



# **Greater Cambridge CIL Draft Charging Schedule Examination Hearing Statement**

**02 October 2026**

**Produced by DP9 Ltd on behalf of  
Trinity College, Cambridge**

**DP9 DP7208/TAH/EM**

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## 1. Introduction

- 1.1 This Hearing Statement is submitted by DP9 and DS2, with input from KMC, on behalf of Trinity College, Cambridge ('TCC'). It should be read with TCC's representations dated 29 March 2026 ('Doc. 4.2.44'). In accordance with the Examiner's guidance, it does not repeat Doc. 4.2.44 and cross-refers to them where relevant.
- 1.2 TCC's interest as founder and steward of the Cambridge Science Park (CSP') is set out at section 1 of Doc. 4.2.44. CSP is the largest commercial employment site in Greater Cambridge by commercial floorspace. It comprises c. 250,000 sqm of predominantly R&D floorspace and supports c. 7,500 jobs across more than 170 companies. An outline planning application for up to 771,000 sqm of floorspace at CSP is currently before the Councils. TCC has also made representations on the Proposed Submission Greater Cambridge Local Plan (September 2026, 'TCC's Local Plan representations'). Appended to them are representations by Bidwell's on Policy J/AW, made on behalf of a consortium of commercial developers ('the Bidwells J/AW Note').
- 1.3 TCC's interests extend beyond the Science Park but for the purposes of this Hearing Statement we only comment on Issues 2 & 7. TCC has had a visibility of the Development Consortium's Hearing Statement material in relation to Issues 2 & 7 which we cross refer to.
- 1.4 TCC supports the introduction of CIL in principle and recognises the need to fund strategic transport infrastructure (Doc. 4.2.44, section 3). Its concern is that the Charging Schedules are being introduced at the wrong time, on evidence that does not relate to the development plan, and at a rate for R&D that has not been tested.
- 1.5 The timing concern runs through both Issues on which TCC makes full submissions. The Charging Schedules sit between two plans and are properly aligned with neither (Doc. 4.2.44, sections 3, 4.4 and 4.5):
  - (a) the infrastructure they would fund is drawn from the adopted 2018 Local Plans, which run to 2031, and from the 2014 Transport Strategy and City Deal programme that supported them (Doc 3.1<sup>1</sup>, sections 1 and 3; Doc 3.3<sup>2</sup>, Chapter 8);
  - (b) the viability evidence that sets the rates was tested against the Regulation 18 draft of the emerging Local Plan (Doc 3.2<sup>3</sup>, Table 2.35.1) (the "Viability Report"). That draft has since been superseded by the Proposed Submission Plan (August 2026), whose policy costs are materially different (paragraphs 5.34–5.36); and
  - (c) the emerging Plan has its own infrastructure and viability evidence, which the Charging Schedules do not take into account. That evidence comprises a draft Infrastructure

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<sup>1</sup> <https://www.greatercambridgeplanning.org/media/lcepwklr/31-cil-supporting-statement.pdf>

<sup>2</sup> <https://www.greatercambridgeplanning.org/media/iyhbu05y/33-greater-cambridge-infrastructure-statement.pdf>

<sup>3</sup> <https://www.greatercambridgeplanning.org/media/0myfytm5/32-greater-cambridge-viability-report.pdf>



Delivery Plan and the Greater Cambridge Local Plan Viability Assessment (Aspinall Verdi, July 2026, 'the LPVA'), which derives an allowance of £146 per sqm for commercial development from the IDP's funding requirement (paragraph 5.37).

- 1.6 The Charging Schedules were submitted for examination on 13 July 2026. The Proposed Submission Local Plan was consulted on from 3 August to 25 September 2026, with submission due by the end of December 2026 and examination expected in spring 2027. If approved, the Charging Schedules would take effect while that Plan is under examination. They would charge development coming forward under the new Plan on the basis of neither that Plan's infrastructure needs nor its policy costs.
- 1.7 This Statement addresses the Issues in the Examiner's Note and concludes with a summary of TCC's suggested amendments (Section 5).



## **2. Issue 1: Legislative requirements and consultation**

- 2.1 TCC is a major landowner and developer in Greater Cambridge. TCC's March Representations asked the Councils to commission and publish R&D-specific viability evidence (sections 3, 6 and 8), which has not been done. TCC is concerned that the Councils did not engage meaningfully with the viability evidence submitted by the development sector.



