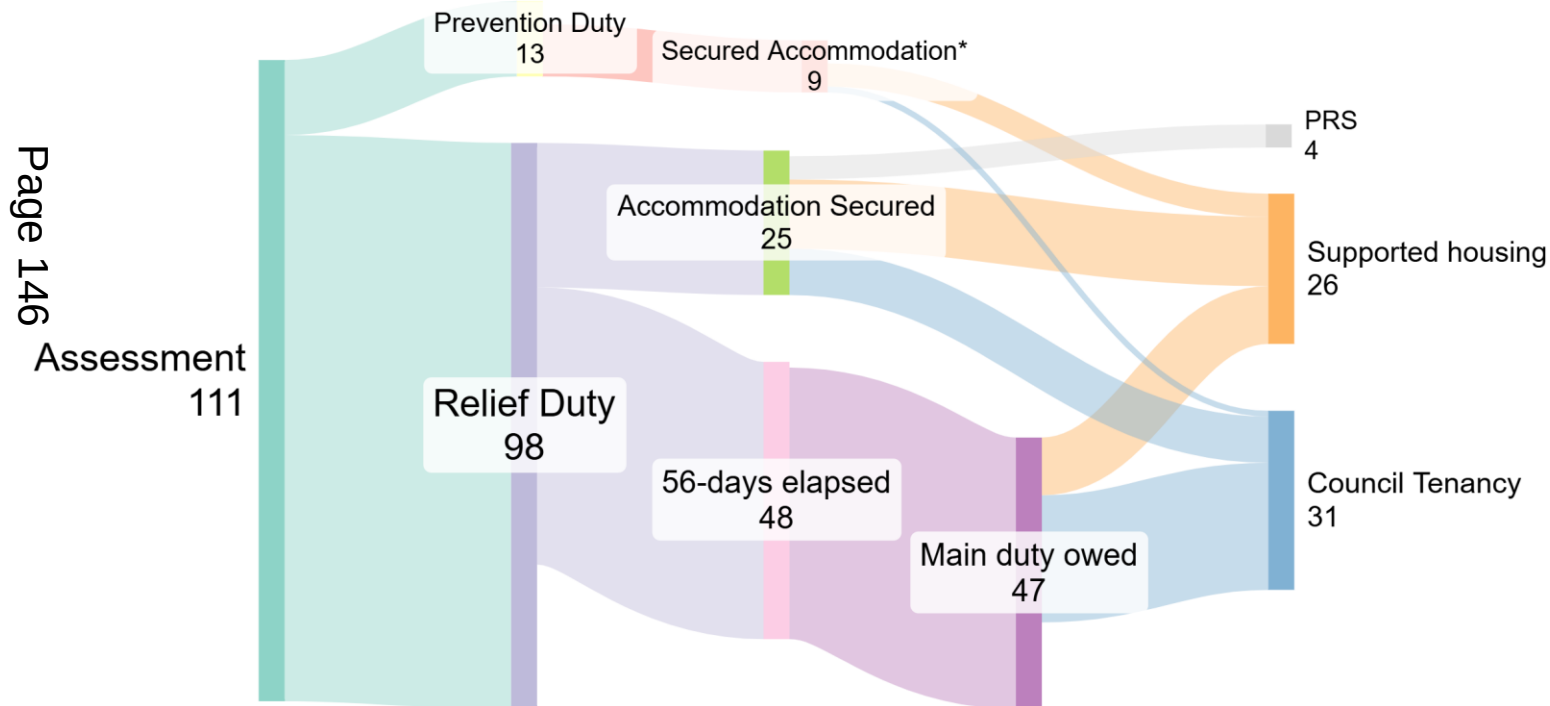
Pathway 2 – user journey (domestic abuse)

Routes to accommodation – victim-survivors of domestic abuse (2024/25)

140 people's reason for loss of last settled accommodation at time of approach was that they were a victim-survivor of domestic abuse in 2024/25. Of these, 111 had a completed assessment

Most assessments (90%) for DA victim-survivors resulted in a relief duty being owed.

Around one third of assessments (31%) resulted in accommodation being secured within 56 days



23% of relief duty ended with no accommodation. The table below sets out the most common reasons.

Reason relief duty ended	Count
Contact Lost	2
Local Connection in another LA	1
No Longer Eligible	1
Refused to cooperate	1
Refused accommodation	1
Withdrew application	9

Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Around 30% of victim-survivors owed a main duty in 24/25 did not find settled accommodation and were in TA.

Pathway 2 – prevention and relief activity (domestic abuse)

In 2024/25 there were 104 people assessed as having lost their last settled accommodation due to domestic abuse.

For people owed a prevention duty, nearly one quarter (23%) successfully secured accommodation during the initial 56-day period. However, a larger proportion (31%) were unsuccessful.

At relief stage, a larger proportion (31%) were unsuccessful. While 40% of domestic abuse victim-survivors were successful in securing accommodation, with accommodation by either the local authority via the housing options service or with accommodation found by the applicant. Additionally, we can see that a small but substantial number of cases were closed at either prevention or relief with information and advice or mediation.

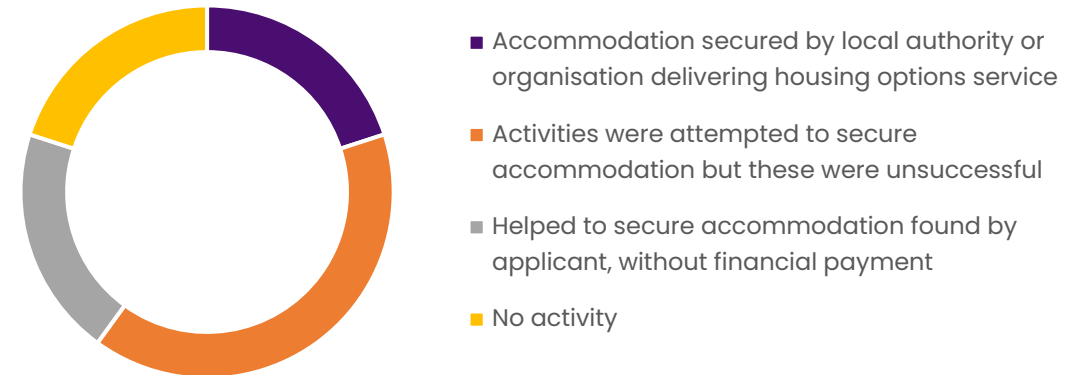
Overall, this suggests that victim-survivors of domestic abuse are often well supported to find settled accommodation. However, a substantial group end their journey unsuccessfully. The next page sets out more detail on specific outcomes for this group.

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Domestic abuse victim-survivors – prevention activities (n = 13)



Domestic abuse victim-survivors – relief activities (n = 94)



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Pathway 2 – duty outcomes (domestic abuse)

Prevention and relief duty – activity and accommodation outcomes in 2024/25

	Reason for end – Prevention duty
Contact lost	1
Refused to cooperate	1
Secured alternative accommodation for 6 months	1
Secured existing accommodation for 12 or more months	1
Withdrew application	1
Secured alternative accommodation for 12 or more months	2
Secured existing accommodation for 6 months	2
Homeless	4

	Accommodation outcome (prevention)
Council tenancy	1
Registered Provider tenancy	1
Staying with family	2
Temporary accommodation provided by local authority	2
Social rented supported housing or hostel	3

Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

	Reason for end of relief duty
Local connection referral accepted by other LA	1
No longer eligible	1
Notice served due to refusal to cooperate	1
Refused final accommodation or final part six offer	1
Contact lost	2
Secured accommodation for 6 months	9
Withdrew application	9
Secured accommodation for 12 months	16
56 days elapsed	48

	Accommodation outcome – relief
No fixed abode: not rough sleeping	1
Other	1
Owner-occupier	1
Not known	2
Private rented sector: HMO	4
Registered Provider tenancy	4
Temporary accommodation own arrangement	4
Council tenancy	8
Social rented supported housing or hostel	8
Refuge	9
Temporary accommodation provided by local authority	34

Pathway 2 – support needs (domestic abuse)

Mental health and physical health needs were the most common recorded support needs

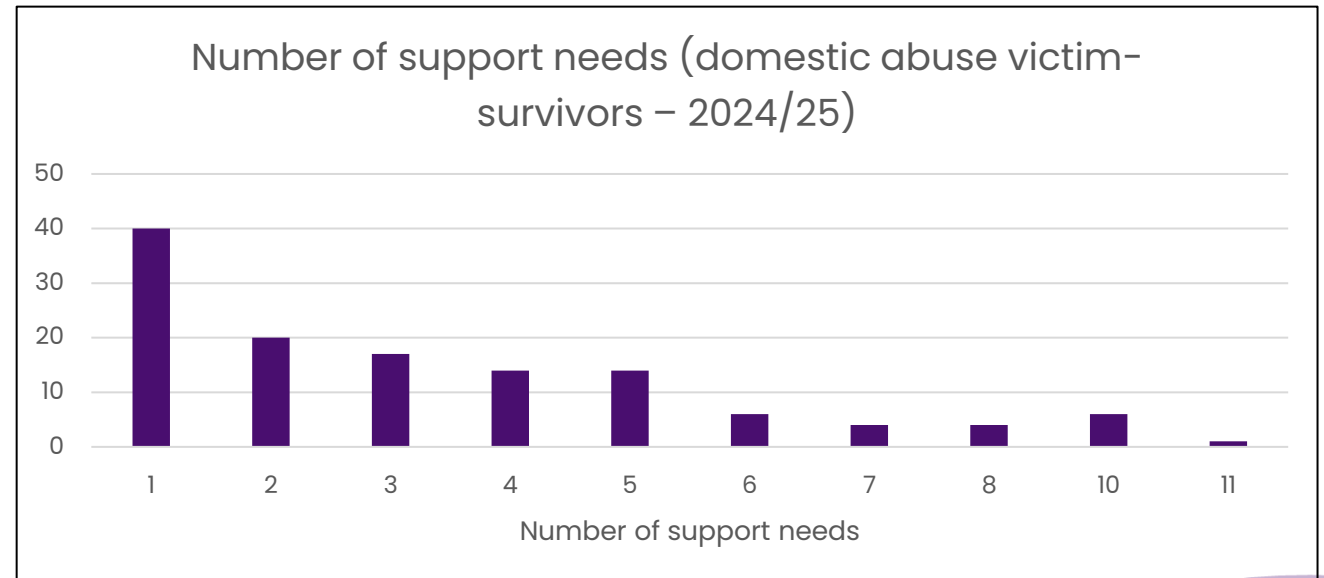
Support Need	Count With Need	With Relief Duty
History of mental health problems	46	28
Physical ill health & disability	31	19
Access to education, employment or training	17	7
At risk of / has experienced abuse (non-domestic)	16	10
History of rough sleeping	14	8
At risk of / has experienced sexual abuse	11	9
Offending history	11	8
Care leaver aged 18–20	10	6
Drug dependency needs	10	5
Alcohol dependency needs	10	6
History of repeat homelessness	10	8
Young person aged 18–25	9	4
Learning disability	7	6
Difficulties budgeting	6	3
Former asylum seeker	3	3
Victim of modern slavery	1	1
Care leaver 21–24	1	1
Care leaver 25+	1	1

Commentary

This table sets out all of the support need types recorded at assessment stage for victim-survivors of domestic abuse.

A substantial proportion (43%) of this group have a history of mental health problems.

The chart below highlights the complexity of need among this group. 46% of domestic abuse cases had 3 or more support needs.



Source: Cambridge City Council, Statutory Case Management Data

Pathway 2 – perpetrators of domestic abuse

Prevention and relief activity

	Perpetrator – prevention	Perpetrator – relief
2021	4	4
2022	2	15
2023	1	9
2024	0	4

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Implications

There are so few people on this specific pathway that we can not draw any meaningful inferences from the data.

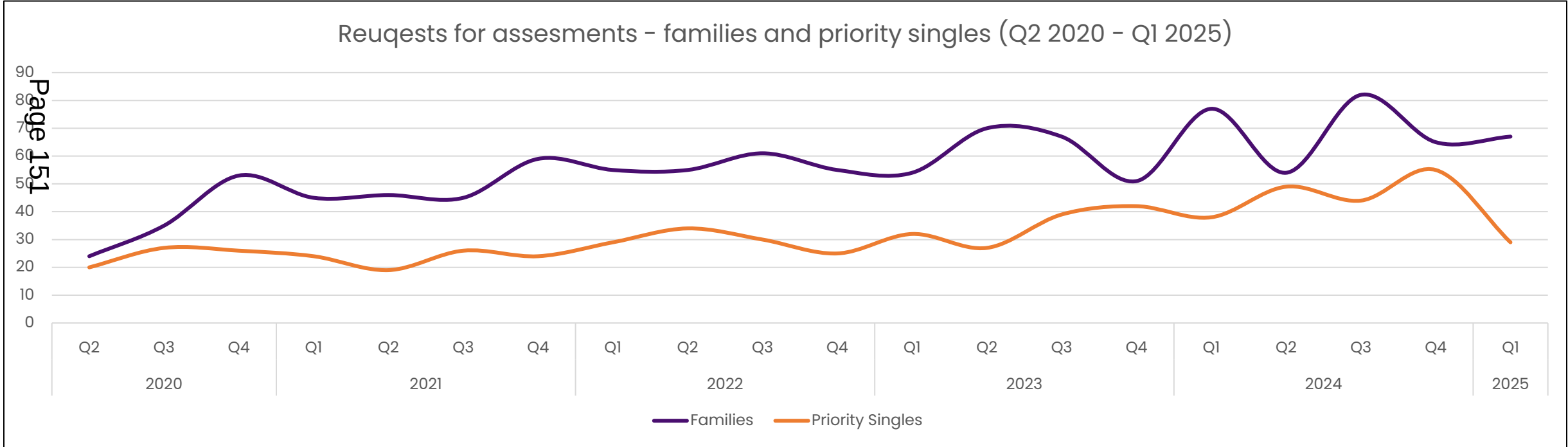
Alleged perpetrators are most likely to withdraw their application prior to accommodation being awarded.

This reinforces some of our findings from the service mapping exercise. There are no specific services or pathways for this group and almost all withdraw their application prior to completion. This evidences a need to shift the burden of moving away from victim-survivors and onto the person causing harm. This would require more formalised perpetrator housing support pathways to keep victims safe and prevent further abuse.

Pathway 3 – requests for assessments

Families and single households with a priority need*

In 2024/25 a total of 267 families requested an assessment, an increase of over 70% compared to 2020/21. Over the same period requests from priority singles increased by 84% to 177. In the following slides we set out how outcomes and needs have shifted over time.

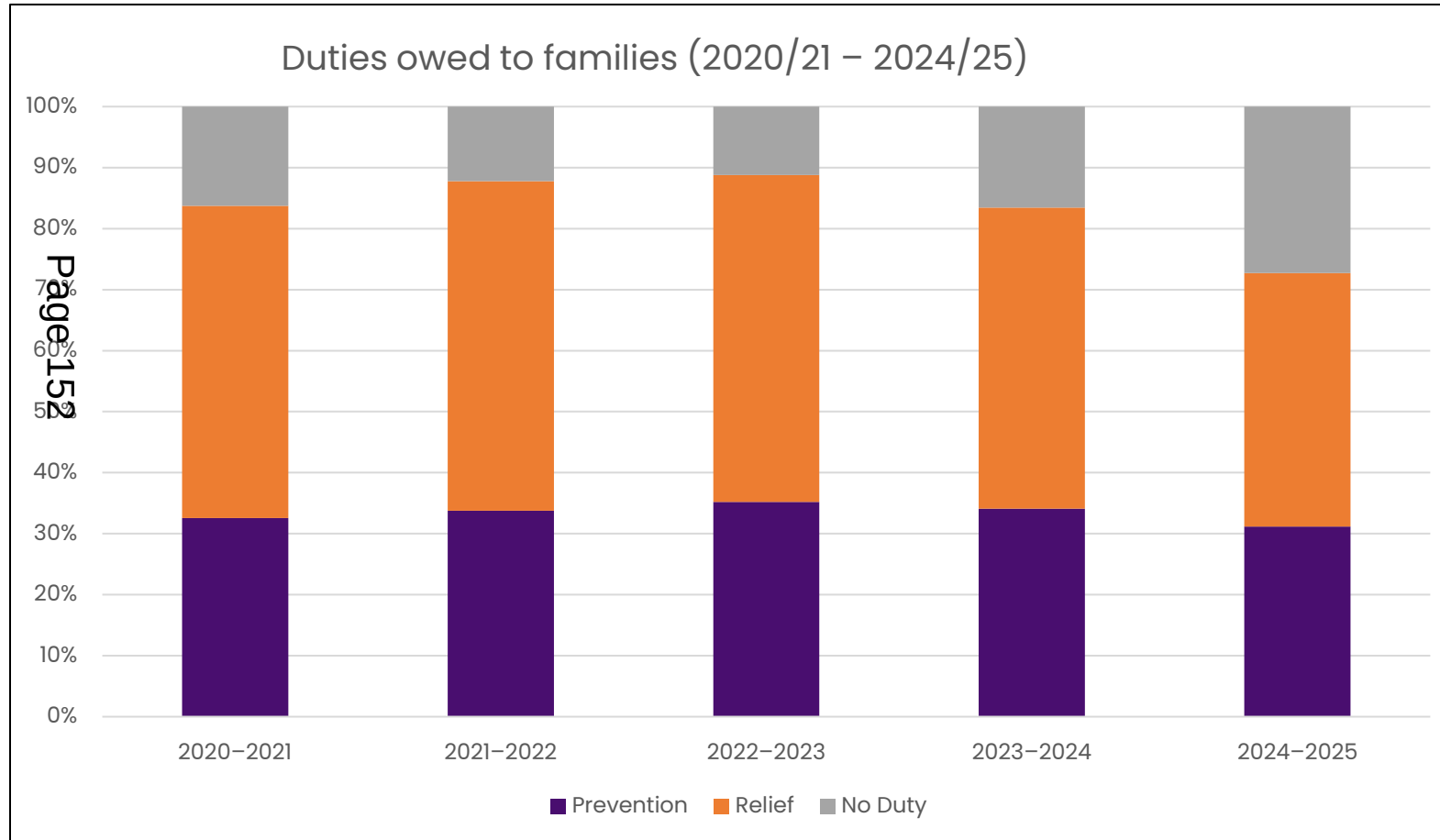


Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

*measured as singles entering TA in year

Pathway 3 – duties owed (families)

In recent years the proportion of families found to be owed “no duty” has increased



Source: Cambridge City Council, Statutory Case Management Data

Commentary

The chart highlights how the proportion of families owed no duty has increased in recent years, while relief duties have declined. There are a number of potential drivers for this trend.

Firstly, we have seen an increase in provision of information and advice at an earlier stage, which may reflect some external factors like:

- early-stage housing stress
- affordability issues
- overcrowding
- relationship breakdown risk

While the drivers of this may be negative, it could reflect a positive shift to earlier intervention.

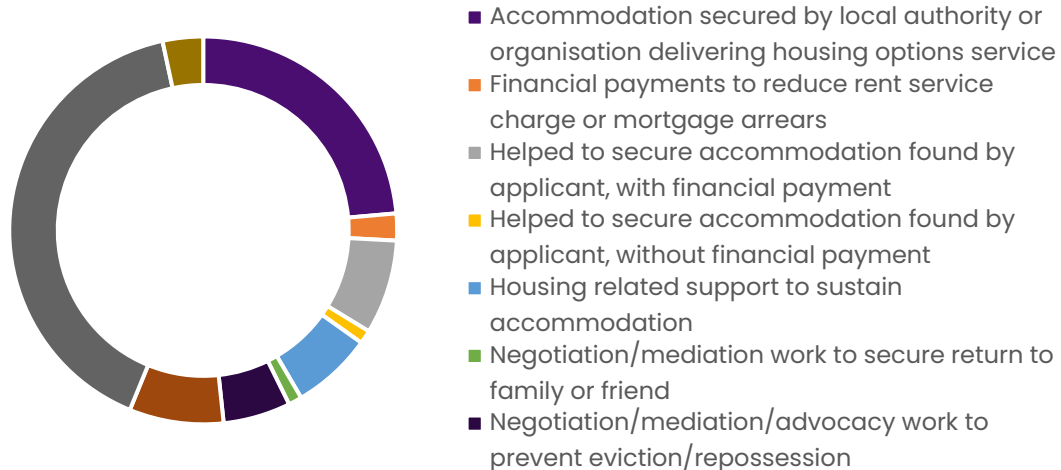
However, this may also reflect a stricter application of eligibility thresholds, driven by very high demand and overstretched temporary accommodation capacity.

Pathway 3 – prevention and relief activities (families)

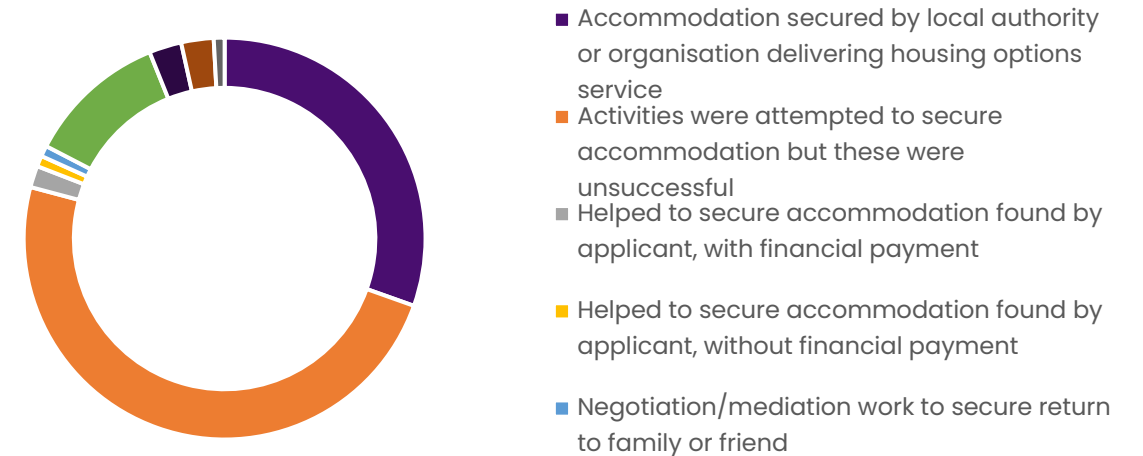
A high proportion of prevention and relief activities were unsuccessful for families in 2024/25. 40% of cases at prevention saw attempts made to secure accommodation but were unsuccessful – the equivalent figure for relief activities was 49%. The council was successful in supporting families to find accommodation in 24% of prevention cases and 30% of relief activities. This reflects some of the substantial and systemic challenges in the social, supported and private housing sectors.

Families - prevention activities – 2024/25 (n = 87)

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Families - relief activity – 2024/25 (N = 115)



Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Pathway 3 – prevention and relief outcomes (families)

	Reason for end – prevention duty
56 days or more expired and no further action	5
Homeless	37
No longer eligible	1
Refused suitable accommodation	1
Refused to cooperate	1
Secured alternative accommodation for 12 or more months	21
Secured alternative accommodation for 6 months	6
Secured existing accommodation for 12 or more months	7
Secured existing accommodation for 6 months	3
Withdrew application	5

	Accommodation outcome – prevention
Council tenancy	13
No fixed abode: not rough sleeping	1
Not Known	1
Other	3
Private rented sector: self-contained	14
Refuge	1
Registered Provider tenancy	6
Social rented supported housing or hostel	5
Staying with family	3
Temporary accommodation own arrangement	3
Temporary accommodation provided by local authority	23

	Reason for end of relief duty
56 days elapsed	61
Applicant has refused a suitable offer, which was not a final offer	1
Contact lost	3
Intentionally homeless from accommodation provided	1
Local connection referral accepted by other LA	6
Refused final accommodation or final part six offer	1
Secured accommodation for 12 months	25
Secured accommodation for 6 months	9
Withdrew application	8

	Accommodation outcome – relief
Council tenancy	18
No fixed abode: not rough sleeping	3
Not known	6
Other	2
Private rented sector: self-contained	3
Refuge	7
Registered Provider tenancy	9
Social rented supported housing or hostel	2
Staying with friends	1
Temporary accommodation own arrangement	3
Temporary accommodation provided by local authority	49

Pathway 3 – routes to accommodation (families)

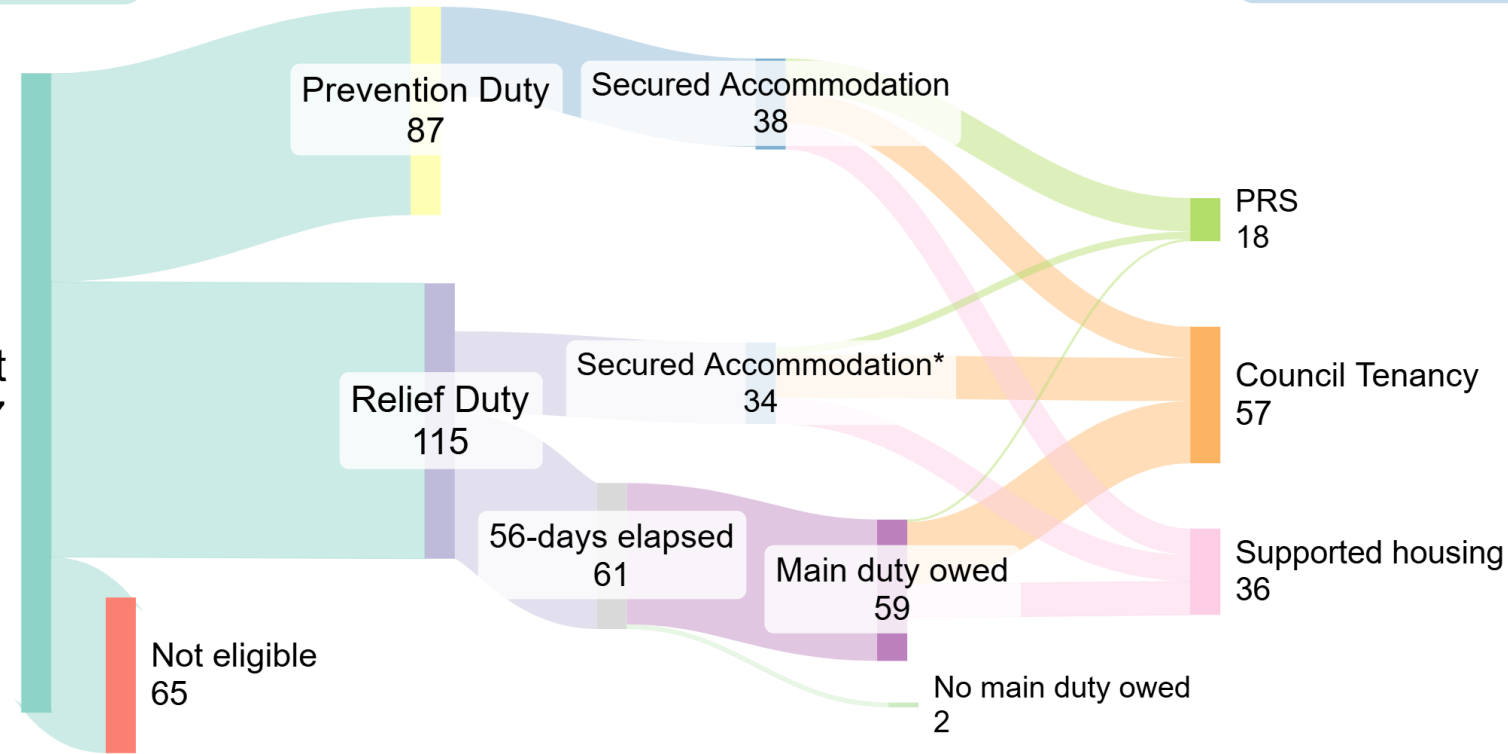
Families (2024/25) – pathways to secure accommodation

43% of families were assessed as being owed a relief duty in 2024/25.

Less than half of Prevention Duties resulted in accommodation being secured.

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Assessment
267



30% of people owed a relief duty secured accommodation within 56-days. 53% were owed a Main Duty after 56-days.

A council tenancy was the most common type of accommodation for people to secure. Just 17% were placed in PRs.

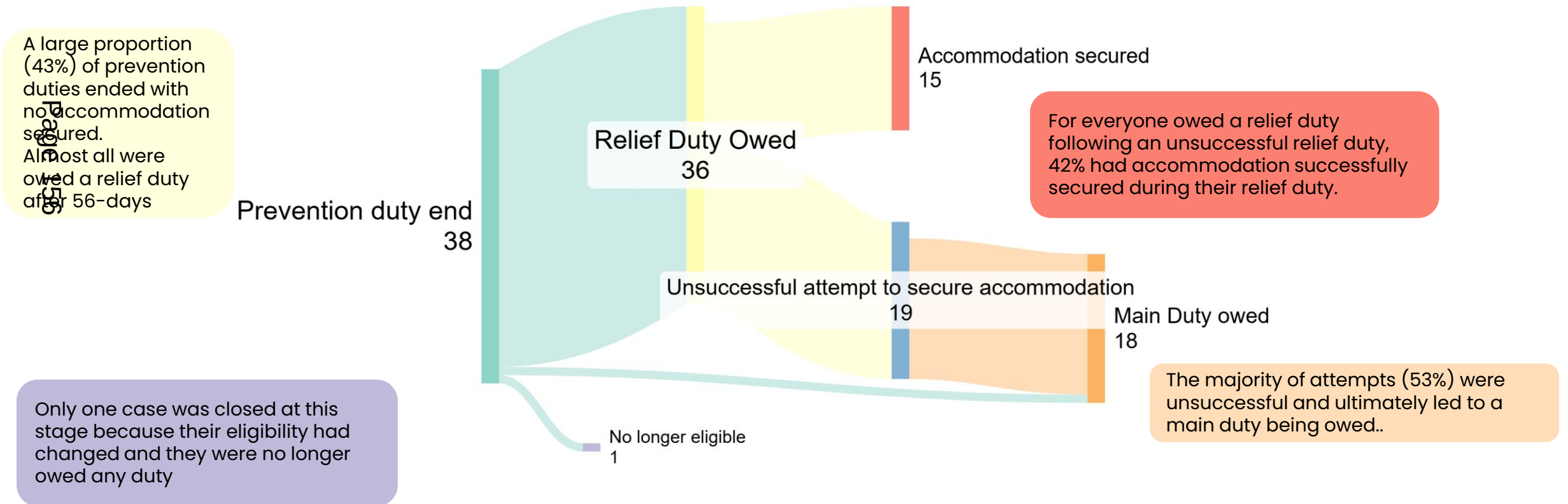
Around one quarter (24%) of families assessed were not owed any duty.

Source: Cambridge City Council, Statutory Case Management Data (Q2 2020 – Q1 2025)

Pathway 3 – unsuccessful prevention outcomes (families)

Families with an “unsuccessful” prevention duty outcome in 2024/25

This diagram shows the outcomes for Families who were owed a prevention duty but attempts to secure accommodation were unsuccessful.

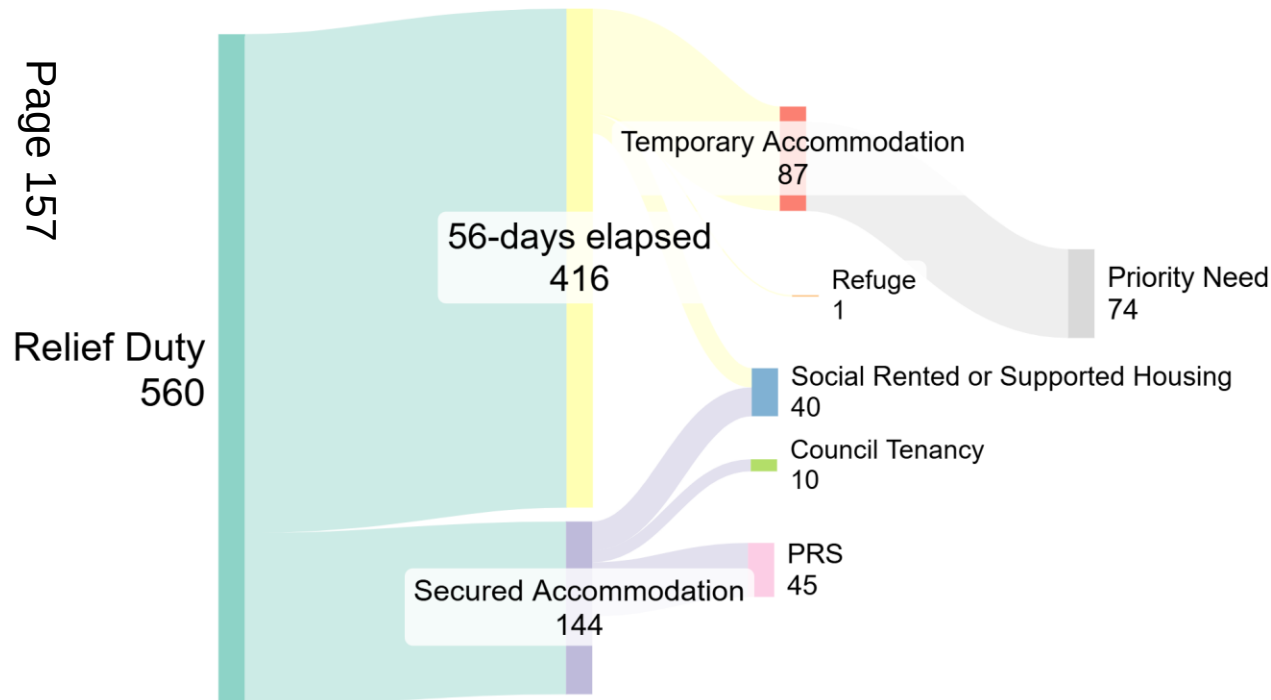


Pathway 3 – routes to accommodation (priority singles)

Priority singles – starting from Relief Duty being owed

560 single households were owed a Relief Duty in 2024/25. Of these,;

- 516 (74%) Relief Duties ended with 56-days having elapsed.
- Of these, 87 (20%) were provided with Temporary Accommodation.
- Of these, 74 (85%) were found to have a priority need.



Reason for priority need

74 Single Households were found to have a priority need at relief stage – an additional 23 came via prevention. The most common reason for single household being in priority need was for physical disability or ill health. This is followed by domestic abuse.

Reason for priority need (2024/25)	Single Person
Household includes a pregnant woman	1
Drug dependency	1
Old age	2
Learning difficulty	3
Care leaver and aged 18 to 20 years	6
Violence / threat of violence (not domestic abuse)	6
Other special reason	7
Mental health problems	15
Fled domestic abuse	17
Physical disability / ill health	39

Pathway 3 – support needs (priority singles)

Support needs of priority singles varied substantially

NB – numbers here reflect individual cases, whereas previous page reflects cases so numbers do not match.

Priority singles reaching main housing duty in 2024/25 show extremely high and overlapping needs, with over three-quarters experiencing mental ill health, more than half having histories of rough sleeping or repeat homelessness; and nearly two-thirds affected by domestic abuse.

Support Need	Count of Priority Singles with Need	Support Need	Count of Priority Singles with Need
History of mental health problems	134	Learning disability	16
Physical ill health & disability	88	Young person (18–25) requiring support	15
At risk of / has experienced domestic abuse	69	Care leaver aged 18–20	8
History of repeat homelessness	55	Former asylum seeker	5
History of rough sleeping	53	Care leaver aged 21–24	5
Drug dependency	41	Victim of modern slavery	4
Offending history	35	Care leaver aged 25+	2
Access to education, employment or training	33	At risk of gang violence / exploitation	2
At risk of / has experienced abuse (non-domestic)	22	Vulnerable due to old age	2
Difficulties budgeting	22	Young parent	1
Alcohol dependency	20	Care leaver aged 21+	1
At risk of / has experienced sexual abuse	17		

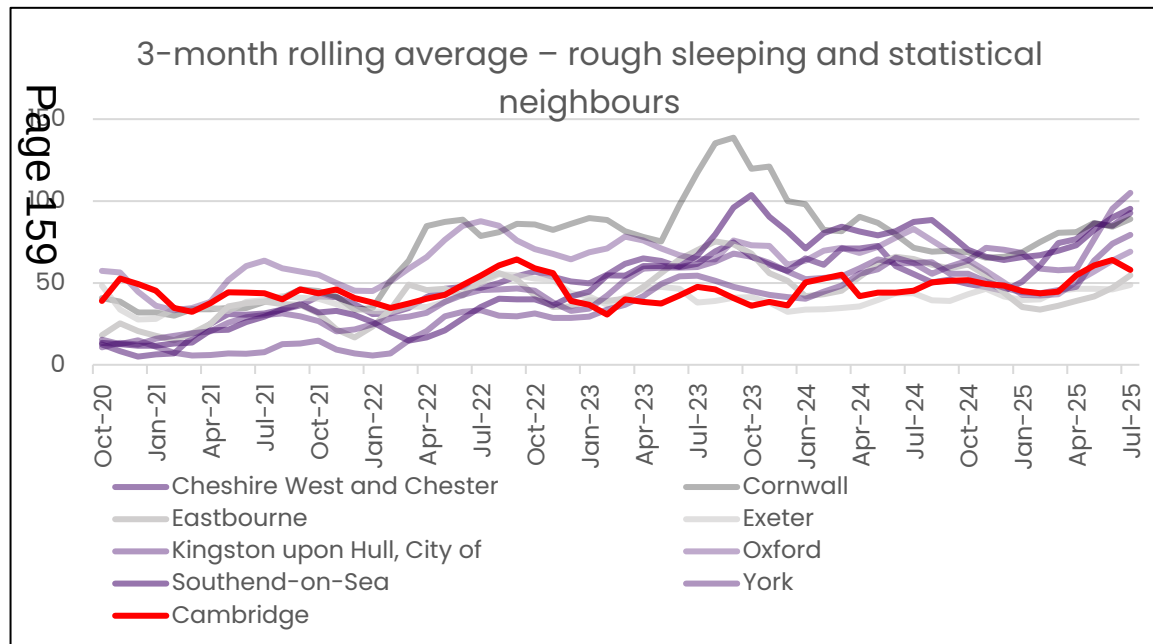
Source: Cambridge City Council, Statutory Case Management Data

Pathway 4 – drivers

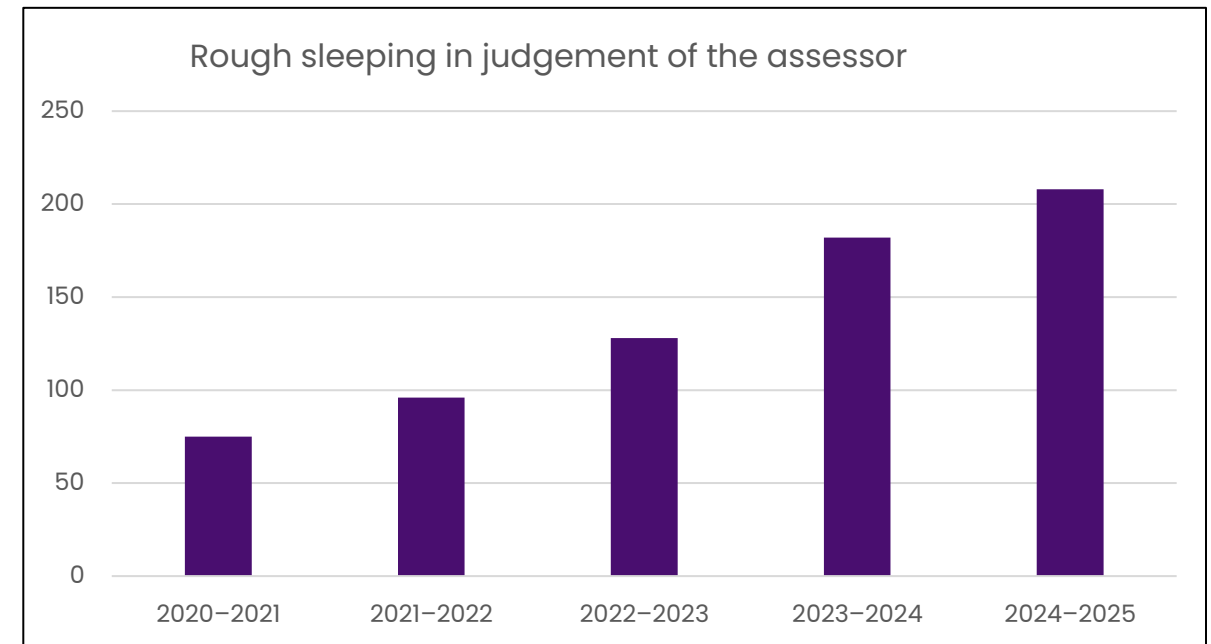
Rough sleeping prevalence and number of assessments

In June 2025 the rolling average number of people sleeping rough in Cambridge was just over 40 per month (Rough Sleeping Data Led Framework). H-CLIC data suggests that 70 people were rough sleeping in 2024/25 and were owed a relief duty – while Cambridge's Statutory Case Management data shows 99 people were rough sleeping in the judgement of the assessor, regardless of whether a duty was owed or completed.

The Rough Sleeping Data Led Framework shows that rough sleeping has remained relatively steady in Cambridge since 2020 – over the same period the number of assessments also remained steady, before increasing rapidly in 2024/25. This suggests that the City Council has improved its outreach and identification, rather than there having been a genuine increase in demand.



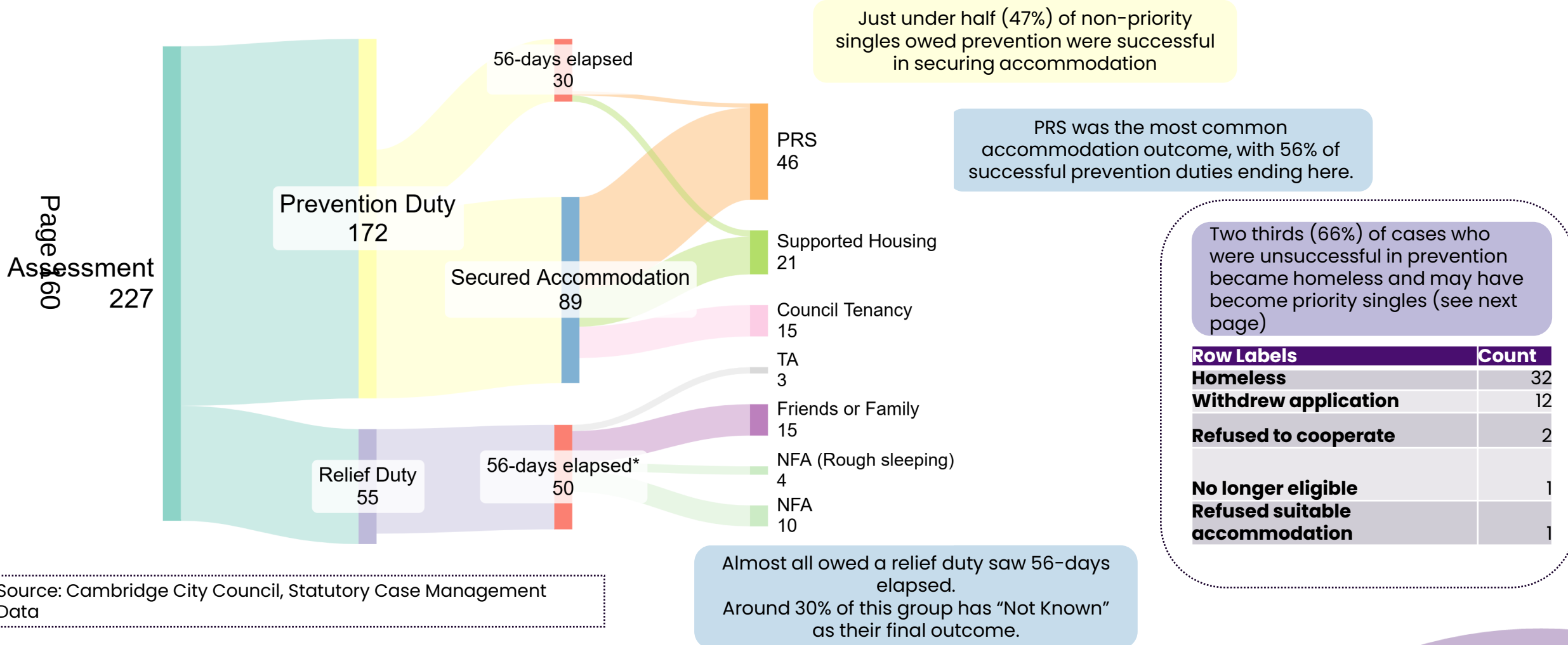
Source: MHCLG, Rough Sleeping Data Framework 2024/25



Source: Cambridge City Council, Statutory Case Management Data

Pathway 4 – outcomes

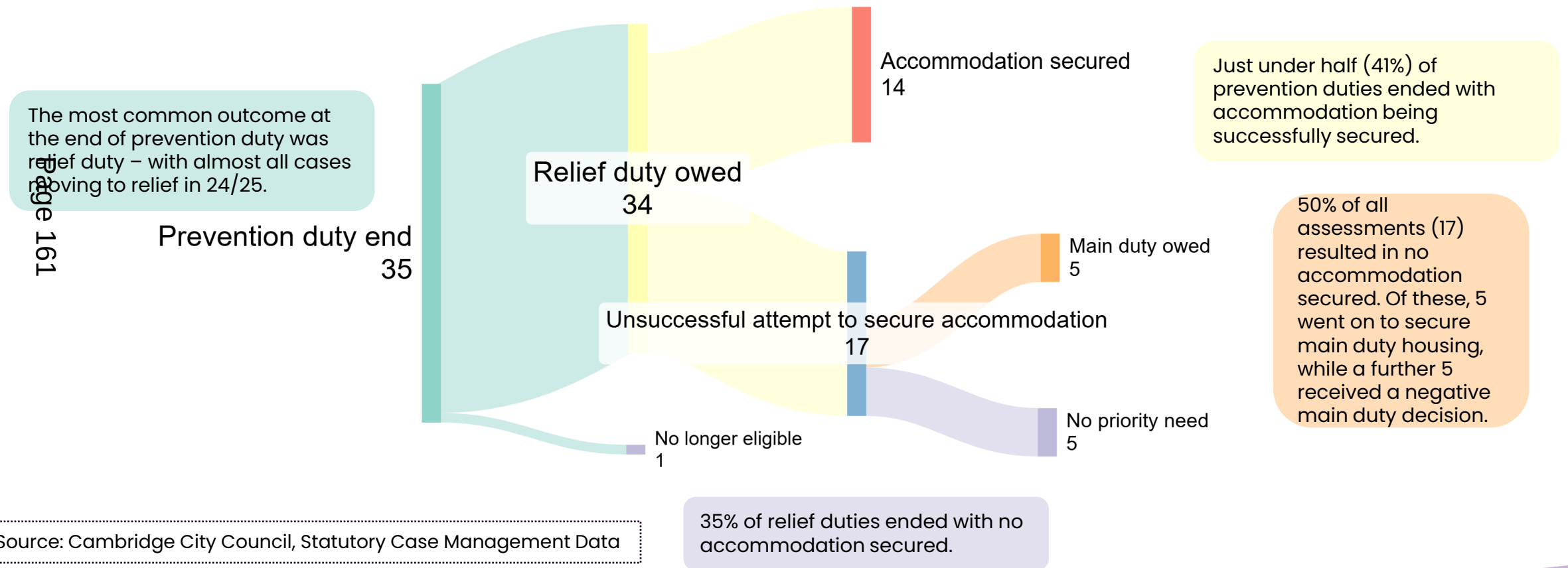
Complete pathways in 2024/25 – non-priority single households



Pathway 4 – outcomes

Non-priority single households (2024/25)

This diagram shows the outcomes of those non-priority singles who were unsuccessful in securing accommodation at prevention stage.

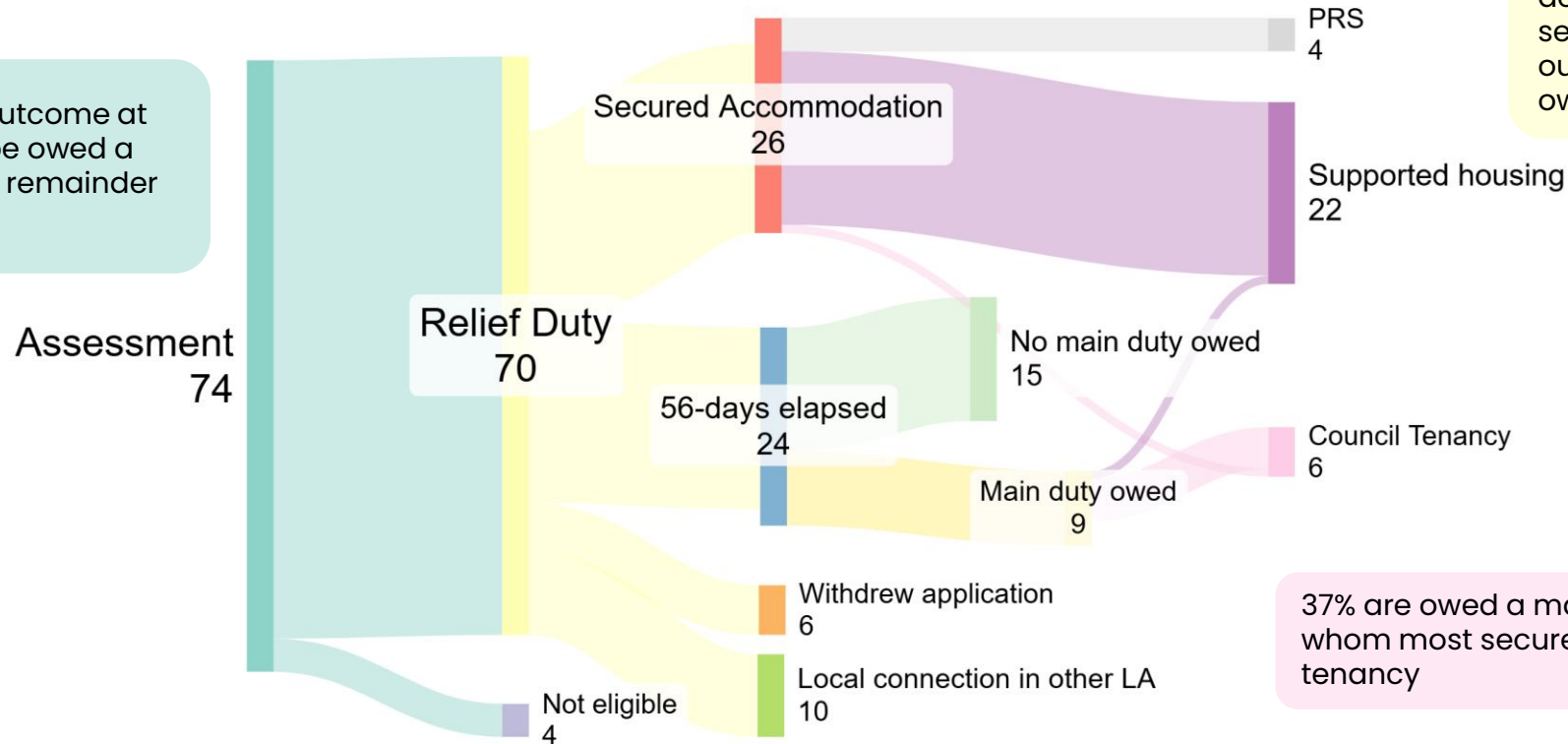


Pathway 4 – outcomes

Rough sleeper statutory homelessness pathways in 2024/25

The most common outcome at assessment was to be owed a relief duty (95%). The remainder were ineligible.

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35% of relief duties ended with accommodation being successfully secured – this is the most common outcome for rough sleepers found to be owed a relief duty.

34% of cases elapsed after 56 days – of these just over 60% are found to have no main duty owed.

37% are owed a main duty, of whom most secure a council tenancy

14% of relief duties were found to have no local connection

Source: Cambridge City Council, Statutory Case Management Data

Pathway 4 – outcomes

Rough sleepers – relief and accommodation outcomes

The **most common relief duty outcome for rough sleepers is an ‘unsuccessful’ one** (56 days elapsed, contact lost, intentionally homeless, refused accommodation). Of those who secure accommodation, the most **common outcome is social rented supported housing/hostels**, followed by temporary accommodation.

Relief – reason duty ended

	Reason for end – relief duty
56 days elapsed	22
Applicant has refused a suitable offer, which was not a final offer	1
Contact lost	3
Intentionally homeless from accommodation provided	1
Local connection referral accepted by other LA	10
Refused final accommodation or final part six offer	1
Secured accommodation for 12 months	5
Secured accommodation for 6 months	18
Withdrew application	6

Relief – accommodation outcome

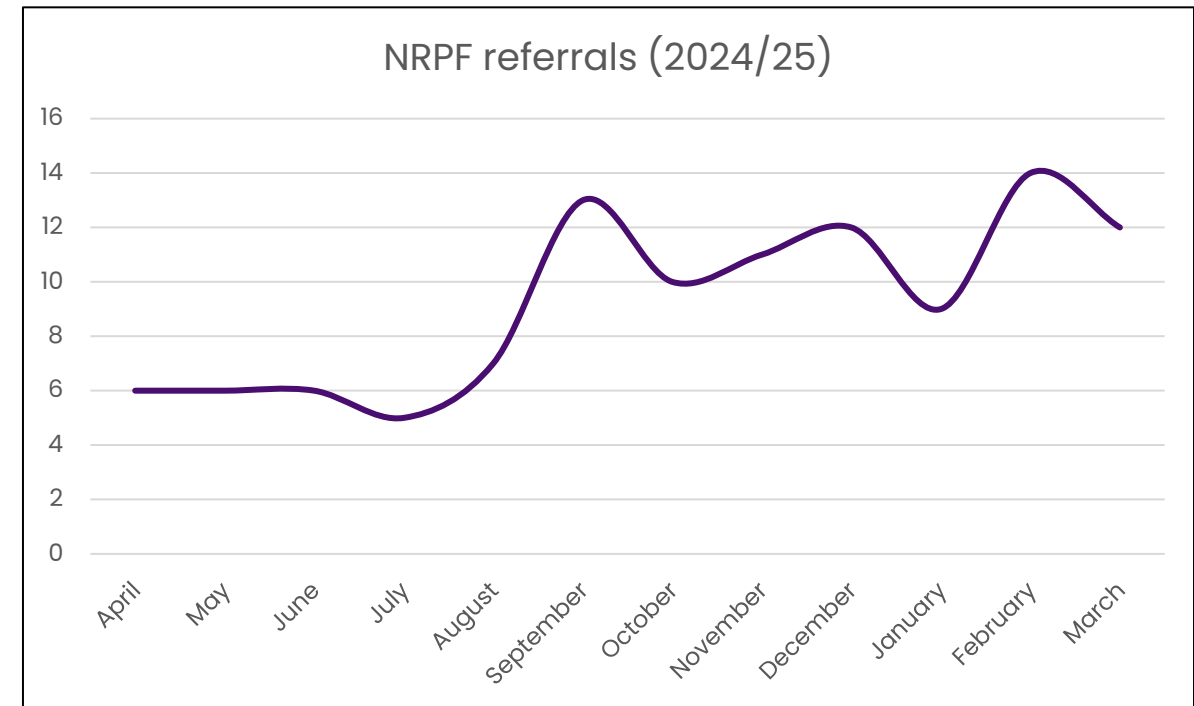
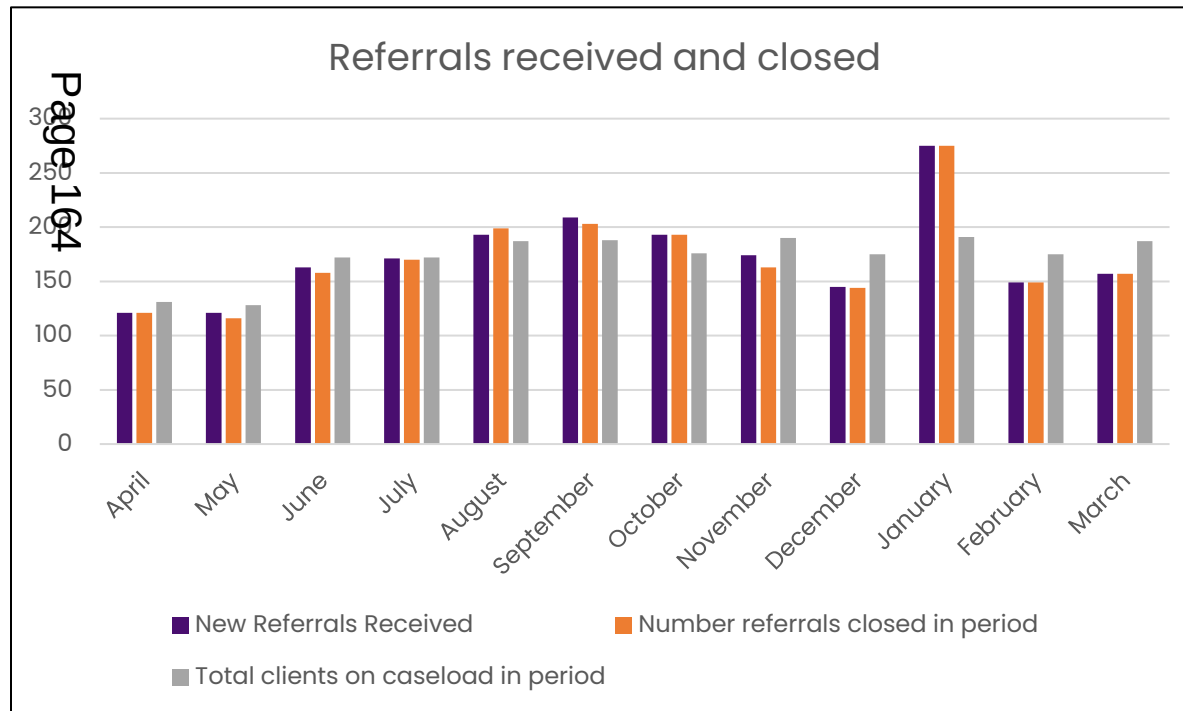
	Accommodation outcome
Council tenancy	1
Custody	1
No fixed abode: not rough sleeping	2
No fixed abode: rough sleeping	8
Not known	5
Other	3
Private rented sector: HMO	4
Social rented supported housing or hostel	21
Staying with family	1
Staying with friends	4
Temporary accommodation provided by local authority	8

Pathway 5 – drivers

There is very limited data on households with No Recourse to Public Funds

The City's outreach service is the only source of data on this cohort.

The service received 1,954 referrals over the course of the year – note these are not individual referrals and the data will include cases that have been referred multiple times over the year. **A small proportion (6%) were recorded as NRPF.**

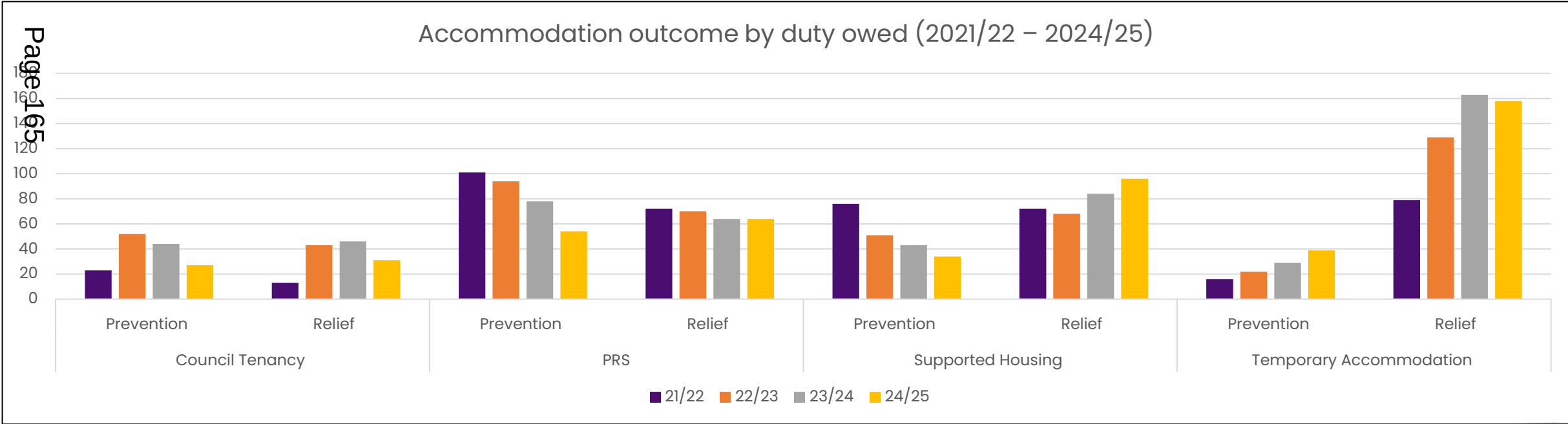


Settled accommodation setting – by duty

The types of settled accommodation secured has shifted over recent years

This chart highlights some of the changing patterns in accommodation outcomes over the last four years in Cambridge.

- **Council Tenancy** – has become the least common outcome at prevention and relief phase.
 - **PRS** – has declined sharply at prevention stage, whilst declining at a far slower rate for relief duties.
- **Supported Housing** – supported housing has declined sharply as an outcome at prevention, though is offset by an increase at relief.
 - **Temporary Accommodation** – placements have increased rapidly at relief phase. A slower rate of increase has been seen at prevention duty.



Source: Cambridge City Council, Statutory Case Management Data

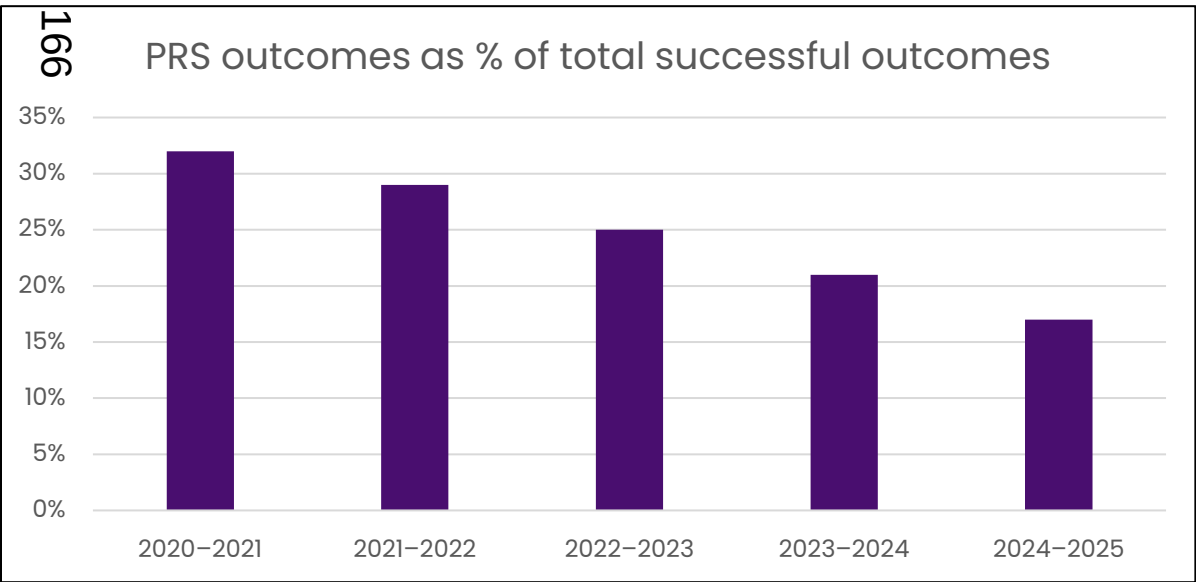
Private rented sector

The PRS is declining as a route out of homelessness and is driving new demand

The charts below highlight concerning trends relating to the PRS as a driver of homelessness and as a route out of homelessness.

1. The bar chart to the left highlights how PRS has declined in relative terms as a route out of homelessness. In 2020/21 the PRS accounted for nearly one third (32%) of all successful accommodation outcomes. By 2024/25 this had declined by 15%-points and stood at 17%.
2. The table shows how the PRS has become a net driver of homelessness. It now accounts for more losses of accommodation than it does successful placements – a reversal of the distribution seen in 2020.

Taken together and in the context of some of the PRS market information, this points toward the PRS as a major challenge and risk factor within the local system.



	PRS losses (into homelessness)	PRS outcomes (exit to PRS)	Net PRS gap
2020-2021	86	159	-73
2021-2022	134	173	-39
2022-2023	190	164	26
2023-2024	230	142	88
2024-2025	225	118	107

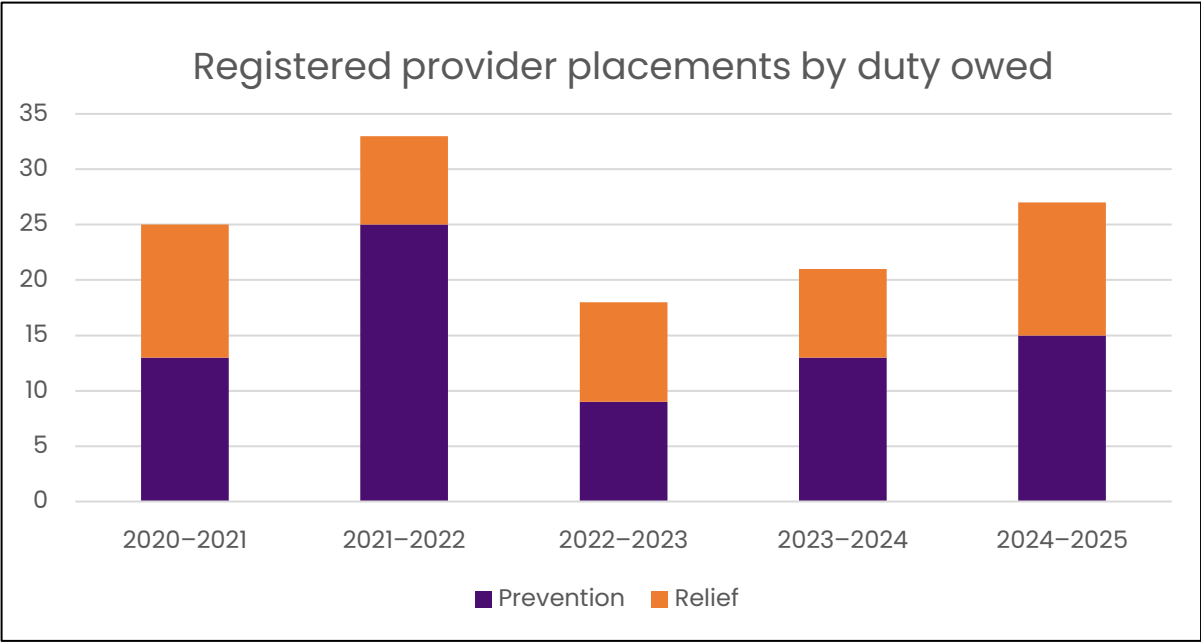
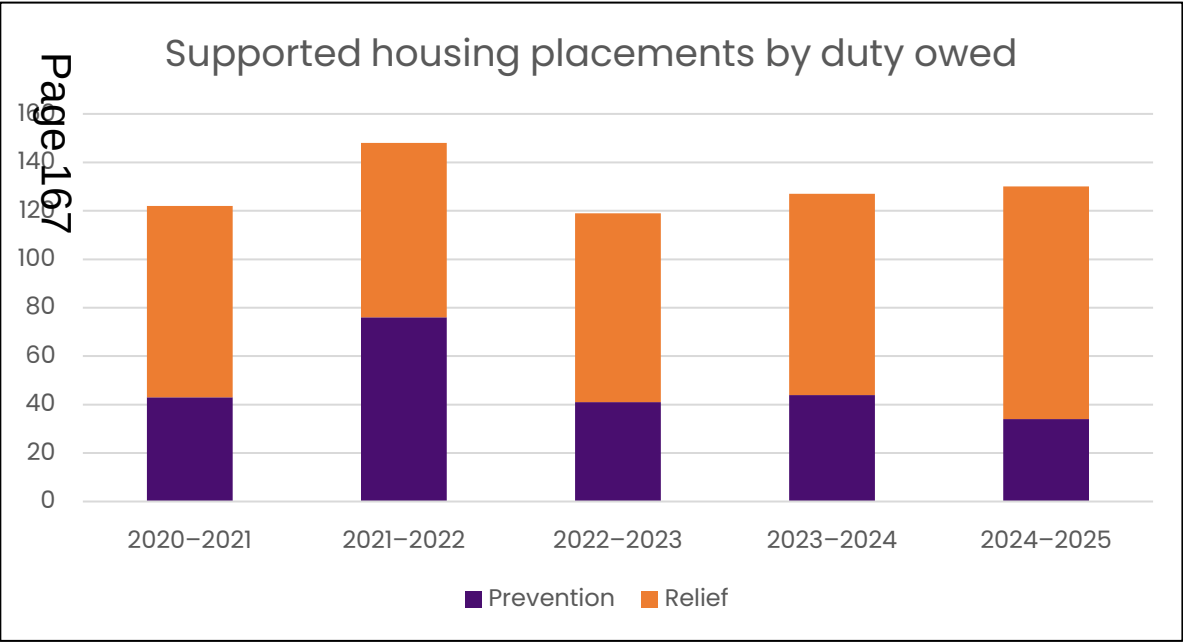
Source: Cambridge City Council, Statutory Case Management Data

Supported housing & social housing (RPs)

Placements have fluctuated and there has been a shift toward placements being made at relief

In 2024/25 a total of 130 people were placed in supported housing in Cambridge. The majority (74%) of placements were made at relief stage. 27 people were secured settled social tenancies.

There has been minimal variation in the total number of supported housing placements made – given closures of several schemes across the city, this reflects a good level of resilience within the sector. However, there has been a clear shift of placements being made at prevention phase to relief. This is likely linked to challenges with capacity and sufficiency within the sector.



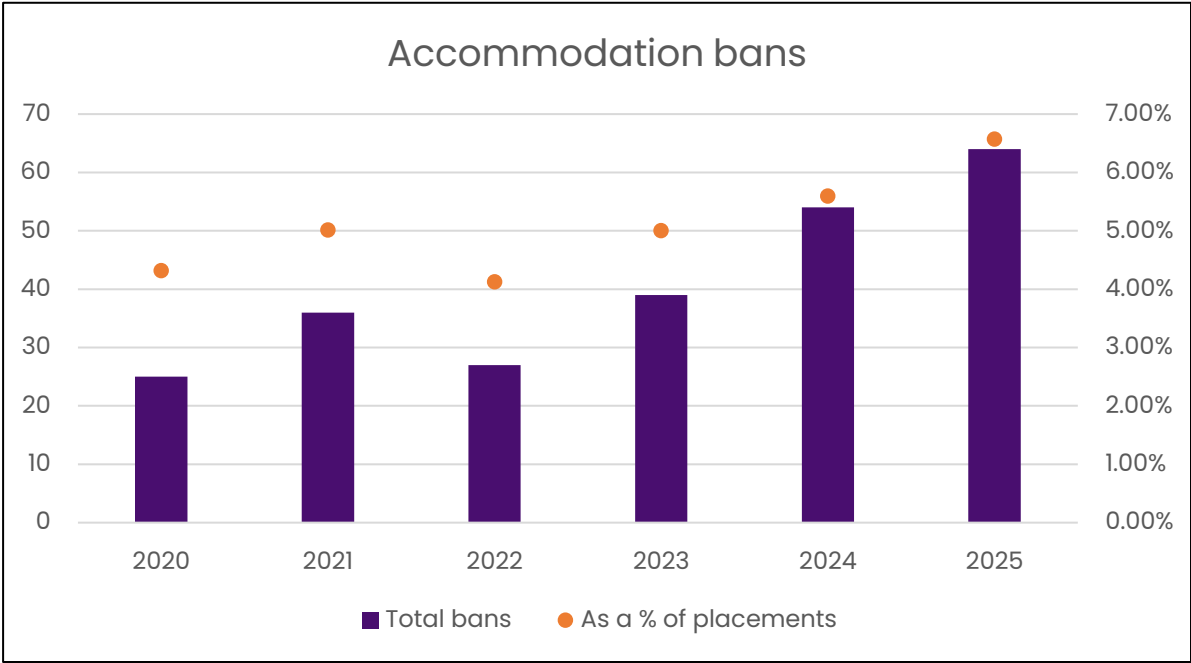
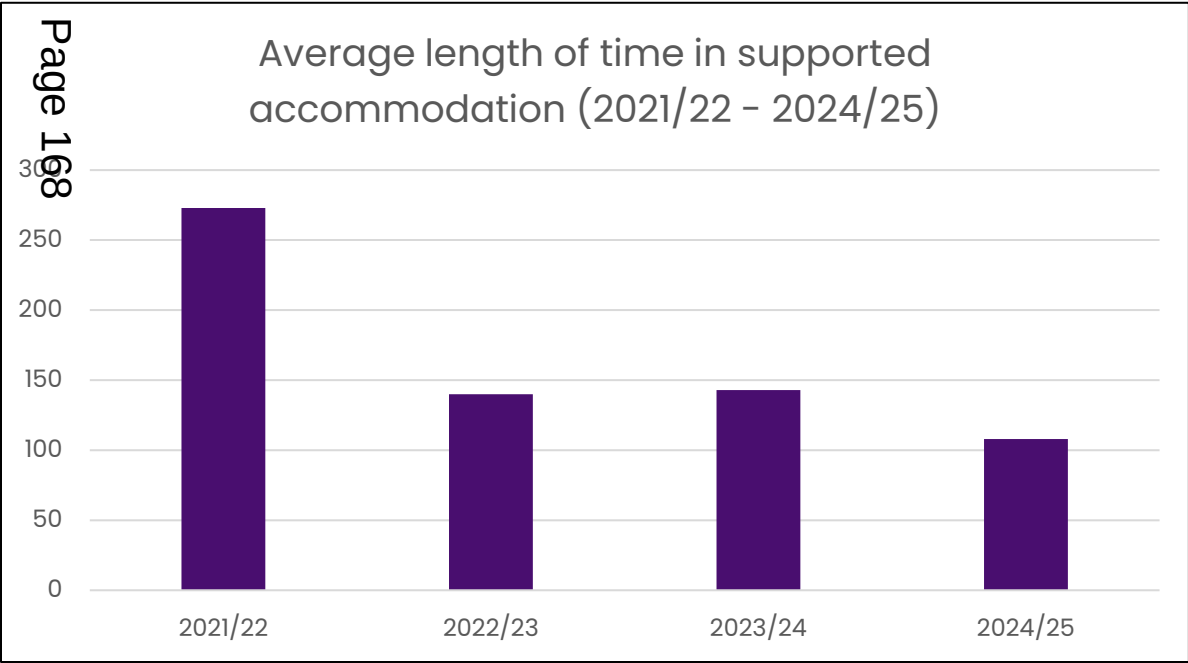
Source: Cambridge City Council, Statutory Case Management Data

Supported housing – length of stay and active bans

Proportion of people with active bans has grown while average length of stay has decreased.

Over the last three financial years, the average length of time spent in supported accommodation across Cambridge has remained steady, following a substantial drop after 2021/22. This is reflected in the placement data set out on the previous page – as placements have flatlined so to has length of stay; highlighting that turnover rates are likely at an equilibrium point.

We have seen a substantial increase in accommodation bans over the last six years. Perhaps reflecting that acuity or complexity of need has increased and providers are struggling to manage a greater number of individuals that their services are not designed to support.



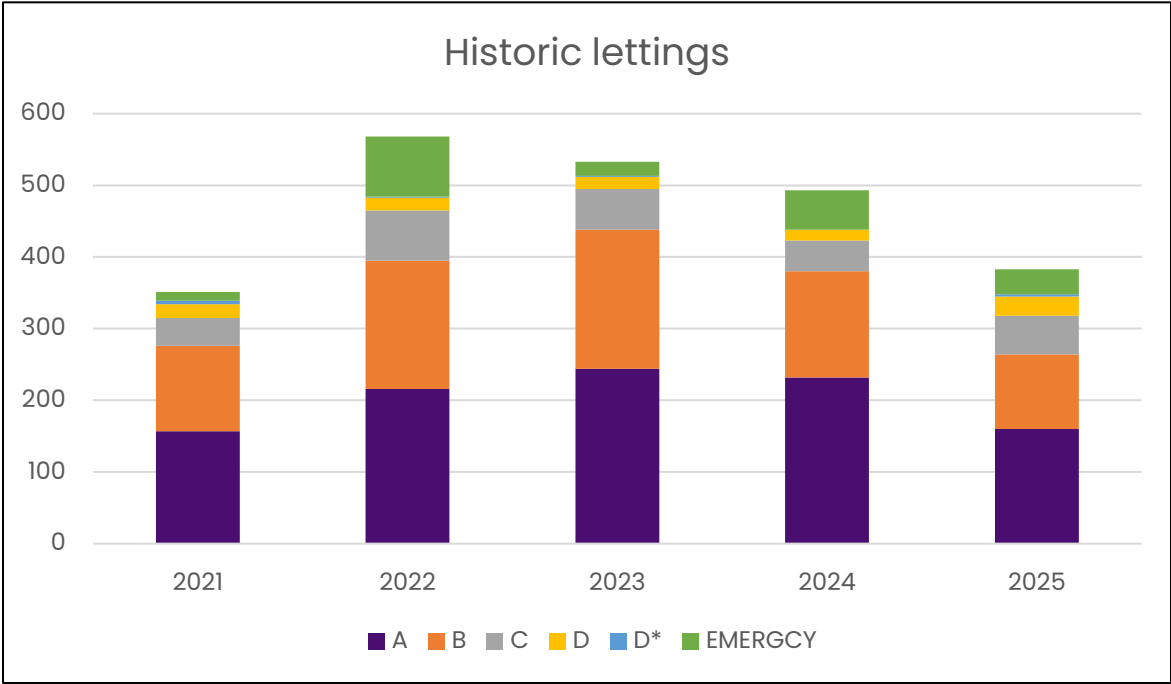
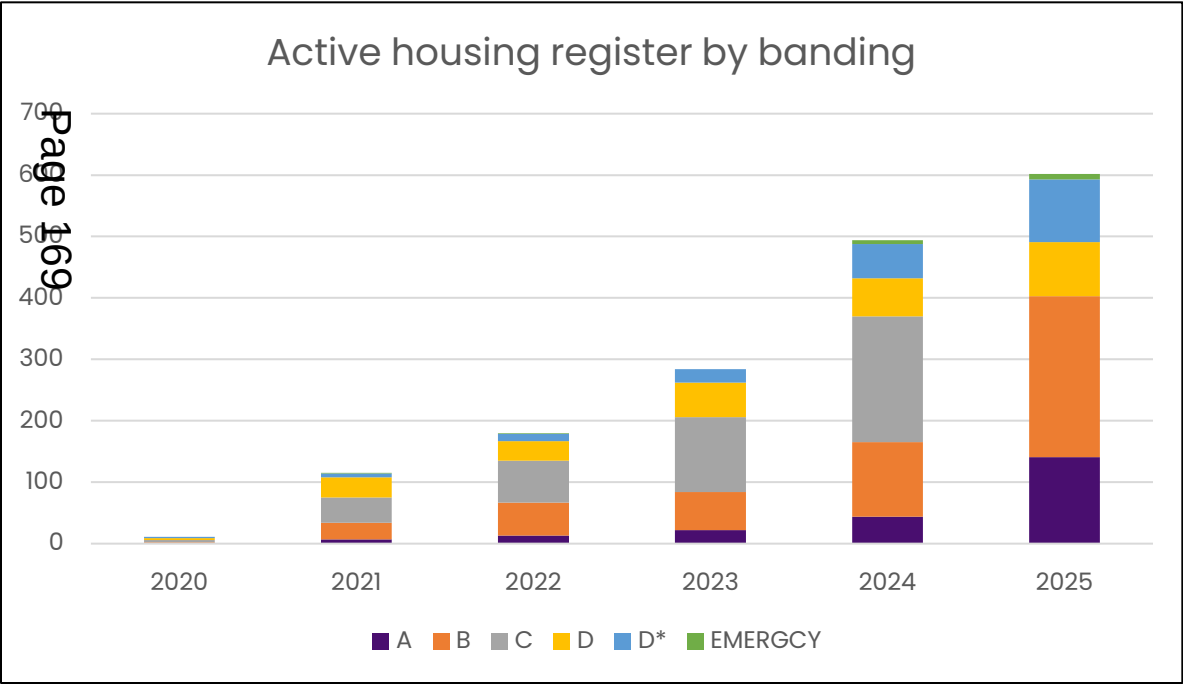
Source: InForm

Current housing register by banding

The housing register has grown rapidly with more people allocated to higher bandings

In October 2025 there were 2,013 people on the active housing register. Just over 15% of people on the active housing register are Band A.

The historic lettings data highlights how a key driver for the increase in the active housing register is a declining lettings rate. In the last complete year, 493 households received a social letting, most (47%) were Band A.



Source: Cambridge City Council, Active Housing Register and Historic Lettings

Reasons why banding was allocated

There have been some substantial changes in reasons for banding being allocated.

Homelessness has increased rapidly as a reason for banding allocations, both in relative and absolute terms. Homelessness now accounts for a quarter (24%) of all banding decisions.

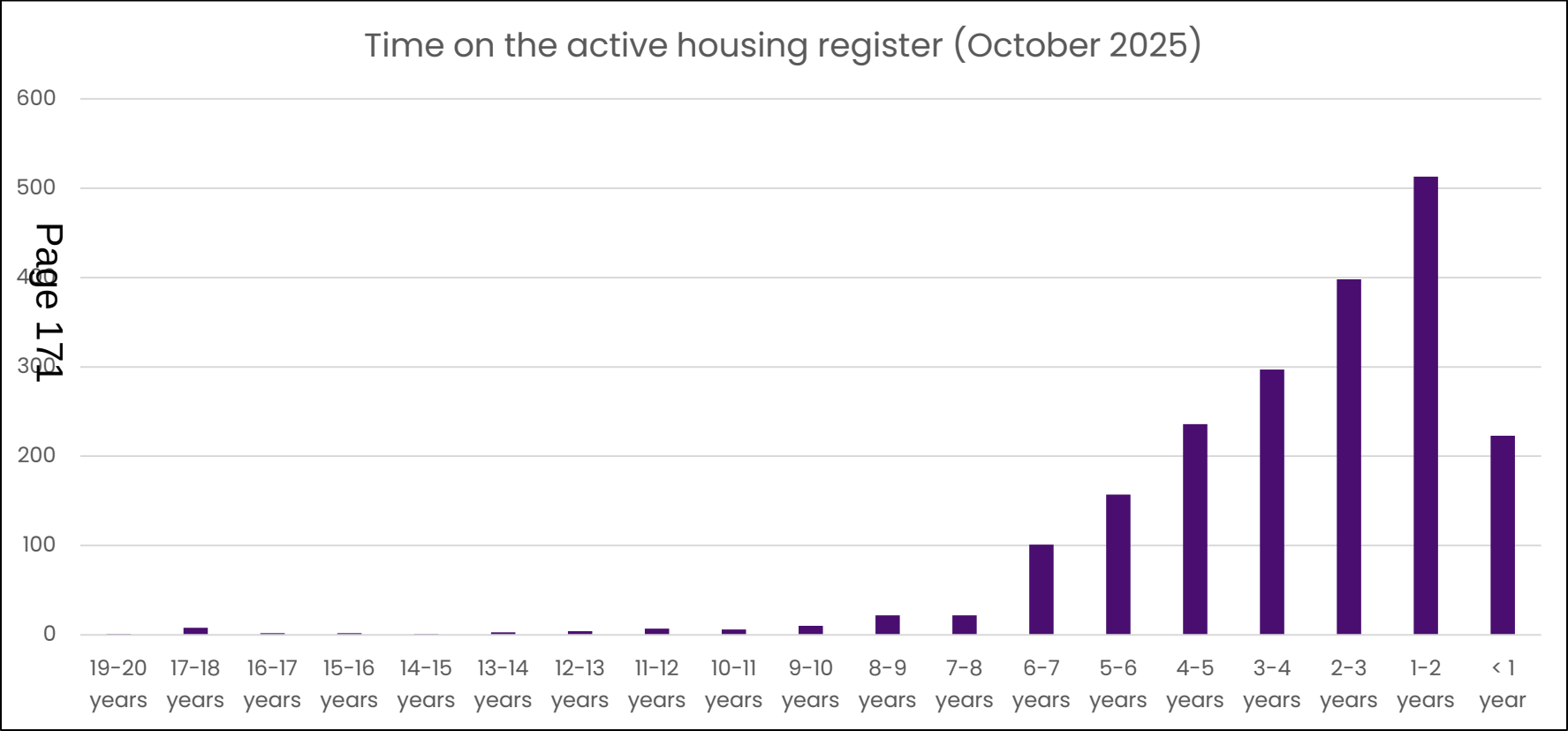
	2019	2020	2021	2022	2023	2024
Current supported housing resident	2	26	26	18	30	37
Emergency	4	13	34	79	13	69
Financial Resources		4	1	3		1
Health and Safety risk		2	4			
Homeless households	1	28	65	108	120	97
Housing conditions	21	23	26	26	14	4
Lacking one bedroom	26	56	53	85	67	31
Lacking two or more bedrooms	5	16	9	10	10	2
Low Housing Need	7	8	23	15	16	17
Medical Need	20	34	53	61	59	34
Multiple needs	1	1	3	4	5	3
Need to move for social reasons	6	5	12	10	8	5
Other homelessness	5	2	8	2	2	1
Owed a prevention or relief duty		7	24	34	45	39
Reasonable preference but no connection to local area			3		1	
Sleeping rough		3	3			1
Under-occupancy by one bedroom	3	6	12	9	3	5
Under-occupancy by two or more bedrooms or release of adapted property	3	2	9	6	7	5
Urgent multiple needs	7	22	43	83	66	37
Urgent Transfer	1	5	8	2	3	1
Victims of harassment, violence or abuse	6	8	12	11	12	6
TOTAL	118	271	431	566	481	395

	2019	2020	2021	2022	2023	2024
Current supported housing resident	1.69%	9.59%	6.03%	3.18%	6.24%	9.37%
Emergency	3.39%	4.80%	7.89%	13.96%	2.70%	17.47%
Financial Resources	0.00%	1.48%	0.23%	0.53%	0.00%	0.25%
Health and Safety risk	0.00%	0.74%	0.93%	0.00%	0.00%	0.00%
Homeless households	0.85%	10.33%	15.08%	19.08%	24.95%	24.56%
Housing conditions	17.80%	8.49%	6.03%	4.59%	2.91%	1.01%
Lacking one bedroom	22.03%	20.66%	12.30%	15.02%	13.93%	7.85%
Lacking two or more bedrooms	4.24%	5.90%	2.09%	1.77%	2.08%	0.51%
Low Housing Need	5.93%	2.95%	5.34%	2.65%	3.33%	4.30%
Medical Need	16.95%	12.55%	12.30%	10.78%	12.27%	8.61%
Multiple needs	0.85%	0.37%	0.70%	0.71%	1.04%	0.76%
Need to move for social reasons	5.08%	1.85%	2.78%	1.77%	1.66%	1.27%
Other homelessness	4.24%	0.74%	1.86%	0.35%	0.42%	0.25%
Owed a prevention or relief duty	0.00%	2.58%	5.57%	6.01%	9.36%	9.87%
Reasonable preference but no connection to local area	0.00%	0.00%	0.70%	0.00%	0.21%	0.00%
Sleeping rough	0.00%	1.11%	0.70%	0.00%	0.00%	0.25%
Under-occupancy by one bedroom	2.54%	2.21%	2.78%	1.59%	0.62%	1.27%
Under-occupancy by two or more bedrooms or release of adapted property	2.54%	0.74%	2.09%	1.06%	1.46%	1.27%
Urgent multiple needs	5.93%	8.12%	9.98%	14.66%	13.72%	9.37%
Urgent Transfer	0.85%	1.85%	1.86%	0.35%	0.62%	0.25%
Victims of harassment, violence or abuse	5.08%	2.95%	2.78%	1.94%	2.49%	1.52%

Source: Cambridge City Council, Active Housing Register and Historic Lettings

Time spent on the register and average age

There are 2,013 people on the active housing register – nearly one quarter (24%) have been on the register for between 5 and 10 years. A small group (1.69%) have been on the active housing register for over a decade.



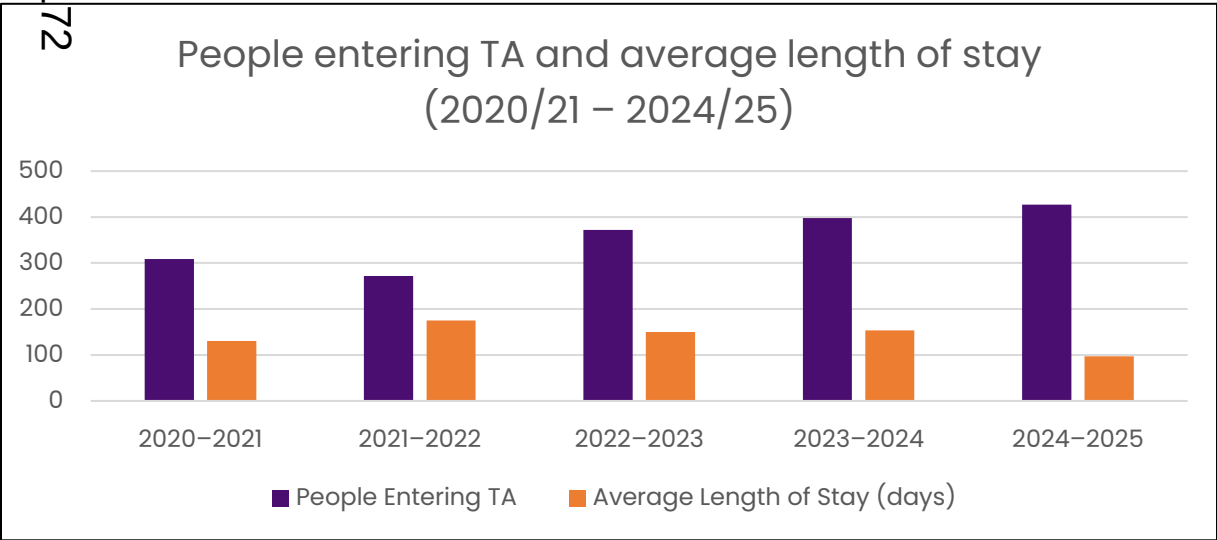
	Joined register	As a % of total
19-20 years	1	0.05%
17-18 years	8	0.40%
16-17 years	2	0.10%
15-16 years	2	0.10%
14-15 years	1	0.05%
13-14 years	3	0.15%
12-13 years	4	0.20%
11-12 years	7	0.35%
10-11 years	6	0.30%
9-10 years	10	0.50%
8-9 years	22	1.09%
7-8 years	22	1.09%
6-7 years	101	5.02%
5-6 years	157	7.80%
4-5 years	236	11.72%
3-4 years	297	14.75%
2-3 years	398	19.77%
1-2 years	513	25.48%
< 1 year	223	11.08%
Total	2013..	

Source: Cambridge City Council, Active Housing Register and Historic Lettings

Temporary accommodation placements

Changes in the number of households entering TA

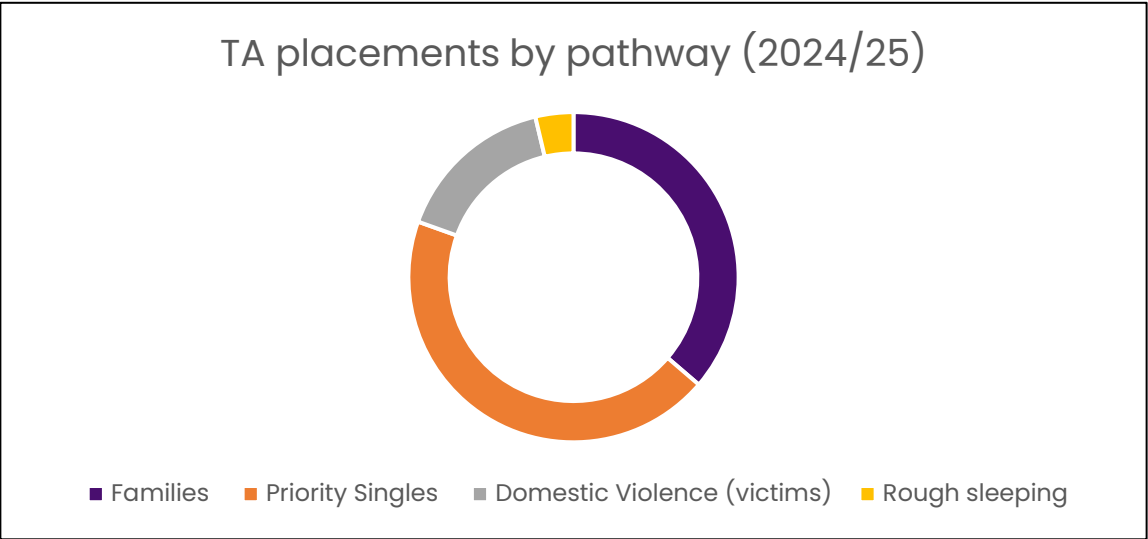
The chart below highlights two key trends in TA over the last five years. The number of people entering TA has increased at a steady rate, with placements increasing by 38% over this period. In the same period, the average length of stay declined at a similar rate. Average length of stay was 130 days in 2020/21 and 97 days in 2024/25 – a decrease of 34%. This highlights an increasing rate of churn in TA, reflecting rising demand and effective move-on processes. Priority Singles are the largest group in TA and account for 44% of all placements.



Source: Cambridge City Council, Statutory Case Management Data

TA placement by pathway and duty (2024/25)

	Prevention	Relief
Families	26	52
Priority Singles	0	95
Domestic Abuse (victim-survivors)	3	31
Rough sleeping	0	8

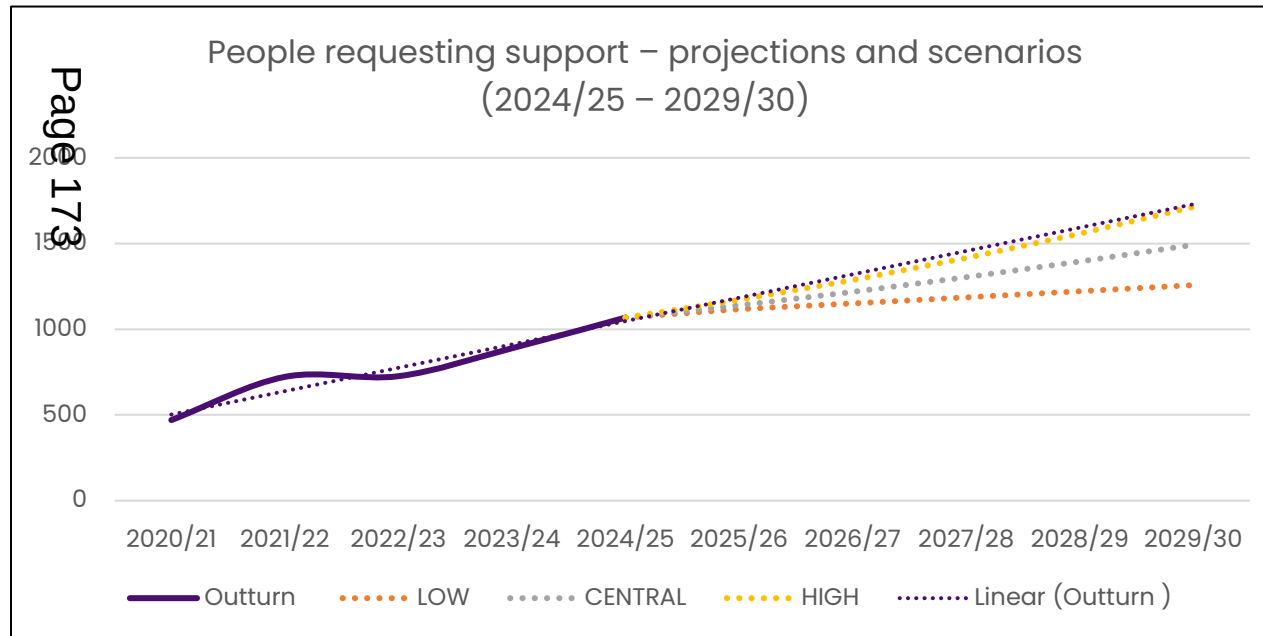


Projections – total demand and requests

Projecting future total demand for homelessness support

The available data shows that requests for support have increased by over 120% between 2020 and 2025. However, a monthly breakdown of the data shows that the rate of increase has slowed in the last nine months. As such, our central forecast is that total number of people requesting support will increase by around 7% per year, giving a compound increase of 40% over five years.

This is still a large increase in demand but at a slower rate compared to the previous five-years, highlighting the importance of developing strategic prevention work and growing capacity to meet needs across the city.



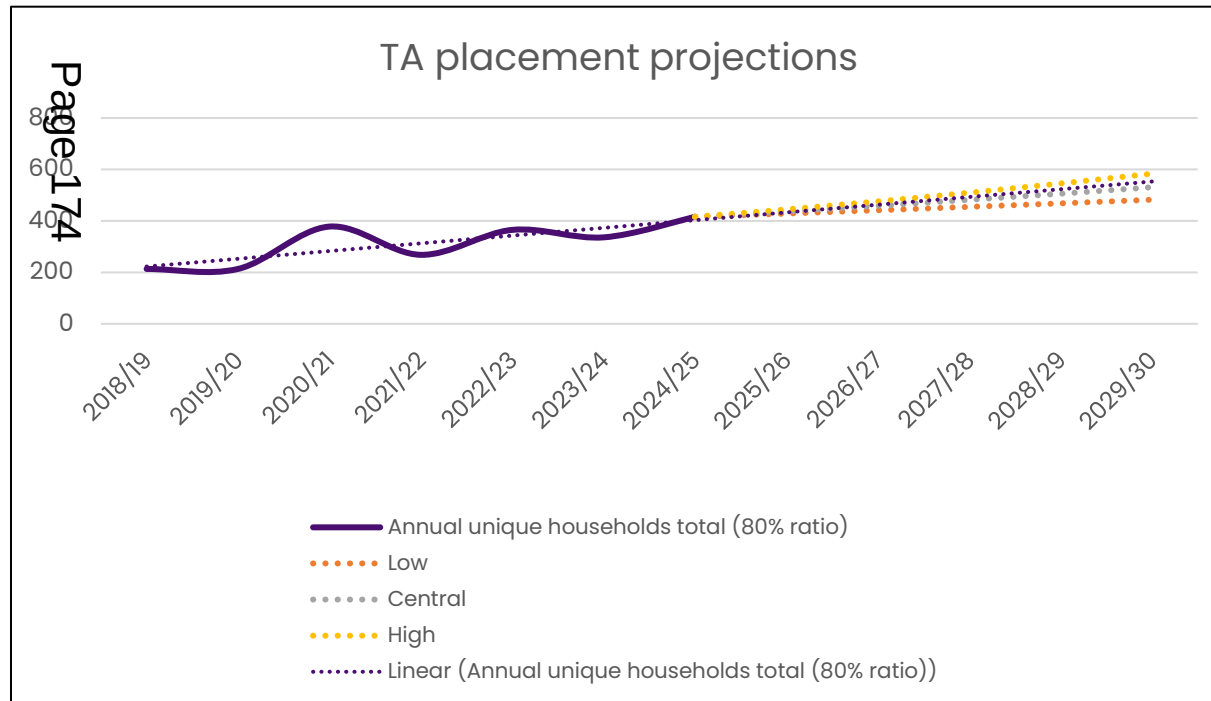
Cohort	2024/25 baseline	2030 central ($\approx +7\%$ per annum)	Approx. change
Young people & care leavers	39	55	16
Victim-survivors of domestic abuse	170	238	68
Perpetrators of domestic abuse	11	15	4
Families	313	438	125
Priority singles	100	140	40
Non-priority singles	83	116	33
Rough sleepers	70	98	28
No recourse to public funds (NRPF)	14	20	6
TOTAL (all cohorts)	800	1120	320

Projections – temporary accommodation

TA demand growth is likely to follow the current linear trend

There were 416 unique households who entered TA during 2024/25. This followed a steady trend of rising demand and reducing length of stay.

Given our expected trends in total requests for assessment, it is likely that demand side pressures on TA will continue. Our central scenario is that TA placements will grow by 24% over the next five-years and there will 531 placements made in 2029/30. The table below sets out how these are likely to be distributed across cohorts.



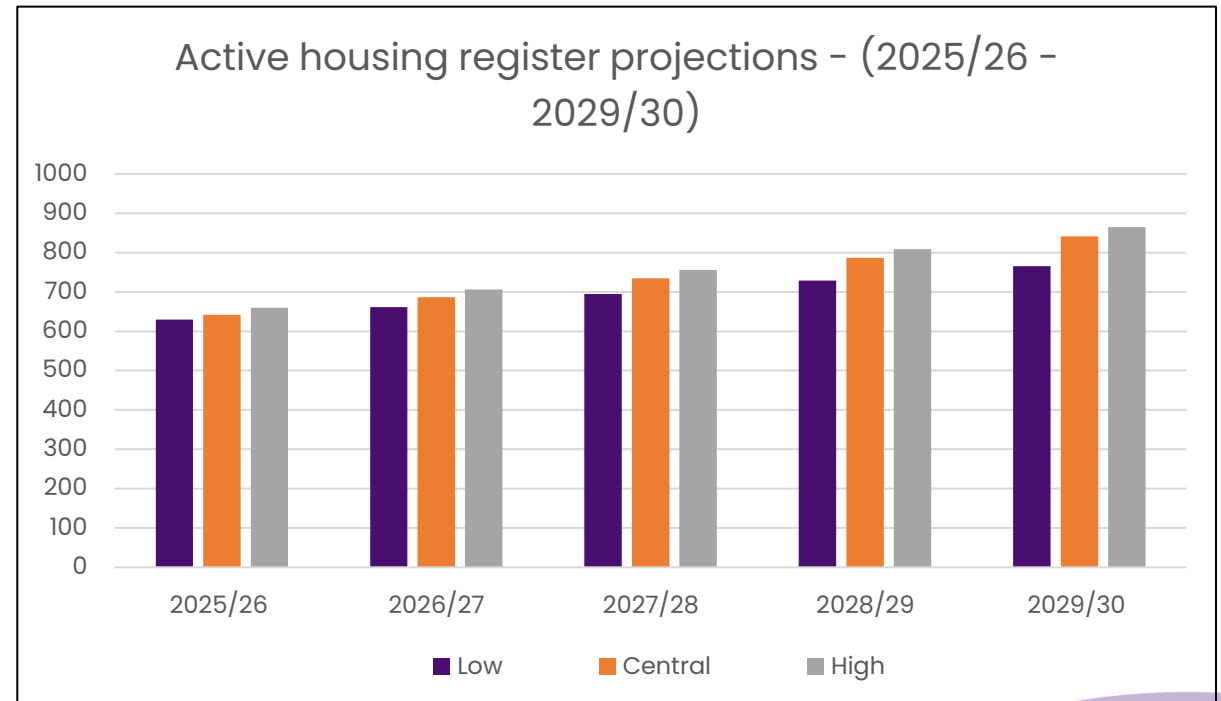
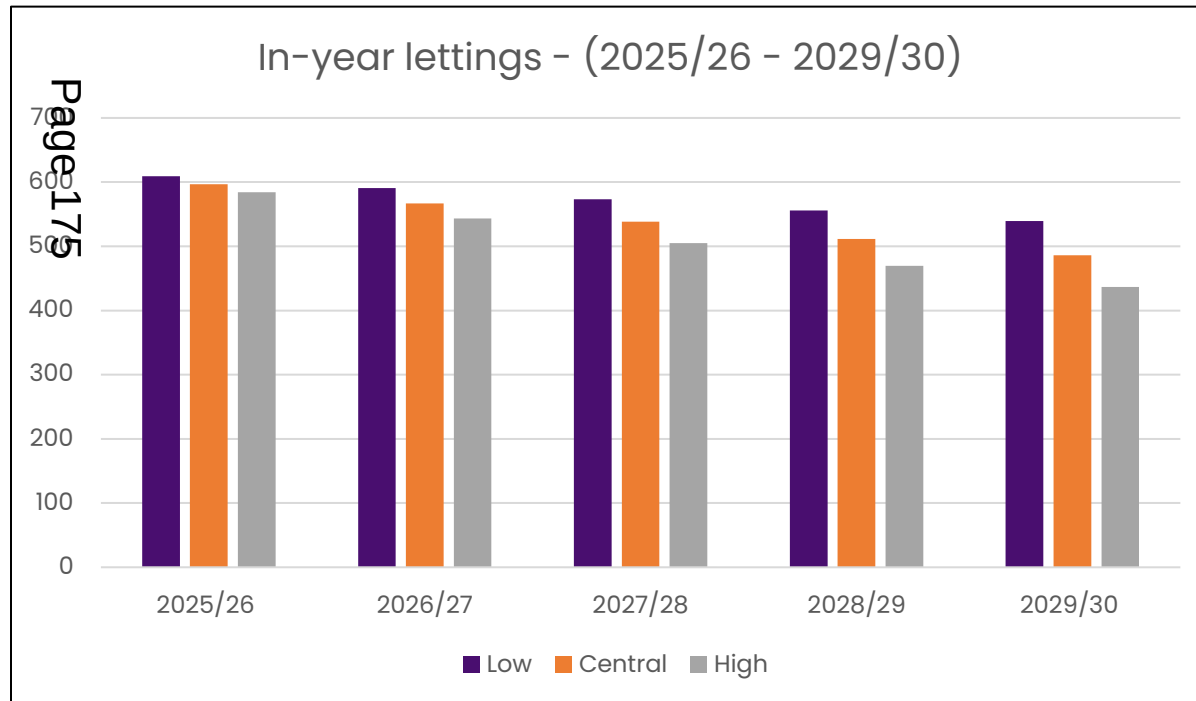
Cohort	TA share	Projected TA households (Central)
Families	32%	170
Priority singles	28%	149
Rough sleepers (priority)	12%	64
DA victim-survivors	22%	117
Care leavers / young people	5%	27
NRPF / other	1%	5
Non-priority singles	0%	0
TOTAL	100%	531

Projections – social lettings

It is likely the gap between demand and supply for social lettings will continue to widen

Demand for social lettings is projected to keep rising at a steady pace over the next five years. At the same time, supply will, in relative terms, decline – annual lettings are likely to fall from 370 in 2024/25 to between 250 – 320 by 2029/30. This is due to the likelihood that the gap between demand and supply will widen substantially; and overall turnover will slow down.

