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SUBMITTED BY EMAIL

Greater Cambridge on behalf of Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy (CIL) Draft Charging Schedule Representations on behalf of Trinity College, Cambridge

1. Question 1: Respondent Details and Interests

Respondent: Trinity College, Cambridge

Category: Developer / Landowner

Date: March 2026

Trinity College, Cambridge ("TCC") is one of the oldest and most significant landowners in Greater Cambridge, having been established by Royal Charter in 1546. TCC has for nearly five centuries maintained a deep and enduring interest in the prosperity, liveability and global competitiveness of Cambridge. This is not merely a matter of institutional history: TCC's estate, its academic mission, and its role as the founder and long-standing steward of the Cambridge Science Park place it at the heart of Greater Cambridge's economic success.

Trinity College founded the Cambridge Science Park in 1970. Now spanning over 150 acres, the Science Park is Europe's longest-established commercial research and development park and is home to over 170 companies employing more than c. 7,000 – 7,500 people. TCC's landholdings and development interests across Greater Cambridge mean that it has a direct and substantial stake in the planning and infrastructure frameworks that will govern the area's growth over the coming decades.

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.

2. Question 2: Participation in the CIL Examination

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.



3. Question 3: Do You Agree that the Council Should Introduce CIL?

Position: Support in principle, with significant and specific reservations.

Trinity College supports the introduction of a Community Infrastructure Levy in principle.

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. TCC recognises the Councils' need to identify and secure infrastructure funding to support growth.

However, TCC's 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. As set out below, TCC 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.

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:
 - applying nil CIL rates or, at the very least, reduced rates to ensure they do not compromise the viability of strategic sites; and
 - 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.

In addition to the points set out above, Trinity College emphasises the importance of ensuring that the CIL regime supports the delivery of a balanced and sustainable pattern of growth across Greater Cambridge. This includes not only the provision of high-quality employment and research space, but also the delivery of affordable and workforce housing, alongside the transport infrastructure required to ensure that the area's workforce can access employment. Without this, there is a material risk that labour supply constraints will undermine the delivery and long-term success of planned growth. It is therefore important that the proposed charging schedule does not inadvertently constrain the delivery of such development.



4. Question 4: Has the Council Demonstrated a Funding Gap?

Position: Partially agreed, but the funding gap analysis does not adequately account for strategic site complexity.

Trinity College 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, TCC raises a fundamental concern about the point at which this CIL is being introduced. Trinity College has appointed KMC to undertake a review of the evidence base relating to the Funding Gap, and the findings of their review are set out below.

4.1 The basis for a CIL charge

The steps required to develop a CIL charging schedule are clearly set out in the regulations and the National Planning Policy Guidance on CIL. In summary, in terms of infrastructure planning, Government guidance on the Community Infrastructure Levy explains that the charging authority is required to:

- Identify the infrastructure necessary to deliver development of its area – which in this case the Councils have identified to be the development within their 2018 Local Plans.
- Identify funding sources for that infrastructure and calculate any funding gap to enable its delivery.
- Assess the viability of filling that funding gap through the application of CIL.
- Create a charging schedule based on that information.

These steps create a ‘golden thread’ from infrastructure need, through funding to delivery and are vital if the need for a CIL is to be justified.

In the case of the CIL charge proposed by GCPS, the intention is only to cover the funding gap for transport infrastructure; other infrastructure will be funded through s106 as at present.

4.2 The evidence base

The current Cambridge City and South Cambridgeshire Local Plans were adopted in 2018. A new joint Local Plan is expected to be adopted in 2028.

The CIL consultation document notes that the transport infrastructure evidence base for the 2018 Local Plans is the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) produced by the County Council in 2014. The TSCSC is an ambitious and wide-ranging document and provides a long list of transport schemes across the area that the County Council would like to see delivered. These are grouped into short/medium, medium, medium/long, and long term and it recognises that many are aspirational and may not be delivered.

The TSCSC notes that one of its objectives is to support the Cambridge City and South Cambridgeshire Local Plans by showing infrastructure that is needed to deliver growth and to inform the development of a potential CIL charge for the area. In presenting the list of schemes, the TSCSC does not distinguish between ‘nice to have’ schemes and those necessary to deliver the Local Plans.