### 3. Issue 2: Infrastructure requirements and funding

- 3.1 This section draws on KMC's review of the infrastructure evidence at section 4 of Doc. 4.2.44. It responds to Questions 1, 2 and 4–8. TCC has no comment on Questions 3 and 9. TCC supports Consortium Hearing Statement 2, which sets out KMC's assessment of the infrastructure evidence in full, and does not repeat it. This section adds points specific to TCC.

*Question 1: Is the evidence on strategic transport infrastructure requirements adequate and sufficiently up to date?*

- 3.2 The infrastructure evidence relies on the Transport Strategy for Cambridge and South Cambridgeshire adopted in March 2014, and on the City Deal programme developed from it (Doc 3.1<sup>4</sup>, section 3). The 2014 Strategy was not tested and modelled in the way now expected of an Infrastructure Delivery Plan and did not distinguish schemes necessary to deliver the Local Plans from those that were aspirational. The programme has also changed materially since: significant capacity schemes have dropped out, others have been reshaped, and schemes not prioritised in 2014 have been added (Doc. 4.2.44, section 4.2). The link between the schemes CIL would fund and the development in the adopted Plans has therefore not been demonstrated.
- 3.3 The evidence is also time limited. The 2018 Plans cover 2011 to 2031 (Doc 3.3<sup>5</sup>, Chapter 8). The Proposed Submission Local Plan has its own draft Infrastructure Delivery Plan, which the LPVA summarises as identifying an infrastructure funding requirement of c. £1.18bn (Table 5.20<sup>6</sup>). The Charging Schedules take no account of this.
- 3.4 In answer to the Examiner's question, the evidence is not adequate or sufficiently up to date. It rests on a 2014 strategy that was never tested as an Infrastructure Delivery Plan, for a programme that has since changed, supporting Plans that will shortly be replaced. It does not relate to the infrastructure needed to deliver the emerging Plan, under which most of the development liable to CIL will come forward (paragraphs 1.5–1.6).

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<sup>4</sup> <https://www.greatercambridgeplanning.org/media/lcepwklr/31-cil-supporting-statement.pdf>

<sup>5</sup> <https://www.greatercambridgeplanning.org/media/iyhbu05y/33-greater-cambridge-infrastructure-statement.pdf>

<sup>6</sup> [GCLPVA 2026.pdf](#)



*Question 2: What is the timescale for implementation of projects and how is this intended to be achieved?*

- 3.5 The GCP budget forecasts run to 2030/31, and the GCP's life as a delivery body are currently due to end in 2030/31. It is not clear what will happen to schemes not delivered by then, or which body would take them forward (Doc. 4.2.44, section 4.4). The Councils also acknowledge that borrowing is likely to be needed ahead of Section 106 receipts, at a cost not yet understood (Doc 3.3<sup>7</sup>, Chapter 1).
- 3.6 In answer to the Examiner's question, the programme will largely be delivered or committed before CIL receipts arrive in any volume. Receipts cannot be expected before 2027 and will be spread over time by phased payment and instalments. CIL cannot materially influence the timing of the programme it is intended to fund. We would suggest the development of a charging schedule for developer contributions tied to the IDP associated with the emerging Local Plan would be the most sound way forwards.

*Question 4: What is the package of funding for this infrastructure and to what extent is it secured?*

- 3.7 The Councils identify total costs of £891.2m against received and secured funding of £618.8m (Doc 3.3, Tables 8–10). Of the major schemes:
- Cambourne to Cambridge was confirmed as fully funded at its Transport and Works Act Order inquiry;
  - Cambridge South East Transport Phase 2 is costed at c. £160m, of which £7.2m has been provided by government, and its TWAO inquiry will require funding to be demonstrated before CIL could contribute; and
  - Waterbeach to Cambridge and Cambridge Eastern Access had an outline business case approved in February 2025 indicating the GCP is content to fund the project. (Doc. 4.2.44, section 4.3).
- 3.8 The GCP budget includes £230m of anticipated future Section 106 income. The Councils have deducted it because the developments that would pay it "would instead be required to contribute via CIL" (Doc 3.3, Chapter 6). CIL is assumed to raise £50m (Chapter 8). On the Councils' own figures, the development that would otherwise have contributed through Section 106 is expected to contribute through CIL, but CIL is expected to raise less than a quarter of the Section 106 removed from the package.
- 3.9 In answer to the Examiner's question, much of the programme's funding is secured or expected from other sources. The unsecured element is, in part, a consequence of assuming that CIL will displace Section 106 income that CIL is not expected to match.