The impact of this will be felt across pathways and result in longer TA stays, fewer relief duty successes; and more single adults stuck in high needs pathways.



Projections – private rented sector (1/2)

The PRS has become a net driver of homelessness, and this is likely to continue

	Scenario	PRS losses (into homelessness)	PRS outcomes (out of homelessness)
2024/25 (actual)	..	225	118
2025/26	Low	225	118
	Central	230	112
	High	236	109
2026/27	Low	225	118
	Central	234	106
	High	248	100
2027/28	Low	225	118
	Central	239	101
	High	260	92
2028/29	Low	225	118
	Central	244	96
	High	273	85
2029/30	Low	225	118
	Central	249	91
	High	287	78

Commentary

Future projections of PRS flows are subject to uncertainty, particularly given recent volatility in the private rented sector and the implementation of the Renters' Rights Act. We have used three scenarios to reflect plausible ranges rather than a single forecast.

Recent data suggests that PRS losses into homelessness may have **peaked** rather than continuing to rise year-on-year. The most recent outturn shows a slight reduction in losses, indicating a potential stabilisation.

On this basis, the **low scenario** assumes PRS losses remain flat, while the **central scenario** assumes only modest growth (2% per annum), and the **high scenario** reflects renewed pressure driven by further affordability shocks or landlord exit.

By contrast, PRS outcomes (households securing PRS accommodation) have shown a clearer and sustained decline. The central and high scenarios therefore assume continued reductions in PRS access.

The key implication is that **system pressure is driven less by rising losses and more by falling exits**. Even where PRS losses stabilise, a shrinking flow of households able to secure PRS accommodation creates a growing net gap. Without intervention to improve PRS access or increase alternative housing supply, this imbalance will continue to feed directly into higher demand for temporary accommodation, longer stays, and increased pressure on social housing and supported housing pathways.

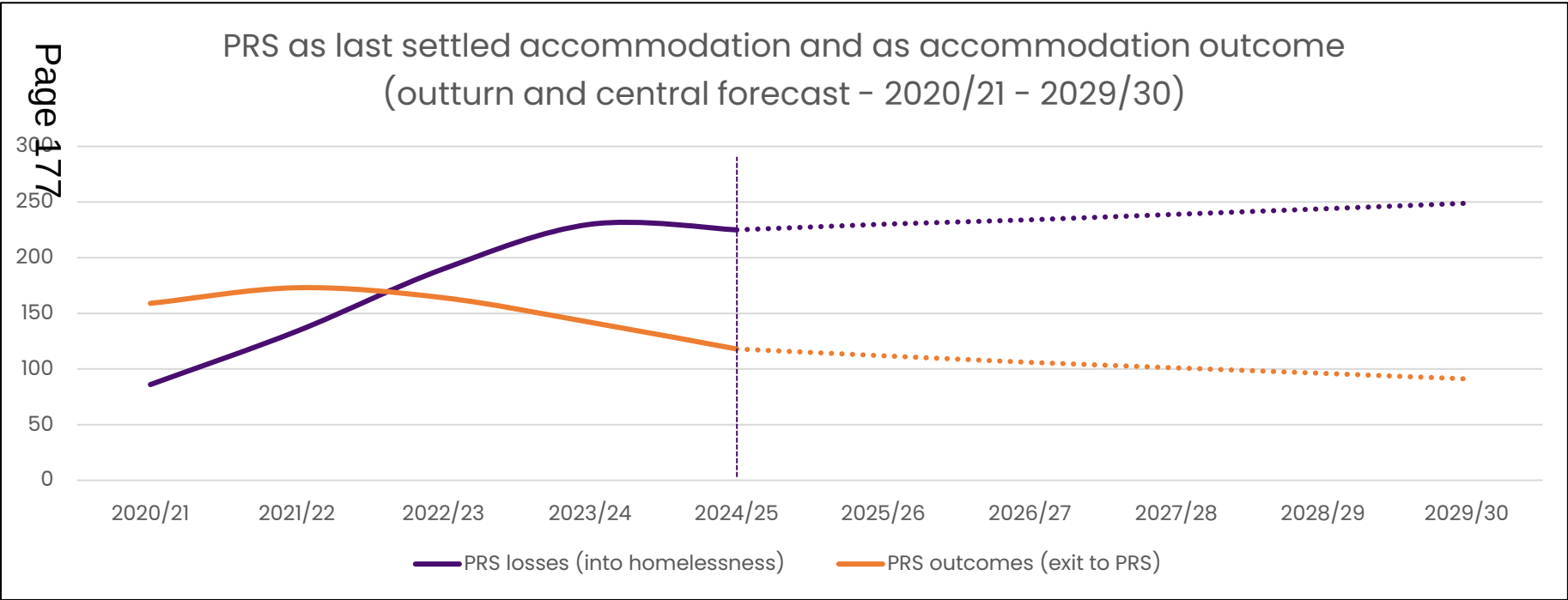
Projections – private rented sector (2/2)

The central projection and the impact on PRS as a net driver of homelessness

In 2020/21 more people found secure PRS accommodation as a route out of homelessness, than lost PRS. In 2024/25 this situation had reversed and the PRS was a substantial net driver of homelessness presentations.

We expect this trend to continue, but the rate of increase to slow down. This reflects the likelihood that PRS has reached a saturation point as overall “affordable” supply decreases.

This structural imbalance explains rising homelessness, increasing placements in temporary accommodation, and falling relief success rates. Without intervention to increase PRS access, pressure on TA and social housing will continue to intensify.



	Net PRS gap
2020/21	-73
2021/22	-39
2022/23	26
2023/24	88
2024/25	107
2025/26	118
2026/27	128
2027/28	138
2028/29	148
2029/30	158

3. Accommodation and service provision

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Key messages

We conducted over 25 interviews with stakeholders across the system. Highlights from our qualitative engagement are:



Cambridge has a strong, well-developed homelessness ecosystem. Stakeholders consistently praised the breadth of provision across statutory, commissioned, voluntary and community sectors.



Workforce churn in the VCSE undermines continuity and specialism. High cost of living and low sector pay results in turnover that destabilises care relationships and slows progress on complex cases.



CAS and the DDSP are vital but overstretched. NHS partners report reliance on the Access Surgery as a default for homelessness, which doesn't align with PCN funding formulas based on list size.



Services for rough sleepers are responsive and well-coordinated. The Streets to Home partnership structure is working well and the TAP approach has broad buy in.



There's a recognised gap in supported accommodation for individuals with complex needs. Expanding housing-led models of supported accommodation/housing first to address this should be a priority.



Cambridge has a number of innovative practices in place which respond to the City's local needs and assets. Examples include housing first, modular homes, a test-and-learn partnership with the CHI and the TAP approach.



The next step for Cambridge is to build on foundations of strong partnership working to include the wider system of services available. This includes strengthening relationships with adult social care, health and justice colleagues.

Support Services – Commissioned/ Receiving Grant Funding

- CGL – Street Outreach
- P3 – Floating Support and Tenancy Sustainment
- Cyrenians – Older Homeless Floating Support
- Wintercomfort – Daycentre- welfare/food/laundry/showers, Crisis Intervention & Support Worker, (Streets to Home), Reconnection Worker (CHI Test & Learn)
- Cambridge Women's Resource Centre
- Cambridge Women's Aid – Domestic Abuse Helpline and Refuge
- It Takes a City – Survive and Thrive, The Haven
- Centre 33 – Young People's Homelessness and Housing Support Service, Schools Programme
- Cambridgeshire Community Foundation – Cambridge Street Aid
- Citizen's Advice – HB+/HB+ Family
- Hope into Action – Empowerment worker
- CHS – Employment support worker
- Campos Home Improvement Agency

Additional Accommodation

- Housing First (HF1/HF2) (Cambridgeshire CC)
- Temporary accommodation (160 own stock units)
- CAS 1/2/3 accommodation (East of England)
- Asylum accommodation (1 unit)
- ASC commissioned supported housing
- Non-commissioned providers of supported housing
- Private landlords
- Hundred Houses Society – Young Parent Project

Social Housing Providers

- City Homes
- 32 registered providers

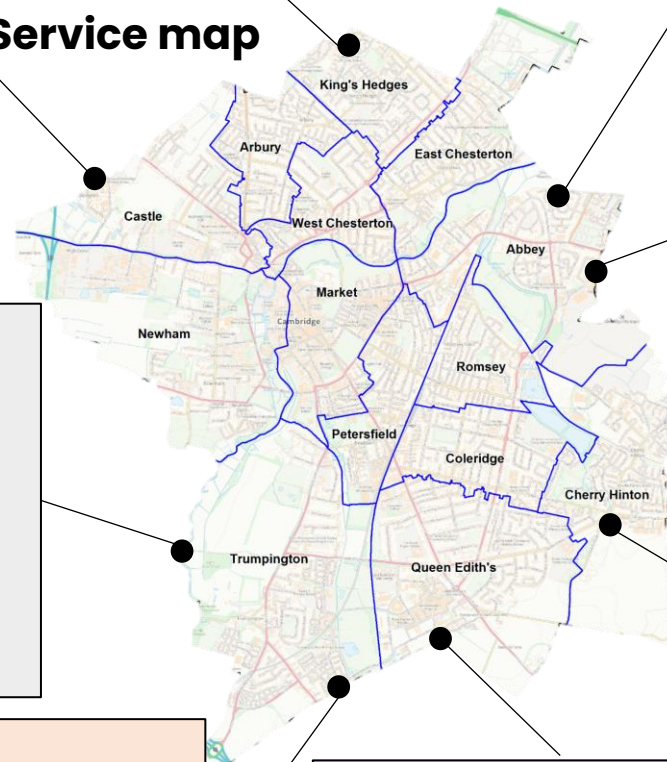
County Services

- Counting Every Adult
- Household Support Fund
- Streets to Home
- Young People's Supported Housing framework
- DA services – IDVAs, target hardening, DA outreach (Impact)
- CGL – HEaRT Homeless Drug and Alcohol Team / Drug and Alcohol Team
- Traveller Liaison service
- Safeguarding
- Cambridgeshire Local Assistance Scheme (CHS)

Statutory Partners

- DWP – Job Centre
- Cambridgeshire County Council – Adult & Children's Social Care, Public Health & Domestic Abuse
- C&P ICB – Cambridge Access Surgery
- CPFT – Dual Diagnosis Street Project
- HMPPS – East of England (commission St Giles Trust, BeNCH CRC)
- Cambridgeshire Police
- South Cambridgeshire District Council (& other districts)
- Cambridgeshire and Peterborough Combined Authority

Service map



Support Services – Non-commissioned

- The Edge – Food Hub/Drop-in
- Cambridge City Foodbank
- ITaC – Street Storage Space
- Cambridge Solidarity Fund – personalised grants
- Vicars Relief Fund – ID, accommodation, deposit and removals grants
- The Elms' – Rape and Sexual Assault Aftercare
- Experience Cambridge
- Cambridge Sustainable Food
- Street Pastors
- Cambridge Churches Homelessness Project
- CHS Charities Network

Supported Housing (Commissioned)

- Cambridge Cyrenians – short & long stay, move-on, Jubilee
- Riverside – The Victoria Project, Springs and Youth Foyer Hostels
- Jimmy's – East Road, 451 multiple needs, modular homes, shared houses
- YMCA – Queen Anne Hostel (16-25)
- CHS – Young Parent Project, Young Futures Outreach, Corona House, Russell Street
- ITaC – Community Land Trust modular housing & Crossways Winter Accommodation
- Orwell's – Whitworth House
- Waythrough – Castle Service

nb. some of these services have beds/support available beyond what's directly commissioned and fundraise to support this

Co-production/advocacy

- Changing Futures Cambridgeshire and Peterborough
- Cambridge Ethnic Community Forum – User Led Migrant and Race Equality Group
- ITaC – Women's Homelessness Action group
- Law Stop Legal Aid Solicitors

Cross-Partner Protocols

- Hospital discharge protocol
- Young people and care leavers protocol
- Intentional homeless protocol
- Eligible households protocol
- Prison release protocol

Council Housing Advice Services

- Statutory part 7 functions
- Income maximisation
- Financial and debt advice
- Rent Arrears Reduction Scheme (RARS)
- Tenancy sustainment
- Landlord mediation
- Family and friends home visiting
- Single Homeless Service
- Townhall Lettings / PRS access
- Housing Benefit Plus
- Homelink/social lettings
- Specialist DA housing worker
- Discretionary prevention spending
- RSAP Programme
- TAP & Prevention Panel

Service review | Prevention

Focus on prevention is “ramping up and improving” across the system with pre-eviction prevention (TAPP) panels and other MDT meetings supporting teams to identify and put in place early interventions.

What’s working well

- **Team-around-the-person prevention panels** with small pots of money help tenants avoid homelessness (e.g. rent arrears) and are considered by system stakeholders to be action-oriented; similarly, health-focused MDTs identify and put in place early interventions for individuals at risk
- Two **pre-release boards** (Peterborough/Fenland and Cambridge) bring together police, local authority housing reps, Housing First/Changing Futures, CGL, and contracted accommodation providers to plan for release and prevent discharge to no fixed above. This is supported by a digital referral system which links in-prison recovery and local community recovery teams to ensure continuity of care.
- A **dedicated GP surgery** (Cambridge Access Surgery) supports early identification and prevention via co-location with other services (e.g. CGL Outreach, the HeART team).
- The City Council is **exploring how to best leverage the Low-Income Family Tracker (LIFT)** to identify and support those at risk of homelessness (e.g. households with multiple debts/cash shortfalls) at pre-crisis point.

Challenges and gaps

- Despite the introduction of the pre-release boards, **prison release remains a challenge**. Currently, one officer (at 0.6 FTE) covers the entire PDU. Further, contracted accommodation provider C-Tec is not permitted to make certain housing referrals (e.g. Duty to refer), leaving probation to fill the gap. A HMPP housing navigator within Cambridge City Council exists and funding is confirmed a further year; if gone, there’s a real gap in specialist ‘bridging’ and navigation capacity.
- **Hospital discharge pathways** and ensuring that the duty to refer was consistently followed was highlighted as a key area for improvement, with inconsistent processes/D2R quality and quantity across different hospitals.

Key Services – Overview



Cambridge Access Surgery

GP practice dedicated to supporting individuals facing homelessness or in temporary/emergency housing. Co-located with the HeART team and CGL outreach.



Discretionary Housing Support

Flexible use of the **Homelessness Prevention Fund** to support with rent arrears and service charges via ‘Access Scheme’



Financial and Housing Advice

In-house financial and debt advice service; **bespoke advice service** for Universal Credits claimants; commissions **Cambridge and District Citizen’s Advice** to provide independent support, advice and representation.



Pre-Eviction Interventions

Rent arrears reduction scheme, in-house **landlord liaison and mediation service** and **pre-eviction panels** (TAPP).



Transition point interventions

Young people and care leavers protocol; prison release panels. OOH Housing Advisor.



Targeted Support

Centre 33’s **Young People’s homelessness and housing support service** and the **Older Homelessness Service and Single Homeless Service** (Cyrenians) support those at risk of losing their tenancies; **Cambridge Women’s Aid** provides advice and support to victim-survivors of domestic abuse.

Service review | Rough Sleeping

Cambridge's system is particularly strong at responding to and supporting people at moments of crisis – “stabilising individuals, providing food and basics” (Provider Focus Group), particularly for rough sleepers.

What's working well

- Focus group attendees and stakeholders across the system reflected on the strength of key rough sleeper services such as **street outreach, the HeART team, and the access surgery**.
- Wintercomfort offers a critical hub for rough sleepers**, providing welfare support, showers, food, assessments by outreach, CGL, and a range of specialist services (women's service, tenancy sustainment, employment support). Health services run drop-ins (CAS nurses/doctors, health navigators), enabling registration and follow-up in a familiar setting.
- The Streets to Home Partnership works well.** Wintercomfort, Jimmy's, Cyrenians, Riverside's Springs, Victoria Project and others are seen as filling clear niches by level of support need; not aggressively competing but working together to support people into the correct level of provision. A shared case management system (Inform) and regular joint panels (Streets to Home, NRPF meeting, hotspot panel, etc.) enables information sharing and coordinated responses.

Challenges and gaps

- There were **repeated references to entrenched rough sleeping**, repeat homelessness, and people “stuck” in hostels or cycling between the streets, hostels and short prison sentences. In particular, this was raised as a challenge facing those with dual diagnoses. Stakeholders highlighted new challenges, including county-lines and complex offending/health needs posing challenges for key services.
- Linked to this, following the closure of a high-needs hostel and limited capacity at Newmarket Road and Housing First, stakeholders noted a **gap in sufficient high-support options**.

Streets to Home – Service Overview



Street Outreach

Street Outreach Team for rough sleepers provided by CGL; actively seek out and verify people who are rough sleeping and engage them with a network of support agencies.



Daytime Drop-in

Wintercomfort provides information, advice, training and daytime support for those who are homeless or vulnerably housed. Hosts health and wellbeing services and a women's only service.



Streets to Home Accommodation

Single assessment via weekly meetings to support individuals to be placed in accommodation. Range of accommodation provided at different levels of support and specialism by Jimmy's Cambridge, CHS Group, Cambridge Cyrenians & Riverside.

Other Rough Sleeper Services



Dual Diagnosis Street Project

Works with entrenched rough sleepers to support access to mainstream mental health and substance misuse services.



Winter provision

Emergency winter shelters provided by Jimmy's, Cambridge Churches Homelessness project and It Takes A City (Crossways)



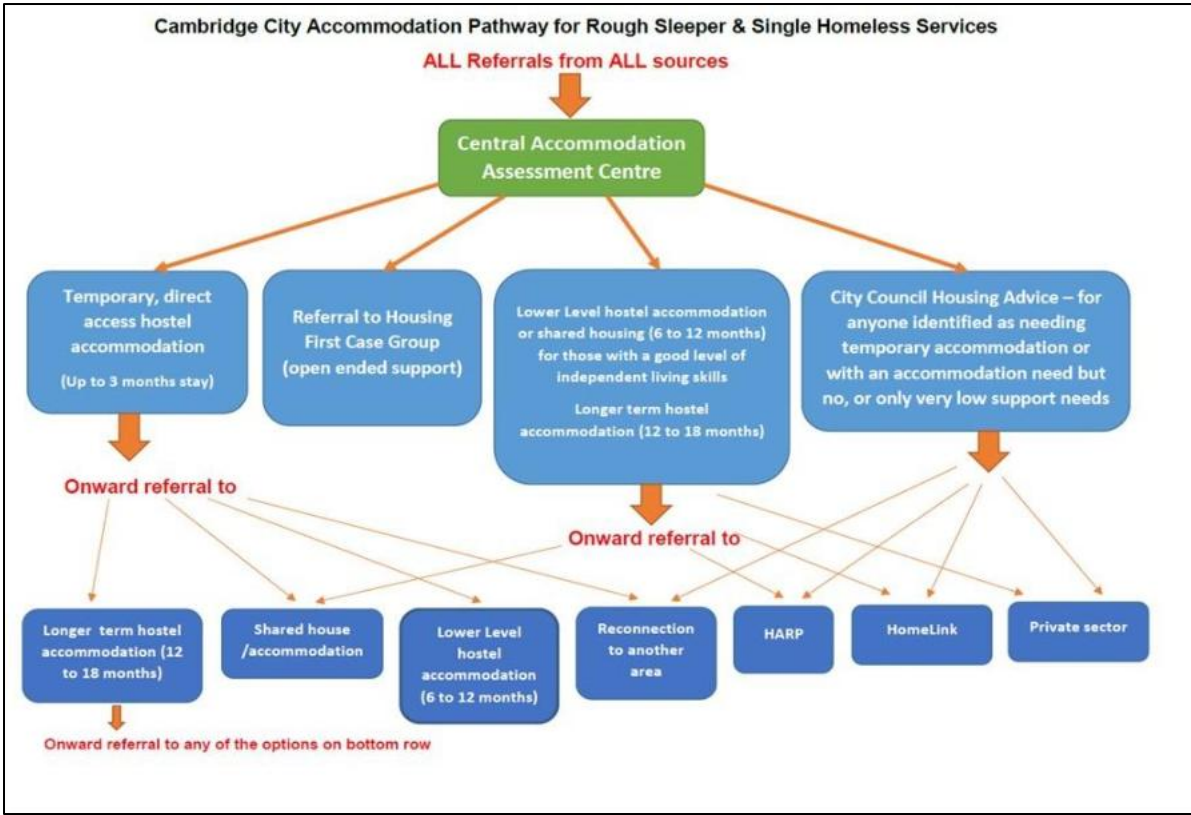
The Haven

Overnight drop-in for homeless and vulnerable women, open 2 nights a week.

Service Review | Rough Sleeping 'Pathways'

There's not one single rough sleeping 'pathway' in Cambridge, instead agencies have several options to refer into depending on the needs of the individual. These include:

- **'Streets to Home' pathway:** Rough sleeping → night shelter/Jimmy's East Road → hostel-style self supported accommodation
- **'It Takes a City' pathway:** Rough sleeping → Crossways winter provision → supported accommodation → resettlement support ('Survive and Thrive')
- **Modular homes pathway:** Rough sleeping → night shelter → modular homes (max of 2 years, provided by Jimmy's and It Takes a City)
- **RSAP pathway:** Rough sleeping → night shelter → RSAP property
- **Housing First pathway:** Rough sleeping → night shelter → Housing First
- **'Team around the Person' pathway:** for individuals who remain or return to rough sleeping, support can be coordinated through the TAP approach, 'Entrenched Non-Engagers Meeting', and 'Counting Every Adult' approach (County-led)



Cambridge City Accommodation Pathways for Rough Sleepers (Housing First Review, 2025)

Service Review | Streets to Home & Modular Homes

Cambridgeshire County Council and Cambridge City Council jointly commissioned the Streets to Home (StH) service in 2022. One of its key providers, Jimmy’s, runs several modular homes, as does It Takes a City (outside the StH partnership).

Streets to Home

- The service, a partnership arrangement between several providers, delivers **outreach support, day services and access to adult supported housing** to rough sleepers.
- The partnership arrangement seeks to encourage a **move away from ‘linear’ models** of homelessness support, encouraging a flexible system which directs individuals to the services which best suit their needs.
- The partnership operates a **common assessment process** and shares information between providers and the City Council via the Inform system. Most assessments come from Cambridge Housing Advice Service or from Jimmy’s East Rd assessment centre. Supported Housing providers look at the incoming referrals almost daily and pick out those referred to their provision.
- The partnership reports its outcomes on a quarterly basis. **A review of outcomes for clients at the end of Q2 2024** found the following outcomes:

Total clients departing the service in Q2 2024/5	51	% of leavers who ‘stepped down’ to a more independent supported setting	33%
% of leavers now unsupported in settled accommodation	31 %	% with negative departure (evicted, abandoned)	30%
		% with neutral departure (‘sideways’ move)	6%

Modular Homes

- ‘Modular homes’ are compact prefabricated units** provided as self-contained accommodation in small enclaves for rough sleepers. Research suggests that by April 2022, there were 33 similar schemes in 22 local authority areas nationally.
- The accommodation is provided as **a steppingstone towards a settled tenancy** and is intended to be suitable for those moving on from hostel accommodation, who have low to medium support needs. While living in the modular unit, residents are provided floating tenancy support.. **As a condition of residence, occupants must be drug-free.**
- There are **currently 26 modular homes in Cambridge**. 22 are managed by Jimmy’s, and the most recent 4 are managed by It Takes A City (ITAC). Research has found that residents of modular homes:
 - Have an improved sense of self**, safety and security
 - Reduce their reliance on drugs and alcohol**, resulting in improved mental and physical health
 - Develop a sense of community and social relationships**, including with family, friends and support workers
 - See improved financial and tenancy management skills**, including – for some – a return to work

Service review | Temporary accommodation

Cambridge City council holds 160 units of own-stock Temporary Accommodation, alongside a handful of emergency units – compared to other Local Authorities, the City performs well on measures of throughput and use of B&Bs.

What's working well

- Cambridge City Council TA is overwhelmingly provided from within the **City's own council housing stock**. At present, there are approximately 160 discreet TA units of varying sizes.,
- The Council **generally performs well on measures of TA throughput**, with most stays moving on between 6–8 months
- **Overspend on TA has come down over the past year**, as has use of B&Bs – in line with government expectations and the new Plan to End Homelessness.
- Council colleagues highlighted the TA team as particularly flexible, reactive and able to efficiently triage and prioritise cases.

Challenges and gaps

- In cases where individuals move from rough sleeping into temporary accommodation, **they risk losing the intensive support** provided by street outreach/day centres, despite needing intensive support during this transition.

There is a range of temporary accommodation (TA) available across the city, and lived experience engagement highlights that, for many individuals, this serves as a key stepping stone towards securing permanent housing. However, some cases persist where the temporary accommodation provided is unsuitable for an individual's needs:

They didn't really offer me, you know, options. They just, there was like, just one way....or, you know, I would be on the street.... but I mean, fortunately it turned out for the better. I mean, I ended up, here..., [but] there's some serious shortcomings. Like there's no shower, it's, there's just the bathtub... so that's usable by any disabled person from the, from the waist down."
(Interview 3)

Service review | Supported accommodation

Cambridge's supported accommodation provision is more varied than surrounding areas, enabling placements in suitable settings – though demand for high needs settings is growing and does not match supply.

What's working well

- **Stakeholders reflected that Cambridge's supported housing/housing stock enables access to more housing options compared to surrounding areas.** This means that staff can actively work to place service users in services/accommodation which genuinely meets their needs. Such an approach aligns closely with the key Housing First principle of choice and established best practice.
- **Long-standing supported-housing providers work in consortium as part of the Streets to Home Partnership** (e.g. Cyrenians, CHS, Jimmy's, Riverside) to deliver flexibility and support individuals to move into placements to suit their evolving needs.
- **Independent research finds clear benefits of living in modular homes** for residents, including improved sense of self and community, mental and physical health benefits, and increased financial and tenancy skills.
- Similarly, research has shown **that Cambridge's RSAP programme has been relatively successful** in getting individuals 'tenancy ready' – of those supported, 46% have moved into an independent tenancy.

Challenges and gaps

- **Participants highlighted the need for more high needs provision** in order to support complex needs safely and effectively.
- **Demand is high across low, medium and high-need provision;** long waiting lists demonstrate capacity pressure – stakeholders noted that individuals in the Streets to Home Pathway are spending longer in short-term/emergency settings (e.g. East Road) than intended.

Supported Accommodation – Streets to Home

Riverside

Cambridge Youth Foyer (16–25, 18 units); Willow Walk (medium support, mixed gender, 20 units); Victoria Project (specialist support for those with dual diagnosis, 34 units); The Springs (low needs, 24 beds)

CHS

Young Parent and Baby Project (8 units); Railway House (18 units, young single individuals, low-medium support); Corona House (6 units, self-contained flats for women, mental health support)

Cyrenians

Short Stay (18 units, live-in staff); Long Stay (Older people project); Move-On (40 units); Jubilee Project (ex-offenders, 10 beds, mixed-gender); Working Houses (12 units).

Jimmy's

East Road (emergency accommodation & short stay, 25 units); 451 (9 units, high-needs, alcohol dependency); Move-On (28 units, multiple properties); Modular Homes (22, active support, max stay 2 years)

Supported Accommodation – Other providers

Approx 125 units

YMCA (young people 16–25, 70 units); Whitworth House (Orwell HA); Castle Service (Waythrough, 17 units, 16–25); Hope into Action (35 units); ITAC modular homes (4 units)

Service review | Housing related support

Service providers take a holistic approach to supporting service users and work in collaboration with the council and other providers to take a 'whole system' view.

What's working well

- **A range of tenancy sustainment, floating support and navigation services are available** for individuals
- **Focus group attendees agreed that services across the system are, broadly, adaptable, flexible and persistent.** Forums where cases are discussed (Streetlife Working Group, TAP meetings and other multi-agency meets) were raised as key enablers of this.
- **Survive and Thrive tenancy sustainment service provides flexible floating support to rough sleepers** in ITaC services, including Crossways and The Haven. The service has been regarded to be successful at engaging previously avoidant service users; in the first 6 months of 2024-5, 30 individuals were supported to sustain longer term accommodation, and 30 others to move on from temporary or emergency accommodation.

Challenges and gaps

- **The TAP approach was highlighted as a key enabler of getting the right support for an individual**, but this level of support is not available to everyone in the system (see next slide). Increasing the number of navigator roles could help create a more consistent "team around the person" approach across the system.
- **There was a sense that knowledge of the range of services available could be better across the system**, including with statutory partners, and that navigating the system is a challenge for both staff and service users. Young people, in particular, were raised as a cohort that require additional navigation support.
- High cost of living in Cambridge alongside low pay in the sector leads to a **high rate of workforce churn, which means a loss of continuity for clients**, and difficulty sustaining specialist teams.
- **Consistency of messages to clients** was repeatedly flagged by stakeholders – mixed messages across services risk setting false expectations and can harm engagement.

Key Services – Overview



Floating Support

P3 Floating Support, Cyrenians Floating Support and Older Homeless Floating Support Service helps individuals access and maintain move on accommodation.



Tenancy Sustainment

It Takes a City's Survive and Thrive service provides support to anyone in self-contained or small shared accommodation with a recent history of rough sleeping or homelessness who do not have a confirmed support offer. Includes tenancy sustainment and resettlement support, meals, food parcels and practical help, rapid moving-in service, mentoring and befriending service, employment outreach service, pastoral care and welfare, supported modular housing. The City Council have an in house tenancy sustainment service – as well as specific services for PRS and THL tenants.



Team Around the Person (TAP)

Launched in 2023 to support individuals experiencing repeat homelessness, the approach looks to 'wrap' multi-disciplinary services around a user.



Specialist support

A range of specialist support is in place, including services such as The Haven (women), Centre 33 (Young People), and Citizen's Advice (employment).

Service Review | The TAP Approach

Cambridge's Team Around a Person (TAP) was launched in 2023 to support individuals experiencing repeat homelessness – the approach looks to 'wrap' multi-disciplinary services around a user, engaging them in the design and process.

Approach

- TAP supports homeless individuals and those at risk of homelessness, who are experiencing **multiple complex needs and disadvantages**. Individuals must meet at least 2 of the following criteria:
 - Substance and/or alcohol use
 - Mental health needs
 - Survivor or perpetrator of domestic abuse
 - Have contact with the criminal justice system or causing street-based ASB.
- The TAP process centres on the **bringing together of practitioners involved in different aspects of a person's care** to create an action plan that addresses a service user's needs.
- A series of meetings – at varying frequency – are used to create, adapt, and coordinate the delivery of this plan, **which service users are invite to join and participate in**. A TAP process ends once the service user is settled in secure accommodation or completely disengages from the process.
- For every TAP, one of **the service providers is nominated as the service user's 'Trusted Person'** – it is their responsibility to liaise directly with the service user.

Strengths of the approach

- **TAP meetings include a wide range of stakeholders and are understood across the system to be effective, action-focused fora**. This includes (but are not limited to) a representative from the council, housing providers, and individual support workers as well as street outreach. Other service providers who are involved frequently include: mental health and drug and alcohol workers, nurses and doctors (especially from the Cambridge Access Surgery), probation officers, and sometimes police.
- **A 'TAP Prevention Panel' was formed in mid-2024**; this is a meeting solely for the organisations in the StH consortium, and it addresses the needs of individuals who are at imminent risk of eviction from supported accommodation (usually because of non-engagement or arrears). As of October 24th, the panel received 22 referrals. Only 4 of these 22 individuals are still at high risk of eviction.

Challenges and outstanding questions

- A recent review of the approach found that **engagement by service users in TAP meetings was patchy** and that more needed to be done to create space for this.

Service review | Housing First

There are currently 23 individuals accommodated by the Housing First scheme in Cambridge – with 59 individuals on the active caseload county-wide. The scheme has been running for over 5 years and is joint-funded by the County & City Councils.

The service is currently running at capacity – 58% of clients are from the City. There are **different ‘types’ of HF** – self-contained units owned by council/housing association (HF1) and clustered self-contained new build units with live-in ‘neighbourhood support workers’ (HF2).

What’s working well

- A **2025 review found that the service is well-run and largely follows the key principles of housing first** (right).
- The proportion of individuals who have ‘graduated’ from the scheme is 13% – compared to 8% across other national pilots, though this is not necessarily a marker of success. Instead, maintaining a tenancy is a good marker and **one of the strengths of the HF scheme in Cambridge is such flexible, ongoing support**. 80% of those accommodated three years ago have sustained accommodation – and there’s been no eviction from the service. There’s no clear data on other aspects of personal progress (e.g. health, employment).
- **Housing First provides intensive support directly to individuals via Enhanced Navigators.**

Challenges and gaps

- As found with most schemes nationally, the **acute shortage of housing – as well as challenges ‘selling’ the model to other providers** – makes it challenging to truly offer choice to clients.
- There is **‘operational distance’ between HF and wider homelessness services**, with some misconception amongst services that HF is a ‘last resort’ for individuals with particularly complex needs.
- **The use of new builds in HF2 has proved challenging** with reports of ASB and community integration
- As a small city, individuals who have been part of the street-life community in Cambridge sometimes struggle to isolate themselves from former associates.



People have a right to a home



Flexible support is provided for as long as it is needed



Housing and support are separated



Individuals have choice and control



Services are based on people’s strengths, goals and aspirations



An active engagement approach is used



A harm reduction-based approach is used

Service review | Home-Link & Social Lettings

The City operates a choice-based lettings scheme, HomeLink, in partnership with other local authorities across the County, allowing applicants to bid for properties. Overall, move-on was perceived to be the most challenging part of the system.

What's working well

- Stakeholders felt that the **Council team managing Home-Link and lettings is communicative** and collaboratively with providers.
- The **delivery of new homes in Cambridge has continued to outpace benchmarks** with one of the highest housebuilding rates in the country. The Council built 330 new council homes directly in 2022/23, which was the second highest number of directly delivered homes by any local authority in England, Wales and Scotland.

Challenges and gaps

- Stakeholders raised concerns around the processing time for Home-Link applications**, citing a wait of 12-16 weeks minimum after submission to be able to bid on properties
- Long-term support is key for individuals as they 'move-on' to prevent repeat homelessness** – both in the form of tenancy sustainment support and wider services which connect individuals to a community. More broadly, staff reflected on the (im)balance of resources aimed at the 'frontline' as compared to other parts of the system. **HA leads also noted an increase in support needs of tenants**, posing management challenges, including ASB.
- There's a **need to improve information sharing with Housing Associations** – stakeholders cited limited information on nominations and poor-quality referrals as key business risks and pressures. **Stakeholders noted a gap in a strategic forum** for housing associations to input in and work alongside the wider housing system.
- Unaffordability was a consistent theme** with stakeholders noting that affordable rental rates in Cambridge City price out many relying on LHA and create a business challenge for HAs.

Lived experience engagement similarly found that effective and ongoing tenancy sustainment support is critical to preventing repeat episodes of homelessness.

"I'm struggling a bit at the moment actually, to be honest...with just basic domestic stuff. I just need a little bit of input from someone to come and make sure I'm OK because I have, like, I have massive like mood alterations in my state of mind... I don't usually deal with mental health aspects of things because I've had bad experiences in the past. Yeah, so I need time to make sure I'm OK now and again, you know? Having a phone call, Someone to kind of check in on you." (Interview 20)

Service review | Move on – PRS & Townhall Lettings

The Council operates Townhall Lettings, a social lettings agency which sources and manages affordable rent PRS homes for homeless applicants with local connection. Tenancies are provided with tenancy liaison and sustainment support.

What’s working well

- **Landlords generally reflect on having positive experiences with the service**, citing frequent communication and clarity on processes.
- **The Housing Benefit Plus (HB+) Scheme has had good outcomes for singles**. However, there’s a noted additional challenge for families, who face significant affordability challenges and are often reluctant to move outside of the City. Recent changes to benefit caps (two-child limit) may partly mitigate this in future.

Challenges and gaps

- The Access team provides support with deposits and first month’s rent, but the **finance system is slow and cumbersome**, creating delays and barriers to accessing the private rented sector.
- **Landlord bias against tenants receiving benefits continues to be a barrier** to accessing the private rented sector. The PRS team attempts to mitigate this through rent guarantees, but eligibility is assessed on a case-by-case basis.
- Landlords raised examples of multiple cases where tenancies had broken down as a result of diminishing support. **Stakeholders expressed interest in bolstered tenancy support** and support to integrate individuals into the ‘community’, including by enhancing access to employment, training, and volunteering. Building on existing programmes such as Work Well and Way Through, and coordinate with the Combined Authority may provide a route to do so.
- Stakeholders note a need to **explore alternative PRS strategies (DWP/employer links, philanthropic investment)** to increase move-on options.

Key Services – Overview



Townhall Lettings

Social lettings agency operated by the City Council. Sources and manages affordable rent PRS properties to house those who have previously experienced homelessness.



Townhall Lettings Access Scheme

Assists with the cost of moving into PRS via grant payments to cover the deposit and (if necessary) the first month’s rent. Open to those who are homeless/threatened with homelessness and locally connected. Supports individuals to access accommodation across the country.



HB+/HB Families

Introduced in 2016 as a way of making local private sector homes available via a time-limited top up. Available to both single people and families, provides monthly supplement for up to 2 years for households with a homeless duty – expectation is that during the period in which the supplement is paid the household will receive, and engage with, specialist income maximisation and employment advice so that at the end of the period they will be able to afford the full rent without the top-up. Paid as a discretionary housing payment (when the accommodation is in the City) otherwise supplement from the Council’s homeless budget.

Service review | Partnership working

Partnership and joint-working was considered a real strength of the system – though some reflected on this taking place in ‘pockets’. There’s an opportunity to bridge this gap by providing system leadership from the Council down.

What’s working well

- Dedicated, co-located services like **Cambridge Access Surgery (CAS)**, the dual diagnosis street project, and HeART team are repeatedly framed as real assets
- **Multiple MDTs operate across the system**, including for mental health, multiple disadvantage (TAP), NRPFs, and Entrenched Non-Engagers. These were consistently raised by council staff and providers during focus groups as positive, action-oriented developments.
- **Joint working protocols with children’s & adult social care (young people & families) has helped improve processes and integration** – though there’s still scope to build on this.

Challenges and gaps

- Cambridge has a wide network of providers and three operating partnerships (StH, Young Futures, and It Takes a City). This set-up means **that it is sometimes unclear “who leads” on strategy** and there can be tensions over funding and provision.
- **Other GP practices/PCNs often default to “send people to CAS”**, which de-skills mainstream services and leaves homeless people outside the city centre with big access barriers (travel, cost, time). Because CAS’s registered list is small compared to mainstream surgeries, and PCN resource allocations (social prescribers, etc.) are based on list size, **CAS is under-resourced relative to need**
- **Working with statutory partners, particularly adult social care was described as challenging**, with participants feeling that adult services do not fully understand the pressures facing housing and homelessness teams and that cases are ‘bounced around’. Hospital and prison discharge (DtR) processes were also viewed as inconsistent.

Lived experience engagement highlighted the value of partnership working when it enables service users to have a single point of contact:

“I’ve got somebody who is a key worker...And he’s just, you know, open to help...And if it’s anything he need of me, he’s just calling me. If it’s anything I need, I can always call him. But he’s just asking how I’m getting on, if it’s anything I need in my life, how I’m getting on with my situation, if I need any things with the paperwork, you know, stuff like that.”

(Interview 7)

Service review | Specialist support

The City has a number of specialist services available for key cohorts, including individuals experiencing Severe and Multiple Disadvantage – where available, these are seen to be key assets in the system.

What's working well

- **The Dual Diagnosis Street Project is perceived to be critical by system stakeholders**, representing an [innovative response](#) to street homelessness. The team is well connected with other homelessness services.
- There's a wide range of DA services commissioned cross-County (right). **Cambridge City Council is DAHA accredited and County colleagues reflected on working closely with Council staff**, particularly the community safety team in the context of perpetrator management and target hardening.
- Key services in the city, including Cambridge Women's Aid Refuge, the Women's Resources Centre and The Haven were all regarded as strengths. **The Haven, in particular, was seen to meet a previously unmet need** for rough sleepers.

Challenges and gaps

- **DA colleagues raised concerns regarding the treatment of DA victim-survivors on HomeLink** – with the suggestion that these individuals, if threatened with homelessness, should be allocated Band A or supported into the PRS. Linked to this, it was felt that training and knowledge of domestic abuse in housing teams could be improved.
- There is a **significant gap in immigration/legal advice services**. **Victim-survivors** of domestic abuse with no recourse to public funds face particularly acute challenges, including a scarcity of refuge spaces.
- **Hidden homelessness and gendered experiences** – Commissioners highlight how women often sofa-surf rather than rough sleep and may be under-counted; they stress the need to keep women's specific needs (and DA) in mind in future strategy.
- **Focus groups raised gaps in immigration advice/new refugee/asylum support in the City** – for those affected, insecure status represents the primary barrier to accessing settled accommodation.

Key Services – Overview



Domestic abuse services

There are two refuges in the City (Cambridge Women's Aid and The Haven) as well as wider support services, commissioned by the County Council, including DA outreach, target hardening/sanctuary scheme, housing IDVAS co-located with housing teams (including specialised roles for those from BME backgrounds and those with NRPF), and a small project providing safe accommodation for those who struggle to access 'mainstream' temporary accommodation or a refuge (e.g. those with pets).



Dual Diagnosis Street Project

Launched in 2017, works with entrenched rough sleepers who are rough sleeping or in a hostel/temporary accommodation. Supports service users with low-level mental health and substance misuse interventions as well as supporting access to mainstream substance misuse and mental health services. Co-located with street outreach and the access surgery.

Service review | Reconnection

A test-and-learn programme in progress in collaboration with the Centre for Homelessness Impact. Conversations with stakeholders highlights the importance of addressing reconnection and ensuring consistency in approach between services.

What's working well

- **Cambridge City Council and the Centre for Homelessness Impact have collaborated on a test-and-learn reconnection worker**, based out of Wintercomfort. The role supports those rough sleeping/vulnerably housed to be reconnected to their area of local connection. The post signposts to support, information and appropriate services, as well as liaising with the Council on reconnection – all data collected is shared with the CHI to evaluate.
- stakeholder **feedback suggests that this is proving useful**, though evaluation outcomes are not yet released.

Challenges and gaps

- **Local connection was consistently raised as a key system blocker**, creating a housing challenge in terms of placement in temporary and move-on accommodation and repeat homelessness as people abandon tenancies to return to Cambridge to be closer to services. DA colleagues reflected that a lack of services in surrounding authorities meant that some service users are reluctant to move away despite real threats to their safety.
- **This creates tension in the system, as stakeholders navigate healthcare universality and housing eligibility criteria** – Public health/CGL must support anyone present (no threshold, mandated access), while housing services are bound by local connection and eligibility rules; this can create friction when health stabilises someone who then finds they cannot be accommodated locally.
- The **importance of working with surrounding Local Authorities (in light of LGR) to prevent homelessness** and to address this challenge was raised across interviews.

Local connection was raised multiple times during lived experience engagement as a key barrier to gaining support – interviewees highlighted difficulties understanding the expectation of different services/partners and the requirement to prove connection as sometimes intrusive and undermining trust between themselves and support workers.

"I had to prove I'd lived here all my life... they could see where I was withdrawing money. It's absolutely crazy." (Interview 14)

"I was born in Cambridge... but I found I didn't have a local connection to the city in which I was born – that was a huge barrier." (Interview 8)

Gap analysis | Current demand (1/2)

Our engagement to date has highlighted 8 emerging gaps that could be addressed with additional or reprioritised investment

High needs accommodation and Housing First Provision

High-needs hostel capacity is limited – Newmarket Road/Jimmy's and Housing First are "maxed out" or have waiting lists as long as the number of beds, contradicting intentions for short assessment stays. High-needs provision lost with previous hostel closure.

Dual diagnosis and healthcare access

DDSP team in CPFT is critical, but under pressure – challenges in formal healthcare settings means that mental health waits are far longer than substance misuse treatment. This can mean that people with co-occurring mental health and substance misuse issues get stuck in a "vicious cycle" between hostels, hospital and custody.

Fragmented MDTs & 'Pockets' of collaboration

MDTs and panels create a busy and sometimes fragmented operating environment – some people described this in terms of "meeting fatigue", and this creates a gap in how information and accountability flow within the system. **Collaboration with statutory partners also remains a challenge, leading to people falling through the cracks at key transition points.**

Hidden groups and intersectional needs

Women, domestic abuse victim-survivors, sex workers, transgender, non-binary and people with NRPF are at risk of being under-served or mis-categorised; women especially may be sofa-surfing and not counted as rough sleepers. Strategies and services may over-focus on visible street homelessness and male-coded presentations, leaving important needs unmet.

Gap analysis | Current demand (2/2)

Data and information sharing process

Despite good practice in some areas (shared “Inform” system, MDTs), there is still **inconsistency in practice, including differential use of inform and information transfer between services**. This can mean that people tell their story multiple times; some key information gets lost at handovers; and delays in support when moving between services.

Centralisation of the CAS

CAS is a great asset but has become a “magnet”. Other practices sometimes disengage from homelessness and leave it for “CAS to deal with”. CAS is also under-resourced relative to complexity because PCN resource allocation relies on list size.

Tenancy sustainment is a key challenge

Long-term support is key for individuals as they ‘move-on’ to prevent repeat homelessness – both in the form of tenancy sustainment support and wider services which connect individuals to a community. Stakeholders reflected on the (im)balance of resources aimed at the ‘frontline’ as compared to sustainment; HA leads also noted an increase in support needs of tenants.

Workforce capacity, skills and retention

High cost of living in Cambridge alongside low pay in the sector leads to a **high rate of churn in the provider sector, which means a loss of continuity for clients**, and difficulty sustaining specialist teams (e.g. dual diagnosis).

4. Resources

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Financial resource landscape

Cambridge City Council

Grant	Description	£
Homelessness Prevention Grant	Ringfenced grant to deliver services to tackle and prevent homelessness.	£1,441,808 (2025/26)
Rough Sleeping Prevention and Recovery Grant	Continuation of RSI funding for 2025/26	£1.188m (2025/26)
Winter Pressures	Complements the Rough Sleeping Initiative 2022-25 in supporting local authorities to create additional off the street capacity for people sleeping rough in winter.	£156,120 (2024/25)
Rough Sleeping Drug and Alcohol Treatment Grant	Implement evidence-based drug and alcohol treatment and wrap around support for people sleeping rough or at risk of sleeping rough, including those with co-occurring mental health needs	£489,021 (2025/26)
Homes for Ukraine	Support local communities to offer people from Ukraine the warmest possible welcome to the UK.	£550,640 (2024/25)
Rough Sleeping Accommodation Programme (RSAP)	Includes the AfeO programme for this year. RSAP provides move-on accommodation for rough sleepers	£60,000 (2025/26)
Discretionary Housing Payment	Supporting people affected by the welfare changes and to assist those in severe financial hardship. Covers those with Housing Benefit claims and those in receipt of Universal Credit.	£138,217 (top up limit of 2.5x allocation) (2025/26)

Cambridgeshire County Council / Partners

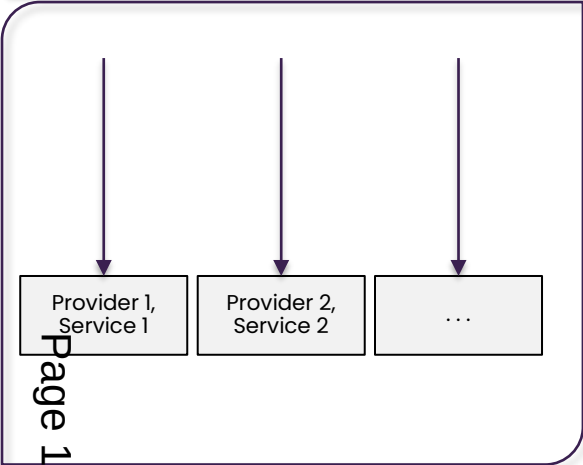
Grant	Description	£
RSPARG/Rough Sleeping Initiative	Flagship funding programme to support national rough sleeping strategies and commitments	£235,971 2025/26
Household Support Fund	Assist vulnerable households struggling with the cost of living	£6.312m (2025/26)

Capital Funding

Pot	Description	£
Local Authority Housing Fund	MHCLG capital fund to build and purchase additional accommodation in light of recent humanitarian schemes (e.g. Afghan and Ukrainian refugees)	LAHF 1/2 = £10,999,288 £1,868,000 LAHF 3 = £921,675.00.
Affordable Homes Programme (East of England)	Government grant funding for developers to build social and affordable homes.	£336m

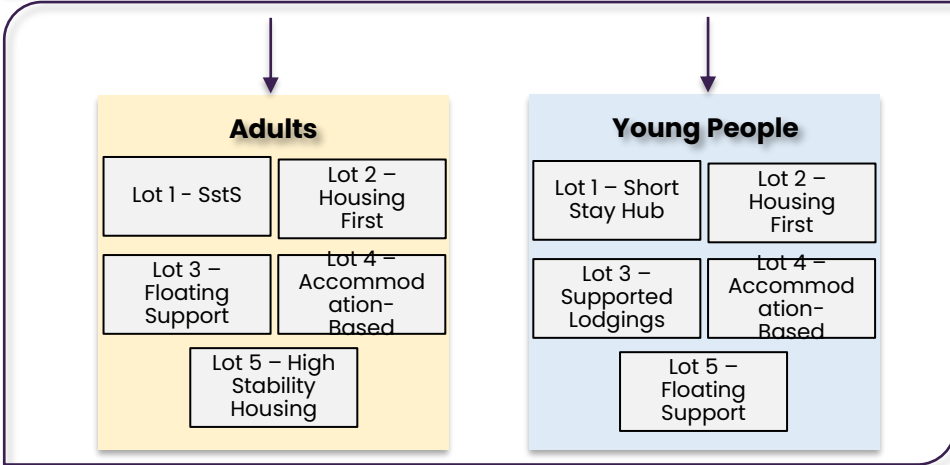
Commissioning approaches

Option 1 – Individual contracting for each scheme/ service



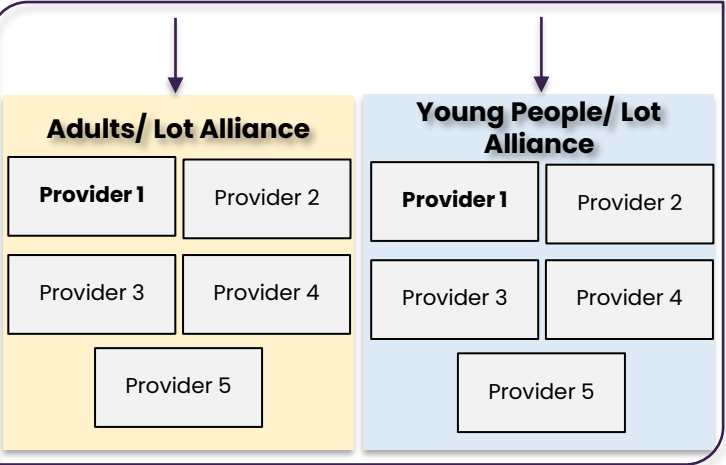
Separate contracts and objectives with each party. Performance individually judged. Provision made for disputes. Contracts based on tight specifications

Option 2 – All services commissioned via framework agreement or DPS



Establish approved provider lists and standard contracts. Could seek one or multiple providers, depending on the Lot. Allow for guaranteed block volume of units. Potential for spot purchase arrangements depending on actual demand / funding changes. Can call-off new provision via direct award or further competition. Can add new Lots as required. Could have lots around provision type (above) or cohorts. Mixed range of accommodation settings that supports different types of occupancy and households.

Option 3 – Lead provider or alliance/ consortia



Framework agreement with one contract and performance framework. Range of providers are incentivised to work together. Success judged on performance overall. Identify lead service providers who are encouraged to form supply chains. Lead provider would retain responsibility for ensuring that support is delivered, but could delegate to a partner or sub-contractor

examples

- Bristol** – In 2017, introduced the lead provider model, dividing its 850 beds for single homeless people into men-only pathway, a women-only pathway, a mixed pathway, and a specialist substance misuse pathway. Each pathway entered into a seven-year contract with a lead provider.
- Plymouth** – Seven partner organisations who are contracted as an Alliance. Commission a further five sub-contractors to the main contract. Funding is allocated to the Alliance as a whole, with agreed budget allocations to each service that have flexed with the needs of the wider system.

Resources | Future pressures & opportunities (1/4)

The Oxford–Cambridge Growth Corridor is a government-backed initiative to develop links between the two university cities and London to drive an ‘innovation cluster’ in South–Central England., building on existing growth and success in the region.

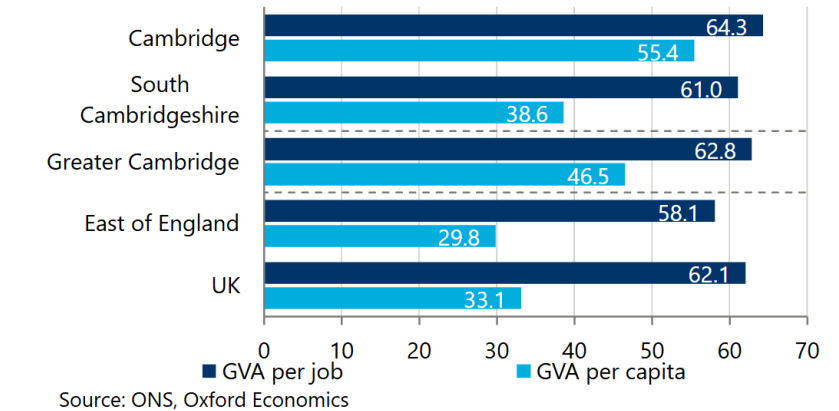
- Cambridge has seen significant economic and demographic growth since the early 2000s, linked to the growth of the knowledge and biotechnology economy of ‘Silicon Fen’.
- Since 2000, **the Greater Cambridge population grew by 79,900 residents at a rate of 1.3% per year**, more than twice the UK average (0.6% per year). Both Cambridge (1.4% per year) and South Cambridge (1.2% per year) rank among the fastest growing local populations across the UK over this period.

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- **Professional, scientific & technical activities alone formed almost a quarter of all employment in 2023**, more than twice the equivalent proportions both regionally and nationally. The Greater Cambridge economy benefits from relatively high GVA per capita. At £46,500 per resident in 2023, GVA per capita is around 40% higher than the national average, with Cambridge itself (£55,400 per resident) ranking in the top 95% of the UK’s 361 local authority areas by this measure.

- **Despite relatively high median earnings, Cambridge has seen growing challenges in housing availability and affordability as a result.** Relative to local pay, Cambridge has remained one of the least affordable places outside London for buying or renting a home in the country. The median house price is 11.3 times median earnings (compared to 7.7 for England as a whole), while the median rental price is 33% of median pay.
- While plans to develop the ‘Oxford to Cambridge Arc’ have been in progress since 2003, **the current Government has [shown renewed commitment to growth in the region](#)**. The aim of the scheme is to further ‘unlock’ the [innovation and economic potential of the region’s knowledge economy](#) by building new homes, infrastructure, and business space, supported by bodies like the Cambridge Growth Company (CGC, a public corporation) and significant investment in transport (East West Rail) and water.
- There is an ambition that **this will contribute up to [£78bn](#) to the UK economy by 2035**.

Figure 2.1. Headline indicators, Greater Cambridge and comparator areas, 2023
£ thousand, constant 2022 prices

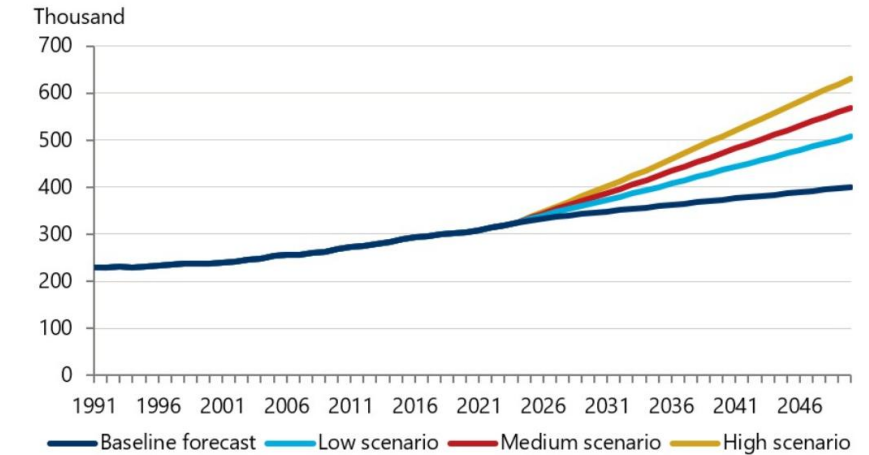


Resources | Future pressures & opportunities (2/4)

[Modelling](#) by Oxford Economics looked to understand the potential impact of such economic growth (low, med, high scenarios) on the Greater Cambridge Region. They found that:

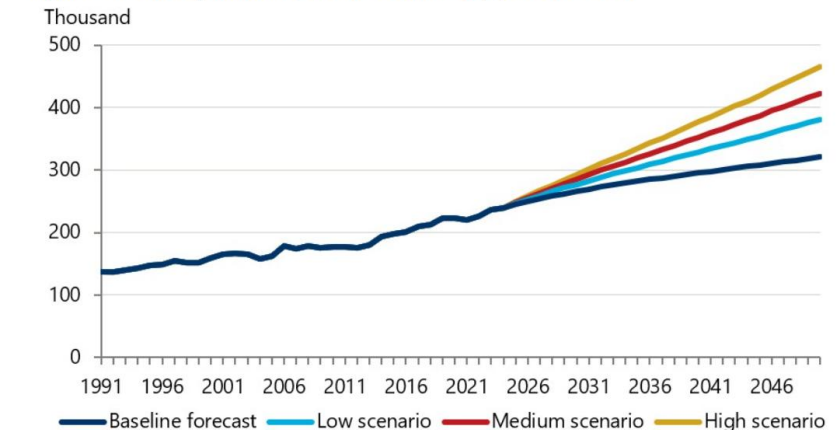
- **The region's population could be expected to grow by an average of 1.7% to 2.6% per year.** The Greater Cambridge population would thus increase to 507,000 to 630,000 by 2050, between 60% and more than double the current population (319,000 in 2023).
- **Such growth scenarios would attract both internal and international migrants to Greater Cambridge**, with analysis suggesting that between 41,000 to 68,000 new international migrants would arrive, and approximately 148,000 to 244,000 new residents moving domestically.
- **Appropriately housing this growing population is a key future opportunity (as a key driver of the economic growth) and pressure for the region.** Local councils have been working with government to better understand its ambitions for building up to 150,000 new homes around Cambridge ([‘The Case for Cambridge’](#)).
- **[Cambridge and South Cambs Local Plans](#) have identified the need for 33,500 new homes across Greater Cambridge** (19,500 in South Cambridgeshire and 14,000 in Cambridge) between 2011 and 2031.
- Cambridge's housing trajectory shows that 14,202 dwellings are expected to be delivered in Cambridge between 2011 and 2031 – **with [38,298 dwellings expected across the City and South Cambs](#)**.
- As of 31 March 2023, **around 60% of these new homes had already been completed.**

Figure 4.7. Population by scenario, Greater Cambridge, 1991 to 2050



Source: ONS, Oxford Economics

Figure 4.1. Jobs by scenario, Greater Cambridge, 1991 to 2050

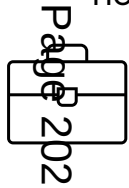


Source: ONS, Oxford Economics

Resources | Future pressures & opportunities (3/4)

As a university city, Cambridge faces both unique pressures and opportunities in tackling homelessness – and there's more that could be done to unlock the role of the university.

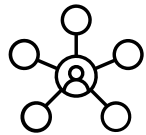
- A [2022 paper](#) by the Centre for Homelessness Impact found that, across university towns in the UK, applications to local authorities for homelessness assistance per head are significantly higher compared with areas without a university (1,428 per 100,000, compared with 1,007). Rates of households living in temporary accommodation are more than twice as high, while the prevalence of rough sleeping is more than three times greater (13 per 100,000, compared with 5).
- As often major actors in their communities, universities have an opportunity to use their power to support people impacted by or at risk of homeless. **Universities hold 'levers' in their roles as employers, land-owners, conveners, researchers and educators:**



Employers: CHI calls for universities to look to be inclusive in their hiring practices, including: advertising some posts in The Big Issue; removing references to qualifications (if these are not relevant to the role); and reflecting on whether criminal convictions are relevant to an application.



Landowners and landlords: Universities in England and Wales alone own more than 52,000 hectares of land and property. Oxford and Cambridge colleges own 41,580 hectares of land. Universities should act as a responsible landlord, offering secure and safe housing at affordable rates, including by letting to people in receipt of benefits or with a recent history of homelessness. Properties can also be offered to organisations working to support people affected by homelessness. In instances where universities have buildings which they own or lease that no longer suit their current needs and are allocated for future development these '[meanwhile](#)' sites could be converted for short or medium-term use as accommodation for people impacted by homelessness.



Research and education: University councils, vice chancellors, leadership teams, academic and non-academic staff and students could consider how they can use their reach and convening power in the communities within which they are based to address homelessness. This convening power can be, and often is, deployed through extracurricular activity by students and staff to engage with nearby homelessness services and community organisations, or even run initiatives themselves.

Resources | Future pressures & opportunities (4/4)

The growth of Silicon Fen, alongside Cambridge's existing rich network of local assets, opens further opportunities for social investment and philanthropy – including innovative funding models.

- **A growing interest in social investment (such as social impact bonds) in the housing and homelessness sector poses an opportunity in light of economic growth in the region.** One way this has been enabled [elsewhere](#) is through the development of local homelessness Charter to guide collaboration between local government, nonprofits, community members and local businesses.
- [Social Impact Bonds](#) are an agreement between Government, delivery organisations and social investors, whereby investors agree to fund the delivery of a particular programme and the Government commits to pay for the achievement of certain positive social outcomes. Projects funded in this way **typically involve working with people who might have complex needs, leading to a higher level of risk involved in achieving the outcomes.** This means investors tend to come from socially-motivated organisations who care about the outcomes and understand the associated risks – the University of Cambridge represents one such potential actor.
- **In London, the use of Social Impact Bonds to support individuals experiencing Rough Sleeping was trialled and evaluated between 2012 and 2017.** The London Homelessness SIB mobilised social investors to provide the up-front investment needed for two providers to deliver interventions to 830 rough sleepers. The interventions were designed around a navigator model, whereby key workers adopted a personalised and flexible approach, supporting the cohort to access existing provision and achieve sustained long-term outcomes. The results show that, when compared to a well-matched comparison group, the intervention significantly reduced rough sleeping over a two-year period.
- [Big Society Capital](#) argues that the [social housing sector has seen the entrance and rise of private equity-funding models](#) including the launch of affordable housing investment funds – they estimate that [the value of all social investment in the UK was worth £6.4 billion at the end of 2020 and that social property funds accounted for 45% of these investments](#). **Given Cambridge's growing private sector economy and focus on innovation, there exists an opportunity to consider how to leverage this growing influence and sector.**
- However, despite this huge increase in investment there is remarkably little evidence of the effectiveness of this approach at this point. The CHI is undertaking an evaluation to explore this.

5. Recommendations

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Recommendations – building on what works

A prevention led, strengths-based approach

These recommendations recognise that Cambridge already has **strong foundations**, particularly in crisis response, partnership working and specialist provision. The focus is on **doing more of what works earlier**, rather than replacing existing models. We have framed our recommendations across three areas:

Strengths-based	Developing practice	Filling the gaps
These recommendations recognise that Cambridge already has strong foundations, particularly in crisis response, partnership working and specialist provision. Key strengths we are building on: • Strong multi-agency working (MDTs, panels, streets to Home) • Trusted voluntary and community sector relationships • Established specialist provision (e.g. DA, rough sleeping, substance misuse) • Positive examples of relational, person-centred support	These recommendations respond to evidence that good practice exists, but is uneven, overstretched or too late. The emphasis is on consistency, clarity and continuity, not wholesale change. What we are strengthening: • Earlier identification of risk • Smoother transitions between services • Better matching of accommodation and support to need • Clearer ownership and accountability	These recommendations address areas where lived experience, data and partner insight all point to clear prevention failures, where people fall through gaps despite engaging. Key gaps identified: • Upstream PRS instability and debt • Health access outside crisis points • Safety-led responses for women and survivors • Support for people excluded by rules or system design • Under-served groups whose homelessness remains hidden

Taken together, these recommendations do not seek to replace what already works in Cambridge. Instead, **they strengthen and extend effective practice** earlier in people’s journeys, **close well-evidenced gaps** where prevention currently falls short, and embed a **strengths-based, trauma-informed approach across the system**. The emphasis is on starting less, finishing more, and preventing homelessness from becoming entrenched or recurrent.

Recommendations – our approach

We have presented our recommendations under the following three headings. Each recommendation is linked to a key finding.

Policy and Strategy Recommendations

There are nine recommendations that sit under this heading.

The core recommendations here focus on strategic shifts in policy and focus. Working from our data analysis, future demand projections and qualitative engagement we have identified gaps and emerging strategic challenges. The recommendations set out specific policy changes that could help respond to these.

Test and Learn Recommendations

There are six recommendations under this heading.

Test and learn recommendations set out opportunities to pilot new, innovative or expanded service offerings to either address current gaps or respond to shifting patterns of demand. These recommendations are operational.

Lived experience

There are six recommendations under this heading.

All of the recommendations under this heading are linked to key messages, concerns and themes that were co-produced with people with lived experience of homelessness; and corroborated by other review evidence.

The recommendations are operational and consider how commissioning processes, joint-working processes and/or new services could tackle some of the specific issues raised by this group.

Recommendations – rationale and evidence base (1/6)

Each recommendation is linked to a specific evidence source or insights from engagement, data and lived experience

Policy and Strategy

1) Develop a whole-system demand and capacity model covering TA, supported housing, PRS and social lettings

- **Lived Experience:** Participants described being moved between options with little clarity; instability and long waits make pathways feel unpredictable and unsafe.
- **Data:** Rapid growth in approaches and requests for assessments, rising TA demand and overspend, as well as declining social lettings point to structural capacity imbalance.
- **Qualitative:** Partners consistently describe system “blockages” (move-on, high-needs, TA) and fragmented enablers (MDTs, information sharing) needing a whole-system view.

2) Increase high-needs (HF) and step-down supported housing, alongside stronger move-on pathways (e.g. tenancy sustainment)

- **Lived experience:** Participants reported placements that don't match need (safety, disability, trauma), and support dropping away once housed, increasing repeat homelessness risk.
- **Data:** Rising acuity (declining “low needs”), pressure on supported housing flow, and increasing bans indicate mismatch and insufficient high-needs capacity.
- **Qualitative:** Providers say supported housing is “relational not just a bed” but high-needs gaps and lack of move-on are creating longer stays and bottlenecks.

Recommendations – rationale and evidence base (2/6)

3) Maintain a clear local ambition and metric to reduce long-term and repeat rough sleeping

- **Lived experience:** Participants describe entrenched street homelessness and cycling between streets/hostels/prison; stability depends on sustained support
- **Data:** Rough sleeping levels relatively steady but an entrenched cohort persists.
- **Qualitative:** Partners highlight chronic/repeat rough sleeping linked to dual diagnosis and lack of high-support options.

4) Strengthen discharge-to-housing pathways from prison, hospital and care

- **Lived Experience:** Discharge without housing is described as abrupt and destabilising; “continued care gaps” after prison/hospital increase relapse and repeat homelessness.
- **Data:** Pathway pressures show growth from custody and care transitions.
- **Qualitative:** Stakeholders report inconsistent Duty to Refer processes, fragile discharge pathways, and limited bridging/navigation capacity.

5) Develop a homelessness workforce stability and skills plan

- **Lived experience:** Progress is strongly associated with consistent trusted workers; turnover and loss of named contacts undermines trust and continuity.
- **Data:** Workforce/caseload analysis shows demand rising faster than capacity; increasing complexity implies higher skills requirements.
- **Qualitative:** Providers cite high turnover/shortages due to cost of living and pay, destabilising relationships and slowing progress for complex cases.

6) Embed co-production as standard practice in commissioning and service design

- **Lived experience:** Some participants report feeling unheard; co-produced approaches build trust, improve relevance, and reduce re-traumatisation in service interactions.
- **Data:** Review context notes new national expectations to meaningfully engage lived experience; hidden groups are under-counted without co-produced design.
- **Qualitative:** Stakeholders see value in aligning with local charter and strengthening cross-system buy-in through shared, lived-experience-informed priorities.

Recommendations – rationale and evidence base (3/6)

7) Refresh homelessness governance to support the new Duty to Collaborate

- **Lived-experience:** participants reported experiencing fragmented or repetitive services, particularly at the intersections between service areas.
- **Data:** Review identifies fragmented system enablers (MDTs, info sharing) and the national Duty to Collaborate as a key new requirement.
- **Qualitative:** Multiple forums exist, but partners describe gaps in alignment/ownership; clearer governance is needed to drive consistent pathways.

8) Commission additional immigration/legal advice services

- **Lived experience:** Bureaucratic and legal barriers (status, documentation, local connection) cause people to disengage; advocacy is crucial to avoid destitution.
- **Data:** There is limited data on NRPF and under-counted “invisible” groups; lack of specialist advice contributes to unmet need.
- **Qualitative:** Partners highlight NRPF as a gap area, with limited pathways and pressure falling on frontline/VCSE to navigate complex rules.

9) Launch a strategic forum to oversee management and direction of social housing in collaboration with local Housing Associations/RPs

- **Lived experience:** Participants described unclear processes and not knowing what’s happening.
- **Data:** Declining social lettings and increased register pressure are driving blockages into TA/supported housing; longer waits contribute to system congestion.
- **Qualitative:** Stakeholders report risk aversion and “tenant readiness” culture; need stronger collaboration with RPs and better move-on/sustainment

Recommendations – rationale and evidence base (4/6)

Test and Learn

1) Pilot use of predictive analytics to identify and support early at-risk households, focused on PRS sustainment and financial shocks

- **Lived experience:** Debt/benefit issues are repeated tipping points; people struggle with systems without phones/data/energy.
- **Data:** PRS is a growing driver; unsuccessful prevention activity has increased; demand forecasts show continued growth without upstream action.
- **Qualitative:** Council/partners note prevention is improving but needs scaling; revisiting use of LIFT flagged as an opportunity to identify risk earlier.

2) Test a refreshed PRS access model, with revised incentives, risk-sharing and clearer landlord offer

- **Lived experience:** PRS is experienced as insecure/expensive and hard to access due to upfront costs and stigma; instability pushes repeat homelessness.
- **Data:** PRS has become a net driver and declined as a route out (sharp drop in PRS outcomes); losses exceed successful PRS placements.
- **Qualitative:** Town Hall Lettings seen as a strength, but market conditions severe and supply shrinking; need refreshed offer to sustain capacity.

3) Pilot enhanced MDT and dual-diagnosis responses for priority singles and rough sleepers

- **Lived experience:** Participants describe cycling due to dual needs.
- **Data:** Complexity rising; priority singles show very high overlapping needs; dual diagnosis repeatedly cited as a friction point.
- **Qualitative:** Stakeholders highlight long waits for mental health support vs faster substance treatment, creating revolving door patterns.

4) Pilot a primary care inclusion model linked to housing and outreach pathways

- **Lived experience:** Health access is patchy; people rely on crisis care and are discharged back into homelessness; some avoid settings that feel unsafe.
- **Data:** health needs associated with ageing and multiple long-term conditions are increasing in relative and absolute terms, highlighting rising complexity of need.
- **Qualitative:** NHS partners describe current arrangements as placing too much focus on the Access Surgery and not integrated enough with wider pathways/PCNs.

Recommendations – rationale and evidence base (5/6)

5) Test targeted pathways and improved data capture for under-served groups

- **Lived experience:** Women describe heightened risk and “hiding” to stay safe.
- **Data:** there are gaps in the data and instances of “hidden homelessness”, with some invisible groups (women, LGBTQ+, NRPF, young people) potentially under-counted.
- **Qualitative:** Stakeholders identify under-served groups and women’s safety gaps; mixed-gender environments and limited safe spaces reduce access.

6) Test and evaluate innovative solutions in collaboration with wider institutions (e.g. the University) via the use of social impact bonds

- **Lived experience:** Participants emphasise holistic support (connection, purpose, trusted workers) and the risks of fragmented responses
- **Data:** Future demand growth and TA/supported housing pressures indicate the need to expand effective prevention and supply solutions.
- **Qualitative:** Cambridge has engaged local institutions and a strong VCSE ecosystem; partners cite opportunity to mobilise broader civic assets.

Lived Experience

1) Evaluate and develop a business case to expand the TAP model to a wider cohort

- **Lived experience:** Participants described how they benefit most when there is one consistent trusted worker and coordinated support across systems.
- **Data:** Rising complexity and repeat homelessness risk among singles/rough sleepers indicates need for coordinated multi-agency support.
- **Qualitative:** Prevention panels/MDT-style working is viewed as effective but fragmented; scaling TAP offers a structured approach.

Recommendations – rationale and evidence base (6/6)

2) Pilot debt-resolution pathways linked to housing outcomes (e.g. debt write-off, repayment pauses, advocacy)

- **Lived experience:** Participants explained how debt and UC overpayments are barriers that stop move-on even when people are ready
- **Data:** Financial shocks and arrears feature in prevention/relief failure; prevention activity “unsuccessful” has increased materially.
- **Qualitative:** Staff emphasise need for flexible prevention funds and practical problem-solving to stop escalation into TA/relief.

3) Pilot alternative, psychologically safe access points (women-only, substance-free, low-stimulus spaces)

- **Lived experience:** People avoid services when they feel unsafe (around men/drug use); women report high risk of violence and need for safe spaces with accessible hours.
- **Data:** “Hidden” groups are likely to be under-counted; safeguarding risk is therefore substantial but not visible in statutory data.
- **Qualitative:** Stakeholders identify gaps in women-only provision and under-served groups; mixed settings can reduce engagement.

5) Test low-pressure social, volunteering and peer-led activities as core parts of homelessness support

- **Lived experience:** Low-pressure activity, volunteering and peer support reduce isolation and rebuild identity/routine were seen as important for recovery.
- **Data:** n/a
- **Qualitative:** Providers/VCSE describe relational support as central, but capacity constraints mean “recovery” elements can be squeezed out.

6) Pilot strengthened communication standards (clear explanations, decision letters, two-way feedback)

- **Lived Experience:** Participants explained how poor communication and not being listened to is frustrating and retraumatising; lack of clarity leads to disengagement.
- **Data:** A substantial proportion of “contact lost”, withdrawals and unsuccessful duty endings indicate process/engagement failure points.
- **Qualitative:** Stakeholders note fragmented enablers and inconsistent processes; clearer communication supports prevention and sustained engagement.

Delivery | Policy and Strategy (1/2)

*2021-2026 Strategy Alignment
 ✓ = Already included / explicitly aligned
 △ = Partially included / implied
 ✕ = Not included

Situating recommendations within a delivery context in preparation for strategy development

Key message	Recommendation	Audience	Owner	Delivery mechanism	Indicative timeline	Alignment with National 'Plan to End Homelessness'	2021-26 Strategy*
Demand has grown sharply and future pressure is predictable	Develop a whole-system demand and capacity model covering TA, supported housing, PRS and social lettings	Councillors, senior leaders, partners	CCC, CPCA	Annual analytical model embedded in budget and commissioning	6-12 months	Supports national expectations on sufficiency and TA reduction	✕
Supported housing works but is blocked by lack of move-on and high-needs capacity	Increase high-needs (HF) and step-down supported housing , alongside stronger move-on pathways (e.g. tenancy sustainment)	Commissioners, providers	CCC, Cambridgeshire County Council	Recommissioning, joint funding, use of new Supported Housing regulatory powers	12-24 months	Direct alignment with national supported housing expansion funding	△
Rough sleeping is stable but entrenched for a small cohort	Maintain a clear local ambition and metric to reduce long-term and repeat rough sleeping	Public, partners	Cambridge City Council	Agreed targets, performance reporting, Streets to Home governance	6 months	Directly aligns with national target to halve long-term rough sleeping by 2029	✓
Transitions from institutions remain a key failure point	Strengthen discharge-to-housing pathways from prison, hospital and care	HMPPS, NHS trusts, CCC	CCC, County Council	Formalised protocols, navigator roles, Duty to Refer assurance	6-12 months	Strong alignment with national aim to reduce homelessness from institutions	△

Delivery | Policy and Strategy (2/2)

*2021-2026 Strategy Alignment
 ✓ = Already included / explicitly aligned
 △ = Partially included / implied
 ✕ = Not included

Key message	Recommendation	Audience	Owner	Delivery mechanism	Indicative timeline	Alignment with National 'Plan to End Homelessness'	2021-26 Strategy*
Workforce instability undermines outcomes and continuity	Develop a homelessness workforce stability and skills plan	Providers, commissioners	CCC, CPCA	Joint workforce plan, training, retention initiatives	12 months	Indirect alignment – enables delivery of national reforms	✕
Lived experience engagement is inconsistent and informal	Embed co-production as standard practice in commissioning and service design	All partners	Cambridge City Council	Formal framework, funded lived-experience roles	6 months	Strong alignment with new statutory expectations on lived experience	△
Governance is fragmented across multiple forums	Refresh homelessness governance to support the new Duty to Collaborate	Statutory partners	Cambridge City Council	Clear governance map, refreshed ToR, shared priorities	6 months	Direct alignment with national Duty to Collaborate and expectations for strong local governance	△
There's a lack of immigration/legal advice which puts additional strain on the wider system.	Commission additional immigration/legal advice services.	Partners, public	National government	Policy change and commissioning	12 months	National plan recognises legal advice and representation as a key tool in preventing and relieving homelessness; aligns with immigration advice pilot.	✕
Managing move-on into social housing requires improved information sharing and system collaboration	Launch a strategic forum to oversee management and direction of social housing in collaboration with local Housing Associations/RPs	Social housing providers, Housing associations	CCC, CPCA	Formal ToR; governance refresh	6-12 months	Aligns with expectations for system leadership and collaboration with the 'whole system' (incl. HAs)	△

Delivery | Test and Learn

***2021–2026 Strategy Alignment**
 ✓ = Already included / explicitly aligned
 △ = Partially included / implied
 ✕ = Not included

Key message	Recommendation	Audience	Owner	Delivery mechanism	Indicative timeline	Alignment with National 'Plan to End Homelessness'	2021–26 Strategy*
Prevention outcomes are inconsistent, particularly for singles and PRS cases	Pilot use of predictive analytics to identify and enable early intervention with high-risk households , focused on PRS sustainment and financial shocks	Housing Advice teams, partners	Cambridge City Council	Predictive analytics via LIFT, targeted PRS sustainment offers	Pilot 6–9 months; scale Year 2	Direct alignment with national priority on prevention and reducing inflow	✓
PRS is declining as a route out of homelessness and driving new demand	Test a refreshed PRS access model , with revised incentives, risk-sharing and clearer landlord offer	Private landlords, letting agents	Cambridge City Council	Enhanced Town Hall Lettings, revised incentives, targeted landlord engagement	12–18 months	Aligns with national focus on improving PRS access and security	✓
Rising acuity and unmet dual diagnosis needs are driving repeat homelessness	Pilot enhanced MDT and dual-diagnosis responses for priority singles and rough sleepers	NHS, housing, support providers	CPFT, ICB, Cambridge City Council	Expanded MDTs, clearer escalation routes, shared outcomes	6–12 months	Aligns with national emphasis on health–housing integration	△
Primary care access for people experiencing homelessness is patchy and poorly integrated	Pilot a primary care inclusion model linked to housing and outreach pathways	NHS partners, housing & support providers	Cambridgeshire & Peterborough ICB with Cambridge City Council	Outreach GP sessions, enhanced Access Surgery role, PCN-level agreements, shared referral protocols	6–12 months	Strong alignment with national priorities on health inclusion and rough sleeping reduction	△
Women, NRPF households and other “hidden” groups are under-represented in data and services	Test targeted pathways and improved data capture for under-served groups	Commissioners, VCS	Cambridge City Council with partners	Service pilots, improved recording, co-produced service design	12 months	Aligns with national focus on equity, inclusion and lived experience	△
Cambridge has a wealth of local assets and organisations (VCSE, University, Church)	Test and evaluate innovative solutions in collaboration with local assets/philanthropic institutions (e.g. the University) via the use of social impact bonds	Cambridge University	Cambridge City Council	Test and learn pilot; SIBs	12–18 months	Aligns with plan’s commitment to pilots, innovation and place-based responses .	✕

Delivery | Lived experience

*2021–2026 Strategy Alignment
 ✓ = Already included / explicitly aligned
 △ = Partially included / implied
 ✗ = Not included

Key message	Recommendation	Audience	Owner	Delivery mechanism	Indicative timeline	Alignment with National 'Plan to End Homelessness'	2021–26 Strategy*
Navigating systems while traumatised, unwell or unsafe is exhausting and retraumatising	Evaluate and develop a business case to expand the TAP model to a wider cohort.	Housing, health, DWP, VCSE	Cambridge City Council with partners	Small cohort pilot with named worker, warm handovers and advocacy remit	6–12 months	Aligns with national focus on joined-up services and reducing bureaucratic harm	✗
Debts and UC overpayments block move-on even when people are ready	Pilot debt-resolution pathways linked to housing outcomes (e.g. debt write-off, repayment pauses, advocacy)	Housing & welfare teams	Cambridge City Council, DWP partners	Targeted debt intervention fund with clear eligibility	12 months	Aligns with prevention and sustaining tenancies	✗
People avoid some services because they feel unsafe or overwhelmed	Pilot alternative, psychologically safe access points (women-only, substance-free, low-stimulus spaces)	Commissioners, providers	Cambridge City Council with VCSE	Targeted service pilots co-designed with lived experience	12 months	Aligns with national emphasis on equitable access and inclusion	△
Isolation in hostels and TA deepens mental distress	Test low-pressure social, volunteering and peer-led activities as core parts of homelessness support	Providers, VCSE	Cambridge City Council	Small grants, peer-led delivery, evaluation of wellbeing outcomes	6–12 months	Indirect alignment – supports recovery and non-recurrence	✗
Feeling unheard and decisions made “about me, not with me” undermines trust	Pilot strengthened communication standards (clear explanations, decision letters, two-way feedback)	Housing & support services	Cambridge City Council	Revised templates, staff training, lived-experience review panels	6 months	Aligns with national focus on dignity and person-centred services	✗



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REPORT TITLE: NEW SITES DEVELOPMENT AND HOMES ENGLAND UPDATE.

To: Cabinet July 2026

Lead Member: Gerri Bird, Cabinet Member for Housing

Report by:

Benedict Binns, Assistant Director, Development

Tel: 01223 450000 Email: ben.binns@cambridge.gov.uk

Wards affected:

East Chesterton, Trumpington, Cherry Hinton, Coleridge, Romsey

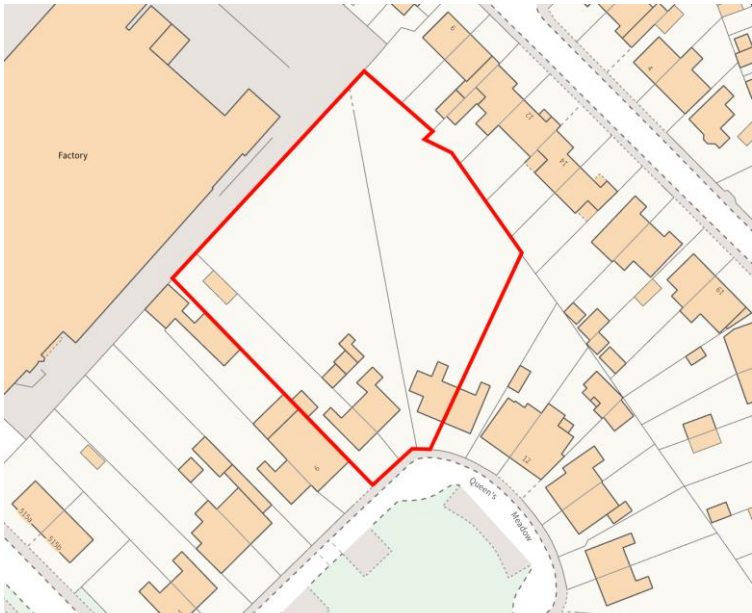
Director Approval: Director Lynne Miles confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to Cabinet for decision.

1	Recommendations
1.1	For the following sites, a. Queens Meadow Phase 2 b. The Hawthorns, Haviland Way c. Horizons It is recommended that Cabinet: I. Approve the three sites above for inclusion within the Housing Capital Programme, with an indicative capital budget of £37,401,454 to fund all site assembly, construction costs, professional fees, and further associated fees, to deliver a 100% affordable – council - housing scheme which meets the identified need in Cambridge. This budget will be funded from resources previously approved by Council for investment in new homes and not yet allocated. II. Authorise the Assistant Director, Development in consultation with the Cabinet Member for Housing to approve variations to the scheme including the number of units and mix of property types, sizes, and tenure. III. Delegate authority to the Assistant Director, Development to make a Compulsory Purchase Order (CPO) in respect of any leasehold interests at Horizons and Hawkins development sites, identified for possible redevelopment that cannot be acquired by private treaty within a reasonable timescale and at a reasonable cost subject to the Director of Economy and Place being satisfied that there is a compelling case in the public interest for the use of compulsory purchase powers, and that all legal and policy requirements for the making and confirmation of a CPO have been met IV. Delegate authority to the Assistant Director, Development to serve initial Demolition Notices under the Housing Act 1985. V. Delegate Authority to the Assistant Director of Housing and Homelessness to approve a local lettings plan for the proposed developments.
1.2	It is recommended that Cabinet: I. Notes the updates and next steps for the councils Small Sites Programme for the following sites: a. Kendal Way b. Paget Road c. St Thomas Road

2	Executive Summary
2.1	This report provides an update on the Council's Small Sites Programme; an initiative focused on bringing forward underutilised and infill sites across Cambridge to deliver new Council housing. This programme is designed to provide opportunities for the Small to Medium (SME) sector in the region particularly architects, consultants, and SME contractors. These proposals aim to deliver 100% affordable – council - homes including the provision of larger family homes and accessible accommodation, which remain in short supply locally. The total number of new council homes is 91 new homes a net gain of 88 predominantly 3 and 4 bed houses. With Homes England funding, the council will be able to offer more of the new council homes on the lowest level of council rent – ‘social rent,’ which is discounted to around 40-45% of market rents. The report outlines progress on three existing schemes (Kendal Way, Paget Road, and St Thomas Road) and seeks approval to progress three additional sites – Queen's Meadow Phase 2, The Hawthorns at Haviland Way, and the Horizons Community Centre site. The indicative combined budget for these proposals is £37.4 million drawn down from allocated budgets. All homes will be designed in line with the Cambridge Sustainable Housing Design Guide, supporting the Council's objectives on sustainability, energy efficiency, and tackling fuel poverty.

3	Background
3.1	This report details the progress of the Small Sites Programme with updates on three sites and seeks approval for a budget and delegated authority for three new sites which have been brought forward by the council's development team.
3.2	The council's Small Sites Programme is a direct delivery programme led by the council to identify and deliver housing on underutilised, infill, and smaller land parcels, typically on Council-owned land, to maximise affordable housing delivery. It is wholly separate from development opportunities progressed by Cambridge Investment Partnership, (CIP), the Council's 50-50 joint venture with The Hill Group Ltd and requires the procurement of consultants and contractors by the council to deliver the sites.
3.3	These proposals aim to deliver 100% affordable – council - homes including the provision of larger family homes and accessible accommodation, which remain in short supply locally. The total number of new council homes is 91 new homes a net gain of 88 predominantly 3 and 4 bed houses.
3.4	The homes in the six sites in this report form part of the council's Strategic Partnership bid with Homes England. In April, this year the council submitted a bid to Homes England to apply to become a Social and Affordable Housing Programme (SAHP) Strategic Partner. If successful, a Strategic Partnership would secure long-term, flexible funding of up to £96 million from Homes England to support us to achieve the council's target of 1,000 council homes by 2030 and exceed this to build 1,300 council homes by 2036. Applicants will know if their bid is successful in late summer this year.
3.5	The funding through a Strategic Partnership would also enable the council to offer more of the new council homes on the lowest level of council rent – 'social rent,' which is discounted to around 40-45% of market rents. All the schemes outlined in this report will therefore target 60% of homes at social rents and 40% at 80% affordable rent making the developments financially viable for the council with mixed and balanced communities.
3.6	If the council is not successful in obtaining a Strategic Partnership, it will still be able to bid for grant funding from Homes England on a scheme-by-scheme basis through the Continuous Market Engagement (CME) route. In the past, to help fund our housebuilding programme, the council have applied for government funding on a scheme-by-scheme basis – such as at East Barnwell, where we were awarded £7 million towards building 120 new council homes, replacing 18 ageing council flats on the site.

3.7	All schemes will be designed in accordance with the Cambridge Sustainable Housing Design Guide (2021), ensuring high standards of environmental performance, energy efficiency, and design quality. This will contribute to the Council's ambitions around climate change, including reducing carbon emissions and tackling fuel poverty.
3.8	With Homes England funding, the Small Sites Programme will unlock the housing potential of small sites in Cambridge and is targeting the delivery of at least 100 highly sustainable affordable homes across the city to provide a greater variety of homes in terms of tenure, type, size, and location. This programme is designed to provide opportunities for the SME sector in the region particularly architects, consultants, and SME contractors.
3.9	It is important to note that, except for those sites where planning permission has already been granted, the proposals set out in this report are indicative and represent early-stage development assumptions. Each scheme will be subject to further detailed feasibility work, design development, and viability assessment.
3.10	Comprehensive public consultation and stakeholder engagement will form a key part of the development process. This will include engagement with existing residents, local communities, and relevant stakeholders, as well as pre-application discussions with the Local Planning Authority. Feedback received through these processes will be used to inform and refine scheme proposals to ensure they are appropriate, deliverable, and responsive to local needs.
3.11	For those sites where planning permission has already been secured, such as Kendal Way and Paget Road, statutory consultation has been undertaken as part of the planning process. However, ongoing engagement will continue during the detailed design and delivery stages to keep stakeholders informed and address any emerging issues.
3.12	For schemes that are at an earlier stage of development, a comprehensive programme of engagement will be undertaken prior to the submission of any planning applications. This will include early-stage discussions with ward members, residents, and other key stakeholders to present initial proposals, gather feedback, and understand local priorities and concerns. Sites involving existing residential properties or changes to open space will require sensitive and proactive engagement to ensure that impacts are clearly communicated and appropriately mitigated.
3.13	Section 4 outlines the updates on the three approved sites and the approval requirements for budgets on three new sites.

4	Proposals
4.1	New sites have budgets that will be funded from resources previously approved by Council for investment in new homes and not yet allocated.
4.1.1	Queens Meadow Phase 2 The land at Queen's Meadow, Cherry Hinton, comprises three existing Council-owned homes which have very large gardens. The gardens will be combined to provide a single larger site, two of the properties will remain with smaller adequate gardens, and one property will be demolished to provide access. Two properties have been kept vacant for redevelopment; the third and final property has now also become vacant, enabling the scheme to progress. Proposals are to prioritise delivery of twelve 2, 3 and 4-bedroom homes, addressing a critical shortage of larger affordable homes within Cambridge. The total budget for the scheme is estimated to be £5,210,384 including site assembly, construction costs, professional fees, and further associated fees which will be drawn down from the sum already approved for investment in new homes and not yet allocated. No new budget requests are associated with this request for approval. The council is appointing a design team to proceed with the planning submission and in due course will appoint a contractor. 

4.1.2	Indicative programme <table border="1" data-bbox="256 309 1525 434"> <tr> <td data-bbox="256 309 887 349">Planning Submission</td><td data-bbox="887 309 1525 349">July 2027</td></tr> <tr> <td data-bbox="256 349 887 389">Start on Site</td><td data-bbox="887 349 1525 389">February 2028</td></tr> <tr> <td data-bbox="256 389 887 434">Practical Completion</td><td data-bbox="887 389 1525 434">July 2029</td></tr> </table>	Planning Submission	July 2027	Start on Site	February 2028	Practical Completion	July 2029
Planning Submission	July 2027						
Start on Site	February 2028						
Practical Completion	July 2029						
4.1.3	The Hawthorns, Haviland Way This land at Haviland Way is in King's Hedges. The Council has reached agreement with the County Council to acquire this land subject to due diligence and contract for £1,125,000 plus on costs. Subject to approval and following legal purchase, development proposals will commence to consider optimum capacities and housing mixes. The site is expected to deliver up to 30 council homes and could form part of a wider approach to regeneration as part of the North Cambridge Framework for change. There are no decanting requirements for this site and officers are seeking approval for a budget of £13,797,945 including site assembly, construction costs, professional fees and further associated fees which will be drawn down from the sum already approved for investment in new homes and not yet allocated. No new budget requests are associated with this request for approval. At this stage delegated authority is requested so that officers can either add this to a wider CIP proposal being developed at Arbury Court or if more appropriate to be added to the Small Sites Programme. If part of the Small Sites Programme the council will appoint a design team to proceed with the planning submission and in due course will appoint a contractor. 						

4.1.4	Indicative programme	
	Planning Submission	July 2027
	Start on Site	February 2028
	Practical Completion	August 2029
4.1.5	Horizon Resource Centre, Coldhams Lane The Horizons Community Centre in Romsey is owned and operated by the County Council and provides services for people with learning difficulties. The current site includes a substantial building footprint along with associated facilities such as multiple car parks and open space. Both the service occupier and the County Council are seeking a more modern, energy-efficient facility. This could potentially be delivered through a redeveloped mixed-use scheme on the existing Horizons site, which remains a suitable location for the service, or through relocation to an alternative site. Both options will be explored to determine the most appropriate solution. Redevelopment of the current site presents an opportunity to optimise land use while continuing to meet service needs, with initial considerations suggesting capacity for new housing alongside a replacement community facility. While the site is currently owned by the County Council, a collaborative approach is being taken to ensure the best long-term outcome, particularly in the context of potential local government reorganisation. If Local Government Review does not proceed, alternative leasing arrangements will be considered. Officers are seeking approval for a budget of £18,402,720 which will be drawn down from the sum already approved for investment in new homes and not yet allocated. This excludes the decanting costs due to the relocation of the community centre. At this stage delegated authority is requested so that officers can either add this to a wider CIP programme or if more appropriate to be added to the Small Sites Programme. If part of the Small Sites Programme the council will appoint a design team to proceed with the planning submission and in due course will appoint a contractor.	

4.1.6							
4.1.7	Indicative programme <table border="1" data-bbox="256 869 1528 992"> <tr> <td>Planning Submission</td><td>July 2027</td></tr> <tr> <td>Start on Site</td><td>February 2028</td></tr> <tr> <td>Practical Completion</td><td>February 2030</td></tr> </table>	Planning Submission	July 2027	Start on Site	February 2028	Practical Completion	February 2030
Planning Submission	July 2027						
Start on Site	February 2028						
Practical Completion	February 2030						
4.2	Approved schemes – an update Budgets are already drawn down and been approved by previous committees. All budgets will be updated in line with the budget setting procedures.						
4.2.1	Kendal Way This single 3-bedroom, 5-person, single-storey wheelchair-accessible council home in East Chesterton was approved at Planning Committee on 1st February 2017 and planning permission was granted on 20th June 2022. A section of the foundation has already been constructed to preserve the planning consent prior to its expiry in June 2025. The council is appointing a contractor to proceed with the build. This development is currently within the budget parameters.						
4.2.2	Paget Road This development of four 3-bedroom, 5-person council houses at Paget Road in Trumpington was approved at Planning Committee on 23rd September 2021 and planning permission was granted on 14th August 2024. At least three of these council homes will be at social rent. The council is appointing a contractor to proceed with the build. This development is currently within the budget parameters.						

4.2.3	St Thomas Road This development of eleven homes at St Thomas's, Coleridge, was paused. The council is now reviewing whether a smaller development of no more than four 3 and 4 bed council homes with biodiversity enhancements to the park is possible. At least three of these council homes will be at social rent. Proposals for these council houses will review what is possible in utilising the garage space area only and to minimise impacts on the park. The team will work with local residents to ensure that any changes to the green space are clearly agreed before designs are progressed to planning. Officers will also look at how the space can be adopted as a park as part of the council's portfolio. The council has already made some biodiversity improvements to the park including the planting of new trees and the team will work with the council's biodiversity officer to look at further improvements. This project will also include working with local residents to improve the playground area looking at the flooring and what other enhancements could be made. The council is appointing a design team to review designs and, if agreed, will proceed with the planning submission and in due course will appoint a contractor. This development is currently within the budget parameters.

4.3	Consultation and Engagement
4.3.1	Engagement with directly affected residents will be particularly important for schemes where development proposals involve the demolition of an existing vacant property to enable access. In such cases, residents will be engaged on an individual and collective basis to ensure that their views are considered and that any agreed changes are transparently managed. Similarly, for sites involving existing uses, such as the Horizons community facility, engagement will be undertaken with service users, operators, and partner organisations to support the successful relocation of services to improved accommodation with the minimum possible disruption to services. All schemes will also be subject to pre-application consultation with the Local Planning Authority, allowing design proposals to be reviewed and refined prior to formal submission. This process helps to identify and address planning considerations at an early stage, reducing risk and improving the quality and deliverability of the final proposals. Public consultation exercises, which may include exhibitions, online engagement, and targeted communications, will be undertaken in line with best practice and the Council's adopted consultation protocols. The feedback gathered through these engagement activities will be carefully considered and used to inform the evolution of each scheme. Where appropriate, proposals will be amended to respond to stakeholder input, while maintaining the overall objective of delivering high-quality, affordable homes. This iterative approach ensures that development is both community-informed and aligned with the Council's broader strategic priorities, supporting more successful and sustainable outcomes

5	Corporate Plan.
5.1	The Corporate Plan for 2022-2027 sets out 4 key priorities. I. Leading Cambridge's response to the climate and biodiversity emergencies and creating a net zero council by 2030; II. Tackling poverty and inequality and helping people in the greatest need; III. Building a new generation of council and affordable homes and reducing homelessness; IV. Modernising the council to lead a greener city that is fair for all
5.2	In response to this all sites in this report pave the way for: I. A more sustainable built environment – both residential and commercial buildings II. Investment in an area which includes some of the most deprived LSOAs in Cambridge III. Building new council homes

6	Implications			
6.1	Relevant risks			
6.1.1	Risk description	Severity (1 = little, 5 = huge)	Likelihood (1= low, 5= high)	Mitigation
	Planning refusal or delays for early-stage schemes	5	2	Early engagement with the Local Planning Authority; pre-application submissions; iterative design development to ensure policy compliance
	Construction cost inflation and market volatility	2	4	Robust cost planning; contingency allowances; market testing; use of framework contractors where appropriate; regular viability reviews
	Land acquisition delays or failure	5	3	Ongoing negotiations; due diligence; clear legal agreements; alternative options considered if required
	Stakeholder / resident objections, particularly where open space or gardens are affected	3	3	Early and transparent engagement; consultation events; design amendments to respond to concerns; clear communication strategy
	Programme delays due to procurement or contractor availability	3	3	Forward procurement planning; use of established frameworks; realistic programme scheduling; active contract management
	Site constraints (e.g. access, ground conditions, demolition complexity)	2	3	Detailed site investigations; feasibility studies; contingency budgeting; specialist technical input
	Risks associated with relocation of existing uses	4	2	Close partnership working; clear relocation strategy; funding and programme alignment; stakeholder engagement
	Financial viability pressures impacting deliverability	5	2	Regular financial review; securing grant funding (Homes England); exploring additional funding streams; phased approvals
	Impact on residents during construction	2	4	Construction management plans; communication with residents; restricted working hours; contractor performance monitoring
	Programme-level coordination risks across multiple sites	3	3	Strong programme governance; regular monitoring and reporting; resource planning across the Small Sites Programme

6.3	Financial Implications
6.3.1	The financial implications of the proposed schemes are currently being assessed and will be subject to more detailed appraisal as each site progresses through the development pipeline. At this stage, indicative cost estimates are being developed, considering site-specific factors such as demolition requirements, infrastructure provision, abnormal ground conditions, and access arrangements. These early assumptions will be refined through feasibility design work, procurement, and market testing to ensure that each scheme is deliverable and represents value for money. For sites requiring relocation of existing uses, such as the Horizons community facility, the cost of reprovision will need to be incorporated into overall financial planning. It is recognised that the schemes set out in this report are at varying stages of development, and as such, financial assumptions remain indicative at this stage. All proposals will therefore be subject to ongoing review, including detailed viability assessments, cost planning, and risk analysis as designs evolve. If required, further reports will be brought back to members where required to seek approval of scheme-specific budgets, funding allocations, and procurement routes. This staged approach ensures robust financial governance while enabling the Council to progress a pipeline of deliverable schemes that support its strategic housing ambitions.
6.3.2	For sites developed by CIP, development costs are established through Hill's tendering of sub-contractors and supply chain packages, with the final contract sum incorporating construction costs, preliminaries, fees, and agreed overheads and profit. The Council's investment is typically funded through the Housing Revenue Account (HRA), with costs and risks shared in accordance with the partnership agreement. CIP delivery benefits from established procurement routes, market expertise, and economies of scale, providing cost certainty and programme efficiencies. In addition, schemes delivered through CIP are subject to independent scrutiny, including Value for Money assessments by the Employer's Agent, ensuring that the Council's investment achieves competitive pricing and aligns with its financial and strategic objectives.
6.4	Legal Implications
6.5	Where proposals may affect residential tenants, leaseholders, and other property owners. The Council seeks advice on these issues on a regular basis. At this stage proposals will be very high level and the Council see seek to ensure that the process and any proposals are effectively communicated and that there are consultation opportunities.

