

2 October 2026

CIL Programme Officer: Ian Kemp
Greater Cambridge Shared Planning Service

By Email.

Dear CIL Team

Subject: Representations on behalf of Cambridge Biomedical Campus Ltd: Greater Cambridge CIL Examination

1. Newmark write on behalf of Cambridge Biomedical Campus Ltd ('CBCL'), further to the Greater Cambridge Shared Planning Service (GCSP) consultation comments relating to the proposal Community Infrastructure Levy (dated 28th March 2026); in response to the Cambridge City Council and South Cambridgeshire District Council Community Infrastructure Levy ('CIL') Charging Schedules Examination – Issues and Questions. (October 2026).
2. The Cambridge Biomedical Campus (CBC) is the largest centre for commercial and academic life sciences and health research in Europe, and home to AstraZeneca, Abcam (Danaher), the MRC's Laboratory of Molecular Biology, Cancer Research UK, three NHS Hospital Trusts, the University of Cambridge's Clinical School and multiple research institutes on a single site. As a global destination for life sciences talent and investment, CBCL attract world-class researchers, clinicians and industry scientists, along with significant investments. CBCL:) was created in 2021 as a non-profit partnership which represents the health, research, education and life science organisations located on the Cambridge Biomedical Campus. CBC Ltd is neither a landowner nor a developer, although some of their members own land. CBCL recognise that several of their members have also submitted representation regarding the proposed CIL charging schedule and support their conclusions.
3. These responses specifically focus on a review of the viability evidence ('the Viability Assessment') submitted by BNP Paribas RE¹ (January 2026) underpinning the proposed CIL rate for Offices and R&D uses – Issue 7.
4. Further to CBCL original representation CBCL consider that; to ensure viable delivery for future Campus development; any potential campus uses (such as health, research, education and life science) which may be consider to be included within R&D uses are exempt from the Office and R&D CIL category (and included in 'Other Uses' category); and any associated, fair and appropriate infrastructure contributions are delivered through a Section 106 agreement.
5. CBCL consider that this approach will support and maximises the viable opportunity for Biomedical development opportunities within the Cambridge area which is designated as a UK priority for Life sciences and growth.

¹ Also includes Quintic response dated 5th June 2026.

Issue 7 – Charging rate for offices and R&D

"1. Do the two office typologies provide appropriate evidence for the types of schemes being brought forward in Greater Cambridgeshire? Do they provide appropriate evidence in relation to R&D uses?"

6. **CBCL do not consider that two office typologies provide appropriate evidence** to reflect the wider range of uses captured in the proposed CIL rate of £175 psm for Offices and R&D.
7. **CBCL do not consider it to be clear what uses/occupants will be deemed 'R&D' compared to 'All Other Uses';** and there is no evidence or examples of the anticipate 'R&D' being tested within the typologies, creating significant ambiguity.
8. **There is no evidence presented by the GCSP to support the proposal that £175psm is a viable option for all potential R&D uses** and we consider it is appropriate to removal reference to R&D within this CIL rate category and resolve CIL receipts for this range of uses in the 'All Other Uses' category.
9. CBCLCBCL consider that laboratory/pharmaceutical and health led development is materially different to any of the tested typologies set out in the viability assessment underpinning the CIL charge scheduled.
10. CBCLCBCL note that the draft CIL Charging Schedule proposes £175psm for Office and R&D uses. However, the evidence only includes 2 office typologies which appear to differ only in size (albeit there not significant difference in typologies 29 & 30 -i.e. 10,000 and 15,000 sq m (GIA)).
11. The two office typologies tested therefore do not represent the variation in the potential scale of office developments nor do they consider any impact of R&D facilities which could fall into this category; and therefore, are wholly unrepresentative of the sector.
12. On review we note that of the 48 typologies tested, only 2 office typologies have been considered which represent c.4% of the total tests. Furthermore, none of the Office typologies tested reflect a non-standard office assessment, and the highest proposed rate is not justified with the evidence for R&D uses.
13. Typologies 1 – 26 (inclusive) are all residential, and typologies 34 – 39 are student/ co-living). Therefore, only 16 of the typologies are related to commercial uses, to the residential.
14. CBCLCBCL consider standard office uses generally include typical Grade A office shell and core, Standard M&E systems, typical floor loading and conventional ventilations. Whereas Laboratories include significantly higher M&E content, specialist ventilation, extraction and cooling; enhanced floor loading, specialist gas, water treatment, containment and resilience systems and a significantly higher power demand. Furthermore, laboratory uses generally require larger floor to floor heights, more riser space and great plant areas. As such CBCLCBCL do not consider the proposed typologies to be reflective of Lab R&D which can be further materially different to other R&D uses.
15. CBCLCBCL consider that the generic use of 'R&D' for CIL charging purposes is poorly considered because the definition of R&D uses that the rate would apply to is not clearly defined in the CIL charging Schedule. This ambiguity will create debate between Applicants and the GCSP as to whether the development should be considered as 'Offices and R&D' or should be captured in the 'All other uses' category, which is nil rated in the draft charging schedule.
16. For instance, the rep submitted on behalf of Cambridge University Hospitals states that they are building the investment case for a new Acute Hospital which would become the central anchor of an improved Cambridge Biomedical Campus and create a significant opportunity for redevelopment of the existing hospital estate. CUH's rep seeks clarity on how the CIL would be applied to a range of hospital-related uses; this type of use is not tested in the Viability Assessment.