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<sup>7</sup> <https://www.greatercambridgeplanning.org/media/iyhbu05y/33-greater-cambridge-infrastructure-statement.pdf>



Question 5: How will the use of S106 contributions change following the introduction of the CILs? Will there be overlap?

- 3.10 The Councils state that Section 106 will continue to secure localised infrastructure, while strategic transport will be funded by CIL (Doc 3.3; Doc 5.1<sup>8</sup>, pp.32–33). The Infrastructure Statement does not identify which elements of the programme are to be delivered through Section 106 at strategic sites and which through CIL. Nor does it explain how double counting will be avoided where a strategic site is already making substantial Section 106 commitments (Doc. 4.2.44, section 7).
- 3.11 The risk of overlap is real. The Councils' Planning Obligations SPD (Version for Adoption, February 2026, Doc [6.4]) was adopted alongside the Charging Schedules, but it does not distinguish between the strategic transport contributions it seeks and the infrastructure that CIL would fund. It states that: *obligations will be sought wherever development generates a need for strategic transport improvements, including public transport and highway capacity* (para 10.14);
- contributions may be sought towards "known transport improvement schemes" (para 10.21), including the GCP initiatives to which developments are required to contribute (para 10.8);
  - those contributions will be calculated from the cost of the scheme and the development's trips (para 10.26); and
  - no type of development is exempt (para 10.27).
- 3.12 These obligations rest on the same 2014 Transport Strategy as the Charging Schedules (SPD, paras 10.4–10.6; Doc 3.1, section 3). The SPD's only reference to CIL is that any future levy "would complement rather than duplicate" Section 106 (para 1.21), and it does not explain how. On the face of the SPD, R&D development would pay CIL towards the GCP programme while remaining liable for Section 106 contributions to the same programme. A contribution towards infrastructure already funded through CIL would be difficult to reconcile with the necessity test in Regulation 122. The LPVA also assumes £146 per sqm of planning contributions and infrastructure costs on all commercial development. This figure is derived from the emerging Plan's infrastructure requirement and is separate from CIL. The Councils have not explained whether that requirement includes schemes that CIL would fund (paragraph 5.23). The Proposed Submission Plan also adds new Section 106 obligations for R&D development, including affordable workspace and energy offsetting (paragraphs 5.34–5.36.).
- 3.13 For R&D development, the change is shown by transport contributions negotiated in North East Cambridge over the last five years. These averaged c. £60 per sqm, covering both strategic and local measures (paragraphs 5.15–5.18). Under the Charging Schedules, strategic transport would be charged at £175 per sqm, with local measures still secured through Section

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<sup>8</sup> <https://www.greatercambridgeplanning.org/media/2amffspp/51-community-infrastructure-levy-consultation-statement.pdf>



106. For R&D, the change is a threefold increase in the transport contribution, not a substitution of one mechanism for another.

- 3.14 The position is most acute at strategic sites. At the Cambridge Science Park, transport mitigation for the undetermined outline application is being developed through a site-specific trip budget and pooled contributions towards the North East Cambridge measures in the Infrastructure Delivery Plan and NEC Transport Position Statement, secured through Section 106 (TCC's Local Plan representations, Policy S/AMC/NEC). A Section 106 package of that kind, combined with CIL on the same floorspace, would inevitably overlap. South Cambridgeshire's 2015 draft charging schedule nil rated strategic sites for this reason.
- 3.15 In answer to the Examiner's questions, there will be overlap. The Councils have not defined the boundary between CIL and Section 106 for strategic transport, and their own Planning Obligations SPD and Local Plan evidence continue to assume transport contributions alongside CIL. For strategic sites delivering their own transport mitigation, overlap is unavoidable unless those sites are nil rated (paragraph 7.2(b)).

*Question 6: Will there be a funding gap which justifies the introduction of the CILs in principle?*

- 3.16 TCC accepts that there is a funding gap against the GCP programme. However, the gap is measured against a programme whose necessity for the adopted Plans has not been demonstrated (paragraph 3.2), and it is enlarged by removing the anticipated Section 106 income that CIL is assumed to replace (paragraph 3.8). The Infrastructure Statement also gives the gross gap as £272,371,000 in Table 10 and £272,546,000 in Table 11 (Doc 3.3<sup>9</sup>).
- 3.17 After CIL, a net gap of c. £222m is expected to remain (Doc 3.3, Chapter 9). CIL would close less than a fifth of the gap and would not materially change delivery (Doc. 4.2.44, section 4.5).
- 3.18 In answer to the Examiner's question, a funding gap exists, but it does not justify introducing CIL now. The evidence is tied to Plans about to be replaced, CIL would arrive a year before the emerging Plan and its infrastructure evidence are examined, and the sum raised will not change what is delivered. A more effective course is to set developer contributions alongside the new Plan, so that a single, coherent approach applies to the development that Plan will bring forward (Doc. 4.2.44, section 4.4).