6.5.1	The Council's approach to the Horizons site is to work in a pragmatic and collaborative manner with partners, recognising the wider context of forthcoming Local Government Reform. This includes maintaining constructive dialogue with Cambridgeshire County Council to identify the most appropriate and deliverable solution for the site and the relocation of existing services. At the same time, the Council will continue to take appropriate legal and professional advice to ensure that any proposals, agreements, and delivery arrangements are robust, compliant, and in the best interests of residents and service users.
6.6	Equalities and Socio-economic Implications
6.6.1	The proposed programme of development has been shaped with careful consideration of the Council's obligations under the Equality Act 2010 and its wider commitment to promoting equality, diversity, and inclusion. The Small Sites Programme is expected to deliver cumulative equality benefits, particularly through the consistent provision of 100% affordable housing across multiple locations in the city. A key equality benefit of the programme is the provision of a broader range of housing types that respond to identified gaps in existing stock. This includes the delivery of larger family homes which will help meet the needs of larger households who are currently underserved. The provision of appropriately sized homes will contribute to improved living conditions, health outcomes, and overall wellbeing.
6.6.2	In addition, the inclusion of accessible and adaptable housing - such as the wheelchair-accessible dwelling proposed at Kendal Way - will directly support residents with disabilities or mobility impairments. Ensuring that new homes are designed to a high standard of accessibility is integral to enabling independent living and reducing barriers to suitable accommodation. Across all schemes, the Council will seek to apply inclusive design principles in line with adopted policies and design guidance, improving usability for a wide range of residents, including older people and those with additional needs
6.6.3	The programme also has the potential to deliver positive impacts in relation to fuel poverty and health inequalities. By adhering to the Cambridge Sustainable Housing Design Guide (2021), the new homes will achieve high standards of energy efficiency and environmental performance. This will support lower energy costs for tenants, reduce exposure to cold or poorly heated homes, and contribute to improved physical and mental health outcomes, particularly for vulnerable households.

6.6.4	At the same time, it is recognised that some schemes may give rise to localised impacts, particularly where development involves changes to existing open space, garage areas. There may also be impacts on residents during the construction phase. These effects will be carefully considered and mitigated through design, engagement, and construction management processes. Specific attention will be given to ensuring that vulnerable or affected groups are appropriately supported and that any disruption is minimised.
6.6.5	An Equality Impact Assessment (EqIA) will be undertaken and maintained for each scheme as it progresses, allowing for a detailed understanding of both positive and negative impacts on different groups. This will inform decision-making throughout the development process, ensuring that equality considerations remain central to scheme design, delivery, and occupation.
6.7	Climate Change and Environmental Implications
6.7.1	The design ambition is to deliver all affordable units on the scheme to low energy standards close to Passivhaus levels of sustainability performance and to be gas free. There are also sustainability targets for water, biodiversity, car park ratios which are all significant improvements on the current Local Plan. This will follow principles of the updated Sustainable Housing Design Guide (SHDG) which was approved at January 2024 HSC.

6.7.2

The sustainability targets for the affordable portion of these sites are set out on the matrix below. The majority of the schemes are at design stage, and the actual performance of the buildings/details will be developed over time against this aspiration. There may be financial, viability or technical constraints which will mean the exact targets set out cannot be met; they may also be exceeded.

SHDG Range of Targets		This Development targets
	Local Plan	Passivhaus or equivalent level of sustainability
Units		120
PHPP kWh/m ²	N/A	Annual Space Heating Demand up to 40 – Cam Standard Primary Energy Renewable (PER) demand between 60-75 – Cam Standard (or project specific if high-density)
Water l/d	110	90
Biodiversity Net gain	10%	20%
Car Parking ratios across schemes	N/A	<0.5 per affordable dwelling
Are there technical constraints?	PHPP: This scheme will aim to deliver Cam Standard	
	Water: The target is 90lppd but the detailed design to deliver this has not yet been developed.	
	Biodiversity: A 20% improvement is being targeted	
	Car Parking: Car parking provision for residential is below 0.5	
Are there financial constraints	Estimated costs have included a cost allowance for Passivhaus or equivalent standards and not certification	
Recommended Sustainability Target	Cam Standard	
Additional measures included to meet Net Zero Carbon in the future	Future proofing - Measures in future are likely to include Solar PV and battery storage	

6.8	Procurement Implications
6.8.1	Consultants will be procured and commissioned by the council, or CIP where relevant within our existing procurement procedures. For schemes delivered through the Cambridge Investment Partnership (CIP), procurement is led by Hill as development partner. Hill undertakes the competitive tendering of sub-contractors and consultant packages, which forms the basis of the overall construction cost. Sub-contractor tenders are used to build up a detailed Contract Sum Analysis, to which Hill adds further cost components including preliminaries, provisional sums, and allowances for overheads, profit, and management fees. Following completion of the tendering process, Hill undertakes a cost settlement exercise to agree the final contract sum. This is independently reviewed by the Employer's Agent, who prepares a Value for Money assessment to ensure the proposed costs are robust, competitive, and represent good value for the Council. For schemes delivered outside of CIP, the Council adopts a traditional main contractor procurement route. This begins with a pre-tender stage, where selected contractors are invited to submit Pre-Tender Enquiries, including pre-qualification information where required. Following evaluation, a final tender list is agreed, and a comprehensive tender pack is issued by the Employer's Agent, including contract documentation, employer's requirements, and technical design information. The tender period typically runs for four to eight weeks, during which clarifications are managed to ensure a fair and transparent process. Returned tenders are rigorously assessed by the Employer's Agent, who prepares a detailed tender report including cost analysis, risk assessment, and a recommendation for contractor appointment. Subject to Council approval, a preferred bidder is selected, the contract is finalised following a standstill and negotiation period, and formal contract award is undertaken in accordance with procurement regulations.
6.9	Community Safety Implications

6.9.1	Secured by Design is a standard approach used to ensure that design of new homes does, as far as possible, mitigate against crime and anti-social behaviour. New developments are designed out crime by working to Secure by Design standards. This means that designs are checked by experts from the police service to make sure that safety and security of residents is considered in the schemes, and any adjustments to improve these are made accordingly. Safety and Security improvements to the estate will include: I. Increased overlooking II. Better lighting III. Internal, secure bike parking IV. Improved security of properties V. Improved fire safety measures, such as sprinklers to all residential dwellings VI. Reduced carbon emissions per property VII. Focus on sustainable transport
7	Background documents
7.1	HSC 23 September 2021: Report on Net Zero Carbon Pilot Schemes at Paget Road and St Thomas Road HSC 19 January 2020: Update on the Programme to Build New Council Homes Funded through the Combined Authority (Kendal Way) HSC 21 October 2025: North Cambridge Framework for Change
8	Appendices
8.1	Not applicable
	To inspect the background papers or if you have a query on the report please contact: Benedict Binns Ben.binns@cambridge.gov.uk

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Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Small Sites Programme

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
https://www.cambridge.gov.uk/housing-development
https://www.cambridge.gov.uk/affordable-housing-programme

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
Proposed redevelopment of 120 homes across Cambridge
Redevelopment of these sites is part of the council's programme of work across Cambridge to improve accommodation standards for people living in existing council homes; to build additional council homes to meet local need; and to address wider housing supply issues, including much-needed larger family homes.

4. Responsible service
Cambridge City Council's Housing Development Agency (HDA)

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick all that apply)	☒ Residents ☒ Visitors ☒ Staff
Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here): • The residents of the surrounding properties that are adjacent to the development sites • Housing applicants registered on Home-Link (the Council's choice-based lettings system) i.e. households who need to find somewhere to live. • Existing council tenants, leaseholders and any subtenants in the existing units. The 1996 Housing Act as amended by the 2017 Homelessness Reduction Act determines the categories of homeless applicants which the council owes a 'main' statutory housing duty to. The council must make suitable accommodation available to applicants it owes a 'main' housing duty to. These categories include 16/17 year olds, young people leaving care, older people, those with physical or learning disabilities, mental health issues, victims of domestic abuse. In relation to the Equalities impact, many of those on the housing register (particularly those on the highest banding for need) will have a level of vulnerability. Although not all vulnerabilities are captured under the Equality Act 2010, many will be, such as disability (including mental health), age, pregnancy and maternity. By adding to the general housing stock within the City, housing opportunities are also increased for staff seeking to relocate.	

6. What type of strategy, policy, plan, project, contract or major change to your service is this?	☐ New ☒ Major change ☐ Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)	☒ Yes ☐ No
If 'Yes' please provide details below:	

- Housing Management – consulting with the existing residents and managing the new homes
- Estates & Facilities – reviewing options to retrofit some retained homes and maintaining the new homes
- Housing strategy – informing the need for tenure mix and specialist or adapted housing
- Finance Team - to provide funding for every aspect of developing the new homes from initial surveys to construction, all in line with projected cash flow and agreed budget
- Streets and Open Spaces - advice and input on the design of new open spaces and equipment provided as part of the new homes, subsequent maintenance
- Safer communities – providing advice on the design of the new schemes and homes from a community safety and designing out crime perspective
- Health & safety – commentary on the design of new schemes and homes from a personal safety, fire safety and usability perspective
- 3Cs Legal Services – assisting with the buy back purchases of the leasehold and freehold properties and dealing with land title and transfer to facilitate development
- CCC parking services – collaboration in re-provision of parking facilities where affected by the development
- Cambridge Investment Partnership (CIP) - a joint venture partnership between CCC and Hill Partnerships to assist in the delivery of the Councils Affordable home goals.

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

No.

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

The HDA has undertaken a detailed internal review process toward identifying council stock which has known shortcomings, and which may most appropriately be redeveloped to provide new energy efficient housing and community facilities.

Officers from Housing Service and Housing strategy have additionally been consulted to identify a target unit delivery mix for the overall housing programme which best serves forecast demand across the city. Individual consultation with Housing is further conducted on a scheme-by-scheme basis and data is included by the HDA for scheme reports to the Strategy and Resources or Housing Scrutiny Committees. The data records the numbers of those on CCC waiting list as provided quarterly by Housing strategy. Further information on housing need and strategy can be found as follows:
www.cambridge.gov.uk/housing-research

[Albert Kennedy institute \(2014\), LGBT Youth Homelessness: A UK scoping of cause, prevalence, response, and outcome](#)

[Runnymede Trust \(2020\), The Colour of Money](#)

[Social Metrics Commission \(2020\), Measuring Poverty](#)

[Stonewall \(2016\), Building Safe Choices: LGBT housing futures](#)

[Stonewall \(2018\), LGBT in Britain: Trans Report](#)

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

Housing Register and Homelessness

The 1996 Housing Act as amended by the 2017 Homelessness Reduction Act determines the categories of people that are considered as priority need for social housing including because of their age, including older people, those with children, people aged 16 or 17, and care leavers aged 18 to 20. Further provision of social housing in Cambridge will have a positive impact for these groups.

Older People

The units to be delivered in this scheme proposal are made up of general needs accommodation and 5% of the affordable units are to be adapted homes suitable for wheelchair users M(4)3 standard. All remaining general needs housing is provided at adaptable M(4)2 standard.

The provision of new homes which are accessible for household members who are wheelchair users will mean these homes will be suitable for older people with reduced mobility as long as their needs require this type of home.

The provision of housing for older people in the city is generally good, and housing for older people is not generally in short supply. An older applicant on the housing needs register can apply both for specialist housing, which excludes other types of applicant, and for general needs housing as not all older people want to live in specialist housing.

Younger people

The homes on these proposed schemes will be a mix of 1, 2, 3 and 4 bedroom homes. Young people with a need for this type of accommodation will be eligible to bid for these homes.

Cambridge has a relatively young population compared to the rest of Cambridgeshire and many other parts of the country. Around 35% of the population is aged 20-34.

Younger people are finding it increasingly difficult to get on the housing ladder, having to remain longer with parents or in expensive private rented accommodation. For example, England as a whole has seen a significant increase in the proportion of younger households in the private rented sector over the last ten years. In 2004/05, 24% of those aged 25-34 lived in the private rented sector; by 2014-15 this had increased to 46%. (English Housing Survey 2014-15)

Affordability issues are particularly acute in Cambridge, with an average price of £415,000 paid by first-time buyers (Office of National Statistics – February 2024). Private rents are also significantly higher than most other parts of the country, with the average rent of over £1,600 (Office of National Statistics - March 2024).

Increasing the supply of general needs Council housing through this programme will:

- Increase the supply of affordable homes in the city of Cambridge, enabling the council to provide a competitive accommodation option for younger people on low incomes;
- Ensure that the Council can provide accommodation to young people in acute housing need caused by homelessness or economic deprivation.

(b) Disability

5% of the units to be delivered in this scheme proposal will be to M(4)3 standard suitable for wheelchair users. All general needs housing is adaptable M(4)2 standard.

The HDA will remain actively engaged with Adaptations Officers, the Housing Advice Coordinator and other relevant partners to ensure that the new schemes deliver housing that is suitably adapted or adaptable.

Demarcated disabled parking will be provided at appropriate locations to serve tenants and service users, in line with planning guidance.

Almost one in five people in the UK have a disability, with mobility being the most common impairment. At the same time there is a nationally recognised shortage of housing for people with disabilities. For example: around 2% of the UK population are wheelchair users, yet 84% of homes in England do not allow someone using a wheelchair to enter their home through their front door without difficulty. Around 15% of households containing at least one wheelchair user feel that their current home is not suitable for their needs, and so requires adaptations.

Around 22% of individuals living in social housing in Cambridge have a long-term health problem or disability.

Disabled people tend to have lower incomes and are twice as likely as non-disabled people to be social housing tenants.

Around 16% of the national population has a common mental health disorder, and professionals nationally and locally are reporting an increase in the number of service users with mental health issues. For example: increasing numbers of rough sleepers with mental health problems, many of whom also have alcohol and substance misuse issues; and an increase in numbers of older people with dementia.

To ensure that all parties are fully informed and to cater for specific needs, all correspondence and information is made available to residents in varied formats when required.

(c) Gender reassignment

Increasing the supply of affordable housing in Cambridge is expected to have a positive impact on those members of the community with the protected characteristic of gender reassignment.

According to research undertaken by LGBT+ charity Stonewall for their 2018 publication [LGBT in Britain - Trans Report](#), trans people commonly face a range of barriers to housing. One in four trans people have experienced homelessness at some point in their lives, with a similar proportion having also faced discrimination when searching for housing in the preceding year. One in five non-binary people has also faced discrimination when looking for a new home.

By providing more general needs housing, the Council is in a stronger position to ensure that any residents, trans, non-binary or otherwise, who are facing homelessness will be able to find affordable accommodation through the Council. Similarly, applicants who are facing abuse in their current home environment will be able to apply for a wider range of housing options with the council. As with other equality groups, an increase in the Council housing supply will provide more Cambridge residents

with the option of applying to the Council, rather than relying on inconsistent practices within the private sector.

Improving the local community facilities; including community centre, open spaces, and recreation facilities will have a positive impact. These spaces will provide opportunity for community groups to meet and socialise.

(d) Marriage and civil partnership

We have not identified any equalities issues specific to this protected characteristic in relation to need in the affordable housing development programme.

(e) Pregnancy and maternity

2, 3 and 4 bedroom homes will be provided on these developments. These will be available to bid on by women who are pregnant (24 weeks or more) or who have recently had children meaning they need to move to larger accommodation. Private and shared amenity space will be provided alongside the housing and community facilities. Improving the local community facilities; including the community centre, open spaces, and recreation facilities will have a positive impact. These spaces will provide opportunity for community groups to meet and socialise.

National policy dictates that certain groups of people are considered as priority need for social housing because they are more likely to be vulnerable, including women who are pregnant. Extra support from Council officers will be offered to those that are affected by the redevelopment. Further provision of social housing in Cambridge will have a positive impact for these groups.

As with other protected characteristics, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying on high rents in the private sector, which impact families with young children particularly severely.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Increasing the supply of affordable housing in Cambridge is expected to have a positive impact on those members of the community who are classified as Black and Minority Ethnic (BAME).

According to the annual Measuring Poverty report published by the Social Metrics Commission, 46% households in the UK where the head of the household is BAME are classified as living in poverty, compared with 19% where the head of the household is white. People in BAME families are also between 2-3 times more likely to be living in persistent poverty than white families. According to The Colour of Money (2020) for Indians the rate of poverty is 22%, for Mixed its 28%; Chinese 29%; Bangladeshi 45% and Pakistani 46%. This is due to lower wages, higher unemployment, higher rates of part-time working, higher housing costs, and slightly larger household size. It follows that BAME households are likely to have a greater need overall for a range of affordable housing options in the site though the need varies by ethnic group. In Cambridge, anecdotally according to voluntary and community sector groups, Bangladeshi people are especially likely to experience poverty.

Increasing the supply of general needs housing in Cambridge should therefore have a proportionate impact on housing options for BAME families in the city. As with other protected characteristics, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying solely on high rents in the private sector.

The Council makes information available to residents in other languages where it's needed.

(g) Religion or belief

We have not identified any equalities issues specific to this protected characteristic in relation to the affordable housing development programme. Designs and specifications can however be enhanced to accommodate cultural preferences if instructed to do so by the relevant Housing Authority (for example facilitating spray taps adjacent to WCs).

The community centre to be reprovided may be used by different faith groups however consultation with local groups will continue and the need for this has not yet been identified.

(h) Sex

No specific issues have been identified in relation to sex, although it is worth noting that most of those fleeing domestic abuse for whom we have a statutory responsibility will be women. In domestic abuse cases the location where people are housed can be an important factor, for example away from the perpetrator or near to a family support network.

(i) Sexual orientation

Increasing the supply of affordable housing in Cambridge is expected to have a positive impact on LGBT+ members of the community.

LGBT people face unique pressures within the housing system at present. [Current research](#) from the Albert Kennedy institute indicates that within the youth homeless population, LGBT people are greatly over-represented. Young LGBT people who are homeless are likely to have a reduced support network as a high proportion (62-69%) have become homeless due to parental rejection or family abuse.

Comparable conditions prevail among older LGBT people according to [research undertaken](#) by Stonewall Housing, with many older persons having a history of homelessness and a smaller family support network than non-LGBT older people. Older LGBT people are also more likely to live alone.

Overall, there is a similar trend among the LGBT population where the limited options of Cambridge residents more generally are likely to be further reduced or placed under greater pressure by sexual orientation.

As with other protected characteristics, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying on high rents in the private sector, which is likely to have a higher impact on LGBT people.

- (j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:
- Low-income groups or those experiencing the impacts of poverty
 - Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_159kt25q).

Homelessness – positive impact

The 1996 Housing Act as amended by the 2017 Homelessness Reduction Act provides that the council has a duty to agree reasonable steps to try and prevent or relieve the homelessness of the those that are threatened with homelessness or homeless. A reasonable step under the Act could include advice and assistance with applying for social housing.

The development of new family sized homes on these schemes will allow homeless families currently living in temporary accommodation to have the opportunity to bid on the homes and secure a move to permanent accommodation.

Low-income groups or those experiencing the impacts of poverty– positive impact

Households living on low incomes come under greater housing pressure than those on higher incomes due to a range of factors. This has been discussed at length elsewhere in the document, but the primary driver behind the affordable housing programme remains the strictly limited housing options to which Cambridge residents on low incomes have access. Cambridge remains one of the most expensive places in the UK to live and an increase in the Council housing supply will provide more options for residents who choose to live in the city and will ensure that it is easier to build a mixed and balanced community within the city,

As can be seen elsewhere in this EQIA, the inequality in the housing market affects some groups more than others, but in all circumstances an increase in general needs Council housing will improve housing options across the board.

Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage – positive impact

Home-link prioritises applicants based on a variety needs criteria as set out in the council lettings policy and inclusive of consideration of protected characteristics. Priority banding within which prospective tenants will be informed by the full number of protected characteristics of the bidder, prioritising successful housing of the most at-risk groups. While the lettings policy does not specifically note prioritisation of need based on more than one protected characteristic, it does make allowance for the movement of applicants with multiple needs into higher priority banding for housing.

Fuel Poverty

The Council is committed to providing high quality homes which greatly supersede the energy efficiency of current housing stock. These schemes propose the delivery into council stock of homes meeting Cam Standard performance standards. These will provide low running costs and greater alleviation to residents affected by fuel poverty.

Changes to the local commercial facilities

Through redevelopment of this area, the commercial units will be demolished and re-provided. The Council is consulting with the business owners to establish their plans going forward. They may wish to remain on the new development and if so, the team will work on a strategy to maintain business continuity throughout the construction process. For example, at Colville 3 in Cherry Hinton, temporary units have been used to offer a space for several businesses until they can move into their new units. The development team will need to establish what options are available to the business owners when the phasing programme is created.

Any new commercial uses of the development must be of benefit to the community. The local demographic should be considered in terms of affordability, accessibility and inclusion.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqlA accordingly.)

A Housing Advice Coordinator, Adaptations Officer and other relevant partners will be consulted through design and building process to ensure the needs of those applicants in need on the housing register, in particular applicants that have disabilities, are considered.

This EqlA will be updated to reflect any additionally identified equalities implications on existing residents following further consultation activities. Detailed resident consultation will be assisted by internal council services, with methods tailored to the resident requirements, ie use of translation services where required, use of digital and non-digital materials, in person and/or telephonic or written correspondence as most appropriate to the consultee.

12. Do you have any additional comments?

None

13. Sign off

Name and job title of lead officer for this equality impact assessment: Connor Gilyatt, Project Manager

Other team members consulted: [Click here to enter text.](#)

All EqlAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer. Ctrl + click on the button below to send this (you will need to attach the form to the email):

Send form

CAMBRIDGE CITY COUNCIL CLIMATE CHANGE RATING TOOL

The spreadsheet on the next tab has been designed to help you consider the climate change implications of a committee decision, capital project or budget bid. All project committee reports, business cases and budget bids require a climate change rating.

When rating the climate change implications of your project/ proposal (column E), there are two issues to consider:

1. Will the project result in an increase/decrease in emissions of greenhouse gases/carbon dioxide?:

* Reduce the overall amount of energy being used / waste being produced/ emissions due to transport?	➡	POSITIVE IMPACT
* Increase the overall amount of energy being used / waste being produced/ emissions due to transport	➡	NEGATIVE IMPACT
* Have no effect on the amount of energy being used/ waste being produced/ emissions due to transport?	➡	NIL IMPACT

2. Will the project impact on the resilience of the community, the Council or its service users to the impacts of a changing climate?:

* Increase the ability of Cambridge City & its residents to withstand the effects of climate change?	➡	POSITIVE IMPACT
* Reduce the ability of Cambridge City & its residents to withstand the effects of climate change?	➡	NEGATIVE IMPACT
* Have no effect on the ability of Cambridge City & its residents to the withstand the effects of climate change?	➡	NIL IMPACT

The tool requires you to consider these issues with reference to **10 different criteria** e.g.: Energy Use; Waste Generation; Heatwaves; Flooding, etc.

Not all of these criteria will necessarily be relevant to your project/ proposal. Where a specific criteria is not relevant to your project/ proposal, assign a 'Nil' rating.

Where you identify either a positive or a negative impact, you are required to assess whether this impact will be High, Medium or Low.

There is some guidance on the next tab to help you distinguish between High, Medium and Low impacts.

You will also need to indicate the following:

- * Will the project move Cambridge City Council closer to the objective of a net zero carbon Cambridge by 2030? (Section 1, Column F)
i.e. will it reduce emissions from the Council's corporate buildings (including swimming pools, office buildings, car parks, sheltered housing schemes, community centres, arts venues and the crematorium) our fleet vehicles (including vans, trucks and refuse vehicles) or business travel?
- * Will the project move the city closer to the objective of a net zero carbon Cambridge by 2030? (Section 1, Column G)
- * What actions will be taken to avoid, mitigate or compensate for the negative impacts and maximise positive impacts? (Column I)
- * Will the project make Cambridge City Council and/or service users (particularly vulnerable service users) more resilient to future climate change impacts? (Section 2, Column F)
- * Will the project make Cambridge and/or service users (particularly vulnerable service users) more resilient to future climate change impacts? (Section 2, Column G)
- * Has a net zero option been considered? Please provide details (Column J)

Results:

Once you have applied a rating to each of the 10 assessment criteria, **you decide the overall rating your project/ proposal should have.**

If your project has negative as well as positive impacts, you decide what the overall rating should be by weighing the positive and negative impacts, but you must explain how the overall rating given to your project/ proposal has been derived.

It is also compulsory to highlight any negative environmental impacts your project may have, which may have been 'masked' by the overall rating.

Please do this in the commentary box below your rating.

Tips:

1. Concentrate on the most significant issues - there is the potential to consider the appraisal in a very detailed way. This should be avoided at this stage.
2. Where you have identified a negative impact, think about how you are going to manage or mitigate this impact and explain this in your report.

If you require assistance in completing the Rating Tool, please email sustainablecity@cambridge.gov.uk

Once you have completed the tool - please email it to sustainablecity@cambridge.gov.uk

Further information on how to complete the tool, and suggestions for actions that could be taken to avoid, mitigate or compensate for negative impacts - see the guidance document on this CityNet page.

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1. IMPACT ON CARBON EMISSIONS (MITIGATION OF CLIMATE CHANGE)									
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE FOLLOWING KEY AREAS:		WHAT IS THE IMPACT CONSIDERED TO BE? <i>See guidance in the purple box, below, to help you assess the degree of the negative and positive impacts e.g. High, Medium or Low</i>		CLIMATE CHANGE RATING: <i>Use drop down list</i>	WILL THE PROJECT MOVE CAMBRIDGE CITY COUNCIL CLOSER TO THE OBJECTIVE OF BEING NET ZERO CARBON BY 2030? <i>Use drop down list</i>	WILL THE PROJECT MOVE THE CITY CLOSER TO THE OBJECTIVE OF A NET ZERO CARBON CAMBRIDGE BY 2030? <i>Use drop down list</i>	PLEASE DETAIL HERE THE ACTION THAT WILL BE TAKEN TO AVOID, MITIGATE OR COMPENSATE FOR THE NEGATIVE IMPACTS AND MAXIMISE POSITIVE IMPACTS?		HAS A NET ZERO CARBON OPTION BEEN CONSIDERED? PLEASE PROVIDE DETAILS.
1	ENERGY USE	Positive Impact:	Energy use will be reduced or renewable energy will be used	Medium Positive	Yes	Yes	Consider: - Reducing demand for energy - Specifying energy efficiency measures (e.g. insulation, low energy lighting) - Generating renewable energy (e.g. heat pumps, solar photovoltaic panels)	All units will be built to Cam Standard as set out in the Cambridge Sustainable Housing Design Guide.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	No extra energy use is involved						
		Negative Impact:	More energy (gas and/ or electricity) will be consumed (by CCC or others)						
2	WASTE GENERATION	Positive Impact:	Less waste will be generated OR amount of waste that is reused/ recycled will be increased	Low Negative	Yes	Yes	Consider: - Will resources be reduced or reused? - Will you use recycled goods? - Will recycling facilities be increased?	Construction waste is subject to heavily regulated restrictions, however demolition will generate waste which will not be fully recoverable for reuse. Control and oversight of materials use will be under strict oversight.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	No waste will be generated						
		Negative Impact:	More waste will be generated (by CCC or others)						
3	USE OF TRANSPORT	Positive Impact:	The use of transport and/ or of fossil fuel-based transport will be reduced	Medium Positive	Yes	Yes	Consider: - Will you purchase an electric vehicle? - Will you specify the use of public transport? - How will you reduce the need to travel or transport goods?	New housing delivery and subsequent car parking allocations to be in line with the councils ambitions of 0.5 spaces or less per affordable home. Bike storage facilities are provided as standard on new build schemes. EV Vehicle Charging point are outlined to be strategically delivered. While providing additional homes, these schemes are centrally located with very good public transport links to city centre and rail station.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	No extra transport will be necessary						
		Negative Impact:	CCC or others will need to travel more OR transport goods more often further						
4	SUSTAINABLE FOOD	Positive Impact:	Food will be locally grown and/ or meat-free	Nil	No	No	Consider: - Use of locally grown/ produced food - Reducing use of imported food - Reducing use of meat	N/A	N/A
		Nil Impact:	No change in supply of food						
		Negative Impact:	Food will travel long distances and include meat						
2. IMPACT ON RESILIENCE (ADAPTATION) TO THE EFFECTS OF CLIMATE CHANGE									
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE FOLLOWING KEY AREAS :		WHAT IS THE IMPACT CONSIDERED TO BE? <i>See guidance in the purple box, below, to help you assess the degree of the negative and positive impacts e.g. High, Medium or Low</i>		CLIMATE CHANGE RATING: <i>Use drop down list</i>	WILL THE PROJECT HELP CAMBRIDGE CITY COUNCIL TO BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE?	WILL THE PROJECT HELP CAMBRIDGE TO BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE? <i>Use drop down list</i>	PLEASE DETAIL HERE THE ACTION THAT WILL BE TAKEN TO AVOID, MITIGATE OR COMPENSATE FOR THE NEGATIVE IMPACTS AND MAXIMISE POSITIVE IMPACTS?		HAS A NET ZERO CARBON OPTION BEEN CONSIDERED? PLEASE PROVIDE DETAILS.
5	HEATWAVES	Positive Impact:	Increased/ improved shade & natural ventilation	Medium Positive	Yes	Yes	Consider: Building orientation and installing measures such as Brise Soleil to reduce heat gain and plant hydration methods.	All developmental and design work is conducted in line with the updated Sustainable Housing Design Guide, and the proposed development takes into account a review of predicted temperature increases. Orientation, shading, and sunlight exposure are all taken into account.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	No impact on existing levels of shade & ventilation						
		Negative Impact:	Lack of or reduced shade (e.g. from trees or buildings) & natural ventilation						
6	WATER AVAILABILITY	Positive Impact:	Provision made for an enhancement of water efficiency measures to minimise the impact on water resource availability	Medium Positive	Yes	Yes	Consider: Managing water use efficiently, installing measures to use less water such as low water use taps, planting drought resistant plants and using rainwater for irrigation.	All developmental and design work is conducted in line with the updated Sustainable Housing Design Guide. A maximal water use target of <100l/pp/day has been set for the new units.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	Levels of water use will not be changed						
		Negative Impact:	Water use will increase and/ or no provision made for water management = Negative Impact						
7	FLOODING	Positive Impact:	Sustainable drainage measures incorporated, positive steps to reduce & manage flood risk	Medium Positive	Yes	Yes	Consider: The installation of measures to reduce the speed and increase the absorption of rainwater e.g. green roofs, SuDS, permeable paving etc. and alternative arrangements (business continuity)	Planning regulations require design toward planning for 1:100 yr flooding. Water runoff/stormwater management will be designed according to the SHDG and Planning requirements.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	Levels of surface water run-off & flood risk are not affected						
		Negative Impact:	Levels of surface water run-off will increase, no management of flood risk						
8	HIGH WINDS / STORMS	Positive Impact:	Exposure to higher wind speeds is being actively managed & reduced	Nil	No	No	Consider: the need to install stabilisation measures and ensure robust structures resilient to high winds	N/A	N/A
		Nil Impact:	No change to existing level of exposure to higher wind speeds						
		Negative Impact:	Exposure to higher wind speeds is increased or is not managed = Negative Impact						
9	FOOD SECURITY	Positive Impact:	Opportunities & resources for local food production are increased/ enhanced	Nil	No	No	Source food locally, and provide meat-free catering to reduce vulnerability to food shortages and reduce emissions from transport and farming of food	N/A	N/A
		Nil Impact:	No change to opportunities & resources for local food production						
		Negative Impact:	Opportunities & resources for local food production are reduced						
10	BIODIVERSITY	Positive Impact:	Biodiversity will be protected/ enhanced	Medium Positive	Yes	Yes	Provide net gain mitigation if required and seek enhancement in projects of all types and scale	A target 20% biodiversity net gain is proposed to all schemes.	The standards and specification have been reviewed against CCC sustainability guidelines.
		Nil Impact:	Level of biodiversity will not change						
		Negative Impact:	Biodiversity will decrease						
Weighing up the negative and positive impacts of your project, what is the overall rating you are assigning to your project?:				Medium Positive	This overall rating is what you need to include in your report/ budget proposal, together with your explanation to be included in the red box below				

Guidance on Assessing the Degree of Negative and Positive Impacts:

Note: Not all of the considerations/ criteria listed below will necessarily be relevant to your project

Low Impact (L)	* No publicity * Relevant risks to the Council or community are Low or none * No impact on service or corporate performance * No capital assets, or capital assets with lifetime of less than 3 years
Medium Impact (M)	* Local publicity (good or bad) * Relevant risks to the Council or community are Medium * Affects delivery of corporate commitments * Affects service performance (e.g.: energy use; amount of waste; distance travelled) by more than 10% * Capital assets with a lifetime of more than 3 years
High Impact (H)	* National publicity (good or bad) * Relevant risks to the Council or community are Significant or High * Affects delivery of regulatory commitments * Affects corporate performance by more than 10% * Capital assets with a lifetime of more than 6 years

In the box below please summarise the projects impacts (the reasons for the ratings given in column E above) to explain how the overall rating for the project/ proposal has been derived (Cell E37). Please also highlight any negative impacts your project may have and how you plan to avoid, mitigate or compensate for these (as you will have detailed in column I above).

The delivery of these housing development schemes link directly to the cities objective of being Net Zero Carbon by 2030, by providing new homes to very high efficiency standards using Cam Standard with a fabric-led approach.

The councils housing development programme as approved notes a step up in delivery toward net zero, and this development scheme continues the learning across the councils development programme toward that goal. The development will be fully designed to accommodate retrofit to Net zero at a future time as financial viability allows.

All housing development is conducted in line with the Councils updated 2024 Sustainable Housing Design Guide and sets clear requirements in terms of water use, biodiversity and other targets required to be met by new developments to meet the overall environmental objectives of the council.

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Changes to Toilets, Steet Cleaning and Enforcement Activity

To: Cabinet 7th July 2026

Report by:

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Wards affected:

Toilets – Market

Street Cleaning – City

Enforcement Activity - City

Director Approval: Directors James Elms and Sam Scharf confirm that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Cabinet/Cabinet Member for decision.

1.	Recommendations
1.1	The Cabinet is recommended I. To approve the immediate reopening of as many individual toilets at Parkers Piece as feasible following condition and compliance checks. II. To request officers, bring a paper to 23rd September Cabinet setting out options for the future of Parker's Piece and Quayside toilets, including reopening and operating cost, payment options, and capital investment needed to meet any new accessibility requirements. III. That four temporary staff are recruited as soon as possible to provide additional street cleansing capacity at priority hotspots, including the city centre, and strengthening programmed cleansing activity across the city, to be organised into a new daily 12-7pm shift.

	IV. To agree that officers implement route optimisation and operational redesign informed by performance and REEN smart bin technology data to deliver efficiencies that can release existing cleaning capacity for priority hotspots. V. To agree that officers will bring a more detailed paper on longer-term staffing requirements once the additional temporary resource is in place and its impact can be assessed to feed into the budget setting process in late Autumn. VI. To agree to the recruitment of two additional temporary Public Realm Enforcement Officers (a permanent appointment would be made in September, which would replace one of the temporary posts) so that a team of 5 enforcement officers will be funded from July to the end of the financial year. VII. To agree that officers bring an evidence-based report to Cabinet in November/December setting out the impact of the additional capacity and other reforms to improve prevention and enforcement activity with advice on whether there is sufficient capacity or whether further resources are required. VIII. That the in-year revenue costs of these proposals are funded using the Transformation and Reinvestment Fund, anticipated to be up to £200k, and that the CFO has delegated authority to approve this. IX. That proposals are brought forward as part of the 2027/2028 Budget setting process so that future funding for the costs of toilet reopening, additional street cleaning and enforcement activity can be secured.
2.	Purpose and reason for the report
2.1	As a result of the political agreement between the Liberal Democrat and Labour Groups the following actions were agreed: • at a meeting on 7 July, the Cabinet will consider a report in support of the objectives of a budget amendment to implement Liberal Democrat proposals on reopening Parker's Piece and Quayside toilets, and the resourcing of council delivery of street cleaning, and public realm enforcement, which would be implemented at the earliest possible opportunity in the current financial year. • In the interim, steps will be taken to hire additional staff on a temporary basis to increase street cleansing and public realm enforcement in the city centre during the busy summer months.

	This report provides recommendations on changes to Public Toilets, Street Cleansing, Public Safety and City Centre Enforcement as set out in the Liberal Democrat 2026 budget amendment.
3.	Background and key issues
3.1	The Liberal Democrat budget amendment was published in February 2026 with the expectation that the measures could be taken forward from the beginning of financial year 2026-2027. Officers provided advice to ensure that the proposals were legal and could be delivered. That advice did not include plans for how and when the proposals could be implemented. Officers have reviewed the operational, financial and practical implications of implementing the measures. This identified opportunities to deliver the agreed objectives in a sustainable and cost-effective way, building on wider service transformation and operational improvements. This report sets out the recommended approach to implementing the amendment. This includes a phased approach to public toilet reopening, targeted investment in additional street cleansing capacity and enhanced environmental enforcement arrangements. Together, these measures are intended to deliver visible improvements while ensuring implementation is affordable, deliverable and informed by evidence. Practical short-term action will be taken where possible, while further evidence-based reports to Cabinet will set out the longer-term operating model, staffing requirements, costs and compliance implications to maximise value for money and impact against objectives. This will help to ensure that once permanent changes are introduced, they are not subsequently reversed as cost pressures rise with the transition into a unitary authority. In year funding from the Transformation and Reinvestment Fund will be required to implement the recommendations. Subsequent advice will include budget bids as part of the 2027/2028 budget setting process. If the recommendations above are approved by Cabinet and implemented effectively the objectives of the political agreement would be met.

4.	Public Toilets The 2026/27 Liberal Democrat budget amendment proposed: <i>“Reopening of Parker’s Piece toilets. Having been closed based on usage data which was heavily impacted by availability of access only by coins, prior to COVID-19 these public toilets were heavily used and clearly provided an important service. They will be reopened immediately, incurring the full cost of cleaning and maintenance which will be initially budgeted for two years. During this time, reader access for bank cards will be installed with the intention of defraying these costs partly or completely. A report to members will then be brought forward after a short bedding-in period to allow a decision on the future of the toilets from 2028-29 onwards.”</i> <i>“Bank card readers at public toilets. Cashless access is recognised as essential to the long-term viability of pay-to-enter public toilets in high footfall locations. This bid will provide for installation of bank card readers at Parker’s Piece and Quayside public toilets to enable access and support continued operation beyond 2027/28 on a financially sustainable basis.”</i> Option 1 – Immediate reopening of Parker’s Piece and permanent reopening of Quayside in line with the proposed budget amendment. This option would seek to implement the budget amendment by reopening Parker’s Piece immediately and introducing contactless payment infrastructure at both Parker’s Piece and Quayside at the earliest opportunity. Benefits: • Delivers the visible intent of the political commitment quickly • Increases public toilet availability • May improve accessibility and customer satisfaction • Enables earlier testing of contactless charging assumptions Risks and limitations:

- The funding assumptions in the original amendment were prepared at a high level and did not fully account for the wider cost of implementation, reinstatement and ongoing operation.
- Reopening requires more than opening facilities and collecting income; works required may include electrical upgrades, communications connectivity, access control changes, refurbishment and compliance works, payment infrastructure, signage and integration with cleaning and maintenance operations.
- Elements of closed facilities have been used operationally for spares and repairs across the wider network, which may increase reinstatement requirements.
- Quayside presents additional complexity because of its seasonal operation, site constraints and the practical challenge of adapting a facility while open.
- There remains uncertainty regarding whether charging income would fully offset additional operating expenditure.

This option is **not recommended** at this stage because reinstatement costs are not yet known, and there are implementation and affordability risks which may result in future pressure to close or subsidise facilities if operating assumptions are not realised.

Option 2 – Maintain existing arrangements and continue current provision only

This option would retain current arrangements, including seasonal operation at Quayside and closure of Parker's Piece, while continuing investment in retained facilities.

Benefits:

- Avoids additional capital and revenue expenditure.
- Maintains focus on existing investment priorities and service sustainability.
- Avoids operational disruption and implementation risk.

Risks and limitations:

- Does not deliver the agreed political commitment.
- Misses' opportunity to test alternative charging and operating approaches.

- Does not establish evidence on whether contactless access can improve viability.

This option is **not recommended** because it would not support the agreed objectives.

Option 3 – Phased implementation and evidence-led reopening (Recommended)

This option delivers the objectives of the political commitment through a phased programme of feasibility, adaptation and monitored reopening.

Phase 1

- Immediate reopening of as many individual Parkers Piece toilets as practical and feasible
- Detailed condition review and cost assessment
- Evaluation of contactless charging and access arrangements
- Review future operating requirements

Phase 2

- Targeted capital investment and implementation
- Review of demand, usage, income, operating costs and customer feedback

Benefits

- Delivers on the political commitment
- Reduces implementation and affordability risk
- Allows future decisions to be informed by operational evidence and charging options
- Maintains flexibility to respond to future requirements relating to accessibility, customer expectations and facility design
- Gathers evidence based needs for advice to set out future direction, need and demand

Officers would bring a paper to 23 September Cabinet setting out options for the future of Parkers Piece and Quayside toilets, including reopening and operating cost, payment options, and investment needed to meet new accessibility requirement

	This option is recommended because it enables immediate reopening and establishes a process to assess and fund viable long-term service provision.
5	Street Cleaning The 2026/27 Liberal Democrat budget amendment proposed: <i>“Improvement of street cleaning services... a new two-person shift working 12:00–19:00 within the existing 7 day week shift rota will be added, involving appointment of 4 additional staff. Staff will be deployed across the city from 12:00–16:00 to support programmed bin cleaning, jet spraying, removal of fly tips and graffiti, and from 16:00–19:00 to provide an additional bin and cleaning round...”</i> This advice considers how the objectives of the budget amendment can be delivered in a way which improves visible service outcomes whilst maintaining affordability, supporting ongoing transformation activity and avoiding unnecessary long-term growth in the Council's operating cost base. The advice reflects wider service transformation already underway, including deployment of REEN smart bin technology, route optimisation and operational redesign intended to improve productivity and target resources where they deliver greatest benefit for residents. Option 1 – Implement the original budget amendment in full through immediate permanent recruitment and expansion of operational resource. This option would introduce additional permanent staffing resource in 2-4 months to deliver extended cleansing coverage and increased programmed activity. Benefits • permanent increase in operational capacity • visible increase in city centre presence • additional resilience for environmental maintenance activity

Risks and limitations

- 2-4 month recruitment and onboarding timescales may delay implementation
- creates recurring revenue growth before operational demand and deployment assumptions are fully understood
- could embed operating arrangements ahead of wider service optimisation reducing incentive to realise efficiencies through transformation activity

This option is **not recommended**.

Option 2 – Maintain current arrangements and continue optimisation activity only

This option would retain existing service arrangements and rely solely on route optimisation, operational redesign and REEN deployment to deliver improvements.

Benefits

- avoids additional expenditure
- allows operational redesign to mature

Risks and limitations:

- unlikely to deliver visible improvements as quickly
- does not fully deliver the budget amendment objectives

This option is **not recommended**.

Option 3 – Phased implementation combining immediate targeted investment and operational redesign (Recommended)

This option combines temporary and targeted additional operational capacity with route optimisation and operational redesign.

Phase 1

- immediate deployment of temporary staff to focus on city centre and high-footfall locations

	Phase 2 • refinement of rounds using REEN data • redeployment of permanent staff as they can be released through round optimisation Phase 3 • review of operational outcomes and longer-term resource requirements Benefits • delivers visible improvements quickly • supports financial sustainability • maintains flexibility • enables longer-term productivity gains This option is recommended because it delivers the objectives of the political commitment whilst maintaining operational resilience and supporting wider transformation activity. Subject to evidence of effectiveness, officers preferred long-term model is likely to be two additional permanent members of staff, supported by service efficiencies equivalent to 2 FTEs. Officers will bring a more detailed paper on longer-term staffing requirements once the additional temporary resource is in place and its impact can be assessed. This will need to be ready to feed into the budget setting process in late Autumn. 2026/27 staff and other operational costs estimated ~£125k
6	Enforcement Activity The 2026/27 Liberal Democrat budget proposed: <i>“Since the recent restructuring the reduced number of Public Realm Enforcement Officers have become primarily reactive resource with field visits mainly being driven by service requests from colleagues and the public. The appointment of two additional officers will reinforce their collective capacity for a programmed preventative mode of operation across the city, including a strengthened presence at the pressure points of</i>

the city centre and seasonal weekends. This will enable the council's agreed policies across a wide range of environmental anti-social behaviour to be more systematically monitored and deterred."

The new public safety team has blended the former public realm enforcement team and former ASB team. There has been some repurposing of roles and management efficiencies. The integrated team has reduced duplication and built capacity to continue to fulfil the demands of the service required for both ASB and public realm enforcement. That includes reactive as well as proactive visibility of services. Previously there were some overlaps in enforcement activity and visibility when out patrolling.

Current operational activity includes weekend patrols, City Centre enforcement activity and coordinated working across services. Operational pressures include street-life related ASB, illegal trading, charity collections, waste management issues, pavement licenses and A-board compliance. Process mapping work has identified opportunities to improve coordination across services and highlighted increasing reactive demand. This work continues to identify areas for further efficiencies.

Alongside the public safety team, the Council benefits from wider resources for housing and public realm who also carry out proactive and reactive enforcement that are funded via the Housing Revenue Account. This includes caretaking of our large housing blocks and estates, education and enforcement regarding fire management (which includes fly-tipping and safe storage) and environmental improvements to support preventative management.

This team consists of 5 officers.

Option 1: Maintain Existing Arrangements: Continue operating within the current staffing establishment, primarily deploying resources based on service requests from colleagues and the public.

Benefits

- No additional cost
- Maintains current operating arrangements

- Allows further development of existing partnership working

Risk and Limitations

- Existing reactive pressures remain
- Limited capacity for preventative or planned activity
- Reduced flexibility during peak demand periods

This option is **not recommended**.

Option 2: Implement proposed amendment: To recruit two permanent roles within the Public Safety Team at a cost of £105,000 to the team budget per year.

Benefits

- Increased operational capacity
- Greater ability to undertake planned and preventative enforcement activity
- Additional visibility in city centre and hotspot locations
- Capacity to support wider enforcement and educational activity

Risk and Limitations

- Additional ongoing revenue cost around £105k
- 2-4 month recruitment and onboarding timescales
- Lack of certainty regarding the redevelopment of the City Centre estate (Civic Quarter) and impact on enforcement activity

This option is **not recommended**.

Option 3: Phased or trial approach: Introduce 2 temporary enforcement officers immediately to focus on identified hotspot areas including the city centre while operational demand and service data continues to be reviewed. A permanent appointment is expected to be made in September, which would replace one of the temporary posts, as part of the trial period up until March 2027.

Risks

- Allows operational testing and review

	• Retains flexibility around future staffing and operational model • Lower cost at £65k Risks and Limitations • Shorter-term operating model • Reduced continuity compared to permanent staffing arrangements • Potential difficulty in recruiting temporary staff This option is recommended as it will provide an opportunity for immediate resource to be deployed into the City Centre whilst the service finalises processes across the team which could release internal capacity. This will also allow agility depending on Civic Quarter decisions later in 2026 which may impact critical spaces in the city centre. The Public Realm Enforcement team currently has four posts, including one vacancy. A temporary member of staff will be appointed to cover that vacancy, and a further temporary post will be added, taking the team to five officers. The additional capacity will run until March 2027. A permanent appointment is expected to be made in September, which would replace one of the temporary posts. Cost: estimated £65k
6.	Corporate plan and Council Vision
6.1	The proposals support delivery of the Council's Corporate Plan and Council Vision by maintaining high-quality, accessible public services and a clean, welcoming public realm. They contribute to a sustainable and inclusive city by improving the resident and visitor experience based on an evidence-based approach to ensure services remain financially sustainable. The recommendations also support the Council's ambition to be a well-run organisation by using evidence, operational learning and technology to improve service delivery, and deliver better value for money while maintaining flexibility to respond to future demand.
7.	Consultation, engagement and communication

7.1	The proposals have been developed through operational review, previous budget decisions, performance information and engagement with relevant Council services and members. They reflect operational experience, customer feedback, financial considerations and the need to balance service quality, accessibility and long-term sustainability. Implementation will be supported by continued engagement with members, staff, Trade Unions and key stakeholders, alongside clear communication with residents and service users as changes are introduced and impacts monitored.
8.	Anticipated outcomes, benefits or impact
8.1	Public Toilets The proposals are intended to deliver a sustainable, accessible and financially viable public toilet service that supports the Council's agreed policy objectives. Success will be measured through operational performance, customer feedback and ongoing review to inform future investment decisions. Street Cleaning The proposals are intended to improve environmental quality through more effective deployment of resources while supporting long-term service transformation and financial sustainability. Success will be monitored through operational performance, visible standards and resident feedback. Enforcement The proposals are intended to strengthen the Council's ability to respond proportionately to environmental offences and anti-social behaviour through a more effective and targeted enforcement approach. Success will be monitored through enforcement activity, compliance levels and resident feedback.
8.	Implications

8.1	Relevant risks
	Delivery of the recommendations is dependent on achieving visible improvement whilst maintaining affordability and supporting wider service transformation. Key risks include: • implementation creating recurring cost pressures before service needs and longer-term efficiencies are realised; • visible improvements not being delivered quickly enough to meet expectations; • operational changes creating unintended pressure elsewhere in the city; • delays to implementation due to workforce or mobilisation requirements. These risks will be mitigated through the recommended phased implementation approach, targeted deployment, operational monitoring and review points prior to any permanent changes in service capacity.
	Local Government Reorganisation (LGR)
8.2	The recommendations have been developed to maintain operational flexibility ahead of Local Government Reorganisation to avoid creating unnecessary long-term dependency on permanent structural growth before future service integration discussions.
	Financial Implications
8.3	The recommended options will be funded from the Council's Transformation and Reinvestment Fund at a cost of up to £200k. Additional funding for public toilet reinstatement and operation to be confirmed following completion of the necessary surveys and cost assessments.
	Legal Implications

8.4	Implementation may require temporary changes to deployment arrangements and limited additional operational capacity during mobilisation. The recommended approach prioritises redesign and optimisation before consideration of permanent staffing growth in line with the Council's Best Value statutory duties. Any workforce implications will be managed through normal Council processes and engagement arrangements.
	Equalities and socio-economic Implications
8.5	Public Toilets The UK Supreme Court has clarified the interpretation of "sex" for the purposes of the Equality Act 2010. The Equality and Human Rights Commission (EHRC) has subsequently published a draft Code of Practice and guidance to reflect that judgment. At the time of writing, the draft Code of Practice has not been approved by Parliament and is therefore not yet in force. Cambridge City Council is a signatory to the Cambridgeshire-wide Equality Pledge which states: "We believe in the dignity of all people and their right to respect and equality of opportunity. We value the strength that comes with difference and the positive contribution that diversity brings to our community. Our aspiration is for Cambridge and the wider region to be safe, welcoming and inclusive." The council recognises that the updated Code has prompted discussion and concerns from communities about how public services balance the rights, needs and dignity of different groups protected under the Equality Act 2010. The council remains committed to providing services that are lawful, accessible, safe and respectful for everyone who uses them. Future investment decisions should take account of accessibility requirements, resident expectations and any relevant changes in the legal or policy framework relating to public toilet provision.

	Street Cleaning Cleaner, safer and more accessible public spaces benefit all residents, visitors and businesses, with particular benefits for older people, disabled people and those who rely most on public spaces. Equality impacts will continue to be considered as part of implementation, and an Equality Impact Assessment will be undertaken where required. Public Realm Enforcement Increased visible presence in public spaces, particularly in high-pressure areas, may improve perceptions of safety across all communities. A proactive approach reduces dependence on individuals reporting issues, benefiting those who may face barriers to engagement (e.g. digital exclusion, language barriers). Better management of environmental issues (e.g. littering, obstruction) supports accessibility for disabled people and those with mobility needs. Proactive engagement in the city centre will support vulnerable people such as street life to be signposted to relevant services There is a risk that increased enforcement activity could disproportionately affect certain groups (e.g. young people, minority communities, or vulnerable individuals) if not carefully managed. Increased presence in city-centre “pressure points” may lead to concerns about over-surveillance or bias.
	Net Zero Carbon, Climate Change and Environmental implications
8.6	The proposals support a more targeted approach to service delivery through route optimisation and smarter deployment of operational activity. Improved efficiency and reduced unnecessary servicing activity may support reduced operational mileage and more effective use of resources.
	Procurement Implications

8.7	Implementation is expected to be delivered primarily through existing operational arrangements. Where additional equipment, temporary resource or supporting services are required, procurement activity will be undertaken in accordance with Council procedures.
	Community Safety Implications
8.8	Maintaining cleaner and well-presented public spaces supports confidence in the public realm and contributes positively to perceptions of safety and environmental quality
	Consultation and Communication Implications
8.9	Implementation will require communication with staff, Members and residents regarding expectations, delivery arrangements and monitoring of outcomes
	If you have a query on the report please contact Alistair Wilson, Assistant Director for Environment and Public Realm, 01223 458514, alistair.wilson@cambridge.gov.uk

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**REPORT TITLE: Community Infrastructure Levy Draft Charging Schedule
Consultation Outcome and Submission for Examination**

**To: Leader & Cabinet Member for Planning and Transport, Councillor Thornburrow
Cabinet, 7 July 2026**

Report by: James Fisher, Team Leader
Tel: 01954 713217
Email: james.fisher@greatercambridgeplanning.org
Wards affected:
All Wards

Director Approval: Director Stephen Kelly confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Cabinet/Cabinet Member for decision.

1.	Recommendations
1.1	It is recommended that Cabinet authorises: The submission of the draft charging schedule, an amended draft instalment policy, and associated evidence for independent examination.
2.	Purpose and reason for the report
2.1	On 10 February Cabinet authorised a public consultation on the draft CIL charging schedule and associated documentation. The Council undertook a 6-week consultation between Monday 16 February 2026 and Sunday 29 March 2026. A consultation was undertaken at the same time for the South Cambridgeshire District Council draft CIL charging schedule and representations were invited in relation to both. The purpose of the Cambridge City and South Cambridgeshire CIL is to secure more money from developments to help address the funding deficit for strategic transport infrastructure. Section 106 planning obligations will still be used to fund localised infrastructure including (but not limited to) schools, surgeries, community centres, and sports facilities.

	The consultation sought views from developers and our communities on the following CIL rates: •£35psm for industrial buildings and data centres •£50psm for shops, restaurants, financial and professional services, and hotels •£60psm for houses and flats, retirement homes, residential institutions, and student accommodation •£175psm for offices and R&D buildings The Councils received 630 comments from 139 respondents. Officers have produced a Consultation Statement to summarise the broad theme of all representations and the Councils response to these. This statement is appended to the Cabinet report along with appendices containing representations received through the consultation platform and representations received by letter which have been summarised. Broadly speaking there was support for the adoption of CIL because there was recognition that all developments should contribute towards infrastructure and the sense that developers were “wriggling out” of negotiated s106 contributions. This support was predicated on the Councils being confident that the introduction of CIL would not create an adverse impact on growth or other planning policy objectives. Some who objected were opposed to any new taxation. Details relating to the infrastructure funding gap the Councils were relying on attracted many comments. Objectors stated that the infrastructure evidence is out of date, that there is no gap, that the gap is smaller than that being reported, that the gap is larger than being reported, and that the mismanagement of funds is the reason for any gap. A significant number of representations focussed on the rates and the evidence that had been prepared for the Councils by independent viability experts. Many respondents submitted information relating to (for example) sales value, costs, profit, and fees. Other respondents sought to have specific sites (including strategic sites) exempted from CIL. Some respondents considered the Councils should be charging developers more to develop in the area. No one objecting to the proposed rates offered alternative rates. Broadly speaking most respondents understood how the Councils will use CIL alongside s106 contributions although some required a little more clarity. Whilst there was broad support for the draft instalment policy there were some suggestions relating to having further instalments for larger payments and where payment is made over a longer period. In terms of other comments some respondents considered that the regulatory requirements had not been met because of the lack of reference to how CIL Reg 43 Mandatory Charitable exemption and CIL Reg 44 discretionary charitable exemptions applied. Having considered representations and examined carefully the submissions made on viability, Officers and the Councils viability consultants remain satisfied that the Council

	has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments and that regulatory requirements have been met. This report recommends that the Council submits the draft charging schedule and associated evidence for independent examination. Adopting a CIL ensures that the Councils follow through on their City Deal commitments to generate an adequate local contribution to fund the infrastructure necessary for the Local Plans. It also ensures that all eligible development contribute towards the infrastructure that they benefit from and that planning permissions can be issued quicker. The consultation has demonstrated broad support for the proposed rates. Viability evidence has been re-evaluated following representations received from developers. This has confirmed support for the rates whilst recognising that the position for offices and research and development space is more challenging than when the viability assessments were carried out and the evidence available at that time.
3.	Alternative options considered
3.1	The options are: - To authorise the submission of the draft CIL charging schedule for independent examination which would lead to the introduction of a CIL to help address the identified funding deficit. - To authorise the submission of the draft CIL charging schedule with alternate rates alongside the publication of a 'Statement of Modifications' preceding any examination - To instruct Officers to continue to negotiate developer contributions through S106 agreements recognising the challenges associated with this approach as outlined in the 3 February Cabinet report.
4.	Background and key issues
4.1	Cambridge City Council and South Cambridgeshire District Council (the Councils) undertook a 6-week consultation on their respective Community Infrastructure Levy draft charging schedules between Monday 16 February 2026 and Sunday 29 March 2026. The Councils notified all consultation bodies and around 2,000 persons who had (a) responded to previous CIL consultations, or (b) who had responded to the Greater Cambridge Planning Obligations Supplementary Planning Document consultation, or (c) who had opted in to be notified about planning policy matters in Greater Cambridge generally. On Wednesday 18 February a notice was published in the Cambridge Independent and the Councils publicised details of the consultation as follows: • 16 February: Greater Cambridge Shared Planning LinkedIn profile post • 18 February: Greater Cambridge Shared Planning X profile post • 9 March: A reminder of the consultation was published on the LinkedIn profile of Greater Cambridge Shared Planning

The following presentations were given to stakeholders:

- 27 February: Officers gave an online presentation to Cambridge Ahead
- 6 March: Officers gave an in-person presentation to the Cambridge Development Forum
- 11 March: The Councils viability consultants (Quintic Advisory LLP previously BNP Paribas Real Estate) gave an online presentation to developers and agents

The Councils published a series of questions to help focus representations:

- Do you agree that the Council should introduce CIL?
- Do you agree that the Council has demonstrated a funding gap?
- Do you agree that the Council has used appropriate evidence to inform the proposed rates?
- 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?
- Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?
- Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?
- Do you agree that the Council has met all regulatory requirements?
- The Council is allowed to use 15% of CIL receipts to improve the area close to where development took place. This is known as the 'neighbourhood portion'. Details of how this will work in Cambridge will be worked up over the next 12 months. If you have any comments on how you feel the neighbourhood portion should be distributed, please let us know.

The Councils received 630 comments from 139 respondents. Officers have produced a Consultation Statement to summarise the broad theme of all representations and the Councils response to these.

Full representations received through the Councils consultation platform are appended to the Consultation Statement. This includes representations received by letter where the respondent provided a clear answer to the each of the consultation questions.

Representations that were received by letter have been summarised by Officers and appended to the Consultation Statement. The full letters, along with the supporting information, will be published in full on the Councils website.

67 (49%) of respondents were from residents. 48 (35%) were from developer/agent/landowners. 10 (7%) were from Parish Councils. The balance (14) was from public bodies, community groups, charities etc.

Up to 43 parties indicated that they may wish to participate in the CIL examination. Experience shows that many parties who express an interest to participate often decide not to. The Uttlesford District Council CIL public examination held on 20 May 2026 closed after 9 minutes as parties (who had stated a desire to attend the examination) did not appear.

	Comment	Object	Support
Do you agree that the Council should introduce CIL?	54	23	59
Do you agree that the Council has demonstrated a funding gap?	30	22	32
Do you agree that the Council has used appropriate evidence to inform the proposed rates?	32	47	18
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?	32	39	21
Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	35	25	22
Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	20	11	18
Do you agree that the Council has met all regulatory requirements?	20	17	18

Broadly speaking there was support for the adoption of CIL because there was recognition that all developments should contribute towards infrastructure and the sense that developers were “wriggling out” of negotiated s106 contributions. Support was predicated on the Councils being confident that the introduction of CIL would not create an adverse impact on growth or other planning policy objectives. Some who objected were opposed to any new taxation.

Details relating to the infrastructure funding gap attracted many comments. Objectors stated that the infrastructure evidence is out of date, that there is no gap, that the gap is smaller than that being reported, that the gap is larger than being reported, and that mismanagement of funds is the reason for any gap.

A significant number of representations focussed on the rates and the evidence that had been prepared for the Councils by independent viability experts. Many respondents submitted information relating to (for example) sales value, costs, profit levels, and fees. Other respondents sought to have specific sites (including strategic sites) exempted from CIL. Some respondents considered the Councils should be charging developers more to develop in the area.

No one objecting to the proposed rates offered alternative rates.

Broadly speaking most respondents understood how the Councils will use CIL alongside s106 contributions whereas some required a little more clarity.

Whilst there was broad support for the draft instalment policy there were some suggestions relating to having a fifth instalment for larger payments and where payment is made over a longer period.

In terms of other comments some respondents considered that the regulatory requirements had not been met because of the lack of reference to how CIL Reg 43 Mandatory Charitable exemption and CIL Reg 44 discretionary charitable exemptions applied.

The Consultation Statement appended to the report provides evidence of the Councils review of submissions and response to each of the representations received. Further work has been undertaken in response to specific concerns expressed about the proposed CIL rate for offices and research and development space. Comments received highlighted that the economics of such development is now more challenging than when the Councils earlier viability assessments were carried out. The Councils viability consultant was therefore asked to consider again the initial assumptions underpinning the draft CIL charging schedule rate based upon the submissions raised. The further assessment has nevertheless concluded that the rates proposed remain appropriate and Officers are accordingly recommending that no changes are made to the draft charging schedule.

Officers recommend a modification being made to the instalment policy. The instalment policy that was consulted on proposed payment terms based on four thresholds. CIL liabilities of £500,000 or more (the highest threshold) would be paid in four equal instalments of 25% at the following days following implementation: 120, 240, 360, 420. Officers recommend increasing the last payment date to 480 days so that there is 120 days between each instalment. A fifth threshold would be introduced for CIL liabilities over £1m where five equal instalments of 20% of the CIL liability is due at the following days from commencement: 120, 240, 360, 480, 600. The tracked change version of the draft instalment policy is appended to the report.

If the Council proposed making substantive modifications to the draft Charging Schedule it would need to be reconsulted on. Minor modifications could be made without consultation. These would need to be set out in a 'statement of modifications'. The Council would need to notify everyone who provided a comment on the original consultation and give them 4 weeks to state whether (considering the modifications) they now wished to be heard by the examiner, whether they support or oppose the modifications, and why.

A Charging Schedule must be examined in public by an independent person appointed by the charging authority. The Council has issued an invitation to tender for this work and will appoint an examiner if the authority to proceed to examination is given.

Any person asking to be heard before the examiner at the examination must be heard in public. An informal hearing format is usually the most appropriate form of examination for the Community Infrastructure Levy and these typically last a single day.

If no-one has requested the right to be heard, the examiner also has the option of conducting the examination by written representations.

The examiner must report their recommendations to the charging authority in writing. The examiner may recommend that the draft charging schedule should be approved, rejected, or approved with specified modifications. The examiner must give reasons for those recommendations. Further details are set out as follows:

- a. Approval: the examiner must recommend approval of the draft charging schedule if a charging authority has complied with the requirements in the Planning Act and the levy regulations. In doing so, the examiner should establish that:
 - the charging authority has complied with the legislative requirements set out in the Planning Act 2008 and the Community Infrastructure Levy Regulations (as amended);
 - the draft charging schedule is supported by background documents containing appropriate available evidence;
 - the charging authority has undertaken an appropriate level of consultation;
 - the proposed rate or rates are informed by, and consistent with, the evidence on viability across the charging authority's area; and
 - evidence has been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see National Planning Policy Framework paragraph 34).
- b. Approval subject to modifications: if the charging schedule can be modified so as to comply with the drafting requirements, the examiner must recommend appropriate modifications. This could be the case where the proposed rate or rates would be inconsistent with the evidence or would put the delivery of the relevant plan at risk. As long as the charging authority addresses the non-compliance, they do not have to make the specific modifications recommended by the examiner. The examiner can also make non-binding recommendations.
- c. Rejection: where the charging authority has not complied with the drafting requirements, and this cannot be remedied by modifying the draft charging schedule, the examiner must recommend that the schedule is rejected. For example, this may occur where the charging authority has not complied with a procedural requirement in preparing the schedule.

What this means in practice is that the Inspector may recommend the adoption of CIL but with slightly amended (i.e. reduced) rates for some uses.

Whilst many charging schedules are adopted with no modifications, many CIL examiners decide that modifications are required.

In Teignbridge the Council proposed five zones with a (lowest) CIL rate of £70psm in Zone 3 including Bradmore New Neighbourhood. The CIL examiner said the proposed rate of £70 could undermine the deliverability of this critical site and that there is a significant risk to the delivery of housing. The examiner reduced the CIL to £0psm in this zone.

	In the London Borough of Ealing the CIL examiner reduced the proposed rate of data centres from £200psm to £150psm. In Reigate and Banstead the CIL examiner changed the rate for residential developments built in zone 1 from £20 to £0 psm. Some examiners go beyond adjusting CIL rates. In West Oxfordshire the Council proposed a residential rate of £225psm on all greenfield developments. The CIL examiner added a threshold where such developments over 250 dwellings paid £150psm instead. Assuming a successful examination the charging schedule must be formally approved by a resolution of the Full Council of the charging authority. The resolution should include an appropriate commencement date following, or on, approval. CIL is expected to be implemented in early 2027.
5.	Corporate plan
5.1	<i>Explain how the decision links to the Councils Corporate Plan</i> Corporate plan 2022-27: our priorities for Cambridge - Cambridge City Council Priority 1: Leading Cambridge's response to the climate change and biodiversity emergencies. The work we do with others through the Greater Cambridge Partnership aims to create wider prosperity and improve quality of life now and into the future through better, greener transport. Priority 2: Tackling poverty and inequality and helping people in the greatest need The Council will work with voluntary and community groups and local employers to help strengthen local communities, and we will work cooperatively with partners to address the underlying issues. And we will seek to listen to and work with our communities, making sure that we work in partnership with residents rather than simply doing things for them. Priority 4: Modernising the council to lead a greener city that is fair for all Develop co-operative, collaborative ways of working with our communities and partners, increasing our collective ability to achieve the council's vision and improve the quality of life and wellbeing of everyone in the city
6.	Consultation, engagement and communication
6.1	Cambridge City Council consulted on a preliminary draft charging schedule in 2013 and a draft charging schedule in 2014.

	The consultation on this draft charging schedule took place for 6 weeks between Monday 16 February and Sunday 29 March 2026. In addition to publications issued by the Councils, news and details of the consultation were circulated by third parties including: • Cambridgeshire News (11 February) • Cambridgeshire Chamber of Commerce (25 February) • The Cambridge Town Owl (3 February) • Cambridge Cycling Campaign (26 March)
7.	Anticipated outcomes, benefits or impact
7.1	Adopting a CIL ensures that the Councils follow through on their City Deal commitments to generate an adequate local contribution to fund the infrastructure necessary for the Local Plans. It also ensures that all eligible development contribute towards the infrastructure that they benefit from and that planning permissions can be issued quicker.
8.	Implications
8.1	Relevant risks
	The report seeks authority to submit the draft CIL charging schedule and associated document to an independent examiner. Provided the Council has met all regulatory requirements the examiner can approve the draft CIL charging schedule as submitted or approve it subject to modifications. The Regulations require a charging schedule to be formally approved by a resolution of the Full Council of the charging authority. If the Council does not like to adopt a CIL that the inspector has sought to modify it could obtain further evidence to support the proposed rates and undertake further consultation.
	Financial Implications
8.2	Costs associated with the adoption of CIL include the viability report and the examination. Administrative expenses associated with charging the levy include the costs of acquisition of new software and the appointment of officers to administer the collection and spend of the levy. To help charging authorities with initial set up costs, the regulations allow for a 'rolling cap' on administrative expenses. This covers the period comprising the first part of the year that an authority sets a levy and the following 3 financial years taken as a whole. From year 4 onwards of an authority's levy operation, the restriction works as a fixed in-year cap, meaning that an authority may spend up to 5% of receipts received in-year by the end of that year on its administrative expenses.

	Legal Implications
8.3	The CIL Regulations explain the necessary steps relating to CIL consultation and examination which the Councils have followed and will continue to follow.
	Equalities and socio-economic Implications
8.4	In January 2011 Communities and Local Government published a document titled 'Localism Bill: Community Infrastructure Levy Impact Assessment' which included a section Specific Impact tests on 'Equality'. It said "The Community Infrastructure Levy is unlikely to have an adverse impact on any social group. By making communities more sustainable, the Community Infrastructure Levy will facilitate economic growth and liveability and so create opportunity for all. The infrastructure and services that the Community Infrastructure Levy will provide will enhance accessibility and liveability for all sectors of society and could help to deliver new infrastructure that serves different needs within the community, for example, by increasing mobility and accessibility.
	Net Zero Carbon, Climate Change and Environmental implications
8.5	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.
9.	Background documents Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985
9.1	Cabinet Report 'Community Infrastructure Levy draft Charging Schedule' 10 February 2026 and associated documents.
10.	Appendices
10.1	Appendix A Community Infrastructure Levy Consultation Statement Appendix B Representations received through online platform Appendix C Representations received by letter summarised Appendix D South Cambridgeshire District Council Instalment Policy - tracked changes
	To inspect the background papers or if you have a query on the report please contact James Fisher – Team Leader

	James.fisher@greatercambridgeplanning.org Telephone: (01954) 713217 and 07927 681965

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GREATER CAMBRIDGE SHARED PLANNING

Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy Consultation Statement

1 Introduction

The Community Infrastructure Levy ('CIL') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. CIL only applies in areas where a local authority has consulted on, and approved, a charging schedule which sets out its levy rates and has published the schedule on its website.

Cambridge City Council and South Cambridgeshire District Council have always intended introducing CIL with consultations on a preliminary draft charging schedule and a draft charging schedule taking place in 2012 and 2013 before both Councils submitted draft charging schedules to the Planning Inspectorate for examination in the Autumn of 2014.

Several factors, which would have had a detrimental effect on the likely success of the CIL examination, and future operation of the proposed CIL, resulted in both Councils agreeing to withdraw the draft charging schedules in 2017. This decision to withdraw the CIL draft charging schedule was made with a view to resubmit a draft charging schedule once identified opportunities had been explored and only after the respective Local Plans had been adopted.

In late 2018 the Cambridge Local Plan and the South Cambridgeshire Local Plan were adopted by the respective Councils.

In August 2020 the 'Planning for the Future' White Paper was published by MHCLG which proposed abolishing Section 106 (S106) and CIL and replacing them with a consolidated Infrastructure Levy (IL) causing any LPA with CIL intentions to wait to see how the policy developed.

Following the Governments decision in 2024 not to pursue IL, the Councils have re-evaluated their positions. Noting announcements made by Greater Cambridge Partnership (GCP), that there are insufficient funds to deliver all of the strategic transport projects that were required to deliver the growth in the adopted Local Plans, and noting the ambitions for further accelerating growth in Greater Cambridge, the Councils consider that there is now a strong justification for the timely introduction of a CIL for the Greater Cambridge area.

An assessment undertaken by the Councils shows that £272m is still needed to deliver the strategic transport infrastructure necessary to deliver Transport Strategy that underpins the 2018 Local Plans. Adopting CIL will ensure that all developments will contribute to addressing this funding gap. The Councils expect CIL to generate between £25m and £50m over the plan period.

Section 106 planning obligations will continue to be 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.

The purpose of this document is to explain how the Councils have met the regulatory requirements. It explains the evidence used by the Councils to support the introduction of the CIL, the viability evidence that has helped establish the proposed rates, the consultation and publication of the charging schedules, and the Councils response to comments made during the consultation.

2 Consultation requirements

Before submitting a draft charging schedule for examination in accordance with section 212 of the Planning Act 2008, the charging authority must:

(a) make a copy of the draft charging schedule, the relevant evidence and a statement of the representations procedure available for inspection (i) at its principal office, and (ii) at such other places within its area as it considers appropriate;

(b) publish on its website (i) the draft charging schedule, (ii) the relevant evidence (to the extent that it is practicable to do so), (iii) a statement of the representations procedure, and (iv) a statement of the fact that the draft charging schedule and relevant evidence are available for inspection and of the places at which they can be inspected;

(c) send to each of the consultation bodies (i) a copy of the draft charging schedule, and (ii) a statement of the representations procedure;

(d) give by local advertisement notice which sets out (i) a statement of the representations procedure, and (ii) a statement of the fact that the draft charging schedule and relevant evidence are available for inspection and of the places at which they can be inspected;

(1A) The charging authority must invite representations on the draft charging schedule from such of the following as the authority considers appropriate (a) persons who are resident or carrying on business in its area; (b) voluntary bodies some or all of whose activities benefit the charging authority's area; and (c) bodies which represent the interests of persons carrying on business in the charging authority's area.

The charging authority must submit the following to the examiner:

(a) the draft charging schedule.

(b) a statement setting out (i) if representations were made, the number of representations made and a summary of the main issues raised by the representations, and a summary of how the representations received were taken into account, or (ii) that no such representations were made.

(c) copies of any representations made.

(d) where the charging authority modified the draft charging schedule after it was published in accordance with regulation 16, a statement of modifications, and

(e) copies of the relevant evidence.

3 Draft Charging Schedule Consultation

Cambridge City Council and South Cambridgeshire District Council (the Councils) undertook a 6-week consultation on their respective Community Infrastructure Levy draft charging schedules and evidence between Monday 16 February 2026 and Sunday 29 March 2026.

The consultation documents and background documents published were:

Draft charging schedules

- Cambridge City Council Draft charging schedule
- South Cambridgeshire District Council Draft charging schedule

Draft Instalment Policy

- Cambridge City Council Draft Instalment Policy
- South Cambridgeshire District Council Draft Instalment Policy

Statement of Representations Procedure

- Cambridge City Council Statement of Representations Procedure
- South Cambridgeshire District Council Statement of Representations Procedure

Supporting CIL Documents

- CIL Supporting statement
- Greater Cambridge Viability Report (BNP Paribas Real Estate)
- Greater Cambridge Infrastructure Statement

Background Documents

- Cambridge Local Plan 2018
- South Cambridgeshire Local Plan 2018
- Infrastructure Delivery Study 2015 (Peter Brett Associates LLP)
- Greater Cambridge Draft Planning Obligations Supplementary Planning Document 2026
- Cambridgeshire County Council Transport Strategy for Cambridge and South Cambridgeshire 2014
- Cambridgeshire County Council Local Cycling and Walking Infrastructure Plan 2022
- Cambridgeshire County Council Local Transport Plan 2015
- Cambridgeshire Active Travel Strategy 2023
- Greater Cambridge City Deal 2014
- Greater Cambridge Partnership Future Investment Strategy 3 2023
- Greater Cambridge Partnership Budget 2026-27
- Cambridgeshire and Peterborough Combined Authority Local Transport and Connectivity Plan 2023
- Cambridgeshire and Peterborough Combined Authority Bus Service Improvement Plan for Cambridgeshire and Peterborough 2021
- Cambridge Growth Company A place of national and global significance 2025

The Councils notified all consultation bodies and around 2,000 persons who had (a) responded to previous CIL consultations, or (b) who had responded to the Greater Cambridge Planning Obligations Supplementary Planning Document consultation, or (c) who had opted in to be notified about planning policy matters in Greater Cambridge generally.

On Wednesday 18 February a notice was published in the Cambridge Independent.

The Councils publicised details of the consultation as follows:

- 13 February: South Cambridgeshire Business newsletter article
- 16 February: Greater Cambridge Shared Planning LinkedIn post (3100 followers)
- 16 February: Greater Cambridge Shared Planning Facebook post (312 followers)
- 18 February: Greater Cambridge Shared Planning X post (134 followers)
- 9 March: Greater Cambridge Shared Planning LinkedIn profile post reminder

Presentations were given to stakeholders as follows:

- 27 February: Cambridge Ahead (a 50-member forum who produce data-driven insight, collaborate with policymakers, and champion the contribution Cambridge city region makes nationally and locally).
- 6 March: Cambridge Development Forum (a 31-member forum who act as a strategic voice, championing practical solutions to planning challenges and advancing the efficient delivery of high-quality, sustainable housing and commercial development).

- 11 March: The Councils viability consultants Quintic Advisory (previously BNP Paribas Real Estate) gave a presentation to developers and agents.

Officers took questions at the annual Parish Council Clerk Conference on 4 March.

Cambridge Ahead describes itself as a deeply committed, long-term voice for the Cambridge economy, dedicated to good growth that improves quality of life. On behalf of its (circa) 50 members they produce data-driven insight, collaborate with policymakers, and champion the contribution Cambridge city region makes nationally and locally.

Cambridge Development Forum describes itself as a collaborative platform Chaired by The Rt Hon. Lord Lansley CBE dedicated to supporting sustainable growth and development across four key regions: Cambridgeshire, Thames Valley, Greater Cheshire, and Norfolk & Suffolk. The UKDF acts as a strategic voice, championing practical solutions to planning challenges and advancing the efficient delivery of high-quality, sustainable housing and commercial development. It has over 30 Members.

News and details of the consultation were circulated by third parties including:

- Cambridgeshire News (11 February)
- Cambridgeshire Chamber of Commerce (25 February)
- The Cambridge Town Owl (3 February)
- Cambridge Cycling Campaign (26 March)

The Statement of Representations Procedure advised that:

- Documents were available to view at Council offices at Mandela House Cambridge and at South Cambridgeshire Hall Cambourne.
- Representations could be received in writing, by e-mail or through the completion of the online planning consultation platform.
- Representations may be accompanied by a request to be notified (i) that the draft charging schedule has been submitted to the examiner, the examiners reports have been published, that the charging authority had approved the charging schedule.

The Councils published a series of questions to help focus representations:

1. Who are you responding on behalf of?
2. Do you wish to participate in the CIL examination?
3. Do you agree that the Council should introduce CIL?
4. Do you agree that the Council has demonstrated a funding gap?
5. Do you agree that the Council has used appropriate evidence to inform the proposed rates?
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?
7. Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?
8. Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?
9. Do you agree that the Council has met all regulatory requirements?
10. The Council is allowed to use 15% of CIL receipts to improve the area close to where development took place. This is known as the 'neighbourhood portion'. Details of how this will work in Cambridge will be worked up over the next 12 months. If you have any comments on how you feel the neighbourhood portion should be distributed, please let us know.

4 Representations received to the consultation

The Councils received 630 comments from 138 respondents. 595 comments relating directly to the questions asked with 35 other comments received. Full representations received through the consultation platform are published on the Councils website. This includes letters where the respondent provided a clear answer to each of the consultation questions.

43 respondents provided representations by letter. Where the letter does not provide a clear answer to each of the consultation questions, the Councils have in good faith summarised the representation and where possible recorded whether the representation reflected a comment, objection, or support. The letters, along with the supporting information, have been published in full on the Greater Cambridge Shared Planning website on behalf of both Councils. Documents containing sensitive information have been reviewed but have not been published.

A small number of respondents used both the online consultation platform as well as submitting a separate letter. Where this occurred, the representation is presented in document '4.1 Representations received through consultation platform' and the Councils summary of the letter is presented in document '4.2 Representations received through letter summarised'. A small number of respondents submitted more than one representation (including duplicate representations). Where this occurred, both representations have been published. A small number of respondents provided online representations that were clearly in the wrong text field. Where this occurred, the Council has reassigned the representation to the best of its ability and in good faith.

5 Respondents per category

Resident	67	49%
Developer/agent/landowner	48	35%
Parish Council	10	7%
Charity/Not for profit organisation/Community Group	8	6%
Public body	4	3%
Other	1	1%

6 Responses to questions

	Comment	Object	Support
Q3. Do you agree that the Council should introduce CIL?	54	23	59
Q4. Do you agree that the Council has demonstrated a funding gap?	30	22	32
Q5. Do you agree that the Council has used appropriate evidence to inform the proposed rates?	32	47	18
Q6. 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?	32	39	21
Q7. Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	35	25	22
Q8. Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	20	11	18
Q9. Do you agree that the Council has met all regulatory requirements?	20	17	18

7 Participation in CIL examination

35 parties expressed an interest in participating in the CIL examination.

8 Format of this report

This report summarises all the comments received following the consultation. Taking each question in turn the Councils have provided a response to all issues raised. A selection of positive and negative comments received have been included in each section to give an overall feeling of respondents were saying and who they were representing.

For specific comments refer to document '4.1 Representations received through consultation platform' which contains verbatim comments received through the consultation platform, document '4.2 Representations received through letter summarised' which contains summarised comments received via letter, and the Councils website where copies of all letters received have been published.

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

The Councils received 136 responses of which 72% were in support of CIL being introduced with 28% opposed. Supporters recognised the benefit of charging all developments a CIL to tackle transport problems and the problem with relying on Section 106 as a solution to this issue. Objectors disagreed with the principle of introducing a tax on development. Others were concerned about the impact that CIL might have on economic growth.

Comments in support of adopting CIL include:

Cambridge Cycling Campaign (Charity/Community Group): "Yes, we support the introduction of a Community Infrastructure Levy. More investment is urgently needed in the sustainable transport network in Greater Cambridge for walking/wheeling, cycling and public transport to be a genuine option for everyone. In addition, building new transport infrastructure requires long-term thinking. Local authorities are best placed to plan and deliver new transport infrastructure when funding mechanisms are long-term and under their own control".

The Cambridge Group of Ramblers (Charity/Community Group): "It is essential that new development contributes to the public good as it is putting additional pressure on existing facilities. Section 106 contributions are inadequate on their own".

Dr Alan Lawrence (a resident): "Yes. There is a significant shortfall in the funding required to create a good transport network for walking and wheeling, and bus funding is unclear. Also the council will be better able to make long term plans given a reliable source of funding as opposed to piecemeal negotiations on S106s".

Comments against adopting CIL include:

Dino Zuvela (a resident): "Public transportation links and utilities have continually worsened, and there is little guarantee that additional levies and charges will directly lead to an improvement for the area's infrastructure. Potentially useful spaces are left unoccupied throughout Cambridge and surrounding areas, and additional levies will further disincentivise future development".

Solon Karapanagiotis (a resident): "In theory, a more investment-friendly policy is not to introduce CIL".

Wellcome Trust (Developer Commercial): "No. WGCL [Wellcome Genome Campus Limited] is fully aligned with the ambition for growth and as a key stakeholder and potential investor, feels passionately about seeing the full potential of Greater Cambridge realised. We understand the challenges to growth, not least the constraints of proper strategic transport infrastructure and understand the potential value of CIL as a possible mechanism to fund strategic infrastructure. WGCL is concerned about the impact of CIL on the deliverability and viability of development. The current economic climate is challenging, and commercial development in particular is sensitive to economic cycles and changes in demand, competition, rents, yields, debt availability, land and other costs. Having a CIL charge (at the proposed rate), in uncertain conditions could have the effect of constraining development altogether. Further, CIL rates cannot be easily reviewed – a full examination process is generally required and so a CIL charge is absolute, it provides little opportunity to be responsive to challenges and changes in the economy / market. To the contrary, Outline Permissions with a s106, whilst legally binding, have mechanisms that enable review in exceptional circumstances. Even if CIL does not have this damaging effect, the mechanics are such that it will not contribute meaningfully to support wider growth. Receipts from emerging site allocations will only arrive at some distant time into the future. Thus, relying on CIL to deliver strategic infrastructure projects required now, is challenging, with little control over obtaining the funding and limited ability to forward plan for such infrastructure projects".

Council response to Question 3.

Developer contributions are secured in one of two ways:

- Section 106 Planning Obligations (s106) are negotiated agreements that seek to mitigate the impact of development. Contributions are secured towards localised community infrastructure. Their strength is in responding to market conditions and providing assurance to decision takers and stakeholders by securing ring-fenced contributions to projects at the point planning permission is granted. Their weakness is that each request needs to be evidenced and specified projects can only be changed to an alternate project with the developer's agreement. Government Guidance published in 2005 (the ODPM Circular 05/2005) unequivocally stated "planning obligations should never be used purely as a means of securing for the local community a share in the profits of development, i.e. as a means of securing a "betterment levy".
- CIL is a planning charge, introduced by the Planning Act 2008, to help charging authorities deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations. New developments that create net additional 'gross internal area' of 100 square metres or more, or create new dwellings, are potentially liable for the levy. The strength of CIL is that it is non-negotiable with receipts capable of being pooled and used to fund broader infrastructure and not just to address the impact of the development. Its weakness is that CIL is only payable on new floorspace and some developments including affordable housing, self-build, and charitable developments is exempt from paying CIL.

Viability and deliverability

Concerns relating to viability, including the view that adopting a CIL will reduce levels of affordable housing, are addressed elsewhere in the report.

Fairness

Some respondents supported the principle of CIL as they believed that there has been a consistent under funding of essential social and physical infrastructure, necessary to support our communities. Others support the introduction of a CIL to ensure that small-scale developments, which currently escape paying significant contributions under s106, contribute to the area's infrastructure.

Previously, all dwellings built in Greater Cambridgeshire contributed to infrastructure.

The Cambridge Plan (2006) required all applicable residential developments to contribute towards open space and recreation improvements (including informal open space, children's and teenage play facilities and indoor and outdoor sports facilities) and towards community facilities to meet the additional need generated by the development (Policy 10/1 Infrastructure Improvements). Each 4-bedroom dwelling built in the city was required to pay £6,142 which with inflation would be equivalent to £9,668 in 2026 (using the Bank of England inflation calculator).

The South Cambridgeshire Development Control Policy DPD (2007) required all residential developments to contribute towards outdoor playing space (including children's play space and formal outdoor sports facilities) and informal open space to meet the additional need generated by the development (Policy DP/4 Infrastructure and New Developments). Later contributions were also secured from all residential developments towards indoor community meeting space. From 2009 each 4-bedroom dwelling built in the District was required to pay £4,258.90 which with inflation would be equivalent to £6,924 in 2026.

In the five years between 2009 and 2014 831 agreements were entered into in relation to minor residential developments (averaging 166 permissions per annum) contributing £4.147m to local infrastructure (equivalent to more than £6.5m in 2026).

In 2014 the Government published a Written Ministerial Statement which said, “Due to the disproportionate burden of developer contributions on small-scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought”. Since then, only major residential development has been required to contribute towards the type of infrastructure that everyone benefits from. Simply put 250 dwellings are built each year on small developments in Greater Cambridge and contribute nothing towards infrastructure.

Adopting CIL is the only way to ensure that all developments (regardless of scale) contribute fairly and proportionately. Were it not for the Government's proposal ('Planning for the Future' White Paper August 2020) to abolish s106 and CIL and replace them with a consolidated Infrastructure Levy (IL) the Councils would have adopted CIL by now.

No to tax

Some respondents are opposed to CIL as a form of tax.

The grant of planning permission results in an (often significant) increase in land value. This value is legally owned by the state because the 1947 Town and Country Planning Act nationalised development rights and therefore the value of those rights. Moreover, development is often only achievable because of the investment made by the public sector. For the last 80 years the Government has attempted to capture this value uplift (often called 'betterment' or 'planning gain'). A report published jointly by the University of Cambridge and the Town and Country Planning Association highlights that since 1945 there have been four separate national taxes on the development value of land in the United Kingdom; the Development Charge (1948-1952), the Betterment Levy (1967-1970), the Development Gains Tax (1973-1976), the Development Tax (1976-1985).

CIL was introduced by Part 11 the Planning Act 2008. In making the Regulations the Secretary of State said the aim to ensure that the overall purpose of CIL is to ensure that costs incurred in supporting the development of an area can be funded (wholly or partly) by owners or developers of land in a way that does not make development of the area economically unviable. The CIL Regulations were introduced in 2010, and it has been adopted by more than half of authorities. By not adopting CIL funding gap has been created.

Section 106 delays and the “wriggling out” of s106 'obligations'

Some respondents commented that the flexibility afforded through negotiated s106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms. Others highlighted that developers were adept at “wriggling out” of s106 obligations.

In introducing the CIL Regulations the Government sought to restrict the use of s106 contributions use in two ways; first by imposing a restriction whereby no more than five s106 contributions could be used to fund an item of infrastructure (the pooling restriction), and second by putting into law three tests (the ODPM Circular 05/2005 used five tests as guidance) stating that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (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.

Whilst amendments to the Regulations have since removed the pooling restriction it is widely accepted that s106 agreements are an ineffective tool as they cannot be used as a means of capturing value uplift achieved from the grant of planning permission, because they cause delays in the planning process, and because the subjective nature and application of the three tests creates the ability for the applicant to negotiate down their contribution to infrastructure. S106 can therefore be attractive to applicants but not always to the planning authorities or those organisations responsible for delivering infrastructure.

It takes 22 weeks on average to complete an agreement following planning committee. For commercial developments the delay is 39 weeks. This is because the finer detail of the agreement takes time to negotiate and requires all parties with a legal interest in the land to sign it.

On 5 March 2025 Cambridge City Council resolved to grant planning permission (ref 24/03088/FUL) for a hybrid application for a) an outline application for the erection of a new retail and food & beverage block and b) a full application for the demolition of existing buildings, enabling works and redevelopment of the site to provide a new building containing office floorspace at 230 Newmarket Road, Cambridge.

Para 8.86 of the committee report highlighted the position of the County Council at that time. It said “The timescales for any future GCP scheme are unknown at the current time, however a financial contribution is sought to assist in the delivery of future GCP schemes within the local area. A total of £1,230,360 is sought, which will be secured via any subsequent S106 Agreement”. Planning Committee resolved to grant planning permission subject to (among other matters) “the completion of a Section 106 Agreement, the precise contributions and wording of obligations delegated to Officer”.

Later, under challenge from the applicant, the County Council amended their position to seek a contribution of “...£767,000 (minus the approx. £200,000 for the Newmarket Road crossing, and £30,000 for a potential residents parking scheme) making it £537,000 for the Eastern Access Scheme”. In the view of the County Council this “...is CIL compliant as this is in scale to other similar developments, and is necessary to help deliver a wider package of measures to improve access by all sustainable modes of transport and mitigate the development”.

One year after planning committee resolved to grant planning permission the s106 agreement will secure (a) a contribution of £30,000 towards Bottisham Greenway (including cycle lane improvements to riverside), (b) a pedestrian crossing across Newmarket Road or the payment of £210,000 in lieu, and (c) a contribution of £30,000 to implement parking restrictions near the site.

Adopting a CIL will mean that many planning permissions can be issued sooner with clarity as to what the application will be required to contribute towards strategic transport infrastructure. This is particularly the case for commercial developments.

There is, however, still a place for s106 agreements and the Councils have adopted the Greater Cambridge Planning Obligation Supplementary Planning Document explaining when contributions are required and how they are calculated. In summary a CIL will be used to fund strategic transport projects and Section 106 agreements will continue to be used to fund site specific transport infrastructure and local infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure.

The concept of CIL is well founded and despite several Government reviews has survived. The focus should therefore be on whether evidence supports the introduction of CIL, whether appropriate rates have been set, and whether it is clear how section 106 contributions will be used once CIL is adopted.

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

The Councils received 84 responses of which 59% agreed that a funding gap had been demonstrated with 41% opposed. Supporters recognised there being a clear funding gap. Objectors said the infrastructure evidence is out of date, that there is no gap, that the gap is smaller than reported, that the gap is larger than reported, that mismanagement is to blame.

Comments agreeing that the funding gap had been demonstrated include:

Cambridge Area Bus Users: "Yes. Cambridge Area Bus Users agrees that the Council has demonstrated a funding gap, however the consultation vastly underestimates its size".

Croudace Homes (Developer Housebuilder): "Yes, the infrastructure statement identifies a significant funding gap between the transport related infrastructure costs, and the committed funding. The funding remains uncertain, as even with the projected CIL money, there is still a large gap, and with inflation and delayed large infrastructure across the region there is still uncertainty as to how the gap will be closed".

Great Shelford Parish Council: "Yes, although the Parish Council does not necessarily agree with all the projects listed in the Infrastructure statement, for example it is opposed to CSET2. It also wishes to note that the scaled-back Sawston Greenway proposals are very disappointing, particularly through the village and Stapleford".

Comments disagreeing that the funding gap had been demonstrated include:

Mr Michael Brown (a resident): "The funding gap would be better closed by not wasting money on absurd schemes such as the "Birthday Cake" roundabout on Milton Road".

Newlands and Tritax (Developer Commercial): "We note that the Chancellor has announced £500m of funding to Greater Cambridge and would query whether that has been accounted for in this exercise. Also, the GCP Draft Budget for 2025/26 shows that £809m is required to deliver the projects. It shows funding of £810m, including a 'local contribution' including circa £27m from New Homes Bonus and £230m assumed Section 106 income. We would query why the full assumed Section 106 obligations sum (£230m) has not been accounted for in arriving at the funding gap".

Wrenbridge (Developer Commercial): "The Infrastructure Statement published in support of the Draft CIL Charging Schedule acknowledges the importance of transport infrastructure to the delivery of growth across Greater Cambridge. While it adequately quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The Statement indicates that the proposed infrastructure programme 'builds on' the adopted 2018 Local Plans for Cambridge City and South Cambridgeshire. Those Plans, in turn, relied on the Transport Strategy for Cambridge and South Cambridgeshire (adopted in 2014). In parallel, the Greater Cambridge City Deal was agreed to support delivery of transport schemes; however, the City Deal programme was never formally assembled to support the emerging Local Plans at that time. As a result, the current project list appears to be carried forward from a historic funding programme, rather than derived from a demonstrable assessment of necessary transport infrastructure. On this basis, the infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence' (PPG Paragraph 020). In its current form, the Infrastructure Strategy does not sufficiently evidence the need of the transport projects it relies upon".

Council response to Question 4.

The CIL Regulations and guidance require charging authorities to identify the total cost of infrastructure they wish to fund wholly or partly through the levy. In doing so, they must consider what additional infrastructure is needed in their area to support development, and what other sources of funding are available, based on appropriate evidence. This process helps the charging authority identify the infrastructure funding gap and a levy funding target.

Information on the charging authority area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken when preparing the relevant plan. This should be set out in an infrastructure funding statement which identifies the infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions, and the choices the authority has made about how these contributions will be used.

The CIL examination will not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant plan. Planning guidance recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. It says that any significant funding gap should be considered sufficient evidence of the desirability of CIL funding, where other funding sources are not confirmed.

The TSCSC and City Deal has not been adequately tested

A respondent comments that the overall package on which the CIL is predicated (the TSCSC and the City Deal) has not been adequately tested to demonstrate the need for the schemes and the relationship with the development strategy.

For Cambridge the transport evidence was addressed in Issue 14 of the Cambridge Plan examination – 'Whether the Plan makes adequate provision for new transport and related infrastructure'. The examiners concluded that "Where necessary the Areas of Major Change identify specific infrastructure requirements. Taken together with the generic policies relating to transport and other infrastructure provision we consider that the Plan makes adequate provision for new infrastructure to support development".

Policy 5: Sustainable transport and infrastructure of the Cambridge Plan states "Development proposals must be consistent with and contribute to the implementation of the transport strategies and priorities set out in the Cambridgeshire Local Transport Plan (LTP) and the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC). Cambridge City Council, Cambridgeshire County Council and developers will work together to achieve the objectives and implement the Cambridge specific proposals in the LTP and the TSCSC, with particular emphasis on securing modal shift and the greater use of more sustainable forms of transport. In addition, Cambridge City Council will work with partners to support the implementation of transport schemes that will improve linkages across the region and by doing so increase the use of sustainable transport modes to get to and from Cambridge".

Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy states "Infrastructure provision will reflect the Council's priorities for infrastructure set out in the Cambridge and South Cambridgeshire Infrastructure Delivery Study and its successor documents. The Council will work positively with neighbouring authorities and Cambridgeshire County Council on infrastructure issues, including the Community Infrastructure Levy (CIL), which the Council is committed to introducing in 2014".

For South Cambridgeshire this was addressed in Issue 15 'Whether the Plan makes adequate provision for transport and related infrastructure'. The examiners concluded that "Subject to the inclusion of the MMs [main modifications] identified we are satisfied that the plan makes adequate provision for transport and other infrastructure requirements".

Policy TI/2: Planning for Sustainable Travel of the South Cambridgeshire Local Plan states "Developers will be required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions and/or the Community Infrastructure Levy (CIL), to address transport infrastructure in the wider area including across the district boundary".

Policy TI/8: Infrastructure and New Developments states "Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. The nature, scale and phasing of any planning obligations and/or Community Infrastructure Levy (CIL) contributions sought will be related to the form of the development and its potential impact upon the surrounding area".

The City Deal states the selected schemes will be assessed to ensure they deliver value for money (where the economic benefits of the scheme exceed the costs of investment and maintenance), contribute to City Deal, Local Plan and Local Enterprise Partnership objectives and can be delivered on time and to budget. Greater Cambridge will use the Department for Transport's Early Assessment and Sifting Tool methodology to support the prioritisation of schemes.

The Greater Cambridge Partnership (GCP) Assurance Framework provides the basis for Membership, Governance and Working arrangements and that projects are prioritised and delivered against four strategic objectives:

- Nurture the conditions necessary to unlock the potential of Greater Cambridge to create and retain the international high-tech businesses of the future.
- Better target investment to the needs of our economy by ensuring those decisions are informed by the needs of businesses and other key stakeholders such as the Universities.
- Markedly improve connectivity and networks between clusters and labour markets so that the right conditions are in place to drive further growth.
- Ease the labour market by investing in transport and housing, in turn allowing a long-term increase in jobs emerging from our internationally competitive clusters and more University spin-outs.

An initial indicative programme based on the TSCSC was established and agreed on 14 August 2014. Schemes under consideration for inclusion in the City Deal programme underwent a high-level assessment in line with criteria agreed between local partners and Government within the Assurance Framework. This ensured that schemes which offered maximum benefits and value for money were prioritised for investment.

Subsequently, the GCP has refined this approach through the development of a Future Investment Strategy (FIS) which includes a series of strategic prioritisation criteria, designed to ensure that schemes are prioritised which have the greatest potential to deliver the City Deal's objectives. The first FIS was drafted in March 2018 and updated in March 2019 (including evidence taken from the 2018 Cambridgeshire and Peterborough Independent Economic Review). It was updated again in December 2020 reflecting on the City Deal's priorities following the first Gateway Review of the Investment Fund.

On 28 September 2023 the Executive Board agreed FIS 3 which recognised that, because of external factors including considerable high inflation within the construction industry, the identified gap between funding to expenditure had increased from £111m to £278m.

The Councils do not agree that the transport evidence has not been tested.

The evidence is out of date and not sufficiently robust for the purposes of setting a Charging Schedule

Respondents have said that the evidence on which the Councils are relying to introduce CIL is dated or is out of date. Some respondents consider that the Council should, or even need, to wait to introduce CIL following the adoption of the Greater Cambridge Local Plan and the infrastructure delivery plan being prepared in relation to that plan. On behalf of several clients a respondent claimed that the transport context, costs and deliverability have changed significantly since 2014.

The evidence is not out of date. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) adopted by Cambridgeshire County Council on 4 March 2014 provides a plan to cope with the rising population and increase in demand on the travel network because of the 44,000 new jobs and 33,000 new homes that the respective Local Plans created in Cambridge and South Cambridgeshire.

The TSCSC identified a series of interventions along each of the corridors. An example of these is the Haverhill to Cambridge corridor. Whilst Haverhill lies in Suffolk, like many of the market towns surrounding Cambridge, it looks to the city as a regional centre for employment, retail and primary healthcare. Along or near the corridor lies a cluster of research and knowledge-based industries at Granta Park, the Babraham Research Campus and nearby at the Genome Campus, all of which are significant employment locations. The principal villages within the corridor are the Abingtons and Linton with other smaller villages located off the A1307. The TSCSC identified a series of short-medium and long term solutions including a Busway/HQPT (high quality public transport) along the line of former Cambridge-Colchester railway.

This scheme is now known as CSET (Cambridge South East Transport) for which a Transport and Works Act Order application was submitted on 9 January 2025. Whilst some parties may disagree with the proposed solution for dealing with congestion along this route (the representation made by Great Shelford Parish Council highlights that it is opposed to CSET2) few would consider that the Haverhill to Cambridge corridor does not still require any long term solution to a problem which will be exacerbated from growth in Haverhill and from job creation at the aforementioned employment sites.

The Infrastructure Statement produced by the Councils, with input from Cambridgeshire County Council and the Greater Cambridge Partnership, explains that in 2018 the cost associated with delivery of the strategic transport infrastructure necessary for the local plans was £855m. The present-day cost exceeds £891m.

At the same time only £618m of funding is identified (including a Government City Deal contribution of £500m and other grant funds).

A gross funding gap of £272m exists and so the Councils are justified in introducing a CIL to help address this gap.

The TSCSC remains relevant and is a fundamental tool in identifying the infrastructure required to accommodate growth and for directing funding sources. It is as relevant now as it was in 2014 and is appropriate evidence in the adoption of CIL.

There is no funding gap because the Government will fund infrastructure

Respondents have suggested that there is no longer a funding gap in large part because of recent speeches made by Rt Hon Rachel Reeves where the Government has promised £800m across the OxCam corridor to fund infrastructure.

On 23 October 2025 Rt Hon Rachel Reeves made a statement in which it was said the government is going further and faster on growth with over £500 million investment for new homes, infrastructure and business space for the Oxford to Cambridge Growth Corridor. It said that up to £400 million of initial government funding will kickstart development in Cambridge with affordable homes, infrastructure and business expansion.

On 17 March 2026, the Rt Hon Rachel Reeves gave the Mais lecture at Bayes Business School during which the following statements were made:

“First, we are backing the Oxford-to-Cambridge Growth Corridor to unleash the potential of our science and technology powerhouses, and the towns and cities between them:

- Investing £2.5 billion in East-West Rail;
- Fast-tracking new reservoirs, in Oxfordshire and Cambridgeshire;
- Backing the expansion of Luton Airport...
- And providing over £500 million for transport in Oxford, housing in Cambridge, and in a new Cambridge Innovation Hub.

We have already announced a consultation on a Development Corporation for Greater Cambridge – and I can today announce that we will consult on a Development Corporation for Greater Oxford too. I am doubling the government’s initial £400 million commitment in Cambridge, making over £800 million available for upfront land acquisition and infrastructure to support these cities to grow”.

Through the City Deal the government has already committed £500m to fund the TSCSC. Further funding has been secured from (for example) the Transforming Cities Fund and Innovate UK funding. The Chancellor’s Spring Budget announced on Wednesday 6th March 2024 allocated £7.2 million for the next phase of developing the Cambridge South East Transport (CSET) programme, ensuring the Cambridge Biomedical Campus is connected and accessible as it grows. Homes England have made around £23m available through a grant to fund the relocation of Waterbeach railway station to support the new town. Government funding has always been required to deliver the growth agenda. Any additional funding will assist but does not in itself remove the need for developers to contribute.

The gap is smaller because section 106 income is greater than reported

Respondents have highlighted that the GCP draft budget 2026/2027 includes a ‘Funding’ item of £230,771,000 for ‘Section 106 contributions’ and that this is considerably higher than the £60m figure that has been used by the Council. If the GCP published figure is accurate, the claim is that the gross funding gap would be significantly smaller (around £100m).

The Councils have undertaken their own analysis of s106 agreements for planning permissions the Councils have issued. This demonstrates that only £60m has been secured including £20m for the Bourn Airfield development. The GCP draft budget figure includes a figure of £186,555,000 for ‘future years budget’. With all allocations now benefiting from planning permission no significant additional funding is expected during the plan period. A list of all Section 106 agreements that has contributed towards GCP projects is published at Appendix A.

The gap is greater than the Council say

Respondents have commented that the gap is larger than that the Councils have published because the Councils have relied almost exclusively on the projects being delivered by GCP. Reference is made to the infrastructure items identified by the Cambridgeshire and Peterborough Combined Authority, such as those outlined in the Bus Strategy, which are crucial for achieving its local transport vision. A respondent states that the infrastructure gap is actually closer to £400m because (a) the cost of CSET is £184m and not £160m, (b) the budget for the Waterbeach busway has been £109.4m since September 2023, (c) other budgeted costs have not been updated to account for construction inflation, and therefore understate the funding requirement.

The Councils do not disagree that the true funding gap may be greater than quoted. The Infrastructure Statement explains that transport projects are identified from various studies and strategies produced including the TSCSC, the LCWIP, Active Travel Strategy, Capital Programme and other development specific proposals. The details of these projects are included in the County Council maintained Transport Proposals Database. Table 7 of the Infrastructure Statement shows TSCSC schemes to be delivered by Cambridgeshire County Council but where the cost of these has not been included in the funding gap.