The transport Infrastructure list and funding requirement in the CIL consultation is based on the current City Deal transport programme. The TSCSC was used as a base to develop this programme



which was approved by the constituent Councils (Cambridge City, South Cambridgeshire and Cambridgeshire County) in late 2014.

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. As an example of how this is now being undertaken, the Combined Authority (CPA) is currently preparing the Greater Cambridge Transport Strategy (GCTS) that will be used to support the emerging Joint Local Plan. This means that the 'necessary' test for those schemes to unlock development in the Local Plans has not been clearly demonstrated.

Since its initial adoption, the contents of the City Deal transport programme have changed and some of the most significant transport capacity schemes have dropped out (for example Western Orbital) and others have changed significantly (for example the now delivered Milton Road and Histon Road schemes have changed from strategic bus corridor schemes to largely active travel and environmental schemes). Schemes are now included in the City Deal programme that were not prioritised in the TSCSC.

The 'necessary' link as required in the regulations, between the evidence base (the TSCSC), the GCP transport programme schemes and the proposed CIL is not clearly made in the current consultation. There is not a direct and evidenced link between the schemes for which CIL is being sought and the developments in the current Local Plans meaning that the current consultation does not meet the statutory requirement.

4.3 The funding gap

The funding gap the CIL is seeking to fill is stated in the consultation as £272,371,000.³ This is the gap between the latest project costs for the City Deal programme (£891,167,000) and the funding already received or expected (£618,796,000). As noted above, 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 as confirmed at the Transport and Works Act Order (TWAo) inquiry, Cambridge South East Transport (CSET) is costed at £160m of which £7.2m has been provided by government so far. It has a TWAo inquiry commencing in September 2026 and in advance of that it will need to be demonstrated that funding is available. This requirement is before the likely implementation of CIL and so will need to rely on alternative funding sources. 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 bulk of the remaining schemes in the GCP programme do not offer significant strategic capacity enhancements and their necessity for developments in the Local Plans has not been evidenced.

According to the consultation document, the proposed CIL is expected to secure between £5m and £10m pa, a maximum of £50m to the end of the life of the GCP or a likely maximum of £20m before adoption of the Greater Cambridge Local Plan with a new IDP.

Any CIL raised will substitute existing s106 receipts for strategic transport infrastructure. It is not clear if the above figures are net of s106. If not, the likely yield from the CIL will only be 50% - 75%



of the stated totals, given recent development experience. This low expected yield from CIL does little to close the stated funding gap and the schemes that could be delivered with it.

Clear evidence of the link between the funding gap and developments in the Local Plans is not provided in the consultation. The schemes that are not already funded and make up this funding gap don't have clear evidenced links to the developments in the Local Plan meaning the current consultation does not meet the statutory requirement to introduce a CIL charge.

4.4 Timing

The current Cambridge City and South Cambridgeshire Local Plans are expected to be replaced in 2028. They will have a new Infrastructure Development Plan and transport strategy supporting them and the contents are expected to differ significantly from the current City Deal Transport Strategy. The proposed CIL is not expected to be implemented until early 2027 and the first receipts are likely to be superseded by the new Local Plans for which there will be a firm evidence base.

The life of the City Deal and GCP as delivery body expires in 2030. It is currently uncertain what will happen if schemes from the City Deal transport programme have not been delivered by that time and whether any of the residual schemes will be carried over to another body, for example, the CPCA.

There will also be significant changes in governance and funding in the area with the expected creation of a Development Corporation and the work of the Cambridge Growth Company. This should be factored into any new model for developer contributions in the area.

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. It is too early in that a more effective approach would be to assess infrastructure that is evidence based and required to deliver the joint Local Plan.

It would therefore be a better use of resources to pause the current consultation and develop an appropriate mechanism for developer contributions based upon a strong evidence base and the development strategy to 2045 in the new Local Plan.

4.5 Overall summary assessment

Whilst in principle, CIL is an appropriate mechanism for GCPS to consider as a means of funding strategic transport infrastructure, 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.