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<sup>9</sup> <https://www.greatercambridgeplanning.org/media/iyhbu05y/33-greater-cambridge-infrastructure-statement.pdf>



*Question 7: What is the basis for the estimated CIL income? Is this realistic?*

- 3.19 The Councils estimate that CIL based on previous levels of growth would generate at least £25m over five years but assume £50m on the basis of anticipated growth (Doc 3.3<sup>10</sup>, Chapter 8). No calculation is given for the uplift. Nor is it clear whether the estimate is net of the Section 106 contributions CIL will replace. If it is not, the actual gain to the programme may be only 50–75% of the stated figures (Doc. 4.2.44, section 4.3).
- 3.20 The Infrastructure Statement anticipates that the Cambridge Biomedical Campus alone could contribute significantly (Doc 3.3, Chapter 8). The income estimate therefore depends heavily on R&D development, the typology the Greater Cambridge; Community Infrastructure Levy Viability Assessment dated January 2026 (the “Viability Report”) has not tested (paragraphs 5.2–5.5). That reliance comes in a laboratory market where, on the Councils' own Local Plan evidence, vacancy doubled to 13% during 2025 (paragraph 5.32)
- 3.21 In answer to the Examiner's question, the basis for the estimate has not been demonstrated. It relies on an unexplained doubling of the base estimate, may not be net of displaced Section 106, and depends on income from a use whose viability has not been tested.

*Question 8: How much CIL income is estimated to be passed on to Parish Councils/Neighbourhoods? How does this affect the amount to be used on strategic transport infrastructure?*

- 3.22 The Councils confirm that 15% of receipts must be passed to parish councils, rising to 25% where a neighbourhood plan is in place (Doc 5.1<sup>11</sup>, p.38). The regulations also allow up to 5% to be retained for administration. Arrangements for the neighbourhood portion in Cambridge are still to be worked up (Doc 5.1, p.5).
- 3.23 On the Councils' £50m estimate, between £7.5m and £12.5m would pass to neighbourhoods, and up to £2.5m could be retained for administration. That would leave c. £35–£40m for strategic transport. It is not clear whether the “net CIL income” of £50m in Table 11 of Doc 3.3 already allows for these deductions. If it does not, the net funding gap is larger than stated.
- 3.24 By contrast, transport contributions secured through Section 106 are spent in full on the mitigation for which they are secured (Doc. 4.2.44, section 7).
- 3.25 In answer to the Examiner's question, up to 30% of receipts may not be available for strategic transport. Replacing Section 106 transport contributions with CIL would therefore reduce the sum reaching the transport programme from each development, while increasing the amount each R&D development pays.

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<sup>10</sup> <https://www.greatercambridgeplanning.org/media/iyhbu05y/33-greater-cambridge-infrastructure-statement.pdf>

<sup>11</sup> <https://www.greatercambridgeplanning.org/media/2amffspp/51-community-infrastructure-levy-consultation-statement.pdf>



## 4. Issue 7: Charging rate for offices and R&D

- 4.1 Doc. 4.2.44 asked the Councils to commission and publish an R&D-specific viability appraisal (sections 3, 6 and 8). None has been produced. The only further evidence is Quintic Advisory's note on the Offices/R&D rate (5 June 2026, within Doc 5.2<sup>12</sup>), which compares headline laboratory rents with the Viability Report's values but does not appraise laboratory development. The case for charging R&D at £175 per sqm therefore still rests on appraisals of two office building typologies, and a reliance on Oxford City Council's recently adopted CIL rate for office/R&D. This section responds to Questions 1–8. TCC supports Consortium Hearing Statement 3 on this Issue, including the Gardiner & Theobald cost benchmarking and Bidwells agency evidence appended to it. The following paragraphs add evidence specific to R&D development and the Cambridge Science Park.