The Infrastructure Statement further explains the role of the Cambridgeshire and Peterborough Combined Authority and the role of the Local Transport and Connectivity Plan (LTCP) as the Combined Authority's long-term strategy to make transport in Cambridgeshire and Peterborough better faster, greener, and more accessible for everyone. The Councils considered that, with a gross funding gap of £272m being demonstrated it was not necessary to include further transport projects but clearly if those projects had been included then it would have increased the funding gap further.

How will the remaining infrastructure costs be addressed

National guidance has always stated that, whilst CIL is expected to make a significant contribution, it cannot be expected to pay for all the infrastructure required. CIL is expected to generate between £25m and £50m during the plan period to 2031. A funding gap will remain following the introduction of CIL which partners will look to address through other means.

If there is a funding gap, mismanagement of funds is to blame

Strategic transport projects have been prioritised and delivered by GCP. The executive board is responsible for commissioning projects funded by money provided through the City Deal and for overall control of that programme of investments. The board comprises three elected members with full voting rights (one from each of the three partner councils) and two non-voting members co-opted by the executive board; one nominated by the business board, and one nominated by the University of Cambridge.

To unlock the full £500m GCP needed to demonstrate success through two gateway reviews (in 2019 and 2023) both of which were successful. The Councils have no concern regarding the governance or decision making of GCP. In writing to confirm that GCP had passed the 2019 review, Simon Clarke MP, Minister for Regional Growth and Local Government, said: 'We are pleased to see that GCP has made significant progress on its investments over the last five years and are grateful for your work on this.'

Mr Clarke added that the Gateway Review 'highlighted several significant successes across the deal to date' and he commended local partners for their 'focus' on delivering projects in line with local priorities across GCP - and for 'the strong partnership that [GCP] has built to support the successful delivery of the deal and improve the local economy'.

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

The Councils received 97 responses of which 28% expressed the view that the Council had used appropriate evidence to inform the proposed rates with 72% opposed. There was a range of views the majority of which centred on the viability evidence published by the Council. Developers/agent/landowners were responsible for the majority of comments.

Comments agreeing that the Council had used appropriate evidence to inform the proposed rates include:

Bar Hill Parish Council: "Partially. Bar Hill Parish Council recognises that the proposed rates are informed by viability evidence and supporting analysis. However, given the scale of infrastructure requirements identified in the supporting statement, it is not entirely clear whether the proposed rates will generate sufficient revenue to meaningfully contribute towards addressing the identified funding gap. The Parish Council therefore encourages the councils to provide additional justification explaining how the proposed rates have been determined and how they are expected to contribute towards infrastructure delivery.

Histon and Impington Parish Council: "Yes. Yes, broadly but with important caveats that must be recognised. Histon & Impington Parish Council accepts that the viability evidence appears to follow national guidance, including use of residual land value methodology, typology testing and analysis of local market conditions. The approach taken is broadly appropriate for strategic plan-making and for setting indicative CIL rates.

However, we also recognise the limitations raised in the DWP response, which remain important:

The viability assessment is deliberately high-level and does not reflect site-specific costs or constraints, particularly in complex village or edge-of-city locations.

The assessment is sensitive to assumptions about sales values, build costs and developer profit margins, all of which remain uncertain in the current economic climate.

In some scenarios, higher CIL could place downward pressure on affordable housing levels, creating a tension between competing policy goals.

On balance, the evidence is sufficient for consultation, but must be applied with caution going forward. Implementation should allow for appropriate flexibility, monitoring and responsiveness to changing viability conditions.

Jonathan Jones (a resident): "The councils have produced a viability assessment to support the proposed rates. However, this is a high-level area-wide exercise, and the evidence for the precise calibration of the rates particularly the very high office/R&D rate and the decision not to differentiate geographically appears more judgment-based than fully granular".

Comments disagreeing that the Council had used appropriate evidence to inform the proposed rates include:

Biomed Realty: "The viability evidence prepared by BNPP is deemed inaccurate, lacking robustness and market realism to support the proposed CIL rates, raising concerns about its credibility. The assumptions regarding costs, values, and developer margins do not reflect real market conditions, leading to unrealistic conclusions about the feasibility of CIL payments. The introduction of CIL at the proposed levels may undermine policy objectives, negatively impacting sustainability, design quality, and affordable housing provision. There are concerns that the necessary developer engagement as per national guidance has not occurred, questioning the evidence's compliance and soundness. The Infrastructure Statement lacks a clear justification for the identified transport projects and relies on outdated evidence from previous plans and strategies. The current Infrastructure Delivery Strategy indicates that CIL will generate only £50 million, which is insufficient to address the identified funding gap of £222.371 million. The Draft Charging Schedule cannot be justified

based on an infrastructure strategy that is inadequately evidenced and not demonstrably deliverable.

Bloor Homes: "Bloor is concerned about a number of the inputs and assumptions within the BNP Paribas CIL Viability Assessment which has informed the proposed rates as follows:

Benchmark Land Values: the viability assessment applies a BLV of circa £150,000 per gross acre for smaller sites, which may not meet landowner expectations. We would expect BNP Paribas to test a range of say £150,000-£200,000 per gross acre for smaller sites.

Affordable housing values: The capital values which are adopted for the affordable housing tenures are not clear within the report. These need to be set out please, as the blended capital value for affordable rent of £293psf is considered to be too high, especially when it is compared to the private values. With private values at £372psf, the affordable rent would be close to 80% of private values.

External works: although base build costs appear to be reasonable, the application of 10% external works for flats and 15% for houses on base build costs is low in the current market and would not account for any site abnormal development costs, such as earthworks, piling, significant utilities requirement etc. We would suggest that external works are set at a minimum of 20% for all types of housing.

Professional fees: 7% has been applied in all scenarios, which appears to be a little light and should be at least 8%-10% for schemes of a few hundred homes, in order to take account of planning costs and fees.

Biodiversity Net Gain: the costs of BNG can vary significantly depending on the land available on-site and the nature of ecology to enhance. 1.4% of base build costs may not be a sufficient sum, especially if off-site credits are required to deliver 20% net gain in biodiversity. According to Biodiversity Units UK, credits in the south of England range from circa £25,000 to £203,000 per credit.

Sales Rate: The report needs to clarify whether the sales rate of 6 sales per month is for all tenures, or just private units. It should be the case that no more than 3 private sales per month per outlet is applied to the appraisals.

Developers profit: A profit margin of 17.50% on GDV for private residential is inadequate and this should be a minimum of 20% on GDV. With the affordable at 6% affordable, this would still be circa 17.50% on GDV as a whole, which is in the middle of the PPG range for profit in relation to viability assessments.

Lolworth Developments Limited: "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.

Council response to Question 5.

The CIL Regulations and guidance require charging authorities to summarise their viability assessment which should be proportionate, simple, and transparent.

As background evidence, the charging authority should also provide information about the amount of funding collected in recent years through section 106 agreements. Guidance explains how development should be valued for the purposes of the levy and how development costs should be treated.

Summary of comments

The Councils received specific comments regarding the viability appraisals from 32 respondents. The majority of these (22 in number) were from the same four respondents who had submitted representations on behalf of clients. Consequently, the same comments are often repeated.

Bidwells are responsible for nine viability representations. Savills are responsible for seven. Carter Jonas and Lichfields are responsible for three each. Whilst some of these representations were accompanied with supporting information not all were. Some of the supporting information was provided without context or evidence. Comments made on the viability appraisals are summarised as follows:

Rent/Sales

- Comment that industrial use rents are lower than those used by the Councils.
- Comment that purpose-built student accommodation rents are lower than those used by the Councils.
- Comment that there are differences in rents between lab space and offices and that the rent for mid-tech is lower than R&D.
- Comment that yields for prime industrial should be higher.
- Comment that rental values for R&D are third higher in Oxford than in Cambridge and yields 125 basis points stronger than those in Cambridge.
- Comment that the industrial typologies are not reflective of the types of schemes being brought forward in GC.
- Comment that it is not clear whether viability study reflects circulation space for flatted schemes.

Costs

- Comment that build costs in Greater Cambridge are higher than those used by the Councils.
- Comment that no contingency has been allowed for.
- Comment that the profit margin should be 20%
- Comment that fees should be 15%
- Comment that viability testing should incorporate net zero carbon requirements into the evidence base and that the viability report does not consider BREEAM standard
- Comment regards benchmark land value.

Typologies

- Comment that typologies should include co-living and retirement housing.
- Comment that offices, R&D and mid-tech should be reviewed as separate development types.

Other

- Question whether developer engagement has taken place as noted in paragraph 015 of the Planning Practice Guidance.
- Comment that, given the variations in sales values, more than one residential CIL rate should have been set.
- Comment that land values in Greater Cambridge are higher than those in the viability study.
- Comment regarding double counting.
- Comment regarding exemptions that should be applied.

The Councils have explained elsewhere in this report how CIL will interact with s106 agreements including demonstrating with real examples how the impact is largely negligible, especially on those developments already contributing through s106 agreements for transport infrastructure.

The Councils viability consultants (Quintic Advisory previously BNP Paribas) have assessed all the viability representations received and have provided a response to each. This is available at document '5.2 Quintic Advisory response to viability representations'.

Oxford City Council

Some respondents objected to the proposed rate of £175 for offices and R&D buildings with some highlighting that few Councils charge CIL on employment developments.

This rate is comparable to Oxford City Council started charging CIL in 2013. This included a rate (considering indexation) of £33.74 for officer and R&D buildings. The Council adopted a new rate of £168.74 in August 2025 (now equivalent to £176.24). Respondents to the South Cambridgeshire CIL consultation stated that it is too early to draw any meaningful conclusions in relation to its effect on the delivery of development.

The challenges and objections received by the Council were similarly raised to Oxford. In Oxford the examiner explained that opposition focussed on the existing agricultural use value, the premium multiplier, assumptions about development costs, developers profit, infrastructure costs, the allowance for external works, the transparency of the viability appraisal evidence, and the timing of the introduction of a revised CIL rate. The scale of the increase in the proposed CIL rate is raised by several as an issue of major concern.

Despite these objections the examiner considered that the viability assessment was robust and that the rate proposed would not threaten delivery of office/R&D development in Oxford. The examiner concluded that the proposed rates are justified.

There is no demonstrable fall in R&D applications following the revised CIL in Oxford.

On the contrary in October 2025 Carter Jonas submitted a planning application (ref 25/02577/OUT) on behalf of Advanced Research Clusters GP Limited (ARC) for outline application for laboratory-enabled office buildings for research and development with ancillary commercial space (all within use Class E). Provision of car parking, landscaping and pedestrian and cycle route (all matters reserved) at Plots 8200, 8400 And 9200 Alec Issigonis Way And Plot 3000 John Smith Drive Oxford Oxfordshire. The application form says up to 73000 of new office/R&D floorspace will be created meaning a CIL contribution of up to £12.8m in addition to s106 contributions being sought by Oxfordshire County Council towards cycle improvements, bus services, rail.

The Councils consider this real life evidence demonstrates the strong viability of developments in this sector and the support for these rates.

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?

The Councils received 92 responses of which 35% expressed the view that the Council had struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments with 65% opposed. This question provoked responses in relation to the extent to which CIL can close the gap (i.e. should CIL rates be higher) and whether certain sites should be exempt from CIL (strategic residential developments and business parks). Supporters were keen for developers to contribute accordingly whilst highlighting some risks associated with CIL, especially in different market conditions. Objectors claimed that the Council should be charging far more or far less than that being proposed, or not at all. Comments relating to viability continued to be made.

Comments agreeing that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments include:

Dr Nazima Pathan: (a resident) "It is essential that residents no longer bear the burden of developments and their negative impact on the environment we live in. Cambridge is a growth environment and developers should have more input to the cost impact of their profitable builds".

Girton Parish Council: "Yes. Yes, in principle but with recognised risks.

The proposed CIL rates appear proportionate and consistent with national guidance. The distinction between CIL for strategic infrastructure and Section 106 for localised mitigation is appropriate and important for Girton. However, the Parish Council notes the following risks: The assumption that CIL will be absorbed through reduced land values may not hold true where landowners maintain high expectations.

Higher CIL rates on marginal sites could affect the delivery of affordable housing.

Real-world viability may vary significantly in edge-of-city locations impacted by strategic developments such as Darwin Green and Eddington.

Effective monitoring will be required to ensure the balance remains appropriate as economic conditions change.

Girton therefore supports the principle, but emphasises the need for caution, flexibility and a clear approach to viability reassessment where necessary".

Trumpington Residents Association (Community Group): "Yes, we do and note that BNP Paribas' assessment suggests this balance could still be demonstrated with higher rates in real terms of CIL".

Comments disagreeing that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments include:

Bon Ward (a resident): "No - killing the goose that lays the golden egg".

Edward Leigh (a resident): "No. The viability of most sites is determined primarily by the land purchase price. For greenfield sites not in a flood zone, there is usually ample land value uplift to fund all necessary social and transport infrastructure and services, still return a healthy profit to the developer and pay the landowner multiples of the Existing Use Value of the land. The costs of all required infrastructure must be understood at the time the land purchase agreement is struck. Any lack of clarity or changes in policy that require additional funding will inevitably lead to viability assessments and trade-offs, most commonly to the proportion of affordable housing provided.

It appears from the Supporting Statement that the LPAs are not being honest with themselves, developers or landowners about what counts as necessary social and transport infrastructure and services that meet agreed or implied objectives on decarbonisation, biodiversity, social equity and inclusion, public health and activity, and managing traffic congestion.

Take, for instance, the Grange Farm development. The CSET Busway Extension is estimated to cost £30m. That site is proposed to be allocated for 2,589 homes, meaning that the developer contribution for that single piece of transport infrastructure would be £11,600 per dwelling. CSET itself is unfunded, so this development may be expected to contribute towards the cost of that too (since the extension would be worthless without a mostly congestion-free route for buses into Cambridge). There would also need to be new or significantly enhanced active travel routes to employment centres and other destinations along the A11 and A505, which have not been costed.

The Supporting Statement says, "Contributions towards County Council infrastructure (education and transport) varies considerably. Whilst many contributions are not required to contribute anything, other developments have paid the equivalent of £10,000 per dwelling." This might explain the shortfall in funding for the new Waterbeach railway station. More generally, it ignores the fact that much transport infrastructure in the region has been paid for by the Government to upgrade the A14 and A428, build Cambridge North and South railway stations, build the Cambridgeshire Guided Busway, and provide most of the funding for the GCP's infrastructure programme.

In other words, £10,000 per dwelling historically is wholly inadequate to cover the cost of building new schools as well as the transport infrastructure needed to make large developments sustainable in transport terms.

For reference, Hertfordshire County Council collects S106 payments of around £10,000 per dwelling to cover only the cumulative transport impacts of development

This is additional to transport infrastructure that is directly needed to make a site sustainable in transport terms (new road and active travel connections to the site and improved bus services).

It seems clear therefore that Cambridge, South Cambridgeshire and Cambridgeshire are not being anywhere near as ambitious as Hertfordshire about the infrastructure and bus service enhancements needed to support sustainable development or as realistic about the funding required to deliver it.

Only costs that are clearly signalled through policies are priced into land transfer agreements. It is therefore essential that Cambridge, South Cambridgeshire and Cambridgeshire set out clear and realistic infrastructure, service and funding requirements in their policies, including CIL.

If CIL is to help plug the funding gap (which is far larger than the Infrastructure Statement indicates - see answer to Q5), the LPAs should be proposing CIL rates that rise steeply over the next few years to a realistic long-term level. Delay in introducing the higher rate is justified only to allow recent land deals to proceed to a viable planning permission.

Therefore, it is essential that future CIL rates are published now so that they can be priced into future land deals. Annual inflation-based increments will not be sufficient.

Pioneer Group (Developer Commercial): "No. In combination with substantial Section 106 obligations and emerging policy requirements (e.g. BREEAM, affordable workspace, 20% BNG, minimum tree canopy), the proposed CIL charge would erode headroom, risking reductions in design quality, sustainability performance and affordable housing provision, and threatening delivery particularly for brownfield, high cost, phased schemes like the Grafton Centre".

Council response to Question 6.

The CIL Regulations and guidance require charging authorities to strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process.

Charging authorities should think strategically in their use of the levy to ensure that key infrastructure priorities are delivered to facilitate growth and the economic benefit of the wider area.

Zones

Some respondents commented that it is not entirely clear whether the proposed rates will generate sufficient revenue to address infrastructure pressures while maintaining development viability. They say that to address this issue zones should be considered to reflect that developments in some areas can afford to pay more than the proposed rates. Other respondents considered that zones should be introduced to exempt strategic developments and strategic employment sites from paying CIL altogether.

Differential CIL rates may be appropriate in relation to geographical zones within the charging authority's boundary; types of development; and/or scales of development.

In all cases, a charging authority that plans to set differential rates must ensure they consider if rates are set in a way which constitutes a form of subsidy under the UK's new subsidy control regime. Any subsidy which is so provided must be compliant with the requirements and duties set out in the Subsidy Control Act 2022.

The draft charging schedules propose rates by types of development but not by scale or geographical zones. Every new dwelling and office whether it is built in Abbey Ward or Arrington village will pay the same. The reasons for adopting this strategy are as follows:

As a form of taxation CIL should seek to avoid undue complexity. Having a uniformed charge across both Council areas is helpful for agents, landowners and developers.

The proposed CIL is not the primary developer contribution source. S106 contributions will still be secured to mitigate the impact of development. The CIL payment on minor developments is in the region of £5,000 per dwelling and on major residential developments in the region of £3,000 per dwelling (as CIL is not payable on affordable housing). Introducing CIL zones would capture only modest income increases. If the proposed CIL was the primary developer contribution source, in the same way that other Councils have approached CIL, then there would be a stronger case in introducing zones.

It is important to ensure that CIL does not undermine the compliance with broader planning policy objectives at a local and national level. In October 2025, the government and the Mayor of London announced a package of time-limited emergency measures to support housebuilding in London including a new, time-limited, partial relief from borough-level CIL. The CIL introduced across Greater Cambridge will effectively be ringfenced for strategic transport projects. Whilst important it cannot be at the risk of (for example) affordable housing or contributions for the expansion of the local primary school both of which would continue to be secured through a s106. CIL rates should not be set at the margins of viability but rather should include an appropriate buffer which the proposed rates take account of.

CIL should not influence negatively the respective Local Plan strategies for example by driving development to areas with lower CIL rates, especially where those may be the very areas that require the greatest transport investment.

It is not necessary for the Councils to consider exempting strategic development sites from paying CIL because all such sites have the benefit of planning permission and are therefore not liable to pay CIL on any development brought forward under those permissions. Following the adoption of the Greater Cambridge Local Plan it may be appropriate to review any adopted CIL charging schedule, and which may set rates based on geography and/or scale of development. This should not be taken to mean that the CIL rates for allocated sites will be set to £0.

Brownfield versus greenfield

A respondent highlighted that for greenfield sites there is usually ample land value uplift to fund all necessary social and transport infrastructure and services, still return a healthy profit to the developer and pay the landowner multiples of the existing use value of the land, the implication being that the Councils could consider setting rates based on the type of land being developed (i.e. a greenfield rate specific CIL).

The Councils are aware of other Councils adopting such an approach. The draft charging schedule in Uttlesford proposes £200psm on greenfield sites and £100psm on brownfield sites. The adopted charging schedule in West Oxfordshire secures £225 on greenfield land and £125 on land that has previously developed. The Councils are not currently proposing charging different amounts based on existing land uses, not least because for residential development the Vacant Building Credit policy already provides a considerable incentive to brownfield developments. Furthermore, there is no compelling evidence that the Greater Cambridge Area has a significant issue with the viability of redeveloping brownfield land, particularly in Cambridge, where greater densities are often achievable, particularly within its central business district around the station Council. The Councils will keep this under consideration in any future CIL.

Headroom and impact on affordable housing

Some respondents claim that development cannot afford to pay CIL in addition to s106 with some saying that the implication of introducing CIL is that developers would seek a reduction in affordable housing. The Councils are also conscious of the impact of national policy requirements including but not limited to the Building Safety Levy which has prevented some Councils from reviewing CIL charging schedules (as the levy has captured any additional value).

The viability report demonstrates that the proposed CIL can be afforded in addition to existing and proposed planning policy. For residential developments the adoption of the Planning Obligations Supplementary Planning Document means that, whilst unlikely, a development could be expected to contribute up to £20,000 per dwelling where the local infrastructure (particularly schools) cannot cope with the additional demand generated by the development.

The assessment carried out by BNP Paribas assumes a s106 contribution of £25,000 per dwelling thereby providing an additional buffer. Analysis of the s106 requirements of applications validated since the SPD was adopted shows that the s106 requirements for some developments falls below the viability assumptions.

The s106 requirements for an application in Linton (ref 26/00415/OUT) for 100 dwellings on Horseheath Road equates to around £21,000 per dwelling.

The s106 requirements for an application in Stapleford (26/00610/OUT) for 110 dwellings on Mingle Lane equates to around £13,000 per dwelling.

The s106 requirements for an application in Coton (26/01016/OUT) for 80 dwellings on Pendrick Close equates to around £13,000 per dwelling.

These examples demonstrate that there is sufficient buffer in the viability for CIL to be supported across residential developments not currently contributing towards strategic transports (the majority of which already do).

To suggest that introducing a CIL will negatively impact affordable housing provision, because of s106 contributions required by policy, is to misrepresent or misunderstand the premise on which the CIL is being introduced. Analysis of how CIL would impact major developments and strategic development sites has shown little material difference because CIL is replacing a s106 contribution. The net impact shows a marginal increase in overall contribution.

The following examples demonstrate the s106 value for planning permissions that have been issued by the Councils against the likely CIL liability assuming each dwelling is 80m² and 60% of the floorspace is CIL liable.

Planning permission for 1300 homes at land north of Newmarket Road was issued on 30 November 2016 ref S/2682/13/OL. An additional 91 dwellings have been approved with additional contributions secured. The combined deeds secure around £2,400,000 towards transport improvements to the Newmarket Road transport corridor between Airport Way and Elizabeth Way. This is equivalent to around £2,800 per dwelling in 2026. Introducing a CIL would increase the developer's contribution by around £200 per dwelling.

Outline planning permission for 1200 homes at Land North of Cherry Hinton, Coldhams Lane, Cambridge was issued on 18 December 2020 subject to a section 106 agreement completed on 14 December 2020 ref 18/0481/OUT. The deed secures around £2,400,000 for strategic transport, equivalent to around £2,500 per dwelling in 2026. Introducing a CIL would increase the developer's contribution by around £500 per dwelling.

Planning permission for 230 dwellings at Newbury Farm Cambridge was granted on 24 May 2021 ref 19/1168/OUT. The s106 agreement secures £345,000 towards the Greater Cambridge Partnership's Cambridge South East (A1307) Transport improvements to the A1307 between Addenbrooke's and Babraham Park and Ride equivalent to £1,500 per dwelling. If this application was determined once CIL was adopted the s106 contribution would not be required and would be replaced with a CIL payment of around £670,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,041 per dwelling.

Planning permission for 200 dwellings at Netherhall Farm Cambridge was granted on 7 January 2022 ref 20/01972/OUT. The s106 agreement secures £300,000 towards the Cambridge South East Transport improvements for the A1307 between Addenbrooke's and Babraham Park and Ride and which shall specifically be expended by the County Council upon the following: (i) the implementation of SCOOT signal control; (ii) delivery of improvements to the junction of Worts' Causeway with Babraham Road; and (iii) provision a greenway cycle route along the A1307 between Cambridge and Linton equivalent to £1,500 per dwelling. If this application was determined once CIL was adopted the contribution would not be required and would be replaced with a CIL payment of around £576,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,104 per dwelling.

Planning permission for 84 dwellings at 12 to 34 Fanshawe Road Cambridge was granted on 12 November 2024 ref 23/04686/FUL. The s106 agreement secures £152,000 to be used towards the Chisholm Trail equivalent to £1,908 per dwelling. If this application was determined once CIL was adopted the contribution would not be required and would be replaced with a CIL payment of around £245,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,034 per dwelling.

Planning permission for 120 dwellings at Barnwell Local Centre Cambridge was granted on 29 November 2024 ref 23/04687/FUL. The s106 agreement secured £278,000 towards the Cambridge Eastern Access project equivalent to £2,316 per dwelling. If this application was determined once CIL was adopted the CIL contribution would not be required because the development comprises only affordable housing.

Planning permission for 70 dwellings at 137 and 143 Histon Road Cambridge was granted on 12 March 2025 ref 24/01354/FUL. The s106 agreement secures £114,000 to be used towards improvements in the walking and cycling provision on Histon Road. If this application was determined once CIL was adopted the s106 contribution would not be required and would be replaced with a CIL payment of around £200,000. Taking indexation into account introducing a CIL would increase the developer's contribution by around £1,179 per dwelling.

The contribution is not enough and the contribution for transport is not enough

A respondent comments that developers could reasonably be asked to pay higher rates than those set out in the charging schedule. They highlight that the rate proposed for residential developments in Greater Cambridge at £60 per square metre is much lower than those charged by neighbouring planning authorities. Huntingdonshire District Council charges £152/m². East Cambridgeshire District Council charges £70/m² in Littleport and Soham, £123/m² in Ely and £159/m² in the rest of the district. The proposed rate is also less than half of the rate (£125/m²) which was proposed in 2014 for Cambridge City.

Another respondent comments that more money should be directed to transport infrastructure. They say that other Councils (Hertfordshire County Council specifically) secure £10,000 per dwelling for this.

The Hertfordshire County Council Guide to Developer Infrastructure Contributions Technical Appendix 1: Transport explains that each dwelling is required to pay £9,861 (indexed to March 2024) to meet the Active Travel funding gap.

At the same time the Infrastructure Funding Statement 2024/25 explains that the transport and travel contribution for the Harlow and Gilston Garden Town development (10,000 dwellings) was £26,609,823 (equivalent to £2,600 per dwelling). This contribution is directly comparable to the CIL rates proposed in Greater Cambridge. For the Harlow and Gilston Garden Town development the s106 contributions towards transport and travel represented less than 10% of the total value of the deed. Hertfordshire County Council report spending around £1,000,000 to £2,500,000 of s106 contributions each year on transport and travel projects.

As explained further in Question 7 the Councils will continue to use s106 contributions to mitigate the impact of development. As an early adopter of CIL, where the pooling restriction made the continued use of s106 agreements challenging, Huntingdonshire District Council relies heavily on CIL to fund infrastructure. Here s106 contributions are only secured on largescale major development (developments of 200 dwellings or more) although smaller developments can be required to contribute towards outdoor sports space. A development of 100 dwellings in Huntingdonshire can expect to pay around £800,000 in CIL. It is understood that East Cambridgeshire similarly has scaled back considerably the use of s106 agreements as a means of securing developer funding.

Analysis shows that the same development of 100 dwellings built in Greater Cambridge would require the following s106 contributions (assuming the schools are operating at capacity):

Education and libraries: £10,000
Healthcare: £1,000
Open space (including sports and children's play and allotments): £6,000
Indoor community meeting space: £1,500
Green infrastructure: £1,000
Indoor sports space and swimming: £1,000
CIL for strategic transport: £3,000

The total developer contribution in this scenario is around £23,500 (£20,500 for s106 contributions and £3,000 for CIL). With a total developer contribution of £2.35m its is clear the Councils will be seeking greater amounts than those secured by the referenced neighbouring authorities.

The respondent considers that greater importance should be placed on strategic transport infrastructure than other infrastructure typologies. The Councils disagree.

In the above example the contribution for strategic transport represents 13% of the total contribution. This percentage increases where less money is secured for s106 infrastructure. For example, where the s106 provisions total £13,000 then the total allocated for strategic transport increases to 20% of the total developer's contribution.

Broadly speaking therefore, the developer's contribution to strategic transport infrastructure is between 13 and 20% of their total contribution. The Councils consider this is appropriate when compared against competing priorities like education, health, and recreation.

In terms of commercial uses the proposed CIL rates exceed what is currently being secured through negotiated s106 agreements.

Planning permission for the new office and laboratory buildings at the TWI campus Granta Park Great Abington was granted on 24 January 2024 (ref 22/05549/OUT). The s106 agreement secures (a) £481,740 towards the improvement of the cycle route between High Street Babraham and Granta Park, (b) £160,580 towards measures intended to reduce the number of peak hour vehicular trips to the site. Analysis shows the CIL liability for the same development is up to £3,500,000, i.e. an increase of around £2,900,000.

Planning permission for a commercial and business use building at 10A Cheddars Lane Cambridge was granted on 24 January 2024 (ref 23/01457/FUL). The s106 agreement secures £102,400 towards pedestrian and cycle improvement works along Newmarket Road and/or Cheddars Lane/Riverside. Analysis shows the CIL liability for the same development is up to £230,000, i.e. an increase of around £127,000.

Planning permission for the part demolition of existing buildings and erection of new buildings for research and development including co-working space, cafe and gym at The Way Fowlmere was granted on 24 January 2024 (ref 23/02467/FUL). The s106 agreement secures £87,000 for Melbourn Greenway. Analysis shows the CIL liability for the same development is up to £770,000, i.e. an increase of around £684,000.

Planning permission for offices and research and development buildings at land south of Coldhams Lane Cambridge (ref 23/04590/OUT) was granted on 31 January 2025. The s106 agreement secures (a) £500,000 towards a cycle link, (b) £1,766,024 to the Fulbourn Greenway, (c) £679,240 to the Eastern Access project, (d) £271,696 to cycle and pedestrian improvements to the Brooks Road / Coldhams Land roundabout, (e) £407,544 towards the cost of the County Council (or others) delivering the mitigation agreed by the Transport Review Group. Analysis shows the CIL liability for the same development is up to £6,800,000, i.e. an increase of around £3,200,000.

Planning permission for the erection of an office and research and development building at 440 Cambridge Science Park Cambridge was granted on 7 April 2025 (ref 24/01079/FUL). The s106 agreement secures £860,255.50 less the actual cycleway cost towards strategic infrastructure improvement works on the (i) Milton Road corridor and (ii) the Chisholm Trail. Analysis shows the CIL liability for the same development is up to £2,300,000, i.e. an increase of around £1,400,000.

Planning permission for the erection of a research and development / office building at Dales Manor Business Park Sawston was granted on 9 July 2025 (ref 24/01473/FUL). The s106 agreement secures a contribution of £156,000 less the cost of providing footway improvements. The contribution would be used towards the Cambridge South-East Transport (CSET) Route, the Linton Greenway and/or the Sawston Greenway. Analysis shows the CIL liability for the same development is up to £745,000, i.e. an increase of around £590,000.

Planning permission for the conversion and extension of an existing research and development building known as The Franklin Building 2 at Granta Park Great Abington was granted on 1 October 2025 (ref 24/02507/FUL). The s106 agreement secures £98,000 towards CSET phases 1 and 2 or Linton Greenway, but principally to be used for the improvement of the cycle route between High Street Babraham and Granta Park. Analysis shows the CIL liability for the same development is up to £490,000, i.e. an increase of around £398,000.

Securing more from commercial developments, which can demonstrably afford to pay more, will ensure that key infrastructure priorities are better funded and greater certainty over delivery is achieved.

Research and development uses

Representations seek to justify why business and science parks should be exempted from CIL (including through the introduction of zones) because negotiated s106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.

The above analysis shows that s106 agreements are not securing as much money as developments can afford to pay. Furthermore, requiring a s106 agreement that include contributions towards strategic transport infrastructure can be evidenced to be the direct cause of delays in a planning permission from being issued. S106 transport contributions are also variable whereas CIL would introduce a stable expectation of development types, helping achieve faster permissions and level the playing field.

In maintaining S106 as a mechanism for securing transport contributions, there is also the risk that a more robust application of CIL regulation 122, particularly where challenged on appeal, can diminish its efficacy. This was underlined by the Hobson Street Cambridge appeal (APP/Q0505/W/25/3365274) where the Planning Inspector was unable to conclude that a request of £125,000 made by Cambridgeshire County Council towards the Hills Road corridor improvement scheme met the statutory tests.

On the developers side this latest point can be highlighted in the vast variation in transport contributions sought by Cambridgeshire County Council across the District and the challenge this creates in land acquisition. All these considerations point towards CIL as the solution for securing developer contributions on business and science parks.

Hotels and retail uses

A respondent commented that the rates for hotels and retail uses appeared to be low and yet the disruption caused by these developments can be considerable, especially for pedestrians.

The disruption caused is understood but should be minimised through the appropriate application and enforcement of planning conditions and highways agreements completed with Cambridgeshire County Council rather than through CIL.

CIL income

One respondent (commenting on behalf of several clients) repeated the statement that CIL is not worth introducing because £50 million “would fund only a small fraction of the identified projects”.

Analysis undertaken by the Councils highlight that introducing CIL will generate more funding than is currently being secured from negotiated s106 agreements for reasons previously explained in the report.

It is not agreed that £50m over the plan period constitutes a “small fraction” as a reason for not proceeding. Rather it reflects a total contribution equivalent to around 20% of the funding gap which is meaningful.

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

The Councils received 82 responses of which 47% expressed the view that it is clear how CIL will operate alongside Section 106 Planning Obligations with 53% opposed.

Comments agreeing that it was clear how CIL will operate alongside Section 106 Planning Obligations include:

Gamlingay Parish Council: "Yes. However further detail is needed about how this will operate in the rural areas of Greater Cambridge, securing infrastructure for villages".

Jeremy Baumberg (a resident): "Yes. It is clear that this is a modest CIL, given that Section 106 is still the main resource".

Places for People (Developer Housebuilder): "Yes, it is clear how CIL will operate alongside Section 106 obligations and this has been clearly defined in the consultation".

Comments disagreeing that it was clear how CIL will operate alongside Section 106 Planning Obligations include:

Abbey Properties Cambridgeshire Limited: "It is not clear and clarification through the examination would be essential. It would be appropriate to adopt a SPD alongside the CIL schedule (if adopted)".

Cambridge Past Present and Future (Charity): "No. The current proposal creates a "bun fight" where transport infrastructure is positioned to receive its funding slice first. This creates an inequitable system where:

- Transport is prioritised at the expense of other essential services.
- Health, education, and green infrastructure remain reliant on Section 106, which will continue to fail to capture contributions from smaller sites. We argue that for a 'balance' to be struck, all infrastructure types must be funded equitably to address existing service shortfalls".

Trinity College (Developer Commercial): "The relationship between CIL and S106 for strategic sites requires clarification and is not adequately addressed. At present:

- There is insufficient explanation of the circumstances in which S106 obligations will be used to address infrastructure requirements at strategic sites rather than, or in substitution for, CIL.
- The Infrastructure Statement does not clearly identify which elements of the infrastructure programme are intended to be delivered through S106 at strategic sites, and which through CIL receipts.
- There is no clear explanation of how the Councils will avoid the double-counting of infrastructure contributions where a strategic site is already making substantial S106 commitments (for example, in relation to transport, utilities, public realm and employment floorspace delivery).
- There is no flexibility for employment led sites (the Councils merely identify a reduction in affordable housing on residential sites as a 'safety value' to overcome viability issues).
- There is no clarity on when infrastructure funds will be spent to support the delivery of strategic sites.
- Whereas 100% of s.106 contributions which are identified as mitigation for strategic transport will be spent on strategic transport, that is not the case for CIL whereby a significant proportion will be earmarked for other uses, significantly reducing the monies available for investment in strategic transport".

Council response to Question 7.

Planning guidance reaffirms that CIL is not intended to make individual planning applications acceptable in planning terms. As a result, some site-specific impact mitigation may still be necessary for a development to be granted planning permission. Some of these needs may be provided for through the levy but others may not, particularly if they are very local in their impact. There is still a legitimate role for development specific planning obligations, even where the levy is charged, to enable a local planning authority to be confident that the specific consequences of a particular development can be mitigated.

Authorities can choose to use funding from different routes to fund the same infrastructure. Authorities should set out in infrastructure funding statements which infrastructure they expect to fund through the levy and through planning obligations.

Charging authorities should work proactively with developers to ensure they are clear about the authorities' infrastructure needs and what developers will be expected to pay for through which route.

The confusion between how the Councils intend operating CIL and s106 is understood because CIL charging authorities' approach this differently to one another tailoring the approach to their own specific needs. With the pooling restriction not being withdrawn until 2019 early CIL adopters curtailed significantly the use of s106, often limiting its use for larger developments (and at times exempting those sites from paying CIL).

The Councils consulted on a joint Planning Obligations Supplementary Planning Document in 2024 and 2025. The SPD explains when contributions are required and how they are calculated. The SPD was adopted by Cambridge City Council in March and by South Cambridgeshire District Council in February 2026.

As confirmed through the Supporting Statement CIL will be used to fund strategic transport projects and s106 agreements will continue to be used to fund local infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure.

Some respondents have questioned whether the Councils approach leads to double counting. Respondents have asked whether a development would still be liable to pay s106 contributions for transport projects in addition to CIL.

The answer is that s106 contributions would no longer be sought towards strategic transport infrastructure projects and that s106 contributions and/or s278 agreements would still be required in relation to transport infrastructure that would not be necessary were it not for the development.

To demonstrate how this would work in practice the Councils have provided three examples of planning permissions granted in recent years.

Example A Hauxton Waste Water Treatment Works. 23/03080/OUT. Outline planning permission for the demolition of existing structures and redevelopment for employment (office and laboratory) floorspace alongside a new amenity building, country park and associated infrastructure at the former waste water treatment works Cambridge Road Hauxton was granted by South Cambridgeshire District Council on 25 July 2024. Through both planning conditions and planning obligations the immediate and broader impact of the development has been mitigated. Planning conditions secured (a) pedestrian and cycle infrastructure including the provision of a greenway to connect to a proposed mobility hub to the north and link to Haslingfield Greenway and public footpath to the

south-west; internal pedestrian and cycle links; and the accesses onto the A10, (b) a travel plan and parking management plan, and (c) a minibus service including hours of operation, number of services and days of service to be provided from the date of first occupation of the development and maintained in perpetuity. Planning obligations secured (a) the provision of two bus shelters, (b) a maintenance contribution of £20,000 in relation to those bus shelters, (c) a car park management plan, (d) a contribution of £5,000 towards the cost of introducing road signage and markings in the vicinity of the development restricting vehicle waiting times/periods, (e) a transport mitigation contribution of £682,000 towards Melbourn Greenway and/or South West Travel Hub. If this application has been approved following the adoption of CIL the only difference would be the removal of the £682,000 towards Melbourn Greenway and/or South West Travel Hub (a GCP related project) which would be replaced by the CIL payment.

Example B Station Road Longstanton. 20/03598/OUT. Outline planning for the demolition of a single dwelling and development of up to 107 dwellings and employment/community/ cafe development at Land West of Station Road Longstanton was granted by South Cambridgeshire District Council on 11 July 2022. Through both planning conditions and planning obligations the immediate and broader impact of the development has been mitigated. Planning conditions secured (a) travel Plan and appointment of a travel plan co-ordinator, and (b) footway/cycleway along the frontage of Station Road. Planning obligations secured (a) a contribution of £46,000 towards the improvement of connectivity between the development and Northstowe and/or Phase 1 and the Waterpark, (b) a contribution of £114,000 toward the provision of new cycle routes, or the improvement of existing cycle route which serve the development between Longstanton and Bar Hill and the St Ives Greenway, and (c) £96,000 towards the Cambridge Guided Busway capital cost. If this application has been approved following the adoption of CIL the contribution reference (c) would still be secured through a s106 with all of the financial contributions replaced by the CIL payment.

Example C Westbrook Centre Cambridge. 24/00622/FUL Planning permission for the demolition of existing buildings, retention and re-use of part of the undercroft parking structure, erection of employment floorspace at Westbrook Centre, Milton Road, Cambridge was granted by Cambridge City Council on 3rd September 2025. Through both planning conditions and planning obligations the immediate and broader impact of the development has been mitigated. Planning conditions secured a travel plan and parking management plan. Planning obligations secured (a) a contribution of £100,000 towards improvements to Jesus Green (including Rouse Ball Pavilion redevelopment), (b) pedestrian and cycle link schemes for Corona Road, Lilywhite Drive, and a permissive path scheme at Fellows House (where these schemes are not delivered £10,000 per scheme would be paid to Cambridge City Council), (c) a contribution of £15,000 towards controlled parking zone implementation, and (d) a contribution of £278,794 towards sustainable transport improvements at Milton Road / Mitcham's Corner. If this application has been approved following the adoption of CIL the only difference would be the removal of the £278,794 towards sustainable transport contributions at Milton Road / Mitcham's Corner (a GCP related project) which would be replaced by the CIL payment.

These three examples demonstrate in a practical sense how CIL and s106 would operate in the future.

Put simply localised interventions including the provision of a new pedestrian crossing point, the widening of an existing footpath, the provision of bus shelters, contributions to install real time passenger information displays at an existing bus shelter, contributions to fund additional waiting restrictions, travel plan monitoring would continue to be required and secured through planning conditions and planning obligations. CIL would replace the contribution currently being paid through a s106 for strategic transport.

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

The Councils received 49 responses of which 62% agreed that the draft instalment policy strikes the right balance between income and developer cashflow with 38% opposed. There was a balance of comments many of which consider the draft instalment policy to be fair. Some respondents considered the policy to be too generous. Specific requests were made to review the thresholds based on build out rates.

Comments in favour of the draft instalment policy striking the right balance between income and developer cashflow include:

Cambridgeshire ACRE: "Cambridgeshire ACRE considers that the proposed instalment policy appears proportionate and provides a reasonable balance between ensuring timely collection of CIL receipts and recognising the cashflow constraints faced by developers. Staged payments for larger liabilities should help maintain development viability while still ensuring that infrastructure funding is secured. It will be important that the approach allows infrastructure investment to be delivered in a timely way so that communities see the benefits of development alongside growth".

Henry Boot Developments (Developer Commercial): "Support is given to South Cambridge District Council's proposed instalment policy, particularly in respect of projects with a CIL Liability of over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months".

Mrs Marilyn Ballisat (a resident): "Yes the balance is fair to developers and the council".

Comments against the draft instalment policy striking the right balance between income and developer cashflow include:

Cambridgeshire County Council and Prologis (Developer Commercial) "No, the thresholds are considered to be too low given the scale of payments that may be generated by the proposed CIL rates. We request that these are extended to improve the viability of development proposals. For very large contributions, the instalment policy should take a longer term approach. In Oxford the instalment policy for sums over £2m is: 1st instalment, 25% within 60 days; 2nd instalment, 25% by end of year 1; 3rd instalment, 25% by end of year 2; 4th instalment, 25% by end of year 3. This approach should be replicated given the similar CIL rates proposed".

Mr Zbigniew Ulanowski (a resident): "No, the policy is overly generous to developers".

Urban and Civic (Developer Housebuilder and Commercial): "No. The instalment policy has been designed with no obvious consideration of the cashflow profile of strategic scale development. On a Super Strategic Site, the master developer, not the housebuilder, bears the upfront capital risk: the multi-year negative cashflow period, the infrastructure-first investment, and the planning complexity. Urban&Civic, as master developer, commits its capital before housebuilders are on site. Any CIL liability would fall, in practice, on the entity least able to absorb a fixed, irrecoverable charge against a structurally negative cashflow position in the early phases of delivery. The housebuilder customers who build on our fully-serviced and de-risked parcels do so against a transparent cost structure. Introducing CIL into that structure, with crystallisation at outline consent or Key Phase Approval, would alter the investment arithmetic in ways that cannot be mitigated by instalment scheduling. The instalment policy addresses the timing of payment; it does not address the more fundamental problem that CIL, as an instrument, is structurally challenging with the economics and delivery mechanics of Super Strategic Sites".

Council response to Question 8.

The CIL Regulations and guidance states that where no instalment policy is in place, someone has assumed liability and a commencement notice has been submitted (and the authority has not determined a deemed commencement date), then payment is due in full at the end of 60 days after the intended commencement date.

Where a charging authority wishes to allow payment by instalments, they must have published an instalment policy on their website. An instalment policy can assist the viability and delivery of development by taking account of financial restrictions. Willingness to allow an instalments policy can be a material consideration in assessing the viability of proposed levy rates.

Where the planning authority is willing to accept it, a planning permission for a development can be subdivided into 'phases' for the purposes of the levy. This is expected to be especially useful for large scale development, which is an essential element of increasing housing supply. The principle of phased delivery must be expressly set out in the planning permission.

To understand the impact of the instalment policy it is appropriate to review when s106 contributions for strategic transport projects (which CIL is replacing) are paid.

23/00835/FUL for office and lab space at 460 Milton Road Cambridge secured a "Strategic Transport Contribution" of £460,833 towards strategic infrastructure works on the Waterbeach Greenway. The contribution is to be paid prior to completion of the deed.

23/04686/FUL for the erection of 84 dwellings at 12-34 Fanshawe Road secured a "Transport Contribution" of 152,000 towards the Chisholm Trail. The contribution is to be paid prior to occupation of 50% of the dwellings.

23/04687/FUL for the redevelopment of the local centre including 120 dwellings at Barnwell Local Centre Barnwell Road Cambridge secured a "Cambridge Eastern Access Contribution" of £278,000 towards the Cambridge Eastern Access project. The contribution is to be paid in full prior to first occupation.

24/00889/FUL for the extension to Clarendon House on Clarendon Road Cambridge secured a "Hills Road Corridor Improvement Scheme Contribution" of £119,490 towards the Greater Cambridge Partnership Hills Road Corridor Improvement Scheme. The contribution is to be paid in full prior to commencement of development.

24/01354/FUL for the erection of 70 dwellings at 137 and 143 Histon Road Cambridge secured a "Transport Contribution" of £114,000 towards improvements in the walking and cycling provision on Histon Road. Half of the contribution is paid prior to occupation of any dwellings with the balance prior to the occupation of half of the dwellings.

24/01473/FUL for the erection of a research and development / office building at Dales Manor Business Park Sawston secured a "Transport Contribution" of £156,000 towards the Cambridge South-East Transport (CSET) Route, the Linton Greenway and/or the Sawston Greenway. The contribution is to be paid prior to occupation of the development.

S/3440/18/OL for a new mixed-use village comprising residential development of approximately 3500 dwellings and mixed uses comprising employment retail hotel leisure residential institutions at Bourn Airfield secured a "Cambourne to Cambridge Busway Contribution" of £20,000,000 towards the delivery of the Cambourne to Cambridge Busway. The contribution is paid in five equal instalments (20%) prior to the occupation of 501 dwellings, 1000 dwellings, 1500 dwellings, 2000 dwellings, 2500 dwellings.

This analysis demonstrates that strategic transport contributions are generally secured early in the development and typically before occupation. For larger developments the contributions are staggered to reflect cashflow.

The draft instalment policy consulted on by the Councils means that the full CIL payment is made 420 days after commencement. Where the CIL liability is up to £50,000 full payment is due within 120 days of commencement. Where the CIL liability is between £50,000 and up to £250,000 half of the payment is due at 120 days with the balance at 240 days. Where the CIL liability is between £250,000 and up to £500,000 a quarter of the payment is due at 120 days, half at 240 days and a quarter at 360 days. Where the CIL liability exceeds £500,000 a quarter of the payment is due at 120 days, a quarter at 240 days, a quarter at 360 days, and a quarter at 420 days.

Analysis undertaken ahead of the consultation demonstrated that each charging authority has adopted different instalment terms. Broadly speaking most Councils have between three and five thresholds with the total CIL liability dictating how much falls due and when.

Huntingdonshire District Council has five payment thresholds where the final threshold is for payments of £500,000 or more and requires the final payment (25%) to be made within 720 days of commencement.

East Cambridgeshire District Council has five payment thresholds where the final threshold is for payments of £1,000,000 or more and requires the final payment (30%) to be made within 540 days of commencement.

Peterborough City Council has three payment thresholds where the final threshold is for payments of £500,001 or more and requires final payment (25%) to be made within 720 days of commencement.

Bedford Borough Council has four payment thresholds where the final threshold is for payments of £500,000 or more and requires final payment (25%) to be made within 540 days of commencement.

Oxford City Council has three payment thresholds where the final threshold is for payments of £500,000 or more and requires final payment (25%) to be made within 1095 days of commencement.

Many CIL charging authorities use CIL as a primary funding source and so with a greater CIL liability, greater consideration needs to be taken in relation to instalment payments. For residential developments in Greater Cambridge the CIL payment is largely equivalent to the value of existing s106 payments and which are currently due early in the development. A development of 100 dwellings would generate a CIL liability of around £300,000. The instalment policy would require £75,000 within 120 days of commencement, £150,000 within 240 days of commencement and £75,000 within 360 days of commencement. For residential developments the instalment policy is fair.

For commercial developments the CIL payment will in many cases be greater than the value of existing s106 payments. The draft instalment policy would likely require CIL to be paid prior to occupation.

The Councils propose extending the final payment (at the present higher threshold) from 420 days to 480 days and add a fifth instalment threshold for CIL liability exceeding £1,000,000 where 20% of the CIL liability is due at the following days from commencement: 120, 240, 360, 480, 600.

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

The Councils received 55 responses of which 51% expressed the view that the Council has met all regulatory requirements with 49% opposed. Opponents considered that the regulatory requirements had not been met because of concerns regarding the viability assessment, the adequacy of the infrastructure list, whether developer engagement has been proportionate and representative, the lack of reference to CIL Reg 43 Mandatory Charitable exemption and CIL Reg 44 discretionary charitable exemptions.

Comments in favour of the Council having met all regulatory requirements include

Croudace Homes (Developer Housebuilder) "Yes, the Council has met its regulatory requirements through consultation".

Little Wilbraham and Six Mile Bottom Parish Council: "We agree that the council has met all its regulatory requirements".

Marilyn Ballisat (a resident): "Yes regulatory requirements are met".

Comments against the Council having met all regulatory requirements include

Hill Residential (Developer Housebuilder): "The respondent questions whether the regulatory requirements have been met. 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. 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 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 GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. In particular the emerging GCLP does not consider large-scale residential schemes within are not considered as a sui generis source of infrastructure funding within the evidence base. 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 VR, mean that the approach to viability testing is not robust".

Redrow Homes (Developer Housebuilder): "As above, until such time as the viability information which underpins the draft CIL charging schedule is resolved, Redrow reserves the right to consider that not all regulatory requirements have been met".

Trinity College (Developer Commercial): "The evidence base does not meet Regulation 14 requirements for R&D typologies, particularly regarding construction costs and economic viability. The Viability Report fails to model construction costs for specialist R&D and laboratory buildings as a separate development typology. The Viability Report does not apply appropriate net-to-gross ratios for laboratory buildings. The report does not account for the full costs of compliance with Local Plan sustainability policies for energy-intensive R&D uses. The evidence base does not prove that proposed commercial rates will not jeopardise the viability of specialist R&D development in Greater Cambridge. A supplementary R&D-specific viability appraisal should be conducted, published, and consulted on before the Draft Charging Schedule is submitted for examination".

Council response to Question 9.

The CIL Regulations and guidance explain how a draft charging schedule is prepared and consulted upon including how it is advertised and how parties are notified. 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.

Many of the comments and objections reinforce representations made to other questions in particular the Councils viability assessment and the funding gap. These issues have been addressed by the Councils earlier in the report.

Whether developer engagement has been proportionate and representative

Officers gave an online presentation to Cambridge Ahead on 27 February and an in-person presentation to the Cambridge Development Forum on 6 March to explain the rationale for introducing a CIL across Greater Cambridge, the future relationship with Section 106 planning obligations, and how representations to the consultation could be made. The Councils viability consultants (Quintic Advisory previously BNP Paribas) gave an online presentation to developers and agents on 11 March.

Cambridge Ahead describes itself as a deeply committed, long-term voice for the Cambridge economy, dedicated to good growth that improves quality of life. On behalf of its (circa) 50 members they produce data-driven insight, collaborate with policymakers, and champion the contribution Cambridge city region makes nationally and locally.

Cambridge Development Forum describes itself as a collaborative platform Chaired by The Rt Hon. Lord Lansley CBE dedicated to supporting sustainable growth and development across four key regions: Cambridgeshire, Thames Valley, Greater Cheshire, and Norfolk & Suffolk. The UKDF acts as a strategic voice, championing practical solutions to planning challenges and advancing the efficient delivery of high-quality, sustainable housing and commercial development. It has over 30 Members.

48 representations have been received by developers or land owners demonstrating how well the consultation was publicised. The Council considers that developer engagement has been proportionate.

Lack of reference to Regulations

Some respondents considered there to be a lack of reference to Regulations including Reg 43 Mandatory Charitable exemption, Reg 44 discretionary charitable exemptions, and Reg 59A the Duty to pass CIL to local councils.

The application of mandatory relief is set out in the regulations and the lack of reference to it (or an explanation of whether specific landowners are eligible to claim it) does not mean that the Council has not met its regulatory requirements in relation to the consultation on the draft charging schedule.

There is no requirement to publish a policy relating to discretionary relief ahead of the adoption of CIL. There is no requirement for the Council to publish an exceptional circumstances relief policy ahead of the adoption of CIL.

The regulations required the charging authority to pass 15% of the relevant CIL receipts to the Parish Council for that area. This increases to 25% where that area has a neighbourhood development plan in place. The Councils will work closely with Parish Councils following examination to ensure the impact of CIL is well understood.

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

The Councils received 55 representations. General comments on this question include:

Cambridge Ahead: "Cambridge Ahead supports the principle that communities where development takes place should benefit directly from investment through the neighbourhood portion of CIL. Where significant sums are generated, it will be important that there is clear governance, transparency and accountability around how funding decisions are made and how money is spent. Regular reporting on allocation and expenditure would help maintain confidence that funds are being used effectively and in a timely way. Cambridge Ahead would welcome further consideration of how this would operate in practice. There may also be opportunities for neighbouring areas to work together where appropriate to deliver projects that benefit a wider community".

Cambridge Biomedical Campus (Developer Commercial): "We support the idea that a proportion of the CIL is spent locally on improvements related to the strategic transport schemes it is supporting. We encourage early engagement with the active communities in the area around the Campus. We are happy to provide the contact details of those groups with whom we work closely".

Edward Leigh (a resident): "Ensure that properly-constituted community, youth, public health, environmental, wildlife and other local organisations are eligible to apply for a share of the neighbourhood portion. To ensure transparency, funding bids should be considered at public forums - parish councils where they exist and community/area forums of elected councillors elsewhere. This would provide a strong purpose and justification for reviving area committees/forums covering the whole of Cambridge, not just areas of new development, as currently".

Hannah Brown (a resident): "Third, I disagree that the proportion for funding for sites neighbouring development areas should be as low as 15%; it should be higher. The neighbouring areas to development often experience greater demand on resources- road infrastructure, schooling, plays pace and GP access therefore a greater proportion should be seen to be locally available to those most impacted".

Maria Carvalho (a resident): "It should be used to fund neighbourhood teams and projects. Remove barriers. Asset based community development. A pot of funding to encourage a new way of working to best support residents needs".

Maria Cleminson (a resident): "We agree that CIL is preferable to S106 and believe that local councillors should decide about the 15%. It is vital that it is in the hands of our democratically elected representatives to whom we can appeal directly".

Mr Mike Evans (a resident): "The question is inappropriate for consultation. If we do not know how the details will be decided then we do not know how to respond. My suggestion is that local ward councillors should be able to decide how the 15% is spent after consulting with their residents. The money should be spent in the ward the development happens in".

Ms Shelley Gregory-Jones (a resident): "Small, local wildlife charities like Cambridge Hedgehogs are in need of support to enable them to provide education services to residents and hospital services for injured and sick hedgehogs. Across the UK hedgehogs are an endangered species, but Cambridge has a significant urban population and, as a community, we have a responsibility to protect and care for it".

Other comments

The Councils received 52 other comments the majority of which were made by the same agent and so the same comments have been repeated. These focus on relief.

Comment: That Discretionary Charitable Relief should be offered by the Councils

Council response: Several respondents have commented that, as registered charities, they would expect Mandatory Charitable Relief to apply where development is used wholly or mainly for its charitable purposes, including the provision of student accommodation for its own students. However, they say, the position is less clear for accommodation developed by the respondent but occupied by students from other Colleges, or where the development forms part of the Colleges wider investment activities. Given the collegiate structure of Cambridge and the way in which Colleges routinely share facilities and accommodation, it is essential that the Councils set out how they intend to interpret the statutory tests.

A collecting authority may give discretionary investment relief where:

- the charging authority has given notice that discretionary charitable investment relief is available in the area; and
- the whole or 'greater part' of the chargeable development will be held by the claimant, or by the claimant and other charitable institutions, as an investment from which the profits will be applied for charitable purposes; and
- that portion of the chargeable development to be held as an investment will not be occupied by the claimant for ineligible trading activities; and
- the charging authority must act in compliance with the requirements and duties set out in Subsidy Control Act 2022 when any exemption or relief is granted.

On 7 April 2025 South Cambridgeshire District Council granted planning permission (ref 24/01079/FUL) for the Erection of a Research and Development / Office building at 440 Cambridge Science Park. The applicant was the Master Fellows and Scholars of the College of the Holy and Undivided Trinity within the Town and University of Cambridge of King Henry the Eights Foundation. The s106 agreement secured £860,255.50 to be applied by the County Council towards strategic infrastructure improvement works on the (i) Milton Road corridor and (ii) the Chisholm Trail. On face value this application may be capable of benefitting from a Discretionary Charitable Relief. To apply a Discretionary Charitable Relief where this level contribution (in the least) is demonstrably affordable would be perverse and contrary to the objective of the Councils securing more money for strategic transport contributions across the area. For the avoidance of doubt the Councils can confirm that they are not proposing the introduction of Discretionary Charitable Relief

Comment: That Exceptional Circumstances Relief should be offered by the Councils

Council response: Several respondents have commented that the Councils should introduce exceptional circumstances relief.

Exceptional circumstances relief can be considered where a s106 agreement is in place in relation to the planning permission for the development. A charging authority can give relief from the levy if it deems that the levy would have an unacceptable impact on the viability of a development. There is no statutory definition of what constitutes the viability of a development. The charging authority has the discretion to make judgements about the viability of the scheme in economic terms, however, it is important to ensure that any relief is based on an objective assessment of viability as set out in viability guidance.

The Councils are not at this time considering allowing Exceptional Circumstances Relief and will keep this under review.

Comment: That a policy relating to payments in kind should be published

Council response: A respondent commented specifically on the delivery of strategic site infrastructure. They 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 support this approach. They expressed 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. They suggested that a policy allowing CIL infrastructure payments in kind be published to allow direct delivery of relevant infrastructure by the developer in accordance with Regulation 73 and 73A. Allowing CIL payment in kind for land for infrastructure and for direct delivery of infrastructure on strategic sites will, they said, encourage early infrastructure delivery within schemes, taking into account the relevant cost to developer in doing so. In particular, the use of land and infrastructure payments in kind would be more effective than removing CIL liability.

The ability to pay CIL in kind can be useful in circumstances where the charging authority and the person liable for the levy wish land and/or infrastructure to be provided, instead of money, to satisfy a charge arising from the levy. Subject to relevant conditions, and at its discretion, an authority may enter into an agreement for a land payment to discharge part or all of a levy liability (regulation 73). Charging authorities may also enter into agreements to receive infrastructure as payment (regulation 73A).

For this to be an option the charging authority must publish a policy document which sets out conditions in detail (regulation 73B). This document should confirm that the authority will accept infrastructure payments and set out the infrastructure projects, or types of infrastructure, they will consider accepting as payment.

Where the levy is to be paid as land or infrastructure, a land or infrastructure agreement must be entered into before development commences. This must include the information specified in regulation 73A.

To determine how much liability the 'in-kind' payment will off-set the land or infrastructure must be valued by an independent valuer who will establish its value or cost.

Because the CIL proposed for Greater Cambridge is to cover strategic transport infrastructure there are fewer instances for payment in kind to be applied.

For example, other charging authorities may agree for the delivery of a new primary school to be facilitated through an in kind policy in lieu of CIL which would ordinarily have been used. The charging authority may introduce a broad in kind policy relating to (for example) primary schools, community centres, sports pavilions. In Greater Cambridge such facilities would be delivered through a planning obligation meaning a narrow in kind policy is required.

The Councils agree that adopting an in kind policy enables different ways of strategic transport infrastructure to be delivered (especially in relation to sites proposed through the Greater Cambridge Local Plan) and will consider the introduction of a policy relating specifically and exclusively to land or infrastructure relating to strategic transport.

Appendix A Section 106 contributions for GCP projects

App No	Deed Date	Site Address	Ward	District	Type	Clause	GCP Summary Detail	In Kind Value
14/0887/FUL	3/10/14	Garages 11 - 45 Ekin Road Cambridge Cambridgeshire	Abbey	CCC	Transport Contribution - ECATP - County (in kind)	S6,2	GCP: Eastern Access	£5,839.50
14/0887/FUL	3/10/14	Garages 11 - 45 Ekin Road Cambridge Cambridgeshire	Abbey	CCC	Transport Contribution - ECATP - County (in kind)	S6,3	GCP: Eastern Access	£5,839.50
14/1691/S73	2/4/15	Land South Of Robinson Way West Of The Forvie Site Robinson Way Cambridge Cambridgeshire	Queen Ediths	CCC	Highways - Contribution	S1	GCP: CSET Phase 1 and Linton Greenway	£80,682.93
15/0893/FUL	30/11/15	Land West Of ARM 1 Peterhouse Technology Park Fulbourn Road Cambridge Cambridgeshire CB1 9PT	Cherry Hinton	CCC	Highways - Contribution	S5,6.2	GCP: Cross City Cycling - Fulbourn	£400,000.00
S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,1	GCP: Milton Road	£7,500.00

S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2	GCP: Milton Road	£7,500.00
S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,3	GCP: Milton Road	£90,000.00
S/1693/15/FL	8/12/15	184 Cambridge Science Park Milton Cambridgeshire	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,4	GCP: Milton Road	£90,000.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,1	GCP: Milton Road	£10,665.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2	GCP: Milton Road	£10,665.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,3	GCP: Milton Road	£127,980.00
S/1191/15/FL	10/12/15	Plots 26/27 Cambridge Science Park Milton	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,4	GCP: Milton Road	£127,980.00
S/1109/15/FL	18/12/15	Phase 2 Land (Zone 1) Granta Park Great Abington Cambridgeshire CB21 6AL	The Abingtons	SCDC	Transport - Contribution to County (in kind)	S2,1.1 a	GCP: Sawston Greenway	£50,000.00

S/1109/15/FL	18/12/15	Phase 2 Land (Zone 1) Granta Park Great Abington Cambridgeshire CB21 6AL	The Abingtons	SCDC	Transport - Contribution to County (in kind)	S2,1.1 b	GCP: CSET Phase 1 and Linton Greenway	£100,000.00
S/1109/15/FL	18/12/15	Phase 2 Land (Zone 1) Granta Park Great Abington Cambridgeshire CB21 6AL	The Abingtons	SCDC	Transport - Contribution to County (in kind)	S2,1.1 d	GCP: CSET Phase 1 and Linton Greenway	£20,000.00
15/0906/FUL	12/2/16	32 - 38 Station Road And Adjacent Land Cambridge Cambridgeshire CB1 2JH	Trumpington	CCC	Footpaths and Cycle Ways - Contribution	S6,P2,5	GCP: Chisholm Trail Phases 1 & 2	£500,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,1.1	GCP: Milton Road	£100,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,1.2	GCP: Milton Road	£100,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,2.1	GCP: Milton Road	£125,000.00

S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,2.2	GCP: Milton Road	£125,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,3.1	GCP: Milton Road	£152,000.00
S/0630/15/FL	26/2/16	250-289 Cambridge Science Park Cambridge CB4 0WE	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,P1,3.2	GCP: Milton Road	£152,000.00
15/2112/FUL	1/7/16	Land Adjacent Frankie And Bennys Restaurant Cambridge Retail Park Newmarket Road Cambridge Cambridgeshire	Abbey	CCC	Footpaths and Cycle Ways - Contribution	S4,1	GCP: Chisholm Trail Phases 1 & 2	£30,000.00
15/1522/FUL	26/10/16	Daedalus House Station Road Cambridge Cambridgeshire CB1 2RE	Trumpington	CCC	Transport - Contribution to County (in kind)	S6,P2,5	GCP: Chisholm Trail Phases 1 & 2	£370,159.00
S/1405/16/FL	3/11/16	29 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0DW	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,1	GCP: Milton Road	£82,653.00

S/1405/16/FL	3/11/16	29 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0DW	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,2	GCP: Milton Road	£82,653.00
S/0343/16/FL	3/11/16	St Johns Innovation Park Cowley Road Cambridge Cambridgeshire	East Chesterton	CCC	Transport - Contribution to County (in kind)	S4,2	GCP: Cross City Cycling - Green End Road	£187,849.00
S/0343/16/FL	3/11/16	St Johns Innovation Park Cowley Road Cambridge Cambridgeshire	East Chesterton	CCC	Transport - Contribution to County (in kind)	S4,3	GCP: Milton Road	£112,709.00
S/2682/13/OL	30/11/16	Land North Of Newmarket Road Cambridge CB5 8AA	Fen Ditton & Fulbourn	SCDC	Footpaths and Cycle Ways - Contribution	S12,2.1.1	GCP: Chisholm Trail Phases 1 & 2	£70,000.00
S/2682/13/OL	30/11/16	Land North Of Newmarket Road Cambridge CB5 8AA	Fen Ditton & Fulbourn	SCDC	Footpaths and Cycle Ways - Contribution	S12,2.1.2	GCP: Chisholm Trail Phases 1 & 2	£475,000.00
S/2682/13/OL	30/11/16	Land North Of Newmarket Road Cambridge CB5 8AA	Fen Ditton & Fulbourn	SCDC	Highways - Contribution	S12,3.1	GCP: Eastern Access	£2,270,000.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,1	GCP: Cross City Cycling - Green End Road	£49,219.00

S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2	GCP: Cross City Cycling - Green End Road	£49,219.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,3	GCP: Milton Road	£25,000.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,4	GCP: Milton Road	£25,000.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,5	GCP: Milton Road	£124,138.00
S/2599/16/FL	19/5/17	22 And 25 Cambridge Science Park Milton Cambridge Cambridgeshire CB4 0FW	Milton & Waterbeach	SCDC	Highways - Contribution	S1,P1,6	GCP: Milton Road	£124,138.00
S/1963/15/OL	17/8/17	Land To North And South Of And Immediate Linton Cambridgeshire	Linton	SCDC	Bus Services - Contribution	S3,P5,1	GCP: CSET Phase 1 and Linton Greenway	£35,000.00

S/2433/16/FL	13/9/17	Unit 216 Cambridge Science Park Cambridge	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2.1	GCP: Milton Road	£5,670.00
S/2433/16/FL	13/9/17	Unit 216 Cambridge Science Park Cambridge	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Contribution	S1,P1,2.2	GCP: Milton Road	£68,040.00
16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.4.1	GCP: Cambridge South West Travel Hub	£54,500.00
16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.4.2	GCP: Cambridge South West Travel Hub	£146,400.00
16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.5.1	GCP: Cambridge South West Travel Hub	£146,400.00

16/0176/OUT	25/9/17	Land South Of Dame Mary Archer Way Cambridge Biomedical Campus Cambridge Cambridgeshire	Queen Ediths	CCC	Bus Services - Contribution	S6,2.5.3	GCP: Cambridge South West Travel Hub	£54,500.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1a	GCP: Cambourne to Cambridge	£1,066,720.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1a	GCP: Cambourne to Cambridge	£533,280.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1b	GCP: Cambourne to Cambridge	£1,066,720.00
S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .1b	GCP: Cambourne to Cambridge	£533,280.00

S/2903/14/OL	29/12/17	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Cambourne	SCDC	Transport - Contribution to County (in kind)	S4,P1,C,2 .2	GCP: Cambourne to Cambridge	£5,500,000.00
S/2553/16/OL	1/2/18	Land Off Horseheath Road Linton Cambridge CB21 4AY	Linton	SCDC	Highways - Contribution	S3,P2,1	GCP: CSET Phase 1 and Linton Greenway	£20,000.00
S/2553/16/OL	1/2/18	Land Off Horseheath Road Linton Cambridge CB21 4AY	Linton	SCDC	Bus Services - Contribution	S3,P3,1	GCP: CSET Phase 1 and Linton Greenway	£10,000.00
17/2245/FUL	6/6/18	Mill Road Depot Mill Road Cambridge CB1 2AZ	Petersfield	CCC	Highways - Contribution	S9,1.2	GCP: Chisholm Trail Phases 1 & 2	£124,257.00
S/2372/17/FL	23/7/18	Land Adjacent To Cambridge North Station Milton Avenue Cambridge CB4 0WZ	Milton (Detached)	SCDC	Signage / Wayfinding - Contribution	S2,1.2b	GCP: Chisholm Trail Phases 1 & 2	£14,151.00
S/4478/17/FL	24/7/18	Land Adjacent To Cambridge North Station Land Adjacent To Cambridge North Station Cowley Road Cambridge	Milton (Detached)	SCDC	Signage / Wayfinding - Contribution	S2,1.2(b)	GCP: Chisholm Trail Phases 1 & 2	£15,849.00

S/4478/17/FL	24/7/18	Land Adjacent To Cambridge North Station Land Adjacent To Cambridge North Station Cowley Road Cambridge	Milton (Detached)	SCDC	Footpaths and Cycle Ways - Contribution	S2,1.2(c)	GCP: Chisholm Trail Phases 1 & 2	£59,698.00
S/2372/17/FL	24/7/18	Land Adjacent To Cambridge North Station Milton Avenue Cambridge CB4 0WZ	Milton (Detached)	SCDC	Footpaths and Cycle Ways - Provision	S2,4misc	GCP: Waterbeach Greenway	£40,236.85
17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,1	GCP: Comberton Greenway	£400,000.00
17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Bridges - Contribution	S2,2	GCP: Comberton Greenway	£30,000.00
17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Highways - Contribution	S2,3	GCP: Madingley Road	£45,000.00

17/1799/FUL	14/8/18	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Highways - Contribution	S2,4	GCP: Madingley Road	£60,000.00
17/1896/FUL	28/12/18	Land To The West Of JJ Thomson Avenue And To The North Of University Residences West Cambridge Site Madingley Road Cambridge	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,1.2	GCP: Madingley Road	£45,000.00
17/1896/FUL	28/12/18	Land To The West Of JJ Thomson Avenue And To The North Of University Residences West Cambridge Site Madingley Road Cambridge	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,1.3	GCP: Madingley Road	£2,000.00
S/2941/18/FL	6/3/19	Land North Of Melbourn Science Park Melbourn Cambridgeshire	Melbourn	SCDC	Footpaths and Cycle Ways - Contribution	S1,2.1-2.2	GCP: Melbourn Greenway	£56,500.00
S/2941/18/FL	6/3/19	Land North Of Melbourn Science Park Melbourn Cambridgeshire	Melbourn	SCDC	Footpaths and Cycle Ways - Contribution	S1,3.1-3.2	GCP: Melbourn Greenway	£25,000.00

19/0175/FUL	13/8/19	Mill Road Depot Mill Road Cambridge Cambridgeshire CB1 2AZ	Petersfield	CCC	Highways - Contribution	S8,1.2.1	GCP: Chisholm Trail Phases 1 & 2	£35,591.00
19/0175/FUL	13/8/19	Mill Road Depot Mill Road Cambridge Cambridgeshire CB1 2AZ	Petersfield	CCC	Highways - Contribution	S8,1.2.2	GCP: Chisholm Trail Phases 1 & 2	£35,591.00
19/0288/FUL	11/10/19	Development Land At 75 Cromwell Road Cambridge Cambridgeshire	Romsey	CCC	Highways - Contribution	S9,2-3	GCP: Chisholm Trail Phases 1 & 2	£71,182.00
18/0481/OUT	14/12/20	Land North Of Cherry Hinton Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Highways - Contribution	S9,4.1	GCP: Cycling Plus - A1134	£200,000.00
S/4329/18/OL	17/12/20	Wellcome Genome Campus Hinxton Saffron Walden Cambridgeshire CB10 1RQ	Duxford	SCDC	Highways - Contribution	S3,2.19-2.20	GCP: CSET Phase 2	£140,000.00
S/4329/18/OL	17/12/20	Wellcome Genome Campus Hinxton Saffron Walden Cambridgeshire CB10 1RQ	Duxford	SCDC	Transport - Contribution to County (in kind)	S3,4.6	GCP: Whittlesford Station	£750,000.00

S/4615/18/OL	22/4/21	Land To The West Of Cambridge Research Park Beach Drive Landbeach CB25 9TL	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S1,3.1-3.2	GCP: Waterbeach to Cambridge	£380,000.00
19/1168/OUT	20/5/21	Land At Newbury Farm Babraham Road Cambridge Cambridgeshire	Queen Ediths	CCC	Transport - Contribution to County (in kind)	S5,P3,1-2	GCP: CSET Phase 1 and Linton Greenway	£345,000.00
20/04826/FUL	10/9/21	Lockton House Clarendon Road Cambridge Cambridgeshire CB2 8FH	Trumpington	CCC	Transport - Contribution to County (in kind)	4.1	GCP: Chisholm Trail Phases 1 & 2	£135,869.00
20/03802/FUL	10/9/21	Development Parcel L2 Topper Street Orchard Park Cambridge Cambridgeshire	Histon & Impington	SCDC	Footpaths and Cycle Ways - Contribution	S4,1-2	GCP: Histon Road	£75,000.00
20/01972/OUT	7/1/22	Netherhall Farm Worts Causeway Cambridge CB1 8RJ	Queen Ediths	CCC	Transport - Contribution to County (in kind)	S2,5.1	GCP: CSET Phase 1 and Linton Greenway	£300,000.00
20/03429/FUL	9/2/22	104 - 112 Hills Road Cambridge Cambridgeshire	Trumpington	CCC	Highways - Contribution	S4,1(a)	GCP: Cycling Plus - Hills Road	£50,000.00
20/03429/FUL	9/2/22	104 - 112 Hills Road Cambridge Cambridgeshire	Trumpington	CCC	Highways - Contribution	S4,1(b)	GCP: Cycling Plus - Hills Road	£450,000.00

20/02142/OUT	25/3/22	Northstowe Phase 3B Station Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P1,1.1 b	GCP: St Ives Greenway	£356,000.00
20/02171/OUT	25/3/22	Northstowe Phase 3A Rampton Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P1,1.1 b(i)	GCP: St Ives Greenway	£712,000.00
20/02171/OUT	25/3/22	Northstowe Phase 3A Rampton Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P1,1.1 b(ii)	GCP: St Ives Greenway	£712,000.00
21/00264/FUL	25/3/22	Blocks B2 & F2, Devonshire Quarter Devonshire Road Cambridge Cambridgeshire	Petersfield	CCC	Footpaths and Cycle Ways - Contribution	S4,P2,1	GCP: Chisholm Trail Phases 1 & 2	£30,000.00
20/03523/FUL	23/6/22	Land In The North West Part Of The St Johns Innovation Park Cowley Road Milton Cambridge Cambridgeshire CB4 0ZT	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S4,1	GCP: Waterbeach Greenway	£225,999.24

20/03523/FUL	23/6/22	Land In The North West Part Of The St Johns Innovation Park Cowley Road Milton Cambridge Cambridgeshire CB4 0ZT	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S4,2	GCP: Waterbeach Greenway	£150,666.16
20/03598/OUT	7/7/22	Land West Of Station Road Longstanton Cambridge CB24 3DS	Longstanton	SCDC	Highways - Contribution	S3,P4,1b & 2b	GCP: St Ives Greenway	£57,000.00
20/03598/OUT	7/7/22	Land West Of Station Road Longstanton Cambridge CB24 3DS	Longstanton	SCDC	Highways - Contribution	S3,P4,3b & 4b	GCP: St Ives Greenway	£57,000.00
20/05040/FUL	11/8/22	Land To The West Of Peterhouse Technology Park Fulbourn Road Cambridge CB1 9NJ	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	3.1.5-3.1.6c	GCP: Fulbourn Greenway	£361,735.00
21/03822/FUL	2/9/22	Site 1 Granta Park Great Abington Cambridge Cambridgeshire CB21 6GP	Linton	SCDC	Transport - Contribution to County (in kind)	S1,2	GCP: CSET Phase 1 and Linton Greenway	£390,613.00

22/02330/FUL	18/10/22	Long Road Sixth Form College Long Road Cambridge CB2 8PX	Queen Ediths	CCC	Highways - Contribution	S4,1.1	GCP: Sawston Greenway	£16,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,P2,1b	GCP: Comberton Greenway	£370,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Highways - Contribution	S2,P2,1c	GCP: Comberton Greenway	£60,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,P2,1d	GCP: Cambourne to Cambridge	£250,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Footpaths and Cycle Ways - Contribution	S2,P2,1g	GCP: Comberton Greenway	£120,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (i)	GCP: Cambourne to Cambridge	£1,858,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (ii)	GCP: Cambourne to Cambridge	£1,858,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (iii)	GCP: Cambourne to Cambridge	£1,858,000.00

16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (iv)	GCP: Cambourne to Cambridge	£1,858,000.00
16/1134/OUT	2/3/23	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Newnham	CCC	Transport - Contribution to County (in kind)	S2,P2,1h (v)	GCP: Cambourne to Cambridge	£1,858,000.00
S/4243/19/FL	16/3/23	Land To The West Of Neal Drive Orchard Park Cambs	Histon & Impington	SCDC	Footpaths and Cycle Ways - Contribution	S4,1 & 2	GCP: Histon Road	£35,000.00
22/03826/FUL	19/4/23	Burlington Park Station Road Foxton Cambridgeshire	Foxton	SCDC	Transport - Contribution to County (in kind)	S3,P2,2.1	GCP: Melbourn Greenway	£70,000.00
22/03363/FUL	20/4/23	Dales Manor Business Park Grove Road Sawston Cambridgeshire CB22 3TJ	Sawston	SCDC	Transport - Contribution to County (in kind)	S2,1,1.2	GCP: CSET Phase 1 and Linton Greenway	£323,505.00
20/05253/FUL	15/5/23	Cambridge Innovation Park Denny End Road Waterbeach Cambridge Cambridgeshire CB25 9PB	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S3,PII,1.3	GCP: Waterbeach Greenway	£79,000.00

20/05253/FUL	15/5/23	Cambridge Innovation Park Denny End Road Waterbeach Cambridge Cambridgeshire CB25 9PB	Milton & Waterbeach	SCDC	Transport - Contribution to County (in kind)	S3,PII,1.4	GCP: Waterbeach Greenway	£54,000.00
22/01982/FUL	19/5/23	Devonshire Gardens Devonshire Road Cambridge Cambridgeshire CB1 2BJ	Petersfield	CCC	Footpaths and Cycle Ways - Contribution	S7,1	GCP: Chisholm Trail Phases 1 & 2	£95,164.44
S/3854/19/OL	22/6/23	Digital Park Station Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P3,1.1 b & 1.2b	GCP: St Ives Greenway	£43,000.00
S/3854/19/OL	22/6/23	Digital Park Station Road Longstanton Cambs	Longstanton	SCDC	Highways - Contribution	S3,P3,1.3 b & 1.4b	GCP: St Ives Greenway	£43,000.00
23/02467/FUL	18/1/24	Land At The Way Fowlmere Cambridgeshire	Foxton	SCDC	Transport - Contribution to County (in kind)	S3,2,1 & 2 x	GCP: Melbourn Greenway	£10,000.00
23/01457/FUL	19/1/24	10A Cheddars Lane Cambridge Cambridgeshire CB5 8LD	Abbey	CCC	Highways - Contribution	S4,2-3	GCP: Eastern Access	£102,400.00

23/01487/FUL	5/2/24	Vitrum Building St Johns Innovation Park Cowley Road Cambridge Cambridgeshire CB4 0WS	East Chesterton	CCC	Transport - Contribution to County (in kind)	S3,1 & 2a	GCP: Waterbeach Greenway	£722,685.00
23/01474/FUL	1/3/24	Blocks B2 & F2, Devonshire Quarter Devonshire Road Cambridge Cambridgeshire	Petersfield	CCC	Highways - Contribution	S4,P2,1	GCP: Chisholm Trail Phases 1 & 2	£30,000.00
23/01150/FUL	26/4/24	Land North Of 39A Station Road (west) Whittlesford Cambridgeshire CB22 4NL	Whittlesford	SCDC	Transport - Contribution to County (in kind)	S3,4,1 & 2	GCP: Whittlesford Station	£42,240.00
23/03654/FUL	2/7/24	Cambridge South West Way Sawston Cambridgeshire CB22 3FG	Sawston	SCDC	Highways - Contribution	S3,2.1 & 2	GCP: Sawston Greenway	£152,686.00
23/00835/FUL	5/7/24	Taylor Vinters Merlin Place 460 Milton Road Cambridge Cambridgeshire CB4 0DP	East Chesterton	CCC	Transport - Contribution to County (in kind)	S3,2,a,i	GCP: Waterbeach Greenway	£460,833.00

23/03080/OUT	23/7/24	Former Waste Water Treatment Facility Cambridge Road Hauxton Cambridgeshire CB22 5HT	Harston & Comberton	SCDC	Transport - Contribution to County (in kind)	S3,1&2	GCP: Melbourn Greenway	£682,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1a	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1b	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1c	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1d	GCP: Cambourne to Cambridge	£4,000,000.00
S/3440/18/OL	29/7/24	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Caldecote	SCDC	Transport - Contribution to County (in kind)	S7,1,1e	GCP: Cambourne to Cambridge	£4,000,000.00
23/04686/FUL	12/11/24	12 - 34 Fanshawe Road Cambridge Cambridgeshire CB1 3QY	Coleridge	CCC	Transport - Contribution to County (in kind)	S10,2	GCP: Chisholm Trail Phases 1 & 2	£152,000.00

23/04687/FUL	26/11/24	Barnwell Local Centre Barnwell Road Cambridge Cambridgeshire CB5 8RG	Abbey	CCC	Transport - Contribution to County (in kind)	S11,2	GCP: Cambridge Eastern Access	£278,000.00
23/04431/FUL	23/12/24	121-123 Chesterton Road Cambridge Cambridgeshire	West Chesterton	CCC	Transport - Contribution to County (in kind)	S4,1.1	GCP: Milton Road	£29,500.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.1	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.2	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.3	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.4	GCP: Melbourn Greenway	£50,250.00

23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.5	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.6	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.7	GCP: Melbourn Greenway	£50,250.00
23/01134/FUL	13/1/25	Land At Melbourn Science Park Cambridge Road Melbourn Cambridgeshire	Melbourn	SCDC	Transport - Contribution to County (in kind)	S2,1.2.8	GCP: Melbourn Greenway	£50,250.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.1	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00

23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.2	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.3	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P1, 1-1.4	GCP: Fulbourn Greenway (65%) / Eastern Access (25%)	£679,240.00
23/04590/OUT	31/1/25	Land South Of Coldhams Lane Cambridge Cambridgeshire	Cherry Hinton	CCC	Transport - Contribution to County (in kind)	S11, P4, 6-6.1	GCP: Fulbourn Greenway	£407,544.00
24/01370/FUL	20/2/25	29 Station Road Shepreth Cambridgeshire SG8 6GB	Melbourn	SCDC	Footpaths and Cycle Ways - Contribution	S2,1	GCP: Melbourn Greenway	£25,500.00
24/01354/FUL	6/3/25	137 And 143 Histon Road Cambridge Cambridgeshire CB4 3HZ	Arbury	CCC	Transport - Contribution to County (in kind)	S11,2	GCP: Histon Road	£57,000.00

24/01354/FUL	6/3/25	137 And 143 Histon Road Cambridge Cambridgeshire CB4 3HZ	Arbury	CCC	Transport - Contribution to County (in kind)	S11,4	GCP: Histon Road	£57,000.00
24/00889/FUL	11/3/25	Clarendon House Clarendon Road Cambridge Cambridgeshire CB2 8FH	Petersfield	CCC	Transport - Contribution to County (in kind)	S4,2	GCP: Cycling Plus - Hills Road	£119,490.00
24/01079/FUL	1/4/25	440 Cambridge Science Park Milton Cambridge South Cambridgeshire CB4 0QA	Milton & Waterbeach	SCDC	Footpaths and Cycle Ways - Provision	S3,3	GCP: Milton Road / Cambridge & Chisholm Trail Phases 1 & 2	£860,255.50
17/1799/FUL	23/6/25	Land West Of JJ Thomson Avenue West Cambridge Site Madingley Road Cambridge CB3 0FA	Newnham	CCC	Highways - Contribution	S2,1 dov	GCP: Comberton Greenway	£12,087.00
24/01473/FUL	3/7/25	Phase 2, South Cambridge Science Centre Dales Manor Business Park Grove Road Sawston Cambridgeshire CB22 3TJ	Sawston	SCDC	Transport - Contribution to County (in kind)	S2,8	GCP: CSET / Linton Greenway and/or Sawston Greenway	£156,000 (up to)

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Appendix B Representations received through consultation platform

Id	Respondent	Agent name	Topic	View	Representation
209339	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 1: Who are you responding on behalf of?	Comment	This response is submitted on behalf of Bar Hill Parish Council, representing the interests of residents of Bar Hill in South Cambridgeshire.
209515	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 1: Who are you responding on behalf of?	Comment	Response of behalf of Biomed Realty as a Developer/Landowner. Please see representations submitted via email. - 20260334 - Biomed CIL Reps
209528	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 1: Who are you responding on behalf of?	Comment	Response of behalf of Brockton Everlast as a Developer/Landowner. Please see representations submitted via email comprised of the following documents: - 27.03.26 - Cambridge CIL VA Technical Note - Brockton – Final - 20260327 - Brockton - CIL Representations - Appendix 1 - Retail and Industrial Comparables - Appendix 2 - Commercial Build Cost Evidence - CIL technical appendix - Brockton 1
209417	Cambridge Ahead (Emma Pritchard) [130653]		Question 1: Who are you responding on behalf of?	Comment	Other - Cambridge Ahead is a business, research and academic membership organisation that is a long-term voice for the Cambridge economy, dedicated to good growth that improves quality of life.
209548	Cambridge Biomedical Campus (Mr Ed Watson, Strategic		Question 1: Who are you responding on behalf of?	Comment	(CBCL), the non-profit partnership representing the major health, research, education and life sciences organisations located on the Cambridge Biomedical Campus: Abcam, AstraZeneca, the MRD Laboratory of Molecular Biology, University of Cambridge, and the 3 NHS Foundation Trusts of

	Planning and Place Advisor) [130389]				Cambridgeshire and Peterborough, Cambridge University Hospitals and Royal Papworth Hospital..
209552	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 1: Who are you responding on behalf of?	Support	Cambridge Biomedical Campus Ltd (CBCL), the non-profit partnership representing the major health, research, education and life sciences organisations located on the Cambridge Biomedical Campus: Abcam, AstraZeneca, the MRC Laboratory of Molecular Biology, University of Cambridge, and the 3 NHS Foundation Trusts of Cambridgeshire and Peterborough, Cambridge University Hospital and Royal Papworth Hospital.
209392	Cambridge Cycling Campaign (Ms Anna Williams, CEO) [925]		Question 1: Who are you responding on behalf of?	Comment	I'm responding on behalf of Camcycle, Cambridgeshire's local membership charity working for better cycling.
208716	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 1: Who are you responding on behalf of?	Support	I am a resident of Cambridge City, occasional leisure cyclist and keen walker with local rambling groups.
208823	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal Planning Officer) [1801]		Question 1: Who are you responding on behalf of?	Comment	Other - Civic Society
208786	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 1: Who are you responding on behalf of?	Support	Cambridgeshire ACRE

208488	Catherine Wood [130071]		Question 1: Who are you responding on behalf of?	Support	Resident, supportive of the CIL to improve local facilities for businesses and residents.
207317	Claire Carroll [131906]		Question 1: Who are you responding on behalf of?	Comment	I am a resident.
209493	Croudace Homes (Hem Johal) [132008]		Question 1: Who are you responding on behalf of?	Support	Croudace Homes is a medium sized housebuilder that operates out of three regions with the aim to expand further in the coming years. Our current patch includes the East, South East and parts of the South West, West Midlands and East Midlands. We aim to deliver 1,200 high quality, sustainable homes per year and currently have 19,400 plots under an option or promotion agreement, ranging from 50-unit sites to 2,500-unit sites. We have developed sites in Cambridgeshire, including in Linton and Orwell. We also are currently promoting three sites through the Greater Cambridgeshire Local Plan.
208796	Dr David Andrew [132010]		Question 1: Who are you responding on behalf of?	Comment	Resident
207265	Dr hedda Joyce [131900]		Question 1: Who are you responding on behalf of?	Comment	as member of the public
207209	Dr Simon Ravenscroft [131889]		Question 1: Who are you responding on behalf of?	Support	Resident
209435	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 1: Who are you responding on behalf of?	Comment	Fowlmere Parish Council

207380	Frances Marsh [131911]		Question 1: Who are you responding on behalf of?	Support	N/a
208675	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 1: Who are you responding on behalf of?	Comment	Parish council
209461	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 1: Who are you responding on behalf of?	Comment	Great Shelford Parish Council
209484	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 1: Who are you responding on behalf of?	Object	Henry Boot Developments Ltd
209398	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 1: Who are you responding on behalf of?	Comment	Homes England
209457	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 1: Who are you responding on behalf of?	Comment	Response of behalf of Jesus College as a Developer/Landowner. Please see representations submitted via email comprised of the following documents: - 20262703 - Jesus College - CIL Representation - 27.03.26 - Cambridge CIL VA Technical Note - Final - Jesus College - Appendix 1 - Retail and Industrial Comparables - Appendix 2 - Build Cost & Professional Fees Evidence

209333	Jonathan Jones [5905]		Question 1: Who are you responding on behalf of?	Support	Resident
209469	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 1: Who are you responding on behalf of?	Comment	We write on behalf of our client, Juniper Propco (Bourn) Limited ('Juniper'), the owners of Bourn Airfield.
209445	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 1: Who are you responding on behalf of?	Comment	Linton Parish Council
209309	Little Shelford Parish Council (Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Question 1: Who are you responding on behalf of?	Comment	Parish Council
209310	Little Shelford Parish Council (Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Question 1: Who are you responding on behalf of?	Support	Parish Council
209532	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 1: Who are you responding on behalf of?	Comment	Lolworth Developments Limited ('LDL'), a subsidiary of Salhia Real Estate.
209382	Maria Cleminson [131415]		Question 1: Who are you responding on behalf of?	Comment	Riverside Area Residents Association - neighbourhood group rar.org.uk

209330	marshall [131436]	Quod (Rebecca Sanders) [8708]	Question 1: Who are you responding on behalf of?	Comment	The Cambridge Airport site, owned by Marshall Group Properties, is currently safeguarded and not allocated for development in the local plans, with policies preventing its development until a review occurs. The site is recognised in the emerging Greater Cambridge Local Plan as a strategic area for at least 8,000 homes and mixed-use development, but pre-application discussions have not yet begun. Draft Policy S/CE requires a tailored transport mitigation plan for the site, which has not yet been developed or costed, indicating a need for site-specific funding mechanisms. Marshall argues that applying a generalised CIL to Cambridge East could complicate infrastructure delivery and requests that the site be nil rated for CIL due to its unique requirements. The importance of bespoke infrastructure provision for Cambridge East is highlighted, suggesting that planning obligations are more effective than a generalised CIL for securing necessary infrastructure. Marshall requests confirmation from authorities that the proposed Charging Schedule will not apply to the development of Cambridge East, seeking clarity on this position.
207268	Mr Alan Fersht [131901]		Question 1: Who are you responding on behalf of?	Support	Personal
207231	Mr Anthony Lock [131893]		Question 1: Who are you responding on behalf of?	Support	Resident

207103	Mr Bruce Marshall [3554]		Question 1: Who are you responding on behalf of?	Support	Resident
208843	Mr Bruno Poltronieri [132028]		Question 1: Who are you responding on behalf of?	Comment	Resident
207311	Mr Cristiano Belloni [131905]		Question 1: Who are you responding on behalf of?	Object	I am a Cambridge resident
207208	Mr Derek Blackburn [131886]		Question 1: Who are you responding on behalf of?	Comment	as a resident
207197	Mr Derek Blackburn [131886]		Question 1: Who are you responding on behalf of?	Support	Resident
205629	Mr Felix Sanchez Garcia [5806]		Question 1: Who are you responding on behalf of?	Support	Resident
209307	Mr Isaac Rawlings [132044]		Question 1: Who are you responding on behalf of?	Comment	Resident
207187	Mr James Nadin [131885]		Question 1: Who are you responding on behalf of?	Support	.
207251	Mr Jeremy Baumberg [9264]		Question 1: Who are you responding on behalf of?	Support	Resident of Cambridge
207104	mr Matthew Tennant [3315]		Question 1: Who are you responding on behalf of?	Support	Resident
207099	Mr Maurice Barnes [131881]		Question 1: Who are you responding on behalf of?	Comment	Resident

207085	Mr Michael Blackburn [130839]		Question 1: Who are you responding on behalf of?	Support	Cambridge resident.
207528	Mr Paul Hourigan [131948]		Question 1: Who are you responding on behalf of?	Object	We are a small and medium sized property developer that operates in and around the Greater Cambridge Region. We strongly object to the implementation of the CIL levy bill.
207527	Mr Paul Hourigan [131948]		Question 1: Who are you responding on behalf of?	Object	We are a small and medium sized property developer that operates in and around the Greater Cambridge Region. We strongly object to the introduction of the CIL levy.
207322	Mr Rob Ward [131907]		Question 1: Who are you responding on behalf of?	Comment	I am commenting as a resident of Cambridge
207262	Mr Tarek Saad [131899]		Question 1: Who are you responding on behalf of?	Support	Resident
209400	Mrs Louise Simmonds [132043]		Question 1: Who are you responding on behalf of?	Comment	Developer/landowner
207424	Ms Flynn Lebus [131931]		Question 1: Who are you responding on behalf of?	Comment	Resident in Cambridge
209375	NHS Cambridgeshire and Peterborough Integrated Care Board [131754]	NHS Property Services Ltd (Mr Mark Adams) [129763]	Question 1: Who are you responding on behalf of?	Comment	Cambridgeshire & Peterborough ICB
209531	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 1: Who are you responding on behalf of?	Comment	We are a Developer/Landowner

209520	Places for People [131604]	Ceres Property (Mr David Fletcher) [130250]	Question 1: Who are you responding on behalf of?	Comment	We are responding on behalf of Places for People. Places for People are promoting the land to the north and west of Wilbraham Road, Fulbourn as part of the emerging Local Plan as a sustainable site for a residential led development for over 2,500 dwellings.
209512	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 1: Who are you responding on behalf of?	Comment	Response of behalf of Railpen as a Developer/Landowner. Please see representations submitted via email comprised of the following documents: - 27.03.26 - Cambridge CIL VA Technical Note - Final – Railpen - 20262703 - Railpen- CIL Representations - Appendix 1 - Retail and Industrial Comparables
207228	Roland Curtis [131892]		Question 1: Who are you responding on behalf of?	Comment	Resident
207409	Rosy Greenlees [131913]		Question 1: Who are you responding on behalf of?	Support	I am responding as a resident
209298	Sarah Hughes [131437]		Question 1: Who are you responding on behalf of?	Comment	Resident
209506	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 1: Who are you responding on behalf of?	Comment	Stanhope as a Developer/landowner. Please see representations submitted via email comprised of the following documents: - 27.03.26 - Cambridge CIL VA Technical Note - Stanhope - 20260327 - Stanhope - CIL Representations - Appendix 1 - Retail and Industrial Comparables - CIL technical appendix - Stanhope

209366	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 1: Who are you responding on behalf of?	Comment	Swavesey Parish Council
209317	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 1: Who are you responding on behalf of?	Comment	Response on behalf of Bursars' Planning Sub-committee for Cambridge University Colleges. Note that individual Colleges may make their own responses.
207353	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 1: Who are you responding on behalf of?	Comment	Other
209426	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 1: Who are you responding on behalf of?	Comment	The University of Cambridge
207263	Mr Tarek Saad [131899]		Question 1: Who are you responding on behalf of?	Support	Resident
207217	Matt Whiting [9162]		Question 1: Who are you responding on behalf of?	Support	Resident
205630	Mr Felix Sanchez Garcia [5806]		Question 1: Who are you responding on behalf of?	Support	Resident
209470	Abbey Properties Cambridgeshire Limited (Mr Andy Brand,		Question 2: Do you wish to participate in the CIL examination?	Comment	I may or may not wish to participate in the CIL examination.

	Planning Director) [7930]				
209340	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes Bar Hill Parish Council would welcome the opportunity to participate in the examination process in order to represent the views of the local community regarding the potential implications of the Community Infrastructure Levy for infrastructure delivery and development within the area.
209408	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 2: Do you wish to participate in the CIL examination?	Comment	No
209517	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 2: Do you wish to participate in the CIL examination?	Comment	Biomed Realty wish to reserve a right to appear at CIL Examination. The absence of reference to other parts of the CIL evidence base within the submitted representations should not be taken as agreement to their content, and we reserve the right to make further comments on the evidence at examination stage.
209529	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 2: Do you wish to participate in the CIL examination?	Support	Brockton Everlast wish to reserve a right to appear at CIL Examination. The absence of reference to other parts of the CIL evidence base within the submitted representations should not be taken as agreement to their content, and we reserve the right to make further comments on the evidence at examination stage.
209418	Cambridge Ahead (Emma Pritchard) [130653]		Question 2: Do you wish to participate in the CIL examination?	Comment	No

209553	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes subject to the comments in the later in this submission.
209549	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes, if matters set out this response are not agreed or are challenged.
208718	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 2: Do you wish to participate in the CIL examination?	Support	Happy to be involved if called.
208824	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal Planning Officer) [1801]		Question 2: Do you wish to participate in the CIL examination?	Comment	No
208787	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 2: Do you wish to participate in the CIL examination?	Object	n/a

209509	Cambridgeshire County Council and Prologis [132051]	Quod (Mrs Georgina Thomson, Associate) [7297]	Question 2: Do you wish to participate in the CIL examination?	Comment	Yes, we would like to reserve the opportunity to appear at examination.
208489	Catherine Wood [130071]		Question 2: Do you wish to participate in the CIL examination?	Comment	Do not wish to participate.
209494	Croudace Homes (Hem Johal) [132008]		Question 2: Do you wish to participate in the CIL examination?	Object	No
207275	Dr hedda Joyce [131900]		Question 2: Do you wish to participate in the CIL examination?	Comment	this would depend on the time commitment. so most likely no, I don't want to participate.
207193	Dr Nazima Pathan [131887]		Question 2: Do you wish to participate in the CIL examination?	Support	I support
209436	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes
208676	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 2: Do you wish to participate in the CIL examination?	Comment	Do not wish to participate in CIL examination
209460	Great Shelford Parish Council (Mrs Nicola		Question 2: Do you wish to participate in	Comment	No we do not wish to participate in the CIL examination

	Webster, Clerk) [6190]		the CIL examination?		
209485	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 2: Do you wish to participate in the CIL examination?	Object	Yes. Henry Boot Developments Ltd is a development company proposing a unique development at IWM Duxford and we would like our interests expressed as part of the CIL Examination.
209458	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 2: Do you wish to participate in the CIL examination?	Support	Jesus College wish to reserve a right to appear at CIL Examination. The absence of reference to other parts of the CIL evidence base within the submitted representations should not be taken as agreement to their content, and we reserve the right to make further comments on the evidence at examination stage.
209483	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 2: Do you wish to participate in the CIL examination?	Comment	Yes
209446	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 2: Do you wish to participate in the CIL examination?	Support	Yes Linton Parish Council wish to participate
209299	Little Wilbraham and Six Mile Bottom Parish Council (Hayley Livermore) [131216]		Question 2: Do you wish to participate in the CIL examination?	Support	We wish to participate in the CIL examination
209533	Lolworth Developments	Lichfields (Mr Josh Hymer, Senior	Question 2: Do you wish to participate in	Comment	Yes

	Limited [129685]	Planner) [129682]	the CIL examination?		
208804	Maria Carvalho [132017]		Question 2: Do you wish to participate in the CIL examination?	Comment	No
209383	Maria Cleminson [131415]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes
207232	Mr Anthony Lock [131893]		Question 2: Do you wish to participate in the CIL examination?	Support	Yes
207312	Mr Cristiano Belloni [131905]		Question 2: Do you wish to participate in the CIL examination?	Support	Not sure what I should write here?
209308	Mr Isaac Rawlings [132044]		Question 2: Do you wish to participate in the CIL examination?	Support	Yes
207186	Mr James Nadin [131885]		Question 2: Do you wish to participate in the CIL examination?	Support	.
207188	Mr James Nadin [131885]		Question 2: Do you wish to participate in the CIL examination?	Support	.
207252	Mr Jeremy Baumberg [9264]		Question 2: Do you wish to participate in the CIL examination?	Support	support principle, don't need to be involved

205637	Mr Martin Shrosbree [131231]		Question 2: Do you wish to participate in the CIL examination?	Support	Fully Support
207105	mr Matthew Tennant [3315]		Question 2: Do you wish to participate in the CIL examination?	Support	I wish to participate in the CIL examination
207100	Mr Maurice Barnes [131881]		Question 2: Do you wish to participate in the CIL examination?	Comment	No
207370	Mr Michael Maries [120571]		Question 2: Do you wish to participate in the CIL examination?	Object	Any additional charges should be stopped.
208560	Mr Mike Evans [131774]		Question 2: Do you wish to participate in the CIL examination?	Support	No Opinion
207529	Mr Paul Hourigan [131948]		Question 2: Do you wish to participate in the CIL examination?	Comment	No
207323	Mr Rob Ward [131907]		Question 2: Do you wish to participate in the CIL examination?	Comment	I wish to comment on the proposal to introduce CIL
207154	Mr Tomasz Dyl [131884]		Question 2: Do you wish to participate in the CIL examination?	Support	Yes
209401	Mrs Louise Simmonds [132043]		Question 2: Do you wish to participate in	Comment	No.

			the CIL examination?		
207425	Ms Flynn Lebus [131931]		Question 2: Do you wish to participate in the CIL examination?	Support	x
207271	Ms Lesley Nicholls [131902]		Question 2: Do you wish to participate in the CIL examination?	Support	Support
209376	NHS Cambridgeshire and Peterborough Integrated Care Board [131754]	NHS Property Services Ltd (Mr Mark Adams) [129763]	Question 2: Do you wish to participate in the CIL examination?	Comment	If required
209537	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 2: Do you wish to participate in the CIL examination?	Support	Yes. Pioneer Group wish to reserve a right to appear at the CIL Examination. The absence of reference to other parts of the CIL evidence base within the submitted representations should not be taken as agreement to their content, and we reserve the right to make further comments on the evidence at examination stage.
209519	Places for People [131604]	Ceres Property (Mr David Fletcher) [130250]	Question 2: Do you wish to participate in the CIL examination?	Object	Yes we would like to participate in the CIL examination.
209514	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 2: Do you wish to participate in the CIL examination?	Support	Railpen wish to reserve a right to appear at CIL Examination. The absence of reference to other parts of the CIL evidence base within the submitted representations should not be taken as agreement to their content, and we reserve the right

					to make further comments on the evidence at examination stage.
207410	Rosy Greenlees [131913]		Question 2: Do you wish to participate in the CIL examination?	Support	No
209507	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 2: Do you wish to participate in the CIL examination?	Support	Stanhope wish to reserve a right to appear at CIL Examination. The absence of reference to other parts of the CIL evidence base within the submitted representations should not be taken as agreement to their content, and we reserve the right to make further comments on the evidence at examination stage.
209367	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes
209565	Trinity College, Cambridge (Emma Woods) [132073]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes. Trinity College wishes to participate in the CIL examination and requests the right to appear at the hearing sessions to present and develop the concerns set out in this representation.
209318	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 2: Do you wish to participate in the CIL examination?	Comment	Yes
207354	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 2: Do you wish to participate in the CIL examination?	Support	yes

209427	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 2: Do you wish to participate in the CIL examination?	Comment	No
209334	Jonathan Jones [5905]		Question 3: Do you agree that the Council should introduce CIL?	Support	I support CIL in principle because Cambridge's growth needs infrastructure, and the Greater Cambridge Partnership has now reached the final tranche of its City Deal funding, so ongoing delivery cannot rely on that source. Sustainable development in a larger, more distributed city depends on more than transport alone. It also requires timely investment in health, education, local services, civic amenities and social spaces. The councils should therefore justify CIL more broadly, and explain clearly how it will support the wider infrastructure needed to keep Cambridge liveable as it expands.
207247	Lord Lord Richard Balfe [131895]		Question 3: Do you agree that the Council should introduce CIL?	Support	It seems a good and worthwhile idea to me
209471	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		Question 3: Do you agree that the Council should introduce CIL?	Comment	This depends solely upon the Council's approach to my answer to Question 1.
205644	B Nicolson [5745]		Question 3: Do you agree that the Council should introduce CIL?	Support	It looks like a very practical solution to me.
209341	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes, in principle. Bar Hill Parish Council recognises that the Community Infrastructure Levy can provide an important mechanism for ensuring that new development contributes towards the

					infrastructure required to support growth. Given the scale of planned development across the Greater Cambridge area, the introduction of a levy to secure infrastructure funding is appropriate. However, the effectiveness of CIL will depend on how revenues are allocated, the transparency of decision-making processes, and whether communities experiencing development pressures receive meaningful infrastructure improvements.
209409	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The implication of introducing CIL is that the level of affordable housing would almost certainly need to be reduced.
207304	Bob Ward [130114]		Question 3: Do you agree that the Council should introduce CIL?	Object	The best way I can imagine of killing off the centre of the city for business.
209419	Cambridge Ahead (Emma Pritchard) [130653]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Cambridge Ahead recognises and supports the need to secure funding for strategic infrastructure to enable sustainable growth and close the infrastructure gap in Greater Cambridge. A clear and proportionate local funding approach would also show Government that Greater Cambridge is committed to supporting infrastructure delivery alongside national investment. Cambridge Ahead also recognises the rationale for introducing a mechanism such as CIL to support infrastructure delivery. However, there are significant concerns that the current evidence base does not yet fully reflect the realities of delivering development in Greater Cambridge, and greater clarity is needed around the assumptions underpinning the viability evidence. A mechanism like the Community Infrastructure Levy (CIL)

				has the potential to contribute to this by providing a clearer and more consistent framework for infrastructure funding, enabling increased predictability and certainty. However, the introduction of CIL must be considered in the context of current market conditions. The residential and commercial development sectors are currently working in a more difficult market environment, shaped by higher construction costs, less demand, increased financing costs and growing policy expectations relating to design, sustainability and biodiversity. In this difficult environment, cumulative cost burdens are already significant. While the Council's viability assessment indicates that the proposed CIL rates are deliverable, feedback from those actively delivering schemes in Greater Cambridge suggests the current market is more challenging than the assessment implies. There is a clear willingness within the development community to contribute to infrastructure provision. However, viability is currently more challenging than previously, and schemes are operating within tighter constraints. In this context, the Planning Authority should be extremely cautious about introducing additional fixed costs that could further increase cumulative pressures on development. For this reason, the introduction of CIL must be clearly justified and underpinned by robust, up-to-date evidence. The levy must demonstrably support rather than constrain delivery, including the economic growth that the infrastructure it funds is intended to enable. Ultimately, getting that balance right depends on a proportionate, evidence-based approach that reflects current market conditions and supports continued delivery.