17. In a planning context, Research and Development (R&D) use generally refers to premises used for research, testing, design, experimentation and product development activities and therefore occupants and profile of costs vary significantly within this definition which are not accounted for in the typologies.
18. Typical examples include Laboratory buildings, pharmaceutical research facilities, Technology innovation centres, Engineering design and testing facilities, Life sciences campuses, University-linked research facilities; all of which have very different development profiles which are not considered/evidenced in the Viability Assessment.
19. Furthermore, CBCLCBCL note that the Viability Assessment does not appear to state the assumptions relating to geography in assessing the typologies, i.e. City Centre assumed typologies compared to business parks, and as such CBCLL do not consider that the viability evidence demonstrates that the typologies reflect evidence for the types of schemes being brought forward in Greater Cambridgeshire.
20. CBCL note in the rep prepared by Gonville & Caius College – University of Cambridge, that they consider that the justification in the viability evidence of comparing to that considered for the Oxford City Council CIL charging schedule does not reflect a reasonable consideration of geography, with rates varying for R&D uses depending on location. It is not clear in the evidence if the anticipated location of R&D uses in Greater Cambridge is consistent with Oxford in terms of geographical and strategic variation. As such CBCLCBCL do not consider that the tested typologies adequately consider other variations, such as geography and strategic importance, when being justified by having regard to other CIL charging schedules, and as such do not evidence schemes being brought forward across in Greater Cambridgeshire having regard to geographical variance.

"2. Is the assumption on build costs appropriate and sufficiently up to date?"

21. **CBCL do not consider that the build cost assumptions applied in the Viability Assessment are sufficient to cover R&D uses** and that this does not provide an appropriate CIL buffer for proposed R&D uses in Greater Cambridgeshire.
22. The Viability Assessment sources build costs from BCIS, presented at table 4.11.1. However, Table 4.11.1 does not include R&D as a category; it instead only considers BCIS cost category '320 Offices air conditioned generally'. CBCL have already highlighted that laboratory uses carry significant additional requirements related to M&E, ventilation/extraction, floor loading and resilience systems and power which can significantly increase costs to standard officed between 50% and 100%. Other R&D uses such as Engineering design and testing facilities, and technology innovation centres also carry specific costs which will materially differ from the typologies and assumptions of cost tested.
23. CBCL note that BCIS does identify categories potentially more appropriate but not tested for R&D facilities in '700 Educational, Scientific, Information Facilities, including:
- 731.1 Research facilities.
 - 732 Laboratories.
24. Additionally, the Viability Assessment does not state which BCIS quartile has been selected, nor the date that has been selected, and our review of the BICS evidence shows a different rate²; the 'Median' has been included below rebased to Cambridgeshire. However, we recognise that individual schemes (such as wet labs) may have costs which exceed the median.

BCIS Category	Base Cost per sq m (Median) ³
320 Offices air conditioned generally	£2,580
731.1 Research facilities	£3,203 (25% ^)
732 Laboratories	£5,414 (100% ^)

25. The table above demonstrates that using an office typology 'standard cost' does not adequately reflect R&D uses and therefore the evidence presented to justify the proposed CIL rate of £175psm is not appropriate.
26. Additionally, the range in rates highlighted above demonstrates the potential variation between different R&D uses (e.g. research facilities and laboratories for instance). This position is supported in the rep by Trinity College, which has firsthand experience of the capital costs of delivering specialist R&D facilities and that the Viability Assessment should reflect up-to-date costs reflecting a full range of typologies in the sector. As such, the applied rate does not provide sufficient buffer to demonstrate a wider range of R&D uses to be viable at the proposed CIL rate.