*Question 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?*

- 4.2 The Viability Report tests two office typologies: 10,000 sqm on 0.40 ha (typology 29) and 15,000 sqm on 0.65 ha (typology 30). Both are four-storey buildings at a plot ratio of c. 2.3–2.5 (Doc 3.2, Table 4.1.1 and Appendix 2). Both are appraised using the BCIS cost for air-conditioned offices, a single office/R&D rent and yield, and an 85% net-to-gross ratio (Tables 4.9.1 and 4.11.1; Appendix 5).
- 4.3 These are urban office buildings. Cambridge is one of, if not the leading location within the UK for science, technology and innovation. The typologies that support this economy are multiple and varied. Even within the R&D sector, there is a significant range of typologies, from light R&D and incubator space to fully fitted wet lab facilities, to specialist containment-grade research buildings.
- 4.4 The Viability Report itself recognises that occupier demand is for "modern lab-enabled space" (para 2.39), and that much R&D floorspace will come forward in research parks (para 6.22). Yet no laboratory typology and no research park typology has been tested. TCC concurs with the Wellcome Genome Campus representations that campus-type life sciences development requires comprehensive placemaking and infrastructure that "cannot be compared to an individual office development" (Doc 4.2.49). The extent and scale of the live CSP outline planning application is testament to this where placemaking is at the heart of the project.
- 4.5 The omission is glaring. The LPVA tests a separate "Science Park" typology combining office and laboratory floorspace. It applies the BCIS "Research Facilities" cost of £3,835 per sqm to the laboratory space, separate values for laboratory and office floorspace, and an 8% yield on the office element (Bidwell's J/AW Note, sections 2 and 5). The Councils' 2020 Local Plan

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<sup>12</sup> <https://www.greatercambridgeplanning.org/media/2p0lmvj4/52-quintic-advisory-response-to-viability-representations.pdf>



viability evidence took the same approach, applying the BCIS research facilities cost to a "Science Park (R&D space)" typology. It is understood that Oxford's viability evidence derived its office typologies from extant permissions at Oxford Science Park and Oxford Business Park, at a plot ratio of c. 0.6 (Oxford City Council, Addendum to Economic Viability Assessment, May 2019, paras 3.2–3.7). As part of the Inspectors report on Oxford's charging schedule they noted as a result of concerns raised in the consultation, further site-specific R&D testing was required, with 18 additional sites tested, some in the city centre and others outside the centre. The Viability Report does none of this. The Councils have therefore commissioned two area-wide viability studies within six months, from two consultants, which treat R&D in fundamentally different ways, and have given no reason for the differences (Bidwell's J/AW Note, section 2).

- 4.6 The Viability Report and the Quintic note rely heavily on the similarities between the Cambridge and Oxford R&D sectors. They note that Oxford have recently adopted an R&D CIL rate of £175 per sqm, of a similar character as that proposed. However, within the Oxford City Council: Local Plan Viability Assessment Update dated December 2025 the following assumptions are adopted for R&D development:
- Rent of c. £77 per sq ft is adopted, in comparison to a rent of £57 per sq ft in the Viability Report
  - Yield of 4.75% is adopted, in comparison to a yield of 6% in the Viability Report
- 4.7 The revenue assumptions which therefore underpin the Oxford CIL rate are significantly more valuable than those proposed at Cambridge, yet Cambridge is ascribed the same CIL rate. This reinforces the need for additional site and R&D typology specific testing.
- 4.8 In answer to the Examiner's questions, the two office typologies may be a reasonable proxy for city-centre office buildings, but they do not reflect the R&D/ laboratory schemes actually being brought forward in Greater Cambridge. These schemes come forward in a range of different forms, none of which have been tested. The largest of these is the phased intensification of the Cambridge Science Park (paragraph 1.2). The R&D permissions in North East Cambridge referred to at paragraph 5.16 range from c. 9,000 sqm to over 83,000 sqm of net additional floorspace, and carry site-wide infrastructure, phasing and Section 106 obligations that a single urban building does not. Research campuses elsewhere, including Babraham, Wellcome Genome Campus and Granta Park, are of the same character. Because the typologies are appraised with office costs, office values and office net to gross efficiencies, they provide no evidence of the viability of R&D development. The Councils' own Local Plan evidence recognises that distinction; the CIL evidence does not.



Question 2: Is the assumption on build costs appropriate and sufficiently up to date?