209550	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 3: Do you agree that the Council should introduce CIL?	Support	Subject to subsequent comments about viability and exemptions for the existing campus CBCL supports the proposed Strategic Transport CIL.
209554	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes,
209551	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes.
209393	Cambridge Cycling Campaign (Ms Anna Williams, CEO) [925]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes, we support the introduction of a Community Infrastructure Levy. More investment is urgently needed in the sustainable transport network in Greater Cambridge for walking/wheeling, cycling and public transport to be a genuine option for everyone. In addition, building new transport infrastructure requires long-term thinking. Local authorities are best placed to plan and deliver new transport infrastructure when funding mechanisms are long-term and under their own control.

208719	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 3: Do you agree that the Council should introduce CIL?	Support	It is essential that new development contributes to the public good as it is putting additional pressure on existing facilities. Section 106 contributions are inadequate on their own.
208825	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal Planning Officer) [1801]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes, in principle. The CPPF supports the introduction of a CIL to ensure that small-scale developments, which currently escape significant contributions under Section 106, contribute to the area's infrastructure. However, our support is contingent on the levy being used as a holistic funding tool rather than a narrow mechanism for specific transport projects
208788	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 3: Do you agree that the Council should introduce CIL?	Support	Cambridgeshire ACRE supports the introduction of CIL as a mechanism to help fund the infrastructure needed to support planned growth. It is reasonable that development contributes towards the infrastructure required to make growth sustainable. However, it will be important that funding is not focused solely on large strategic infrastructure. In villages and rural communities, even modest development can increase demand on local infrastructure such as community buildings, village halls, green spaces and local walking and cycling links. These facilities play an important role in supporting community life and helping communities absorb growth well.
209324	Cambridgeshire Chambers of Commerce (Mr Connor Butler, Engagement Manager) [132045]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent emphasises the need for infrastructure funding to support sustainable growth in Greater Cambridge, highlighting the importance of a levy structure that reflects the current cost environment for businesses and developers. The development sector is under financial pressure due to build cost inflation, financing constraints, and regulatory requirements, which are impacting scheme viability.

					Upcoming business rate increases of 8 to 12 percent from April 2026 are expected to further tighten margins for commercial and mixed-use developments. The proposed Community Infrastructure Levy (CIL) introduces additional costs that could exacerbate existing financial pressures, with a typical unit incurring a charge of £3,255, representing an effective additional cost of around 1.9 percent. Even modest additional costs can significantly affect investment decisions, potentially leading to delays or reductions in development schemes, which would impact housing delivery and economic growth. The final CIL rates should be informed by up-to-date viability evidence to balance infrastructure funding needs with the maintenance of development conditions. A proportionate and evidence-based approach is necessary to ensure infrastructure funding supports sustainable communities while maintaining development viability and attractiveness to investors. The respondent encourages stakeholders in the construction and development sectors to review the draft proposals and provide detailed feedback to ensure the final framework supports both infrastructure and economic growth. The respondent expresses commitment to collaborating with partners to ensure policy decisions facilitate growth while reflecting the realities faced by businesses.
209508	Cambridgeshire County Council	Quod (Mrs Georgina Thomson,	Question 3: Do you agree that the	Comment	The Parties welcome in principle the introduction of CIL but seek clarity on its application to CBC and its expansion. In principle, the Parties support the concept that all development

	and Prologis [132051]	Associate) [7297]	Council should introduce CIL?		within and as an expansion of the Campus should contribute equitably to Campus enhancements and infrastructure. The consultation documents do not provide clarity on what the CIL proceeds will be spent on. There is concern that the proposed CIL may not adequately address the infrastructure requirements for CBC as it relates to the adopted Local Plans and not the transport mitigation package developed by the Landowner Collaboration Group. It would be inappropriate for development at the Campus to be asked to pay a generalised CIL charge if the proceeds were not ring fenced for expenditure required by the Campus. It is essential to differentiate between infrastructure projects funded through CIL and those funded by localised s106 agreements to avoid double payment by developers. The consultation lacks clarity on how CIL proceeds will be coordinated with wider government investment in Cambridge. The proposed instalment policy for CIL payments is deemed too low; a longer-term approach similar to that used in Oxford is recommended for large contributions.
207310	carl turner [130634]		Question 3: Do you agree that the Council should introduce CIL?	Object	This levy is simply another tax. It will suppress the creation of new housing stock and hinder the redevelopment of brownfield sites. Section 106 should reformed , ie developers must provide the promised services before the properties are signed off by building control. Not after.
207365	Catarina Campos [130646]		Question 3: Do you agree that the Council should introduce CIL?	Comment	I only support if with the right amounts datacentres should be charged a lot of money. They require too much water, electricity, and barely provide employment. Shops etc should be charged a lot less we barely have a community.

208490	Catherine Wood [130071]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes, current developments (Darwin Green, Eddington) do not have enough community infrastructure built alongside. A CIL would help address the shortfall partly.
207318	Claire Carroll [131906]		Question 3: Do you agree that the Council should introduce CIL?	Support	It makes sense to do, but this proposal goes about it the wrong way.
209495	Croudace Homes (Hem Johal) [132008]		Question 3: Do you agree that the Council should introduce CIL?	Support	Croudace understand CIL is necessary to meet the ambitious aims of the Council and can see there is a funding gap between the total transport project costs and the secured funding. Therefore, we would support a CIL being introduced, provided it benefits large, medium and small developments, and the overall ambitions of the County. It is also important that the charging schedule does not result in CIL being payable too early, which may cause developments to be unviable due to negative cashflow implications. There is a risk that this would apply a disproportionate burden to small and medium size developers.
209325	Dino Zuvela [132046]		Question 3: Do you agree that the Council should introduce CIL?	Object	Public transportation links and utilities have continually worsened, and there is little guarantee that additional levees and charges will directly lead to an improvement for the area's infrastructure. Potentially useful spaces are left unoccupied throughout Cambridge and surrounding areas, and additional levies will further disincentivise future development.
208797	Dr David Andrew [132010]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
207192	Dr Nazima Pathan [131887]		Question 3: Do you agree that the Council should introduce CIL?	Support	Cambridge infrastructure needs urgent overhaul and quite honestly I am surprised the council has not applied a levy that was an option to them for such a long time.

207194	Dr Nazima Pathan [131887]		Question 3: Do you agree that the Council should introduce CIL?	Support	Why on earth has this not already been done - the impact is clear in the state of Cambridgeshire as a place to live and travel. The massive expansion needs infrastructure support
207419	Dr Roger Sewell [5506]		Question 3: Do you agree that the Council should introduce CIL?	Support	Development puts additional strain on all the local infrastructure - of course the developers should pay for this.
207212	Dr Simon Ravenscroft [131889]		Question 3: Do you agree that the Council should introduce CIL?	Support	A lot of new development is proposed for Cambridge. This is a sensible way of funding the infrastructure that will be needed to support that.
209437	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes. We should add that whilst CIL appears to be a straightforward money-raising system in practice it is complex. The Community Infrastructure Levy Regulations 2010 which implement it are complex and cumbersome. Nor is its relationship with s.106 agreements simple. We also note that CIL for Greater Cambridge is only expected to meet £50 million of a £272.5 million funding gap. However we are also aware that between 15 and 25% of CIL receipts are passed to Parish Councils in a way which is simpler than under s.106 agreements. That is a significant reason for our support.
208677	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes CL should be introduce to fund infrastructure projects in the local area.
209462	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes CIL is more beneficial that stand alone S106

209486	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 3: Do you agree that the Council should introduce CIL?	Object	Whilst there is no in principle objection to CIL, in our representations we have raised concerns about the potential for double counting of contributions through the use of CIL and S106 in tandem. In addition, we have raised serious concerns with the proposed CIL charging schedule as drafted.
209399	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes
209335	Jonathan Jones [5905]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
209447	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes we agree the Council should introduce CIL
209311	Little Shelford Parish Council (Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Question 3: Do you agree that the Council should introduce CIL?	Support	yes CIL should be introduced
209300	Little Wilbraham and Six Mile Bottom Parish Council (Hayley Livermore) [131216]		Question 3: Do you agree that the Council should introduce CIL?	Support	We agree that the council should introduce CIL

209534	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 3: Do you agree that the Council should introduce CIL?	Object	Please see Letter submission.
207248	Lord Lord Richard Balfe [131895]		Question 3: Do you agree that the Council should introduce CIL?	Support	yes
208808	Maria Carvalho [132017]		Question 3: Do you agree that the Council should introduce CIL?	Support	I think it's important to charge the developers for transportation and road infrastructure costs that the rapid growth in population brought by new developments brings.
209384	Maria Cleminson [131415]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
207215	Matt Whiting [9162]		Question 3: Do you agree that the Council should introduce CIL?	Support	Absolutely this is needed (and should have happened a long time ago).
207216	Matt Whiting [9162]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
207223	Miss Caroline Blackmun [131891]		Question 3: Do you agree that the Council should introduce CIL?	Support	I agree
207222	Miss Caroline Blackmun [131891]		Question 3: Do you agree that the Council should introduce CIL?	Support	It is important the development funds infrastructure.

207261	Miss Noemi Jelinek [131898]		Question 3: Do you agree that the Council should introduce CIL?	Object	Seems like a money grab to me. Rather than looking for funding and saving within the council first thing that is plan is take more money from everyone else.
207233	Mr Anthony Lock [131893]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes
208844	Mr Bruno Poltronieri [132028]		Question 3: Do you agree that the Council should introduce CIL?	Support	Seems reasonable, as long as it's clear and transparent how it will be spent.
207313	Mr Cristiano Belloni [131905]		Question 3: Do you agree that the Council should introduce CIL?	Object	We don't need new houses and we don't need to pay for them
207198	Mr Derek Blackburn [131886]		Question 3: Do you agree that the Council should introduce CIL?	Support	Repeat - support
207211	Mr Derek Blackburn [131886]		Question 3: Do you agree that the Council should introduce CIL?	Support	Repeat: Support
207204	Mr Derek Blackburn [131886]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
207362	Mr Harry Clifford [131909]		Question 3: Do you agree that the Council should introduce CIL?	Support	Overall support a levy to be used for infrastructure. Large office buildings add huge stress to transport, and large residential add huge stress to things like water, electric, and local amenities. I do not agree with a levy on those local amenities though, including shops, restaurants, cafes. These are slowly disappearing from Cambridge and being replaced with office and lab space.

207253	Mr Jeremy Baumberg [9264]		Question 3: Do you agree that the Council should introduce CIL?	Support	Strongly support this, as helps fund crucial infrastructure and developers need to sacrifice short term gain in return for long term trust on developing full communities
207411	Mr Jon Garnsworthy [131914]		Question 3: Do you agree that the Council should introduce CIL?	Support	We need the infrastructure. The money has to come from somewhere and developers seems a reasonable place to get it from
207294	Mr jonathan williams [131904]		Question 3: Do you agree that the Council should introduce CIL?	Object	We do not need a further tax on new builds especially at this rate - we need to encourage growth, not hamper it.
207296	Mr jonathan williams [131904]		Question 3: Do you agree that the Council should introduce CIL?	Object	we do not need or want an additional tax like this - please fire most of of the staff instead and replace them with AI
207414	Mr Kevin Ramsden [131915]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes it should most council's have
207106	mr Matthew Tennant [3315]		Question 3: Do you agree that the Council should introduce CIL?	Support	I approve of the proposed Community Infrastructure Levy
207101	Mr Maurice Barnes [131881]		Question 3: Do you agree that the Council should introduce CIL?	Support	None
207350	Mr Michael Brown [131890]		Question 3: Do you agree that the Council should introduce CIL?	Object	I am not satisfied that any additional funding will be allocated wisely
207349	Mr Michael Brown [131890]		Question 3: Do you agree that the	Object	Object

			Council should introduce CIL?		
207363	Mr Michael Maries [120571]		Question 3: Do you agree that the Council should introduce CIL?	Object	Charging the levy will only pass on costs to the public of Cambridge. Also the Council Tax is going up by the maximum amount. When will the local Authorities stop using the public as cash cows due to their incompetence with the public finances.
207364	Mr Michael Maries [120571]		Question 3: Do you agree that the Council should introduce CIL?	Object	No absolutely not, more costs will drive businesses abd people to go elsewhere.
208561	Mr Mike Evans [131774]		Question 3: Do you agree that the Council should introduce CIL?	Support	I think that developers are more likely to comply with CIL than S106
207530	Mr Paul Hourigan [131948]		Question 3: Do you agree that the Council should introduce CIL?	Object	Small and medium-sized property developers (SMEs) play a crucial role in delivering housing throughout the Greater Cambridge Region. The environment for SME home builders has become steadily more challenging. The complexity and cost of the planning process being a burden for the past decade. In addition to this, issues with viability, infrastructure constraints and increasing demand-side challenges limit their capacity to plan and deliver new projects.It's no surprise that confidence among small developers is slipping and also deter new entrants from joining the sector altogether. The introduction of the CIL will decimate the already challenging SME platform.
207240	Mr Philip Cornett [131894]		Question 3: Do you agree that the Council should introduce CIL?	Comment	I support if data centres have higher rate than £35.
207246	Mr Philip Cornett [131894]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Only if Data centre rates are higher than £35. They use up loads of energy, increase electricity costs, and create noise pollution. No one wants an AI data centre near them.

207324	Mr Rob Ward [131907]		Question 3: Do you agree that the Council should introduce CIL?	Object	I object to the introduction of CIL as it will add a significant further overhead to businesses seeking to operate in Cambridge, to the detriment of the City's attractiveness to enterprise and the profitability of business activity here. This is an anti-business proposal which runs wholly contrary to the Government's growth agenda. It will help to stifle development and initiative to the City's long-term detriment. Residents will suffer as at least some of the resulting costs will inevitably be passed on to customers/consumers.
205622	Mr Roger Crabtree [130954]		Question 3: Do you agree that the Council should introduce CIL?	Support	Generates more funds for much needed infrastructure spending. Developers are at present adept at wriggling out of S106 'obligations'
205623	Mr Roger Crabtree [130954]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
207264	Mr Tarek Saad [131899]		Question 3: Do you agree that the Council should introduce CIL?	Support	Totally, the developments should pay for the infrastructure
207153	Mr Tomasz Dyl [131884]		Question 3: Do you agree that the Council should introduce CIL?	Object	Levy will increase costs and will be passed on costumers.
207155	Mr Tomasz Dyl [131884]		Question 3: Do you agree that the Council should introduce CIL?	Object	This is another financial burden for businesses. Council should support businesses, not implying more "taxing" on them.
207277	Mr Zbigniew Ulanowski [131897]		Question 3: Do you agree that the Council should introduce CIL?	Support	Ues

207290	Mrs Marilyn Ballisat [131903]		Question 3: Do you agree that the Council should introduce CIL?	Comment	I agree with the levies. It will make developers more aware of local needs and raise money for the council to use for the benefit of the residents in the area
207259	Ms Elizabeth Buie [131896]		Question 3: Do you agree that the Council should introduce CIL?	Object	I object to an emphasis on growth, full stop. First, we haven't got the water infrastructure. Second, the traffic will get worse. Third, all of the new construction is boring and ugly, uniform with no soul and no heart. If we don't promote growth, there will be no need for a levy. But if you're going to insist on promoting growth, you HAVE to take care of the water problem before you start doing anything at all about it. btw, I am a resident. The so-called "Question 1" in this form doesn't offer a way to answer it.
207260	Ms Elizabeth Buie [131896]		Question 3: Do you agree that the Council should introduce CIL?	Object	See my answer to question 2.
207426	Ms Flynn Lebus [131931]		Question 3: Do you agree that the Council should introduce CIL?	Support	I agree that additional committment to finance infrastructure required by additional populations is required A levy for a 'whole of place' development (rather than individual buildings) could also attractive if the levy is slightly lower for a holistic approach (making biodiversity, access/affordability, etc. more feasible) Might the levy be adjusted for re-furb and/or for Small biz It is not a 'silver bullet' solution, however, and should be considered alongside other forms of infrastructure revenue (e.g., what are the key infrastructure being considered? roads (given the terrible state of them in Cambridge), water/electricity cables, etc. and/or education and schools?

207269	Ms Lesley Nicholls [131902]		Question 3: Do you agree that the Council should introduce CIL?	Support	Agreed
207273	Ms Lesley Nicholls [131902]		Question 3: Do you agree that the Council should introduce CIL?	Support	Support
207203	Ms Tanya Baker [131888]		Question 3: Do you agree that the Council should introduce CIL?	Support	Developers are not keeping their promises to provide GP Surgeries, Pharmacies, Schools etc, so a CIL ring fenced to do this is a good idea
207206	Ms Tanya Baker [131888]		Question 3: Do you agree that the Council should introduce CIL?	Support	Money from CILs must be used for the development it was levied on
209377	NHS Cambridgeshire and Peterborough Integrated Care Board [131754]	NHS Property Services Ltd (Mr Mark Adams) [129763]	Question 3: Do you agree that the Council should introduce CIL?	Comment	Cambridgeshire & Peterborough ICB want to understand the impact of the introduction of this CIL charge on new development, particularly on the impact on the viability of new developments coming forward subject to the CIL charge, and how the delivery of other health infrastructure and developer contributions towards health will be impacted. If the CIL funding for transport infrastructure is secured through CIL, we would expect to see a clear commitment and support from the Council and Local Plan Policy to ensure that funding and mitigation to support new/improved health infrastructure to support growth is supported and prioritised.
209535	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 3: Do you agree that the Council should introduce CIL?	Object	No. We do not oppose the principle of a charging schedule, but the timing, evidence base and rates proposed in this Consultation risk harming deliverability, given current market conditions, the emerging policy context, and the complex, phased nature of strategic development projects such as the Grafton Centre.

					In addition, for the site-specific reasons set out in our representations, we are requesting the explicit exclusion of the Fitzroy/Burleigh Street/Grafton (FBG) Area of Major Change (AMC) from any CIL Charging Area, to have a £0 psm rate applied.
209521	Places for People [131604]	Ceres Property (Mr David Fletcher) [130250]	Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent supports the introduction of the Community Infrastructure Levy (CIL) for funding major transport and infrastructure projects in the Greater Cambridge area. CIL should primarily focus on strategic infrastructure delivery, while Section 106 agreements should continue to address localised community infrastructure needs such as schools and open spaces. It is crucial to ensure that the viability burden on developers is appropriate to prevent developments from becoming unviable. The respondent acknowledges the importance of infrastructure projects proposed by the Greater Cambridge Partnership and the Combined Authority for accelerating growth in the area.
207229	Roland Curtis [131892]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Funds raised by a CIL should not be used to fill the broken finances of the GCP. The GCP is a time limited organisation with projects often late and seriously over budget.
209573	S Page [130882]		Question 3: Do you agree that the Council should introduce CIL?	Support	Greater investment still required in sustainable transport. Infrastructure development requires long term input and funding.

207378	Solon Karapanagiotis [131910]		Question 3: Do you agree that the Council should introduce CIL?	Object	In theory, a more investment-friendly policy is not to introduce CIL
209368	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes
209564	Trinity College, Cambridge (Emma Woods) [132073]		Question 3: Do you agree that the Council should introduce CIL?	Comment	TCC strongly supports the principle of good growth in Greater Cambridge. Managed, well-planned growth is essential to sustaining Cambridge's global standing as a centre of scientific and technological excellence. For Cambridge this means the delivery of world-class research, development and innovation facilities alongside high-quality housing and supporting infrastructure. TCC submits these representations in a constructive spirit, and with the aim of ensuring that the CIL charging schedule is fit for purpose and does not inadvertently constrain the very development on which the area's future prosperity depends.
209566	Trinity College, Cambridge (Emma Woods) [132073]		Question 3: Do you agree that the Council should introduce CIL?	Comment	We would therefore recommend at this stage that: • Pause the progression of the current CIL Charging Schedule to allow alignment with the emerging Greater Cambridge Local Plan and the evolving governance and infrastructure funding framework for the area. • Undertake a comprehensive review of infrastructure funding mechanisms alongside the emerging Local Plan, ensuring that CIL, Section 106, and other funding sources are considered holistically and in a coordinated manner. • Commission and publish a supplementary viability appraisal specifically addressing R&D and laboratory development, using appropriate and up-to-date construction cost data and

				reflecting the full range of typologies within the sector. • Incorporate the cost implications of emerging sustainability policies, including net zero carbon requirements, within the viability evidence base. • Reassess the treatment of strategic sites, with a view to: - o applying nil CIL rates or, at the very least, reduced rates to ensure they do not compromise the viability of strategic sites; and - o relying more heavily on bespoke Section 106 mechanisms to secure infrastructure delivery, supported by a clear framework for how CIL and Section 106 will interact. • Review and reduce the proposed CIL rates to ensure they do not compromise the viability and delivery of R&D development. • Ensure that the final proposals strike an appropriate balance, in line with Regulation 14, between the need to fund infrastructure and the potential impact on development viability.
209428	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 3: Do you agree that the Council should introduce CIL?	Comment The University supports stronger mechanisms for ensuring development contributes to transport infrastructure, highlighting a funding gap and the need for a local funding approach to support sustainable growth. Concerns were raised about the current evidence base not reflecting the realities of development in Greater Cambridge, necessitating clearer assumptions in viability evidence and comprehensive inclusion of policy requirements from the Draft Greater Cambridge Local Plan.

					Viability assessments should be based on real-life test schemes that are fully policy compliant, incorporating urban design, landscape, drainage, ecology, and abnormal land costs, rather than generic cost assumptions. The University expressed willingness to contribute to infrastructure provision but cautioned against introducing additional fixed costs that could hinder development viability and reduce affordable housing provision. Concerns were raised about the timing of CIL adoption, suggesting it should align with the Draft Local Plan process to ensure the evidence base is robust and relevant.
209342	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes, although further clarification would be beneficial. The supporting statement identifies a significant gap between the estimated cost of infrastructure required to support development and the level of funding expected to be generated through CIL. While the Parish Council accepts that a funding gap has been demonstrated, the scale of the gap raises questions regarding how the remaining infrastructure costs will be addressed. The Parish Council would therefore welcome greater clarity regarding how infrastructure investment will be prioritised and how the remaining funding requirements will be met.
209410	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Barratt does consider that the published Infrastructure Statement demonstrates a funding gap.
209420	Cambridge Ahead (Emma		Question 4: Do you agree that the	Comment	Cambridge Ahead understands that there is a significant strategic transport infrastructure funding gap associated with

	Pritchard) [130653]		Council has demonstrated a funding gap?		the GCP programme and that substantial investment will be required to deliver the transport interventions needed to support growth in Greater Cambridge. However, while the existence of the gap is not in question, the explanation of how the current shortfall has been derived remains unclear, particularly in relation to earlier City Deal assumptions about anticipated developer contributions. Greater clarity on how the shortfall has been calculated, would help provide confidence in the proposed approach. It would also be useful to set out more clearly how CIL income is expected to interact with other funding sources, whether a gap is still likely to remain once CIL is introduced, and how decisions will be made and infrastructure sequencing decided if funding falls short of expectations. This is particularly important in understanding the scale of funding that the proposed CIL is expected to generate in relation to the overall infrastructure funding gap. From the information available, it appears that the CIL may only make a relatively limited contribution towards addressing the identified shortfall. If this is the case, it raises questions about the extent to which the proposed approach will materially address the funding challenge, particularly when considered alongside the existing approach. Clear and transparent reporting on how CIL funds are collected, allocated and spent, including any unspent balances, will be important to maintain confidence that the money is being used effectively and in a timely way.
209555	Cambridge Biomedical Campus (Mr Ed Watson, Strategic		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes

	Planning and Place Advisor) [130389]				
209394	Cambridge Cycling Campaign (Ms Anna Williams, CEO) [925]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	The respondent believes the Greater Cambridge Infrastructure Statement significantly underestimates the funding gap, stating it should account for more than the £275 million indicated. They argue that the Infrastructure Statement only includes costs for current projects by the Greater Cambridge Partnership and does not consider additional projects deemed necessary by Cambridgeshire County Council. The respondent highlights the omission of essential projects identified by the Cambridgeshire and Peterborough Combined Authority, such as those outlined in the Bus Strategy, which are crucial for achieving its local transport vision.
208720	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
208826	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal Planning Officer) [1801]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes. There is a clear and documented funding gap for essential infrastructure. However, we are concerned that the current proposal focuses almost exclusively on transport infrastructure to fund Greater Cambridge Partnership (GCP) projects. A true assessment of the 'gap' must equally prioritise health, education, and green infrastructure, which are currently side-lined in this proposal.
208789	Cambridgeshire ACRE (Mrs Hayley Neal, Chief		Question 4: Do you agree that the Council has	Support	Cambridgeshire ACRE agrees that the consultation documents demonstrate a clear gap between the infrastructure required to support planned growth and the funding currently available. It is therefore reasonable for the

	Executive) [131460]		demonstrated a funding gap?		Council to seek mechanisms that allow development to contribute towards meeting these infrastructure needs. However, it will be important that investment addresses infrastructure needs across the whole Greater Cambridge area, including rural communities where growth can also place pressure on local facilities, transport connections and community infrastructure.
207319	Claire Carroll [131906]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	There is a funding gap.
209498	Croudace Homes (Hem Johal) [132008]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes, the infrastructure statement identifies a significant funding gap between the transport related infrastructure costs, and the committed funding. The funding remains uncertain, as even with the projected CIL money, there is still a large gap, and with inflation and delayed large infrastructure across the region there is still uncertainty as to how the gap will be closed.
208798	Dr David Andrew [132010]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
207195	Dr Nazima Pathan [131887]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	I support this
207214	Dr Simon Ravenscroft [131889]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Agree

209438	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes. However, whilst the amount estimated to be raised by CIL is £50 million this does not appear to take into account the obligation to distribute 15-25% to parish councils. Nor is it clear how the remaining part of the funding gap, £222.5 million, is to be met.
208678	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes there is a clear funding gap
209463	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes[, although the Parish Council does not necessarily agree with all the projects listed in the Infrastructure statement, for example it is opposed to CSET2. It also wishes to note that the scaled-back Sawston Greenway proposals are very disappointing, particularly through the village and Stapleford.]
209487	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The supporting documentation identifies that there is a funding gap but clarity is sought about all the funding streams Greater Cambridge is receiving, including as part of the 'City Deal' and part of the 'Greater Cambridge Oxford to Cambridge corridor' in which the Government recently announced £800 million ¹ . Further, a funding gap should not act as wider brake on development, that would potentially become unviable.
209336	Jonathan Jones [5905]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	I agree that the councils have demonstrated a funding gap. However, the evidence base is framed almost entirely around transport. It does not adequately identify the wider infrastructure needs of a growing and intensifying city, including health, education, community facilities, civic amenities and social spaces, all of which are necessary for sustainable development.
209475	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 4: Do you agree that the Council has	Comment	See comments above

			demonstrated a funding gap?		
209448	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
209301	Little Wilbraham and Six Mile Bottom Parish Council (Hayley Livermore) [131216]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	We agree that the council has demonstrated a funding gap
209538	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	See letter submission.
208805	Maria Carvalho [132017]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes. And we can see it in the state of the roads and fragmented transportation network
209385	Maria Cleminson [131415]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
207234	Mr Anthony Lock [131893]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes

207314	Mr Cristiano Belloni [131905]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	I do not agree that this is necessarily a funding gap.
207254	Mr Jeremy Baumberg [9264]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes.The alternative congestion charge which did not get voted through means crucial bus and other services cannot be funded. The council clearly demonstrates this funding gap.
207297	Mr jonathan williams [131904]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	no - just another tax - even calling it a levy is disingenuous
207415	Mr Kevin Ramsden [131915]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	More funding for roads repair is required too - the roads are in a terrible state of disrepair
207107	mr Matthew Tennant [3315]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	I agree that the Council has demonstrated a funding gap.
207102	Mr Maurice Barnes [131881]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
207351	Mr Michael Brown [131890]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The funding gap would be better closed by not wasting money on absurd schemes such as the "Birthday Cake" roundabout on Milton Road

207371	Mr Michael Maries [120571]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	No
207366	Mr Michael Maries [120571]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes the funding gap they created due to their incompetence.
208562	Mr Mike Evans [131774]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes, there is insufficient money for a transport network that would encourage commuting from beyond the green belt. Some of the money should be used to give the green belt lands to charities that will protect it for eternity.
207325	Mr Rob Ward [131907]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	If there is a funding gap, the Council should focus on driving down infrastructure costs and cutting expenditure, rather than impose a levy on enterprise and business activity.
207156	Mr Tomasz Dyl [131884]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	If there is a funding gap, mismanagement of funds is to blame. We, Cambridge community, pay more and more council tax every year, but we get less and less for it. Something is very wrong. I am affraid that the more money CCC will get, the more of it will be wasted. Like £4.8 million spent by GCP on Congestion Charge consultations.
207500	Mrs Daphne Lott [9215]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Council has shown a funding gap but MUST manage its funds better. GCP is appallingly run.
209402	Mrs Louise Simmonds [132043]		Question 4: Do you agree that the Council has	Support	Redrow does consider that the published Infrastructure Statement demonstrates a funding gap.

			demonstrated a funding gap?		
207291	Mrs Marilyn Ballisat [131903]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes they have demonstrated a funding gap
207427	Ms Flynn Lebus [131931]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Water drought, pot holes in the road -> directed lived experience of pressure on infrastructure!
207274	Ms Lesley Nicholls [131902]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Support
207207	Ms Tanya Baker [131888]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	I don't have this information
209536	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	No. A funding gap has been asserted, but not robustly demonstrated for the purposes of setting the Draft Charging Schedule. Please see our letter of representation, sent via email.
209522	Places for People [131604]	Ceres Property (Mr David Fletcher) [130250]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	We have not undertaken a detailed review of the funding gap. However, from review of the consultation material it appears that a funding gap exists in respect to the major transport infrastructure projects being delivered by the Greater Cambridge Partnership and the Combined Authority.

209574	S Page [130882]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Sort of, but I believe the funding gap is significantly underestimated.
209369	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
209567	Trinity College, Cambridge (Emma Woods) [132073]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	TCC accept that provision of strategic infrastructure is vital to enable major housing and employment developments to take place in the Greater Cambridge area. They also accept that a range of mechanisms, including CIL, need to be considered to fund this infrastructure. However, given the weak link between the evidence base, funding requirements and the proposed charge, and with the new joint Local Plan on the horizon, this is considered to be the wrong time to implement a CIL charge. A more appropriate course and efficient use of resources would be to pause the current CIL plans. This would allow GCPS to consider all funding mechanisms for the infrastructure to support the new Local Plan in the light of the emerging new governance and funding regime including the expected creation of the Development Corporation. It would also allow a clear evidence base to be developed and a range of funding mechanisms which could include a CIL charge, to endure for the life of the Local Plan.
207355	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	They have money for unnecessary things, maybe that should be redirected

209429	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The consultation identifies a funding gap but lacks clarity on the calculation of the current shortfall, particularly regarding earlier City Deal assumptions about developer contributions. Greater transparency on the derivation of the funding gap and the operation of CIL alongside other funding sources is needed to enhance confidence in the proposed approach. Clarification is required on how CIL income will interact with alternative Government funding through the proposed Development Corporation and whether a residual gap is anticipated after CIL implementation. The process for determining infrastructure priorities and sequencing in the event of inadequate funding should be clearly outlined.
207413	Mr Kevin Ramsden [131915]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Residential CIL rate is too low
209472	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	As mentioned in the response to Question 1 consideration must be given to the relationship with S106 contributions. It is not clear that this has been adequately considered.
205646	B Nicolson [5745]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	I certainly support it but I do question the low rate for data centres. Given the huge amount of resources they use, I think a significantly higher charge should be levied.

209343	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Partially. Bar Hill Parish Council recognises that the proposed rates are informed by viability evidence and supporting analysis. However, given the scale of infrastructure requirements identified in the supporting statement, it is not entirely clear whether the proposed rates will generate sufficient revenue to meaningfully contribute towards addressing the identified funding gap. The Parish Council therefore encourages the councils to provide additional justification explaining how the proposed rates have been determined and how they are expected to contribute towards infrastructure delivery.
209411	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Concerns regarding the Benchmark Land Values (BLV) suggest testing a range of £100,000-£150,000 per gross acre for strategic sites, as the current assumption of circa £100,000 may not align with landowner expectations. The capital values for affordable housing tenures are unclear, particularly the blended capital value for affordable rent of £293psf, which appears high compared to private values. Professional fees should be increased to a minimum of 10% for strategic sites due to significant infrastructure costs, rather than the applied 7%. Clarification is needed on whether the 1.4% allowance for Biodiversity Net Gain (BNG) costs is based on base build cost or includes externals, as current assumptions significantly underestimate the financial burden of achieving a 20% net gain. The viability assessment should clarify whether the 6 sales per month refers to all tenures, with a suggestion to limit

					private sales to no more than 3 per month per outlet. The omission of a return for a master developer in the viability assessment is significant; an additional 15% on cost is recommended for strategic sites, along with increasing the profit margin for private residential to a minimum of 20% on GDV. The cashflowing of appraisals for strategic sites needs to be more detailed, ensuring that investment in primary infrastructure is accurately represented to avoid overly optimistic viability results.
209518	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The viability evidence prepared by BNPP is deemed inaccurate, lacking robustness and market realism to support the proposed CIL rates, raising concerns about its credibility. The assumptions regarding costs, values, and developer margins do not reflect real market conditions, leading to unrealistic conclusions about the feasibility of CIL payments. The introduction of CIL at the proposed levels may undermine policy objectives, negatively impacting sustainability, design quality, and affordable housing provision. There are concerns that the necessary developer engagement as per national guidance has not occurred, questioning the evidence's compliance and soundness. The Infrastructure Statement lacks a clear justification for the identified transport projects and relies on outdated evidence from previous plans and strategies. The current Infrastructure Delivery Strategy indicates that CIL will generate only £50 million, which is insufficient to address the identified funding gap of £222.371 million.

					The Draft Charging Schedule cannot be justified based on an infrastructure strategy that is inadequately evidenced and not demonstrably deliverable.
207305	Bob Ward [130114]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Not the way to solve the problem
209530	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The review of the viability evidence indicates that BNPP has been overly optimistic in their cost and value assumptions, leading to a disconnect between development costs and realisable values in Greater Cambridge. Concerns are raised about the accuracy of the viability assessment, suggesting that the proposed CIL rates may not be sustainable and could undermine development viability and public benefits such as affordable housing. The assumptions regarding costs, values, and developer margins do not reflect the realities of the Greater Cambridge market, risking the deliverability of essential projects. The introduction of CIL alongside existing policy requirements may impose significant pressure on viability, potentially leading to project funding withdrawal and undeliverable schemes. The Infrastructure Statement lacks a clear justification for the identified transport projects and relies on outdated evidence from previous plans, failing to reflect current needs and conditions. The projected CIL revenue of £50 million is insufficient to

					address the identified funding gap of £222.371 million, raising concerns about the deliverability of the proposed infrastructure projects.
209421	Cambridge Ahead (Emma Pritchard) [130653]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Cambridge Ahead has significant concerns about the viability assessment presented in the evidence base for the CIL proposal and whether it adequately reflects current delivery conditions on the ground. Many of our members who are active in this sector have suggested that real-world build costs are higher than those assumed in the evidence base, and that yield assumptions may also differ from current market expectations, raising concerns that the modelling does not reflect current market reality. If this is the case, it risks overstating what development schemes can realistically support. We would encourage the Authority to give careful consideration to the evidence that organisations submit as part of this consultation process, to ensure that the CIL rates strike the right balance between contributing to the cost of strategic transport infrastructure and maintaining a viable pipeline of development. In addition, feedback from members who are actively bringing schemes forward in Greater Cambridge highlights the importance of ensuring that the modelling properly reflects the local development context. In Greater Cambridge, high design quality and ambitious environmental standards are already expected from developers, which is welcome and appropriate for an economy so critical for broader UK growth ambitions. While these expectations are supported in principle, they can add materially to construction costs. If these factors are not fully reflected in the viability evidence, there is a risk that the introduction of CIL could inadvertently discourage the delivery of high-quality development or reduce ambition around environmental standards, and we would be concerned if this resulted in an unintended reduction in the quality or sustainability of development coming forward.

					The commercial and innovation real estate market has faced a particularly challenging period since 2023, with less demand, higher financing costs and increased investor return requirements. These factors are shaping development decisions and should be carefully reflected in the viability assessment. The pace at which new schemes are coming forward in the current market also suggests that viability is already tight in practice. There is also concern that laboratory and innovation space appears to have been grouped with general office uses within the viability assessment, and that the evidence base does not adequately reflect the costs and market conditions associated with delivering complex R&D space such as laboratories. Laboratories, for example, are significantly more expensive to deliver than standard office space, with higher build costs, servicing requirements and different rental expectations. Given the importance of the innovation sector to Greater Cambridge, more explicit consideration of these uses would provide greater confidence that the assessment reflects local delivery realities. We would therefore welcome a review of the assumptions used within the viability assessment to ensure they reflect current build costs and commercial conditions in Greater Cambridge. Aligning the evidence more closely with recent delivery experience will help to ensure that the proposed rates are realistic and sustainable. The grouping of research and development space with general office uses in the draft charging schedule also raises concern that higher rates on these uses could discourage investment in commercial space for sectors that underpin the Greater Cambridge knowledge-intensive economy.
209557	Cambridge Biomedical		Question 5: Do you agree that the	Comment	The robustness and currency of the viability evidence used to reach the balance is questioned.

	Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Council has used appropriate evidence to inform the proposed rates?		Concerns are raised about the proposed CIL charge of £175 psqm for lab space, as it is considered too high due to the unique and costly requirements of lab development compared to general office space. An exemption for health-related development is recommended, particularly regarding the potential application of CIL to new Acute Hospital developments. A general exemption from CIL for the existing Cambridge Biomedical Campus is suggested, as developments will support funding for a new acute hospital and may require alternative funding mechanisms. It is proposed that key worker affordable housing developments on the existing campus should be exempt from CIL charges if a general exemption is not granted.
209556	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	We are not convinced that the evidence is comprehensive and robust. And while we support the principle of the CIL, we remain unconvinced as to whether the CIL charge is set at the right level to not choke off development which otherwise would come forward.
208721	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The evidence produced is very biased towards 'utility' transport schemes. Important as these are, it is a fact that residents of South Cambs take part in more leisure walks than utility walks and even in Cambridge leisure walking is popular. What about the 33% of households with dogs? They need green spaces for circular walks away from traffic. There is no reference too the Cambridgeshire Rights of Way Improvement Plan which should also be guiding where funds

					are spent. Please include Jenny's path from Great Shelford to the A10 and an off-road route by Lime Kiln Hill
208827	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal Planning Officer) [1801]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	No. While we acknowledge the intent to capture revenue from commercial developments that currently pay nothing, the evidence used to set the residential rate appears flawed: • Insufficient Residential Levy: The proposed £60/sqm for housing is significantly too low. It generates approximately £4.2k per dwelling, which pales in comparison to the £35k average currently secured via Section 106. • Infrastructure Shortfall: This rate fails to meet the actual costs of major infrastructure. For example, the Grange Farm A11 bridge requires roughly £10k per dwelling, a figure the proposed CIL cannot meet.
208790	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Cambridgeshire ACRE recognises that the Council has used viability assessments and infrastructure planning evidence to inform the proposed CIL rates and to balance infrastructure funding with development viability. However, we would encourage the Council to ensure that future monitoring of the levy includes consideration of impacts in rural areas. Smaller developments in villages can still create additional pressure on local infrastructure, including community buildings, transport connections and shared spaces. Understanding these local impacts will help ensure that CIL supports sustainable growth across both urban and rural communities.
207320	Claire Carroll [131906]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The Council has not provided adequate justification for the high CIL on residential properties. Personal housing is a need, not a business decision, and residential properties should be on the lowest CIL (£35). Industrial and data centres are resources and infrastructure hungry, and therefore should not be given the lowest rate.

					They need to support the infrastructure they demand and should have the highest rate shared with businesses (£175).
209499	Croudace Homes (Hem Johal) [132008]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The viability report relies on optimistic data, including an assumed 7% interest rate, which may not accurately reflect future trends, as rates could increase rather than decrease. Smaller developers may face borrowing challenges at the assumed interest rate, leading to potential viability issues that larger developers may not encounter. The viability report treats CIL as a flat cost, neglecting the additional borrowing costs that developers will incur prior to sales. Concerns are raised regarding the assumed return on affordable housing, particularly the 6% GDV for 75% social rent, which may not be realistic in all Greater Cambridge locations. The assumption of six sales per month in the viability report is deemed unreliable given current market conditions in the South East.
207278	Dr hedda Joyce [131900]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	yes
207196	Dr Nazima Pathan [131887]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	I think the rates are fair and proportionate

209439	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	We have no view on this and reserve our position.
208679	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes robust evidence has been outlined in the reports.
209464	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	evidence
209488	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The evidence supporting the proposed CIL charging rates is the "Greater Cambridge: Community Infrastructure Levy Viability Assessment" prepared by BNP Paribas (January 2026). For the detailed reasons set out within these representations and appended information provided by Newsteer, it is considered that the Council has not appropriately evidenced the proposed CIL rates.
209459	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The review by the viability experts indicates that the viability evidence prepared by BNPP is overly optimistic, with costs set unrealistically low and values at the upper end of the range, leading to an overstatement of the viability of development in Greater Cambridge. There are significant concerns regarding the assumptions used in the draft CIL rates, which do not reflect real market conditions, particularly in terms of costs, values, and developer margins. The viability evidence fails to provide a credible assessment of the impact of proposed CIL rates, risking the economic viability of

					developments and undermining policy objectives such as sustainability and affordable housing provision. Introducing CIL at the proposed levels could lead to undeliverable schemes and increased pressure on viability, particularly in a high-cost market like Greater Cambridge, echoing experiences from other locations such as London. The Infrastructure Statement lacks a clear justification for the identified transport projects and is based on outdated evidence that does not reflect current transport needs or costs. The projected CIL revenue of £50 million is insufficient to address the identified funding gap of £222.371 million, raising concerns about the deliverability of the proposed infrastructure projects.
209337	Jonathan Jones [5905]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	The councils have produced a viability assessment to support the proposed rates. However, this is a high-level area-wide exercise, and the evidence for the precise calibration of the rates — particularly the very high office/R&D rate and the decision not to differentiate geographically — appears more judgment-based than fully granular.
209477	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	See comments above
209449	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes
209302	Little Wilbraham and		Question 5: Do you agree that the	Support	We agree that the Council has used appropriate evidence to inform the proposed rates

	Six Mile Bottom Parish Council (Hayley Livermore) [131216]		Council has used appropriate evidence to inform the proposed rates?		
209544	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	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.
207249	Lord Lord Richard Balfe [131895]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	It seems to have done
209386	Maria Cleminson [131415]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Yes
207239	Mr Anthony Lock [131893]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Yes
207298	Mr jonathan williams [131904]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	n/a
207416	Mr Kevin Ramsden [131915]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	CIL rate on residential is too low
207108	mr Matthew Tennant [3315]		Question 5: Do you agree that the Council has used	Support	I agree that the Council has used appropriate evidence to inform the proposed rates.

			appropriate evidence to inform the proposed rates?		
207367	Mr Michael Maries [120571]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	No
207373	Mr Michael Maries [120571]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	No they only tell us only what we need to know and not the whole story
208563	Mr Mike Evans [131774]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes
207326	Mr Rob Ward [131907]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	I am not in a position to comment on this question. I object to the introduction of CIL in principle.
207157	Mr Tomasz Dyl [131884]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The idea is very wrong. There is no need for present evidence. It looks like just a money scam.

209403	Mrs Louise Simmonds [132043]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Concerns regarding development typologies in the viability report, specifically the classification of densities which do not align with typical definitions. A full review of typologies is recommended. The affordable housing values in the report are considered high compared to market unit sales values, suggesting a need for reassessment of the blended figure used for Affordable Rented units. The report lacks clarity on which quartile of BCIS build costs is used, and the allowance for external works is deemed too low, not reflecting true development costs. Professional fees are underestimated; a figure of 10% is suggested to better reflect current market conditions. Assumptions regarding developer finance costs should reflect a 10% rate due to ongoing geopolitical uncertainties and potential interest rate rises. Clarification is needed on whether the 1.4% allowance for Biodiversity Net Gain costs includes external works. The costs for achieving a 20% net gain are significantly underestimated. The viability report overestimates sales rates, which do not align with current market conditions, indicating a need for adjustment. Developer profit should be a minimum of 20% of GDV to reflect risks, especially in the Affordable Housing sector, with a blended figure of 25% suggested for overheads.

207292	Mrs Marilyn Ballisat [131903]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes the council has provided the required evidence
207428	Ms Flynn Lebus [131931]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	I have a concern about levys impacting small businesses. I did not see analysis to indicate if there was a differentiation of business size that was considered as part of the levy (which may not be relevant) - in short we do not want to undermine small business start-ups so any liability must not be passed onto them otherwise small shops/cafes which are needed to create local community may be impacted
207276	Ms Lesley Nicholls [131902]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Support
207210	Ms Tanya Baker [131888]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Northstowe development is a case in point
209539	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	No. The BNPP viability analysis is not robust or market-realistic: key assumptions on costs, values, margins and infrastructure do not reflect the conditions in Greater Cambridge, and there is uncertainty over the developer engagement undertaken (required by guidance). The strategic infrastructure evidence relies on out-of-date transport programmes, while expected CIL yield (circa £50m) would not contribute significantly towards the stated £272.5m funding gap.

209516	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The viability review indicates that BNPP's CIL viability assessment is overly optimistic, with inflated values and underestimated costs, leading to a disconnect between development costs and realisable values in Greater Cambridge. The respondent urges a reassessment of viability inputs and CIL charging rates to avoid negatively impacting development viability and public benefits like affordable housing. Concerns were raised about the lack of robust evidence supporting the draft CIL charges, questioning the accuracy of assumptions regarding costs, values, and developer margins. The respondent highlights that the proposed CIL levels may undermine sustainability, design quality, and affordable housing provision, risking project deliverability. The Infrastructure Statement lacks a clear justification for identified transport projects and relies on outdated evidence from previous plans, failing to reflect current transport needs. The projected CIL revenue of £50 million is insufficient to address the identified funding gap of £222.371 million, raising concerns about the feasibility of the proposed infrastructure strategy.
207230	Roland Curtis [131892]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The levy on hotels should be higher. They have much higher infrastructure requirements compared to other areas, given the high turnover of people who visit them.
209575	S Page [130882]		Question 5: Do you agree that the Council has used	Object	see answer to qu 6.

			appropriate evidence to inform the proposed rates?		
207379	Solon Karapanagiotis [131910]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	were can I find this information?
209505	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The review by the viability experts indicates that the CIL viability assessment by BNPP is overly optimistic, with costs underestimated and values set too high, leading to an inflated perception of development viability in Greater Cambridge. There are significant concerns regarding the assumptions used in the BNPP evidence, which do not accurately reflect market conditions, potentially undermining the viability of development and public benefits such as affordable housing. The proposed CIL rates may impose undue pressure on development viability, risking the withdrawal of essential project funding and the potential for schemes to become undeliverable, contrary to government growth ambitions. The Infrastructure Statement lacks a clear justification for the identified projects and fails to demonstrate the necessary link between the proposed CIL and the development strategy, with evidence being outdated and insufficient. The projected CIL revenue of £50 million is inadequate to address the identified funding gap of £222.371 million, raising concerns about the deliverability of the proposed infrastructure projects.
209370	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes

209568	Trinity College, Cambridge (Emma Woods) [132073]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The viability evidence base is incomplete regarding R&D and laboratory development, which are crucial to Greater Cambridge's economy. Construction costs for R&D buildings are significantly higher than standard commercial offices, with a premium of at least 40-50% due to specialised requirements. The Viability Report inadequately models R&D development economics, failing to distinguish between office and laboratory uses, leading to potential underestimation of costs. The report does not include a discrete analysis for laboratory or containment-grade R&D facilities, which is a significant omission given their economic importance. The proposed CIL rates risk undermining the viability of R&D developments, which are essential for the region's growth strategy. The Viability Report fails to account for the costs associated with achieving net zero carbon and water efficiency standards, particularly for energy-intensive R&D buildings.
209319	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent highlights the mandatory charitable exemption from CIL under regulations 41 and 43 of the 2010 CIR Regulations, noting its importance for Colleges applying for PBSA. The respondent questions whether BNP/GCSPS has considered this exemption in their assumptions for PBSA undertaken by Colleges. The respondent advocates for the application of discretionary relief provisions under section 44 of the CIR for charities' commercial developments, emphasising the impact of the

					Collegiate University's educational activities. The respondent expresses concern that real world build costs are significantly higher than those assumed in the study, suggesting a risk of overestimating the developments' support for CIL. The respondent recommends that real world evidence from construction professionals be closely considered to ensure accurate assessments.
209320	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent recommends the adoption of an Exceptional Circumstances Relief (ECR) policy to prevent educational and charitable developments from becoming undeliverable due to the absence of relief options. The respondent emphasises that implementing the ECR policy at the introduction of the Charging Schedule is crucial for maintaining viability and preventing negative impacts on development. The inclusion of the ECR policy is seen as a necessary safeguard that should be established from the outset to ensure timely and viable charitable educational developments, including student accommodation, in accordance with the Cambridge Local Plan.
207356	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Money is available to build things people object to, why not use it to provide what is needed instead
209430	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 5: Do you agree that the Council has used appropriate	Comment	The respondent expresses concerns that the viability assessment does not accurately reflect current market conditions, with higher actual construction costs and misaligned yield assumptions potentially overstating

			evidence to inform the proposed rates?	development support. Feedback indicates that the modelling fails to consider local context and requirements in Greater Cambridge, where high design quality and environmental standards increase construction costs. The respondent warns that if policy requirements are not reflected in viability evidence, the introduction of CIL may hinder high-quality development and environmental ambition. Concerns are raised about the grouping of laboratory and innovation space with general office uses in the viability assessment, as laboratories have significantly higher costs and different market conditions. The respondent highlights that aligning evidence with recent delivery experiences is crucial for ensuring proposed rates are realistic and sustainable. There are concerns that higher CIL rates on research and development space could deter investment in sectors vital to the Greater Cambridge economy. The respondent supports the allocation of 'F1' uses within the 'All other uses' category at a £0 CIL rate, noting that educational developments are not profit-generating and can mitigate impacts individually. Further discussion is requested regarding the charity exemption for the University when developing for charitable purposes, and confirmation is sought on charitable relief for Colleges and Universities for student accommodation.

207270	Mr Zbigniew Ulanowski [131897]		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?	Comment	The levy rates are too low - they do not reflect the true cost of infrastructure improvements required as a result of new developments. Examples include data centres (energy and water), residential (schools, shops, transport, regeneration of green spaces).
207412	Mr Kevin Ramsden [131915]		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?	Comment	The CIL rates are too low for residential - most areas have higher residential CIL rates. Cambridge has very high house prices and it should have a commensurately high residential CIL rate
207098	Mr Maurice Barnes [131881]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Comment	Data centres should have a CIL which considers the high water use in an area which has a low water availability and thus the infrastructure required to provide cooling for such projects.

			on the viability of developments?		
209473	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		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?	Comment	This depends largely upon the Council's position on S106 and the relationship with CIL.
209344	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		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?	Comment	Uncertain. Bar Hill Parish Council acknowledges the requirement within the CIL Regulations for local authorities to balance infrastructure funding with development viability. However, it is not entirely clear whether the proposed rates will generate sufficient revenue to address infrastructure pressures while maintaining development viability. The Parish Council would therefore welcome further explanation of how this balance has been assessed and how the impacts of the charging schedule will be monitored over time.
209412	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support	Comment	No comment

			development and the potential effect on the viability of developments?		
207306	Bob Ward [130114]		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?	Object	No - killing the goose that lays the golden egg
209422	Cambridge Ahead (Emma Pritchard) [130653]		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?	Comment	Achieving the right balance between securing infrastructure funding and maintaining development viability is clearly challenging. Cambridge Ahead supports the principle of funding the infrastructure needed to enable growth, but the Planning Authority should be extremely cautious about adding further cumulative pressures on development to the extent that schemes become unviable and do not come forward. Development in Greater Cambridge is already subject to a wide range of policy requirements, including affordable housing and workspace provision, sustainability standards, biodiversity obligations and Section 106 contributions. While each of these requirements is supported in principle, their combined impact is significant, particularly in the current market where viability is already under pressure. The introduction of CIL alongside continued Section 106 requirements will add to these cumulative pressures, and it

				will be important to ensure that the combined impact does not undermine scheme viability or prevent development from coming forward. Section 106 should continue to focus on addressing the direct impacts of individual developments, while CIL is intended to contribute towards wider strategic infrastructure. Greater clarity is needed on how the two mechanisms will operate alongside one another in practice, to ensure that there is no overlap or unintended cumulative pressure. We recognise that the proposed levy is largely intended to support transport infrastructure, which is critical to unlocking sustainable and inclusive growth that Cambridge Ahead has long called for. However, further consideration is needed to ensure that the cost of funding that infrastructure does not inadvertently make it harder for development to come forward. Given current market conditions, it will be important to keep the impact of the levy under review once introduced, to ensure it continues to support delivery as intended. It will also be important that the approach recognises the different characteristics of development sites across Greater Cambridge. Larger, strategic or more complex schemes can involve significant on-site infrastructure provision and longer delivery timescales, and the operation of CIL will need to take account of these realities to ensure that development remains deliverable.
209558	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support	Comment • Yes. This is a well-trodden path. And in the context of the campus, securing additional funds towards essential long planned but unfunded transport schemes such CSET outside of the campus and therefore unable to be addressed via S106, is essential to realise the campus's potential.

			development and the potential effect on the viability of developments?		• However in the same way that the level of a S106 package needs to be seen in the context of the viability of a scheme. The level of the CIL on any scheme, particularly on the existing campus needs to be
209563	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		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?	Comment	The robustness and currency of the evidence of viability used to reach the balance in the consultation is unclear. Concerns are raised regarding the proposed CIL charge of £175 psqm for lab space, as it is considered too high due to the higher development costs associated with lab facilities compared to general office space. An exemption for health-related developments is recommended, as it is unclear if the proposed CIL would apply to new health facilities, particularly the new Acute Hospital. A general exemption from CIL for the existing campus is suggested, as developments will support funding for the new acute hospital and may require additional funding mechanisms like TIFF. Key worker affordable housing developments on the existing campus should be exempt from the CIL charge if a general exemption is not granted.
209395	Cambridge Cycling Campaign (Ms Anna Williams, CEO) [925]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	Significant additional investment in transport infrastructure and services is necessary for sustainable travel to be a viable alternative to car travel in Greater Cambridge. The proposed Community Infrastructure Levy (CIL) charging schedule is insufficient, and councils should aim for a more ambitious CIL rate from developers. The proposed residential CIL rate of £60 per square metre is low compared to neighbouring authorities and previously

			on the viability of developments?		proposed rates for Cambridge City. Comparative CIL rates include Huntingdonshire District Council at £152, East Cambridgeshire District Council ranging from £70 to £159, and Cambridge City at £125 in 2014.
208791	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		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?	Support	Cambridgeshire ACRE considers that the proposed rates appear to strike a reasonable balance between securing contributions towards infrastructure and maintaining development viability. It will be important that this balance also works in practice for communities. Development should not only be viable for developers but also sustainable for the places where it occurs. This includes ensuring that local infrastructure keeps pace with growth, particularly in villages where even small developments can increase demand for community buildings, local services and transport connections.
207372	Catarina Campos [130646]		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?	Comment	Until you get rid of the "greenbelt", no. Let the city expand
208492	Catherine Wood [130071]		Question 6: Do you agree that the Council has struck an appropriate balance between	Support	Yes, much more needs to be done to make new neighbourhoods sustainable, good places to live. Currently there are NO medical facilities in Eddington or Darwin Green developments, and no pharmacy services either. The north/west of Cambridge is extremely poorly serviced for

			additional investment to support development and the potential effect on the viability of developments?		medical facilities, doctors, and pharmacies. There are also no swimming facilities which were promised from the university. This is a huge disappointment and massively lets down residents who have had to accept massive developments with no quality sport, schools, or medical infrastructure. This is a scandal and must be rectified.
209500	Croudace Homes (Hem Johal) [132008]		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?	Comment	No. The viability does not provide evidence which clearly demonstrates the CIL rates can be absorbed without affecting delivery. Key assumptions in the viability testing, including early loading of CIL, S106 and policy costs, optimistic finance rates and sales rates overstate viability headroom.
208799	Dr David Andrew [132010]		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?	Comment	On the face of it, no. Even with the projected income from the CIL there is still a significant funding gap, and congestion in Cambridge is already critical. Further development is simply not sustainable without significant extra investment to tackle this problem, and it is far from clear that even bridging the funding gap to allow completion of the current pipeline of schemes would be sufficiently transformational. This would indicate that a higher levy is required.
207199	Dr Nazima Pathan [131887]		Question 6: Do you agree that the Council has struck an appropriate	Support	It is essential that residents no longer bear the burden of developments and their negative impact on the environment we live in. Cambridge is a growth environment and

			balance between additional investment to support development and the potential effect on the viability of developments?		developers should have more input to the cost impact of their profitable builds
209440	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		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?	Comment	We have no view on this and reserve our position.
208681	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		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?	Support	Yes
209489	Henry Boot Developments	Twenty5 Planning Ltd (Ms Lydia	Question 6: Do you agree that the Council has struck	Object	No, for the detailed reasons set out within these representations, the Council has not appropriately evidenced the proposed CIL rates.

	Limited [131707]	Voyias) [131260]	an appropriate balance between additional investment to support development and the potential effect on the viability of developments?		
209479	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	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?	Object	See comments above
209450	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		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?	Support	Yes
209312	Little Shelford Parish Council		Question 6: Do you agree that the	Support	yes

	(Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments?		
209303	Little Wilbraham and Six Mile Bottom Parish Council (Hayley Livermore) [131216]		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?	Support	We agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments
209545	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	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?	Object	No. Please see our response to Question 5.

209387	Maria Cleminson [131415]		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?	Support	Yes
207224	Miss Caroline Blackmun [131891]		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?	Support	Looks reasonable to me.
207241	Mr Anthony Lock [131893]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Comment	the CIL levels chosen need to be increased to cover the funding gap.

			on the viability of developments?		
207315	Mr Cristiano Belloni [131905]		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?	Object	Lately it's all about development; we need to preserve character in Cambridge. We don't need ugly brutalist houses.
207185	Mr James Nadin [131885]		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?	Support	.
207255	Mr Jeremy Baumberg [9264]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Support	Yes. developers always complain they cannot get high enough rates of return, but it is important to bring them to longer term thinking for the entire ecosystem of infrastructure.

			the potential effect on the viability of developments?		
207300	Mr jonathan williams [131904]		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?	Object	n/a
207417	Mr Kevin Ramsden [131915]		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?	Object	Residential CIL rate is too low
207111	mr Matthew Tennant [3315]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support	Support	I agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments

			development and the potential effect on the viability of developments?		
207109	mr Matthew Tennant [3315]		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?	Support	I agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments.
207369	Mr Michael Maries [120571]		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?	Object	Absolutely not.its their incompetence why they are in this mess.
207374	Mr Michael Maries [120571]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Object	No this is not a consultation only stick box exercise and they'll do what ever they want, not what tge public want

			support development and the potential effect on the viability of developments?		
208564	Mr Mike Evans [131774]		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?	Support	Yes
207327	Mr Rob Ward [131907]		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?	Object	See my previous comments.
207431	Mr Robert MacDonald [9405]		Question 6: Do you agree that the Council has struck an appropriate balance between additional	Object	The Community Infrastructure Levy (CIL) Viability Assessment indicates that viable CIL rates for residential properties could range from £161 to £843 per square metre, significantly higher than the proposed £60 per square metre in the draft charging schedule.

			investment to support development and the potential effect on the viability of developments?		With an assumption of 50,000 residential units built over 20 years, the proposed £60 rate would generate £300 million for transport infrastructure, but the assessment suggests that rates ten times higher could be viable. The potential loss of over £2 billion in revenue due to the lower proposed rate could have disastrous effects on sustainable transport initiatives in the city.
205624	Mr Roger Crabtree [130954]		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?	Support	yes
207158	Mr Tomasz Dyl [131884]		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?	Object	What balance?? Only council benefits. Everyone else is losing.
209404	Mrs Louise Simmonds [132043]		Question 6: Do you agree that the Council has struck	Object	It is clear from the modelling calculations of maximum CIL rates that new settlements are unable to afford the proposed CIL charge, even with 0% affordable housing, unless sales

			an appropriate balance between additional investment to support development and the potential effect on the viability of developments?		values are £6,500 per square metre. However, evidence of sales values obtained from Landstack clearly demonstrate that new settlements are simply not able to achieve such high values. Cambourne are only achieving £4,166 per sqm and Northstowe only £3,800. At this sales value, no affordable housing would be possible which demonstrates that CIL is simply not viable for these sites.
207293	Mrs Marilyn Ballisat [131903]		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?	Support	Yes I think the balance is appropriate
207429	Ms Flynn Lebus [131931]		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?	Comment	I am not placed to comment on developer economics

207279	Ms Lesley Nicholls [131902]		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?	Support	Support
207213	Ms Tanya Baker [131888]		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?	Comment	This is not my field of expertise
209540	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	No. In combination with substantial Section 106 obligations and emerging policy requirements (e.g. BREEAM, affordable workspace, 20% BNG, minimum tree canopy), the proposed CIL charge would erode headroom, risking reductions in design quality, sustainability performance and affordable housing provision, and threatening delivery – particularly for brownfield, high-cost, phased schemes like the Grafton Centre.

			on the viability of developments?		
209523	Places for People [131604]	Ceres Property (Mr David Fletcher) [130250]	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?	Object	No objection is raised to the proposed CIL rate of £60 per square metre for residential developments, informed by the Greater Cambridge Community Infrastructure Viability Assessment. The consultation lacks a defined site threshold for distinguishing between strategic site allocations and other developments, despite the welcomed distinction in Section 106 contributions. Strategic sites incur significant non-Section 106 infrastructure costs, such as highway improvements and utilities, which should be included in the viability model. The same CIL rate for both strategic and non-strategic sites is questioned; non-strategic sites should pay a higher rate to ensure the viability and timely delivery of strategic sites. Concerns are raised regarding the CIL rate of £175 per square metre for offices and R&D, suggesting a zonal system with varying rates based on location due to differing property values.
209576	S Page [130882]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	Related to underestimating amount of investment required in infrastructure. Rates should be closer to those of neighbouring authorities.

			on the viability of developments?		
209371	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		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?	Support	Yes
209569	Trinity College, Cambridge (Emma Woods) [132073]		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?	Object	The balance has not been demonstrated for R&D and strategic site development. For the reasons set out under Question 5, Trinity College does not consider that the Councils have demonstrated, on the basis of the current evidence, that the proposed rates strike the balance required by Regulation 14 of the CIL Regulations for R&D and laboratory development.
209321	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Comment	Funding to unlock strategic transport initiatives which have been stalled for too long is clearly important in allowing the region to realise its potential. Striking the right balance between securing infrastructure funding and maintaining development viability is challenging. The system should be kept under regular review to ensure that development viability is not being undermined.

			the potential effect on the viability of developments?		
207357	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		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?	Object	See above responses. The population is growing yet people can't get a doctor's appointment or get to a pharmacy when they need to. This is way more important
209431	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	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?	Comment	The respondent supports funding for infrastructure but warns against introducing additional fixed costs that could make development unviable. Current policy obligations create cumulative pressures on development, which may hinder financial feasibility in a constrained market. Greater clarity is needed on the operation of Section 106 agreements and CIL to avoid duplication and double charging; strategic sites should be excluded from CIL. The proposed levy for transport infrastructure is acknowledged, but its cost must not hinder necessary development for growth. The approach should consider the varying characteristics of sites, particularly larger or complex developments that require substantial on-site infrastructure.

					CIL can provide more certainty in development appraisals compared to Section 106, but its introduction may create uncertainty for ongoing proposals. There is a concern that the introduction of CIL could lead to a turbulent period for development in an already challenging market.
209474	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	It is not clear and clarification through the examination would be essential. It would be appropriate to adopt a SPD alongside the CIL schedule (if adopted).
209468	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The relationship between CIL and Section 106 contributions needs to be clearly defined, as CIL should not serve as an additional levy to S106 contributions. Clarity is required through a Supplementary Planning Document (SPD) regarding the roles of CIL in funding strategic infrastructure and S106 in mitigating development impacts. There may be overlaps in contributions, particularly concerning highways and education, which necessitates clear guidance to avoid complexity in assessing new developments. The potential for viability challenges exists if contributions from CIL and S106 are not clearly established, highlighting the need for clarification during any CIL examination.
209345	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 7: Do you agree that it is clear how CIL will operate alongside Section	Comment	Not entirely. While the consultation explains that CIL will fund strategic infrastructure and Section 106 obligations will continue to

			106 Planning Obligations?		secure site-specific mitigation and affordable housing contributions, the relationship between the two mechanisms remains complex. Bar Hill Parish Council is concerned that reliance on CIL may limit the ability of planning authorities to secure development-specific infrastructure improvements through Section 106 agreements. Greater clarity regarding the interaction between these mechanisms would therefore be beneficial.
209413	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	No Comment
207307	Bob Ward [130114]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Irrelevant
207308	Bob Ward [130114]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Irrelevant
209423	Cambridge Ahead (Emma Pritchard) [130653]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Greater clarity would be helpful on how CIL is intended to operate alongside Section 106 in practice. Section 106 should continue to address the direct impacts of individual developments, while CIL is intended to contribute towards wider strategic infrastructure. Clear guidance on how the two mechanisms will work together would provide confidence that there will be no overlap or unintended cumulative impact. Developers need certainty that infrastructure will not

				effectively be charged for twice through different routes. It will also be important to ensure that the combined impact of CIL and Section 106 requirements is fully understood, and that this does not create additional viability pressures that could affect the delivery of development. Given that planning obligations often involve more than one local authority, consistency in how CIL and Section 106 are applied will also be important. Clear coordination across authorities will help to avoid unnecessary complexity in bringing schemes forward. It will also be important to ensure that the interaction between the two mechanisms does not unintentionally affect the timing of applications or introduce uncertainty in the process. It would also be helpful to understand how CIL will operate in practice across different types of sites. Schemes vary in complexity and in the infrastructure they provide on site, and it will be important that the levy works in a way that is fair and proportionate. It will be important that the instalment policy reflects the realities of phased and more complex developments, which might involve longer build-out periods and multiple stages of delivery. Clarity around commencement will also be important, particularly where pre-commencement conditions or ongoing Section 106 discussions affect when development can actually begin on site. The point at which the levy becomes payable should align with these practical stages of delivery. As with any new charging regime, clear communication about

					implementation and transition will help provide certainty for those progressing schemes.
209559	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	• Yes. This is a well-trodden path. And in the context of the campus, securing additional funds towards essential long planned but unfunded transport schemes such CSET outside of the campus and therefore unable to be addressed via S106, is essential to realise the campus's potential. • However in the same way that the level of a S106 package needs to be seen in the context of the viability of a scheme. The level of the CIL on any scheme, particularly on the existing campus needs to be
209572	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	• Yes. This is a well-trodden path. And in the context of the campus, securing additional funds towards essential long planned but unfunded transport schemes such CSET outside of the campus and therefore unable to be addressed via S106, is essential to realise the campus's potential.
209396	Cambridge Cycling Campaign (Ms Anna Williams, CEO) [925]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No. S106 funds are currently used to support various bus services in Greater Cambridge. It is not currently clear whether the local transport infrastructure required for new developments (e.g. new bus shelters, cycle parking) will be supported by CIL or S106 contributions going forward. In addition, for bus travel, the frequency and operating hours of bus services are as, if not more important than bus infrastructure (e.g. a busway). It is not clear whether bus services from new developments would be funded by CIL or S106. Clarity on these points is required.
208828	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal)		Question 7: Do you agree that it is clear how CIL will operate alongside Section	Object	No. The current proposal creates a "bun fight" where transport infrastructure is positioned to receive its funding slice first. This creates an inequitable system where: • Transport is prioritised at the expense of other essential

	Planning Officer) [1801]		106 Planning Obligations?		services. • Health, education, and green infrastructure remain reliant on Section 106, which will continue to fail to capture contributions from smaller sites. We argue that for a 'balance' to be struck, all infrastructure types must be funded equitably to address existing service shortfalls.
208792	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Partly / broadly yes Cambridgeshire ACRE recognises that the consultation documents explain the broad distinction between CIL and Section 106 obligations. However, further clarity would be helpful for communities and parish councils about how the two mechanisms will work in practice and what types of infrastructure will be funded through each route. Clear guidance would help local communities understand how development in their area will translate into infrastructure improvements. This is particularly important in rural areas where smaller developments can still create pressure on local facilities and community infrastructure.
209510	Cambridgeshire County Council and Prologis [132051]	Quod (Mrs Georgina Thomson, Associate) [7297]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No, there is insufficient clarity. They recommend a clear distinction between infrastructure projects funded by CIL and those funded by localised s106 agreements to ensure comprehensive funding for Campus infrastructure improvements.
209501	Croudace Homes (Hem Johal) [132008]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes, it is clear the CIL will fund strategic transport infrastructure, while S106 obligations will capture other items. Operational clarity is still lacking as the Planning Obligation SPD has not been adopted yet, which will provide more detail on the separation in cases of overlap.
207281	Dr hedda Joyce [131900]		Question 7: Do you agree that it is clear how CIL will operate	Support	it is clear

			alongside Section 106 Planning Obligations?		
207200	Dr Nazima Pathan [131887]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	I agree
209441	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	No. Whilst the Viability Report does refer to the continued use of s.106 agreements there is no clear statement setting out the approach for the future if CIL is approved. Such a statement is needed so that developers, Parish Councils and the general public understand what potential remains in the s.106 system.
208683	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes. However further detail is needed about how this will operate in the rural areas of Greater Cambridge, securing infrastructure for villages (pages 6&7 of the Greater Cambridge Infrastructure Statement)
209490	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No, clarity needs to be provided about the purpose for the CIL funding beyond just strategic projects to ensure there is no double counting of infrastructure costs with S106 and CIL operating in tandem.
209480	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	See comments above
209451	Linton Parish Council (Mrs		Question 7: Do you agree that it is clear	Support	Yes

	Jenny Seaward, Parish Clerk) [104763]		how CIL will operate alongside Section 106 Planning Obligations?		
209313	Little Shelford Parish Council (Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	yes
209304	Little Wilbraham and Six Mile Bottom Parish Council (Hayley Livermore) [131216]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	We agree that it is clear how CIL will operate alongside Section 106 Planning Obligations
209546	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	See Letter submission.
208806	Maria Carvalho [132017]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes
209388	Maria Cleminson [131415]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Yes

207242	Mr Anthony Lock [131893]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Yes - Both with run in tandem as they have different focuses.
207256	Mr Jeremy Baumberg [9264]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes. It is clear that this is a modest CIL, given that Section 106 is still the main resource.
207110	mr Matthew Tennant [3315]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	I Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations.
207112	mr Matthew Tennant [3315]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	I agree that it is clear how CIL will operate alongside Section 106 Planning Obligations
207375	Mr Michael Maries [120571]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	I understand
208565	Mr Mike Evans [131774]		Question 7: Do you agree that it is clear how CIL will operate alongside Section	Support	Yes

			106 Planning Obligations?		
207328	Mr Rob Ward [131907]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Please see my previous comments.
205625	Mr Roger Crabtree [130954]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	No comments
205626	Mr Roger Crabtree [130954]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	no comments
207266	Mr Tarek Saad [131899]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Clear as day
207159	Mr Tomasz Dyl [131884]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	That s ok.
207289	Mr Zbigniew Ulanowski [131897]		Question 7: Do you agree that it is clear how CIL will operate	Support	yea

			alongside Section 106 Planning Obligations?		
209405	Mrs Louise Simmonds [132043]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	While we recognise there is no longer a requirement to publish a Regulation 123 list, in the interests of clarity we would strongly encourage the Council to publish a list of infrastructure items that are intended to be funded through CIL and those items that will remain as S106 obligations.
207295	Mrs Marilyn Ballisat [131903]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes it is clear
207280	Ms Lesley Nicholls [131902]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Support
207218	Ms Tanya Baker [131888]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	I disagree with some recent planning decisions. How the new Waterbeach Station was approved without toilets for example
209378	NHS Cambridgeshire and Peterborough Integrated Care Board [131754]	NHS Property Services Ltd (Mr Mark Adams) [129763]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Further clarity is required on the impact of the introduction of CIL, and how contributions towards health and other infrastructure will be affected. If the CIL funding for transport infrastructure is secured through CIL, we would expect to see a clear commitment and support from the Council and Local Plan Policy to ensure that funding and mitigation to support new/improved health infrastructure to support growth is

					supported and prioritised. This should be made clear within emerging policy.
209541	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No, it is not entirely clear. Further clarity is required. Whilst we understand that the proposed CIL will relate to strategic infrastructure, with all other matters covered by S106 Obligations. However, there is a risk of overlap and potential double-charging. Furthermore, there is already an expectation of some Highway works via S278; there is a new Greater Cambridge Planning Obligations SPD to be adopted; plus there are additional layers of future governance which could potentially include additional CIL mechanisms, including the SDS and a possible Development Corporation.
209524	Places for People [131604]	Ceres Property (Mr David Fletcher) [130250]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Yes, it is clear how CIL will operate alongside Section 106 obligations and this has been clearly defined in the consultation.
209577	S Page [130882]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	Not clear to me what will be provided by either when it comes to both new infrastructure, maintaining existing infrastructure and, as critical, routes and frequencies of buses.
209372	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent agrees with the clarity of how CIL will operate alongside Section 106 planning obligations and supports the continuation of S106 for community infrastructure and improvements. The respondent suggests widening the beneficial area for CIL payments from large development sites beyond the parish boundary where the development is located, particularly for sites along the A14 that impact surrounding villages.

					The respondent raises concerns about how CIL benefits will be allocated, questioning if they will be restricted to transport improvements in the parishes of the development, despite impacts on multiple surrounding parishes. The respondent requests consideration for regulations that allow CIL benefits to be used more widely to address the broader impact of large developments.
209570	Trinity College, Cambridge (Emma Woods) [132073]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The relationship between CIL and S106 for strategic sites requires clarification and is not adequately addressed. At present: • There is insufficient explanation of the circumstances in which S106 obligations will be used to address infrastructure requirements at strategic sites rather than, or in substitution for, CIL. • The Infrastructure Statement does not clearly identify which elements of the infrastructure programme are intended to be delivered through S106 at strategic sites, and which through CIL receipts. • There is no clear explanation of how the Councils will avoid the double-counting of infrastructure contributions where a strategic site is already making substantial S106 commitments (for example, in relation to transport, utilities, public realm and employment floorspace delivery). • There is no flexibility for employment led sites (the Councils merely identify a reduction in affordable housing on residential sites as a 'safety value' to overcome viability issues). • There is no clarity on when infrastructure funds will be spent

					to support the delivery of strategic sites. Whereas 100% of s.106 contributions which are identified as mitigation for strategic transport will be spent on strategic transport, that is not the case for CIL whereby a significant proportion will be earmarked for other uses, significantly reducing the monies available for investment in strategic transport.
209322	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Greater clarity on how CIL will interact with Section 106 and across council areas (where planning obligations involve more than one local authority) will be important.
207358	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	It is clear
209432	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	Authorities typically exclude strategic sites from CIL due to complexity and viability issues, with Section 106 agreements being preferred. Larger strategic sites relying on strategic infrastructure delivery at or near to the site rather than contributing to a generic CIL fund. for example Grange Farm's development depends on the CSET scheme, highlighting the need for Section 106 funding to ensure public transport and active travel options. Strategic sites in the draft plan, such as Eddington and CBC, should be nil rated for CIL unless a clear definition of strategic versus development-specific infrastructure is provided.

					The proposed CIL approach may not expedite development as it only addresses strategic transport, leaving other impacts requiring Section 106 agreements. Lack of clarity on what constitutes 'strategic' transport impacts could lead to delays in application determinations.
209476	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	No observations.
209346	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	No objection in principle. The Parish Council recognises that instalment policies are intended to support development viability and developer cashflow. However, it is also important that infrastructure funding is received in a timely manner to ensure that infrastructure can be delivered alongside development. The Parish Council therefore supports the principle of an instalment policy but encourages the councils to monitor its operation to ensure that infrastructure delivery is not delayed.
209414	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Barratt welcomes the draft instalment policy however further clarification is required. The instalment policy refers to the total CIL liability but does this allow for the liability of phased developments? Barratt wish to see this clarified, and allowance made for the ability to phase development as this will significantly improve the balance between income and cashflow.
209560	Cambridge Biomedical Campus (Mr Ed Watson,		Question 8: Do you agree that the draft instalment policy strikes the right	Comment	An instalment policy is essential for development of the scale envisaged on the campus. However CBCL is not a landowner or developer and will therefore not be liable to pay the CIL.

	Strategic Planning and Place Advisor) [130389]		balance between income and developer cashflow?		• Notwithstanding, the split proposed for the larger schemes with CIL charges over £500,000 is reasonable. Noting any event the transport schemes for the campus that the CIL will support will need to be forward funded by some other mechanism if they are to be delivered in a timely manner. In this context CIL will be a retrospective payment.
208793	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Cambridgeshire ACRE considers that the proposed instalment policy appears proportionate and provides a reasonable balance between ensuring timely collection of CIL receipts and recognising the cashflow constraints faced by developers. Staged payments for larger liabilities should help maintain development viability while still ensuring that infrastructure funding is secured. It will be important that the approach allows infrastructure investment to be delivered in a timely way so that communities see the benefits of development alongside growth.
209511	Cambridgeshire County Council and Prologis [132051]	Quod (Mrs Georgina Thomson, Associate) [7297]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	No, the thresholds are considered to be too low given the scale of payments that may be generated by the proposed CIL rates. We request that these are extended to improve the viability of development proposals. For very large contributions, the instalment policy should take a longer term approach. In Oxford the instalment policy for sums over £2m is: 1st instalment, 25% within 60 days; 2nd instalment, 25% by end of year 1; 3rd instalment, 25% by end of year 2; 4th instalment ,25% by end of year 3.

					This approach should be replicated given the similar CIL rates proposed.
209502	Croudace Homes (Hem Johal) [132008]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	The current payment dates for CIL liability do not consider the occupancy of units, leading to financial strain on developers before generating income. The negative cashflow implications for small and medium-sized sites should be acknowledged, as they may face significant interest costs. A more proportionate approach with tailored payment plans for larger sites is recommended to alleviate financial pressure. Developments may stall for reasons beyond the developers' control, and requiring payment before sales can disproportionately impact smaller businesses.
207272	Dr hedda Joyce [131900]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	while developer's cashflow is important to consider, the interest of the long term needs of the community they build for will not be their priority and it is high time this view is built into all development projects.
207201	Dr Nazima Pathan [131887]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Strongly agree with this
209442	Fowlmere Parish Council (Angela)		Question 8: Do you agree that the draft instalment policy	Comment	We have no view on this and reserve our position.

	Mulholland, Parish Clerk) [130417]		strikes the right balance between income and developer cashflow?		
208685	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Yes . However there is a need for explanation of infrastructure CIL delaying payments to parish councils. Parish Councils can not commission work without total funds being made available-so larger infrastructure projects are likely to experience a delay of at least 2 years from commencement of approved development before infrastructure projects are able start on site. The occupiers of approved developments will have moved in and not be able to access completed infrastructure projects on new developments. Payments should be as up front as possible to enable delivery of community infrastructure projects at the front end of the development scheme.
209491	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Support is given to South Cambridge District Council's proposed instalment policy, particularly in respect of projects with a CIL Liability of over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months.
209452	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Yes
209314	Little Shelford Parish Council (Mrs Beckie Whitehouse,		Question 8: Do you agree that the draft instalment policy strikes the right balance between	Support	yes

	Clerk/RFO) [131311]		income and developer cashflow?		
209306	Little Wilbraham and Six Mile Bottom Parish Council (Hayley Livermore) [131216]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	We agree that the draft instalment policy strikes the right balance between income and developer cashflow
209389	Maria Cleminson [131415]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Yes
207225	Miss Caroline Blackmun [131891]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Seems a good balance.
207243	Mr Anthony Lock [131893]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Yes. there should be a cutoff though that the liability is paid in full before occupation of any of the buildings in a development.
207184	Mr James Nadin [131885]		Question 8: Do you agree that the draft instalment policy strikes the right balance between	Support	.

			income and developer cashflow?		
207257	Mr Jeremy Baumberg [9264]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	This seems well evidenced.
207113	mr Matthew Tennant [3315]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	I agree that the Council has met all regulatory requirements
207376	Mr Michael Maries [120571]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	No not enough information
208566	Mr Mike Evans [131774]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Developers are making excessive profits and could pay more if they raise capital to pay up front there is less risk of developers putting companies into administration before all obligations are fulfilled.
207329	Mr Rob Ward [131907]		Question 8: Do you agree that the draft instalment policy strikes the right balance between	Object	Please see my previous comments.

			income and developer cashflow?		
205627	Mr Roger Crabtree [130954]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	no comments
207160	Mr Tomasz Dyl [131884]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	The idea is simply communist. Creates more obstacles than sollutions.
207287	Mr Zbigniew Ulanowski [131897]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	No, the policy is overly generous to developers.
209406	Mrs Louise Simmonds [132043]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Redrow welcomes the draft instalment policy however further clarification is required. The instalment policy refers to the total CIL liability, but does this allow for the liability of phased developments? Redrow would wish to see this clarified, and allowance made for the ability to phase development as this will significantly improve the balance between income and cashflow.
207299	Mrs Marilyn Ballisat [131903]		Question 8: Do you agree that the draft instalment policy strikes the right balance between	Support	Yes the balance is fair to developers and the council (on behalf of the local residents)

			income and developer cashflow?		
207282	Ms Lesley Nicholls [131902]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Support
207219	Ms Tanya Baker [131888]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The Developers will object
209542	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	No. For multi-phase strategic developments, we support longer instalments and occupation-linked triggers, plus a deferral provision for situations where there is market stress. This would allow CIL payments to better align with sales/income while safeguarding delivery. Small sites should retain simple 2–3 stage options.
209373	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Yes
207359	University of Cambridge (Miss Melanie Rist, Veterinary		Question 8: Do you agree that the draft instalment policy strikes the right	Object	See previous comments. How many people can the community support before resources run out

	Radiographer) [131908]		balance between income and developer cashflow?		
209433	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	It is important that the instalment policy reflects the realities of phased and complex developments, which may involve longer build out periods and multiple delivery stages. Clarity around commencement will also be important, particularly where pre commencement conditions or ongoing Section 106 discussions affect when development can actually begin. The point at which the levy becomes payable should align with these practical stages. As with any new charging regime, clear communication about implementation and transition will help provide certainty for those progressing schemes.
209347	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The Parish Council has no evidence to suggest that regulatory requirements have not been met. Based on the information provided in the consultation documents, Bar Hill Parish Council has no reason to believe that the councils have failed to meet the relevant regulatory requirements associated with preparing the CIL charging schedule. However, the Parish Council emphasises the importance of transparency and continued engagement with local communities throughout the implementation of the levy.
209415	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	As above, until such time as the viability information which underpins the draft CIL charging schedule is resolved, Barratt reserves the right to consider that not all regulatory requirements have been met.
207309	Bob Ward [130114]		Question 9: Do you agree that the	Support	Irrelevant

			Council has met all regulatory requirements?		
209424	Cambridge Ahead (Emma Pritchard) [130653]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Cambridge Ahead has no specific comments on regulatory compliance but would emphasise the importance of transparency, clarity and consistency in implementation.
209561	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Yes
208794	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Cambridgeshire ACRE considers that the consultation appears to follow the appropriate regulatory process, with supporting evidence and consultation documents published to allow stakeholders to review the proposed charging schedule and provide feedback. Clear and transparent processes are important to ensure confidence in the system and to help communities understand how infrastructure funding will support planned growth across the Greater Cambridge area.
209503	Croudace Homes (Hem Johal) [132008]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Yes, the Council has met its regulatory requirements through consultation.
207284	Dr hedda Joyce [131900]		Question 9: Do you agree that the Council has met all	Comment	this is outside my expertise

			regulatory requirements?		
207202	Dr Nazima Pathan [131887]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	I agree
209443	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	We have no view on this and reserve our position.
208699	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Regulation 59A mandates a portion of CIL payments to be allocated to town and parish councils for large infrastructure projects, specifically 15% or 25% for those with an adopted Neighbourhood Plan. The Greater Cambridge Infrastructure statement minimally addresses the role of Parish/Town Councils and Neighbourhood Plans, referencing them only once. It is suggested to include a detailed paragraph on the communication protocol between the authority and town/parish councils, outlining the amount, timescale of resources, and legal requirements. Some Neighbourhood Plans contain identified infrastructure requirements that should be referred to.
209466	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	met

209465	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Obligations met
209492	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	No, for the detailed reasons set out within these representations, the Council has not met all regulatory requirements. •It is considered the Council should offer discretionary charitable relief available under Reg 44. •It is considered the Council should offer exceptional circumstances relief available under Reg 55.
209481	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	See comments above.
209453	Linton Parish Council (Mrs Jenny Seaward, Parish Clerk) [104763]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	To the best of our knowledge
209315	Little Shelford Parish Council (Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	yes
209305	Little Wilbraham and Six Mile Bottom Parish Council		Question 9: Do you agree that the Council has met all	Support	We agree that the council has met all its regulatory requirements

	(Hayley Livermore) [131216]		regulatory requirements?		
209547	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	See Letter Submission
209390	Maria Cleminson [131415]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Yes
207244	Mr Anthony Lock [131893]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	No comment.
207114	mr Matthew Tennant [3315]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	I do not have any comments on how you feel the neighbourhood portion should be distributed.
207377	Mr Michael Maries [120571]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	That all they do
208567	Mr Mike Evans [131774]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Yes
207330	Mr Rob Ward [131907]		Question 9: Do you agree that the	Object	Please see my previous comments.

			Council has met all regulatory requirements?		
205628	Mr Roger Crabtree [130954]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	no comments
207161	Mr Tomasz Dyl [131884]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	IT is waste of council time. If it will be introduced, more bureacrats need to be employed to deal with Levy scheme.
207283	Mr Zbigniew Ulanowski [131897]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Yes
209407	Mrs Louise Simmonds [132043]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	As above, until such time as the viability information which underpins the draft CIL charging schedule is resolved, Redrow reserves the right to consider that not all regulatory requirements have been met.
207301	Mrs Marilyn Ballisat [131903]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Yes regulatory requirements are met
207285	Ms Lesley Nicholls [131902]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Support
207220	Ms Tanya Baker [131888]		Question 9: Do you agree that the	Comment	Again, this is not my area of expertise

			Council has met all regulatory requirements?		
209543	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	No. We have concerns regarding: • the evidence that has been used to support the proposed CIL charges; • the adequacies of the infrastructure list that has been used; and • whether developer engagement has been proportionate and representative. These matters should be reviewed carefully, and further consultation undertaken if required to ensure compliance and robustness ahead of any Examination.
209374	Swavesey Parish Council (Ms Linda Miller, Clerk) [131173]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	Yes
209571	Trinity College, Cambridge (Emma Woods) [132073]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The evidence base does not meet Regulation 14 requirements for R&D typologies, particularly regarding construction costs and economic viability. The Viability Report fails to model construction costs for specialist R&D and laboratory buildings as a separate development typology. The Viability Report does not apply appropriate net-to-gross ratios for laboratory buildings.

					The report does not account for the full costs of compliance with Local Plan sustainability policies for energy-intensive R&D uses. The evidence base does not prove that proposed commercial rates will not jeopardise the viability of specialist R&D development in Greater Cambridge. A supplementary R&D-specific viability appraisal should be conducted, published, and consulted on before the Draft Charging Schedule is submitted for examination.
207360	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 9: Do you agree that the Council has met all regulatory requirements?	Support	I'm sure they were very careful to make sure they did
209478	Abbey Properties Cambridgeshire Limited (Mr Andy Brand, Planning Director) [7930]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No comment.
205648	B Nicolson [5745]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	I believe there was plan to draw up a list of scheme to pick from, rather than scrabble around for something to spend money like this on. Asking councillors, stakeholders and maybe residents too could be useful.
209348	Bar Hill Parish Council (Kate Flack, Parish Clerk) [132049]		Question 10: Do you have any comments on how you feel the neighbourhood	Comment	Bar Hill Parish Council emphasises the importance of ensuring that communities experiencing development pressures receive meaningful benefits from the neighbourhood portion of CIL funding.

			portion should be distributed?		The Parish Council considers that the neighbourhood portion should be distributed in a manner that is: • Transparent, with clear criteria for the allocation of funding; • Locally responsive, enabling parish councils to identify local infrastructure priorities; and • Proportionate to development impacts, ensuring that areas experiencing greater levels of development receive appropriate support. Ensuring that local communities can see tangible benefits from development is important for maintaining public confidence in the planning system.
209416	Barratt Homes (Northampton) [132058]	Carter Jonas (Mr Duncan Mason, Associate Planner) [131672]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No comment
209425	Cambridge Ahead (Emma Pritchard) [130653]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Cambridge Ahead supports the principle that communities where development takes place should benefit directly from investment through the neighbourhood portion of CIL. Where significant sums are generated, it will be important that there is clear governance, transparency and accountability around how funding decisions are made and how money is spent. Regular reporting on allocation and expenditure would help maintain confidence that funds are being used effectively and in a timely way. Cambridge Ahead would welcome further consideration of how this would operate in practice. There may also be opportunities for neighbouring areas to work together where appropriate to deliver projects that benefit a wider community.

209562	Cambridge Biomedical Campus (Mr Ed Watson, Strategic Planning and Place Advisor) [130389]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	We support the idea that a proportion of the CIL is spent locally on improvements related to the strategic transport schemes it is supporting. We encourage early engagement with the active communities in the area around the Campus. We are happy to provide the contact details of those groups with whom we work closely.
209397	Cambridge Cycling Campaign (Ms Anna Williams, CEO) [925]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Cambridge must not miss out on its neighbourhood portion due to the absence of Parish Councils. Community consultation on how neighbourhood portions in Cambridge should be spent will be vital.
207456	Cambridge Group of Ramblers (Jane Crawford-White, Group Chair) [130382]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	As Ramblers we would like to see the 15% neighbourhood portion invested in connecting PROWs. Specifically a PROW to connect Cherry Hinton with Wandlebury and the Beechwoods that avoids the highly dangerous Lime Kiln Hill that is accessible and appealing for all non motorised users.
208717	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	Supporting the CIL proposals; requesting that the Neighbourhood projects 10% is available for leisure walking, not just 'active' travel. Residents of the Greater Cambridge area take part in more leisure walking activities than 'utility' walking and there is no reference anywhere to the Rights of Way Improvement Plan as a key guide to new walking/cycling routes.
208724	Cambridge Group of the Ramblers (Jill Tuffnell, Secretary) [8914]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	This share should be available to support leisure walking which is woefully neglected in the policies, plans and schemes listed. Residents of South Cambridgeshire are more likely to walk for leisure purposes than for utility reasons and even in Cambridge leisure walking is very important. One-third of households own dogs and they need exercising, preferably away from traffic, cycles and on a soft surface. It is also vital that gaps in the rights of way network are filled,

					enabling residents to walk to Wandlebury, the Beechwoods and Roman Road. A safe route next to Lime Kiln Hill please.
208829	Cambridge Past, Present and Future (Ms Sarah Nicholas, Principal Planning Officer) [1801]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The neighbourhood portion must be distributed transparently to ensure that the communities directly impacted by development see tangible benefits. Given the proposed low CIL rate for housing, there is a significant risk that the neighbourhood portion will be too small to fund meaningful local improvements, further highlighting the need to revise the £60/sqm rate upward.
208795	Cambridgeshire ACRE (Mrs Hayley Neal, Chief Executive) [131460]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Cambridgeshire ACRE believes the neighbourhood portion should be distributed in a way that is transparent, place based and clearly linked to the impacts of development on local communities. Funding should prioritise the areas most directly affected by growth and support infrastructure that helps communities absorb development well. This includes local facilities such as community buildings, village halls, green spaces and active travel connections. Clear guidance should also ensure that rural communities and smaller settlements benefit fairly, particularly where even modest development can place additional pressure on local infrastructure.
207368	Catarina Campos [130646]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Should be 100%. To counterbalance the effects on affected communities.
209504	Croudace Homes (Hem Johal) [132008]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The neighbourhood portion should be distributed fairly, and primarily towards smaller communities who have taken development and will therefore need, and benefit from it most. The large majority of transport related infrastructure is currently focused on large strategic sites.

207205	Dr Nazima Pathan [131887]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	It is clear that areas like Trumpington have been massively developed yet it remains a village with little more than a supermarket that is a traffic hotspot for the City and little else in terms of infrastructure. And the roads (even Addenbrookes road let alone trumpington and Shelford Roads) have been massively impacted.
209444	Fowlmere Parish Council (Angela Mulholland, Parish Clerk) [130417]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Fowlmere is in South Cambridgeshire, not Cambridge City; accordingly we are not responding on this question.
208701	Gamlingay Parish Council (Mrs Kirstin Rayner, Parish Clerk) [7618]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	There needs also to be an additional section of how the neighbourhood portion will work outside Cambridge- see answer to question 9, and in areas where there is an adopted Neighbourhood Plan
209467	Great Shelford Parish Council (Mrs Nicola Webster, Clerk) [6190]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	City question only
209482	Juniper Propco (Bourn) Limited [132062]	Lichfields (Jennifer Woods) [132061]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	See comments above
209454	Linton Parish Council (Mrs Jenny Seaward,		Question 10: Do you have any comments on how you feel the neighbourhood	Comment	N/A

	Parish Clerk) [104763]		portion should be distributed?		
209316	Little Shelford Parish Council (Mrs Beckie Whitehouse, Clerk/RFO) [131311]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	no
207250	Lord Lord Richard Balfe [131895]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	This is a terribly badly designed questionnaire
208807	Maria Carvalho [132017]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	It should be used to fund neighbourhood teams and projects. Remove barriers. Asset based community development. A pot of funding to encourage a new way of working to best support residents needs
209391	Maria Cleminson [131415]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	We agree that CiL is preferable to S106 and believe that local councillors should decide about the 15%. It is vital that it is in the hands of our democratically elected representatives to whom we can appeal directly.
207245	Mr Anthony Lock [131893]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The Section 106 charges should already cover all the local increases in infrastructure (and should be raised until they do). The CIL is for more strategic increases in transport and other infrastructure. Locally this 15% could be used to integrate the two - e.g. bus routes increased via the new development, integration of cycle routes into the cycle routes already provided in the new development.

208845	Mr Bruno Poltronieri [132028]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Seems like it should be more than 15%.
207316	Mr Cristiano Belloni [131905]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Object	I object that the development should be funded in the first place. Use everything on the neighbourhood and nothing on new developments.
207258	Mr Jeremy Baumberg [9264]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	This is ideal for consultation at local level through existing councillors. I would suggest non-car transport infrastructure is the right focus, given the ire about potholes, bike and bus infrastructure etc.
207302	Mr jonathan williams [131904]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Object	please NO MORE TAX
207418	Mr Kevin Ramsden [131915]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Object	How much will go to the development corporation when it is given planning powers for Cambridge?
208568	Mr Mike Evans [131774]		Question 10: Do you have any comments on how you feel the neighbourhood	Comment	The question is inappropriate for consultation. If we do not know how the details will be decided then we do not know how to respond. My suggestion is that local ward councillors should be able to

			portion should be distributed?		decide how the 15% is spent after consulting with their residents. The money should be spent in the ward the development happens in.
207331	Mr Rob Ward [131907]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Object	Please see my previous comments.
205631	Mr Roger Crabtree [130954]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	no comments
207267	Mr Tarek Saad [131899]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	Local transport infrastructure is sorely lacking
207162	Mr Tomasz Dyl [131884]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Only 15%?? is it a joke??
207288	Mr Zbigniew Ulanowski [131897]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Object	No

207303	Mrs Marilyn Ballisat [131903]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	I believe it should be spent on repairing potholes and improving drainage in roads liable to flooding in heavy rain
208893	Mrs Sally Walmesley [130580]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Steeple Morden Councillors are concerned over the difference in contribution for a Parish with and without a Neighbourhood Plan, and would like all councils to get 25%
207430	Ms Flynn Lebus [131931]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The neighbour hood portion is likely the most straightforward aspect of the CIL - local nursery/primary school, pharmacy, bus stop/public transport, secure water supply, cycle routes, maintenance of biodiversity/nature strategies and investments (climate adaptation investments), local energy battery from renewable sources. The wider implications are on the broader infrastucture of Cambridge -> the roads are a priority given risk to cyclists, drivers. Might this funding be a way to fund a tram system, to better finance state schools, strengthen resilience of water supply and maintain protection of green spaces, etc.
207286	Ms Lesley Nicholls [131902]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	Support
209525	Ms Shelley Gregory-Jones [132067]		Question 10: Do you have any comments on how you feel the	Support	Small, local wildlife charities like Cambridge Hedgehogs are in need of support to enable them to provide education services to residents and hospital services for injured and

			neighbourhood portion should be distributed?		sick hedgehogs. Across the UK hedgehogs are an endangered species, but Cambridge has a significant urban population and, as a community, we have a responsibility to protect and care for it.
207221	Ms Tanya Baker [131888]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No information provided, so can't comment
209323	Trinity Hall (Tim Harvey-Samuel, Bursar and Steward) [9736]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	BPSC contends that proceeds should benefit those areas where development is taking place. Clear governance and regular transparent reporting on the sourcing and deployment of funding generated from CIL will be absolutely essential.
207361	University of Cambridge (Miss Melanie Rist, Veterinary Radiographer) [131908]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Support	On what is needed to support the community, not a way to bring in trade
209434	University of Cambridge [130704]	University of Cambridge (Mr Mark Parsons) [7290]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	We assume that the neighbourhood portion would need to be spent on strategic transport items only, rather than on general community uses. This point would benefit from clarification. The University would want to ensure measures will be in place to ensure these payments are truly spent for the reason they are collected for.

Appendix C Representations received by letter summarised

Id	Respondent	Agent name	Topic	View	Representation
209867	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle of a CIL that is transparent, evidence-based and aligned with the delivery of strategic infrastructure across Greater Cambridge. However, the current Draft Charging Schedules raise several areas of concern that must be addressed to ensure that CIL does not inadvertently undermine the delivery of nationally significant higher-education, research and health-related development within the region.
209599	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The implication of introducing CIL is that developers would seek a reduction in affordable housing in order to pay for CIL alongside existing Section 106 contributions.
209773	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209686	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209590	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The implication of introducing CIL is that developers would seek a reduction in affordable housing in order to pay for CIL alongside existing Section 106 contributions.

209844	British Land (David Bloy, Planning Director) [132085]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent considers that introducing a Levy now, while the region is also undergoing local government reorganisation, establishing a Development Corporation, and finalising a new Local Plan, adds avoidable complexity that could delay schemes at a time when government and partners are seeking to accelerate growth in the region. Consultation is currently underway on the establishment of a new Development Corporation in Greater Cambridge. The respondent strongly support this and sees the Development Corporation as essential to building on the work of Greater Cambridge Shared Planning Service, unlocking investment and accelerating growth by addressing the region's most significant infrastructure challenges. However, the Corporation's activities, objectives, boundaries and planning powers have not yet been defined, and the timing of its formal establishment remains unclear. Together, this creates uncertainties around how the future planning and development landscape will operate in practice.
209871	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209665	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes. Surveys have consistently shown that people in the area would like to use public transport and active travel more, however the infrastructure and services required to make sustainable travel a genuine option for everyone is not in place. A lack of funding to deliver new infrastructure and services is a key barrier to achieving the sustainable transport our communities require, and a CIL would raise some of the money required every year. When local authorities are required to bid for limited central government funds, longer-term planning is difficult or impossible. Local authorities are

					best placed to plan and deliver new transport infrastructure when funding mechanisms are long-term and under their own control; CIL funding fulfils both of these criteria.
209660	Cambridge Group of Ramblers (Jane Crawford-White, Group Chair) [130382]		Question 3: Do you agree that the Council should introduce CIL?	Support	As Ramblers we fully support the business case for the Planning Authority to implement raising funds via the CIL.
209789	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent 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.
209675	Cambridge Living Streets (Linda Jones) [132081]		Question 3: Do you agree that the Council should introduce CIL?	Support	Cambridge Living Streets support in principle the proposal to introduce CIL as a means of beginning to bridge the funding gap.
209853	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent supports the principle of a CIL Charging Schedule that requires all scales of developments to make a contribution to fund infrastructure required to support new development in Greater Cambridge. The respondent believes that there has been a consistent under funding of essential social and physical infrastructure, necessary to support our communities. The introduction of CIL would ensure a clear, transparent basis for collecting financial contributions from development, to support delivery of the necessary infrastructure the area needs. Creating greater certainty should also help ensure development continues to come forward, providing rates are set that do not prevent or unduly delay development.