² The BCIS extract is at **Appendix 1**

³ Last updated 19th September 2026

27. The Quintic response dated 5th June 2026 states that the capital value reported in the viability report is c. £950 per sq ft, which is c. £478 per sq ft lower than the rents reported by Bidwell's and Carter Jonas in their market reports; and as such this difference accounts for the additional construction costs. However, although highlighted to the GCSP no further tests of R&D typologies were tested to sufficiently justify with evidence the Draft Charging Schedule rate for R&D. The references to the Oxford City Council viability evidence have not been sufficiently demonstrated to be relevant in a Greater Cambridgeshire context.
28. Furthermore, it is unclear if any allowance for contingency has been made in addition to the build costs in the appraisals and if this has not been included it would underestimate the potential cost of delivering the schemes. CBCL consider it is paramount a contingency is included given the scope of variation in costs associated with R&D uses.

"3. Is the increase for external works appropriate?"

29. **CBCL consider that the externals work allowances of 10% is not sufficiently evidenced to support all anticipated external works related to anticipated for R&D works.** The Viability evidence assumes there is a linear link between the based build cost and external works.
30. However, the evidence does not demonstrate with the base build is accurate for R&D and therefore the allowance cannot then be evidence as appropriate.
31. CBCL anticipated such works would include:

Site Access & Logistics

- Internal roads and service routes
- Delivery and loading areas
- Turning circles for HGVs
- Security gatehouses and access control
- Visitor and staff parking
- EV charging infrastructure

Landscaping & Campus Environment

- Soft landscaping (trees, planting, biodiversity areas)
- Hard landscaping (plazas, paving, seating)
- Amenity spaces for staff
- Outdoor collaboration areas
- Sustainable drainage features (ponds, swales, rain gardens)

Utilities & Infrastructure

- High-capacity electrical supplies
- Backup generators and fuel tanks
- Data and fibre connections
- Water and wastewater infrastructure
- Gas supplies (if laboratories require them)
- Substations and utility compounds

Laboratory & Technical Infrastructure

- Depending on the type of R&D:
- External plant compounds
- Cooling towers or chillers
- Air handling equipment
- Ventilation stacks
- Specialist gas storage areas
- Hazardous waste storage compounds
- Testing or prototype areas

Security

- R&D facilities often require a much higher level of security than offices:
- Perimeter fencing
- CCTV systems and security lighting
- Vehicle barriers and bollards
- Secure pedestrian access points

Sustainable Transport

- Cycle parking
- Shower and changing facilities
- Pedestrian routes
- Public transport connections

32. CBCL consider that that 10% of standard office costs is not sufficient to cover all anticipated external works set out above which are beyond the expectation of a standard office development.

33. The table below sets out Newmark's expectations for external works for difference works within this category of use:

Facility	External allowance
Standard Office	10%
Office Campus	8-12%
Light R&D	10-15%
Laboratory R&D facility	12-18%
Defence, Pharmaceutical or advanced engineering	15-25%

34. It is recognised that costs associated with R&D development could also be accounted for in 'additional costs. Therefore, it is not to double count such allowances within modelling. CBCL would like to highlight that a significant focus of their business is laboratory, and pharmaceutical uses and as such associated development will incur higher external costs.

35. However, what is clear is that an evidence base that relies upon two typologies of standard offices will not appropriately reflect the wider use costs associated with R&D and therefore it is inappropriate to aggregate R&D with offices and should instead be consider for a CIL charge in accordance with 'other Uses'.

CBCL note that the Viability Assessment also includes an additional infrastructure cost for larger residential developments related to utilities upgrades, estate roads, and other related infrastructure of £29,070 per unit to address these requirements. It is likely that these infrastructure items would also be required on an R&D campus and therefore it is not appropriate to only consider that this additional cost should be on residential developments.

"4.What is the basis for the assumptions on S106 costs and are they realistic and appropriate?"