- 4.9 The Viability Report adopts a BCIS base cost of £2,555 per sqm under the BCIS classification '320 Offices air conditioned generally' (c. £237 per sq ft), or £2,811 per sqm including external works (Table 4.11.1). With the net zero uplift (paras 4.14–4.17), that rises to c. £3,066 per sqm (c. £285 per sq ft). For the reasons at sections 5.2 and 5.3 of Doc. 4.2.44, this does not reflect laboratory construction. Purpose-built laboratory space typically costs significantly more to construct than offices, c. £4,840–£5,920 per sqm, which is c. £1,800–£2,900 per sqm above the Councils' assumption. The range is corroborated by various sources:
- (a) Gardiner & Theobald's benchmarking of 20 Cambridge schemes, derived from contract sums, tender returns and cost plans from 2019 to 2026, gives average build costs of £398 per sq ft for offices and £467 per sq ft for R&D and life sciences, excluding external works. Every scheme in the dataset exceeds the Viability Report's assumption (Consortium Hearing Statement 3, Issue 7, Question 2).
  - (b) BCIS reports £2,956 per sqm for research facilities (category 731.1) and £4,850 per sqm for laboratories (category 732), against the £2,555 per sqm office rate adopted (Lichfield's for CEG, Doc 4.2.17, para 1.30 – secondary source);
  - (c) cost data from six current Cambridge office and laboratory projects range from £364 to £464 per sq ft GIA, against the Viability Report's £261 per sq ft (Bidwell's, Doc 4.2.9 and others);
- 4.10 Quintic disagreed with the Bidwell's project data because the schemes were not named (Doc 5.2). Whilst it is normal to anonymise project specific data to protect client confidentiality, neither the BCIS laboratory category nor the Councils' own Local Plan evidence is open to that objection.
- 4.11 The Viability Report applies an 85% net-to-gross ratio to office and R&D floorspace alike (Appendix 5). For laboratory buildings, this is considered to be closer to 65-75%. For R&D schemes, the Viability Report therefore understates cost and overstates lettable area at the same time.
- 4.12 Quintic's response is that higher laboratory values "cover" the additional construction cost (Doc 5.2, R&D note, section 3). That proposition has not been tested:
- (a) no appraisal has been provided;
  - (b) the note substitutes laboratory values while retaining office costs and office efficiency;
  - (c) Quintic's own source (Carter Jonas) warns that headline laboratory rents vary with fitted condition and with GIA or NIA measurement;
  - (d) where the rents relate to fitted space, the cost of fit-out is not included in a BCIS shell-and-core cost. The cost of fit out for laboratory typologies, is significant and needs to be tested;



(f) the rents cited are prime rents, whereas achieved rents at research parks are materially lower (paragraph 5.28); and

(g) the Councils' own Proposed Submission Local Plan acknowledges that R&D space has high fit-out costs and "lower values" (supporting text to Policy J/AW, para 8.43).

- 4.13 DS2 has tested an R&D/ laboratory appraisal. The result is that the residual value for laboratory development is significantly lower than for the office typology, and at the proposed CIL rate, does not provide a sufficient buffer as required.
- 4.14 The Viability Report does not state the base date of its BCIS data, nor the quartile adopted (Doc 4.2.41, Appendix A). The office build cost in Appendix 5 (£2,708 per sqm) also appears to include a 6% net zero uplift, whereas para 4.17 states that 10% has been applied.
- 4.15 In answer to the Examiner's question, the build cost assumption is not appropriate for R&D typologies. The deficiencies in this approach are a combination of both a) the rate itself, but also b) the overall efficiency. To understate the former, but overstate the latter, cumulatively results in a significant over-exaggeration of viability. The BCIS office rate may be a reasonable basis for air-conditioned offices. It is not a basis for laboratory or R&D buildings, which cost c. £1,800–£2,900 per sqm more and deliver materially less lettable floorspace. Quintic's answer, that higher values absorb higher costs, is an assertion rather than an appraisal, and needs to be subject to site specific testing to confirm whether this is the case – DS2's initial testing of a laboratory typology suggests this is not the case.