209608	Dr Alan Lawrence [131259]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Yes. There is a significant shortfall in the funding required to create a good transport network for walking and wheeling, and bus funding is unclear. Also the council will be better able to make long term plans given a reliable source of funding as opposed to piecemeal negotiations on S106s.
209580	Edward Leigh [132083]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Possibly, but the greater need is for an up-to-date and comprehensive transport strategy and plan for the region. This was identified in the council's response to the Developer Contributions SPD consultation: Through engagement with Cambridgeshire County Council and the Combined Authority, the Councils are working to get to this position through the preparation of the Greater Cambridge Transport Strategy that will set out the transport infrastructure required to support growth across the area over the short to long-term. The Strategy, and its supporting evidence, is required to secure contributions (either S106 or CIL) as suggested. In the absence of the Strategy, contributions towards strategic transport infrastructure will need to be determined on a development-by development basis, having regard to a development's assessed impacts. Ref: https://scamborough.gov.uk/documents/s142124/App%203.pdf page 118 That would do more to address the funding shortfall than CIL because it would allow the LPAs to secure more funding for transport infrastructure and services.
209902	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle that development should contribute towards the delivery of necessary infrastructure. However, is worried that the timing of the CIL consultation is not yet appropriate, given the other consultations currently underway and the potential impacts these may have. The purpose of this representation is not to

					oppose CIL; rather, it seeks to ensure that a reasonable rate is set which enables planned development in the area to come forward.
209639	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes CIL offers a fairer and more predictable means of funding essential community and infrastructure improvements. For Girton this is particularly important because: • the parish has limited development opportunities and therefore receives few Section 106 contributions • yet faces significant infrastructure pressures created by movements through the village from Girton, Histon, Oakington, Eddington and North West Cambridge • and requires investment in pavements, verges, drainage, open spaces, community facilities and active-travel infrastructure Established communities like Girton risk falling behind newer developments that benefit from major upfront infrastructure investment. CIL helps rebalance this by enabling strategic contributions from wider growth to support the infrastructure that existing villages rely on. Girton Parish Council also recognises that long-term community sustainability requires a balanced and realistic approach to future development. While the parish values the distinct identity of Girton and wishes to avoid unmanaged expansion or loss of character, we also acknowledge the need for affordable homes for younger residents, improved primary care capacity and investment in recreation, burial land and open space. Development Corporations typically rely on value capture from land uplift to fund infrastructure; however, much of the uplift from Local Plan allocations has already been realised. This may mean that future infrastructure funding will need to come from land outside existing allocations, including publicly owned land, provided that any such development is plan-led,

					infrastructure-funded, aligned with Neighbourhood Plan principles and capable of delivering genuine community benefits.
209934	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent has no “in principle” objection but makes the following comments. The two charging authorities have come to the decision to introduce CIL comparatively late, having relied up to now on Section 106 obligations. The respondent is concerned to ensure there is no “double counting” in respect of the ongoing S.106 regime and the introduction of CIL with the authorities continuing to use S. 106 obligations as the primary mechanism for securing community and on-site infrastructure. The respondent has registered charitable status and is concerned there is no reference in the consultation to the CIL Regs provisions for Mandatory (Reg 43) and Discretionary (Reg 44) charitable relief, especially given the importance of the University and its colleges locally, nationally and internationally. The respondent would seek such relief on relevant projects and ask that both mandatory and discretionary relief provisions are included within the proposed CIL.
209633	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The CHA acknowledges that there is a need for more Community Infrastructure as well as proper maintenance of existing infrastructure and as a matter of principle agrees that new development should pay for incremental infrastructure demanded by that development and that the cost of maintaining existing infrastructure should be borne across the wider body of new and existing development.
209766	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle that development should contribute towards the delivery of necessary infrastructure. However, the respondent is worried that the timing of the CIL consultation is not yet appropriate, given the other consultations currently underway and the potential impacts these may have. The purpose of this representation is not to oppose CIL; rather, it seeks to ensure that a

					reasonable rate is set which enables planned development in the area to come forward.
209920	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 3: Do you agree that the Council should introduce CIL?	Comment	Whilst there is no in principle objection to CIL, in our representations we have raised concerns about the potential for double counting of contributions through the use of CIL and S106 in tandem. In addition, we have raised serious concerns with the proposed CIL charging schedule as drafted.
209625	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 3: Do you agree that the Council should introduce CIL?	Support	Yes. CIL provides a clearer and fairer way to secure funding for essential infrastructure. Histon & Impington requires investment in pavements, crossings, drainage, green spaces, recreation facilities and community buildings, but receives few direct Section 106 contributions because major developments are located outside the parish boundary. Despite this, the parish acts as the functional centre for the area, absorbing a significant share of the travel, school-route and recreation pressures created by the surrounding settlements and city-edge developments. CIL provides one of the only mechanisms through which established communities can secure a fair share of strategic infrastructure investment.
209949	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle of ensuring that development contributes appropriately and proportionately towards the infrastructure required to support growth. However, it is important that the proposed CIL does not undermine the deliverability of strategic sites that are already making substantial infrastructure contributions through Section 106 obligations.
209615	IWM Duxford [101244]	Turley (Ms Jenny Page,	Question 3: Do you agree that the	Comment	The respondent supports the introduction of CIL in principle. The need to deliver appropriate infrastructure for the expected growth in Greater Cambridge is acknowledged and

		Director) [8711]	Council should introduce CIL?		this will have to be secured through a number of sources. It is questioned whether the timing is appropriate given that the draft Greater Cambridge Local Plan has only just passed Regulation 18 consultation. The Charging Schedule would be in place well in advance of the adoption of the Greater Cambridge Local Plan. The Local Plan will set out the quantum, location and nature of future development. This has yet to be considered through Regulation 19 consultation or Examination. It is questionable whether assumptions can be made about actual infrastructure requirements for the delivery of individual sites and strategically on the basis of a draft Plan which is yet to be submitted for Examination and can only reasonably be given limited weight.
209942	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 3: Do you agree that the Council should introduce CIL?	Support	The respondent supports the introduction of CIL in principle — but only if CIL rates for employment/logistics development remain viability-positive and competitive in the wider region. The Council's intention to fund strategic transport infrastructure through CIL is clearly set out in the draft consultation documentation. However, CIL needs to be proportionate to the highways improvements which are often site specific. The respondent considers that CIL should not apply to industrial and logistics sites because Industrial/logistics schemes often operate on low margins and face high infrastructure costs, Regional comparisons show that most authorities set CIL at £0 for B-class employment uses, Employment land in Greater Cambridge is strategically essential, Evidence base does not sufficiently assess logistics viability, Employment developments already secure economic and infrastructure benefits, CIL could reduce—rather than increase—infrastructure delivery.
209807	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed,

					necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209847	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 3: Do you agree that the Council should introduce CIL?	Object	The respondent 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.
209895	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports the principle that development should contribute towards the delivery of necessary infrastructure. However, is worried that the timing of the CIL consultation is not yet appropriate, given the other consultations currently underway and the potential impacts these may have. The purpose of this representation is not to oppose CIL; rather, it seeks to ensure that a reasonable rate is set which enables planned development in the area to come forward.
209909	Martin Grant Land and Endurance Estates (Caxton) Ltd [132095]	Savills (Abigail Jones) [132076]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent comments that the purpose of the representation is not to oppose CIL in principle, but to ensure that any adopted rate enables planned development to come forward.
209647	Ms Hannah Brown [9404]		Question 3: Do you agree that the Council should introduce CIL?	Comment	First, it is noted that the preference for CCC is to retain s.106 agreements as the main source of funding. I disagree with this approach. The CIL format is a clear and transparent

					means of ensuring that the charging is uniform throughout the district and is not subject to developer influence.
209662	National Highways (Mr Philip Porter, Assistant Spatial Planner) [130283]		Question 3: Do you agree that the Council should introduce CIL?	Comment	We have reviewed the document and note that the details set out within the document are unlikely to have a severe impact on the operation of the trunk road and we offer No Comment.
209652	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 3: Do you agree that the Council should introduce CIL?	Comment	Both Newlands and Tritax recognise the need to fund critical infrastructure (e.g. water, power, roads, East West rail, etc) in Greater Cambridge via a range of sources. However, strategic industrial and logistics sites are essential for meeting local plan targets for employment uses. Such development faces significant upfront expenditure on infrastructure which materially impacts on scheme viability. Applying an arbitrary standard CIL rate will render such sites economically unviable resulting in stalled development. Therefore, a zero-rated CIL approach supported by appropriate S106 obligations (where required) is strongly recommended for strategic employment sites and is something that currently works well elsewhere.
209956	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises the need to fund critical infrastructure (e.g. water, power, roads, East West rail, etc) in Greater Cambridge via a range of sources. However, strategic industrial and logistics sites are essential for meeting local plan targets for employment uses. Such development faces significant upfront expenditure on infrastructure which materially impacts on scheme viability. Applying an arbitrary standard CIL rate will render such sites economically unviable resulting in stalled development. Therefore, a zero-rated CIL approach supported by appropriate S106 obligations (where required) is strongly recommended for strategic employment sites and is something that currently works well elsewhere.

209658	Philippa Slatter [132075]		Question 3: Do you agree that the Council should introduce CIL?	Comment	Having been very much involved in the planning and development on the Southern Fringe both as an elected councillor and as a resident, I am writing to emphasise the need for CIL agreements to include appropriate infrastructure as soon as new residents move in. As we know, larger developments can take decades to complete, and even longer for adoption to be resolved. This leaves many new residents without even basic health and education provision, or in competition for resources with 'older' residents of nearby settlements.
209817	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209879	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209837	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises and supports the need to secure funding for strategic infrastructure to enable sustainable growth and close the infrastructure gap in Greater Cambridge. A clear and proportionate local funding approach also shows Government that Greater Cambridge is committed to supporting infrastructure delivery alongside national investment. The respondent recognise the rationale for introducing a mechanism such as CIL to support infrastructure delivery. However, there are significant concerns that the current evidence base does not yet fully reflect the realities of delivering development in Greater

					Cambridge, and greater clarity is needed around the assumptions underpinning the viability evidence.
209861	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent comments that the Councils are consulting on CIL at a time when the emerging Local Plan remains untested and key strategic growth locations are still subject to consultation. The PPG requires that CIL viability testing reflects planned development and the scale and nature of sites on which the plan relies. In the absence of testing for strategic sites, including those expected to deliver significant infrastructure and affordable housing, the evidence base cannot demonstrate that the proposed rates will support, rather than frustrate, the delivery of the spatial strategy.
209887	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209913	Trinity College, Cambridge (Emma Woods) [132073]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent supports in principle the introduction of CIL. Greater Cambridge is experiencing, and will continue to experience, substantial growth pressure, and a transparent levy mechanism can provide greater certainty for developers, infrastructure providers and the wider community. The respondent recognises the Councils' need to identify and secure infrastructure funding to support growth. However, support is expressly conditional on the charging schedule being built on a complete, accurate and up-to-date evidence base that properly reflects the full range of development typologies present in Greater Cambridge; including, critically, specialist research and development buildings of the kind that underpin the area's economy. The respondent does not consider that the current evidence base meets this standard in its present form. Nor does the charging schedule afford

					strategic sites with the flexibility often needed to facilitate their delivery.
209796	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent notes that the Viability Assessment expresses an ambition to increase developer contributions towards strategic infrastructure through CIL, which has previously relied upon Section 106 contributions alone. It is stated that Section 106 Agreements will continue to be deployed to meet community and on-site infrastructure requirements, with CIL collected primarily for strategic infrastructure. While the ambition to deliver a greater level of contribution towards strategic infrastructure and to pool contributions is welcomed, the respondent is cautious that CIL can both collect the contributions and deliver the infrastructure in a timely manner to support delivery of Super Strategic Sites with capacity for 2,000 or more homes. Furthermore, there is a significant risk that diverting direct and specific contributions from Super Strategic Sites into CIL will frustrate delivery, impact the quality of development, reduce provision of affordable housing and cause delay.
209929	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent has no in-principal objection to the proposed introduction of CIL, which can operate effectively as a mechanism for collecting developer contributions in order to fund delivery of infrastructure. It is appreciated that the Greater Cambridge area faces considerable challenges associated with delivery of infrastructure to support both planned growth and the Government's aspirations for enhanced levels of growth to underpin continued success of its world-renowned economy, in which context CIL could clearly play a valid role. The respondents interests relate primarily to ensuring that introduction of CIL would aid delivery of strategic infrastructure in the area, including that which would support development of largescale strategic sites, such as that at Waterbeach new town, rather than (and specifically avoiding) delaying or prejudicing delivery, with particular regard to viability considerations. It is considered that

					strategic sites should be explicitly nil-rated for the reasons set out in response to subsequent questions.
209962	Wellcome Genome Campus Ltd [131984]	David Lock Associates (Helen Pearson-Flett, Senior Associate) [9604]	Question 3: Do you agree that the Council should introduce CIL?	Object	The respondent considers that CIL should not be introduced. The respondent is fully aligned with the ambition for growth and as a key stakeholder and potential investor, feels passionately about seeing the full potential of Greater Cambridge realised. The challenges to growth, not least the constraints of proper strategic transport infrastructure and the potential value of CIL as a possible mechanism to fund strategic infrastructure are understood. However there is concern about the impact of CIL on the deliverability and viability of development. The current economic climate is challenging, and commercial development in particular is sensitive to economic cycles and changes in demand, competition, rents, yields, debt availability, land and other costs. Having a CIL charge (at the proposed rate), in uncertain conditions could have the effect of constraining development altogether. Further, CIL rates cannot be easily reviewed – a full examination process is generally required and so a CIL charge is absolute, it provides little opportunity to be responsive to challenges and changes in the economy / market. To the contrary, Outline Permissions with a s106, whilst legally binding, have mechanisms that enable review in exceptional circumstances. Even if CIL does not have this damaging effect, the mechanics are such that it will not contribute meaningfully to support wider growth. Receipts from emerging site allocations will only arrive at some distant time into the future. Thus, relying on CIL to deliver strategic infrastructure projects required now, is challenging, with little control over obtaining the funding and limited ability to forward plan for such infrastructure projects.
209782	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner,	Question 3: Do you agree that the Council should introduce CIL?	Comment	The respondent recognises CIL as a potential important source of funding for infrastructure that could support wider development in Greater Cambridge. The respondent does not oppose the principle of a draft CIL charging schedule for

		Planning) [130582]			Greater Cambridge but seeks to ensure it is well timed, necessary and that reasonable rates are proposed, to ensure CIL rates do not risk the viability and delivery of development.
209600	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes
209774	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209687	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209591	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes
209872	Brockton Everlast c/o	Bidwells (Miss Charlotte Tate,	Question 4: Do you agree that the	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy

	Bidwells [132069]	Principal Planner) [131107]	Council has demonstrated a funding gap?		does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209666	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes. Cambridge Area Bus Users agrees that the Council has demonstrated a funding gap, however the consultation vastly underestimates its size.
209790	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent notes 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.
209671	Cambridge Living Streets (Linda Jones) [132081]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Cambridge Living Streets agrees that the City Council has demonstrated that a funding gap exists in delivering "strategic transport infrastructure".
209831	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that whilst the Councils may have demonstrated a funding gap in relation to their respective existing local plans, the proposed Greater Cambridge CIL is based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater

					Cambridge. The respondent considers that if CIL is to be adopted by the Councils, it should be done so in conjunction with, or following the adoption of the Greater Cambridge Local Plan, so that infrastructure funding and in-kind provision can be aligned with the charging and spending of CIL. Clearly, the GCLP will have a significant impact on the funding and delivery of infrastructure within Greater Cambridge. Furthermore, it is acknowledged that there are budgetary pressures within the Councils at present, which is not helped by external factors including considerable high inflation within the construction industry. However, the Councils should consider the effects that the Cambridge Growth Company ("CGC") and the proposed Greater Cambridge Development Corporation ("GCDC") will have on funding for, and delivery of, strategic transport infrastructure. As it stands, there is little recognition of the anticipated support from these bodies in delivering strategic transport projects, despite them being a significant part of the development context in Greater Cambridge. Whilst it is acknowledged that funding from the CGC is as yet uncommitted, it is anticipated to be so shortly. By postponing the adoption of CIL Charging Schedules, the Infrastructure Statement would be able to consider the significant effects that this funding will have for the Councils.
209609	Dr Alan Lawrence [131259]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	Yes, but it significantly underestimates the funding gap. The Greater Cambridge Infrastructure Statement indicates a large funding gap of £275 million but this is an underestimate as it includes only current GCP projects, not the other projects considered desirable and/or necessary by Cambridgeshire County Council and the CPCA (for example, bus franchising / the Bus Strategy)
209581	Edward Leigh [132083]		Question 4: Do you agree that the Council has	Support	Yes

			demonstrated a funding gap?		
209903	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent considers that the Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor's Transport Strategy, or potential borrowing against future CIL receipts will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.
209640	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes The pausing of major transport projects across Greater Cambridge demonstrates a significant gap between infrastructure need and available funding. It also indicates that several infrastructure needs affecting established communities, including Girton, have not been fully identified or costed in existing plans. For Girton this gap is visible in: • deteriorating pavements, verges and drainage systems • ageing recreation and community facilities requiring renewal • increased movement and safety pressures from Eddington, Darwin Green and North West Cambridge • active-travel needs along routes linking Girton, Histon and Oakington • unfunded responsibilities arising from the Girton-parish section of Darwin Green

					CIL is one of the only mechanisms capable of addressing this shortfall for established villages.
209935	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that the magnitude of and funding streams to fill the funding gap are unclear. Contemporary reports (Reg 18 Greater Cambridge Local Plan Infrastructure Delivery Plan October 2025 and CIL Infrastructure Statement January 2026) appear to set out different funding gaps. In terms of funding streams clarity is needed on what is an appropriate S.106 sum to be accounted for in the funding gap. The Chancellor announced on 17 March 2026 additional funding (£800M) for Oxford- Cambridge corridor. How does this impact on the funding gap and therefore the appropriateness of CIL charging rates?
209634	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes
209767	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent considers that the Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor's Transport Strategy, or potential borrowing against future CIL receipts will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.
209921	Henry Boot Developments	Twenty5 Planning Ltd	Question 4: Do you agree that the	Comment	The supporting documentation identifies that there is a funding gap but clarity is sought about all the funding streams

	Limited [131707]	(Ms Lydia Voyias) [131260]	Council has demonstrated a funding gap?		Greater Cambridge is receiving, including as part of the 'City Deal' and part of the 'Greater Cambridge Oxford to Cambridge corridor' in which the Government recently announced £800 million ¹ . Further, a funding gap should not act as wider brake on development, that would potentially become unviable.
209825	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that whilst the Councils may have demonstrated a funding gap in relation to their respective existing local plans, the proposed Greater Cambridge CIL is based on evidence and policy that is out-of-date and/or irrelevant to the development landscape within Greater Cambridge. The respondent considers that if CIL is to be adopted by the Councils, it should be done so in conjunction with, or following the adoption of the Greater Cambridge Local Plan, so that infrastructure funding and in-kind provision can be aligned with the charging and spending of CIL. For example, the Infrastructure Statement mentions the expected cost of Whittlesford Parkway improvement and expansion but does not mention the draft policy allocation which is anticipated to deliver a significant amount of the identified infrastructure directly through development proposals should landowner proposals be forthcoming. Similarly, the Infrastructure Statement references the costs associated with delivering Cambridge South East Transport but does not reference the role that proposed policy allocation at Grange Farm will have in delivering and extending it. Nor does it make reference to the expansion of Babraham Research Campus or the Cambridge Biomedical Campus. Furthermore, it is acknowledged that there are budgetary pressures within the Councils at present, which is not helped by external factors including considerable high inflation within the construction industry. However, the Councils should consider the effects that the Cambridge Growth Company ("CGC") and the proposed Greater Cambridge Development Corporation ("GCDC") will have on funding for, and delivery of, strategic

					transport infrastructure. As it stands, there is little recognition of the anticipated support from these bodies in delivering strategic transport projects, despite them being a significant part of the development context in Greater Cambridge. Whilst it is acknowledged that funding from the CGC is as yet uncommitted, it is anticipated to be so shortly. By postponing the adoption of CIL Charging Schedules, the Infrastructure Statement would be able to consider the significant effects that this funding will have for the Councils.
209626	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes. The pausing of several major transport projects demonstrates the seriousness of the current infrastructure funding gap. This also highlights that significant infrastructure requirements for established parishes are not fully addressed in current strategic plans. The gap is evident in deteriorating pavements, verges and drainage systems; pressure on crossings and active-travel routes; ageing recreation and community facilities; and facility demand created by residents of Darwin Green, North West Cambridge and surrounding parishes. CIL is one of the few mechanisms available to help address this gap for established communities.
209616	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that the CIL regulations state that local authorities should take account of other sources of available funding for infrastructure when setting CIL rates. This includes funding from other sources such as The Chancellor announced on 17 March 2026 that she was set to double funding for Oxford–Cambridge corridor in move to make it UK’s “Silicon Valley” should be factored in. It is questioned whether this has been accounted for in identifying the gap.

209943	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent does not agree that the Council has demonstrated a funding gap. While the consultation materials suggest the presence of a general infrastructure funding gap, the Council has not demonstrated a clear, quantified, or justified funding gap that warrants imposing CIL on employment/logistics sites such as those along the A14. The respondent considers that the consultation does not adequately demonstrate a funding gap because No quantified shortfall is shown for the strategic transport infrastructure CIL is intended to fund, The viability evidence is insufficiently transparent or detailed No cumulative A14 corridor infrastructure assessment is presented, Funding needs appear to be generalised rather than linked to specific development typologies. The respondent considers that the scale of the funding gap does not justify imposing CIL on employment sites because A funding gap is normal — not a justification for indiscriminate charging, Employment sites already fund significant infrastructure via S106, CIL risks undermining the Council's own employment strategy. The respondent considers that the funding gap case is particularly weak for A14 industrial / logistics sites because Such sites already face high infrastructure costs, The A14 corridor lacks cumulative transport modelling, A14 industrial / logistics sites support strategic economic functions.
209808	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.

209848	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent acknowledges that Greater Cambridge has identified an alleged funding gap in relation to its respective existing local plans, however, this is based on evidence and policy that is now over a decade old. 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. 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.
209896	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent considers that the Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor's Transport Strategy, or potential borrowing against future CIL receipts will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.

209957	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent notes that the Chancellor has announced £500m of funding to Greater Cambridge and would query whether that has been accounted for in this exercise. Also, the GCP Draft Budget for 2025/26 shows that £809m is required to deliver the projects. It shows funding of £810m, including a 'local contribution' including circa £27m from New Homes Bonus and £230m assumed Section 106 income. We would query why the full assumed Section 106 obligations sum (£230m) has not been accounted for in arriving at the funding gap.
209653	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	We note that the Chancellor has announced £500m of funding to Greater Cambridge and would query whether that has been accounted for in this exercise. Also, the GCP Draft Budget for 2025/26 shows that £809m is required to deliver the projects. It shows funding of £810m, including a 'local contribution' including circa £27m from New Homes Bonus and £230m assumed Section 106 income. We would query why the full assumed Section 106 obligations sum (£230m) has not been accounted for in arriving at the funding gap.
209818	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209880	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The

					transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209838	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent understands that there is a significant strategic transport infrastructure funding gap associated with the GCP programme and that substantial investment will be required to deliver the transport interventions needed to support growth in Greater Cambridge. However, while the existence of the gap is not in question, the explanation of how the current shortfall has been derived remains unclear, particularly in relation to earlier City Deal assumptions about anticipated developer contributions. Greater clarity on how the shortfall has been calculated, and how CIL fits alongside other funding sources, would help provide confidence in the proposed approach. It would also be useful to set out more clearly how CIL income is expected to interact with other funding sources, whether a gap is still likely to remain once CIL is introduced, and how decisions will be made and infrastructure sequencing decided if funding falls short of expectations. Clear and transparent reporting on how CIL funds are collected, allocated and spent, including any unspent balances, will be important to maintain confidence that the money is being used effectively and in a timely way.
209888	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. KMC has undertaken a review of this statement and its full review is appended. Its conclusion finds there are key shortcomings in the current CIL consultation as follows: • There needs to be a 'Golden thread' running through the evidence, need and impact to justify implementation of CIL and this is not supported by the evidence base presented

					• The overall package on which the CIL is predicated (TSCSC and City Deal) has not been adequately tested to demonstrate the need for the schemes and the relationship with the development strategy • The original package in the TSCSC and the City Deal transport programme has changed significantly over time, so the link between schemes and development has been further eroded • The CIL will not raise a transformational amount of funding and will not significantly change overall scheme delivery
209914	Trinity College, Cambridge (Emma Woods) [132073]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent partially agrees that the Council has demonstrated a funding gap but states that the funding gap analysis does not adequately account for strategic site complexity. The respondent acknowledges that the Greater Cambridge Infrastructure Statement sets out a range of infrastructure requirements to support planned growth, and that there is a legitimate case for infrastructure investment to be levied from development. However, there is a fundamental concern about the point at which this CIL is being introduced. Whilst being a comprehensive document, the TSCSC was not tested and modelled systematically in the way that would now be expected in the preparation of an Infrastructure Delivery Plan (IDP) to support a new Local Plan. Of the schemes still to be delivered by the GCP, there is not a clear and evidenced link between them and the developments in the Local Plans. Of the big transformational public transport schemes, the Cambourne to Cambridge (C2C) is fully funded, Cambridge South East Transport (CSET) is costed at £160m and in advance of the TWAO inquiry commencing in September 2026 (ahead of CIL implementation) will need to be demonstrated that funding is available. The Waterbeach to Cambridge Busway and Eastern Gateway schemes are already expected to be significantly funded by s106. CIL is

					not, therefore, expected to benefit these schemes. The timing of the current CIL proposal is both too late and too early. It is too late given the current Local Plans, and their associated evidence base are expected to be superseded within a year of implementation – to be effective, it should have been developed concurrent with the adoption of the two Local Plans in 2018.
209380	Trumpington Residents Association (Mr David Plank) [130334]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Support	Yes, we do agree.
209797	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 4: Do you agree that the Council has demonstrated a funding gap?	Comment	The respondent comments that while there is clearly a funding gap, it has significant concerns about whether the gap as presented is the right basis upon which to introduce CIL at this time. The CIL charging schedule is being brought forward in advance of the Greater Cambridge Local Plan ('GCLP'), which is being prepared simultaneously and which will have a material effect on both the infrastructure requirements and the funding sources available to meet them. The Infrastructure Statement ('IS') and CIL Supporting Statement are calibrated against adopted local plans with a horizon of 2031, yet the Viability Report has been assessed against the emerging draft GCLP. This creates a fundamental internal inconsistency in the evidence base: infrastructure requirements are assessed against one policy context; viability is tested against another. The IS contains no substantive recognition of the anticipated support from the Cambridge Growth Company ('CGC') or the proposed Greater Cambridge Development Corporation ('GCDC') in delivering strategic transport infrastructure. These bodies represent a significant and proximate source of infrastructure funding that, once committed, could materially alter the scale of the funding gap that CIL is being asked to fill. Proceeding with a charging schedule before this funding position is

					confirmed risks overstating the gap and setting rates at a level that is inconsistent with the development landscape that will actually prevail.
209783	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Question 4: Do you agree that the Council has demonstrated a funding gap?	Object	The respondent comments that, while the Infrastructure Statement quantifies the funding requirements, the strategy does not provide a clear justification for the specific projects identified. The infrastructure schedule is underpinned by evidence that is materially out of date and insufficiently robust for the purposes of setting a Charging Schedule. The transport context, costs and deliverability have changed significantly since 2014, and this must be reflected in up-to-date, plan-led evidence that meets the CIL requirement of using 'appropriate available evidence'.
209601	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Axis is concerned about a number of the inputs and assumptions within the BNP Paribas CIL Viability Assessment which has informed the proposed rates as follows: • Benchmark Land Values – the viability assessment applies a BLV of circa £150,000 per gross acre for smaller sites, which may not meet landowner expectations. We would expect BNP Paribas to test a range of say £150,000-£200,000 per gross acre for smaller sites. • Affordable housing values – The capital values which are adopted for the affordable housing tenures are not clear within the report. These need to be set out please, as the blended capital value for affordable rent of £293psf is considered to be too high, especially when it is compared to the private values. With private values at £372psf, the affordable rent would be close to 80% of private values. • External works – although base build costs appear to be reasonable, the application of 10% external works for flats and 15% for houses on base build costs is low in the current

					market and would not account for any site abnormal development costs, such as earthworks, piling, significant utilities requirement etc. We would suggest that external works are set at a minimum of 20% for all types of housing. • Professional fees – 7% has been applied in all scenarios, which appears to be a little light and should be at least 8%-10% for schemes of a few hundred homes, in order to take account of planning costs and fees. • Biodiversity Net Gain – the costs of BNG can vary significantly depending on the land available on-site and the nature of ecology to enhance. 1.4% of base build costs may not be a sufficient sum, especially if off-site credits are required to deliver 20% net gain in biodiversity. According to Biodiversity Units UK, credits in the south of England range from circa £25,000 to £203,000 per credit. • Sales Rate – The report needs to clarify whether the sales rate of 6 sales per month is for all tenures, or just private units. It should be the case that no more than 3 private sales per month per outlet is applied to the appraisals. • Developer's profit – A profit margin of 17.50% on GDV for private residential is inadequate and this should be a minimum of 20% on GDV. With the affordable at 6% affordable, this would still be circa 17.50% on GDV as a whole, which is in the middle of the PPG range for profit in relation to viability assessments.
209775	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the viability evidence is fundamentally inaccurate and has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them. comments that the modelling does not reflect real market conditions, and the assumptions used, particularly around

					costs, values, developer margins and infrastructure requirements. The assumptions bear little resemblance to the realities of development delivery in the area. Moreover, the cost assumptions within the appraisal are materially inaccurate. comments that the land values, construction costs and design expectations in Cambridge are considerably higher than those assumed in the analysis, resulting in the unrealistic conclusion that development can absorb larger CIL payments than is actually feasible.
209688	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the viability evidence is fundamentally inaccurate and has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them. States that the modelling does not reflect real market conditions, and the assumptions used, particularly around costs, values, developer margins and infrastructure requirements. The assumptions bear little resemblance to the realities of development delivery in the area. Moreover, the cost assumptions within the appraisal are materially inaccurate. States that the land values, construction costs and design expectations in Cambridge are considerably higher than those assumed in the analysis, resulting in the unrealistic conclusion that development can absorb larger CIL payments than is actually feasible.
209592	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Bloor is concerned about a number of the inputs and assumptions within the BNP Paribas CIL Viability Assessment which has informed the proposed rates as follows: • Benchmark Land Values – the viability assessment applies a BLV of circa £150,000 per gross acre for smaller sites, which may not meet landowner expectations. We would expect BNP Paribas to test a range of say £150,000-£200,000 per gross acre for smaller sites.

				• Affordable housing values – The capital values which are adopted for the affordable housing tenures are not clear within the report. These need to be set out please, as the blended capital value for affordable rent of £293psf is considered to be too high, especially when it is compared to the private values. With private values at £372psf, the affordable rent would be close to 80% of private values. • External works – although base build costs appear to be reasonable, the application of 10% external works for flats and 15% for houses on base build costs is low in the current market and would not account for any site abnormal development costs, such as earthworks, piling, significant utilities requirement etc. We would suggest that external works are set at a minimum of 20% for all types of housing. • Professional fees – 7% has been applied in all scenarios, which appears to be a little light and should be at least 8%-10% for schemes of a few hundred homes, in order to take account of planning costs and fees. • Biodiversity Net Gain – the costs of BNG can vary significantly depending on the land available on-site and the nature of ecology to enhance. 1.4% of base build costs may not be a sufficient sum, especially if off-site credits are required to deliver 20% net gain in biodiversity. According to Biodiversity Units UK, credits in the south of England range from circa £25,000 to £203,000 per credit. • Sales Rate – The report needs to clarify whether the sales rate of 6 sales per month is for all tenures, or just private units. It should be the case that no more than 3 private sales per month per outlet is applied to the appraisals. • Developer's profit – A profit margin of 17.50% on GDV for

					private residential is inadequate and this should be a minimum of 20% on GDV. With the affordable at 6% affordable, this would still be circa 17.50% on GDV as a whole, which is in the middle of the PPG range for profit in relation to viability assessments.
209845	British Land (David Bloy, Planning Director) [132085]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that while their masterplan at South Trumpington is still in the early stages of preparation and they have not yet been able to fully evaluate the impact of the draft CIL on the overall viability of the scheme, they do have concerns regarding the assumptions used in the BNP viability assessment. Several of the key inputs do not reflect established industry practice, which in the view of the respondent has led to an overstatement of viability headroom that could produce CIL rates that may not be achievable across Greater Cambridge.
209873	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to

					sustain high design standards that are expected and public benefits such as affordable housing.
209667	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	No. Cambridge Area Bus Users does not consider that appropriate evidence has been used to inform the value given for the proposed infrastructure funding gap. Whilst the Council has demonstrated a funding gap, its size is greatly underestimated. The consultation indicates a funding gap of £275 million, however this is only the gap relating to the Greater Cambridge Partnership's current projects. The consultation therefore doesn't take into account the sums required to bring about the additional projects Cambridgeshire County Council considers desirable to support the existing Local Plans for Cambridge and South Cambridgeshire. It also doesn't put a value on the funding required to fulfil Cambridgeshire and Peterborough Combined Authority's Bus Strategy and Bus Service Improvement plan in Greater Cambridge. The transport infrastructure necessary to ensure the viability of developments in the forthcoming Greater Cambridge Local Plan will undoubtedly increase the funding gap yet further in the future.
209791	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent notes that the viability assessment indicates 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.
209854	Cambridge University Hospitals NHS Foundation		Question 5: Do you agree that the Council has used appropriate	Comment	The respondent comments that the viability report makes reference to the fact that rental growth office and R&D space has slowed recently due to increased supply and that it is unclear how this slowing down has been reflected in the

	Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		evidence to inform the proposed rates?		proposed rates. The respondent comments that it is particularly important that the rate set for Offices and R&D does not disincentivise these types of developments coming forward in a timely manner. Transport contributions are generally the main (/only) infrastructure contribution required, and made, by these types of development. Unlike with other types of development where there may be S.106 obligations including affordable housing where a site specific viability assessment can ensure that the development is viable, a non-negotiable levy for Office / R&D leaves no opportunity for negotiation to ensure that these types of developments will continue to make their necessary contribution to the growth of the Greater Cambridge economy.
209832	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent comments that the Viability Review has been conducted in relation to the emerging GCLP, whilst the remainder of the supporting documents are silent on it in relation to infrastructure requirements. Therefore, there is a fundamental misalignment and inconsistency between the infrastructure that the CIL seeks to fund and the assumptions upon which it is viability tested. On this basis, the Councils have not used appropriate evidence to inform the proposed rates. The Draft Charging Schedules fail to consider different development typologies within Greater Cambridge, not least: 1 the role of large-scale strategic sites, whether Office, R&D, or Residential, in delivering infrastructure in-kind; and 2 the commercial differences between the delivery of Offices versus R&D, including sub-divisions within these development types. Currently, the draft Charging Schedules fail to recognise how different types and scales of development contribute to and deliver infrastructure. In particular, the Councils appear not to have considered whether CIL may not be appropriate for

					large scale strategic development which delivers a significant amount of infrastructure in-kind. The comparison with OCC's approach to CIL for Offices and R&D is noted. However, we remind the Councils that the charging schedule referred to only applies to OCC, which is predominantly urban, rather than the wider Oxfordshire area. Therefore, it is not appropriate to directly compare OCC's CIL with the draft charging schedules, which are intended to apply across the whole of Greater Cambridge. Indeed, viability testing underpinning the South Oxfordshire District Council CIL charging schedule (covering some of the hinterland around Oxford) demonstrated that neither office nor industrial development would have been viable with a CIL imposed.
209582	Edward Leigh [132083]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	Emphatically, no. The calculation of transport funding need is based largely on the GCP's budget shortfall. The GCP's programme is based on the Transport Strategy for Cambridge and South Cambridgeshire which was adopted in March 2014 (twelve years ago). That is before the local councils declared climate emergencies. National policies around transport have evolved significantly, in particular since the creation of Active Travel England. Therefore, a transport strategy and plan from 2014 is out of date and, at best, an incomplete basis for determining the transport needs of the region in future years. The GCP programme is in no sense comprehensive. There are hundreds of small-scale schemes needed around the Greater Cambridge region to create safer active travel connections into Cambridge, to local schools, employment centres, and other destinations. Similarly, there are hundreds of opportunities to improve bus journey speeds and reliability through targeted interventions in the road network. The GCP programme does not include a wholesale upgrade to the quality of bus services to provide a practical and attractive alternative to driving. Funding these improvements

				from Section 106 is challenging because the cost is typically a multiple of approx £1m, which funds one bus for five years. There are also wider benefits to improving a bus service which, if deducted from the S106 contribution, leave a shortfall that is difficult to fill. If there isn't another development being built out on a similar time frame that can benefit from enhancement of the same service, the shortfall would have to be met from scarce council revenue funding or investment by a typically risk-averse bus service operator. There is also a huge gap in the GCP programme – the City Access Project. All planned projects depend on releasing road capacity for buses, walking and cycling in Cambridge city. Proposals to achieve this (with more bus gates or congestion charging) have all been rejected by councillors and no proposal is currently on the tables. Investment is needed, for instance, to redirect traffic flows, redesign bus routes, relocate bus stops and taxi ranks, build more segregated cycling infrastructure, increase the frequency and operating hours of bus services, and install and manage an advanced traffic management system. The City Access Project isn't even mentioned in the Infrastructure Statement and the associated requirements are not costed. Even if the GCP programme is the best available evidence of required infrastructure, project costs are significantly understated. There is an error of fact of the Infrastructure Statement on page 28. The cost of constructing the CSET busway, according to the Estimate of Costs (January 2025) submitted to the public inquiry is £161m. The budget held by GCP of £23.3m is additional. It includes over £20m already spent on this project and future costs of the public inquiry. The total project cost is therefore at least £184m, not £160m as stated.

					Other budgeted costs have not been updated to account for construction inflation, and therefore understate the funding requirement. For instance, the budget for the Waterbeach busway has been £109.4m since September 2023. Correct figures and applying an inflation adjustment factor to current and paused proposals would most likely yield a total delivery cost closer to £1bn in 2026 prices, and therefore a funding gap closer to £400m rather than £272.5m stated. CIL income, estimated at £50m over the plan period, will proportionately make an even smaller dent in the shortfall.
209904	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent highlights that in viability testing, typologies should reflect the types of development proposed in the Local Plan to ensure that the proposed CIL rates are grounded in the actual economics of local development. To meet the requirements of CIL Examination, the rates must not undermine the deliverability of the Local Plan. This necessitates viability testing on allocated sites expected to come forward, ensuring that housing targets remain achievable once the CIL is applied. In line with the PPG, viability assessments should give particular consideration to strategic sites, especially those essential to delivering the plan's objectives. This includes large-scale developments, sites that enable or unlock adjacent development, and those located within priority regeneration areas. The respondent is concerned that the assumptions on rents and yields for office/R&D and industrial /warehousing floorspace are not differentiated by location. Cambridge functions as a two-tier market in which commercial values vary significantly between prime city-centre locations and secondary or peripheral areas. Without such differentiation, the assessment risks applying city-centre value assumptions to locations where they are not achievable, potentially leading to an overestimation of development viability and, consequently,

					CIL rates that do not reflect the realities of the Cambridge office and industrial markets.
209641	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes Yes, broadly — but with important caveats. Girton Parish Council accepts that the viability evidence follows established national guidance and uses appropriate methods, including typology testing and residual land value analysis. This is broadly suitable for setting indicative CIL rates at a strategic level. However, the Parish Council recognises several limitations: • The assessment is high-level and cannot capture the specific constraints and infrastructure pressures faced by established parishes such as Girton. • The results are highly sensitive to assumptions around build costs, sales values and developer returns, all of which remain uncertain. • Edge-of-city parishes impacted by major developments (Girton, Histon and Oakington) may experience different viability dynamics from those assumed in the model. • In some cases, higher CIL could lead to pressure on affordable housing, creating tension between competing planning priorities. On balance, the evidence is adequate for consultation, but its limitations must be recognised in implementation. Flexibility and monitoring will be essential.
209936	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The respondent is not convinced appropriate evidence (i.e. typologies tested, rentals, build costs, utilities, fees) has been used and tested by BNP – particularly in regard to proposing a single catch all CIL rate across Greater Cambridge of £175 psm for offices and R&D space, which could threaten the viability of R&D and indeed mid tech uses which are supported by the emerging GCLP and the aspirations of

					Government. The respondent is concerned about the viability of larger sites which often require very significant infrastructure, and where cash flow is a significant issue for a master developer. Development costs and reductions in delivery trajectories are exerting real pressure on all development. In such context the respondent would be concerned that any CIL required on strategic sites could add to the cash flow burden and mean that developers are forced to seek reductions in affordable housing, an unintended consequence of raising a CIL on such developments. respondent therefore suggest that the Council reconsiders its single residential CIL rate across the whole area and specifically considers nil rating larger strategic sites.
209635	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The CHA believes that the contribution from new development should be a function of its incremental impact on infrastructure rather than the ability of a particular type of development to pay. It would be wrong for a use that has a massive demand on Community Infrastructure should be enabled because its poor financial viability resulted in it having a low CIL contribution rate. It is also unclear why Offices and R&D should contribute at the rate of £175 per sqm when Hotels, Shops, restaurants and financial and professional services contribute at the rate of £50 per sqm. Many financial and professional services businesses operate in offices. So there is ambiguity over what rate to charge for development that could be an office used by financial or professional services (i.e. CIL rate of £50) or an office not used by financial or professional services (i.e. a CIL rate of £175). The CHA would argue that a more level playing field should be established between uses that have similar demands on Community Infrastructure. To this end the large variation in rates across uses with similar infrastructure demand characteristics should be reduced by increasing the rate on hotels, shops and restaurants. The rate for Financial and professional services should be revisited and possibly

					incorporated within Office and R&D and the CIL rate reduced to come closer to the increased rate for hotels, shops and restaurants.
209768	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent highlights that in viability testing, typologies should reflect the types of development proposed in the Local Plan to ensure that the proposed CIL rates are grounded in the actual economics of local development. To meet the requirements of CIL Examination, the rates must not undermine the deliverability of the Local Plan. This necessitates viability testing on allocated sites expected to come forward, ensuring that housing targets remain achievable once the CIL is applied. In line with the PPG, viability assessments should give particular consideration to strategic sites, especially those essential to delivering the plan's objectives. This includes large-scale developments, sites that enable or unlock adjacent development, and those located within priority regeneration areas. The respondent is concerned that there is no clear rationale underpinning the selection or sequencing of the residential typologies. In the absence of testing on actual strategic sites, the respondent would expect the typology framework to include incremental steps that reflect the typical scale and form of development coming forward in Greater Cambridge.
209922	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the Council has not appropriately evidenced the proposed CIL rates. The respondent has serious concerns with the proposed development use categories identified in the Draft Charging Schedule for South Cambridgeshire, especially in respect to employment uses. In respect of employment types, the proposed rates are simply not reflective of the wide range of employment types in the Greater Cambridge market, and it is made worse by the proposed grouping of uses, and the fixed setting of a single tariff across such a large and varied geographical area.

209826	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the Viability Review has been conducted in relation to the emerging GCLP, whilst the remainder of the supporting documents are silent on it in relation to infrastructure requirements. Therefore, there is a fundamental misalignment and inconsistency between the infrastructure that the CIL seeks to fund and the assumptions upon which it is viability tested. On this basis, the Councils have not used appropriate evidence to inform the proposed rates. The respondent does not believe that the CIL Charging Schedules recognise how different types and scales of development contribute to and deliver infrastructure. In particular, the Councils appear not to have considered whether CIL may not be appropriate for large scale strategic residential development. The respondent preferred option is to negotiate obligations for large-scale strategic sites on a case-by-case basis, having regard to the in-kind infrastructure that the development is likely to be delivered. This should be the case on both allocated and unallocated sites, to allow for housing delivery to continue circumstances where delivery on allocations is delayed and/or does not come forwards.
209627	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Support	Yes Yes, broadly — but with important caveats that must be recognised. Histon & Impington Parish Council accepts that the viability evidence appears to follow national guidance, including use of residual land value methodology, typology testing and analysis of local market conditions. The approach taken is broadly appropriate for strategic plan-making and for setting indicative CIL rates. However, we also recognise the limitations raised in the DWP response, which remain important:

					•The viability assessment is deliberately high-level and does not reflect site-specific costs or constraints, particularly in complex village or edge-of-city locations. •The assessment is sensitive to assumptions about sales values, build costs and developer profit margins, all of which remain uncertain in the current economic climate. •In some scenarios, higher CIL could place downward pressure on affordable housing levels, creating a tension between competing policy goals. On balance, the evidence is sufficient for consultation, but must be applied with caution going forward. Implementation should allow for appropriate flexibility, monitoring and responsiveness to changing viability conditions.
209763	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent notes that this charging schedule is being set up primarily to meet the shortfall in funding for proposals set out in the Cambridge and the South Cambridgeshire Local Plans were adopted in 2018 both of which relied on the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) and is largely focused on transport infrastructure. The respondent encourages the council to ensure that the conservation of the historic environment is taken into account when determining the level of the CIL to be imposed, along with the types and locations of development that will be liable, in order to safeguard and encourage appropriate and viable uses for vacant or underused heritage assets. In determining the CIL rates to be put forward in the charging schedule, it is essential that the rates proposed are not likely to discourage schemes being brought forward for the reuse of heritage assets or associated heritage-led regeneration, particularly in areas where there are groups of heritage assets at risk. In such areas, there may be a case for lowering the rates of CIL, possibly through using a finer grained approach to zoning.

209950	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent notes that the proposed CIL Charging Schedule sets out a residential levy rate of £60 per square metre across South Cambridgeshire District and that the Community Infrastructure Levy Viability Assessment supporting the proposed charging schedule is based on a range of development typologies. Of the 48 development typologies tested, three relate to new settlements (22, 25 and 26). The Council must be confident that this sample robustly reflects the characteristics the characteristics of large strategic sites and new settlements such as Northstowe which can typically involve significant upfront infrastructure delivery, long build-out periods, complex phasing arrangements, and substantial Section 106 obligations. These factors place additional financial pressures on development viability that may not be fully reflected in viability testing scenarios.
209617	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the proposed rates do not distinguish between office and R&D uses. In doing so it does not recognise the differences in constructions costs between a standard commercial office building and the various types of R&D. The R&D sector ranging from the growing mid-tech use, such as AvTech to the bespoke R&D spaces which need to make provision for the technical requirements frequently necessary to laboratory and research use. Using a single tariff for the whole of Greater Cambridge does not recognise the marked difference in returns between the centre of Cambridge, edge of Cambridge and South Cambridgeshire district. The assessment does not recognise the likely increased costs as a result of future Local Plan policies. For example, the proposed climate change policies. IWM submitted to the Regulation 18 consultation for the Greater Cambridge Local Plan on this point. It is questioned whether the evidence base is complete.

209944	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The evidence base presented by the Council is not sufficiently robust, detailed, or reflective of the specific viability characteristics of industrial/logistics development or the A14 corridor and therefore does not appropriately justify the proposed CIL rates. The respondent considers the Viability Report lacks sufficient industrial/logistics-specific modelling because It does not model modern logistics development, No recognition of higher infrastructure costs on the A14 corridor, No sensitivity testing for CIL impacts on B2/B8 schemes, The evidence does not justify a departure from established regional CIL practice, The Infrastructure Statement does not link infrastructure costs to B2/B8 development, Evidence does not consider the characteristics of B2/B8 sites along the A14 corridor.
209809	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to

					sustain high design standards that are expected and public benefits such as affordable housing.
209849	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. 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. The respondents believes that this will render the application of any CIL in respect of industrial development in Greater Cambridge to be unviable.

209897	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent highlights that in viability testing, typologies should reflect the types of development proposed in the Local Plan to ensure that the proposed CIL rates are grounded in the actual economics of local development. To meet the requirements of CIL Examination, the rates must not undermine the deliverability of the Local Plan. This necessitates viability testing on allocated sites expected to come forward, ensuring that housing targets remain achievable once the CIL is applied. In line with the PPG, viability assessments should give particular consideration to strategic sites, especially those essential to delivering the plan's objectives. This includes large-scale developments, sites that enable or unlock adjacent development, and those located within priority regeneration areas.
209910	Martin Grant Land and Endurance Estates (Caxton) Ltd [132095]	Savills (Abigail Jones) [132076]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent questions the timing of this CIL consultation and remain concerned that the proposed CIL rates are not based on a sufficiently robust or a stable evidence base. Separate policy and funding programmes for strategic infrastructure may also emerge, reinforcing the need for caution before introducing an additional charging mechanism. The respondent has several concerns that have been identified in the assumptions adopted, many of which are set out in other representations. The respondent is particularly concerned that the methodology does not adequately test strategic-scale development, despite such sites forming a fundamental component of the emerging Local Plan. The use of generic typologies fails to reflect the scale, infrastructure burden, phasing or delivery complexity of sites such as Cambourne North. As a result, the evidence base does not present a realistic understanding of how CIL would interact with viability for the very sites the spatial strategy relies upon. The largest residential-led typology tested comprises 7,335 dwellings, which is materially below the scale of Cambourne North. No typology of an equivalent size or complexity has been tested. Accordingly, the assessment does not represent

					the full spectrum of development required to deliver the Local Plan.
209648	Ms Hannah Brown [9404]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	Second, on that basis, the level of CIL payment to be charged is low, even on the BNP Paribas report, greater sums can be secured, much higher than the £60 imposed without imposing a constraint on viability. Given the urgent need for infrastructure improvements in Cambridge, and a mechanism for greater funding, the rates proposed are too low, with no clear justification for these reduced rates.
209958	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the proposed levy for distribution and logistics sites has not been appropriately tested for the purposes of CIL testing, rendering the CIL charging schedule unsound without further amendment. The viability assessment only considers 3 typologies relevant to industrial use which use a site coverage of 40 and 50%. The respondent observes a greatly reduced site coverage of nearer 25% in respect of the subject sites owing to evolving policy requirements such as BNG alongside physical constraints such as screening, bunding and yard depths, which are not appropriately considered within the viability assessment. The limited typologies are then effectively used to support the proposed CIL charging levy for the district, irrespective of the scale of development being considered, which is inherently inadequate. As a minimum, the viability assessment should be updated to include the consideration of larger strategic sites in order that the full suite of assumptions could be more readily understood and interrogated. Without such level of detail, it is difficult to properly engage with the consultation exercise.
209654	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	These Representations have been commissioned jointly by Newlands (Cambridge) Limited ('Newlands' hereafter) and Tritax Big Box Developments Limited ('Tritax' hereafter) in respect of their land interests at Newlands Park Cambridge (A14 Junction 24) and Tritax Park Cambridge (A14 Junction 25) respectively. Both are experienced developers in bringing

					forward strategic industrial and logistics developments across the country. Both Newlands and Tritax are promoting their proposals through Greater Cambridge's Local Plan process and both signed Planning Performance Agreements (PPAs) with the Council in Summer 2025. They consider the current Local Plan's hostile planning policy approach, that does not support any strategic-scale warehousing in the District, to be out of date in the context of current national planning policy guidance. Similarly, both made detailed Representations to Greater Cambridge's Draft Local Plan (Regulation 18) in January 2026 confirming that retaining that policy stance in the emerging Local Plan is 'unsound' and not in line with the current and emerging National Planning Policy Framework (NPPF). It is within that context that these Representations are made.
209819	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the viability evidence is fundamentally inaccurate and has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them. comments that the modelling does not reflect real market conditions, and the assumptions used, particularly around costs, values, developer margins and infrastructure requirements. The assumptions bear little resemblance to the realities of development delivery in the area. Moreover, the cost assumptions within the appraisal are materially inaccurate. comments that the land values, construction costs and design expectations in Cambridge are considerably higher than those assumed in the analysis, resulting in the unrealistic conclusion that development can absorb larger CIL payments than is actually feasible.
209881	Railpen [132064]	Bidwells (Miss Charlotte Tate,	Question 5: Do you agree that the	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there

		Principal Planner) [131107]	Council has used appropriate evidence to inform the proposed rates?		are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to sustain high design standards that are expected and public benefits such as affordable housing.
209839	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent comments that they have reviewed the CIL VA and has concerns regarding the appropriateness of some of the assumptions that have been adopted. This means that cumulatively, the viability of the various typologies that have been tested and thus their ability to sustain the cost of CIL is being overstated. Whilst the CIL VA analysis includes some stress testing of CIL rates in recognition of potential cost and value fluctuations over the market cycle, in our view, a number of the baseline assumptions remain inappropriately optimistic for a study designated to encompass development viability across a broad geographical area and time period. In our opinion, this therefore compromises the effectiveness of the sensitivity analysis in ensuring that the required viability 'buffers' are accounted for within the proposed CIL rates.

209862	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the Viability Assessment appears to model Purpose Built Student Accommodation using a Gross Development Value (GDV) approach derived from market rents and investment yields. This methodology is inappropriate for college-operated PBSA, which is not a revenue-optimised investment product and is neither valued, financed, nor delivered on a GDV basis. Applying market-based GDVs significantly overstates the viability of college PBSA and leads to an inaccurate conclusion regarding its capacity to absorb CIL. St John's also emphasises that Colleges typically deliver high-quality, sustainable accommodation with substantially higher build costs than those assumed by BNP. In addition, College sites are often tightly constrained in Cambridge, frequently in central locations, within conservation areas, and subject to height and heritage limitations, which further increases construction costs. Most College-delivered PBSA does not generate a development profit, as it is delivered solely to meet operational needs rather than to achieve a commercial return. The respondent has highlighted several points in relation to the viability appraisal and seeks further clarification in regard to the justification for adopting a number of the assumptions included within the Viability Assessment.
209889	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent has undertaken a detailed review of the viability evidence prepared by BNPP and conclude that there are numerous instances where BNPP have been too optimistic in terms of their inputs. Values have been set at the upper end of a range and costs have been set below realistic levels. There is a clear disconnect therefore between the costs of delivering development in Greater Cambridge vs actual realisable values. Evidence to this effect has been set out in this submission. The respondent conclude that at present, the CIL VA is overstating the viability of the typologies assessed, which in turn is overstating the ability to sustain the proposed CIL. Greater Cambridge and BNPP are

					urged to reconsider their position on the viability inputs discussed above, update their modelling using more realistic figures, and reconsider the proposed CIL Charging Rates. If this process is not undertaken it will run the risk of negatively impacting the viability and deliverability of development in Cambridge, which in turn is very likely to have knock-on consequences in respect of the ability of developments to sustain high design standards that are expected and public benefits such as affordable housing.
209915	Trinity College, Cambridge (Emma Woods) [132073]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The viability evidence base is materially incomplete in respect of R&D and laboratory development. The construction cost of a purpose-built R&D or laboratory building is substantially higher than that of a standard commercial office building. This cost differential is not marginal, it is fundamental to the building typology, arising from a range of technical requirements that are inherent to laboratory and research use. Industry cost benchmarking data consistently demonstrates that these requirements translate into a construction cost premium of between c.40% and c.50% above comparable standard office construction. The Viability Report does not appear to fully model the construction cost implications of national, adopted and emerging Local Plan sustainability policies. In particular net zero carbon and water efficiency.
209798	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent comments that the evidence base does not use appropriate evidence to inform the proposed rates, for two principal reasons. First, there is a fundamental disconnect between the IS (calibrated to the adopted local plans) and the Viability Report (tested against the emerging GCLP), meaning that the infrastructure the CIL seeks to fund and the assumptions upon which it is viability-tested do not correspond. Second the evidence base contains no adequate

					assessment of the economics of large-scale strategic residential development.
209804	Vistry Group (Linden Homes) (William Wood, Associate Director - Planning) [132080]		Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the base CIL residential rate of £60 per square metre in itself is not considered excessive. However, it would be beneficial if the final Charging Schedule in the table under the heading statement of compliance were to make explicitly clear that this is to be charged on a “per square metre on the GIA” of the development to reflect paragraph 72 of the CIL NPPG rather than the current wording which simply refers to it as applying on a per square metre basis.
209930	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent considers that the Council has not used appropriate evidence to inform the proposed rates, not least in failing to either adequately assess or reflect the circumstances relating to largescale strategic development sites. It is noted that National Planning Practice Guidance (PPG) supports the setting of differential rates to help ensure that the viability of development is not put at risk. This includes that such provisions could include the setting of low or zero levy rates for strategic sites which have low, very low or zero viability. Subsequent passages of the PPG include reference to setting rates in a manner that does not undermine deliverability of the plan. Waterbeach new town is delivered across two planning permissions both of which secured 30% affordable housing, based on respective viability assessments. The respondent considers that the difficulties of achieving the policy target 40% level, in view of the wide-ranging infrastructure requirements associated with the Waterbeach development, supports a nil rate CIL.
209963	Wellcome Genome Campus Ltd [131984]	David Lock Associates (Helen Pearson-Flett, Senior	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Object	The respondent does not agree that the Council has used appropriate evidence to inform the proposed rates. The respondent has serious concerns regarding the viability report and the evidence on which the proposed rates are based. Comparison is made to Oxford whereby the CIL rate for office / R&D has recently increased substantially from £33 - £168

		Associate) [9604]			per m2. The respondent states that the work they have seen does not provide a robust basis for a new CIL in Greater Cambridgeshire. The evidence base and resultant proposed rates group together offices and R&D. The same rental values, yields and rent free periods are assumed. That is dangerous and wrong. Similarly, the indicative build costs used do not recognise wet labs or other categories of R&D, which have a completely different build cost profile and indeed rental tone to offices. For greenfield sites, the respondent does not recognise the adopted benchmark land values of between £0.25 million and £0.37 million per gross hectare. Further, the nature of the campus type developments for many life sciences schemes around Cambridge, requires a comprehensive approach to placemaking and a multitude of infrastructure requirements aligned with campus and community building. This cannot be compared to an individual office development and none of this has been taken into account. We see no properly evidenced case that R&D should incur the same rate as offices and thus, the rate itself is not appropriately justified. If CIL is implemented across Greater Cambridgeshire, it is essential that proper regard is had to the characteristics of life science campuses, these are bespoke and it is important that the evidence base reflects this.
209784	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?	Comment	The respondent comments that the evidence is fundamentally flawed (sic) and cannot be used to accurately assess the true viability of the proposed CIL rates. The evidence lacks the robustness and market realism required to demonstrate that development across Greater Cambridge can viably sustain the proposed levy. The respondent has significant reservations regarding the basis on which the draft charges have been derived and the assumptions used to support them.

209602	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	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?	Comment	No comment
209776	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.

209659	Barnack Estates Uk Limited (Mr Rob Facer) [132052]		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?	Comment	It is understood the imperative need to provide 'value for money' infrastructure and the intend of CIL (which is a tax) is to contribute to this infrastructure. Construction and development are high risk and can be high reward. The challenges existing in the cost and time to gain planning permission, S106, S279 and affordable housing now CIL being added or increased. Site viability is vital for housing and sustainable employment growth. Growth will only take place in regions that are "Development" friendly. Business rate tax is increasing at various levels from April 2026 by circa 8% to 12%. This is a fixed cost to business, already we are experiencing low demand for industrial units, companies wanting to expand but not able to due to increased cost. As an example, a small 93m2 unit 1000 sq/ft will incur a CIL tax of £3,255. This is equal to £3.25 per sq/ft. If the unit is worth £165 per sq/ft that is 1.9%. This is a very high tax. We believe the solution to delivering infrastructure is to reduce bureaucracy, professional fees, administration and construction/delivery costs rather than put up taxes - Productivity. The burden of all taxes placed upon development will constrain sustainable growth due to cost and poor viability. This in turn will reduce employment, VAT receipts, tax from employment (National Insurance), Income Tax and Corporation Tax. We believe the answer is productivity (better value for money) not more tax.
209689	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially

			on the viability of developments?		constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The representer considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The representer considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209593	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	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?	Comment	No comment
209874	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially

			on the viability of developments?		constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209668	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		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?	Object	No. Cambridge Area Bus Users believes that developers could reasonably be asked to pay higher rates than are set out in the charging schedule. The rate proposed for residential developments in Greater Cambridge – £60 per square metre (/m2) is much lower than those charged by neighbouring planning authorities. Huntingdonshire District Council charges £152/m2. East Cambridgeshire District Council charges £70/m2 in Littleport and Soham, £123/m2 in Ely and £159/m2 in the rest of the district. The proposed rate is also less than half of the rate (£125/m2) which was proposed in 2014 for Cambridge City. The justification for such a low rate – compared to historic Cambridge City proposals and to neighbouring planning authorities – is hard to understand.
209674	Cambridge Living Streets (Linda Jones) [132081]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support	Comment	Cambridge Living Streets understands that the Council needs to strike a balance between the scale of the levy and its acceptance by developers, we do think that the charges should be introduced at a higher level. Hotels and retail charges, in particular, appear to be low yet the disruption caused by these developments/re-developments can be considerable, especially for pedestrians. Pavements get

			development and the potential effect on the viability of developments?		closed, damaged and even broken up and walkers/wheelers travel routes get disrupted.
209855	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		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?	Comment	The respondent comments that it is reliant on its staff, and their access to housing, to deliver their growing services. Median house prices stand at 12.2 times median income in Cambridge and 10.1 times in South Cambridgeshire. The rates set for Residential houses and flats must not risk the delay in delivery of housing, or the quantum of affordable housing in Greater Cambridge. There is real concern that CIL, in addition to the S.106 obligations assumptions (as set out in the Council's evidence) of £25,000 per unit for residential schemes, and £46,000 per unit for major identified strategic site allocations, will impact delivery and the delivery of affordable housing in particular.
209833	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	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?	Object	The respondent comments that the viability review fails to test the significant differences between build costs of R&D development and Office development, applies highly cautious costing assumptions across the board, particularly by failing to account for abnormal costs on some sites, omitting contingency costs altogether, and failing to assess the costs of achieving BREEAM of 'good' or above on non-residential development, does not use accurate assumptions around sales values, nor does it effectively assess the impact of the proposed CIL rates in different areas.
209610	Dr Alan Lawrence [131259]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Comment	No, I believe the level is too low. The Local Plan wants sustainable travel to be a genuine alternative for everyone in greater Cambridge and this will need much more investment. The rate proposed for residential development (£60/sqm) in particular is much lower than in nearby regions e.g. Huntingdonshire or Ely or indeed than was proposed for Cambridge City in 2014 (£125/sqm).

			support development and the potential effect on the viability of developments?		
209583	Edward Leigh [132083]		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?	Object	No. The viability of most sites is determined primarily by the land purchase price. For greenfield sites not in a flood zone, there is usually ample land value uplift to fund all necessary social and transport infrastructure and services, still return a healthy profit to the developer and pay the landowner multiples of the Existing Use Value of the land. The costs of all required infrastructure must be understood at the time the land purchase agreement is struck. Any lack of clarity or changes in policy that require additional funding will inevitably lead to viability assessments and trade-offs, most commonly to the proportion of affordable housing provided. It appears from the Supporting Statement that the LPAs are not being honest with themselves, developers or landowners about what counts as necessary social and transport infrastructure and services that meet agreed or implied objectives on decarbonisation, biodiversity, social equity and inclusion, public health and activity, and managing traffic congestion. Take, for instance, the Grange Farm development. The CSET Busway Extension is estimated to cost £30m. That site is proposed to be allocated for 2,589 homes, meaning that the developer contribution for that single piece of transport infrastructure would be £11,600 per dwelling. CSET itself is unfunded, so this development may be expected to contribute towards the cost of that too (since the extension would be worthless without a mostly congestion-free route for buses into Cambridge). There would also need to be new or significantly enhanced active travel routes to employment

				centres and other destinations along the A11 and A505, which have not been costed. The Supporting Statement says, "Contributions towards County Council infrastructure (education and transport) varies considerably. Whilst many contributions are not required to contribute anything, other developments have paid the equivalent of £10,000 per dwelling." This might explain the shortfall in funding for the new Waterbeach railway station. More generally, it ignores the fact that much transport infrastructure in the region has been paid for by the Government to upgrade the A14 and A428, build Cambridge North and South railway stations, build the Cambridgeshire Guided Busway, and provide most of the funding for the GCP's infrastructure programme. In other words, £10,000 per dwelling historically is wholly inadequate to cover the cost of building new schools as well as the transport infrastructure needed to make large developments sustainable in transport terms. For reference, Hertfordshire County Council collects S106 payments of around £10,000 per dwelling to cover only the cumulative transport impacts of development: https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning/developer-infrastructure-contributions-guide/technical-appendix-1-transport.pdf This is additional to transport infrastructure that is directly needed to make a site sustainable in transport terms (new road and active travel connections to the site and improved bus services).

					It seems clear therefore that Cambridge, South Cambridgeshire and Cambridgeshire are not being anywhere near as ambitious as Hertfordshire about the infrastructure and bus service enhancements needed to support sustainable development or as realistic about the funding required to deliver it. Only costs that are clearly signalled through policies are priced into land transfer agreements. It is therefore essential that Cambridge, South Cambridgeshire and Cambridgeshire set out clear and realistic infrastructure, service and funding requirements in their policies, including CIL. If CIL is to help plug the funding gap (which is far larger than the Infrastructure Statement indicates - see answer to Q5), the LPAs should be proposing CIL rates that rise steeply over the next few years to a realistic long-term level. Delay in introducing the higher rate is justified only to allow recent land deals to proceed to a viable planning permission. Therefore, it is essential that future CIL rates are published now so that they can be priced into future land deals. Annual inflation-based increments will not be sufficient.
209905	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	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?	Comment	The respondent comments that the requirement to strike an appropriate balance cannot be demonstrated while strategic sites remain untested and the Local Plan is still evolving. Without evidence that the proposed rates support the deliverability of the emerging plan's key growth locations, the Councils cannot meet the core requirement of Paragraph 010.

209642	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		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?	Support	Yes Yes, in principle — but with recognised risks. The proposed CIL rates appear proportionate and consistent with national guidance. The distinction between CIL for strategic infrastructure and Section 106 for localised mitigation is appropriate and important for Girton. However, the Parish Council notes the following risks: • The assumption that CIL will be absorbed through reduced land values may not hold true where landowners maintain high expectations. • Higher CIL rates on marginal sites could affect the delivery of affordable housing. • Real-world viability may vary significantly in edge-of-city locations impacted by strategic developments such as Darwin Green and Eddington. • Effective monitoring will be required to ensure the balance remains appropriate as economic conditions change. Girton therefore supports the principle, but emphasises the need for caution, flexibility and a clear approach to viability reassessment where necessary.
209937	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Object	The respondent does not agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments particularly in regard to the high single catch all rate of £175psm proposed for offices and R&D throughout Greater Cambridge. The BNP “Office/R&D” CIL classification could in practice include a wide range of development types, from prime offices in the city centre (use class Egi), out of centre R&D Lab space (use class Egii) and onto mid-tech

			the potential effect on the viability of developments?		developments which can include use classes Egii, B2 and B8 (storage). A single catch all rate of £175psm as proposed to be applied to “offices and R&D” but in practice potentially catching aspects of mid tech, fails to take account of their different typologies, rental profiles and build costs, across what is a very large and diverse geographical area ranging from city centre to rural and brownfield to greenfield.
209636	Cambridge Hoteliers Association Limited (Mr David Chaplin, Chairman) [5309]		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?	Object	No, the impact on viability should be secondary to the impact on infrastructure and yet this latter point has not been quantified in the assessment.
209769	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	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?	Comment	The respondent comments that the requirement to strike an appropriate balance cannot be demonstrated while strategic sites remain untested and the Local Plan is still evolving. Without evidence that the proposed rates support the deliverability of the emerging plan’s key growth locations, the Councils cannot meet the core requirement of Paragraph 010.
209923	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia	Question 6: Do you agree that the Council has struck an appropriate	Object	No, for the detailed reasons set out within these representations, the Council has not appropriately evidenced the proposed CIL rates.

		Voyias) [131260]	balance between additional investment to support development and the potential effect on the viability of developments?		
209827	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	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?	Comment	The respondent comments that there are three fundamental issues with the Viability Review; it applies highly cautious costing assumptions across the board particularly by failing to account for abnormal costs on some sites and omitting contingency costs altogether, it does not effectively assess the impact of the proposed CIL rate in different areas meaning that the proposed tested CIL residential rate does not take into account the significant variation in sales rates throughout Greater Cambridge, the vast majority of residential development within Greater Cambridge would be unviable if 40% affordable housing is pursued in line with the draft GCLP. Corrections to costing assumptions and closer examination of viability against proposed policy requirements are likely to make this worse.
209628	Histon & Impington Parish Council (Yvonne Murray) [132086]		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?	Support	Yes Yes, in principle — but with recognised risks. Histon & Impington Parish Council accepts the logic of striking a balance between viability and infrastructure funding. The proposed rates appear proportionate and recognisably aligned with national guidance. However, limitations identified in the DWP response remain important: • The assumption that CIL costs will be absorbed entirely

				through land value adjustments may not reflect real market behaviour, particularly where landowner expectations remain high. • There is a practical risk that increased CIL burdens could affect the delivery of affordable housing on marginal sites. • Effective implementation will require active monitoring and adjustment as real-world viability conditions change. Alongside these caveats, the Parish Council emphasises the importance of maintaining the distinction between: • CIL for strategic infrastructure investment, and • Section 106 for localised, site-specific impacts. This distinction is essential for parishes like ours that face substantial strategic pressures without corresponding levels of local development.
209618	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	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?	Comment The respondent comments that Greater Cambridge is a large geographical area with a single large urban area which is the primary focus of development to small village settlements within a wider rural area. The proposed levy does not recognise the build costs and rental returns differ for a site in the centre of Cambridge compared to edge of Cambridge or the rural area. It is understood that as in other authorities this could be addressed by using zones to account for location. It appears that the proposed CIL does not recognise the potential additional costs necessary order to comply with development plan policy once the emerging Local Plan is adopted. The draft sustainability policies are highlighted. The viability evidence base has been tested against a construction cost and policy compliance baseline that does not adequately reflect the variation in costs of delivering the

					different typologies of office and R&D buildings in Greater Cambridge.
209945	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	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?	Object	The respondent does not agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments. The proposed CIL approach would place additional cost pressures on development, particularly for employment/logistics sites, and the evidence presented does not fully justify the level of burden proposed for B2/B8 uses. The viability evidence does not sufficiently test B2/B8 development, so the balance cannot be said to be "appropriate".
209810	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by

					reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209850	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	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?	Object	No
209898	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	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?	Comment	The respondent comments that the requirement to strike an appropriate balance cannot be demonstrated while strategic sites remain untested and the Local Plan is still evolving. Without evidence that the proposed rates support the deliverability of the emerging plan's key growth locations, the Councils cannot meet the core requirement of Paragraph 010.
209959	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Object	The respondent does not consider that the proposed rates set out within the draft CIL Charging Schedule achieve a balance between supporting infrastructure and viability. The viability assessment concludes that 'the CIL regulations require charging authorities to strike a balance between achieving its aim of meeting needs for affordable housing with raising funds for infrastructure, and ensuring that developments generate acceptable returns to willing landowners and willing developers. The rates above ensure

			the potential effect on the viability of developments?		that these objectives are balanced appropriately..... this study demonstrates that the proposed CIL charges and the Council's flexible approach to applying policy requirements will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for landowners and developers to achieve reasonable returns in line with the requirements of the NPPF.' In response, it has been established that the proposed CIL Charge is not viable, and there is an alternative established method from which to secure contributions towards infrastructure investment (i.e. Section 106 Agreements). Therefore, the proposed CIL Charge will be an additional levy burden on developments that are already at the margins of viability. Adopting the proposed CIL Charge unamended may serve to reduce developer confidence in Cambridge, and push developments currently on the margins of viability to being unviable. There is a nil CIL rate for all forms of economic development in the wider East of England region i.e. Babergh; Bedford; Chelmsford; East Cambs and Hunts.
209655	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	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?	Object	We do not consider that the proposed rates set out within the draft CIL Charging Schedule achieve a balance between supporting infrastructure and viability. The LPVA concludes that 'the CIL regulations require charging authorities to strike a balance between achieving its aim of meeting needs for affordable housing with raising funds for infrastructure, and ensuring that developments generate acceptable returns to willing landowners and willing developers. The rates above ensure that these objectives are balanced appropriately..... this study demonstrates that the proposed CIL charges and the Council's flexible approach to applying policy requirements will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for

					landowners and developers to achieve reasonable returns in line with the requirements of the NPPF.' In response, it has been established that the proposed CIL Charge is not viable, and there is an alternative established method from which to secure contributions towards infrastructure investment (i.e. Section 106 Agreements). Therefore, the proposed CIL Charge will be an additional levy burden on developments that are already at the margins of viability. Adopting the proposed CIL Charge unamended may serve to reduce developer confidence in Cambridge, and push developments currently on the margins of viability to being unviable. There is a nil CIL rate for all forms of economic development in the wider East of England region i.e. Babergh; Bedford; Chelmsford; East Cambs and Hunts.
209820	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the

					scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209882	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council's own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209840	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Comment	The respondent comments that development across the country in the current economic climate is challenging. In that context, the Councils should seek to adopt a planning framework which incentivises investment and development in Greater Cambridge, especially given the competition for investment from across the country. Achieving the right balance between securing infrastructure funding and

			support development and the potential effect on the viability of developments?		maintaining development viability is challenging. The respondent supports the principle of funding the infrastructure needed to enable growth, but the Planning Authorities should be cautious about adding further cumulative pressures on development to the extent that schemes become unviable and do not come forward. Development in Greater Cambridge is already subject to a wide range of policy requirements, including affordable housing and workspace provision, sustainability standards, biodiversity obligations and Section 106 contributions. While each of these requirements is supported in principle, their combined impact is significant, particularly in the current market where viability is already under pressure. Section 106 should continue to focus on addressing the direct impacts of individual developments, while CIL is intended to contribute towards wider strategic infrastructure. Greater clarity is needed on how the two mechanisms will operate alongside one another in practice, to ensure that there is no overlap or unintended cumulative pressure. The respondent recognises that the proposed levy is largely intended to support transport infrastructure, which is critical to unlocking sustainable and inclusive growth that Cambridge Ahead has long called for. However, further consideration is needed to ensure that the cost of funding that infrastructure does not inadvertently make it harder for development to come forward. Given current market conditions, it will be important to keep the impact of the levy under review once introduced, to ensure it continues to support delivery as intended.
209863	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to	Comment	The respondent comments that the viability assessment prepared by BNP adopts a number of assumptions that do not reflect market reality. Residential sales values at the upper end of the range are unsupported by new-build evidence, while agricultural land values and benchmark land values are based on artificially low inputs that do not align with local market evidence. When realistic EUVs and

			support development and the potential effect on the viability of developments?		appropriate premiums are applied, the majority of typologies would be unable to viably deliver policy-compliant affordable housing. This directly conflicts with the PPG requirement that CIL must not undermine the deliverability of the Local Plan, including its affordable housing policies. Taken together, these issues mean that the Councils have not yet demonstrated that the proposed CIL rates strike the “appropriate balance” required by the Regulations between securing infrastructure funding and ensuring that development remains viable. The evidence does not show that the proposed rates would support the deliverability of the emerging Local Plan, nor does it provide the transparency and robustness required for Examination.
209890	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	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?	Object	The respondent comments that the draft Greater Cambridge Local Plan introduces a suite of new and increasingly demanding policy requirements which impose significant additional viability pressures on development. Development costs in Cambridge are already exceptionally high and expectations around design quality are rigorous. The introduction of further policy requirements could substantially elevate the costs for all forms of development. The imposition of a CIL charge would further erode the ability of sites to meet these ambitious policy demands and would materially constrain the Council’s own ability to deliver the objectives of the emerging Local Plan. The cumulative effect of these policy burdens, coupled with CIL, risks creating a position where schemes simply become unviable. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by

					reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209916	Trinity College, Cambridge (Emma Woods) [132073]		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?	Object	The respondent does not agree that the Council has struck an appropriate balance between additional investment to support development and the potential effect on the viability of developments for R&D and strategic site development. The viability evidence base has been tested against a construction cost and policy compliance baseline that does not adequately reflect the realities of delivering specialist research and laboratory buildings in Greater Cambridge. As a result, the proposed rates risk being set at a level that could constrain delivery of this strategically important sector. In addition, the proposed approach does not adequately recognise the distinct viability challenges associated with large-scale strategic sites. These sites typically carry significant upfront infrastructure costs, long delivery horizons, complex phasing, and substantial planning obligations, all of which place considerable pressure on scheme viability. The application of a uniform CIL charge in these circumstances risks double-counting infrastructure burdens and undermining delivery. The respondent therefore considers that strategic sites (particularly those expected to deliver significant volumes of R&D and laboratory floorspace) should be subject to a nil or materially reduced CIL rate. This approach would better reflect established practice elsewhere and ensure that critical, plan-led growth locations remain deliverable.
209381	Trumpington Residents Association (Mr David Plank) [130334]		Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Support	Yes, we do – and note that BNP Paribas's assessment suggests this balance could still be demonstrated with higher rates in real terms of CIL.

			the potential effect on the viability of developments?		
209799	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		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?	Object	The respondent comments that while that balance may well be struck for much of the development anticipated across Greater Cambridge, the respondent is firmly of the view that there is insufficient consideration of the practicalities or implications of placing the same requirements upon Super Strategic Sites as those that might apply to smaller scale development. The challenges and complexities of funding and delivering Super Strategic Sites are materially different from those of standard residential development. Substantial forward funding for infrastructure and the total burden that arises from needing to create whole communities and fully mitigate the impact of development over the long term means an ongoing balancing of priorities, as viability itself varies and is reviewed across delivery cycles. Delivered across decades and across multiple market cycles, strategic scale development will typically involve explicit or de facto Grampian conditions linked to strategic infrastructure. Development will stop if necessary infrastructure is not in place. Affordable housing becomes the residual variable as other non-negotiable mitigation is defined and delivered. Together with South Cambridgeshire we are very aware of the challenges of commencing and maintaining momentum on such sites.
209931	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 6: Do you agree that the Council has struck an appropriate balance between additional investment to support development and	Comment	The respondents states that, in the case of the respective applications at Waterbeach new town, the Section 106 regime has enabled agreement of suitable infrastructure funding, balanced against affordable housing proportions in the context of viability assessment activities. Both have viability review mechanisms built into the legal agreements that will capture enhancements to either strategic transport or affordable housing provision if an improved viability position is achieved. It also enables timely delivery of infrastructure to be

			the potential effect on the viability of developments?		achieved, control over which is of fundamental importance where Grampian conditions relating to significant infrastructure may be required, as is the case at Waterbeach new town.
209785	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	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?	Object	The respondent comments that in practice, introducing CIL at the levels proposed would force trade offs that directly undermine policy objectives, leading to reductions in sustainability performance, design quality and affordable housing. These impacts would materially prejudice scheme deliverability and, ultimately, reduce the likelihood of much needed development coming forward. The respondent considers that, even if CIL generates £50 million, that this would only marginally reduce the identified funding gap with no credible funding source or delivery mechanism identified to bridge that gap. The respondent considers that, given the scale and cost of the projects listed, £50 million would fund only a small fraction of the identified projects and that it is unclear how the Draft Charging Schedule can be justified by reference to an infrastructure strategy that is neither adequately evidenced nor demonstrably deliverable.
209603	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	No comment
209669	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No. Various bus services in Greater Cambridge (e.g. Route 100 from Waterbeach New Town to central Cambridge) are currently supported by S106 funds. It is not evident whether S106 or the CIL will be used to support the bus services that will be required to enable residents of new developments to have a genuine alternative to car travel from the day they move in. It is also not clear whether the local transport infrastructure

					required for new developments (e.g. new bus shelters, cycle parking) will be supported by CIL or S106 contributions. This needs to be fully considered and set out in publicly-available documents.
209792	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent notes 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. 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. The respondent 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. The respondent 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.
209673	Cambridge Living Streets (Linda Jones) [132081]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	Cambridge Living Streets has concerns about how CIL will operate alongside the Section 106 planning obligations and do not consider that the explanation given is clear enough.
209856	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that the overall approach needs to be made more clear. The respondent acknowledges the statement that "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." and states there are two key points to be made in this regard recognising that it refers to "including"

	Management) [130588]				and is therefore not an exhaustive list. Firstly, in order for the proposed rates and their viability implications to be properly considered, the expected S.106 obligations also need to be clear. The reference to “including” in the Statement does not do this. Noting that transport is not in this list, that the CIL is to fund transport infrastructure, but that the list above is “including”, it needs to be explicit in what circumstances (if any, and it is assumed to be none) transport contributions towards off-site transport infrastructure might be required by condition or S.106 obligation when a CIL Charging Schedule is adopted. It is acknowledged that necessary on-site and site access improvements would be required to be delivered, but explicit recognition that there would be no requirement for off-site transport improvements by condition or S.106 obligation as part of developments is required. Secondly, it should be explicitly recognised that hospitals as well as GP surgeries and other health and care facilities are necessary infrastructure to be funded.
209834	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent does not dispute that the Infrastructure Statement and CIL supporting statement is clear that the funds are intended for the delivery of strategic transport infrastructure, whilst s106 obligations will continue to be used for other infrastructure such as schools, libraries, doctor’s surgeries, sports facilities, community centres, and green infrastructure. However, neither the Infrastructure Statement nor the CIL supporting statement are draft policy and will not be read as such in practice. As such, there is a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations SPD, which has been approved by South Cambridgeshire Council.
209611	Dr Alan Lawrence [131259]		Question 7: Do you agree that it is clear how CIL will operate alongside Section	Comment	No, it is not clear how CIL will operate alongside Section 106 Planning Obligations. It is not clear by which scheme infrastructure for new developments will be funded, or, in particular, bus services.

			106 Planning Obligations?		
209584	Edward Leigh [132083]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No. There needs to be a clear statement of what CIL and S106 will cover. I suggest that, for transport, CIL should pay for mitigating cumulative impacts, and S106 for mitigating direct impacts. It should also be made explicit in Local Plan policy that a development can mitigate its direct and cumulative transport impacts by investing in measures that mode-shifts trips not connected to the development but which release road capacity to accommodate vehicular trips to/from the development. For example, a development should, where appropriate, be required to pay for a new cycle track or an improved local bus service rather than pay to reconfigure or signalise a junction to increase vehicular capacity. This is part of vision-led transport planning, as the NPPF now requires.
209906	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recognises that CIL will be used solely to fund strategic transport infrastructure, with all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. As a result, Section 106 costs will not reduce following the introduction of CIL; instead, CIL will operate as an additional charge on top of existing obligations. This contrasts sharply with the approach taken in Oxford. Oxford City Council's CIL Viability Study applied a Section 106 allowance of just £4,000 per residential unit, reflecting a model where CIL is the primary mechanism for funding infrastructure and Section 106 is tightly limited to site-specific requirements. Other authorities adopting CIL have taken a similar approach, applying modest Section 106 assumptions to avoid double-charging and to ensure that CIL replaces, rather than duplicates, existing obligations. Against this backdrop, the £25,000–£46,000 per-unit Section 106 allowances used in the Greater Cambridge Viability

					Assessment appear unusually high and inconsistent with the stated purpose of CIL. If Section 106 is expected to remain at current levels, and CIL is layered on top to fund transport infrastructure, the combined burden risks exceeding viable levels, particularly for strategic sites that already face substantial infrastructure and policy costs. The respondent recommends that CIL for strategic sites above a certain threshold should be set at a nil rate, with major site-specific infrastructure instead secured through Section 106.
209643	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	Yes Yes, with reservations. While the principles are clear in the documentation, Parish Councils do not yet experience systematic early involvement in Section 106 discussions. A workable system requires a structured golden thread of information so that Girton Parish Council can feed real-time evidence directly into District and County infrastructure planning. This includes parish budgets, capital plans, asset-condition data, drainage, verge and pavement assessments, neighbourhood-plan evidence, safety and accessibility work, open-space and community-facility needs, social-value assessments, active-travel and mobility patterns across Girton, Histon and Oakington, and the local impacts arising from Eddington, North West Cambridge and Darwin Green. This governance model is essential to avoid the current fragmentation of information that disadvantages established communities. Girton Parish Council is actively developing a structured evidence base including asset-condition data, gully mapping, pavement assessments, accessibility audits and emerging lifecycle cost modelling. We believe this data allows the Council to contribute effectively to district-level infrastructure planning and ensures that the impacts on

					established communities are accurately represented. We encourage Greater Cambridge to incorporate parish-level evidence into ongoing infrastructure workstreams to support a fair and data-driven approach.
209938	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. Aspects appear unclear. The Draft Planning Obligations SPD included proposals for the funding of both on and off site transport infrastructure (including strategic transport interventions) which seems at odds with Para 1.8 of the BNP report and could therefore give concern to “double counting”. The councils also need to clarify their aims in setting the CIL. The CIL rates proposed appear to maximise that for Offices/R&D but that the other rates appear to reflect that the council intend to continue to use S.106 obligations as the primary mechanism for securing community infrastructure. This puts an unfair burden on the office/R&D sector and could stifle development within this sector which is clearly of great importance to the area. This works against the governments wish to see the Oxford–Cambridge corridor become the UK’s “Silicon Valley”.
209770	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recognises that CIL will be used solely to fund strategic transport infrastructure, with all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. As a result, Section 106 costs will not reduce following the introduction of CIL; instead, CIL will operate as an additional charge on top of existing obligations. This contrasts sharply with the approach taken in Oxford. Oxford City Council’s CIL Viability Study applied a Section 106 allowance of just £4,000 per residential unit, reflecting a model where CIL is the primary mechanism for funding infrastructure and Section 106 is tightly limited to site-specific requirements. Other authorities adopting CIL have taken a similar approach, applying modest Section 106

					assumptions to avoid double-charging and to ensure that CIL replaces, rather than duplicates, existing obligations. Against this backdrop, the £25,000–£46,000 per-unit Section 106 allowances used in the Greater Cambridge Viability Assessment appear unusually high and inconsistent with the stated purpose of CIL. If Section 106 is expected to remain at current levels, and CIL is layered on top to fund transport infrastructure, the combined burden risks exceeding viable levels, particularly for strategic sites that already face substantial infrastructure and policy costs.
209924	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	No, clarity needs to be provided about the purpose for the CIL funding beyond just strategic projects to ensure there is no double counting of infrastructure costs with S106 and CIL operating in tandem.
209828	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent does not dispute that the Infrastructure Statement and CIL supporting statement is clear that the funds are intended for the delivery of strategic transport infrastructure, whilst s106 obligations will continue to be used for other infrastructure such as schools, libraries, doctor's surgeries, sports facilities, community centres, and green infrastructure. However, neither the Infrastructure Statement nor the CIL supporting statement are draft policy and will not be read as such in practice. As such, there is a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations SPD, which has been approved by South Cambridgeshire Council.
209629	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Support	Yes Yes, with reservations. While the principles are clear in the documentation, Parish Councils do not yet experience systematic early involvement in Section 106 discussions. A workable solution requires a

					structured golden thread of information that ensures parish-level evidence flows directly into District and County infrastructure planning. This must include parish budgets, pavements, crossings, drainage, verge and gully data, open-space needs, recreation strategies, neighbourhood-plan evidence and cross-parish mobility patterns.
209764	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent encourages charging authorities to consider identifying the ways in which CIL, and S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy (NPPF paragraphs 8, 20 and 203). It is now well established that heritage is not an adjunct to a healthy economy but an important component of growth, a source of employment and a community resource. The respondent suggests that the Council should consider whether any heritage-related projects within the district would be appropriate for CIL funding.
209951	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recommends that clear guidance is produced to explain how CIL will interact with existing Section 106 obligations for strategic sites so that there is no duplication between CIL funded infrastructure and site-specific infrastructure obligations that have been secured.
209619	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that it is unclear which elements of the infrastructure requirements will be delivered through CIL and which through S106 Obligations instead of CIL. The respondent questions whether there is a risk of double counting and suggest further clarity on how this will be avoided would be helpful.
209946	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 7: Do you agree that it is clear how CIL will operate alongside Section	Object	The respondent does not agree that that it is clear how CIL will operate alongside Section 106 planning obligations. The consultation documents do not provide sufficient clarity on how CIL will interact with Section 106 for employment/logistics developments, particularly for sites like

			106 Planning Obligations?		the industrial/logistics developments proposed along the A14 where significant site-specific mitigation will be required. The consultation overview confirms that CIL is intended to fund strategic transport infrastructure across Greater Cambridge. The documents do not clearly set out: Which strategic transport projects will fall under CIL, Which site-specific transport works will remain under Section 106, How the Council will prevent double counting, How obligations differ between residential and employment developments, A clear "Regulation 123 list" style breakdown (even though the formal Reg. 123 list is no longer used, most authorities still publish CIL/S106 demarcation tables for clarity).
209851	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. There appears to be a concerning lack of coordination between the Draft Charging Schedules and the Cambridge Planning Obligations 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.
209899	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent recognises that CIL will be used solely to fund strategic transport infrastructure, with all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. As a result, Section 106 costs will not reduce following the introduction of CIL; instead, CIL will operate as an additional charge on top of existing obligations. This contrasts sharply with the approach taken in Oxford. Oxford City Council's CIL Viability Study applied a Section 106 allowance of just £4,000 per residential unit, reflecting a model where CIL is the primary mechanism for funding infrastructure and Section 106 is tightly limited to site-specific requirements. Other authorities adopting CIL have taken a similar approach, applying modest Section 106 assumptions to avoid double-charging and to ensure that CIL

					replaces, rather than duplicates, existing obligations. Against this backdrop, the £25,000–£46,000 per-unit Section 106 allowances used in the Greater Cambridge Viability Assessment appear unusually high and inconsistent with the stated purpose of CIL. If Section 106 is expected to remain at current levels, and CIL is layered on top to fund transport infrastructure, the combined burden risks exceeding viable levels, particularly for strategic sites that already face substantial infrastructure and policy costs.
209911	Martin Grant Land and Endurance Estates (Caxton) Ltd [132095]	Savills (Abigail Jones) [132076]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent is concerned about the scale of Section 106 contributions that will continue to be sought alongside the proposed CIL rates. The combined burden of high S106 requirements and CIL may render the delivery of strategic sites challenging or undeliverable.
209656	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	Please refer to Question 3, above. A zero-rated CIL approach, supported by appropriate S106 agreements, is strongly recommended for strategic employment sites. The Councils also consulted on a Planning Obligations SPD in Autumn 2025. It is not clear how that dovetails with CIL. The Draft Planning Obligations SPD also sets out proposals for the funding of both on and off site transport infrastructure (including strategic transport interventions) which seems at odds with Para 1.8 of the LPVA and could therefore give concern to double counting, inconsistent with the CIL 122 Regulations.
209960	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that a zero-rated CIL approach, supported by appropriate S106 agreements, is strongly recommended for strategic employment sites. The Councils also consulted on a Planning Obligations SPD in Autumn 2025. It is not clear how that dovetails with CIL. The Draft Planning Obligations SPD also sets out proposals for the funding of both on and off site transport infrastructure (including strategic transport interventions) which seems at

					odds with Para 1.8 of the LPVA and could therefore give concern to double counting, inconsistent with the CIL 122 Regulations.
209973	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. Further clarity is required. The respondent comments that they understand that the proposed CIL will relate to strategic infrastructure, with all other matters covered by S106 Obligations. However, there is a risk of overlap and potential double-charging. Furthermore, there is already an expectation of some Highway works via S278; there is a new Greater Cambridge Planning Obligations SPD to be adopted; plus there are additional layers of future governance which could potentially include additional CIL mechanisms, including the SDS and a possible Development Corporation.
209841	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent comments that greater clarity would be helpful on how CIL is intended to operate alongside Section 106 in practice. Section 106 should continue to address the direct impacts of individual developments, while CIL is intended to contribute towards wider strategic infrastructure. Clear guidance on how the two mechanisms will work together would provide confidence that there will be no overlap or unintended cumulative impact. Developers need certainty that infrastructure will not effectively be charged for twice through different routes. It will be important that the instalment policy reflects the realities of phased and more complex developments, which might involve longer build-out periods and multiple stages of delivery. Clarity around commencement will also be important, particularly where pre-commencement conditions or ongoing Section 106 discussions affect when development can begin on site. The point at which the levy becomes payable should align with these practical stages of delivery.

209864	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent comments that there is a significant risk of double charging. The SPD anticipates extensive Section 106 contributions for major infrastructure, but the Councils have not set out how these obligations will interact with CIL or how overlap will be avoided. This concern is amplified by the ongoing consultation on the Greater Cambridge Development Corporation (GCDC). Until the GCDC's remit, funding mechanisms and infrastructure responsibilities are confirmed, the Councils cannot demonstrate how CIL, S106 and Development Corporation funding will operate together. Proceeding with CIL in advance of this clarity risks duplication, misalignment and undermining the viability of strategic sites that the GCDC is intended to support.
209917	Trinity College, Cambridge (Emma Woods) [132073]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent does not agree that it is clear how CIL will operate alongside Section 106 Planning Obligations. The respondents landholdings include a number of strategic development sites within Greater Cambridge, including land associated with the Cambridge Science Park. Strategic sites of this scale and complexity, typically carry significant upfront infrastructure costs, long delivery horizons, complex phasing, and substantial planning obligations, all of which place considerable pressure on scheme viability. The application of a uniform CIL charge in these circumstances risks double-counting infrastructure burdens and undermining delivery. The respondent requests that the Councils introduce a nil rate applicable to strategic sites including Cambridge Science Park and provide additional guidance, prior to submission for examination, on how CIL will interact with S106 obligations.
209800	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Object	The respondent comments that while in theory it is possible to establish a clear distinction between CIL contributions and separate but parallel Section 106 contributions, this alignment will be fixed at a point in time and scope, when a planning permission is granted. This may be workable for development likely to be built within a relatively short time horizon. It is not workable in the context of Super Strategic Sites delivered

					over decades. The SPD does not appear to have been drafted with reference to the emerging CIL charging schedule, and does not make clear how transport-related Section 106 contributions will be calibrated or reduced once CIL is in place. The IS and CIL Supporting Statement indicate that CIL receipts will be directed to strategic transport infrastructure, yet the SPD's transport chapter contains no corresponding assurance that s.106 transport contributions will be reduced to avoid double-charging. For Super Strategic Sites, the risk of a 'doubling' of financial outlay, contributing to CIL whilst also retaining full s.106 transport obligations, is not a theoretical concern and would have material impacts.
209805	Vistry Group (Linden Homes) (William Wood, Associate Director - Planning) [132080]		Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent notes Section 5 of the Supporting Statement that states that in “summary a CIL will be used to fund strategic transport projects and Section 106 agreements will continue to be used to fund local infrastructure such as schools, libraries, doctor’s surgeries, sports facilities, community centres, and green infrastructure”. From this wording, it is clear that the intention is for there to be double dipping insofar that developments are expected to pay CIL and in addition the expectation that there will be substantial or full s106 payments (contrary to the original purposes of CIL) and where s106 costs are expected to increase substantially over those historically collected.
209932	Waterbeach Development Company [131760]	Boyer Planning (Mr Matthew Clarke, Director) [146]	Question 7: Do you agree that it is clear how CIL will operate alongside Section 106 Planning Obligations?	Comment	The respondent notes from the consultation documents that the intention is for CIL to be collected primarily for strategic infrastructure, whilst Section 106 contributions will continue to be utilised for local community and other on-site infrastructure items. It is important that there is clarity as to items that are to be funded via CIL and those which are to continue to be funded via contributions or direct delivery governed by Section 106 agreements. It is not evident that sufficient clarity exists within the schedule. In respect to largescale strategic development sites there is particular merit in enabling sole reliance on Section 106 agreements to enable adoption of

					more flexible provisions that will more appropriately reflect their implementation over considerable timeframes, realistically multiple decades in the case of Waterbeach new town.
209604	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	More information is required on how CIL instalment payments can be made on developments, where there are a number of phases.
209594	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	More information is required on how CIL instalment payments can be made on developments, where there are a number of phases
209585	Edward Leigh [132083]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	No view
209644	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Yes The staged payment structure appears fair and proportionate and supports predictable infrastructure planning.
209939	Gonville & Caius College (Alison Stanley,		Question 8: Do you agree that the draft instalment policy	Comment	The respondent gives support to the proposed instalment policy, particularly in respect of projects with a CIL Liability of

	Endowment Property Manager) [130583]		strikes the right balance between income and developer cashflow?		over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months.
209925	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Support	Support is given to South Cambridge District Council's proposed instalment policy, particularly in respect of projects with a CIL Liability of over £500,000 as this will assist with developer cash flow. However the final payment could be extended to 16 months.
209630	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	Yes The instalment schedule appears fair and proportionate.
209952	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The respondent recognises that the draft CIL charging schedule proposes an Instalment Policy which allows CIL payments to be made in staged instalments depending on the total liability. This approach is strongly supported by Homes England. Large-scale developments such as Northstowe are typically delivered over extended timeframes through multiple development phases. For such developments, it is particularly important that the timing of CIL payments aligns with development phasing and cash flow.
209947	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The respondent partially agrees that the draft instalment policy strikes the right balance between income and developer cashflow. While instalments are offered, the draft policy does not strike the right balance for large B2/B8 employment developments or logistics-based sites The instalment timetable is too compressed, does not reflect the cashflow profile of industrial/logistics development, and risks undermining viability. The instalment policies are generic —

					they do not differentiate between development types, development scale, or differing cashflow characteristics. They reflect a standardised approach rather than acknowledging the unique viability constraints of employment land. Specific concerns raised by the respondent includes that Large B2/B8 schemes have fundamentally different cashflow patterns to other development types, The instalment policy's timescales are too front-loaded for logistics development, The A14 corridor lacks cumulative transport assessment, creating further early-stage financial uncertainty, Regional practice reinforces the need for more flexible instalment terms.
209961	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Comment	The respondent does not agree that the viability assessment sufficiently adheres to current planning and CIL regulatory standards. The PPG is clear in directing that strategic sites should be considered when establishing updated CIL levies. The absence of strategic employment site typologies means that the viability assessment falls short of planning guidance. It does not reflect the requirements of NPPF Para 87(b) to consider storage and distribution uses at a variety of scales and fails to take account of market signals, as required by NPPF Para. 32. The lack of data being provided falls short of the requirements of the NPPF, CIL guidance, and Viability PPG, and professional guidance which provide an appropriate level of analysis to support such assessments. The respondent does not believe sufficient provision has been made for a viability 'buffer' when interpreting the viability evidence, resulting in the proposed increase in CIL levy. Such buffers are recommended within the current CIL regulations. As a minimum the viability assessment should be updated to include the consideration of larger strategic sites alongside detailed market evidence to allow proper engagement with the consultation process.
209974	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth,	Question 8: Do you agree that the draft instalment policy	Object	The respondent does not agree that the draft instalment policy strikes the right balance between income and developer cashflow. For multi-phase strategic developments,

		Partner, Planning) [131374]	strikes the right balance between income and developer cashflow?		the respondent supports longer instalments and occupation-linked triggers, plus a deferral provision for situations where there is market stress. This would allow CIL payments to better align with sales/income while safeguarding delivery. Small sites should retain simple 2–3 stage options.
209842	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	No
209801	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 8: Do you agree that the draft instalment policy strikes the right balance between income and developer cashflow?	Object	The respondent comments that the instalment policy has been designed with no obvious consideration of the cashflow profile of strategic scale development. On a Super Strategic Site, the master developer, not the housebuilder, bears the upfront capital risk: the multi-year negative cashflow period, the infrastructure-first investment, and the planning complexity. The respondent, as master developer, commits its capital before housebuilders are on site. Any CIL liability would fall, in practice, on the entity least able to absorb a fixed, irrecoverable charge against a structurally negative cashflow position in the early phases of delivery. The housebuilder customers who build on fully-serviced and de-risked parcels do so against a transparent cost structure. Introducing CIL into that structure, with crystallisation at outline consent or Key Phase Approval, would alter the investment arithmetic in ways that cannot be mitigated by instalment scheduling. The instalment policy addresses the timing of payment; it does not address the more fundamental problem that CIL, as an instrument, is structurally challenging with the economics and delivery mechanics of Super Strategic Sites.
209806	Vistry Group (Linden		Question 8: Do you agree that the draft	Comment	The respondent comments that the introduction of an instalment policy is noted and generally welcomed. In terms

	Homes) (William Wood, Associate Director - Planning) [132080]		instalment policy strikes the right balance between income and developer cashflow?		of the detail of the policy, in scenarios whereby the levy exceeds £500,000 the whole levy (i.e. 100%) is to be paid by 420 days after the commencement of the development. Where the CIL is less than this sum, the whole payment is to be made in less than a year from commencement. The practical effect of this policy in financial terms is that in the vast majority of cases, the levy cannot be paid from revenue generated by the development as it is unlikely a material number of residential occupations would have occurred at the point in time in which CIL is paid. The payment of CIL will therefore require development finance and its associated cost which for larger developments will have implications in terms of peak funds employed, IRR and ROCE. This increased development finance does not appear to have been modelled within the accompanying viability study and which may therefore be an omission which could overstate viability. The respondent requests that an additional category of site is therefore introduced into the CIL instalment policy for larger developments whereby the CIL instalment policy is a point of agreement. This is important to ensure that larger residential developments are not effectively taxed (levied) out of viability and therefore have the unexpected consequence of undermining the delivery of existing and future Local Plans.
209605	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Axis would need to review the subsequent changes to the viability assessment following our comments before we could seek to confirm this.
209595	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Bloor would need to review the subsequent changes to the viability assessment following our comments before we could seek to confirm this
209672	Cambridge Living Streets		Question 9: Do you agree that the	Support	Cambridge Living Streets agree that the Council has met its regulatory requirements in bringing forward this policy.

	(Linda Jones) [132081]		Council has met all regulatory requirements?		
209835	CEG Land Promotions Ltd [132082]	Lichfields (Mr Paddy Hynes, Senior Planner) [131590]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent questions whether the regulatory requirements have been met. 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. 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 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 GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. The Councils have also failed to consider the need for a joined-up funding approach to deliver certain forms of transport infrastructure, such as those which are closely linked to nature recovery. 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. There is a lack of comprehensive testing, failure to account for the real-world sales values across Greater Cambridge (including spatial variation) when testing the Residential and Office and R&D rates.
209586	Edward Leigh [132083]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	No view
209645	Girton Parish Council (Mrs		Question 9: Do you agree that the	Comment	Yes

	Yvonne Murray, Clerk to Girton Parish Council) [131255]		Council has met all regulatory requirements?		Yes, as far as we can tell. The statutory process appears to have been followed. However, the Parish Council requests confirmation that parish-level evidence has been incorporated into the infrastructure assessment, including: • Girton's pavement and accessibility work (Pavements Are for People) • drainage and gully mapping • the active-travel and mobility links between Girton, Histon and Oakington • impacts from Darwin Green, Eddington and North West Cambridge • recreation-ground and pavilion planning • green-space, verge and biodiversity management • community-wellbeing and resilience priorities tied to mobility and social connection This evidence is essential to ensure that established settlements like Girton are not overlooked as strategic plans evolve.
209940	Gonville & Caius College (Alison Stanley, Endowment Property Manager) [130583]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent does not agree that the Council has met all regulatory requirements. The CIL policy needs review particularly in regard to the "offices and R&D" category to allow for: a) different rates for different development types – the separate types could be offices (use class Egi), R&D (use class Egii), mid-tech (which can mix use classes Egii and B2,

					B8) , and light industrial (Egiii); and b) different rates for different geographical zones - the separate zones could be Cambridge City centre, outer Cambridge and rural areas. The viability of each development use category should be robustly tested, across a range of locations within Greater Cambridge to demonstrate a CIL rate which can be supported. The proposed rates for other uses including residential look more reasonable but again given the wide and diverse geographical area we would question why there is a single rate applied throughout. The councils CIL proposals make no mention of the CIL Reg 43 Mandatory Charitable exemption. There is no mention of the discretionary charitable exemptions available under Reg 44 to charities for their commercial developments used wholly or mainly for charitable purposes provided that the income arising from those developments will be mainly applied towards the charitable activities of the institution. The respondent considers that the Councils should introduce an exceptional circumstances policy.
209926	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	No, for the detailed reasons set out within these representations, the Council has not met all regulatory requirements. • It is considered the Council should offer discretionary charitable relief available under Reg 44. • It is considered the Council should offer exceptional circumstances relief available under Reg 55.
209829	Hill Residential [7495]	Lichfields (Mr Paddy Hynes, Senior	Question 9: Do you agree that the Council has met all	Object	The respondent questions whether the regulatory requirements have been met. The Councils have not used appropriate available evidence to inform the preparation of their Draft Charging Schedules. This is because the proposed

		Planner) [131590]	regulatory requirements?		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. 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 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 GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. In particular the emerging GCLP does not consider large-scale residential schemes within are not considered as a sui generis source of infrastructure funding within the evidence base. 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 VR, mean that the approach to viability testing is not robust.
209631	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	Yes Yes, as far as we can tell. However, the Parish Council requests confirmation that parish-level evidence has been included in the infrastructure assessment, including mobility and active-travel needs, drainage and gully-mapping, pavements and accessibility, public realm pressures and neighbourhood-plan evidence.
209621	IWM Duxford [101244]	Turley (Ms Jenny Page, Director) [8711]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The respondent comments that the CIL Regulations require that the charging schedule be informed by appropriate evidence (Regulation 14(1)(b)) IWM questions whether this is the case as the Viability Report

					does not take into account: • the disparity in construction costs in different typologies within the proposed office and R&D category. • The difference in returns dependent upon location in Greater Cambridge • The costs of the policies in the emerging Local Plan e.g. climate change CIL Reg 55 allows charging authorities to grant relief from liability to pay CIL, if there are exceptional circumstances. It is reasonable to assume that as this is included within the Regulations it is recognised that there are situations which warrant this approach and it is understood a number of other authorities include this within their CIL Charging mechanism.
209948	Jaynic Properties Ltd [131673]	Carter Jonas (Peter Mckeown) [7631]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The respondent partially agrees that the Council has met all regulatory requirements in bringing forward this policy. While the Council has met the basic procedural requirements for publishing the Draft Charging Schedule and supporting documents, significant gaps in the evidence base, consultation clarity, and statutory justification mean that the Council has not met the regulatory requirements necessary to support the introduction of CIL on B2/B8 employment sites.
209852	Lolworth Developments Limited [129685]	Lichfields (Mr Josh Hymer, Senior Planner) [129682]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent questions whether the regulatory requirements have been met. 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. 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 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 GCLP, the CGC, and the Cambridge City Deal, on infrastructure delivery. In particular the emerging GCLP does not consider large-scale residential schemes within are not considered as a sui generis source of infrastructure funding within the evidence base. 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 VR, mean that the approach to viability testing is not robust.
209657	Newlands (Cambridge) Ltd & Tritax Big Box Developments Ltd [132096]	Savills (Alexander Reade, Associate Director) [132097]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	We do not agree that the viability assessment sufficiently adheres to current planning and CIL regulatory standards. The PPG is clear in directing that strategic sites should be considered when establishing updated CIL levies noting Paragraph 005 Reference ID 10-005-2018-724) 4. The absence of strategic employment site typologies means that the viability assessment falls short of planning guidance. It does not reflect the requirements of NPPF Para 87(b) to consider storage and distribution uses at a variety of scales and fails to take account of market signals, as required by NPPF Para. 32. The lack of data being provided falls short of the requirements of the NPPF, CIL guidance noting CIL PPG Para 019 Ref. ID: 25-019-20190901, and Viability PPG Para 010 Ref. ID: 10-010-20180724), and professional guidance which provide an appropriate level of analysis to support such assessments.