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.

5. Question 5: Has the Council Used Appropriate Evidence to Inform the Proposed Rates?

Position: No, the viability evidence base is materially incomplete in respect of R&D and laboratory development.

5.1 The Distinctive Nature of R&D and Laboratory Development

Greater Cambridge's economy is defined to an exceptional degree by its research and development sector. The Cambridge cluster is globally recognised as a pre-eminent location for life sciences, biomedical research, deep technology and advanced engineering. The continued delivery of high-quality, purpose-built R&D and laboratory facilities is not peripheral to Greater Cambridge's growth story; it is central to it. These buildings are among the most technically demanding and costly structures in the commercial construction sector, and they are qualitatively different from the standard office or light industrial typologies against which CIL viability assessments are typically benchmarked.

Trinity College, as the founder and operator of the Cambridge Science Park, has first-hand experience of the capital costs involved in delivering specialist R&D facilities to the standard required by the modern life sciences and deep-tech sectors. TCC is therefore well placed to identify the gaps in the viability evidence base as it relates to this development typology.

5.2 Construction Cost Premium: R&D and Laboratory Buildings

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. These often include:

- Specialist mechanical, electrical and plumbing (MEP) engineering: Laboratory buildings require significantly more complex and robust MEP systems than standard offices, including dedicated HVAC systems capable of maintaining precise temperature and humidity conditions, high-capacity extract and supply ventilation (often requiring air change rates



many times greater than those for offices), and dedicated exhaust systems for fume cupboards, biosafety cabinets and chemical storage.

- Multiple utility supply systems: R&D buildings typically require the provision of multiple separate water supply systems (including purified and ultra-pure water to bench level), the reticulation of specialist gases (including inert gases, compressed air and, in some facilities, hazardous gases), and enhanced electrical supply capacity for high-load scientific equipment.
- Structural specification: Laboratory floors must be designed to carry substantially greater imposed loads than office floors, and in many cases require vibration-dampening specifications for precision instruments and microscopy suites. Reinforced slab construction, additional structural depth and post-tensioning are commonly required.
- Enhanced spatial efficiency ratios: Plant room spaces in laboratory buildings routinely account for more than 15% of net floor area, with additional space consumed by risers, service corridors and interstitial floors. This significantly reduces the net-to-gross ratio of the building, meaning that the usable floor area available for occupation is proportionally lower than for office development of equivalent gross floor area.
- Regulatory compliance and containment: Depending on the nature of the research activity, laboratory buildings may be required to meet Containment Level 2 or Level 3 specifications under COSHH and biological agent regulations, involving enhanced construction standards, sealed penetrations, airlocks and specialist waste disposal infrastructure.

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. Data from quantity surveying practices and construction cost databases indicates that while a standard commercial office building in the Cambridge area might be expected to cost in the region of c.£300–£400 per square foot (GIA), a purpose-built laboratory or R&D facility typically costs between c.£450 and £550 per square foot, with highly serviced research facilities, cleanrooms and containment-grade laboratories at the upper end of or beyond this range. Specialist fit-out costs, above the base shell-and-core, can add a further £100–£200 per square metre or more depending on specification.

These are not marginal differences. They represent a fundamental distinction in development economics that has direct and material implications for the residual land value of R&D development, and therefore for the level of CIL that such development can viably sustain. This is not recognised within the viability report.

5.3 The Viability Report Does Not Adequately Model R&D Development Economics

Trinity College has appointed DS2 to undertake a review of the Greater Cambridge Viability Report. TCC is concerned that the viability modelling does not properly reflect the construction cost profile and development characteristics of specialist R&D and laboratory schemes. In particular:

- The Viability Report relies on benchmarks that fail to adequately distinguish between standard commercial office development and specialist laboratory or R&D buildings. R&D is effectively grouped with offices as a single use class, with no meaningful differentiation in terms of value, cost, or design efficiency.