*Question 3: Is the increase for external works appropriate?*

- 4.16 The Viability Report adds 10% to base build costs for commercial external works, including car parking (para 4.12). Quintic confirms that this allowance covers on-site plot costs (Doc 5.2, response to Savills). For laboratory schemes, on-site plot costs typically include additional costs associated with enhanced substations, gas storage compounds and servicing yards. Depending on the science being undertaken these external works can vary from building to building and occupier to occupier. Applied to an office base cost, a 10% allowance understates these costs. On research parks, phased site-wide infrastructure also falls outside any plot-level percentage. The Viability Report makes a separate allowance of £29,070 per unit for utilities upgrades, estate roads and related infrastructure on larger edge-of-settlement residential schemes (para 4.13) but makes no equivalent allowance for out-of-centre commercial development. As part of further specific R&D typology testing, an allowance for commercial external works/ infrastructure should be agreed based on benchmarking data, both for city centre and out-of-town typologies.
- 4.17 In answer to the Examiner's question, the 10% allowance is not appropriate for R&D development. It is an office allowance applied to an office base cost. It makes no provision for the on-site servicing that laboratory buildings require. Nor does it provide for the site-wide infrastructure of science, innovation and research parks, where the Viability Report itself



expects a significant proportion of R&D floorspace to come forward (para 6.22), even though the report recognises the equivalent cost for large residential sites.

*Question 4: What is the basis for the assumptions on S106 costs and are they realistic and appropriate?*

- 4.18 The Viability Report assumes residual Section 106 costs of up to £25 per sqm for non-residential development (para 4.26). The Councils cite 440 Cambridge Science Park (24/01079/FUL) as evidence of affordability, where £860,255.50 was secured towards the Milton Road corridor and the Chisholm Trail (Doc 5.1, p.40). On net additional floorspace of 11,135 sqm, that equates to £77.26 per sqm. That sum covered both strategic and local transport mitigation, so it is not comparable with a CIL charge replacing only the strategic element.
- 4.19 Transport contributions negotiated for R&D development in North East Cambridge over the last five years, covering both strategic transport (which CIL would replace) and local measures, are:
- a) St John's Innovation Park (20/03523/FUL), £821,000 on 12,440 sqm<sup>13</sup> net additional floorspace, equating to £66.00 per sqm.
  - b) Vitrum (23/01487/FUL), £722,685 on 12,301 sqm, equating to £58.75 per sqm.
  - c) Merlin Place (23/00835/FUL), £460,833 on 9,036 sqm, equating to £51.00 per sqm.
  - d) 210-240 Cambridge Science Park (24/04575/FUL), as reported to committee on the 15th October 2025: £5,105,929 on 83,172 sqm, equating to £61.39 per sqm.
  - e) Trinity Hall Farm (25/00016/FUL), as reported to committee on the 19th November 2025: £1,649,285 on 34,048 sqm, equating to £48.44 per sqm.
- 4.20 These contributions have averaged c. £60 per sqm, and some have included local measures. Under the Charging Schedules, local measures would still be secured through Section 106 in addition to CIL (Doc 5.1, pp.32–33). The proposed rate of £175 per sqm, for strategic transport alone, is therefore around three times the total transport contribution R&D development in North East Cambridge has actually made.
- 4.21 The increase is clearest on the two largest schemes. At 210–240 Cambridge Science Park and Trinity Hall Farm, negotiated contributions total c. £6.8m. The equivalent CIL liability would be c. £20.5m<sup>14</sup>, before any local mitigation. Quintic dismisses a comparable figure as a minor addition to cost (Doc 5.2, response to Bidwell's on behalf of Brockton Everlast). Liabilities of

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<sup>13</sup> Net additional floorspace for each taken from Planning Application Forms.

<sup>14</sup> Note £20.5m comes from 117,220 sqm × £175 before indexation. Bidwells' representations on behalf of Brockton estimate £19m and used an increase in floorspace of 112,345 sqm.



the same order arise on other schemes now in the planning system, including over £6m on the Babraham Research Campus outline application (Doc 4.2.4).