					We do not believe sufficient provision has been made for a viability 'buffer' when interpreting the viability evidence, resulting in the proposed increase in CIL levy. Such buffers are recommended within the current CIL regulations noting Paragraph 020 Reference ID: 25-020-20190901. As a minimum the viability assessment should be updated to include the consideration of larger strategic sites alongside detailed market evidence to allow proper engagement with the consultation process.
209975	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent does not agree that the Council has met all regulatory requirements. The respondent has concerns regarding the evidence that has been used to support the proposed CIL charges, the adequacies of the infrastructure list that has been used, and whether developer engagement has been proportionate and representative. These matters should be reviewed carefully, and further consultation undertaken if required to ensure compliance and robustness ahead of any Examination.
209843	Royal London Asset Management [132084]	Stantec (Mr Richard Maung, Planning Director) [131015]	Question 9: Do you agree that the Council has met all regulatory requirements?	Comment	The respondent has no specific comments on regulatory compliance but would emphasise the importance of transparency, clarity and consistency in implementation.
209865	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent comments that the Draft CIL Charging Schedules are not supported by a sufficiently robust or complete evidence base to justify the proposed rates or to demonstrate compliance with the requirements of the CIL Regulations and Planning Practice Guidance. The combination of Local Plan uncertainty, incomplete viability testing, unrealistic assumptions and unresolved questions around future infrastructure responsibilities creates a material risk that the proposed CIL rates will undermine the deliverability of development across Greater Cambridge.

209918	Trinity College, Cambridge (Emma Woods) [132073]		Question 9: Do you agree that the Council has met all regulatory requirements?	Object	The respondent does not fully agree that the Council has met all regulatory requirements. The evidence base does not satisfy the requirements of Regulation 14 for R&D typologies. The CIL Regulations require that the charging schedule be informed by appropriate evidence and that the Councils have regard to the actual costs of infrastructure and the economic viability of development. The respondent submits that these requirements have not been satisfied in relation to R&D and laboratory development as well as strategic sites because: • The Viability Report does not model the construction costs of specialist R&D and laboratory buildings as a distinct development typology. • The Viability Report does not apply net-to-gross ratios appropriate to laboratory buildings. • The Viability Report does not account for the full cost of emerging Local Plan sustainability policy compliance (net zero carbon and water efficiency) for energy-intensive R&D uses; and • The evidence base does not demonstrate that the proposed commercial rates will not threaten the viability of specialist R&D development (the most economically significant development typology in Greater Cambridge). The respondent respectfully suggests that the Draft Charging Schedule is not ready for submission to examination until a supplementary R&D-specific viability appraisal is undertaken, published and consulted upon.
209802	Urban & Civic (Richard Edwards, Director of		Question 9: Do you agree that the Council has met all		The respondent recognises the energy and effort that has gone into getting to this stage but is concerned that the Council could be exposed to the challenge that it has not met the regulatory requirements in the following material respects.

	Strategic Planning) [132079]		regulatory requirements?		Section 211(7A) of the Planning Act 2008 requires that a charging authority use appropriate available evidence to inform the preparation of a charging schedule. The evidence base as presented is not appropriate because the IS and CIL Supporting Statement are assessed against adopted local plans with a 2031 horizon whilst the Viability Report is assessed against the emerging GCLP. This internal inconsistency means that the infrastructure the CIL seeks to fund and the assumptions upon which it is viability-tested do not correspond.
209606	Axis Land Partnerships [7784]	Carter Jonas (Peter Mckeown) [7631]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No comment.
209596	Bloor Homes [130265]	Carter Jonas (Peter Mckeown) [7631]	Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	No comment
209670	Cambridge Area Bus Users (Richard Wood, Secretary) [7620]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	It is essential Cambridge City doesn't miss out on its neighbourhood portion due to the absence of Parish Councils within the city. The neighbourhood portion could help to improve the quality of bus stop infrastructure in the city, and fund improvements around Drummer Street bus station. It would be beneficial if transport advocacy groups, including but not limited to, Camcycle, Cambridge Area Bus Users and Cambridge Living Streets were consulted alongside Residents Associations in Cambridge on how neighbourhood portions should be spent.

209661	Cambridge Group of Ramblers (Jane Crawford-White, Group Chair) [130382]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The Cambridge Ramblers would want to see a percentage of the Neighbourhood Portion ringfenced for improving the PROW network.
209612	Dr Alan Lawrence [131259]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Re. the "neighborhood portion", it is important that Cambridge does not miss out on the 15% neighbourhood portion despite not having Parish councils. Community consultation on how this money should be spent in the area will be vital.
209587	Edward Leigh [132083]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Ensure that properly-constituted community, youth, public health, environmental, wildlife and other local organisations are eligible to apply for a share of the neighbourhood portion. To ensure transparency, funding bids should be considered at public forums - parish councils where they exist and community/area forums of elected councillors elsewhere. This would provide a strong purpose and justification for reviving area committees/forums covering the whole of Cambridge, not just areas of new development, as currently.
209646	Girton Parish Council (Mrs Yvonne Murray, Clerk to Girton Parish Council) [131255]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Not applicable to Girton Parish Council. All relevant principles relating to parish-level needs and early engagement have been integrated into our answers above.
209632	Histon & Impington Parish Council (Yvonne Murray) [132086]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	Not applicable to Histon & Impington Parish Council. Relevant principles have been addressed within the main submission.
209649	Ms Hannah Brown [9404]		Question 10: Do you have any comments	Comment	Third, I disagree that the proportion for funding for sites neighbouring development areas should be as low as 15%; it

			on how you feel the neighbourhood portion should be distributed?		should be higher. The neighbouring areas to development often experience greater demand on resources- road infrastructure, schooling, plays pace and GP access therefore a greater proportion should be seen to be locally available to those most impacted.
209803	Urban & Civic (Richard Edwards, Director of Strategic Planning) [132079]		Question 10: Do you have any comments on how you feel the neighbourhood portion should be distributed?	Comment	The respondent comments that in relation to Super Strategic Sites, Section 106 Agreements must ensure that the impacts of development are fully mitigated. In most circumstances, those 'neighbourhood' needs will be all-encompassing and internal to the development, or require specific contribution to off-site services and facilities which may or may not relate to CIL spending priorities. Separate additional contributions towards wider local facilities elsewhere will rarely relate directly to the development in question. In relation to Super Strategic Sites the focus must remain on securing the highest quality of new development and the community facilities directly related to it. This further reinforces the case for continuing reliance on Section 106 Obligations alone in relation to strategic scale development, with neighbourhood priorities addressed through the comprehensive s.106 framework rather than a discretionary CIL allocation mechanism.
209870	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Other comments	Comment	The respondent comments that the Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor's Transport Strategy, or potential borrowing against future CIL receipts will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.

209869	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Other comments	Comment	The respondent comments that the creation of a new unitary authority would transfer responsibility for planning, infrastructure delivery and CIL to a new body. This introduces uncertainty around future governance, infrastructure priorities and funding mechanisms. A newly formed authority may wish to review the Charging Schedule, Infrastructure Funding Statement and wider developer contributions framework. As such, a Charging Schedule adopted immediately prior to reorganisation may require early reassessment, which is a relevant consideration when determining appropriate rates and ensuring sufficient viability headroom.
209868	Anglia Ruskin University [228]	Savills (Abigail Jones) [132076]	Other comments	Comment	The respondent is a registered charity for the purposes of the CIL Regulations, and therefore may qualify for Mandatory Charitable relief where it holds a material interest in the land and the development is used wholly or mainly for charitable purposes (i.e. not for commercial gain). However, the 2026 Greater Cambridge CIL documents do not state whether Discretionary Charitable relief will be offered. This creates uncertainty for ARU's mixed-use schemes, where Mandatory Charitable relief alone is not sufficient.
209778	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.

209779	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209777	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209780	Babraham Research Campus Ltd [129595]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209760	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing

					pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209761	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209759	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209762	BioMed Realty [131008]	Bidwells (Miss Aoife Hand, Senior Planner) [131007]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the

					extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209876	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209877	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209875	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.

209878	Brockton Everlast c/o Bidwells [132069]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209794	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Other comments	Comment	The respondent notes 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.
209793	Cambridge Growth Company (Alexander Savine, Assistant Director of Planning & Place) [132078]		Other comments	Comment	The respondent states that, within their 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, the respondent 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 the respective organisations.

209858	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Other comments	Comment	The respondent comments that consultation is also being undertaken at the same time as the Government's consultation on the proposed Greater Cambridge Development Corporation (GCDC), which runs until 1st April 2026. The GCDC is proposed to be a government-backed body tasked with coordinating, funding, and accelerating large-scale growth across Cambridge and South Cambridgeshire, with a focus on enabling sustainable expansion while addressing infrastructure constraints and housing delivery. Proceeding with the implementation of a local CIL before the GCDC's delivery responsibilities and funding mechanisms are confirmed creates a clear risk of double-charging for infrastructure. The Government has committed an initial £800 million to the GCDC and Oxford Development Corporation specifically to unlock key sites, remove barriers to sustainable growth and accelerate housing delivery. At this stage, it is unknown which elements of strategic infrastructure this funding will subsidise, how it will interact with existing Greater Cambridge Partnership (GCP), or what additional mechanisms the GCDC may introduce to capture land value. In the absence of this clarity, it is not considered appropriate to set CIL Charging Rates, as the Councils cannot yet demonstrate which infrastructure items will be funded by CIL, which will fall to the Development Corporation, and which will remain the responsibility of individual developments. Moreover, the boundary of the Development Corporation is to be resolved. This lack of clarity on other funding, and which parts of Greater Cambridge it will relate to, provides further support for the publication of a CIL Charging Schedule alongside a new Local Plan and clarification of the role, funding and boundary of any Development Corporation.
209859	Cambridge University Hospitals NHS		Other comments	Comment	The respondent comments that it is welcome and essential that, as 'All other uses', developments for the provision of medical or health services are categorised as having a CIL

	Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]				rate of £0. The respondent would wish to reach written agreement that these are zero rated to avoid ambiguity. The respondent has a range of other potential developments which may come forward in the next few years to support its core purpose as a hospital, which may be affected by CIL.
209857	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Other comments	Comment	The respondent comments that the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018 were adopted 8 years ago. It is contended that the introduction of a CIL Levy Charging Schedule now (anticipated in 2027) based on the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018, and with the Greater Cambridge Local Plan due to be submitted for examination this year, risks becoming out of date almost immediately (and likely before any meaningful contributions are collected). If the Councils consider it critical to implement CIL now to provide some additional match funding for City Deal projects, then we would suggest clarity is provided on the process, timescale and scope of any review. Any such review should consider the merits of CIL funding being directed to health and social care investment.
209860	Cambridge University Hospitals NHS Foundation Trust (Carin Charlton, Director of Capital, Estates & Facilities Management) [130588]		Other comments	Comment	The respondent comments that the Oxford charging schedule, which in relation to office and R&D space this charging schedule is comparable with, only came in to force in August 2025 and so it is too early to draw any meaningful conclusions in relation to its effect on the delivery of development. The impression given is that the Oxford example was the starting point for identifying an appropriate rate in Cambridge.

209907	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that creation of a new unitary authority would transfer responsibility for planning, infrastructure delivery and CIL to a new body. This introduces uncertainty around future governance, infrastructure priorities and funding mechanisms. A newly formed authority may wish to review the Charging Schedule, Infrastructure Funding Statement and wider developer contributions framework. As such, a Charging Schedule adopted immediately prior to reorganisation may require early reassessment, which is a relevant consideration when determining appropriate rates and ensuring sufficient viability headroom.
209908	Endurance Estates and Pigeon [132094]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that the Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor's Transport Strategy, or potential borrowing against future CIL receipts will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.
209771	Hallam Land Management [7546]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that creation of a new unitary authority would transfer responsibility for planning, infrastructure delivery and CIL to a new body. This introduces uncertainty around future governance, infrastructure priorities and funding mechanisms. A newly formed authority may wish to review the Charging Schedule, Infrastructure Funding Statement and wider developer contributions framework. As such, a Charging Schedule adopted immediately prior to reorganisation may require early reassessment, which is a relevant consideration when determining appropriate rates and ensuring sufficient viability headroom.

209927	Henry Boot Developments Limited [131707]	Twenty5 Planning Ltd (Ms Lydia Voyias) [131260]	Other comments	Comment	The respondent considers it would be beneficial to the Council to include an Exceptional Circumstances Relief. Whilst it is acknowledged that such a relief can only be used in rare situations, it would not be able to be drawn upon and implemented at all if it is not included as part of the charging schedule. As such it would not cause any detriment to the Council to include it.
209765	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]		Other comments	Comment	The respondent notes that exemption or relief is mentioned in the Supporting Statement. However, no reference is made to discretionary relief for exceptional circumstances; where development which affects heritage assets and their settings and/or their significance, may become unviable if it was subject to CIL. The respondent recommends that this is added both to the Supporting Statement and the Charging Schedule itself. An example could be where CIL relief would enable the restoration of heritage assets as identified on Historic England's 'Heritage at Risk Register'.
209954	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Other comments	Comment	The respondent comments there must be a reference in the published charging schedule and any supporting guidance that the LPA have the rights to reduce or waive CIL is exceptional circumstance, known as Exceptional Circumstances Relief (ECR) and requests that the Councils do elect for ECR to be allowed, provided that it meets the criteria of the CIL Regulations. This must be referenced in the published charging schedule and any supporting guidance.
209953	Homes England [132047]	Homes England (Mr James Hawkins) [131578]	Other comments	Comment	The respondent considers that the Councils should reaffirm in the published charging schedule and any supporting guidance that Reserved Matters Applications are not subject to CIL liability.
209772	Hughes Hall (Melinda Ashton, Bursar's PA and		Other comments	Comment	The respondent comments that it is important that the Charging Authority provides clear and unambiguous guidance on the application of Regulation 43 in respect of charitable relief. Cambridge colleges are long established exempt charities under UK charity law and frequently undertake

	Compliance Administrator) [132053]				development that is integral to their educational and research functions. However, the interpretation of what constitutes “charitable purposes” for CIL relief can vary between charging authorities, creating uncertainty. Earlier consultations on CIL for Cambridge recognised the appropriateness of charitable relief for college development, and we see no reason for this position to change.
209812	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209813	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief (‘ECR’) policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209811	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without

					reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209814	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209815	Jesus College [132059]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent requests that clear and unambiguous guidance on the application of Regulation 43 in respect of charitable relief, with particular regard for the University of Cambridge Colleges is given.
209900	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that creation of a new unitary authority would transfer responsibility for planning, infrastructure delivery and CIL to a new body. This introduces uncertainty around future governance, infrastructure priorities and funding mechanisms. A newly formed authority may wish to review the Charging Schedule, Infrastructure Funding Statement and wider developer contributions framework. As such, a Charging Schedule adopted immediately prior to reorganisation may require early reassessment, which is a relevant consideration when determining appropriate rates and ensuring sufficient viability headroom.
209901	Martin Grant Land [131257]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent comments that the Councils have not yet demonstrated the scale of the infrastructure funding gap, nor how CIL, Section 106, GCP funding, the Mayor's Transport Strategy, or potential borrowing against future CIL receipts

					will interact. Without clarity on which body will ultimately receive and administer CIL income under potential local government reorganisation, or how the Development Corporation will interface with the Charging Authority, it is not possible to ensure that double-counting will not occur or that CIL will genuinely support strategic transport and infrastructure delivery. These uncertainties reinforce the need to accelerate strategic infrastructure planning discussions before setting CIL rates.
209822	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209823	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209821	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner,	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to

		Planning) [131374]			infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209824	Pioneer Group [132070]	Bidwells LLP (Mrs Jennie Hainsworth, Partner, Planning) [131374]	Other comments	Comment	The respondent requests that the Council exclude the Fitzroy/Burleigh Street/Grafton (FBG) Area of Major Change (AMC) from the CIL Charging Area and apply a £0 per square metre (psm) CIL rate. On the basis of viability, complexity and the existing negotiated Section 106 (S106) contributions package already agreed and directly related to the Grafton Centre Redevelopment project (under Full Planning Permission Ref. 23/02685/FUL), the FBG AMC should be excluded from the Charging Area and have a £0 psm CIL rate.
209884	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209885	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010)

		Planner) [131107]			as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209883	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.
209886	Railpen [132064]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209866	St Johns College [103084]	Savills (Molly Eyles, Associate) [132054]	Other comments	Comment	The respondent seeks clarity on the application of Mandatory and Discretionary Charitable Relief under the Community Infrastructure Levy Regulations 2010. As a registered charity, the respondent would ordinarily expect Mandatory Relief to apply where development is used wholly or mainly for its charitable purposes, including the provision of student accommodation for its own students. However, the position is less clear for accommodation developed by the respondent but occupied by students from other Colleges, or where the development forms part of the College's wider investment activities. Given the collegiate structure of Cambridge and the

					way in which Colleges routinely share facilities and accommodation, it is essential that the Councils set out how they intend to interpret the statutory tests. Without this clarity, the financial implications of CIL for the respondent cannot be fully understood.
209892	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209893	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.
209891	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly

					become outdated or incompatible with future infrastructure delivery priorities.
209894	Stanhope [132060]	Bidwells (Miss Charlotte Tate, Principal Planner) [131107]	Other comments	Comment	The respondent considers it essential that the Charging Authority fully explores the application of a reduced, or indeed nil, CIL rate for strategic sites. These sites are inherently complex, often characterised by unique constraints, significant upfront infrastructure requirements, and bespoke delivery challenges that cannot be captured through standardised viability assumptions. At present, the flexibility afforded through negotiated Section 106 agreements provides an established and effective route for securing the extensive on-site and off-site infrastructure necessary to make such schemes acceptable in planning terms.
209787	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Other comments	Comment	The respondent comments that Greater clarity is needed on how CIL will align with the Spatial Development Strategy (SDS) being prepared by the Mayor of Cambridgeshire and Peterborough. The SDS is expected to identify strategic infrastructure requirements and may introduce a Mayoral CIL as an additional funding mechanism, thereby creating a further layer of developer contributions and increasing pressure on development viability. This uncertainty is further compounded by the Local Government Reorganisation, the outcome of which could fundamentally alter governance arrangements, funding responsibilities and the wider planning framework. Despite this, within the CIL consultation documents, there has been no comment on the creation of a coherent strategy to address the risks associated with the potential for conflicting or duplicated contributions.
209788	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Other comments	Comment	The respondent comments that it is imperative that a Charging Authority introduces an Exceptional Circumstances Relief ('ECR') policy at the point of adopting the Charging Schedule. Under Regulation 55 of the CIL Regulations (2010) as amended, ECR exists precisely to prevent CIL from having an unacceptable impact on the economic viability of development.

209786	Wrenbridge Ltd [6110]	Bidwells (Gareth Pritchard, Partner, Planning) [130582]	Other comments	Comment	The respondent comments that the on-going consultation relating to the centrally-led Greater Cambridge Development Corporation introduces significant uncertainty around future infrastructure delivery responsibilities, potential updates to infrastructure planning and the possibility of new funding streams which may address the existing funding gap, without reliance on CIL. Until these matters are much clearer, it is premature to progress a Charging Schedule that may quickly become outdated or incompatible with future infrastructure delivery priorities.



Cambridge City Council

Community Infrastructure Levy

Draft Instalment Policy

| ~~June January~~ 2026

Instalment Policy

Where no instalment policy is in place, someone has assumed liability and a commencement notice has been submitted (and the authority has not determined a deemed commencement date), then payment is due in full at the end of 60 days after the intended commencement date (see regulation 70(7), and see regulation 7 and section 56(4) of the Town and Country Planning Act 1990, for the definition of 'commencement of development').

Where a charging authority wishes to allow payment by instalments, they must have published an instalment policy on their website (under regulation 69B). Regulation 70 (as amended by the 2012 and 2013 Regulations) provides for payment by instalment where an instalment policy is in place.

The authority has freedom to decide the number of payments, the amount of each payment and the time due. The authority may revise or withdraw the policy when appropriate.

The instalment policy proposed being used by Cambridge City Council is:

		Days after commencement				
Total CIL Liability		120	240	360	~~420~~ 480	600
£0	£49,999	100%				
£50,000	£249,999	50%	50%			
£250,000	£499,999	25%	50%	25%		
£500,000+	~~£999,999~~	25%	25%	25%	25%	
~~£1,000,000+~~		~~20%~~	~~20%~~	~~20%~~	~~20%~~	~~20%~~

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Landowners are ultimately liable for the levy, but anyone involved in a development may take on the liability to pay. In order to benefit from payment windows and instalments, someone must assume liability before the development has commenced (see regulation 70).

Where no one has assumed liability to pay the levy, but a commencement notice has been submitted (and the authority has not determined a deemed commencement date), then payment is due in full on the intended commencement date (see regulation 71(1)).

Where no one has assumed liability to pay the levy, the liability will automatically default to the landowners (see regulation 33) and payment becomes due as soon as development commences (see regulation 71(2)).

Where no one has assumed liability and the authority has determined a deemed commencement date, then payment is due in full on the deemed commencement date (see regulation 71(2)).

If instalment terms are broken the authority must issue a demand notice requiring the payment of the full CIL amount immediately.

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REPORT TITLE: Fleet Replacement & Decarbonisation

To:

Cabinet Member for Climate Action and Environment

Cabinet, 07 July 2026.

Report by:

Peter Birch (Fleet Manager)

Tel: 01223 458266 Email: peter.birch@cambridge.gov.uk

Wards affected:

All

Director Approval: James Elms confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Cabinet/Cabinet Member for decision.

1.	Recommendations
1.1	It is recommended that Cabinet: a) Approves the adoption of an electric vehicle first approach for future fleet replacement, where operationally suitable and economically viable. b) Notes the approved capital allocation of £2 million in 2026/27 and the indicative future capital requirements of £3 million in 2027/28 and £3 million in 2028/29 to support the Fleet Replacement and Decarbonisation Programme, with future years' funding subject to approval through the Council's annual budget-setting process. c) Delegates authority to the Director of City Services, in consultation with the Executive Councillor for Climate Action and Environment and the Chief Finance Officer, to approve individual vehicle replacement decisions and associated procurement activities within the approved capital budget and in accordance with the Council's Contract Procedure Rules.

2.	Purpose and reason for the report
2.1	Cambridge City Council operates approximately 120 vehicles supporting a wide range of frontline services. A significant proportion of these vehicles are now beyond their anticipated replacement life, resulting in increasing maintenance costs, reliability concerns and growing operational risk. The Council has reviewed its fleet replacement requirements, future operational needs, available vehicle technologies and decarbonisation opportunities. This review identified a phased replacement programme, adopting an electric vehicle first approach where operationally suitable and economically viable, as the most practical and cost-effective approach to modernising the fleet whilst supporting the Council's net zero ambitions. This report sets out the proposed approach to future fleet replacement and decarbonisation and seeks approval for the adoption of an electric vehicle first replacement strategy together with the associated governance arrangements for future fleet investment decisions.
3.	Alternative options considered
3.1	3.1 Option 1 - Do Nothing (Rejected) Under this option, the Council would continue operating the existing fleet without a structured replacement programme and replace vehicles only when they become uneconomical to repair or are no longer operationally viable. This option was rejected as a significant proportion of the fleet is already beyond its anticipated replacement life, with some vehicles dating back to 2008. Continuing to defer investment would likely result in increasing maintenance costs, greater vehicle downtime, increased risk of service disruption and continued reliance on older, higher-emission vehicles. Furthermore, this option would not support the Council's climate emergency commitments or ambition to achieve net zero carbon emissions by 2030.
3.2	Option 2 - Replace Fleet with Like-for-Like Diesel Vehicles (Rejected) Under this option, vehicles would be replaced on a like-for-like basis using conventional

3.3	diesel-powered vehicles. This option was rejected because it would not support the Council's Climate Change Strategy, declared climate emergency or net zero ambitions. Whilst diesel vehicles may offer lower initial capital costs in some cases, this approach would result in substantially higher lifetime carbon emissions and higher whole-life operating costs when compared with the recommended fleet replacement approach. Option 3 - Immediate Full Electrification of the Fleet (Rejected) Under this option, all fleet vehicles would be replaced with battery electric alternatives at the earliest opportunity. This option was rejected as several specialist vehicle categories currently do not have operationally suitable electric alternatives capable of meeting service requirements or would require disproportionate infrastructure investment and operational changes. Operational assessment identified a number of specialist and heavy-duty vehicles for which alternative solutions should continue to be explored until technology matures further.
3.4	Option 4 - Phased Fleet Replacement and Decarbonisation Programme (Recommended) Under this option, the Council would implement a planned fleet replacement programme over three years, prioritising battery electric vehicles where operationally suitable and economically viable. Alternative low-carbon technologies and fuels, including Hydrotreated Vegetable Oil (HVO), would only be considered where electrification is not currently feasible and supported by a robust operational assessment and business case. This option was recommended because it provides a balanced and deliverable approach that supports the Council's climate objectives, renews an ageing fleet, improves operational reliability, reduces long-term operating costs and allows emerging vehicle technologies to be adopted as they become commercially viable.
4.	Background and key issues
4.1	The Council declared a Climate Emergency in 2019 and has committed to achieving net zero carbon emissions from its own operations by 2030.

4.2	The Council currently operates approximately 120 fleet vehicles and plant assets supporting environmental services, housing services, grounds maintenance, bereavement services and other frontline functions. A significant proportion of these assets are now beyond their intended operational life, with some vehicles dating back to 2008. Whilst preventative maintenance has maintained service availability, increasing vehicle age is resulting in higher maintenance costs, increased downtime risks and growing challenges in sourcing parts. Fleet replacement can no longer be deferred indefinitely without increasing operational and financial risk. The highest-risk assets are currently concentrated within Streets and Open Spaces and Housing Maintenance service areas, where vehicle age, utilisation levels and maintenance requirements present the greatest risk of service disruption if replacement is delayed The Council has reviewed its fleet profile, operational requirements, available vehicle technologies, infrastructure requirements and whole-life costs. The review identified that: • A planned replacement programme is preferable to reactive replacement. • Many vehicle categories can now be replaced with battery electric alternatives. • An electric vehicle first approach should be adopted where operationally suitable and economically viable. • Some specialist vehicles do not yet have operationally viable electric alternatives. • Alternative lower-carbon fuels and technologies, including HVO, may be appropriate in limited circumstances where electrification is not currently feasible. This approach provides the best balance between operational requirements, carbon reduction, service resilience and value for money.
4.3	Proposed Fleet Replacement and Decarbonisation Programme This report sets out a three-year Fleet Replacement and Decarbonisation Programme supported by an approved capital allocation of £2 million in 2026/27 and indicative future capital requirements of £3 million in 2027/28 and £3 million in 2028/29, subject to future approval through the Council's annual budget-setting process.

4.4	The programme will prioritise replacement of the oldest, least efficient and highest-risk assets first. Vehicle replacement decisions will be informed by operational requirements, vehicle utilisation, technology availability, infrastructure requirements, whole-life costs and carbon reduction opportunities. An electric vehicle first approach will be adopted throughout the programme. Alternative low-carbon fuels and technologies, including HVO. HVO is intended as a transitional solution for vehicle categories where electrification is not currently operationally viable. Its use will be limited to those vehicle classes where a robust operational assessment demonstrates that electric alternatives are not yet capable of meeting service requirements. This approach provides sufficient flexibility to respond to developments in vehicle technology whilst maintaining progress towards the Council's decarbonisation commitments. Benefits of the Programme The programme is expected to: • Improve fleet reliability and availability. • Reduce maintenance requirements and operating costs in excess of £75,000 per annum upon completion. • Reduce annual fuel costs in excess of £100,000 per annum • Reduce fleet-related carbon emissions by approximately 320 tCO₂e per annum upon completion of the programme. • Increase the proportion of electric vehicles in the fleet from 12% to approximately 75%. • Where there is no viable EV to use HVO fuelled alternative, further reducing the carbon impact. • Support delivery of the Council's ambition to achieve net zero carbon emissions from its own operations by 2030. • Reduce service disruption risks associated with ageing vehicles. • Provide a structured and planned approach to future fleet investment.

5.	Corporate plan
5.1	The recommendations contained within this report directly support the delivery of Cambridge City Council's Corporate Plan 2022-2027, particularly Priority 1: Leading Cambridge's response to the climate change and biodiversity emergencies and creating a net zero council by 2030. The Fleet Replacement and Decarbonisation Programme supports the Council's commitment to reduce carbon emissions from its buildings, land, vehicles and services and contributes towards the Council's ambition to achieve net zero carbon emissions from its own operations by 2030. The programme will increase the number of electric vehicles within the Council fleet, reduce reliance on fossil fuels and support the wider transition to lower-carbon transport solutions. The recommendations also support Priority 4: Modernising the council to lead a greener city that is fair for all. The programme will replace ageing fleet assets, improve operational reliability, reduce the risk of service disruption and ensure that essential frontline services continue to be delivered efficiently and effectively. Investment in modern vehicle technology will improve fleet resilience, support service transformation and enable the Council to make better use of its assets through a structured and evidence-based replacement programme. The programme aligns with the Corporate Plan objective of using innovation and new technologies to provide high-quality services, whilst ensuring Council resources are invested in a financially sustainable manner that delivers long-term value for residents.
6.	Consultation, engagement and communication
6.1	The Fleet Replacement and Decarbonisation Study included engagement with Fleet Services, operational managers and service representatives across the Council to ensure that operational requirements, vehicle utilisation, service delivery needs and future fleet requirements were fully understood and reflected within the recommendations. In developing the programme, consultation has also taken place with Finance, Procurement and Sustainability colleagues to ensure the proposals are operationally

	deliverable, financially sustainable and aligned with the Council's wider corporate and climate objectives. Subject to approval, implementation of the programme will be undertaken in partnership with affected services, employees and recognised Trade Unions. This will include ongoing engagement regarding vehicle specifications, operational requirements, charging infrastructure, implementation planning, workforce impacts and service delivery arrangements to ensure that the transition is delivered safely, effectively and with the benefit of operational expertise from those who use and manage the fleet on a day-to-day basis.															
7.	Anticipated outcomes, benefits or impact															
7.1	Approval of the Fleet Replacement and Decarbonisation Programme will enable the Council to replace ageing fleet assets, improve operational reliability and support delivery of its net zero commitments. See section 4.4															
8.	Implications															
8.1	Relevant risks															
	The principal risks associated with the Fleet Replacement and Decarbonisation Programme are: <table><tr><th>Risk</th><th>Potential Impact</th><th>Mitigation</th></tr><tr><td>Inflation and market volatility</td><td>Increased vehicle and infrastructure costs may impact affordability of the programme.</td><td>Phased procurement, market testing and ongoing financial review.</td></tr><tr><td>Technology development</td><td>Rapid changes in vehicle and charging technology may affect future replacement decisions.</td><td>Regular review of emerging technologies and flexible replacement planning.</td></tr><tr><td>Limited availability of suitable electric vehicles</td><td>Some specialist fleet categories may not yet have operationally viable electric alternatives.</td><td>Electric vehicle first approach supported by alternative low-carbon solutions where justified.</td></tr><tr><td>Supply chain and procurement delays</td><td>Delays to vehicle delivery or infrastructure installation could impact programme delivery.</td><td>Early procurement planning and phased implementation.</td></tr></table>	Risk	Potential Impact	Mitigation	Inflation and market volatility	Increased vehicle and infrastructure costs may impact affordability of the programme.	Phased procurement, market testing and ongoing financial review.	Technology development	Rapid changes in vehicle and charging technology may affect future replacement decisions.	Regular review of emerging technologies and flexible replacement planning.	Limited availability of suitable electric vehicles	Some specialist fleet categories may not yet have operationally viable electric alternatives.	Electric vehicle first approach supported by alternative low-carbon solutions where justified.	Supply chain and procurement delays	Delays to vehicle delivery or infrastructure installation could impact programme delivery.	Early procurement planning and phased implementation.
Risk	Potential Impact	Mitigation														
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Limited availability of suitable electric vehicles	Some specialist fleet categories may not yet have operationally viable electric alternatives.	Electric vehicle first approach supported by alternative low-carbon solutions where justified.														
Supply chain and procurement delays	Delays to vehicle delivery or infrastructure installation could impact programme delivery.	Early procurement planning and phased implementation.														

	Service delivery impacts	Failure to replace ageing vehicles could result in increased breakdowns and service disruption.	Prioritisation of highest-risk and oldest assets within the replacement programme.
	Failure to achieve anticipated carbon reductions	Carbon savings may be lower than forecast if vehicle technology or operational requirements change.	Ongoing monitoring of fleet emissions and programme performance.
	Local Government Reorganisation	Changes arising from LGR could affect future fleet arrangements and investment priorities.	Programme will be regularly reviewed to ensure alignment with emerging LGR requirements and asset strategies.
	Local Government Reorganisation (LGR)		
8.2	Whilst the detailed implications of Local Government Reorganisation remain uncertain, maintaining an ageing fleet is likely to increase future operational and financial liabilities. The proposed programme will ensure the Council enters any future transition period with a more modern, reliable and sustainable fleet, reducing risk to service continuity and supporting informed asset and investment planning. The phased nature of the investment programme also provides flexibility to respond to emerging priorities, service models and asset strategies developed by any future unitary authority, ensuring investment decisions can continue to be aligned with organisational needs as greater clarity emerges		
	Financial Implications		
8.3	Capital investment and leasing were both considered as potential funding approaches for future fleet replacement. Leasing represents a viable alternative and can reduce upfront capital requirements through predictable revenue payments. It can also transfer certain maintenance and residual value risks to the provider. However, leasing arrangements typically include financing costs, provider overheads and profit margins over the life of the agreement and can reduce flexibility around vehicle ownership, utilisation and replacement timing. For a local authority fleet operating in a demanding environment, additional charges are likely		

also arise where vehicles are returned with damage, excess wear and tear or mileage beyond agreed limits.

Capital investment is considered the preferred funding approach. Whilst requiring greater upfront expenditure, it provides full ownership and control of operational assets, greater flexibility over replacement decisions and supports a long-term approach to asset management. This is particularly important given the specialist nature of parts of the Council's fleet and the need to align replacement decisions with operational priorities, emerging technologies and Local Government Reorganisation.

The Council also operates an established in-house fleet maintenance facility, employing specialist technicians and providing servicing, maintenance and repair support to operational vehicles. A significant move towards a leased fleet model would result in a considerable proportion of maintenance activity being out-sourced, reducing utilisation of the Council's workshop and increasing reliance on third-party providers and supply chains.

Strategic Option Assessment

Criteria	Option 1: Do Nothing	Option 2: Lease Fleet	Option 3: Capital Investment (Preferred)
Service Reliability	● High Risk	□ Low Risk	□ Low Risk
Climate & Net Zero Delivery	● High Risk	□ Low Risk	□ Low Risk
Affordability & Budget Impact	● High Risk	□ Medium Risk	□ Low Risk
Long-Term Value for Money	● High Risk	□ Medium Risk	□ Low Risk
Asset Control & Flexibility	● High Risk	□ Medium Risk	□ Low Risk
Overall Assessment	● Not Recommended	□ Viable Alternative	□ Recommended

Key

	☐ Low Risk / Positive Outcome ☐ Medium Risk / Manageable Impact ☒ High Risk / Significant Concern Conclusion Capital investment is considered the preferred option as it provides the best balance of operational resilience, long-term value for money and support for the Council's net zero ambitions. The proposed phased programme enables the Council to address the risks associated with an ageing fleet whilst retaining flexibility to respond to future operational requirements, technological developments and Local Government Reorganisation.
	Legal Implications
8.4	Vehicle procurement arising from this programme will be undertaken in accordance with the Council's Contract Procedure Rules, applicable public procurement legislation and the terms of any framework agreements utilised. The proposed delegation arrangements will enable future vehicle replacement decisions to be made within approved budgets and governance arrangements, whilst ensuring compliance with the Council's legal and procurement obligations. There are no other significant legal implications arising directly from the recommendations contained within this report.
	Equalities and socio-economic Implications
8.5	An Equality Impact Assessment (EqIA) has been completed and is attached as an appendix to this report. The assessment identified no significant adverse equality or socio-economic impacts arising from the Fleet Replacement and Decarbonisation Programme. The programme is expected to deliver positive environmental benefits through improved air quality and reduced vehicle emissions, which may particularly benefit groups more vulnerable to the effects of air pollution, including children, older people, pregnant women and some disabled residents.

	The programme does not reduce access to Council services, introduce new charges or alter eligibility for service provision. Improved fleet reliability is expected to support the continued delivery of frontline services across the city.
	Net Zero Carbon, Climate Change and Environmental implications
8.6	The Fleet Replacement and Decarbonisation Programme has been assessed using the Council's Climate Change Rating Tool and has been assigned an overall rating of +H (High Positive Impact). Fleet vehicles represent one of the Council's most significant sources of direct carbon emissions. Fleet fuel consumption for 2025/26 produced 426 tCO₂e. The proposed programme is forecast to reduce emissions to approximately 106 tCO₂e per annum, representing an annual reduction of approximately 320 tCO₂e (75%). Where electrification is not currently operationally viable, particularly within certain specialist and heavy-duty vehicle categories, Hydrotreated Vegetable Oil (HVO) will be used as a transitional fuel. HVO can deliver substantial greenhouse gas emission reductions when compared to conventional diesel and will support continued progress towards decarbonisation whilst vehicle technology continues to develop. The programme is also expected to reduce maintenance requirements, improve vehicle reliability, reduce service disruption associated with ageing assets and support the long-term sustainability of frontline service delivery. The programme will make a significant contribution towards the Council's ambition to achieve net zero carbon emissions from its own operations by 2030 through the adoption of an electric vehicle first approach. The proportion of electric vehicles within the fleet is expected to increase from approximately 12% to 75%, with operational assessment indicating that approximately 85–95 fleet assets are capable of electrification using currently available technology. Current planning assumptions indicate that electric vehicles deliver approximately 66%

	lower carbon emissions than equivalent diesel vehicles. These savings are expected to increase over time as the UK electricity grid continues to decarbonise. The UK Government's ambition is for clean power to meet 100% of electricity demand by 2030, with at least 95% of electricity generation coming from low-carbon sources and no more than 5% from unabated gas, meaning the carbon intensity of electric vehicles is expected to reduce further throughout the life of the programme.
	Procurement Implications
8.7	Vehicle procurement will be undertaken through appropriate public sector procurement frameworks and compliant procurement routes, including frameworks made available through organisations such as Crown Commercial Service (CCS) and TPPL where appropriate. Procurement activity will be phased to align with fleet replacement priorities, market availability, technology developments and approved capital budgets.
	Community Safety Implications
8.8	<i>Summarise here any Community Safety implications (if applicable).</i>
	<i>[Insert Any Other Relevant Implications]</i>
8.9	<i>Summarise here any implications related to this item, using the <u>checklist attached</u> as guidance and seek input from relevant service.</i>
9.	Background documents Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985
9.1	<i>List any documents and other information used to write this report. DO NOT include exempt items. Be specific as anything you list here must be available for public inspection for several years after the committee meeting.</i>

10.	Appendices
10.1	<i>Appendix A – Equality Impact Assessment (EqIA)</i> <i>Appendix B – Climate Change Rating Tool Assessment</i>
	To inspect the background papers or if you have a query on the report please contact • Sean Cleary -Assistant Director Homes and Commercial Services • Peter Birch – Fleet Services Manager

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Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool please contact the Community Equity Team at equalities@cambridge.gov.uk.

Also, once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking.

1. Title of strategy, policy, plan, project, contract or major change to your service

Fleet replacement and decarbonisation

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)

N/A

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?

The Fleet Replacement and Decarbonisation Programme will replace ageing fleet vehicles and plant assets over a rolling three-year period to improve operational reliability, reduce maintenance costs and support delivery of the Council's net zero commitments.

The programme adopts an electric vehicle first approach, replacing vehicles with battery electric alternatives where operationally suitable and economically viable. Where suitable electric alternatives are not currently available, lower-carbon technologies and fuels, including Hydrotreated Vegetable Oil (HVO), may be used as a transitional solution.

The programme aims to reduce fleet-related carbon emissions, improve air quality, reduce reliance on fossil fuels, improve service resilience and provide a structured and sustainable approach to future fleet investment. It supports the Council's ambition to achieve net zero carbon emissions from its own operations by 2030 whilst ensuring frontline services continue to be delivered effectively and efficiently.

4. Responsible Team and Group

City Services – Fleet Services

Responsible Officer: Fleet Services Manager

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- ☒ Residents
- ☒ Visitors
- ☒ Staff

The programme will affect residents, visitors and staff through the replacement of fleet vehicles used to deliver Council services. Residents and visitors may benefit from improved air quality, reduced vehicle emissions and more reliable frontline services. Staff who operate, manage or maintain fleet vehicles will be affected through the introduction of newer vehicle technologies, including electric vehicles and other lower-carbon alternatives.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?

- ☐ New
- ☒ Major change
- ☐ Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)

- ☒ Yes
- ☐ No

The programme will be delivered through collaboration between Fleet Services, Procurement, Finance, Sustainability, Legal Services and operational service areas that utilise fleet vehicles and plant. External partners may include vehicle manufacturers, framework providers such as Crown Commercial Service (CCS) and TPPL, charging infrastructure providers and specialist consultants where required. Ongoing engagement with service managers and vehicle users will ensure replacement vehicles remain operationally suitable and aligned with service requirements.

8. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

Click here to enter text. The assessment has been informed by:

- The Fleet Replacement and Decarbonisation Study.
- Analysis of fleet age, utilisation, fuel consumption and maintenance data.

- The Council's Climate Change Rating Tool assessment.
- Engagement with Fleet Services, operational managers, trade unions and service representatives to understand operational requirements and vehicle suitability.
- Consultation with Finance, Procurement, Sustainability and Legal colleagues during development of the programme.
- Operational experience gained from the Council's existing electric vehicle fleet.
- Cambridge City Council's Climate Change Strategy and Air Quality objectives.

9. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

[Click here to enter text.](#)

Positive impact.

Children, older people and adults at risk can be more vulnerable to the effects of poor air quality. The replacement of older fleet vehicles with lower-emission alternatives is expected to contribute to improved air quality and reduced vehicle emissions. More reliable fleet assets will also support the continued delivery of frontline services relied upon by residents of all ages. No safeguarding concerns have been identified.

(b) Disability

Positive impact.

Improved air quality may benefit some disabled residents, particularly those with respiratory conditions. The programme is also expected to improve vehicle reliability and support continuity of Council services that may be used by disabled residents. No negative impacts have been identified.

(c) Gender reassignment

No impacts have been identified specific to this equality group.

(d) Marriage and civil partnership

No impacts have been identified specific to this equality group.

(e) Pregnancy and maternity

Positive impact.

Improved air quality resulting from reduced vehicle emissions may provide health benefits for pregnant women, new mothers and young children. No negative impacts have been identified.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

No impacts have been identified specific to this equality group.

(g) Religion or belief

No impacts have been identified specific to this equality group.

(h) Sex

No impacts have been identified specific to this equality group.

(i) Sexual orientation

No impacts have been identified specific to this equality group.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- **Low-income groups or those experiencing the impacts of poverty.**
- **People of any age with care experience – this refers to individuals who spent part of their childhood in the care system due to situations beyond their control, primarily arising from abuse and neglect within their families. The term “Care experience” is a description of a definition in law, it includes anyone that had the state as its corporate parent by virtue of a care order in accordance with the Children Act 1989 and amendments.**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_159kt25q).**

Positive impact.

The programme is not expected to have any adverse impact on low-income groups, people with care experience or individuals experiencing multiple forms of disadvantage. Improved air quality and reduced vehicle emissions may provide wider community benefits, including for residents who are more vulnerable to the impacts of environmental pollution and poor health outcomes.

The programme does not introduce new charges, reduce access to Council services or change eligibility for service provision. Improved fleet reliability is expected to support the continued delivery of frontline services relied upon by a wide range of residents, including those experiencing poverty, care-experienced individuals and people with multiple protected characteristics.

No negative impacts have been identified.

10. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqlA accordingly.)

The Equality Impact Assessment will be reviewed annually throughout the implementation of the Fleet Replacement and Decarbonisation Programme and updated if any new equality impacts are identified.

Fleet Services will continue to engage with service managers, vehicle users and other stakeholders during vehicle replacement planning to ensure operational requirements are met and that no unintended barriers are created for staff or service users.

The programme will be monitored through existing governance arrangements, including fleet performance reporting, service feedback and programme review meetings. Should any adverse equality impacts be identified during implementation, appropriate mitigation measures will be developed and incorporated into future vehicle replacement decisions.

The EqlA will be formally reviewed following completion of the initial three-year programme or sooner if there are significant changes to the programme scope or delivery approach.

11. Do you have any additional comments?

No additional comments. No further equality impacts have been identified at this stage.

12. Sign off

Name and job title of lead officer for this equality impact assessment: Peter Birch, Fleet Manager.

Names and job titles of other assessment team members and people consulted: James Elms, Director City Services Group Director

Date of EqlA sign off: 16th June 2026

Date of next review of the equalities impact assessment: 16th June 2027

Date to be published on Cambridge City Council website: TBC

All EqlAs need to be sent to the Community Equity Team at equalities@cambridge.gov.uk

Project: Fleet replacement and decarbonisation

Date: 16th June 2026

Your Name: Peter Birch

1. IMPACT ON CARBON EMISSIONS (MITIGATION OF CLIMATE CHANGE)								
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE FOLLOWING KEY AREAS:	WHAT IS THE IMPACT CONSIDERED TO BE? <i>See guidance in the purple box, below, to help you assess the degree of the negative and positive impacts e.g. High, Medium or Low</i>	CLIMATE CHANGE RATING: <i>Use drop down list</i>	WILL THE PROJECT MOVE CAMBRIDGE CITY COUNCIL CLOSER TO THE OBJECTIVE OF BEING NET ZERO CARBON BY 2030? <i>Use drop down list</i>	WILL THE PROJECT MOVE THE CITY CLOSER TO THE OBJECTIVE OF A NET ZERO CARBON CAMBRIDGE BY 2030? <i>Use drop down list</i>	PLEASE DETAIL HERE THE ACTION THAT WILL BE TAKEN TO AVOID, MITIGATE OR COMPENSATE FOR THE NEGATIVE IMPACTS AND MAXIMISE POSITIVE IMPACTS?	HAS A NET ZERO CARBON OPTION BEEN CONSIDERED? PLEASE PROVIDE DETAILS.		
1 ENERGY USE	Positive Impact: Energy use will be reduced or renewable energy will be used	High Positive	Yes	Yes	Consider: • Reducing demand for energy: Specifying energy efficiency measures (e.g. insulation, low energy lighting) • Generating renewable energy (e.g. heat pumps, solar photovoltaic panels) The programme adopts an electric vehicle first approach, replacing older fossil fuel-powered vehicles with battery electric alternatives where operationally suitable and economically viable. Whilst electricity consumption will increase through vehicle charging, overall reliance on fossil fuels will reduce significantly. Vehicle replacement decisions will continue to consider whole-life energy consumption, charging requirements and operational efficiency.	Yes. A full fleet electrification option was considered. Operational assessment identified that some specialist vehicle categories do not currently have suitable electric alternatives capable of meeting operational requirements. The recommended option therefore maximises electrification wherever feasible whilst using transitional lower-carbon solutions only where necessary.		
	Nil Impact: No extra energy use is involved							
	Negative Impact: More energy (gas and/or electricity) will be consumed (by CCC or others)							
2 WASTE GENERATION	Positive Impact: Less waste will be generated OR amount of waste that is reused/ recycled will be increased	Medium Positive	Yes	Yes	Consider: • Will resources be reduced or reused? • Will you use recycled goods? • Will recycling facilities be increased? Fleet replacement will be undertaken through planned asset management processes. Vehicles removed from service will be disposed of through approved routes, extending asset life where possible through resale, reuse or recycling. Newer vehicles are expected to require fewer replacement components and major repairs, reducing maintenance-related waste over time.	Yes. Replacement decisions prioritise operational efficiency, vehicle longevity and lower-carbon technologies. Asset disposal and procurement arrangements will seek to maximise reuse and recycling opportunities wherever practical.		
	Nil Impact: No waste will be generated							
	Negative Impact: More waste will be generated (by CCC or others)							
3 USE OF TRANSPORT	Positive Impact: The use of transport and/or of fossil fuel-based transport will be reduced	High Positive	Yes	Yes	Consider: • Will you purchase an electric vehicle? • Will you specify the use of public transport? • How will you reduce the need to travel or transport goods? The programme will significantly reduce fleet-related carbon emissions through the adoption of an electric vehicle first replacement strategy. Older and less efficient vehicles will be replaced with lower-emission alternatives, reducing fossil fuel consumption, greenhouse gas emissions and local air pollutants. HVO will only be considered as a transitional fuel where electrification is not currently operationally viable.	Yes. A full fleet electrification option was assessed. Whilst not currently achievable across all vehicle categories due to operational and technological limitations, the recommended approach maximises the deployment of electric vehicles and provides a practical pathway towards the Council's Net Zero 2030 commitment.		
	Nil Impact: No extra transport will be necessary							
	Negative Impact: CCC or others will need to travel more OR transport goods more often/ further							
4 SUSTAINABLE FOOD	Positive Impact: Food will be locally grown and/ or meat-free	Nil	No	No	Consider: • Use of locally grown/ produced food • Reducing use of imported food • Reducing use of meat The Fleet Replacement and Decarbonisation Programme has no direct impact on food production, food sourcing or food consumption and therefore no material impact on sustainable food objectives.	Not applicable. The proposal relates to fleet replacement and vehicle decarbonisation and has no direct relationship to food provision or sustainable food supply chains.		
	Nil Impact: No change in supply of food							
	Negative Impact: Food will travel long distances and include meat							
2. IMPACT ON RESILIENCE (ADAPTATION) TO THE EFFECTS OF CLIMATE CHANGE								
HOW WILL THIS PROJECT/PROPOSAL AFFECT THE FOLLOWING KEY AREAS:	WHAT IS THE IMPACT CONSIDERED TO BE? <i>See guidance in the purple box, below, to help you assess the degree of the negative and positive impacts e.g. High, Medium or Low</i>	CLIMATE CHANGE RATING: <i>Use drop down list</i>	WILL THE PROJECT HELP CAMBRIDGE CITY COUNCIL TO BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE? <i>Use drop down list</i>	WILL THE PROJECT HELP CAMBRIDGE TO BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE? <i>Use drop down list</i>	PLEASE DETAIL HERE THE ACTION THAT WILL BE TAKEN TO AVOID, MITIGATE OR COMPENSATE FOR THE NEGATIVE IMPACTS AND MAXIMISE POSITIVE IMPACTS?	HAS A NET ZERO CARBON OPTION BEEN CONSIDERED? PLEASE PROVIDE DETAILS.		
5 HEATWAVES	Positive Impact: Increased/ improved shade & natural ventilation	Nil	No	No	Consider: Building Orientation and installing measures such as Brise Soleil to reduce heat gain and plant hydration methods. The Fleet Replacement and Decarbonisation Programme does not directly affect levels of shade, natural ventilation or heat mitigation measures. The proposal is therefore considered to have no material impact on resilience to heatwaves.	Yes. An electric vehicle first approach has been adopted where operationally suitable and economically viable. However, the proposal does not directly affect resilience to heatwaves.		
	Nil Impact: No impact on existing levels of shade & ventilation							
	Negative Impact: Lack of or reduced shade (e.g. from trees or buildings) & natural ventilation							
6 WATER AVAILABILITY	Positive Impact: Provision made for an enhancement of water efficiency measures to minimise the impact on water resource availability	Nil	No	No	Consider: Managing water use efficiently, installing measures to use less water such as low water use taps, planting drought resistant plants and using rainwater for irrigation. The Fleet Replacement and Decarbonisation Programme does not directly affect water consumption, water efficiency measures or water resource management and is therefore considered to have no material impact on water availability.	Yes. An electric vehicle first approach has been adopted where operationally suitable and economically viable. However, the proposal does not directly affect water availability or water resource resilience.		
	Nil Impact: Levels of water use will not be changed							
	Negative Impact: Water use will increase and/ no provision made for water management = Negative Impact							
7 FLOODING	Positive Impact: Sustainable drainage measures incorporated, positive steps to reduce & manage flood risk	Nil	No	No	Consider: The installation of measures to reduce the speed and increase the absorption of rainwater e.g. green roofs, SuDS, permeable paving etc. and alternative arrangements (business continuity) The programme does not involve building works, drainage alterations or changes to surface water management and is therefore not expected to affect flood risk or flood resilience.	N/A – criterion not directly affected by the proposal.		
	Nil Impact: Levels of surface water run-off & flood risk are not affected							
	Negative Impact: Levels of surface water run-off will increase, no management of flood risk							
8 HIGH WINDS / STORMS	Positive Impact: Exposure to higher wind speeds is being actively managed & reduced	Nil	No	No	Consider: The need to install stabilisation measures and ensure robust structures resilient to high winds. The proposal does not alter exposure to high winds or storm events and therefore has no material impact on resilience in this area.	N/A – criterion not directly affected by the proposal.		
	Nil Impact: No change to existing level of exposure to higher wind speeds							
	Negative Impact: Exposure to higher wind speeds is increased or is not managed = Negative Impact							
9 FOOD SECURITY	Positive Impact: Opportunities & resources for local food production are increased/ enhanced	Nil	No	No	Source food locally, and provide meat-free catering to reduce vulnerability to food shortages and reduce emissions from transport and farming of food The proposal does not affect food production, food supply chains or access to food and therefore has no material impact on food security	N/A – criterion not directly affected by the proposal.		
	Nil Impact: No change to opportunities & resources for local food production							
	Negative Impact: Opportunities & resources for local food production are reduced							
10 BIODIVERSITY	Positive Impact: Biodiversity will be protected/ enhanced	Nil	No	No	Provide net gain mitigation if required and seek enhancement in projects of all types and scale The proposal relates to fleet replacement and does not involve land use changes, habitat creation or works affecting biodiversity. No material impact on biodiversity is anticipated.	N/A – criterion not directly affected by the proposal.		
	Nil Impact: Level of biodiversity will not change							
	Negative Impact: Biodiversity will decrease							
Weighing up the negative and positive impacts of your project, what is the overall rating you are assigning to your project?:		High Positive	This overall rating is what you need to include in your report/ budget proposal, together with your explanation to be included in the red box below					

Guidance on Assessing the Degree of Negative and Positive Impacts:

Note: Not all of the considerations/ criteria listed below will necessarily be relevant to your project

Low Impact (L)

- * No publicity
- * Relevant risks to the Council or community are Low or none
- * No impact on service or corporate performance
- * No capital assets; or capital assets with lifetime of less than 3 years

Medium Impact (M)

- * Local publicity (good or bad)
- * Relevant risks to the Council or community are Medium
- * Affects delivery of corporate commitments
- * Affects service performance (e.g.: energy use; amount of waste; distance travelled) by more than 10%
- * Capital assets with a lifetime of more than 3 years

High Impact (H)

- * National publicity (good or bad)
- * Relevant risks to the Council or community are Significant or High
- * Affects delivery of regulatory commitments
- * Affects corporate performance by more than 10%
- * Capital assets with a lifetime of more than 6 years

In the box below please summarise the projects impacts (the reasons for the ratings given in column E above) to explain how the overall rating for the project/ proposal has been derived (Cell E37). Please also highlight any negative impacts your project may have and how you plan to avoid, mitigate or compensate for these (as you will have detailed in column I above).

The Fleet Replacement and Decarbonisation Programme is assessed as having a high positive impact on climate change mitigation. The programme directly supports the Council's commitment to achieve net zero carbon emissions from its own operations by 2030 through the adoption of an electric vehicle first replacement strategy and the phased replacement of older, higher-emission vehicles. Fleet vehicles represent one of the Council's most significant sources of direct carbon emissions and the programme is expected to deliver substantial reductions in fossil fuel consumption, greenhouse gas emissions and local air pollutants. Whilst some specialist vehicle categories cannot currently be fully electrified, the programme maximises the deployment of electric vehicles where operationally suitable and economically viable, with alternative lower-carbon solutions only being considered where necessary. No significant negative climate change or environmental impacts have been identified.

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REPORT TITLE: Quarterly Performance Report January to March 2026

To:

Cabinet

7 July 2026

Report by:

Jane Wilson, Chief Operating Officer

Tel: 01223 457860 Email: jane.wilson@cambridge.gov.uk

Wards affected:

All

Director Approval: Jane Wilson confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Committee.

1.	Recommendations
1.1	It is recommended that the Cabinet 1. Note the contents of the attached Quarterly Performance Report for the period 1 January to 31 March 2026
2.	Purpose and reason for the report
2.1	This report is to provide Cabinet with an overview of the Council's performance over the period 1 January to 31 March 2026 (Q4). As this is the report for the final quarter of the year it has some additional information collected on an annual basis and includes the Annual Customer Feedback report.
3.	Alternative options considered: as this is a report for noting only, no other options were considered.
4.	Background and key issues
4.1	Background This report is one element in delivering on the Council's Performance Management Framework Principles and Approach agreed March 2025. The primary objective of the Framework is to enable the Council to be an effective, efficient and high-performing

organisation, successfully meeting its agreed objectives at every level, and enabling effective scrutiny, both internally and publicly, of our performance against those objectives.

Purpose

The primary purpose of the quarterly report is to provide effective strategic oversight, enabling considered decision-making, effective scrutiny, and public visibility.

It achieves this through a consistent, quarterly, high-level factual snapshot of the overall health of the Council, presented in clear, lay terms.

It brings together performance measures, finance, and risk information into one place. These three sources of information taken together provide a rounded picture of the health of the Council.

Format

The report focuses at the whole Council level, split into two parts:

- The Council's general activities and responsibilities
- The Council as a residential Social Landlord

This separation reflects the financial separation between our General Fund, through which all income and expenditure relating the Council's general activities and responsibilities, and the Housing Revenue Account which is ring-fenced for all income and expenditure relating to the Council as a residential social landlord.

For each part, there is a high-level narrative overview, making the link between performance, finance and risk, and an appendix with supporting detail. This incorporates information previously supplied separately in reports covering finance, our social landlord function and the quarterly update on the Housing Development Agency. Their integration into the single quarterly report ensures that it provides an effective overview of the Council as a whole.

Style

The intention is for the report to be straightforward and easy to understand using minimal jargon or specialist language, and where specialist terms are unavoidable, they are explained.

	Schedule The annual pattern of reporting for the quarterly report is set as Q1: September Cabinet, Q2: December Cabinet, Q3: March Cabinet, Q4: June Cabinet. N.B this Q4 is presented to the July Cabinet rather than the June cabinet to align with the publication of the Council's draft statutory accounts, and the timetable for the Q4 report 2026-7 will be reviewed accordingly. Review There will be a review of this report format in Summer 2026, so that any revisions can be incorporated from Q1 of the 26/27 reporting cycle. This timescale reflects that this is a new approach as well as a new report for the Council, with early review and revision a key part of the process to ensure that it does deliver on its purpose. The Performance Management Framework as a whole will be subject to periodic review by Internal Audit as part of the risk-based audit plan, with outcomes reported to the Civic Affairs and Audit Committee, providing additional assurance on its effectiveness and alignment with the Council's governance arrangements. Link to Local Code of Corporate Governance The Quarterly Performance Report to Cabinet is one of the routes by which the Council adheres to the Local Code of Corporate Governance. Most notably it practically demonstrates the management of risk and performance through robust internal control and strong public financial management, and contributes to good practices in transparency, reporting and audit, to deliver effective accountability.
5.	Corporate plan
5.1	<i>Explain how the decision links to the Councils Corporate Plan</i> Corporate plan 2022-27: our priorities for Cambridge - Cambridge City Council The primary link is to objective 4, Modernising the Council to lead a greener city that is fair for all.
6.	Consultation, engagement and communication
6.1	Consultation on the design of the report was undertaken with Members and Officers prior to the first release.

7.	Anticipated outcomes, benefits or impact
7.1	As set out above, the report will provide a quarterly snapshot of the health of the Council, to support effective decision making and scrutiny.
8.	Implications
8.1	Relevant risks
	This report is to note, there are no associated risks with doing so.
	Financial Implications
8.2	This report is to note, there are no associated financial implications
	Legal Implications
8.3	This report is to note, there are no associated legal implications
	Equalities and socio-economic Implications
8.4	There are no equalities or socio-economic implications in noting this report.
	Net Zero Carbon, Climate Change and Environmental implications
8.5	There are no net zero carbon, climate change or environmental implications in noting this report.
	Procurement Implications
8.6	There are no procurement implications in noting this report.
	Community Safety Implications
8.7	There are no community safety implications in noting this report.
9.	Background documents Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985
9.1	<i>n/a</i>
10.	Appendices
10.1	
	To inspect the background papers or if you have a query on the report please contact Jane Wilson, Chief Operating Officer tel: 01223 458760 email:

jane.wilson@cambridge.gov.uk

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Cambridge City Council: Quarterly Performance Report January to March 2026

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Introduction

This report provides a quarterly snapshot of how well the Council is performing, the risks we are facing, and whether we are delivering within our agreed budget.

It covers the period from 1 January to 31 March 2026 (called quarter 4 as it is the fourth three-month period in the financial year) and provides a high-level overview, highlighting areas where there are major achievements or outstanding delivery, and areas that have significant risks, issues or challenges.

The report is split into two parts, the first covering our general responsibilities, the second our role as a residential social landlord. For each part there is an appendix with more detailed information.

For simplicity, central corporate services, which support both our general responsibilities and our social landlord function, are covered in part one of the report. Where there are specific issues affecting the landlord role they are highlighted in the landlord report.

Because this is the final quarter of the 2025/26 year, this report contains additional high level information about the year as a whole, with the Annual Customer Feedback Report included in full in appendix 4.

The Council is on track to publish its draft financial picture for the whole year by 30th June 2026. This is called the draft statement of accounts. An external checking process (audit) will take place, and the final, audited account will be published early in 2027 (by 31st January 2027).

Part One: Our General Responsibilities

The Council carries out a very broad range of activities as part of its general responsibilities. These range from activities relating to our environment, for example domestic waste collection, maintenance of parks and open spaces, air quality monitoring, the 'scores on the doors' food safety inspections; our communities, including community safety, leisure, culture and community facilities, and community engagement; and place making, including planning, inclusive growth, and responding to climate change.

Overview

Between January and March 2026 (**Quarter 4**) the Council:

- Delivered its full range of services (metrics for key services, including waste, planning, customer support, environmental health are included in appendix 1)
- Championed 'Option B' as part of the government's public consultation to shape the way local government is structured in Cambridgeshire and Peterborough from 2028. Option B would create one Council for North Cambridgeshire and Peterborough and another for Cambridge and South Cambridgeshire. The consultation closed on 26 March 2026.
- Received 3-year funding confirmation for Homelessness and Rough Sleeping from Ministry Housing, Communities and Local Government, with the Council awarded just over £2.1 million per year from 2026-2027.
- Secured £5 million to install water saving measures in council buildings across Cambridge and South Cambridgeshire.
- Awarded over £1 million to community and voluntary groups through its 2026/27 round of community grants.
- Funded construction on a renewable energy solar park to power electric bin lorries for Cambridge and South Cambridgeshire.
- Signed the Anti-Racism Charter reaffirming the Council's commitment to equality in the workforce.
- Unlocked £6.25 million to support local people facing poverty, homelessness, and inequality through the Greater Cambridge Impact initiative.
- Was selected as one of five local authorities to test "early voting" – giving voters the opportunity to cast their vote in person on additional days before polling day in May 2026.
- Planted 14 trees as part the city's growing urban forest, as part of the Council's 'Trees for Peace' project.

Agreed:

- The annual budget for 2026/27.
- Following public consultation, the Climate Change Strategy 2026-2031, the City Centre Heat Network Project, the Biodiversity Strategy 2026-2031 and Urban Forest Strategy 2026-2036.
- The response to the Ministry of Housing, Communities and Local Government (MHCLG) consultation on plans to establish a centrally led Development Corporation for Cambridge and South Cambridgeshire.
- A consultation to introduce a Public Spaces Protection Order (PSPO) at Babraham Road Park and Ride. The consultation ran from 27 February to 27 March.
- A public consultation on the draft CIL (Community Infrastructure Levy) Charging Schedule and associated documentation.
- The draft RECAP (Cambridge and Peterborough Waste Partnership) Resources and Waste Strategy 2026-2031 and draft Design-Guide Policy update and subsequent consultations in February 2026.
- The draft Greater Cambridge Planning Obligations Supplementary Planning Document adoption.
- To submit a bid to the Green Heat Network Fund (GHNF) in 2026 to bring forward a City Centre Heat Network.

Key achievements in the period include:

- Recognition as one of the 120 'A' list cities worldwide for the Council's work to mitigate and adapt to climate change.

Significant risks and issues that emerged during the quarter include:

- The impact of the 2026 Iran War. The Council's Business Continuity arrangements were reviewed to ensure the Council was able to continue to deliver essential services and mitigations put in place, including access to fuel to support its operational fleet. Impacts on the Council's budget and financial modelling are also being monitored.

Part Two: Residential Social Landlord

As well as our general responsibilities, Cambridge City Council is also a residential social landlord. The council owns and manages around 7,700 residential properties with an additional 1,250 leaseholders and is actively developing new social housing.

The performance and finances of our landlord function are managed and reported separately to our general responsibilities. Our finances as a landlord are separated out from our general finances and managed through what is called a Housing Revenue Account.

Overview

From January to March 2026 the council approved:

- The Tenant and Leaseholder Involvement Strategy. The strategy sets out how Cambridge City Council will involve tenants and leaseholders in shaping housing services. It explains how the Council will listen, act, and show the impact of resident views. It reflects feedback from residents, staff, and councillors, and aims to build a culture of trust, inclusion, and continuous improvement.
- The Housing Revenue Account budget for 2026-27. This set out a total budget of £41 million during 2026-2027 for the management, repair, maintenance and improvement of council homes to improve the condition and energy-efficiency of council homes. This amount includes:
 - £9.8 million for improving the Energy Performance Certificate (EPC) rating of council homes in the coming year
 - £750,000 this year (and for following years) to address damp, condensation and mould, supporting compliance with Awaab's Law, and
 - Funding for new technology and additional officer posts to improve the council's tenancy audit programme, its support for tenants, and to allow better management of rent arrears.
- As part of the budget setting process, it was agreed that rents would rise by 4.8%, in line with the new Rent Standard issued by the national Regulator of Social Housing this year.

The budget setting report also outlined the council's plans to bid for a Strategic Partnership with the government's Homes England Housing and Regeneration Agency, in order to secure long-term, flexible funding to support the council's target to build 1,300 new council homes by 2036, with a further 1,000 new homes for sale.

The Council continues to work through the refunds owed to tenants following the overcharging of rents and service charges. Due to the large number of refunds and complexity of some accounts this work will be ongoing into at least September 2026. The Regulator removed the Councils' Regulatory Notice for breaching the Rent Standard in October 2025, confirming the Council is now compliant with the Rent Standard.

Housing Improvement Action Plan

As reported in the previous quarter, the outcome of the Inspection by The Regulator for Social Housing was published in October 2025, and the Council received a consumer grading of C2 (grading run from C1 to C4, with C1 being the highest available grade). This is a compliant grade with areas for improvement, which the Council continues to work through as part of its Housing Improvement Action plan to complete the work on these areas. The Council reports to the Regulator every two months and also reports to the Housing Advisory Board on a quarterly basis.

House building developments

In relation to our house building activity, schemes on site at Fanshawe Road, East Barnwell, ATS Murketts, and Newbury Farm continued to be on budget and on schedule at the end of the quarter. Consultations were held for Davy Road and Stanton House with work progressing on design work and reviews with the planning team. In March, the North Cambridge Framework for Change was published and meetings held with tenants, leaseholders and freeholders.

Appendix 1: General Responsibilities: Performance, Finance, and Risk indicators

General Responsibilities: Quarterly Performance Indicators

Key Performance Indicators: General Responsibilities			
Link to Corporate Plan Objectives		Ratings Key	
Leading Cambridge's response to the climate and biodiversity emergencies and creating a net zero council by 2030	1	At or above stretch target	
Tackling poverty and inequality and helping people in the greatest need	2	At or above baseline target	
Building a new generation of council and affordable housing and reducing homelessness	3	Below baseline target/ Needs action	
Modernising the council to lead a greener city that is fair for all	4	No target for this measure	

Title & Description	Baseline target	Stretch target	2025/26				2024/25			
			Q4	Q3	Q2	Q1	Q4	Q3	Q2	Q1
Bins collected on schedule <i>This measures the effectiveness of our domestic waste collection service</i>	99.25%	99.70%	99.9%	99.9%	99.9%	99.9%	99.9%	99.9%	99.9%	99.8%
Household waste sent for reduce, recycling, composting <i>This tracks the percentage of the City's domestic waste that is not going to landfill</i>	48%	50.00%	47.95%	47.92%	48.03%	48.88%				
Street Cleansing inspections of acceptable standard <i>Percentage of Spot inspections across Litter, Detritus, Graffiti & Fly Posting that meet agreed standard</i>	90%	95%	94.4%	92.4%	90.6%	96.0%		95.6%	95.5%	99.0%
% food businesses broadly compliant (rated 3 +) <i>This tracks food safety compliance in the city, as monitored by our environmental health team</i>	93%	97%	97.4%	97.6%	97.6%	98.2%	98.0%	97.8%	97.8%	97.7%
Average time to determine validated householder planning applications <i>This is the number of weeks Greater Cambridge Planning Service takes to determine applications</i>	12	10	7.37	7.92	7.07	7.93	8.03	7.22	7.61	7.69
First Point of Contact resolution <i>This is the percentage of contacts our customer support team is able to resolve without having to refer onwards</i>	86%	89%	89.5%	88.5%	90%	90%	90%	89%	91%	90%
Complaints resolved within target <i>We aim to resolve complaints within 10 working days</i>	70%	85%	75%	84%	72%	75%	83%	84%	81%	76%
Community centre programme balance <i>We aim for facility time to be apportioned to Community (40%), Cultural (30%), and Commercial (30%) activities</i>	10pp away	5pp away	60:22:18	51:30:19	46:28:26	45:30:24				
Private rented properties (inc. HMOs) in the city are made safe & suitable for occupancy <i>This is in line with Housing act 2004, associated regulations and the Councils Private Rented Sector Housing Standard</i>	200 - annual	250 - annual	135 (355)	110 (220)	55 (110)	55 (55)	89 (428)	87 (339)	122 (252)	130 (130)
Days to process benefit claims – Housing Benefits <i>This is a combined average of new and existing claims; new claims require longer to process, and cannot be done in the same speed</i>	9	7	1.5	2	2	3	2	2	3	3
Days to process benefit claims – Council Tax Reduction <i>These are the number of days taken to process claims for housing benefit and Council tax reduction- we are in the top decile nationally</i>		3	1.7	2	2	2	2	2	2	2

Title & Description	Baseline target	Stretch target	2025/26				2024/25			
			Q4	Q3	Q2	Q1	Q4	Q3	Q2	Q1
Change of applicants in housing need <i>This is ensuring the need for social housing is decreasing, or we are meeting their needs</i>	0	-2%	-5.05%	-8.44%	-4.30%	-9.29%	-5.45%	3.27%	4.79%	4.79%
Number of families with children in B&B over 6 weeks <i>The goal is to have no families with children in B&B accommodation for more than 6 weeks</i>	1	0	0	0	1	0	1	1	1	0
Homelessness prevention cases with a successful outcome <i>Of the homelessness prevention cases we undertake, the % that are successful as defined by law</i>	45%	60%	68.8%	55.7%	69.4%	54.3%	54.7%	59.7%	56.3%	54.2%
Repeat homelessness, or threat of homelessness, when previously resolved in last 2 years <i>Looking for effectiveness of past resolutions & reduction in repeat homelessness (past resolutions through housing advice or statutory duty)</i> <i>Note: due to concerns of accuracy, past quarters performance has been updated in this report</i>	TBC	TBC	3.2%	3.0%	4.38%					
Rough sleepers on a single night <i>Quarterly average of a monthly count of rough sleepers, Rating comes from improvement compared to previous years results</i>	Year on Year Improvement		26	28	35	37	23	26	27	26
Private homes retrofitted to Increase EPC rating <i>We are funded to lead this work across the County, city numbers are currently low because this phase is for homes without gas</i>	n/a		2	3	3	3	2	0	1	0
No of volunteer Hours <i>Volunteers worked hours logged</i>	n/a		35	154	83	123	27			
No of corporate groups worked with in volunteering	n/a		10	18	32	29	5			

These measures reflect the core services the Council delivers as part of our general responsibilities and show that services are being delivered within our baseline thresholds. They indicate that our core services are being delivered effectively, in the main meeting not only our baseline targets but their stretch targets as well.

The recycling rate has dropped marginally below its target. There are a number of factors that could be contributing to this, including seasonal fluctuation and changes to packaging which have reduced the overall weight of recyclable materials. The Council is expecting the recent roll out of the weekly food waste collection to have a positive impact on future performance and see this figure move back into green.

The balance of community centre bookings reflects an increase in County Council funded one-to-one tuition for those excluded from schools. This is recorded as a community booking but it is dominating the daytime bookings at our smallest centre (Darwin) which is impacting the overall figures. These bookings are a positive part of the overall provision and therefore we will review this measure to ensure that it better reflects the overall success of the community centres programme,

General Responsibilities: Annual Performance

As the final quarterly performance report for 2025/26, additional annual performance information is included here.

The following performance measures are tracked on an annual basis:

Title	Date of Latest Value	Baseline target	Stretch target	2026	2025	2024	2023
Progress towards achieving NO ₂ targets	31/03/2025	20	10		21	19	20
Progress towards achieving PM ₁₀ targets (Particulate matter above 10 microns)	31/03/2025	20	15		16	14	16
Progress towards achieving PM _{2.5} targets (Particulate matter above 2.5 microns)	31/03/2025	10	5		9	7	
Annual average concentrations across all council-owned monitoring sites.							
Targets based on WHO Air Quality Guideline value & the Council's interim Air Quality Strategy targets							
Public & Private county & city wildlife sites in positive management	05/11/2026	85%	90%		90.60%	90.60%	
CCC county & city wildlife sites in positive management	05/11/2026	50%	60%		61.10%	62.5	62.7
Positive conservation management refers to the practice of managing sites to conserve their nature conservation interest.							
Community Centre Occupancy rates	19/02/2026	40	80	58			
Council's electricity consumption (kWh)	31/03/2025	-	-		6,604,254	6,222,379	6,264,584
Council's gas consumption (kWh)	01/04/2025	-	-		8,741,805	10,051,645	11,596,294
Council's Overall / Total Greenhouse Gas Emissions (tCO ₂ e)	02/04/2025	-	-		3,871	4,213	4,722
Greenhouse Gas Emissions from Council Buildings (tCO ₂ e)	03/04/2025	-	-		3,087	3,239	3,437
Greenhouse Gas Emissions from Council Fleet (tCO ₂ e)	04/04/2025	-	-		734	918	1,234

Pollutant levels can vary from year to year. In 2025 there was a small increase in NO₂ levels compared to 2024, likely due to weather conditions that were less favourable for dispersing pollution. However, the overall trend over time shows continued improvement

The Council's total gross greenhouse gas emissions were 8.1% lower in 2024/25 than in 2023/24 (emissions total was 4,213 tCO₂e) and 51.9% lower than the 2014/15 baseline (emissions total was 8,041 tCO₂e) and so the emissions total is lower over the period by 4,170 tCO₂e. The Annual figures for 2025/26 will be available in Sept/Oct 2027.

General Responsibilities: Annual Overview

Annual report	Overview
Customer Complaints	• In 2025-26, the total number of complaints received by the Council was 959, which is an increase of 104 cases (12%) from the previous year's total of 855. When put into context with the amount of service requests and contacts made to the Council, (225,000), this accounts for less than 0.1% of contacts received resulting in a formal complaint. • Of those 959 complaints, 86% (822) were resolved successfully at the first stage without need for escalation. This compares with 86% in 2024-25, and 90% in 2023-24. • 137 complaints were escalated to stage two, which is 19 more than in the previous year. • 24 complaints were made to the Local Government Ombudsman. Of these, two cases were progressed to be investigated by the LGSCO, and one was upheld. 11 cases were closed following initial enquiries, and a further 11 were outside of the Ombudsman's jurisdiction. • The Housing Ombudsman Service report for 2025-26 has not yet been distributed to the Council for inclusion in this report. • The full Customer Feedback Report is included at appendix 4
Annual Impacts for Resettlement and Community Equity (Apr 25 – Mar 26)	• Supported over 300 refugees to resettle and rebuild their lives in Cambridge and the surrounding areas. • Awarded £133,000 to voluntary and community groups supporting refugees • Provided free activities to 23,390 children and their family members through the Hello Summer Programme • Partnered with CPFT (Cambridge and Peterborough NHS Foundation Trust) to deliver Youth Leadership programmes • Facilitated youth involvement in the design of the Included programme, which aims to build pathways to fulfilling careers for young people from disadvantaged backgrounds, providing opportunities for skills development and career exploration. • Co-designed engagement with the voluntary sector as part of new Equity Strategy, which explains what the council will do to support diverse communities and groups of people. • Further improved the Inclusion and Equity Panel providing stronger governance on equalities • Council led multi-agency partnership to address bike theft has led to a 70% reduction in cycle crime since 2019
Annual Impacts from Housing Support (Jan –Dec 2025)	• 861 Clients supported • £430,889 total income maximised for residents • 100% of sheltered housing tenants surveyed say they feel safe and supported in their home

Annual Impacts from Active Lifestyles (Apr 25 – Mar 26) include:	• Over 15,000 attendances across 1,613 hours of low-cost or free healthy lifestyle opportunities for City residents • 133 participation grants awarded to help young people, families and aspiring athletes access sport and activity • 16 organisations supported to deliver free summer activities • 9 community partners received kickstart funding • 24 different community-based events supported

General Responsibilities: Finance

Finances for our general responsibilities are managed through our General Fund. Our detailed financial reports use our internal groups. These reflect the way we are organised internally, and all our financial reports use this structure, so you can compare our quarterly figures with our published accounts.

All of our reports show figures in a particular way:

- Expenditure is shown very simply as a number, i.e. 1,234.
- Income is shown in brackets, i.e. (1,234)

So, where a budget has spent more than planned it is shown as a simple number because this is an increased amount of expenditure, and where a budget has spent less than planned that is shown in brackets.

Revenue Budgets

The outturn shows that the council has spent £1.9 million less than planned by the end of the year (31 March 2026). At the end of the third quarter, we had forecast that we would spend £0.5 million more than we had budgeted, so the overall position has improved.

We budgeted to use £2.6 million from unallocated General Fund reserves this year. The underspend of £1.9 million means that we will only be required to use £0.7 million (after taking into account budgets carried forward to next year). Outturn by council group is set out in the table below:

Group	Current Budget	Outturn	Unspent budget carried forward	(Under budget)/over budget
	£'000	£'000	£'000	£'000
Chief Executive Office	2,555	2,688	-	133
City Services	1,058	642	-	(416)
Communities	10,240	9,779	17	(444)
Corporate Hub	10,370	5,985	111	(4,274)
Economy and Place	(8,153)	(9,006)	214	(639)
Planning and Building Control	1,559	1,485	-	(74)
Non-service expenditure	14,157	15,202	1,767	2,812
Total net expenditure	31,786	26,775	2,109	(2,902)
Funded by:				
Business rates and council tax	(24,114)	(23,161)	-	953
Government grants	(4,374)	(4,355)	-	19
Use of earmarked reserves	(711)	(711)	-	-
Total funding	(29,199)	(28,227)	-	972
Total General Fund outturn	2,587	(1,452)	2,109	(1,930)

Note that the above figures take into account the proposed carry forward of specific unspent budgets, which is subject to approval by Full Council as part of the 2025/26 outturn report.

The forecast position has improved since Q3. The most notable changes are:

- Due to lower than budgeted spending on the capital programme, there has been no need to borrow externally this year, cash balances for investment have been higher and interest rates have stayed higher for longer. This has reduced capital financing costs (interest and Minimum Revenue Provision to repay loans) and increased investment income, with a total improvement of around £1.2 million
- Income from commercial property has been around £0.9 million higher than forecast at Q3.
- Revenue income from car parking was higher than anticipated in the final quarter of the year, meaning that the position improved by £0.7 million compared to Q3.
- Offset against the above, business rates income has underachieved by £1.0 million this year.

However, early work on budget setting for 2027/28 has identified some significant emerging pressures, including around asset compliance, and it is likely that a significant portion of the 2025/26 underspend will need to be earmarked to address these pressures. A proposal will be put to Full Council as part of the 2025/26 Outturn Report.

A more detailed breakdown to service level is shown below, followed by a table with explanations of the more significant variances.

Group / Service Grouping	Current Budget	Outturn	Unspent budget carried forward	(Under budget)/ over budget
	£'000	£'000	£'000	£'000
Chief Executive Office				
Chief Executive Office	1,022	1,025	-	3
Democratic Services	1,533	1,663	-	130
Total Chief Executive Office	2,555	2,688	-	133
City Services				
Bereavement Services	(734)	(872)	-	(138)
Car Parking	(6,558)	(8,173)	-	(1,615)
Community Safety	366	387	-	21
Garage Services	64	(47)	-	(111)
Management	379	464	-	85
Markets and Street Trading	(528)	(549)	-	(21)
Operational Buildings	526	534	-	8
Sport and Recreation	659	1,216	-	557
Streets and Open Spaces	4,433	5,218	-	785
Waste and Recycling	2,451	2,464	-	13
Total City Services	1,058	642	-	(416)

Group / Service Grouping	Current Budget	Outturn	Unspent budget carried forward	(Under budget)/ over budget
	£'000	£'000	£'000	£'000
Communities				
Community Centres	1,004	958	-	(46)
Community Development	1,765	1,734	-	(31)
Community Grants	1,443	1,437	-	(6)
Community Safety	764	717	-	(47)
Cultural Services	1,049	854	17	(178)
Environmental Health	1,353	1,350	-	(3)
Housing Strategy and Advice	2,124	1,964	-	(160)
Homelessness	535	548	-	13
Management	203	217	-	14
Total Communities	10,240	9,779	17	(444)
Corporate Hub				
Central Costs and Recharges	1,558	(66)	-	(1,624)
Customer Service Centre	2,162	2,007	-	(155)
Financial Services	1,998	1,864	111	(23)
Housing Benefit Expenditure	63	333	-	270
ICT	3,518	3,129	-	(389)
Insurance	1,186	1,613	-	427
Internal Audit	257	213	-	(44)
Investment interest and financing costs	(1,349)	(3,867)	-	(2,518)
Legal Services	872	740	-	(132)
Management	227	199	-	(28)
Office Buildings	1,323	1,206	-	(117)
People and Change	2,170	2,108	-	(62)
Procurement	291	301	-	10
Recharges to Housing Revenue Account	(4,915)	(4,839)	-	76
Revenues and Benefits Administration	1,009	1,044	-	35
Total Corporate Hub	10,370	5,985	111	(4,274)
Economy and Place				
Commercial Property Services	(9,967)	(10,292)	-	(325)
Development	375	259	100	(16)
Economy, Energy and Climate Change	1,104	690	114	(300)
Management	335	337	-	2
Total Economy and Place	(8,153)	(9,006)	214	(639)
Planning and Building Control				
Building Control	165	148	-	(17)
Greater Cambridge Planning Service	1,394	1,337	-	(57)
Total Planning and Building Control	1,559	1,485	-	(74)
Total for all Groups	17,629	11,573	342	(5,714)
Non-service expenditure				
Capital expenditure financed from revenue	7,982	6,342	1,767	127
Contributions to earmarked funds	6,175	8,860	-	2,685
Total non-service expenditure	14,157	15,202	1,767	2,812
Net spending requirement	31,786	26,775	2,109	(2,902)
Funded by:				
Business rates baseline	(4,750)	(4,750)	-	-
Accumulated business rates growth	(8,767)	(7,814)	-	953
Government grants (including NHB)	(4,374)	(4,355)	-	19
Council tax	(10,597)	(10,597)	-	-
Appropriations from earmarked funds	(711)	(711)	-	-
Total funding	(29,199)	(28,227)	-	972
Total General Fund outturn	2,587	(1,452)	2,109	(1,930)

Group	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Chief Executive Office	Democratic Services	Includes £116k net overspend due to changes in members basic and special responsibility allowances. This is slightly offset by an underspend of £29k in the events budget. There is a net overspend of £47k for electoral registration due largely to rising postage, courier, and printing costs and legislative limits on digital alternatives, and annual canvass costs including staff, tablets, and software.	130
City Services	Bereavement Services	Net underspend includes a credit of £227k in relation to the recovery of legal costs incurred in previous years on the A14 settlement – these costs have now been recovered. Without this the service would be showing a net overspend of £89k. This includes an overspend of £114k at the Crematorium reflecting wider national trends across the bereavement sector, with sustained growth in online-only providers offering direct cremation and more customers choosing this simpler, lower-cost option. The position is being actively managed through a review of service offer and pricing. Meanwhile, cemeteries are showing a net underspend of £75k due to increased income. This reflects targeted business improvement activity across the service. There is also a £20k overspend on vehicle repairs reflecting the age of the fleet, with this being managed through planned maintenance and future replacement planning.	(138)
	Car Parking	Income performance reflects strong demand at Grand Arcade, Park Street and Queen Anne Terrace car parks, which has more than offset reduced usage at Grafton Centre following recent closures. Demand at Grafton is expected to improve over time, as new offices and laboratory space become operational. Income has also been supported by the reintroduction of overnight charging and tariff increases in 2025/26. The allocation of some spaces to dedicated EV charging has reduced capacity slightly, although this has been mitigated through returning bays to dual use to optimise overall income.	(1,615)
City Services	Garage Services	Includes overachievement of income on external (£117k) and internal (£98k) work, offset by corresponding overspend of £149k on parts and consumables.	(111)
	Management	A £62k pressure on salaries within this area reflects targeted investment to strengthen leadership capacity across City Services, including the regrading of two posts and the introduction of a Programme Manager role. The overspend also includes focused investment in leadership and management development to establish a strong and consistent City Services leadership team, in the absence of a dedicated training budget.	85

Group	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
City Services (cont'd)	Sport and Recreation	An overspend of £348k within the leisure contract reflects a combination of historic utility recharges and the phasing of the new Leisure Contract Agency model. The budget assumed implementation from April; however the model commenced in August 2025, resulting in the previous operating model continuing for part of the year. This has now been addressed and is reflected in the ongoing budget position from 2026/27. In addition, there is an overspend of £204k on Recreation, including a one-off catch-up on electricity recharges at Jesus Green Pool (where estimated billing has been aligned to actual consumption resulting in a £150k back payment), and salary overspends following the late implementation of the service restructure.	557
City Services	Streets and Open Spaces	Includes salary overspends across the service totalling £430k. This reflects the implementation of the service restructure, including the regrading of posts, structural changes and pay protection arrangements. The timing of implementation from July 2025 rather than April 2025 also contributed to the variance. These changes have now been embedded and are reflected in the ongoing budget position, strengthening the service's leadership and delivery capacity. There is also an overspend of £123k on vehicle hire and repairs, associated with the age profile of the fleet. This is being addressed through the planned vehicle replacement programme, which will reduce maintenance costs and improve reliability over time. A £116k overspend in public toilet cleaning contract costs reflects updated cost levels and service requirements, with this now built into the 2026/27 budget. An overspend of £69k on Open Space Asset Maintenance reflects historic trends, and a £50k budget increase for 2026/27 will bring these budgets in line with actual operating costs.	785
Communities	Cultural Services	A positive variance of £111k on the Corn Exchange and Guildhall is primarily due to an increase in events from 178 last financial year to 208 in 2025/26. This has given the Council an increase in show related income (hire fee, booking fee, recharges, merchandise commission and food & beverages (F&B)). There is also an underspend of £83k within the central Cultural Services team which is primarily due to some staff vacancy gaps during the year – Project Officer, Marketing and Fundraising Assistant and a delay in recruiting the Sponsorship Officer and Marketing Manager.	(178)

Group	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Communities (cont'd)	Housing Strategy and Advice	There has been an increase in the number of properties being managed by Town Hall Lettings which has increased income, coupled with more focused work on recovering rechargeable repairs and minimising void times, as well as some salary underspend due to long term sickness and a vacant post, which has now been filled.	(160)
Corporate Hub	Central Costs and Recharges	Includes £2.025m one-off compensation income in relation to the impact of the construction of the new A14 on the Crematorium. This has been transferred to earmarked reserves and will be used to fund capital works including mitigating works at the Crematorium. Also includes a one-off underspend of £147k on historic pension deficit contributions due to accounting adjustments. This has been offset by £548k of additional staff costs from across the organisation resulting from an above budgeted pay award and increased NI contributions during 2025/26.	(1,624)
	Customer Service Centre	Includes £87k net underspend in staffing budget as a result of high turnover and unused contingency budget. In Business Support there is a net one-off underspend of £68k as a result of one-off income relating to work undertaken in 2024/25.	(155)
	Housing Benefit Expenditure	The net overspend includes subsidy loss of £346k partly offset by £51k overachievement of overpayment recovery. The main pressure continues to be rent allowance subsidy shortfall where entitlement and payment is not fully reimbursed by DWP due to landlords being charitable entities and not Registered Providers. A budget bid has been included within 2026/27 with the intention of addressing this situation.	270
Corporate Hub	ICT	The £389k net underspend includes £174k unused contingency budget for disaster management, £93k underspend from CDIO (Chief Digital and Information Officer) project, £30k underspend from TVI (Triple Value Impact) consultancy project and £80k underspend related to supplies and services. The supplies and services budget has been adjusted for the 2026/27 financial year to reflect the underspend.	(389)
	Insurance	The overspend includes £339k relating to property and fire insurance claims, £94k for liability claims and £60k for insurance premiums. This has been partially offset by a lower claims result in Motor by £37k.	427

Group	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Corporate Hub (contd)	Investment interest and financing costs	No further external borrowing took place in Q4 for the General Fund and this has significantly reduced the interest payable and the Minimum Revenue Provision that needs to be made. As forecast at Q3, there has been increased interest received from loans to the Cambridge Investment Partnership as a result of the drawdown of loans agreed by Full Council in October 2025. Note that £660k of this income has been transferred to the Development Reserve in line with the council's policy to set aside excess amounts for future capital spend. The General Fund also benefits from interest from the HRA on internal borrowing, which has increased this year to avoid more expensive external borrowing for the HRA. In line with the Treasury Management Strategy, it is anticipated that some of this internal borrowing will need to be externalised during 2026/27.	(2,518)
	Legal Services	The underspend of £132k is a result of efficient consumption of legal resource, achieving legal income projections, and underspend due to a vacancy in the Deputy Head of Practice role which is being addressed.	(132)
	Office Buildings	At the Guildhall there was a £104k net underspend on utilities costs due to low building usage, offset by a £56k overspend in business rates following the recent revaluation. There is also a £41k underspend on the Facilities Management team, due to a vacant post.	(117)
	People and Change	Includes a £31k underspend on the Digital and Application Support team as a result of staff vacancy. Recruitment is underway.	(62)
	Recharges to Housing Revenue Account	Underspends on a number of corporate services has seen a corresponding reduction in the recharge to the HRA – essentially this represents the HRA's share of corporate underspends as described elsewhere in this table.	76

Group	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Economy and Place	Commercial Property Services	There was negative impact of £1.05m as a result of the updated ground rent calculations for Lion Yard. These showed that previous amounts paid to the council on account were too high, resulting in a downwards adjustment to rental income of around £350k per year for 3 years. The correct position has been reflected in the 2026/27 budget going forwards. This has been offset to some degree by overachievement of income totalling £440k on other commercial and industrial properties, from a variety of factors including rent reviews and new lease completions. In addition, there is overachievement of income from the Park Street Aparthotel (£813k) due to an accounting adjustment in the treatment of the 6-month rent free period upon lease commencement. There is also an underspend of £122k on the Property Services team due to two vacant posts which were proving challenging to recruit.	(325)
	Economy, Energy and Climate Change	The underspend is due to combination of delays in staff recruitment and £81k cost recovery from capital projects for warm homes and retrofit. There have been some recruitment challenges due to the niche market for posts and shortages of suitable candidates. Some posts have had to be re-evaluated as part of new team development planning.	(300)
Planning and Building Control	Greater Cambridge Planning Service	This is largely due having higher planning application income, unbudgeted government grants and other contributions and costs recovered. These are offset by higher employee related costs and supplies and services overspends most of which relate to the grant funded activities.	(57)
Non-service expenditure	Capital expenditure financed from revenue	Includes financing of £142k of historic unfinanced capital expenditure from excess revenue reserves.	127
	Contributions to earmarked funds	Includes two large unbudgeted contributions in respect of variances above - £2.025m A14 compensation and £660k of income from loans to Cambridge Investment Partnership.	2,685
Funding	Business rates and council tax	Primarily due to underachievement of business rates income following significant rating appeals in recent years. This is a technically complex area and work is underway to better understand the reason for the shortfall and any mitigating actions which can be taken.	953

General Responsibilities: Capital

The outturn position on the council's General Fund capital programme is as follows:

Capital Outturn – Q4 2025/26	Final Budget £'000	Outturn £'000	Unspent budget carried forward £'000	(Under budget)/ over budget £'000
General Fund				
Loans to Cambridge Investment Partnership	36,704	14,663	22,041	-
Park Street development	32,797	13,233	-	(19,564)
Civic Quarter	6,417	4,629	1,788	-
Sustainable Warmth Grant - HUG2	4,638	2,211	-	(2,427)
Operational Hub	3,495	4,767	-	1,272
East Barnwell new centre	3,449	1,241	2,208	-
S106 funded projects	2,232	1,715	560	43
Other capital projects	18,654	8,326	10,336	8
General Fund total	108,386	50,785	36,933	(20,812)

The following individual projects have an underspend or overspend of over £50k, after taking into account budgets carried forward:

Project	Reason for Variance	(Under budget)/ over budget £'000
Park Street development	The Council spent £19.6 million less than budgeted on the Park Street redevelopment, which opened fully this year, as a result of strong contract management. This project is funded from external borrowing, so the underspend reduces the need to borrow rather than releasing any new resource.	(19,564)

Project	Reason for Variance	(Under budget)/ over budget £'000
Sustainable Warmth Grant – Home Upgrade Grant 2	The original budget was higher than the final grant amount received. This is a fully grant funded project which has now been completed successfully.	(2,427)
Operational Hub	The overspend for the new Operational Hub came to a total of £1.3 million, caused by delays from external contractors. It is important to note that the original capital bid was made over five years ago, and since then inflationary pressures—particularly in construction, materials, and labour, have significantly increased the cost base for delivery.	1,272
Mandatory Disabled Facilities Grants (Owner Occupiers)	Annual grant allocation from the government. The budget is underspent, as the funding awarded is not matched to number of residents requiring adaptations. There is no requirement to carry forward the remaining budget.	(256)
Redevelopment of Silver Street toilets	Project completion in early March. Overspend is relating to traffic management from County Council, commodity costs have increased and the project team have been working on the project longer than originally budgeted.	230
Meadows Community Hub and Buchan St retail outlet	The variance arises from additional professional fees, initially expected to be funded from the HRA but ultimately charged to the General Fund without a contingency budget.	126
Cambridge Corn Exchange – infrastructure improvements	Due to the length of the project original costs have risen due to inflation and other pressures	119
Mandatory Disabled Facilities Grants (Tenants)	Annual grant allocation from the government. The budget is underspent, as the funding awarded is not matched to number of residents requiring adaptations. There is no requirement to carry forward the remaining budget.	(70)
Eastnet Connect migration	Underspend as a result of efficient project delivery and underused additional resource.	(67)
Replacement air quality monitoring equipment	Project fully completed well under budget.	(50)

General Responsibilities: Risk

We keep a list of risks that could prevent the Council meeting its goals and its responsibilities, we score those risks to understand how serious they are, and we put in place controls and actions to reduce the level of those risks. All these individual risks feed into our seven strategic risk areas. These strategic risk areas apply across all of our activities, covering both our general responsibilities and our social landlord function. Every risk area is rated either green, yellow, amber or red, as follows:

- Green shows that risk levels in that area are low and well managed.
- Yellow indicates that there is a higher level of risk, but it is still well managed and under control
- Amber flags that the risk level is higher than we want and we are taking action to bring the risk level down. Where the risk level is caused by external factors outside our control and cannot be lowered, it needs to be very closely monitored.
- Red is the most serious level, and where we have a red risk there should be a clear, agreed and closely monitored action plan to reduce the risk.

Strategic Risks

The latest assessment of each strategic risk area is as follows:

	Strategic Risk Area	Risk level
1	The Council is able to deliver on our vision and objectives	Yellow
2	The Council is financially robust	Yellow
3	The Council has an effective and resilient workforce	Green
4	The Council's physical and digital infrastructure is fit for purpose	Yellow
5	The Council has viable and robust plans for the future	Yellow
6	The Council is able to meet its legal responsibilities	Yellow
7	The Council is well governed	Green

What this shows is that the Council has good overall control and effective risk management.

In order to make sure that there is full visibility, any operational risk which is rated either amber or red is also reported, split out by whether they are an operational risk for our general responsibilities (reported here) or for our role as a residential social landlord (reported in appendix 2).

Under our General Responsibilities there are seven amber operational risks and no red risks.

The Council's amber risks are as follows:

Operational Risks

Description	Current Controls	Actions to reduce risk level
Cyber-attack. This is a significant external risk, as seen through examples of attacks on businesses, local authorities, NHS etc	Active system management, mandatory cybersecurity training for staff, easy reporting of suspected phishing emails.	Budget has been agreed for additional external support to ensure 24/7 system oversight. This risk is likely to remain amber.
Accurate accounting for S106 funds as process is updated	S106 funds are logged and tracked in Excel but we are in the process of moving to an improved system. The S106 Monitoring Board meets every 2 months.	New process and systems are being developed, working across Economy and Place, City Services and Shared Planning. These are currently being trialled and are expected to reduce this risk. New S106 recording system in place and admin resource being recruited.
Compliance with statutory requirements across Asset Portfolio	Defined roles and responsibilities for H&S and building compliance via Corporate Landlord model.	Review of operational assets completed and requirements identified are being addressed with completion due September 2026. Review of commercial assets is currently in progress.

Description	Current Controls	Actions to reduce risk level
Compliance with Health and Safety requirements across the Council	Planning, oversight and performance management/monitoring of the organisation's H&S arrangements.	Health and Safety Policy Handbook redeveloped in Q4 with clearer defined roles and responsibilities to support oversight in this area. Roll-out ongoing and to be completed by Q1 2026/27.
Reaching the Council's carbon reduction target	Climate Change Strategy, Climate Change Fund	Updated Strategic Asset Management Plan, providing costs and action plan to deliver MEES and net zero, is due to be reported in 2026-27. Climate Change Strategy 2026 approved in March 2026 and action plan in place to deliver.
Compliance with property safety and repair standards for our corporate and commercial properties	Regular testing and servicing	Compliance review underway and on track to be completed during Q1 26/27, at which point this risk should reduce.
Recruitment and retention of staff within the commercial property team	Training plans, internal recruitment	Some interim resource has been secured and posts have been readvertised with broader reach.

In line with new Economic Crime and Corporate Transparency Act we have developed our risk management system to categorise and report fraud related risks. We are working with colleagues to review existing risks and identify new risks. This new legislation requires all organisations to identify whether any of their activities could be subject to fraud and set out what they are doing to manage the risk of fraud. Individual fraud risks will be reported in the same way as our other risks, so any amber or red fraud risk will be reported here.

Appendix 2: Residential Social Landlord: Performance, Finance and Risk Indicators

Residential Social Landlord: Performance Measures

(for Key, see appendix 1 Performance measures)

Title & Description	Baseline target	Stretch target	2025/26				2024/25			
			Q4	Q3	Q2	Q1	Q4	Q3	Q2	Q1
% statutory safety inspections completed on time in our homes <i>Percentage of all safety-critical and statutory checks that are carried out as required.</i>	95%	99%	97.9%	96.8%	100%					
FRAs, completed or within time, (snapshot of existing risk) <i>Ensures fire safety-critical and statutory checks are delivered as required, followed up by the appropriate actions</i>	95%	99%	100%	100%	94%					
Emergency responsive repairs completed within the landlord's target timescale <i>Reflects speed and reliability of repairs, supporting tenant satisfaction.</i>	90%	95%	93%	96%	87%	93%	95%	88%	98%	97%
Awaab's Law: % responded to request within 2 working days <i>Ensures all safety-critical quality of the Council's housing stock in a timely manner</i>	85%	95%	90%	88%						
Average re-let time in days (standard re-lets) <i>Ensures both loss of income and the time a household is waiting for a home is minimised</i>	38.5	35	56.7	47.5	46.9	43.4	37.3	37.7	39.7	42.7
Void loss - % of rent lost through dwellings being vacant (LCRA) <i>Monitors the impact of empty homes on the council's income stream.</i>	3%	1%	3.07%	2.93%	4.21%	4.16%	3.22%	3.10%	2.96%	3.27%
Current tenant arrears as a % of the annual rent debit <i>Monitors outstanding debts owed to the council</i>	3.85%	3.50%	3.95%	4.19%	3.82%	3.64%	3.27%	3.59%	3.52%	3.48%
Former tenant arrears as a % of the annual rent debit <i>Monitors outstanding debts owed to the council</i>	2.2%	2%	3.8%	3.7%	3.3%	3.0%	3.0%	2.8%	2.7%	2.5%
No. Council housing starts <i>Quarterly update of cumulative total on number of builds started this year</i>	n/a		29	29	29	29	105	0	0	0
No. new affordable homes completed within councils own programme <i>Quarterly update of cumulative total on number of builds completed this year</i>	n/a		126	126	70	70	98	70	24	0
Percentage affordable homes to Camstandard <i>This is about improving the environmental impact of our homes</i>	n/a		83%	84%	79%	79%	78.65%	77.71%	77.71%	76.57%
Homes retrofitted to EPC C rating <i>This is about improving the environmental impact of our homes</i>	Variable based on funding		2	11	7	4	59	72	54	18

These measures are the key pieces of information we track to understand how well we are performing as a landlord. There are a number of measures that are below our baseline target, and there are specific improvement plans in place to bring them up to baseline and beyond.