- Build cost assumptions are derived from BCIS data, which is based on a historic and relatively limited dataset. As a result, these benchmarks are likely to materially underestimate the true cost of delivering modern R&D and laboratory facilities.
- The study applies a blanket net-to-gross ratio of 85% across both office and R&D uses. While this may be appropriate for office schemes, laboratory and R&D developments typically operate at significantly lower efficiency ratios, leading to an overstatement of net lettable area.
- The BNP analysis draws comparisons with Oxford City CIL rates, asserting that the Cambridge office and R&D markets share similar characteristics. It notes that Oxford has increased its Office and R&D CIL rate to £175 per sqm and uses this as a high-level justification for a similar rate in Cambridge. However, BNP's own Local Plan Viability Assessment Update for Oxford adopts R&D rental values up to one-third higher, and yields up to 125 basis points stronger, than those assumed for Cambridge. These assumptions imply materially higher development values in Oxford, undermining the rationale for applying equivalent CIL rates in both locations.
- For residential and student developments, excessive CIL rates can be mitigated through reductions in affordable housing obligations, supported by a financial viability assessment within an established policy framework. By contrast, R&D schemes have no equivalent mechanism. The only potential offset is an application for exceptional CIL relief, which is granted solely at the discretion of the planning authority and may not be available in practice. As a result, R&D developments have far fewer mechanisms to maintain viability, increasing the importance of setting appropriate CIL rates.
- Given the scale and strategic importance of future R&D development in Cambridge, the viability of R&D-specific CIL rates should be assessed on a standalone basis rather than being subsumed within broader commercial assumptions.
- The Viability Report does not include a discrete sensitivity analysis or development appraisal for purpose-built laboratory, wet lab, or containment-grade R&D facilities as a distinct typology. Given the economic significance of this sector to Greater Cambridge, this represents a significant omission.
- The report also fails to recognise the diversity within the R&D sector itself, which ranges from light R&D and incubator space to fully fitted wet labs and highly specialised containment facilities. These typologies have materially different cost and value profiles and should be modelled separately, with differentiated CIL rates or zones where appropriate.

The combined effect of these shortcomings is that the proposed CIL rates for commercial development, if applied uniformly to R&D and laboratory uses, are likely to be set at a level that risks undermining the viability and delivery of the very forms of development that Greater Cambridge's economic strategy and emerging Local Plan seek to promote

5.4 Net Zero Carbon and Water Efficiency Policy Costs

In addition to the R&D cost premium concerns set out above, TCC notes that 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: The Draft Local Plan contains policies requiring new development to achieve net zero carbon in operation, going well beyond current Building Regulations. For laboratory and R&D buildings, which are among the most energy-intensive building types in the commercial sector, due to continuous HVAC operation, high-load scientific equipment



and 24/7 occupancy profiles, the cost of achieving net zero carbon compliance will be substantially greater than for standard commercial uses. The Viability Report does not appear to model this cost uplift for R&D typologies.

- Water efficiency (80 l/p/d): The emerging Local Plan includes a policy requiring new development to meet a water efficiency standard of 80 litres per person per day. Whilst this policy is primarily directed at residential development, the broader policy context of water neutrality and water resource scarcity in the Cambridge Water supply zone applies to all uses, and the cost of compliance should be reflected in the viability evidence base. This is currently assumed at no cost implications, however adoption of measures such as condensate recovery in R&D buildings do have an upfront cost to achieve enhanced water efficiency within buildings.

The cumulative effect of unmodelled policy costs, net zero carbon compliance, water efficiency, and in the case of R&D buildings the specialist construction requirements as highlighted in 5.3, means that the Viability Report materially overstates residual land values and cannot be relied upon to support the proposed CIL rates.

6. Question 6: Has the Council Struck an Appropriate Balance Between Investment and Viability?

Position: No, 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.

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. TCC 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.

TCC urges the Councils to commission a supplementary development appraisal specifically addressing R&D and laboratory typologies, using construction cost data appropriate to that sector. This work should include a robust sensitivity analysis to test the impact of varying cost, value, and efficiency assumptions. The results should then be used to confirm whether the proposed rates are genuinely viable for these uses once all relevant policy requirements and development costs are properly accounted for.