36. Further to CBCL representation general exemption from CIL for the existing campus; CBCL propose that the fairest appropriate approach to deliver necessary infrastructure associated with Campus uses (currently potentially captured in the 'Offices and R&D' CIL category) would be through reasonable contributions within a Section 106 agreement; recognising some infrastructure may require to be supported by other uses/investment.
37. It is possible including a CIL rate on Campus uses may not guarantee contributions being directed towards necessary infrastructure related to the application; which could lead to overburdening and unviable potential development opportunities.
38. CBCL consider the general exemption approach or inclusion in the 'Other Uses' category would support the viable delivery of UK ambitions for growth in R&D facilities with an appropriate level of local and supporting infrastructure.
39. The basis for the S106 costs is an allowance of up to £25 per square meter for non-residential development and £25,000 per unit for residential schemes, and £46,000 per unit for major identified strategic site allocations. The study acknowledges that the actual amount will be subject to site-specific negotiations when schemes are brought forward.
40. It is not stated in the Viability Assessment, but the uplift for strategic site allocations may represent a higher level of infrastructure requirements, as a large R&D campus would incur significant infrastructure requirements and allocating the same rate to all non-residential developments would not account for this.
41. As stated previously, it is considered that the higher CIL rate in conjunction with S106 requirements and there could be a significant risk of double charging as it is not clear what the CIL would contribute towards compared to the expected S106 obligations that large developments are expected to deliver.

"5.What is the basis for the approach to benchmark land values and is this appropriate?"

42. **CBCL consider that the viability assessment does not demonstrate an appropriate BLV of an R&D campus**, which is likely greater in scale than an office of 10-15k sq m. Therefore, the BLV for this type of facility has not been appropriately tested in the Viability Assessment.
43. The CBCL consider the viability assessment tests four BLVs for all typologies:
- Secondary offices: £10.25m per gross hectare.
 - Secondary industrial: £3.54m per gross hectare.
 - Higher value greenfield (smaller sites): £370,000 per gross hectare.
 - Lower value greenfield (larger sites): £250,000 per gross hectare.
44. The greenfield values are the output of applying a multiplier above agricultural land value. Appraisal assumptions have been applied to arrive at the office and industrial values.
45. When reviewing the BLVs applied to the two office typologies, we note that these are significantly lower on all bases than most other typologies, largely due to the scale of the site/ floor space.
46. Section 6.22 of the Viability Assessment states that office developments across Greater Cambridge generate significant surplus values above BLV and can therefore viably contribute towards CIL. Section 6.22 also states that a significant proportion of this floorspace will be developed in research parks outside of the City on greenfield sites with low benchmark land values; this is not reflected in the typologies adopted in the study.
47. CBCL considers the proposed benchmark land value should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land and that the BLV must provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements.
48. CBCL recognise that price paid for land be a cannot be used for justification for failing to accord with relevant policies in the plan; however, it is anticipated no land for R&D facilities will sell for less than the proposed BLVs and therefore, the viability evidence is reflecting the maximum range of viability and an appropriate buffer should be included to ensure CIL combined with other policies burden the potential deliver opportunity of R&D uses in the Local Authority.

"6.Are the assumptions on rental income appropriate?"

49. **CBCL is unclear on reviewing the BNPPRE evidence base where the applied rents have been sourced and how they are related to R&D uses.** The comparable evidence of the lettings is not provided (with comparable evidence only provided for hotel uses) and therefore we are unable to confirm if it is limited solely to lettings of office space, or if any R&D facilities have been considered. We would therefore query the robustness and transparency of this evidence.
50. However, it is acknowledged that the Quintic response dated 5th June 2026 states that the capital value reported in the viability report is c. £950 per sq ft, which is suggested to be lower than the rents reported by Bidwells and Carter Jonas in their market reports
51. Quintic go on to suggest that this undervaluation addresses/off sets the application of construction costs, however, this has statement is not supported with evidence testing.
52. CBCL consider that R&D floorspace is usually valued differently from offices because; rents may be higher for specialist laboratory space; fit-out costs are substantially higher; yields and investor demand can differ significantly; tenant incentives and vacancy assumptions may vary.
53. The rep submitted by CEG Land Promotions Limited, prepared by Bidwells, also provides commentary which would cast some doubt over the rental assumption applied in the Viability Assessment, placing the average office rent in Greater Cambridge at less than half of what the Viability Assessment has assumed.
54. The rep submitted by Savills on behalf of a Promoter Consortium also casts doubt on the rent assumption assumed in the Viability Assessment, with the comparable evidence provided suggesting that it is overstated.

"7.Are the other assumptions including on profit, other costs and policy requirements appropriate? To what extent have emerging Local Plan policy requirements been taken into account?"

- 55. CBCL do not consider that the Offices and R&D proposed CIL has had appropriate regard to the characteristics/assumptions of R&D uses in the viability testing to enable to positive response to question 7.
- 56. As such the proposed rate has not reasonably considered the collective impact of the Local Plan policy burden which may be placed upon potential R&D uses.
- 57. The Viability Assessment does not provide a R&D specific typology assessment, nor does the evidence consider the variation on R&D use types noted above which have their own specific elements, cost and risk.
- 58. CBCL agree with the rep submitted by **Cambridge University Hospitals** which states that it is important that the rate set for Offices and R&D does not disincentivise these types of developments coming forward in a timely manner. The rate is non-negotiable and leaves no opportunity for negotiation, unlike other types of developments coming forward where a site-specific viability assessment can ensure the development is viable.