The Council provides additional performance information to our Housing Advisory Board. The 2025/26 Q3 report is published on the Council

website and can be found here [Housing performance report](#), the Q4 report has not yet been published.

Average re-let time in days and Void loss are connected KPIs, both reflecting the time it takes the Council to re-let properties. Recent changes to the shortlisting process have shown a positive improvement to the timescale. A New Void process has been developed ready for launch in Q1 2026/2027 which should improve the relet times and subsequently the void loss amounts.

Both Current and especially Former Tenant arrears are below target while the Rent regulation project continues to work through the refunds owed. It is important to complete the work on the rent charges, so that we can be certain that any arrears figures are accurate. Once this work is complete in 2026/27, the Council will be able to progress the work on arrears and reduce our former tenant arrears. Separately, two software systems are being brought in that will allow for some automation of actions and better management of our accounts, freeing up Income Officers capacity to work with those tenants who most need our support.

Residential Social Landlord: Finance

We manage the finances of our social landlord responsibilities separately to the finances for our general responsibilities. This is done through a separate account called the Housing Revenue Account (HRA).

Revenue

At the year end of 31 March, the HRA's operating surplus is £6.9 million lower than budgeted, mainly due to overspends on HRA services. To ensure that the HRA balance can remain above its target level, the planned revenue contribution to capital expenditure for the year has been reduced by £6.4 million. This approach is consistent with previous years, but it will increase the amount of borrowing required to finance the capital programme in the longer term.

Service Grouping	Current Budget £'000	Outturn (Under budget)/ over budget £'000	
Income			
Dwelling rents	(51,684)	(52,225)	(541)
Other rents	(1,376)	(1,489)	(113)
Service charges	(4,076)	(4,288)	(212)
Other income	(862)	(356)	506
Total Income	(57,998)	(58,358)	(360)
Expenditure			
Repairs and maintenance	12,871	19,155	6,284
Management	11,245	11,220	(25)
Bad debt provision	527	1,102	575
Depreciation	12,254	12,647	393
Total Expenditure	36,897	44,124	7,227
Net operating surplus	(21,101)	(14,234)	6,867
Net interest cost	8,949	8,284	(665)
Revenue contribution to capital financing	11,140	4,717	(6,423)
Transfers to/(from) earmarked reserves	0	183	183
HRA (surplus)/deficit	(1,012)	(1,050)	(38)

The main reasons for the forecast overspend are:

- increased spend on housing repairs (£2.3 million), including damp, condensation and mould, in order to comply with Awaab's law.
- the need for interim fire safety measures including waking watch at a number of sites (£1.5 million). As a result of work already undertaken, the number of sites with waking watches in place has reduced from eleven to two. It is taking longer than anticipated to address the final two sites as decanting is required.

- additional costs of dealing with voids due to the poor condition of significant numbers of void properties (£1.5 million)
- cost of rectifications (£1.4 million) as a result of fire and other damage to properties
- historic costs for third party management of estates (£0.4 million)

Although budgets have been increased in 2026/27 to reflect genuine cost pressures, the Leadership Team is also continuing to take action to ensure that a tight grip is exerted on costs.

The table on the following page presents all the major variances on the Housing Revenue Account.

Budget Line	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Income	Dwelling rents	Gross rents are higher than budgeted. This is partly due to new council dwellings being let out to tenants earlier than assumed in the budget. The number of dwellings that are being re-let on the basis of rent flexibility is higher than anticipated with an overall positive impact on rental income.	(541)
	Other rents	Consists of £65k overachievement of income on HRA commercial properties (shops) and £48k overachievement of income on HRA garages following changes to the charging structure.	(113)
	Service charges	Overachievement of £143k on leaseholder service charges which vary depending upon actual costs in line with statutory requirements. Other service charges have overachieved broadly in line with dwelling rents, reflecting the early letting of new dwellings as above.	(212)
	Other income	Includes underachievement of income from the General Fund for shared amenities of £436k following changes to recharge model – this will be investigated and any adjustments made in 2026/27.	506

Budget Line	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Expenditure	Repairs and maintenance	This significant additional expenditure is broken down as follows: £2.347m over budget on day-to day repairs. This reflects a deliberate response to increased damp, condensation and mould (DCM) demand. This combines the use of specialist external support to accelerate complex cases with investment in DCM works to support compliance, prevention, and a more robust end-to-end response. This is supported by the addition of two staff to strengthen initial response and operational oversight, along with improved systems and process controls to enable earlier identification, prioritisation and tracking of cases. These changes are improving operational control and supporting ongoing compliance with Awaab's Law. £1.536m overspend on asset management. This is due to Waking Watch arrangements in response to specific fire safety risks. The requirement has now reduced, with ongoing cover confined to a small number of sites. £1.479m overspend on Voids (voids is the term used for properties returned to the Council at the end of a tenancy). This reflects a high volume of voids returned in a poor condition during the year. Additional works were completed while properties were void to improve overall condition and support a more robust standard for re-letting. £1.431m overspend on Client and Third Party Repairs. This is result of a significant increase in insurance-related repair activity during the year, including major fire incidents within HRA properties. Costs relate to emergency response, reinstatement and follow-on works. The position is largely incident-led and therefore partly one-off, although the increasing complexity and value of claims presents an ongoing financial pressure. Actions in place and continuing into 2026/27 focus on strengthening cost recovery processes, improving visibility and control of uninsured expenditure, and targeted investment in compliance, fire safety and preventative measures to reduce future incident risk and associated financial pressures.	6.284m

Budget Line	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Expenditure (contd)	Repairs and maintenance (contd)	£586k underspend on overheads. Operational experience has provided greater clarity on cost drivers at the new Operational Hub, particularly energy and security, alongside one-off setup costs such as equipment and transitional business rates. This improved understanding has been fully reflected in the 2026/27 budget, ensuring a more accurate and robust financial position going forward.	
	Bad debt provision	Ongoing impact of rent regulation error refunds continues to affect the level of rent arrears and collection rates. Until a resolution is reached with DWP it will not be possible to write-off historic uncollectable arrears, therefore both the level of arrears and provision against these will continue to increase.	575
	Depreciation	Depreciation charges depend solely on the annual stock valuation and are therefore outside of the control of the council. Depreciation charges are transferred to the Major Repairs Reserve and used to fund capital repairs and maintenance within the council's existing housing stock.	393
Non-service expenditure	Net interest cost	Net financing costs are lower than budget due to capital slippage, which has reduced the borrowing requirement in year, along with the fact that the HRA has continued to borrow internally from the General Fund rather than externally. However, General Fund cash is now running low, and it is likely that some borrowing will need to be externalised in 2026/27 – this is taken into account within the HRA Business Plan.	(665)
	Revenue contribution to capital financing	The HRA Business Plan seeks to maximise revenue contributions to capital financing, in order to reduce the need for the HRA to borrow. However, service overspends elsewhere, as described above, mean that less money has been available for capital financing this year. This will have a direct impact on borrowing need, leading to increased interest costs in the future. This will be taken into account when the HRA Business Plan is next refreshed.	(6,423)

Budget Line	Service Grouping	Reason for Variance	(Under budget)/ over budget £'000
Non-service expenditure (contd)	Transfers to/(from) earmarked reserves	This represents amounts transfers to Repairs & Renewals reserves to pay for specific future capital works within the HRA estate.	183

Residential Social Landlord: Capital

The outturn position on the HRA capital programme is as follows:

Capital Outturn – Q4 2025/26	Final Budget £'000	Outturn £'000	Unspent budget carried forward £'000	(Under budget)/ over budget £'000
Housing Revenue Account				
Existing stock	41,618	24,468	16,093	(1,057)
New build and acquisitions	65,367	41,463	23,863	(41)
Other	3,284	2	3,282	-
Housing Revenue Account total	110,269	65,933	43,238	(1,098)

There is an overall underspend on the HRA capital programme, which has meant that no external borrowing has been needed this year. A total of £4.023 million of budget is requested to be brought forward from 2026/27 approved budgets to cover projects where expenditure has been quicker than anticipated. Budget totalling £47.261 million is requested to be carried forward into 2026/27 and subsequent years to allow projects to be completed.

The following individual projects have an underspend or overspend of over £50k, after taking into account budgets carried forward:

Project	Reason for Variance	(Under budget)/ over budget £'000
PVCu windows	The PVCu windows programme is of a significant scale and has not been fully completed due to access constraints. The total in-year underspend against budget was £1.541 million, of which a request has been made to carry forward £500k into future years.	(1,041)
Asbestos removal	Additional required work was identified during the year – some budget was brought forward from 2026/27 to cover this but the extra work has still resulted in an overall overspend.	131
Sulphite attacks	No spend was required against this budget during the year, and no spend is currently anticipated in the following year.	(109)
New build – Sackville Close	This project has now completed.	(65)
Other health and safety works	This is a contingency budget which was not required during the year.	(53)

Residential Social Landlord: Risk

The approach to risk is the same as for our general responsibilities, with the overall risk level as set out in the part one appendix.

There are no red or amber risks that relate specifically to our role as a residential social landlord.

Appendix 3: Treasury Management

The Council has a statutory responsibility to report its treasury management activity. In simple terms this sets out how we are managing our money, including our investments and our borrowing.

During the year to date, all treasury management activity has been carried out in line with the Treasury Management Strategy Statement as approved by Full Council in February 2025.

As this is the year-end report, full details of Treasury Management activity for the year will be reported to Full Council separately within the Annual Treasury Management Outturn report



Cambridge City Council

Annual Customer Feedback Report 2025 - 26

Appendix 4

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Appendix 4

Cambridge City Council's Annual Customer Feedback Report - Introduction

Every year Cambridge City Council publishes an Annual Customer Feedback Report, which gives an overview of the complaints and compliments the Council has received and how we have dealt with them (though we do not publish names or other personal details of people who have complained).

Cambridge City Council welcomes customer feedback, to help us to identify and address problems for customers, and to improve our services. This report shows how we have increased customer feedback about services and how we are responding to complaints.

Why we produce this report

- To learn from our mistakes so that we can improve our services.
- To encourage people who have cause to complain to make comments and suggestions to help us make these improvements.
- To be transparent about the complaints we've received, how we've responded to them and what we've done to try to put things right.
- To publicise and explain our complaints process.

Our Complaints Procedure

What is a complaint?

A complaint can be wide-ranging but can be defined as an expression of dissatisfaction with the service provided, or lack of action by the Council, or its staff. This can include failure to achieve specific standards of service.

It should be highlighted that issues brought to the Council for the first time, are dealt with as a request for service and so are not processed as a formal complaint. However, service requests can then escalate into a stage 1 complaint if the customer remains unsatisfied. This may occur from delays in response or dissatisfaction with staff behaviour or policies.

Customers complain to the Council if they:

- Are unhappy about something we have or haven't done.
- Are not satisfied with the way a member of staff has treated them.
- Are not happy with the way a councillor has treated them.

Cambridge City Council has a two stage complaints process:

Stage One: An issue raised by a complainant which is escalated beyond a service request for the first time.

Stage Two: Internal review of a complaint where the complainant is unsatisfied with the response to their initial complaint or the way in which the complaint has been handled, and they wish for their complaint to be considered further.

The **Local Government & Social Care Ombudsman (LGSCO) or Housing Ombudsman** is the final stage - the person affected must have gone through our internal complaints process before going to the LGO or Housing Ombudsman for an independent review.

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Complaints to Cambridge City Council in 2024-25: summary

Total number of complaints received

In 2025-26, the total number of complaints received was 959, which is an increase of 104 cases (12%) from the previous year's total of 855. When put into context with the amount of service requests and contacts made to the Council, (225,000), this accounts for less than 0.1% of contact received resulting in a formal complaint.

Proportion resolved at stage 1 and stage 2

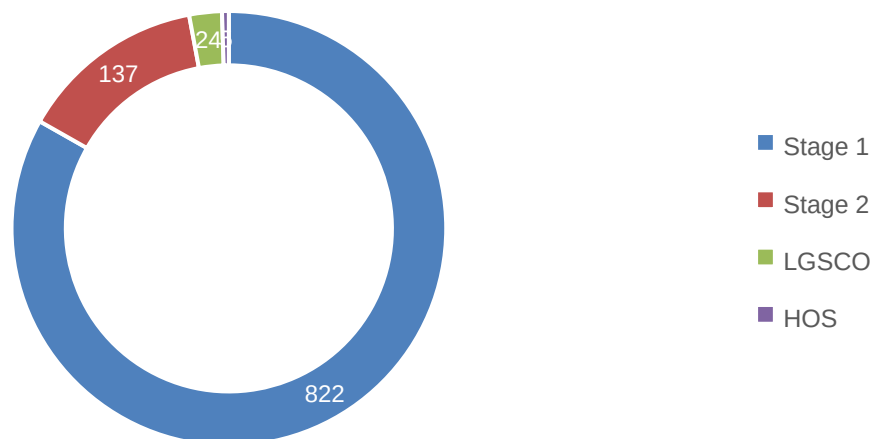
Of those 959 complaints, 86% (822) were resolved successfully at the first stage without need for escalation. This compares with 86% in 2024-25, and 90% in 2023-24.

137 complaints were escalated to stage two, which is 19 more than in the previous year.

Proportion resolved within the target timescale

Across all complaints submitted at both stages, 75% were resolved within the target time of ten working days. This represents a decrease on recent years, where 80% were responded to within time in 2024-25, and 72% in 2023-24. While the target is for 85% of cases to be answered within the target timeframe, several high-volume service areas exceeded this expectation. Greater Cambridge Shared Waste, City Homes, and Customer Services all responded to over 90% of cases within target time, with City Homes and Customer Services achieving 100% resolution.

Fig 1. Total Complaints received, by resolution stage



Stage 1	Stage 2	LGSCO	HOS
822	137	24	-

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Overview of complaint trends

331 (34%) of all complaints received by the Council were for the Housing Assets and Maintenance service, with the majority relating to Responsive Repairs (240). This is an increase from 264 complaints overall in the previous year. Other services that saw increases were Housing Advice whose complaints rose from 57 to 83, and Community Safety (Environmental Health) who saw their complaints rise from 16 to 34.

As with previous years, Housing Maintenance and Asset, and the Greater Cambridge Shared Waste Service received the greatest volumes of complaints.

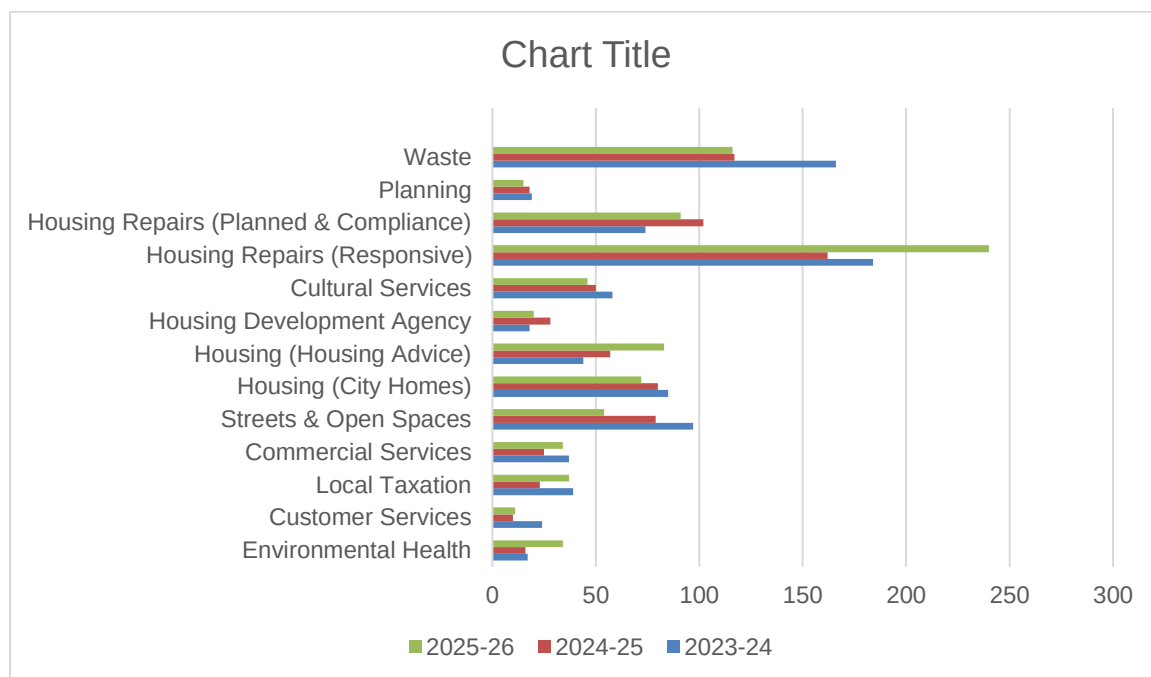
Responsive Repairs service saw the highest volume of complaints overall. With an increase of 78 more complaints compared to 2024-25. This increase was driven primarily by ongoing repairs backlogs, which led to delays and increased tenant dissatisfaction. This was compounded by sustained high demand for damp and mould cases following the introduction of Awaab's Law, with greater public awareness increasing both reporting levels and scrutiny of landlord response times. Service disruption during the transition to a new Damp and Mould contractor further impacted delivery timescales and customer communication, contributing to an increase of complaints to the service.

The majority of services across the Council saw either the volume of complaints received remain in line with the previous year, or slight increases. Customer Services, Shared Waste and Planning all saw their totals stay relatively close to last year. Other increases were in Environmental Health, Housing Advice, Local Taxation and Commercial Services, with the sharpest rises being in Environmental Health and Housing Advice.

The increase in Environmental Health was due to the expansion of the team to include Public Safety and Anti-Social behaviour, as complaints for that service were reported within a different service area last year. The Housing Advice service believe that the rise in the number of their complaints is due to greater visibility and awareness of the complaints process, and residents feeling empowered to use AI methods to assist them when raising concerns via this process.

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A visual comparison of complaints by higher volume services can be seen below.



Service	2023-24	2024-25	2025-26
Environmental Health	17	16	34
Customer Services	24	10	11
Local Taxation	39	23	37
Commercial Services	37	25	34
Streets & Open Spaces	97	79	54
Housing (City Homes)	85	80	72
Housing (Housing Advice)	44	57	83
Housing Development Agency	18	28	20
Cultural Services	58	50	46
Housing Repairs (Responsive)	184	162	240
Housing Repairs (Planned & Compliance)	74	102	91
Planning	19	18	15
Waste	166	117	116

Local Government & Social Care Ombudsman (LGSCO) and Housing Ombudsman

24 complaints were made to the Local Government Ombudsman. Of these, two cases were progressed to be investigated by the LGSCO, and one was upheld. 11 cases were closed following initial enquiries, and a further 11 were outside of the Ombudsman's jurisdiction.

For comparison, South Cambridgeshire District Council had 10 complaints raised to the LGSCO, 1 was investigated and upheld, 7 were closed following initial enquiries, and 2 were outside of the Ombudsman's jurisdiction.

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The Housing Ombudsman Service report for 2025-26 has not yet been distributed to the Council for inclusion in this report.

Reporting, monitoring and driving service improvement

The City Council's managers work hard to understand the reasons for the complaints, and where a consistent theme or issue has been established, they have taken action to prevent the poor service that triggered those complaints from being repeated. We continue to focus on delivering high-quality services to all residents and customers and welcome all feedback on our services and suggestions for improvement.

The Lead Complaints Officer has continued to review data on a regular basis to establish themes and trends. This data is reported on a quarterly basis to Service Managers to prompt reflection on what services need to do to improve, change or prevent a reoccurrence. Attention is focused on responding appropriately to complaints first time and providing outcomes to resolve complaints for residents. This reporting has led to some constructive discussions with Senior Management, and as a result we have been able to take feedback and apply it across many areas of the complaints process. An example of this was creating a template which guides the Admin Officer through everything that is required to be included in a complaint acknowledgement. This has increased the quality of acknowledgements being sent at both stages and ensures compliance with Ombudsman codes of practice.

Persistent and Unreasonably Persistent Complainants

Occasionally, when pursuing their complaint, complainants can become unreasonably persistent in a way that can hinder the way their complaint is investigated. This can include excessive repeat contact, which is not necessarily abusive or aggressive. In 2025-26 it was not necessary to impose restrictions on any customers. Any restrictions are made in line with the persistent and unreasonably persistent complainants policy.

Reporting on complaints about Council Policy

Where a complainant raises a complaint about a Council Policy, this will still be responded to under the complaints policy. If the complainant wishes to give general feedback or have a policy explained further, the Council will respond to this as an enquiry for service and provide an explanation or rationale behind the policy.

Should the complainant be dissatisfied with how the Council reached the decision on the policy or feel that an injustice has been caused by a policy, this would be investigated as a complaint. These complaints will then be considered when reviewing policies in future.

LGSCO and Housing Ombudsman Complaint Handling Code

The Council continues to assess our compliance with the Housing Ombudsman Service code of practice annually. Our complaints policy and handling guidance is based upon the code laid out by the Housing Ombudsman Service which is mandatory for all its members to follow.

Following our annual submission in July 2025 the Housing Ombudsman Service identified five areas where the complaints policy should be revised further. These were:

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- Removing a paragraph in section 2.2 of the policy relating to Housing disrepair claims. The wording made the policy confusing for residents wishing to pursue a disrepair claim, and highlighted in an earlier section of the policy that disrepair claims would only be refused if legal proceedings had begun
- Changing the language in section 4.2.1 which relates to incorporating additional complaints from the same resident into one complaint. The wording was amended to make clear that any new related additional issues would be treated as part of the stage 1 response, unless the stage 1 response had already been issued. If it had, the new issues would be treated as a new stage 1 complaint.
- Section 4.2.1 mentioned that we would ask residents why they felt their complaint remained unresolved and what they seek as an outcome from escalating to stage 2. Whilst this was only done to guide the Council at stage 2, it created a barrier where residents may have felt they had to answer these questions to escalate their case. This wording was removed as residents are not required to give reasons to escalate their complaint.
- Wording in section 4.2.1 amended to ensure residents know their complaints are logged as well as acknowledged at stage 2, and Council templates amended to reflect this.
- Amending the wording in section 4.2.2 to explain that a response at stage 2 would be provided within 20 working days. The Council policy states 10 working days at stage 2, which the Ombudsman acknowledged is within their expectations, but it was not clear that a final response would be sent within the 20 working day timeline.

After making these amendments, the Housing Ombudsman Service reviewed the Council's policy again, and advised that they were satisfied with our compliance with their code of practice at the end of February.

Complaints System Development

The Business Improvement Team within Customer Support have been developing a new module to the Council's complaints system. This system is designed to give customers a better journey and reduce frustration by signposting potential complainants to alternative avenues if their complaint is not within our jurisdiction. Since implementing in February, the system has identified and signposted 74 out of 293 cases to either the correct authority, or to raise a request for service if they had not already done so. This has been an improvement on the customers journey as it meant the customer was able to get to the right place to report their issue immediately rather than having to wait for the Council to contact them to signpost them to the correct route for resolution.

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How complaints were received

Year	Email	Web	Telephone	Face to Face	Letter
2025-26	9%	85%	5%	<1%	<1%
2024-25	9%	84%	6%	<1%	<1%
2023-24	7%	86%	5%	<1%	1%

The majority of complaints were received via a digital channel, predominantly via customers submitting their complaints themselves. 88% of complaints were logged by members of the public using the web form to report directly into the Council's Complaints Tracker, which is a slight increase from 84% last year.

The face-to-face customer service staff have continued to assist customers to self-serve using digital options. Seven complaints were submitted using this contact method, which is an increase of three compared to last year.

Compliments

In 2025-26 the Council received 87 compliments across all services via Case Tracker, which is a minor increase of 11 compared to 76 received in 2024-25.

However, some frontline services found that compliments were received directly to operatives or officers from residents. These have been mentioned in the service-by-service summaries where available.

Streets & Open Spaces received the highest number of compliments with 29. The majority relating to satisfactory completion of works, and compliments for staff members.

Officers are encouraged during training to formally record compliments as well as complaints, as managers had mentioned more than once that the number of compliments formally recorded was lower than expected. This is evidenced by only four compliments being formally registered on the case monitoring system, however a larger amount are received directly by Customer Services staff anecdotally following calls or appointments, and also via the customer satisfaction system.

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Customer Satisfaction Feedback System

Customer Support (Customer Services) operate a system to measure how satisfied customers were following their interactions with the team. Customers calling from a mobile number are automatically sent a text message at the conclusion of their call, unless they opt out. The message contains a link to a survey to leave feedback on the experience they had with the advisor who served them.

The Business Improvement team analyse the feedback gathered within these forms to identify potential improvements to the Customer Service offering within the centre.

Telephone	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Apr	Total	Percentage
Positive	285	244	242	273	241	278	282	264	201	203	205	275	2993	82%
Negative	61	51	43	72	58	68	50	56	33	41	53	57	643	18%

A link to the survey is also included within the signature for all emails that leave the Council's contact centre system, and there is a console in reception for customers to provide feedback, however the response rate for these channels is very low.

Email	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Apr	Total	Percentage
Positive	2	2	2	3	3	1	1	2	0	2	4	4	26	63%
Negative	0	0	2	0	4	2	0	2	2	0	3	0	15	37%

F2F	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Apr	Total	Percentage
Positive	1	0	0	3	3	0	1	1	1	0	0	0	10	100%
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0%

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Clarissa Norman, Customer Services Operations Manager:

In 2025 – 2026 we received 3687 customer satisfaction surveys compared to 3004 last year, an increase of 23%, all but 51 related to the contact centre.

2993, or 82%, of customers were satisfied with the service they had received from the advisor which is a slight decrease from 2024-2025 (85%). Customers identified Advisors in their feedback, and many gave heartfelt praise for the help and solutions the team gave them. The reduction in satisfaction can be attributed to longer wait times across the year due to the service having 6 simultaneous vacancies in the summer of 2025 and additional vacancies/absences throughout the year.

Managers in Customer Services review dissatisfied reports and their findings are that 4.5% of all customer responses about the level of customer service provided by the advisor were justified. In these cases, Managers addressed them with the Advisor, putting support or coaching in place as appropriate.

6% of dissatisfied reports were found to be unwarranted when investigated, managers found that customers responded negatively when the team are following process or were not able to meet their expectations.

Approximately 4% of respondents were dissatisfied with back-office teams processes or response times. This feedback is passed on to service managers for their consideration.

The feedback we are receiving is allowing us to better identify knowledge gaps/training needs for the team, improve our processes and update websites/information sources to give customers a better experience. In the past year as a result of feedback, we have:

- Changed a configuration in the contact centre system to improve call routing for all customers
- New hold music is being sourced
- Rectified issues in the parking permit process
- Updated broken web pages (exercise referral)
- Updated bulky collection web page with information about neighbourhood clean up's
- Improved signage in reception

Digital Options:

The customer satisfaction survey asks customers about their awareness of our digital options and why they chose to call/email/visit Customer Services.

In 2025 – 2026, 56% of customers stated they were aware of our digital options, in 2024-2025 the percentage was 52%.

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Customers reasons for calling:						
Year	Easier to Call	Prefer to speak to a person	Online not working/not available	Following up previous contact	Emergency	Other
2024 - 2025	16.8%	47.4%	19%	9.1%	7.7%	0
2025-26	4.8%	58%	16.1%	11.1%	2.3%	7.7%

Since we started gathering customer feedback our analysis has shown that over 50% of customers say that they are aware of digital options but still call the Council to speak to an advisor.

This feedback makes it clear that customers prefer to/ comment that it is easier to call and speak to an advisor - 58% of customers told us this was why they telephoned despite having knowledge of our Digital options, which has increased further from 47.4% in the previous year.

Online options not working or not available has reduced slightly to 16.1% from 20% of calls where customers knew about digital options.

Appendix 4

Service-by-Service Complaint Trends and Management Response

Each council department reviews the complaints and compliments it receives on a quarterly basis. This enables services to identify if there are any trends in the types of complaint being made or the services that complaints are being made about. As a result, changes can be made to services and how they are provided.

The next section of this report details comments from Services on actions they have taken to prevent, improve or change as a result of the feedback received in previous years. The total figure in the first column is the sum of Stage 1 and 2 complaints.

Complaints by sub-service are identified in the pie chart, this is how a service is broken down into the individual service request areas within. The bar graph displays resolution themes, or where these themes are too diffused and a trend cannot be identified, the bars will display root causes.

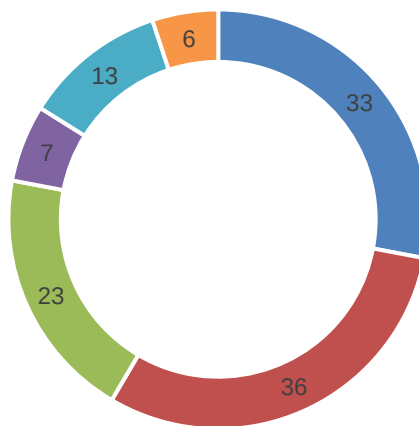
A resolution theme is the service specific content of the complaint (missed bin for example), whereas a root cause is a reason for the complaint which is generic across all services (service delivery failure).

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Greater Cambridge Shared Waste Service

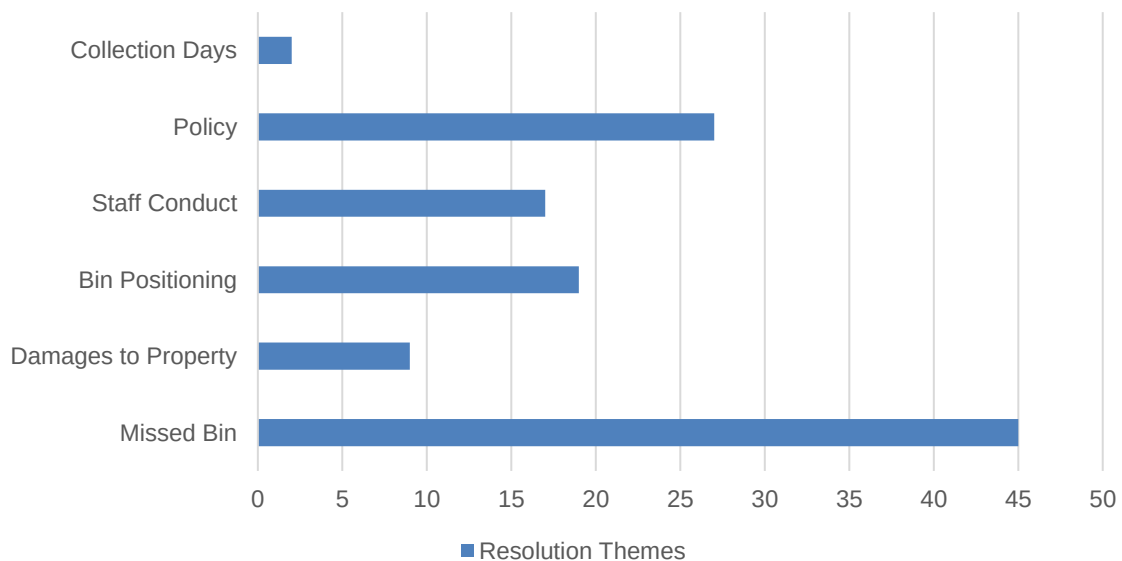
Waste	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	118	111	7	92%	7
2024-25	117	111	6	92%	7
2023-24	166	159	7	93%	5

Complaints by Sub-Service



■ Black Bins ■ Blue Bins ■ Green Bins ■ Collection Schedule Changes ■ Damages ■ Trade Waste

Resolution Themes



Appendix 4

Greater Cambridge Shared Waste: Service Comments

Natalie Thomas, on behalf of Bode Esan, Head of Greater Cambridge Shared Waste Service:

During 2025-26, the Shared Waste Service managed approximately 807,429 domestic collections per month, with households receiving an average of three bin collections per fortnight. The introduction of Wave 1 of the domestic food waste service from 27 January to March 2026 added the potential for a further 17,580 weekly collections, equating to approximately 79,110 additional collections per month during the initial nine week rollout period.

At present, the food waste service is achieving a 53% participation rate among properties that have received the new containers. It is anticipated that this figure will continue to rise as residents become more familiar with the new arrangements and expectations.

Approximately 37% of all monthly bin collections take place within the city area. Despite increasing demand and service expansion, the Shared Waste Service has maintained a consistently high performance level, achieving an average successful collection rate of 99.92%.

Over the course of 2025-26, the service also saw the addition of 1,121 new properties (excluding flats). Based on an average of three bins per household, this has resulted in approximately 3,363 additional collections per fortnight compared with the previous year.

Complaint volumes stayed in line with last year, and the proportion of responses issued within the target timeframe also stayed at 92%. The largest category of complaints remained missed bin collections, accounting for 36.5% of all complaints, although this represents a reduction compared with the previous reporting period. Of these missed collection complaints, 34.6% were assessed as unjustified or not upheld. Common issues included residents disputing crew reports, bins being only partially emptied, and repeat missed collections.

Other notable complaint categories included repeat missed collections (22%), assisted collections (7.3%), and disputed crew reports (2%). Complaints relating to assisted collections remained broadly in line with the previous reporting period and mainly concerned service delivery issues and repeated missed collections at eligible properties.

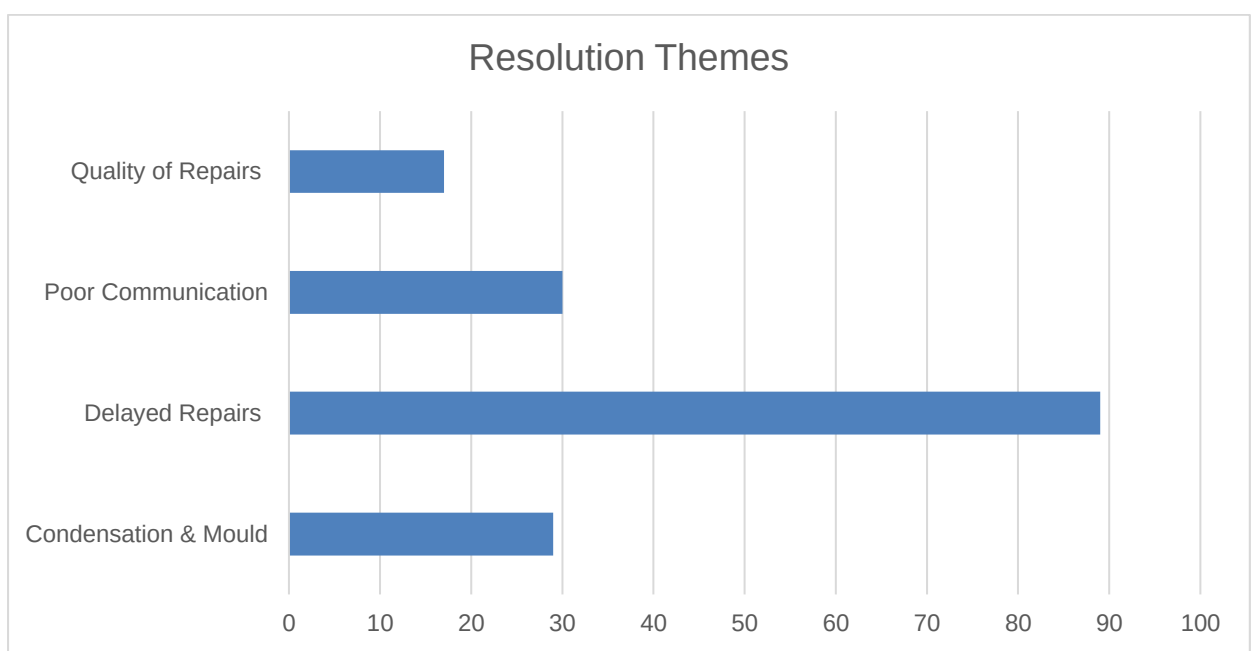
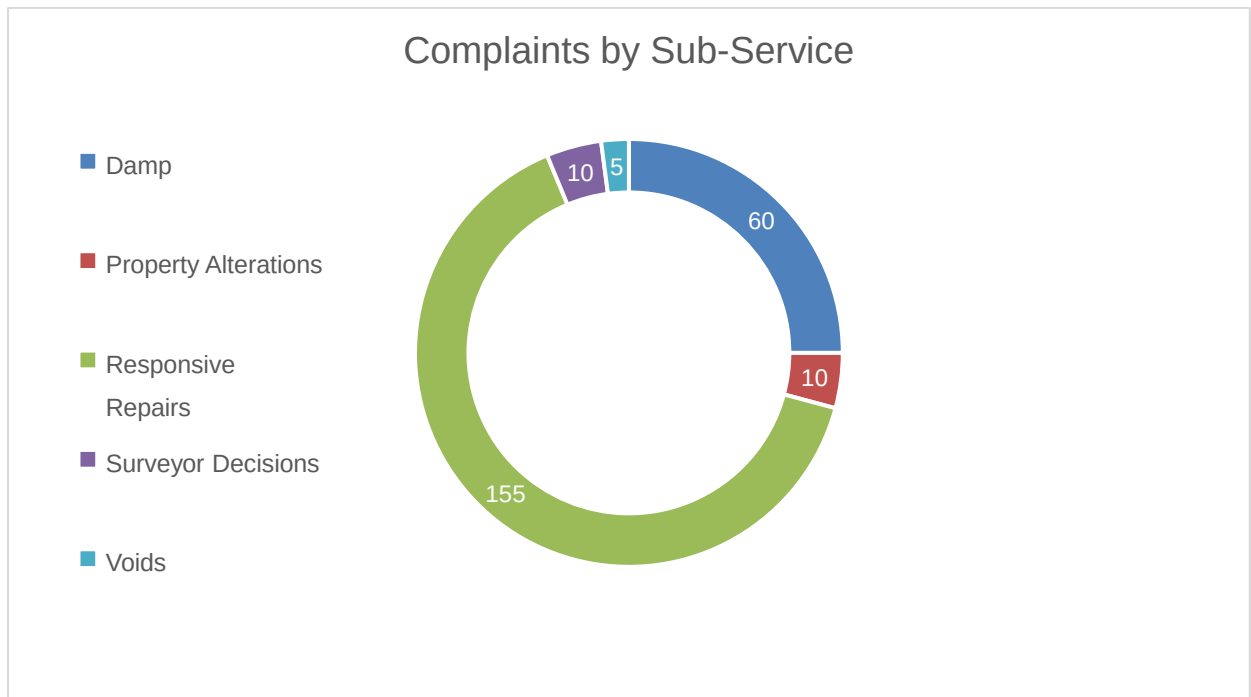
Six complaints related specifically to the new food waste service introduced in January. These complaints concerned both the policies associated with the service and reports of missed food waste collections.

Overall, the report highlights a service that continues to perform at a very high operational level despite increased demand, service growth, and the introduction of new collection arrangements. While complaint volumes have risen, performance remains strong, and many of the issues identified reflect the challenges of service expansion and changing collection requirements.

Appendix 4

Housing Maintenance: Responsive Repairs

Responsive Repairs	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	240	201	39	68%	14
2024-25	192	142	20	86%	9
2023-24	184	164	20	46%	



Appendix 4

Housing Assets & Maintenance - Service Comments

Brigitte Wilson, Delivery Assurance Manager & Senior Operations Manager

Over the past year, Housing Maintenance has experienced increased service demand and operational pressures, reflected in higher complaint volumes, increased Stage 2 escalations, and reduced performance against response targets compared to 2024/25. During 2025/26, the service completed over 15,200 repairs across both in-house teams and external contractors, with 240 complaints received, representing 1.58% of completed repairs.

Complaint volumes were influenced by repairs backlogs, increased tenant expectations and challenge regarding repair outcomes, and continued high demand for damp and mould cases following the implementation of Awaab's Law. Increased public awareness of the legislation has resulted in greater reporting and scrutiny of landlord response times and remedial actions.

The transition to a new Damp and Mould contractor during October 2025 also created short-term service disruption at a key regulatory point, with mobilisation taking longer than anticipated and impacting delivery timescales and customer communication. Internal capacity and system constraints further affected the service's ability to consistently provide timely updates and manage tenant expectations.

In response, the service has strengthened contract management and performance oversight arrangements, improved monitoring of backlogs and complex cases, and undertaken recruitment activity to improve operational resilience and administrative capacity.

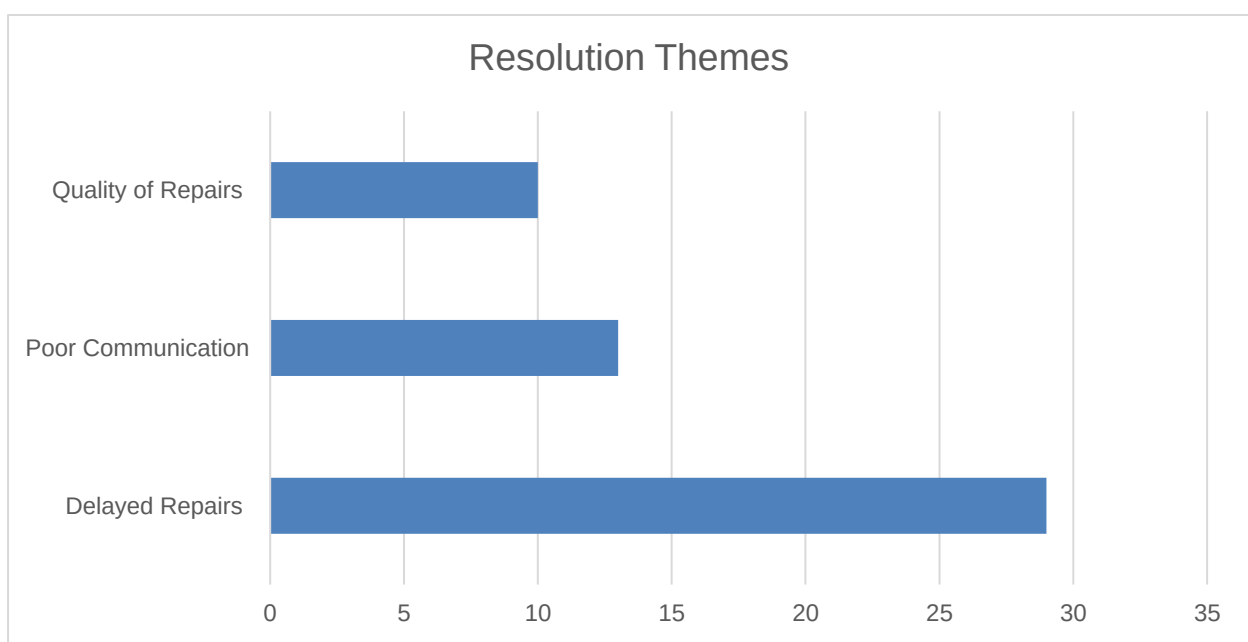
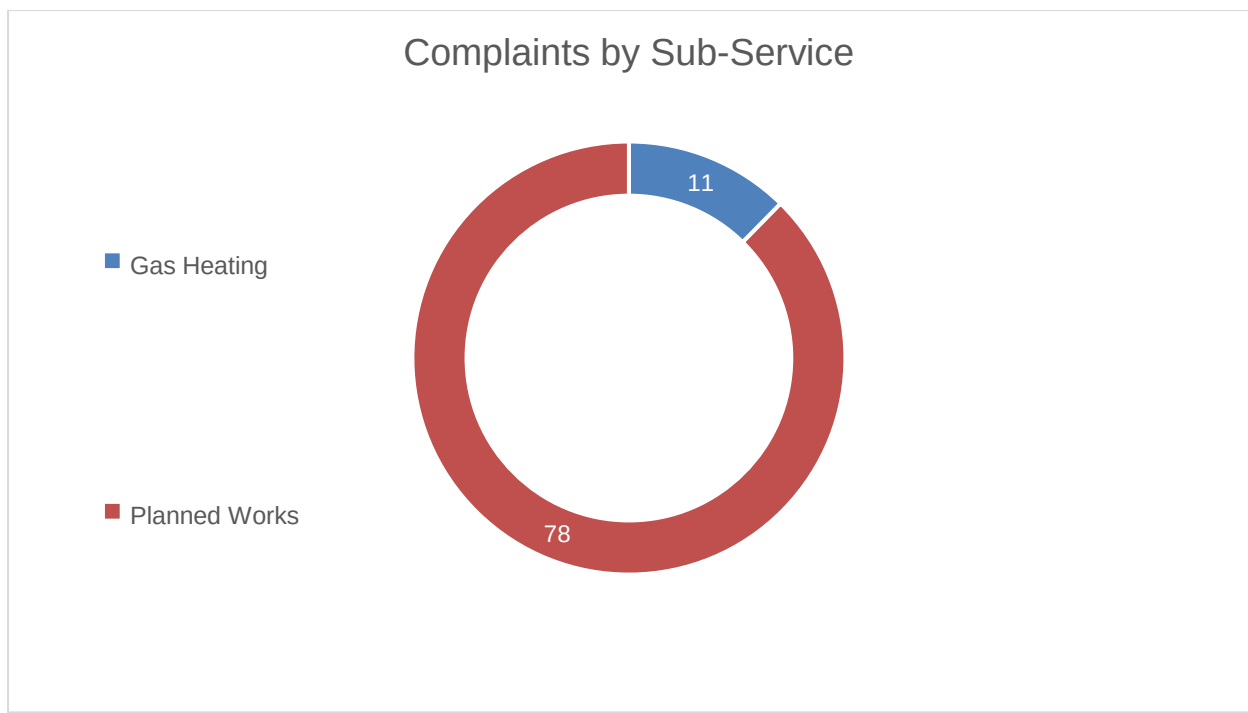
Looking ahead, the Council is preparing to procure new general repairs contracts with strengthened SLAs, KPIs and accountability measures. Improvements are also being progressed for tenant communications and to internal systems and processes.

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Appendix 4

Housing Maintenance: Planned Works & Compliance

Planned Works & Compliance	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	91	79	12	39%	3
2024-25	100	84	16	56%	1
2023-24	74	66	8	64%	2



Appendix 4

Planned Works & Compliance - Service Comments

Will Barfield, Asset Manager:

The Asset Management Team, in City Services Group are responsible for planned building maintenance and investment in the Council's housing stock and other buildings.

The Risk and Compliance team are responsible for ensuring building compliance for all building types, including gas servicing, electrical testing, asbestos management, fire risk assessment and legionella testing.

We carry out an annual programme of planned maintenance work across the Council's 7,600 homes, 1,200 leases, operational buildings, car parks and commercial properties. During the year 2025/2026 we completed over 2,500 planned maintenance jobs, 1,700 planned maintenance service inspections, 15,000 plus compliance-related inspections, and over 1,000 surveys and inspections to help us plan works and record the condition of property.

In 2025/2026 the total number of complaints was 91, a small reduction compared to 2024/2025. The number of complaints represents a small percentage of all services provided. The Council invested over £23m in the delivery of planned maintenance and compliance services in 2025/2026.

Many of our complaints are about things done by external contractors who are carrying out work for the Council – for example failing to keep people informed or not completing work as soon as expected. We collect customer satisfaction feedback from tenants who have received planned maintenance work, and this shows a consistent high level of customer satisfaction with maintenance work.

Where there are complaints about work carried out by contractors, we follow this up at contract meetings and expect the contractor to help resolve the situation, to ensure we minimise complaints in future.

In some cases there are delays between maintenance work being ordered, and work being completed and contractors not keeping residents informed. In 2026/27 we are introducing new performance measures to monitor the time between survey and installation of doors and windows to address this.

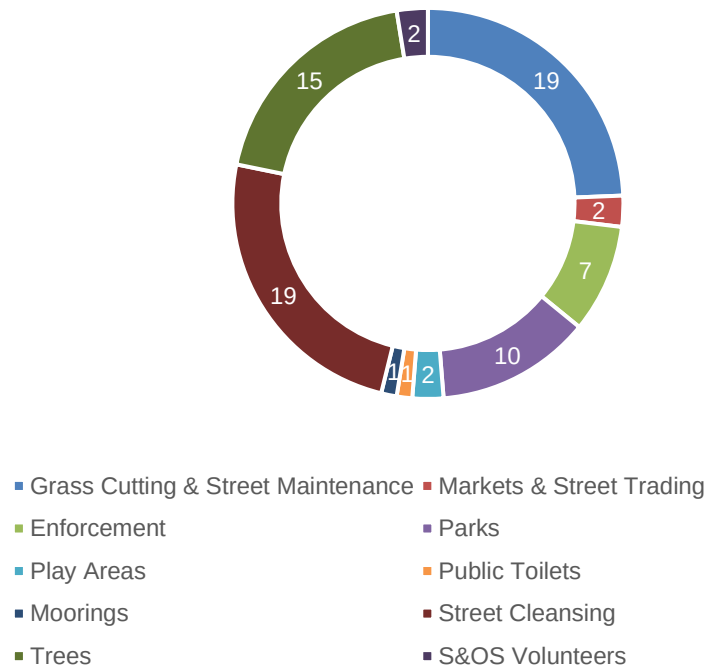
The number of complaints resolved in target time fell in 2025/2026. This is partly due to staff resourcing issues and the volume of work. The increased work demand has resulted in approval of four new full-time posts who will join the team in 2026/2027.

Appendix 4

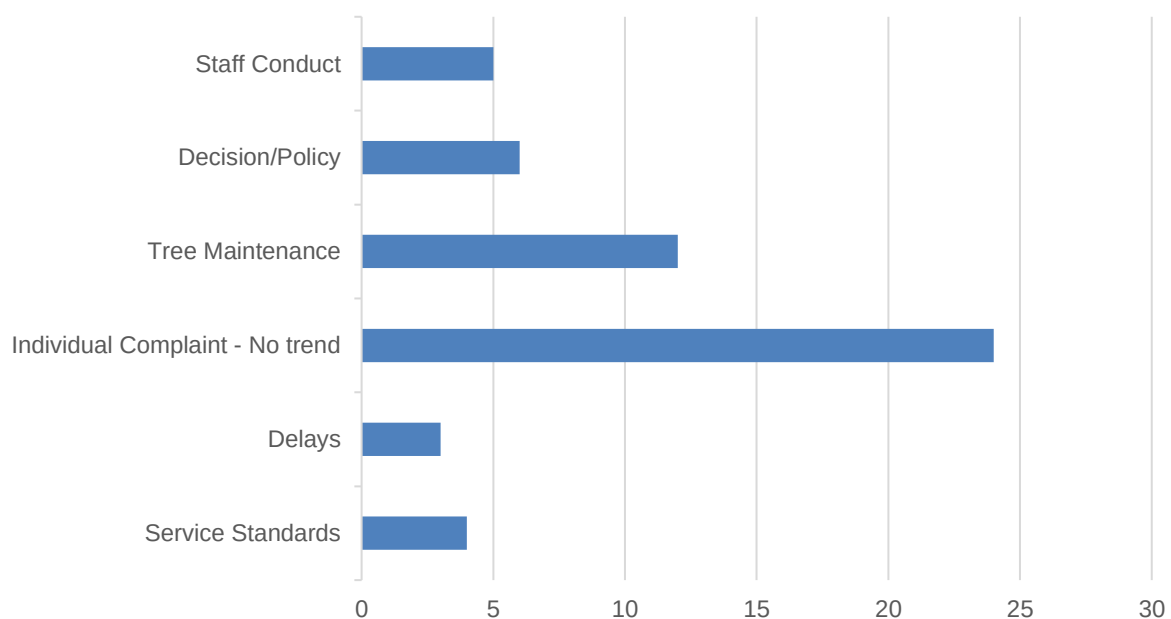
Streets & Open Spaces

Streets & Open Spaces	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	78	70	8	69%	26
2024-25	79	71	8	82%	13
2023-24	97	88	9	78%	21

Complaints by Sub-Service



Resolution Themes



Appendix 4

Streets & Open Spaces – Themes & Trends

Tony Stead, Business Improvement Manager:

Streets & Open Spaces received 78 complaints, which broadly consistent with the previous year (79 cases). This represents around 8% of the total 959 complaints received by the Council. The majority of complaints were managed at Stage 1, with just under 10% progressing to Stage 2, which remains broadly in line with last year's split, 70 Stage 1 and 8 Stage 2 compared to 71 Stage 1 and 8 Stage 2 previously.

The most common reasons for complaint were street cleansing, grass cutting, parks and open spaces, and tree maintenance, which make up the majority of complaints to the service and reflect the high-contact, visible nature of the service. A significant number of complaints were categorised as individual complaints, which is in line with previous years, and can be expected of a service that operates in the community where individuals complain about issues which may not be widespread.

In terms of root causes, the most frequently identified related to service failure, representing a substantial proportion of complaints, particularly in relation to missed or unsatisfactory services such as cleansing, grounds maintenance, or enforcement activity. This is again to be expected due to the nature of the service being delivered.

A small number of complaints related to procedures and planned works, especially in relation to tree maintenance and grounds works, where customer expectations may differ from operational approaches

The main actions coming out of complaints were advice/information being given (28 cases), apologies offered (14 cases) and follow-on service being provided (11 cases).

Performance against timescales was down to 69% from last year's 82%.

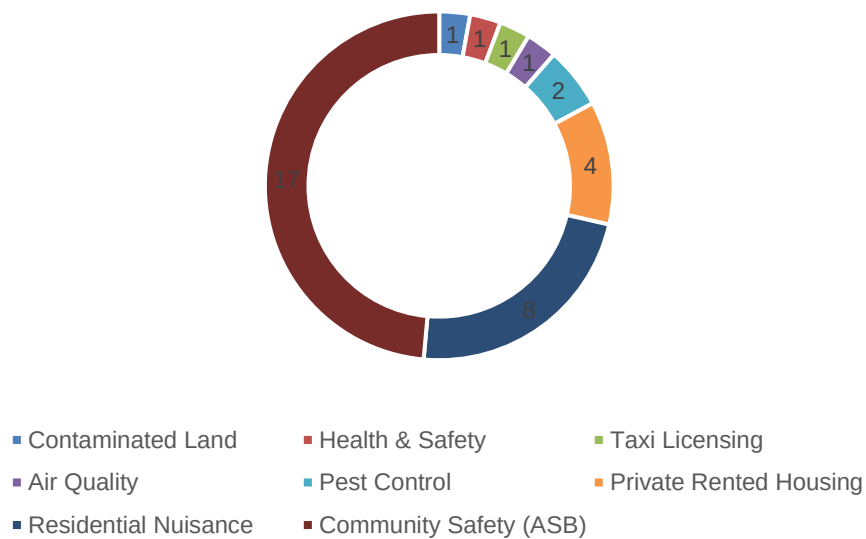
The service received 26 compliments via the customer feedback system which is double the amount received in the previous year.

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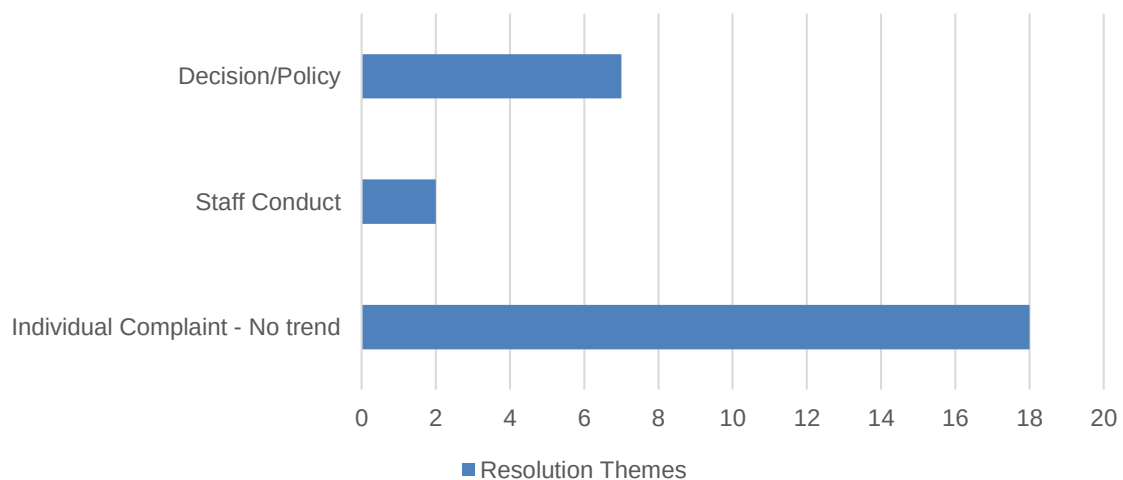
Environmental Health and Public Safety

Environmental Health	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	35	32	3	69%	3
2024-25	16	14	2	88%	
2023-24	17	16	1	82%	

Complaints by Sub-Service



Resolution Themes



Appendix 4

Environmental Health and Public Safety - Service Comments

Yvonne O'Donnell, Strategic Environmental Health and Public Safety Lead:

Environmental Health and Public Safety Team employs c52 staff and is responsible for taxi and premises licensing, food safety, health and safety and infectious disease control. The service also provides technical input to Planning on all aspects of EH, including air quality, noise and contamination. It also provides services to improve the private rented sector through education, enforcement, licensing of houses in multiple occupation and bringing empty homes back into use and energy efficiency. It also provides a pest control service. In 2025 /26 the Public Safety Team was transferred over the EH which amalgamated the ASB and Public Realm Enforcement Teams

Over the course of 2025/26, the EH&PS has delivered the following services:

- 693 Private Sector Housing Inspections
- 26 Empty Homes brought back into use
- 653 Food Safety Inspections
- 28 Licensing Inspections
- 500 Pest Control cases
- 938 Planning consultations
- 1626 Licensing Applications processed
- 3073 Service Requests, for EH including housing food safety health and safety licensing, taxis, noise nuisance
- 848 reports of ASB
- 629 Service requests for Public Realm Enforcement

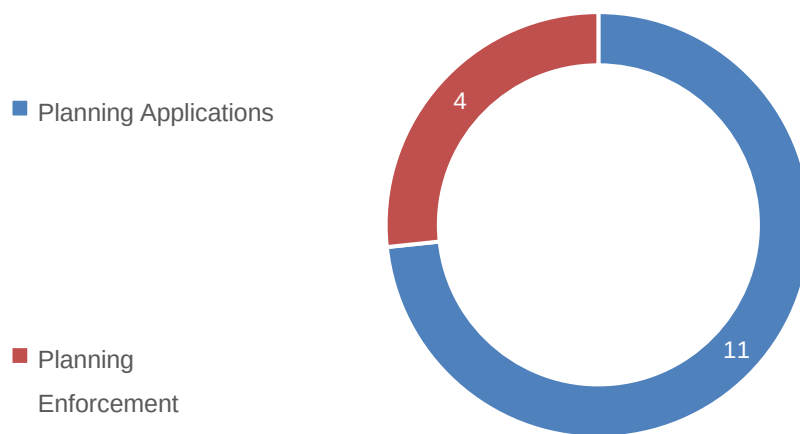
Despite the scale of operation and associated customer contact, as outlined above, the EH&PS service received a total of just 35 complaints in 2025/26, which is an increase from the previous years since the team has expanding to take on ASB and Public Realm enforcement . Of the 35 cases received, the service areas with the three highest numbers of cases were respectively: ASB (17) Noise (8) and Private Rented Housing (4). These figures are not considered significant and an analysis of each of the associated cases shows there was no particular complaint type or underlying causal theme.

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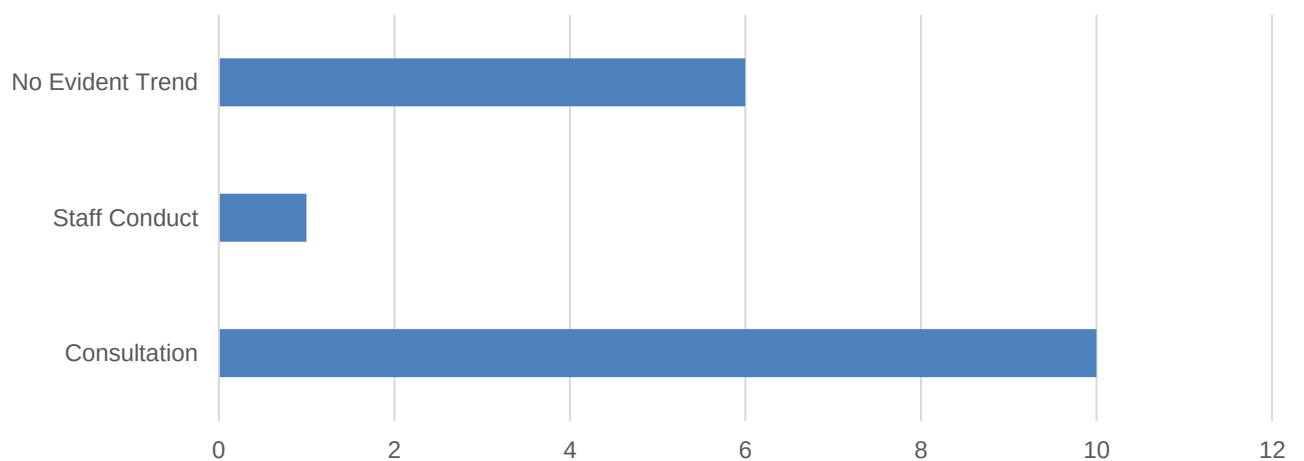
Greater Cambridge Shared Planning Service

Planning	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	15	12	3	93%	-
2024-25	18	14	4	83%	-
2023-24	22	17	5	68%	1

Cases by Sub-Service



Resolution Themes



Appendix 4

Greater Cambridge Shared Planning Service – Themes & Trends

Tony Stead, Business Improvement Manager:

Overall, Planning & Building Control received a lower volume of complaints compared to the previous year (15 compared to 18). The majority of complaints were handled at Stage 1, with only a small number progressing to Stage 2.

The most common subjects of complaint were Planning applications and consultation processes, which account for the majority of cases, particularly around how decisions are made and communicated. There were also a small number of complaints relating to planning enforcement.

Resolution themes included general communication issues and delays, particularly where customers disagree with planning outcomes or consultation processes.

Poor communication appears as a recurring secondary theme, particularly in relation to updates and response clarity.

The majority of complaints were resolved at Stage 1, consistent with organisational performance, with a reduced number of Stage 2 cases compared to the previous year, indicating improved early resolution. Outcomes were typically advice/information provided or not upheld, reflecting that many complaints relate to customer disagreement with planning decisions rather than service failure, with some cases resulting in apologies or upheld outcomes where communication issues were identified.

Performance against timescales was good and broadly in line with corporate performance, with an improvement compared to last year (from 83% within target to 93% this year).

Customer Services

Customer Services	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	11	10	1	100%	1
2024-25	10	9	1	100%	3
2023-24	24	22	2	100%	2

Service comments

Clarissa Norman, Customer Services Operations Manager:

In 2025-2026 Customer services handled in excess of 185,000 contacts via telephone, email and face to face and received 11 complaints, one more than in 2024 -2025. Complaints continue to be very low in relation to the amount of contacts the team receive, 0.006%.

The low numbers of complaints can be attributed to the training and coaching Customer Service Advisors receive and the positive behaviours they demonstrate when assisting customers; Customer Service Managers acting responsively on customer feedback and taking actions to remedy or mitigate any negative feedback received from customers, including passing any feedback that relates to back-office processes to the appropriate service manager for them to act on.

The Service continues to send customer satisfaction surveys to every customer that has contact with the team. The survey is attached to email footers, is available on a tablet in reception and is also texted to all customers who speak to an advisor. In 2024-2025 85% of customers said that they were satisfied with the service they received. In 2025 – 2026 Customer satisfaction was 82%

For the fifth year running 100% of complaints received in Customer Services were responded to within target and for the second year, only one complaint was escalated to stage 2.

In 2025-2026, 54% of the complaints submitted were not upheld, 36% were upheld and 10% were partially upheld, with only one complaint being escalated to stage 2 this indicates that customer service managers are listening and acting on complaints/feedback effectively.

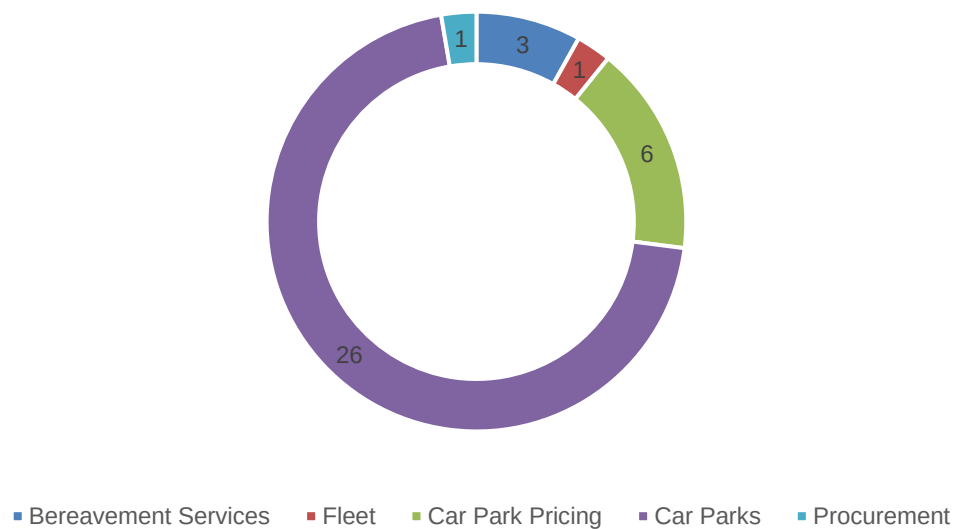
With the number of complaints received, trends could not be identified.

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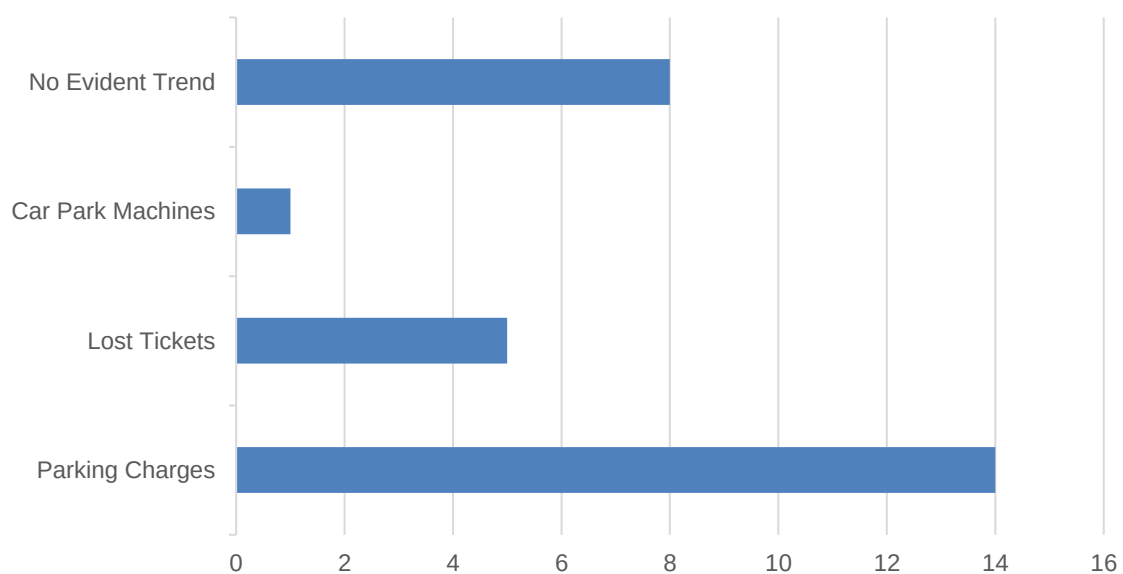
Commercial Services

Commercial Services	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	36	29	7	54%	-
2024-25	25	19	6	48%	-
2023-24	37	26	11	78%	5

Cases by Sub-Service



Resolution Themes



Appendix 4

Commercial Services – Themes & Trends analysis

Tony Stead, Business Improvement Manager

The data indicates that complaints continue to be predominantly associated with Parking Services, with only a small number relating to Bereavement Services and other Commercial Services areas.

Key themes

The majority of complaints relate to car parking charges, including a recurring issue concerning lost ticket charges, which remains a consistent source of dissatisfaction.

A smaller number of complaints relate to car park cleanliness, machine issues, and isolated service concerns, though these do not represent significant trends.

There are also a number of cases categorised as non-CCC or non-actionable, suggesting some customer expectations fall outside of service responsibility.

Decisions and policies are the primary root cause of complaints, accounting for the largest proportion of cases. This reflects challenges in customer acceptance or understanding of charging structures and associated rules. Secondary causes include delays and communication issues, though these appear less frequent and no trend can be established across these cases. A very small number of complaints relate to service delivery failures or procedural issues, indicating that operational performance is not a concern.

The majority of complaints were resolved at Stage 1, with only a limited number escalating to Stage 2. Outcomes were typically advice/information provided or no further action required, with some instances of financial redress or apologies where appropriate.

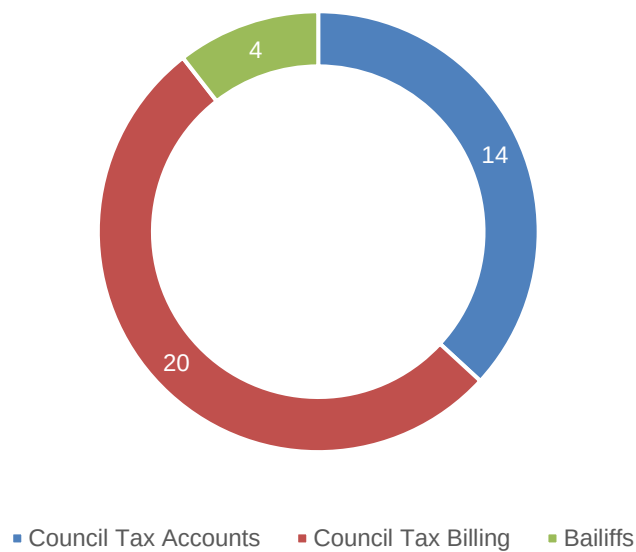
The data suggests that complaints are largely driven by policy-related dissatisfaction rather than service failure. Recurring themes around charges and lost ticket processes indicate an opportunity to improve communication, transparency, and customer understanding. Continued focus on clear messaging and early resolution is likely to reduce escalation and improve overall customer experience.

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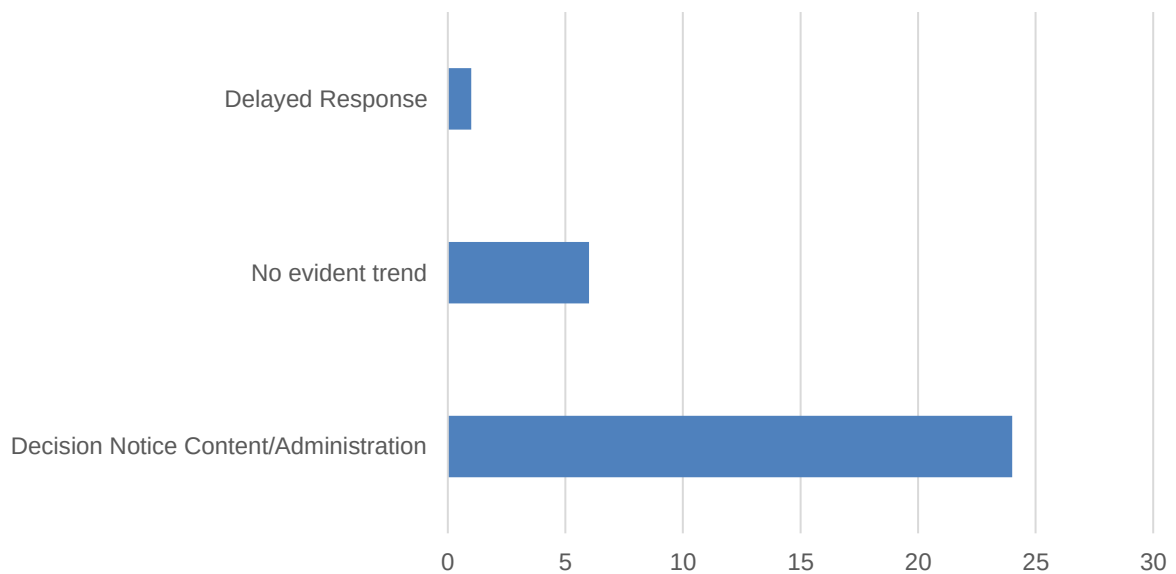
Local Taxation

Council Tax	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	38	35	3	84%	2
2024-25	23	20	3	96%	5
2023-24	39	39	-	100%	2

Cases by Sub-Service



Resolution Themes



Appendix 4

Local Taxation – Themes & Trends Analysis

Tony Stead, Business Improvement Manager:

Council Tax Services received 38 complaints in 2025-26. The majority of cases were resolved at Stage 1, with only a small proportion escalating to Stage 2, indicating that complaints are generally being resolved at the first stage.

The most common subjects of complaint were Council Tax billing and decision notices, with complaint themes focusing on accuracy, clarity, and understanding of bills, as well as disputes over liability or charges.

Delays and accessibility issues – including difficulty contacting the service, response times, and dissatisfaction with the speed of resolution

Other, less frequent themes include bailiff activity, online system challenges, and customer dissatisfaction with service delivery, though these are so few in numbers we cannot establish a trend across these complaints.

The main root causes for complaints across the service related to decisions or policies. A significant proportion of complaints were raised from customers disagreeing with how the Council made decisions, particularly around billing, recovery, and liability.

Delays and poor communication were a secondary factor, and highlighted dissatisfaction where customers felt unable to access timely or clear information

The majority of complaints resulted in advice or information being provided, reinforcing that many issues relate to customer understanding rather than service failure. A notable proportion resulted in apologies, particularly where delays or communication issues were identified.

There are multiple “not upheld” outcomes, particularly where decisions are policy-based, further supporting the trend that complaints are often rooted in customer disagreement rather than error

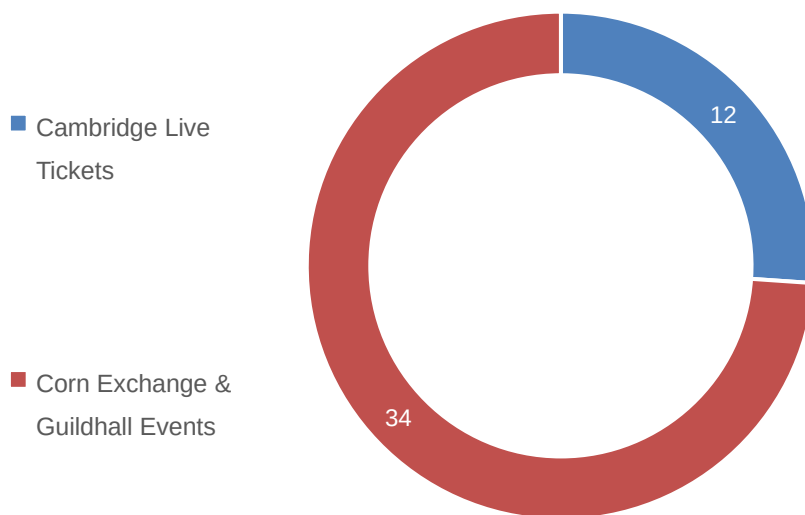
84% of responses to complaints were delivered within the target 10 working days. Although this is high, there was a slight decrease when compared to last year, particularly at Stage 1, indicating some inconsistency in performance.

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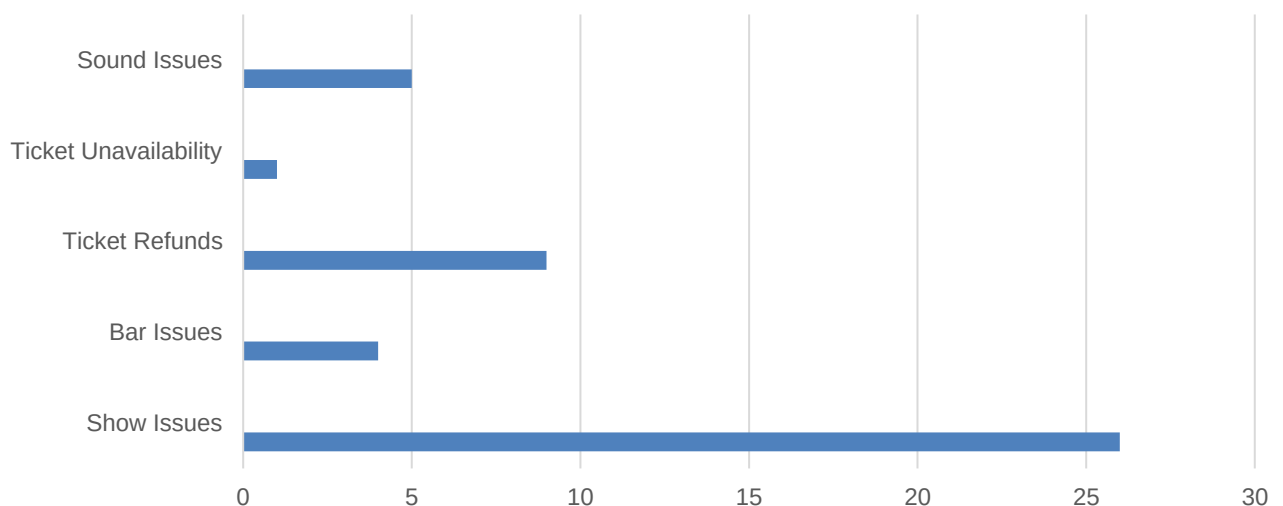
Cultural Services

Cultural Service	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	46	38	8	78%	2
2024-25	50	45	5	58%	3
2023-24	58	51	7	36%	3

Cases by Sub-Service



Resolution Themes



Appendix 4

Cultural Services – Themes & Trends Analysis

Tony Stead, Business Improvement Manager:

Overall, Cultural Services 46 complaints, down from 50 in the previous year. The majority of complaints were handled at Stage 1, with 8 progressing to Stage 2.

The most common subjects of complaint were show-related issues, including sound quality and restricted views, which form a key theme across multiple cases. Ticketing and refunds, including dissatisfaction with availability, booking issues, or refund processes were also highlighted. A small number of cases related to experiences with audience members and the experience at the Corn Exchange, including behaviour of other attendees and bar-related concerns.

In terms of root causes, the most frequently identified were customer experience factors such as sound quality, seating and audience behaviour, which often fell outside of the service control. Alongside these, a number of third-party (contractor) issues were recorded, which particularly related to technical delivery (such as sound provided by non-venue staff). There were a small number of cases linked to communication issues and policies, particularly around refunds and ticketing terms

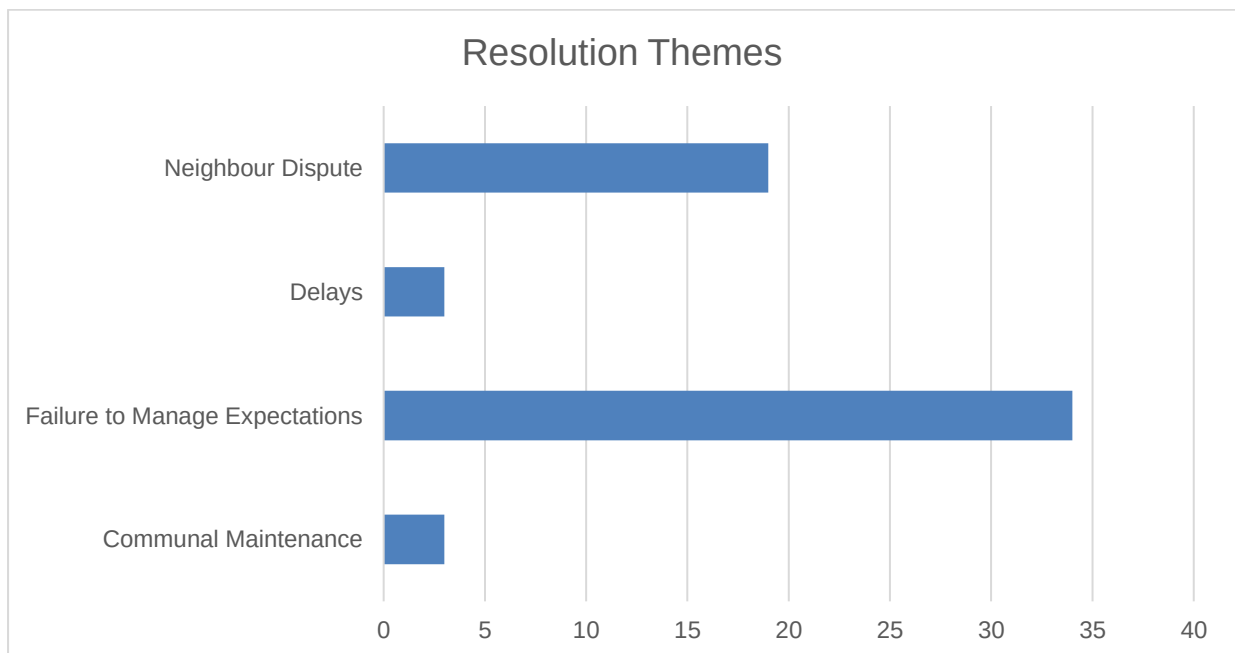
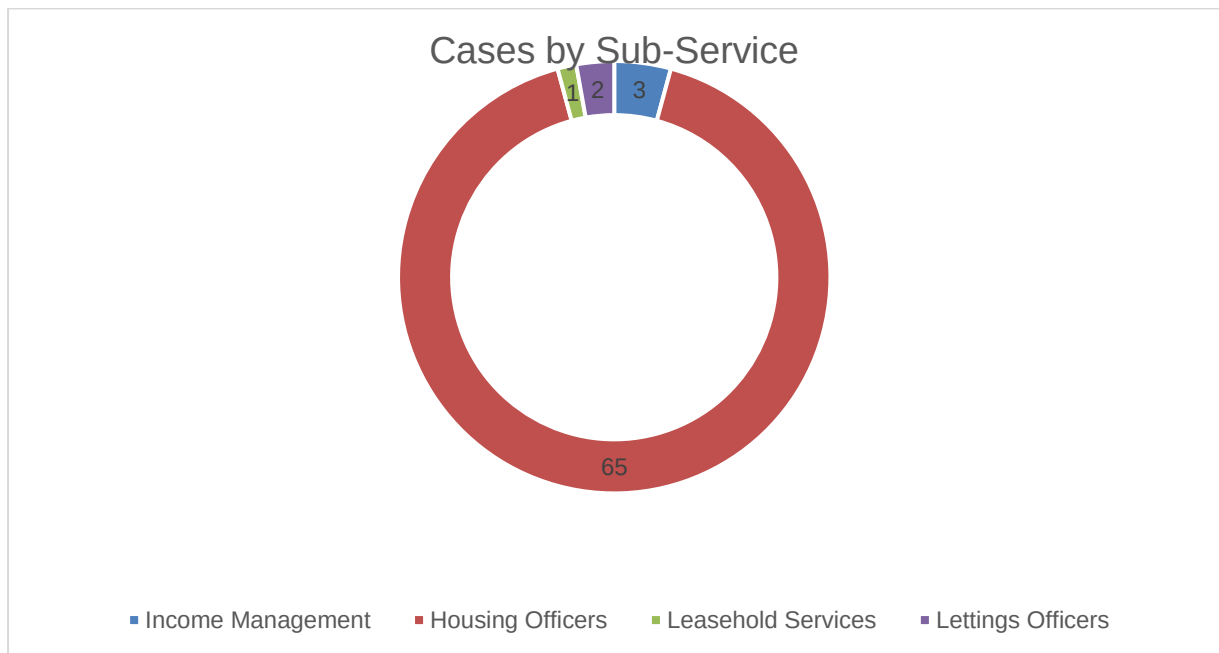
The majority of outcomes recorded were apologies, with smaller numbers resolved through advice/information being given, reviewing communication, or in a small number of cases, issuing ticket refunds.

Performance against timescales was mixed, with a combination of responses within target and a number of missed deadlines, particularly in Stage 2 cases.

Appendix 4

Housing Management (City Homes)

Housing Services	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	72	57	15	100%	4
2024-25	80	67	13	96%	2
2023-24	85	74	11	89%	3



Appendix 4

Housing Management (City Homes) – Service Comments

Anna Hill, Strategic Housing Management Lead:

We observed a reduction in the number of complaints received by City Homes during 2025–2026 compared to the previous two years. However, the top two complaint themes remain unchanged:

- Neighbour Disputes – 19%
- Failure to Manage Expectations – 34%

It's important to note that the overall number of complaints remains low relative to the size of our customer base. With a combined housing stock of 8,873 tenants and leaseholders, only 0.8% of customers submitted a complaint, compared to 0.9% in 2024-2025. We resolved 100% of complaints within target.

Of the complaints received:

- 17 were upheld
- 16 were partially upheld
- 39 were not upheld

14 complaints relating to the failure to manage customer expectations were upheld or partially upheld, but only one complaint relating to a neighbour dispute was upheld.

We experienced unforeseen significant resource issues in the team during 2025-2026, which impacted our ability to manage customer's expectations. To prevent this happening again in the future, it was agreed in the budget setting process to increase the resource in the team during 2026-2027.

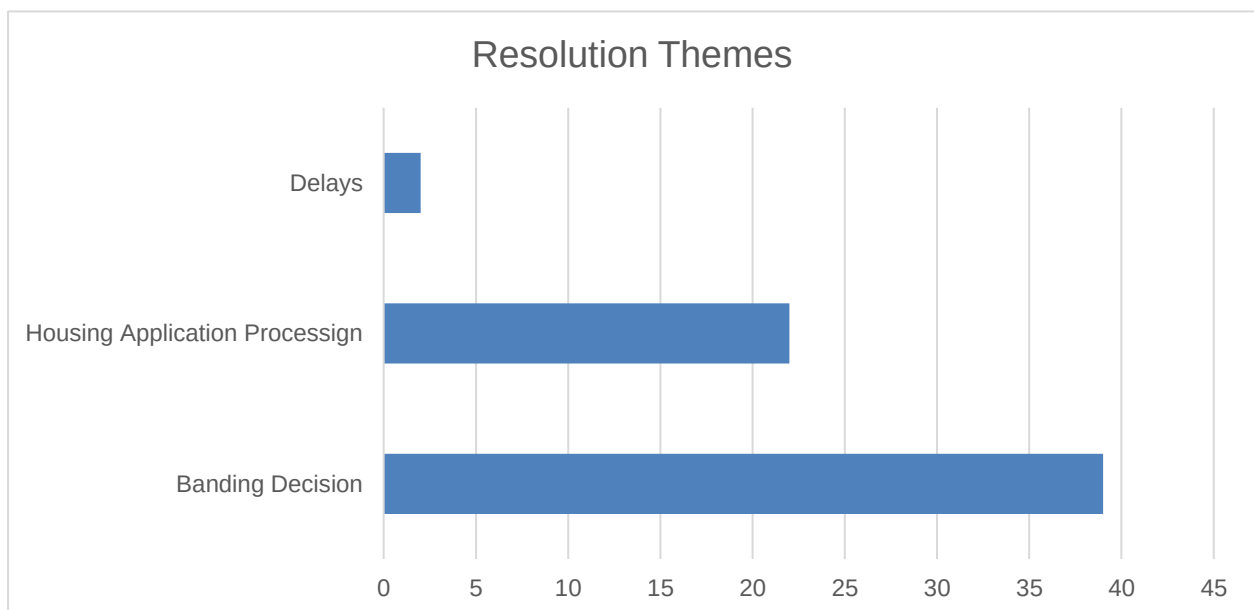
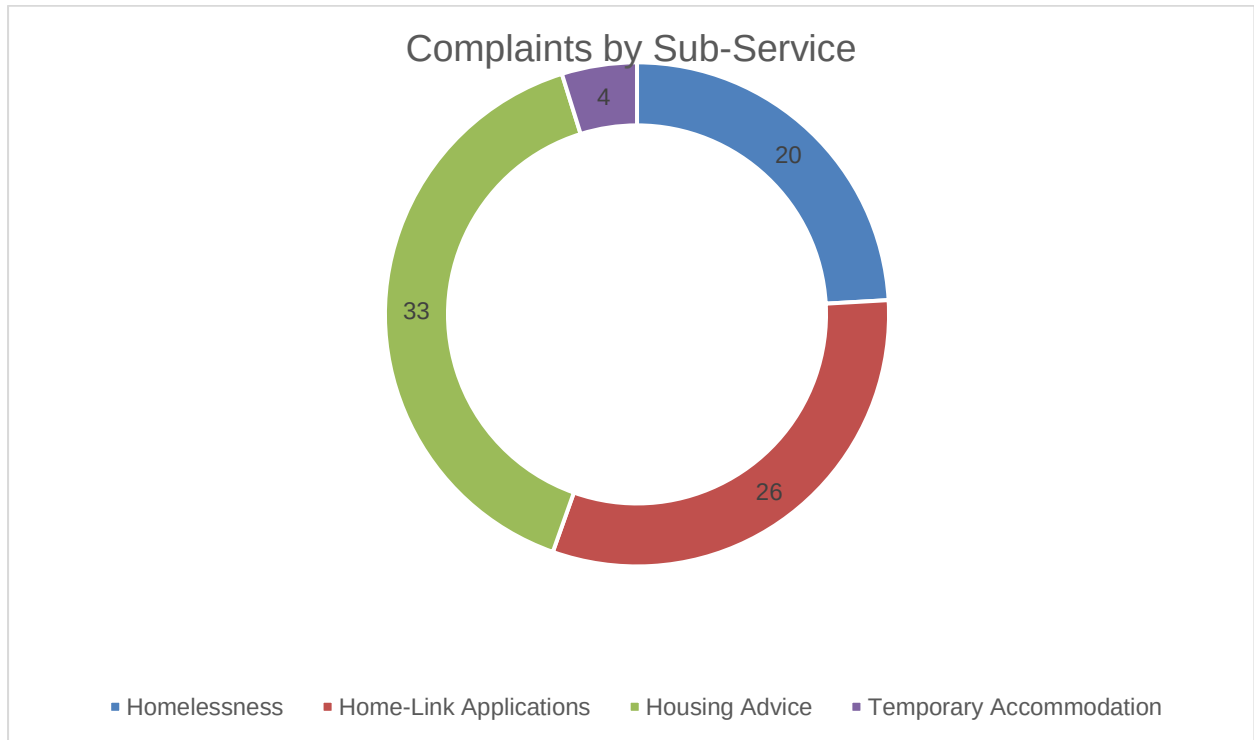
Some of the key recommendations for improvement are:

- Continue targeted feedback and coaching for staff involved in upheld complaints
- Ensure robust training is provided to new members of staff recruited

Appendix 4

Housing Needs & Options Services

Housing Services	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	83	59	24	83%	-
2024-25	53	42	11	85%	23
2023-24	44	40	4	87%	8



Appendix 4

Housing Needs & Options Services – Service Comments

Simon Hunt, Housing Services Manager:

The number of complaints received increased by 53% from 53 to 83. The proportion of complaints escalated from stage 1 to stage 2 increased slightly from 21% to 28%.

It should also be noted that we received 23 compliments about the service in 2024/25, compared to 8 the previous year.

83% of complaints were responded to within target, which is a slight decrease compared to performance for last year.

Within the context of service delivery, the Housing Advice team supported over 2,500 customers in the past year across both housing advice and homelessness cases. When viewed against this volume, the cumulative number of complaints represents approximately 2% of customers. Similarly, for Home-Link, with around 2,500 applicants on the housing register, the 26 complaints received equate to roughly 1% of applicants. This provides important context, indicating that while complaints have increased, they remain proportionally low relative to demand.

In terms of the reported rise in complaints, particularly within Housing Advice, it is possible that this reflects how cases are recorded rather than a distinct increase in service issues. Homelessness and Housing Advice are often closely linked in practice, and there may be some interchangeability in how complaints are logged on Tracker. As a result, complaints relating to homelessness cases may also be contributing to the apparent increase under the 'Housing Advice' category.

Alongside this, there has been an observable shift in the nature of complaints received over the past year. Anecdotally, the service has seen more complaints that appear to be drafted using AI tools. These are often identifiable through consistent formatting, similar phrasing, and the inclusion of standardised expectations, remedies, and references to legislation. In some cases, the legislation cited is not directly relevant to the complaint, suggesting it may have been generated as part of a more generalised AI-assisted approach to raising concerns about access to social housing.

Taken together, this may indicate that the increased use of AI is empowering customers to feel more informed and confident in submitting complaints, which could be contributing to the overall rise observed

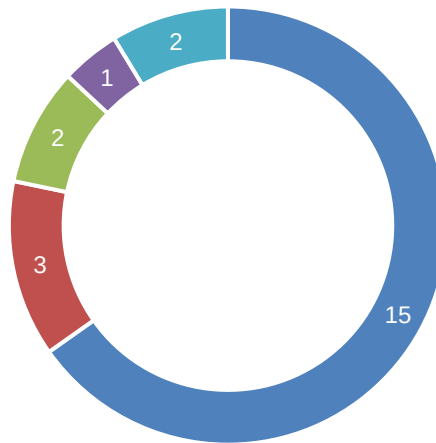
Appendix 4

Housing Development Agency

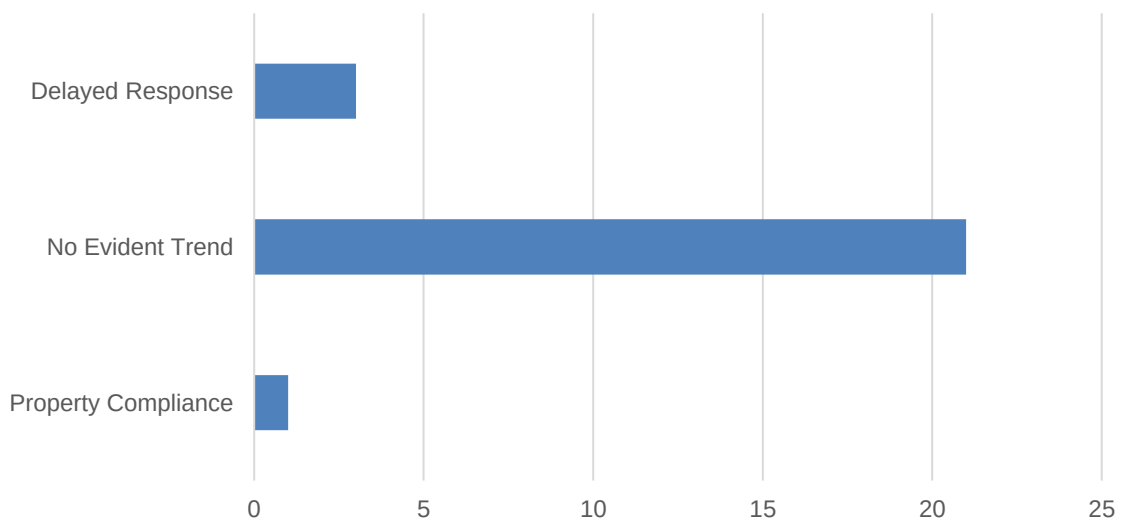
HDA	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target	Compliments
2025-26	21	18	3	95%	-
2024-25	28	20	8	79%	-
2023-24	18	15	3	50%	-

Root causes

- Contactor failure
- Poor Communication
- Decision/Policy
- Delays
- Procedures



Resolution Themes



Appendix 4

Housing Development Agency – Themes & Trends

Tony Stead, Business Improvement Manager:

Overall, Housing Development Agency received a reduction in complaints compared to the previous year (21 compared to 28). The majority of complaints were handled at Stage 1, with only a small number progressing to Stage 2, representing a notable decrease in escalation compared to last year (3 compared to 8).

The majority of complaints made to the service were classed as general individual complaints with no evident trend, indicating issues remain largely case-specific. Other themes included property issues, communication concerns and delays, though these were limited in number.

In terms of root causes, the most frequently identified were third-party (contractor) failure, although a small number of cases also related to poor communication and delays.

Outcomes were typically advice and information provided, with some instances of service improvement actions and apologies where appropriate. Performance against timescales was consistently good and improved compared to last year (95% compared to 79%).

Appendix 4

The following services have not been reported on in detail due to the low number of complaints raised within them. However, a brief summary of performance is provided.

Commercial Property Services

Property Services received one stage one complaint and two stage two complaints. All three complaints were resolved within their target dates.

Elections

One stage one complaint was received relating to Elections this year. It was resolved within target.

Housing Finance

Housing Finance received one stage one complaint. It was resolved within target.

Active Lifestyles

Two stage one complaints were received relating to the Active Lifestyles team. Both were responded to within the target time.

Estate Services (formerly Estate Champions)

Estate Services received 11 complaints this year. 8 at stage one, and 3 at stage 2. All of the stage one and 2 of the stage two complaints were resolved in time.

Housing Benefit

Housing Benefit services received one complaint at stage one this year. It was resolved within the target time. This service received three compliments.

Information Governance

Two stage one cases were received relating to Information Governance this year. Both of the cases were resolved within the target time.

Finance

Finance received one complaint at stage two this year. It was not resolved within the target time.

Community Centres

Three complaints were received at stage one that related to Community Centres. One was resolved within the target time, and two were not.

Cambridge Home Improvement Agency

Six complaints were received at stage one for CHIA. Four of these were responded to within target time, and two were not.

Appendix 4

Multi-Service Complaints

Multi-Service Complaints	Total Complaints	Stage 1 Complaints	Stage 2 Complaints	Complaints in Target
2025-26	44	34	10	80%
2024-25	47	41	6	70%
2023-24	41	36	5	83%

Multi-Service complaints tend to be more complex and involve more officer time to investigate, which in previous years has contributed to a low number of complaints responded to within target. This year the number of cases resolved within target has remained consistent with the previous two years which shows Officers are still handling these cases efficiently.

There were three fewer multi-service complaints in 2025-26 than in 2024-25.

This year the area with the highest number of multi-service complaints was City Homes with 25, compared to 17 in the previous year. Other high-volume areas involved in multi-service complaints are Housing Maintenance (11, up from 8), and Streets & Open Spaces (8, the same as last year). This is in-line with previous years, as Housing Maintenance & Assets complaints, and other community issues can often involve officers from the Housing service if the complaints concern decisions made by that service. The majority of the multi-service complaints involved a Housing Service as complaints had often been raised to a Housing Officer initially, but they have had to involve other services to find a resolution for the complainant. An increase in multi-service complaints being responded to within target shows that staff are working collaboratively to resolve cases which span multiple services.

The Customer Service Centre is often the first point of contact for the majority of services offered by the Council. We are still careful to differentiate where the complainant actually complains about the service they received from the CSC, or if they are just mentioning the fact they were in contact with them as part of the background to their complaint. There were only two Multi-Service complaints which were also unhappy with the service they had received from the CSC this year.

When a multi-service complaint is allocated, potential case owners from all services involved are contacted to establish a lead officer who will then co-ordinate an investigation and response, including input from all relevant services.

Appendix 4

Local Government and Social Care Ombudsman (LGSCO)

If customers are not satisfied with the way their complaint has been handled they can contact the Local Government and Social Care Ombudsman's office. The LGSCO investigates complaints of injustice arising from maladministration by local authorities and other bodies.

In 2025-26, 24 complaints about our services were raised with the ombudsman. Of these 24 complaints, 11 were outside of the ombudsman's jurisdiction, and a further 11 were assessed and closed. 2 cases were investigated, and both cases were upheld.

This is a slight increase on previous years. In 2024-25 there were 16 complaints raised with none investigated. In 2023-24, 17 cases were raised, 1 was investigated and upheld.

Comparing to similarly sized councils by population for 2025-26, Norwich City Council had 39 complaints raised, 20 assessed and 4 investigated, which were all upheld. Oxford had 33 cases raised, 13 assessed, 3 investigated, all of which were upheld.

Department	No of Complaints Received	Decision
Benefits & Tax	1	1 Closed after initial enquiries
Housing	12	2 Incomplete/Invalid 4 Closed after initial enquiries 3 Referred for local resolution 3 Advice given
Corporate & Other Services	5	3 Closed after initial enquiries 1 Referred back for local resolution 1 Advice given
Environmental Services & Public Protection & Regulation	3	1 Upheld 2 Closed after initial enquiries
Planning & Development	2	1 Upheld 1 Incomplete/Invalid
Highways & Transport	1	1 Closed after initial enquiries
Total	24	2 Upheld 11 Closed after initial enquiries 4 Advice Given 4 Referred back for local resolution 3 Incomplete/Invalid

Appendix 4

LGSCO Upheld Case summary

The LGSCO provides information on all cases submitted and investigated on their website. Summaries have been provided below, full information on each case can be found on the LGSCO website by searching for the reference number.

Planning Applications

Complaint: 24 016 034 – 15 June 2025

This complainant complained that the Council failed to properly consider their neighbour's planning application to develop their property, which is in a conservation area. The application included the installation of solar panels. The complainant highlighted that the Council failed to preserve the appearance of the traditional slate roof and they wanted the Council to revoke the planning permission and to have the solar panels removed.

The Ombudsman found there was a lack of explanation in some areas of the case officer's report when deciding on the planning application. There was also an error in describing the solar panels being proposed. However, the Ombudsman found this did not lead to a different outcome on the planning application which caused injustice to the complainant. This was because the fault we identified did not lead to development taking place that would have been refused had the fault not occurred. The Ombudsman say this because the solar panels had the benefit of permitted development, regardless of the planning decision.

There was also fault in the way the Council decided the Certificate of Lawfulness. However, this did not cause injustice, because it did not lead to a different outcome.

There were no suggested recommendations or remedial orders given to the Council.

Environmental Services & Public Protection & Regulation

Complaint: 25 004 824 – 15 June 2025

This complainant complained about the way the Council dealt with issues they had with their neighbour. The Council was allegedly at fault for delaying in responding to reports of antisocial behaviour, and failing to signpost the resident to the case review process.

The Ombudsman found that the Council had already accepted fault for delays in responding to the residents reports and in writing to other neighbours to ask if they had witnessed any anti-social behaviour. The Ombudsman noted that the Council had also already apologised and offered redress for personal injustice caused, which was deemed sufficient. The Ombudsman also found that when the resident expressed dissatisfaction with the outcome of the ASB reports, the Council should have told the resident about the ASB case review process (formerly known as 'Community Trigger').

As a result of this complaint, the Ombudsman recommended that the Council send an apology to the resident. This action was completed.

Appendix 4

Number of LGSCO cases, yearly comparisons

The below table shows the number of complaints referred to the LGSCO, against how many cases were investigated, and how many of those investigated were upheld.

Year	Total Enquiries Received	Cases Investigated	Cases Upheld
2025-26	24	2	1
2024-25	16	0	0
2023-24	17	1	1

Reasons to not investigate a complaint include the complaint not being made within 12 months of the issue occurring, complainants not providing sufficient information to allow the LGSCO to investigate, and in some cases, the complaint not being passed through the Council's complaints procedure first before escalation. In these instances, the LGSCO gives advice, and signpost complainants to sources of further information.

Housing Ombudsman Service (HOS)

The Council's Annual Performance Report has not yet been received. Once received, it will be presented to Housing Advisory Board later in the year, and published on the Council website.

Complaints under the Councillors' Code of Conduct

Councillors must adhere to the Council's Code of Conduct whenever they are conducting Council business, representing the Council or conducting the business of the office to which they were elected. The purpose of the Code of Conduct is to ensure high standards of ethics and conduct are maintained and that councillors treat everybody in an equal capacity and with respect, ensuring at all times that the integrity of the Council is not compromised in any way.

Complaints about councillors are considered initially by the Council's Monitoring Officer (who is also the Head of Legal Practice). When the Monitoring Officer receives a complaint about breach of the Code of Conduct, they consult one of two "Independent Persons" appointed by the Council. The role of the "Independent Persons" is to introduce external scrutiny of the complaints process. The Monitoring Officer can respond to a complaint, can commission a formal investigation or can refer it for consideration by the Council's Standards Sub-Committee. The Council's Standards Sub-Committee is made up of three Councillors.

Councillor Conduct Complaints, 2025-26

During 2025-26 there were four complaints about Councillors.

Of these cases one case proceeded to be investigated and was partially upheld. Two cases were dismissed. One case was not substantiated.

Appendix 4

During 2024 -25 seven complaints were received about Councillors.

None of these complaints were passed for formal investigation with apologies provided in 2 instances, insufficient information to proceed in 1 instance and 3 complaints dismissed.

There were six complaints in both 2023-24 and four in 2022-2023. To find out more about the Council's Code of Conduct visit our website or contact the Council's Monitoring Officer Tom Lewis: tom.lewis@3csharedservices.org