If this supplementary appraisal demonstrates that lower rates are warranted for R&D uses, or that strategic sites cannot viably support the proposed charges, the Charging Schedule should be amended accordingly prior to submission for examination.



7. Question 7: Is It Clear How CIL Will Operate Alongside Section 106 Obligations?

Position: No, the relationship between CIL and S106 for strategic sites requires clarification and is not adequately addressed.

This is a matter of particular concern to Trinity College. TCC's 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.

TCC's position is that strategic sites (those of a scale and complexity that will require bespoke infrastructure delivery and phasing agreements) should be subject to bespoke Section 106 obligations only rather than a combination of both s106 and CIL contributions. A one-size-fits-all CIL rate cannot adequately reflect the infrastructure requirements generated by a major mixed-use, employment-led strategic development that will itself be delivering significant on-site and off-site infrastructure as part of its consent obligations.

TCC notes that the CIL Regulations permit the Councils to exclude certain developments from the levy, and to use S106 obligations to address site-specific infrastructure requirements. Strategic sites including Cambridge Science Park should therefore be nil rated and its mitigation addressed through s.106. 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.

TCC requests that the Councils introduce a nil rate applicable to strategic sites and provide additional guidance, prior to submission for examination, on how CIL will interact with S106 obligations.



8. Question 9: Has the Council Met All Regulatory Requirements?

Position: Not fully, 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 (Regulation 14(1)(b)) and that the Councils have regard to the actual costs of infrastructure and the economic viability of development. Trinity College 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).

TCC 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.

9. Summary

Trinity College has been a cornerstone of Cambridge's academic and scientific life for nearly five centuries, and for over fifty years has been a leading force in the development of Cambridge's globally significant research and innovation economy through the Cambridge Science Park. TCC submits these representations not to obstruct growth, but to support good growth: growth that is viable, deliverable and consistent with the ambitions that the Greater Cambridge Local Plan will set for the area.

Trinity College supports the introduction of a Community Infrastructure Levy (CIL) across Greater Cambridge in principle. However, it does not consider that the current proposals are sufficiently evidenced or timed to meet the requirements of Regulation 14, particularly in relation to R&D development and strategic sites.

Key Concerns

- The CIL is being advanced in advance of the adoption of the emerging Greater Cambridge Local Plan. At this stage, strategic site infrastructure requirements are not yet sufficiently defined to provide a robust basis for the funding gap analysis for the emerging Local Plan. As such, the proposals are both premature in the context of the emerging plan and misaligned with the now-dated evidence base for the 2018 Local Plans.
- The Viability Report is materially incomplete, as it does not model specialist R&D and laboratory development as a distinct typology. In particular, it fails to account for the significant cost premiums associated with mechanical, electrical and plumbing (MEP) systems, structural requirements, and reduced spatial efficiency typical of such buildings.
- The viability evidence does not adequately reflect the cost implications of emerging policy requirements, particularly in relation to net zero carbon and sustainability standards, which are likely to have a disproportionate impact on energy-intensive R&D uses.



- The proposed approach does not properly address the role of strategic sites. These locations require bespoke infrastructure delivery mechanisms, and the interaction between CIL and Section 106 obligations is not clearly or appropriately articulated. A blanket CIL rate risks undermining the viability and delivery of these complex, infrastructure-heavy schemes.

Trinity College therefore requests that the Councils:

- 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:
 - applying nil CIL rates or, at the very least, reduced rates to ensure they do not compromise the viability of strategic sites; and
 - 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.

Trinity College requests the opportunity to participate in the examination process and appear at hearing sessions in future.

In addition to the points set out above, Trinity College emphasises the importance of ensuring that the CIL regime supports the delivery of a balanced and sustainable pattern of growth across Greater Cambridge. This includes not only the provision of high-quality employment and research space, but also the delivery of affordable and workforce housing, alongside the transport infrastructure required to ensure that the area's workforce can access employment. Without this, there is a material risk that labour supply constraints will undermine the delivery and long-term success of planned growth. It is therefore important that the proposed charging schedule does not inadvertently constrain the delivery of such development.

Yours faithfully

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