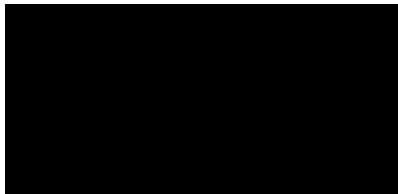
8. Is the charging rate of £175 per sqm for offices and R&D justified by the evidence? Does it provide for a sufficient buffer below the potential maximum charging rate?"

59. CBCL do not consider that a sufficient evidence base to support the adoption of the CIL Charging Rate of £175 per square metre to R&D uses has been provided in the Viability Assessment and that the application of this rate to a wider range of potential uses will lead to issues with viable delivery.
60. The proposed rate for R&D lacks the evidential justification required and would create a barrier to future development and investment, placing the delivery of strategic sites at risk.
61. CBCL consider, the Draft Charging Schedule fails to consider the different commercial reality within R&D developments and office developments, with Cambridge being at the forefront of research and development and hosting a wide range of sub-categories of R&D development. CBCL consider that due to this range the proposed rate does not provide sufficient buffer to ensure the proposed CIL rate will not over burden the viable delivery of R&D uses in the plan period.
62. CBCL note that the Quintic response dated 5th June 2026 places weight on the CIL rate adopted in Oxford City Centre. Newmark consider the rate for Cambridge should be considered on its own merits accounting for local market, scale and geographic differences to Oxford. CBCL note that the Oxford City CIL Charging schedule was supported by its own evidence base and this is a more robust approach to that adopted for the evidence underpinning the Greater Cambridge CIL Charging Schedule Examination.
63. CDCL is committed to working collaboratively with the GCSP to achieve a sound and workable Charging Schedule and engaging in this Examination process.
64. However, for the reasons set out above, we consider that the evidence base for implementing the draft charging schedule is not robust particularly regarding the rate applied to R&D.
65. CBCL do not consider the proposed CIL rate for Offices and R&D contains sufficient buffer to ensure GCSP can viably support the wider Government objective for life sciences growth in the UK.

66. As set out in CBCL's original representation, CBCL kindly request a general exemption⁴ from CIL for the existing campus and associated uses should be considered for the following reasons:

- i. Proposals brought forward by CUH on a range of sites on the existing campus will contribute to the funding package supporting the re-provision of the new acute hospital.
- ii. The development of the Cambridge Biomedical Campus is a multi-year and complex endeavour. To secure the delivery of the necessary infrastructure from transport to health and public realm on the campus, there may need to specific and additional funding mechanism introduced such as TIF (Tax Increment Funding). In these circumstances the CIL would likely need to be disapplied in order make these developments viable.
- iii. The development of the existing campus will include the delivery of several blocks of key worker affordable housing. If there is no general carve out from paying the CIL charge for development on the existing campus, then these housing schemes should be exempted from paying the CIL charge.

Yours sincerely



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Cc: Cambridge Biomedical Campus Ltd

Appendix 1 - BCIS extract

⁴ This could be achieved through the moving of associates uses to the 'Other Uses' category.

Appendix 1- BCIS extract

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 19-Sep-2026 08:00

Rebased to Cambridgeshire (101; sample 208)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
320. Offices								
Generally (15)	2,599	1,231	2,209	2,580	2,931	4,588	26	
Air-conditioned								
Generally (15)	2,478	1,680	2,215	2,463	2,859	2,967	11	
1-2 storey (15)	2,350	1,983	2,209	2,260	2,421	2,933	6	
3-5 storey (15)	2,591	1,680	-	2,859	-	2,967	4	
6 storey or above (20)	2,805	2,129	2,567	2,680	2,777	4,004	6	
Not air-conditioned								
Generally (15)	2,521	1,231	2,031	2,545	2,934	3,915	11	
1-2 storey (15)	2,635	1,692	2,256	2,545	3,072	3,915	9	
3-5 storey (20)	2,391	1,231	1,738	2,213	2,822	4,135	19	
6 storey or above (25)	2,933	2,279	-	3,030	-	3,391	4	
731.1 Research facilities (15)	3,351	1,777	2,096	3,203	4,287	5,279	9	
732. Laboratories (15)	5,014	2,653	4,365	5,414	5,827	6,642	7	