- 4.22 The Councils' reliance on 440 Cambridge Science Park therefore says nothing about whether a fixed charge of £175 per sqm is viable across R&D development generally.
- 4.23 The Councils state that strategic sites need not be nil rated because all of them already have planning permission (Doc 5.1, p.25). That is not the case at the Cambridge Science Park, where the outline application for up to 771,000 sqm remains undetermined. Nor is it the case for research campuses proposed for allocation in the emerging Local Plan, such as the extension to Babraham Research Campus (Doc 4.2.4). TCC's position on strategic sites is set out at section 7 of Doc. 4.2.44 and at paragraph 3.13.
- 4.24 TCC does not oppose pooled contributions. Its Local Plan representations support pooled contributions towards the North East Cambridge transport measures identified in the Infrastructure Delivery Plan and NEC Transport Position Statement. Those contributions would be tied to a site-specific trip budget and secured through Section 106 (Policy S/AMC/NEC). That mechanism directs contributions to measures that mitigate the development concerned, in the order they are needed. A generic levy, part of which will be passed to neighbourhoods and the rest spent across the GCP programme, does not (paragraphs 3.21–3.24).
- 4.25 In answer to the Examiner's question, the £25 per sqm allowance has no evidential basis.
- The Viability Report presents it as a general allowance for "residual" obligations, while the Councils intend Section 106 to continue to secure "the bulk of contributions towards infrastructure" (para 4.26).
  - It is not derived from any analysis of obligations actually secured on R&D development, although the Councils hold that evidence (Doc 5.1, Appendix A; paragraphs 5.15–5.17).
  - It makes no distinction for large out-of-town commercial schemes, although £46,000 per unit is allowed for strategic residential sites.
  - It is inconsistent with the LPVA, which assumes planning contributions and infrastructure costs of £146 per sqm on all commercial development, nearly six times as much (Bidwell's J/AW Note, section 2).
  - The Councils have not separated the strategic element, which CIL would replace, from the local and non-transport obligations that will continue, as the Westbrook Centre example shows (Doc 5.1, p.33).
  - The Proposed Submission Local Plan adds further Section 106 obligations for R&D development: affordable workspace (Policy J/AW), energy offsetting (Policy CC/NZ) and employment and skills plans (Policy WS/IO).
  - The Councils have not explained whether the emerging Plan's infrastructure requirement, on which the LPVA's £146 per sqm is based, includes strategic transport



schemes CIL would fund. If it does, the same development would pay for the same infrastructure twice.

- 4.26 The assumption is therefore neither realistic nor appropriate for R&D development, and the Councils have not shown that £175 per sqm CIL plus realistic continuing obligations can be viably absorbed.

*Question 5: What is the basis for the approach to benchmark land values and is this appropriate?*

- 4.27 The Viability Report supports the office/R&D rate in part on the basis that much R&D floorspace will come forward on greenfield research parks, where benchmark land values are low (para 6.22). That is not the position at the Cambridge Science Park, where growth will come from intensifying an established park of c. 250,000 sqm of occupied, income-producing floorspace. Intensification carries existing use values, and lost income, that greenfield benchmarks of £250,000–£370,000 per hectare do not reflect (Doc 3.2, para 4.35). The report's higher benchmark, for secondary offices, is the closest proxy, but is itself based on lower-quartile rents that do not reflect an established science park either. The LPVA also fails to address this omission. It tests its science park typology on a greenfield basis only, using a land value carried over from its residential assumptions, and does not test brownfield intensification of existing parks (Bidwells J/AW Note, sections 2 and 6). This further reinforces the need to test in detail R&D typologies.
- 4.28 In answer to the Examiner's question, the approach is not appropriate for much of the R&D development in the Councils' pipeline. The maximum rates at the greenfield benchmarks (£851–£857 per sqm) should be given little weight in judging the R&D rate, because they relate to sites unlike those on which much R&D will come forward.

*Question 6: Are the assumptions on rental income appropriate?*

- 4.29 The Viability Report applies a single set of values to offices and R&D: £615 per sqm (c. £57 per sq ft), a 6% yield and a 24-month rent-free period (Table 4.9.1).
- 4.30 Third-party evidence shows that even this value is above rents achieved outside the prime city centre:
- (a) Newsteer reports a letting at One Zero One, Cambridge Science Park, at c. £377 per sqm (Doc 4.2.21);
  - (b) Bidwells reports achieved rents at Cambridge Research Park of c. £301 per sqm for offices and c. £495 per sqm for fitted laboratories (Doc 4.2.9);
  - (c) Lichfields' analysis of CoStar data gives mean rents of £343 per sqm at Cambridge Science Park and £174 per sqm at Babraham Research Campus (Doc 4.2.17, Table 1.2); and



- (d) Bidwells reports a 2,880 sqm shell-and-core laboratory letting at the Orion Building, Unity Campus (a science park named in Policy J/AW) at £473 per sqm ft (Bidwells J/AW Note, section 2).

- 4.31 Quintic relies instead on prime headline figures for City centre and does not address this evidence, nor the disparity between city centre and science park rents (Doc 5.2).
- 4.32 The market evidence Quintic cites shows Cambridge and Oxford laboratory rents to be broadly comparable. As noted, the revenue assumptions differ significantly between the Oxford and Cambridge evidence. Oxford's rate was set on evidence that appraised a series of R&D typologies with R&D-specific inputs (Doc. 4.2.44, section 5.3). Oxford's evidence also derived office rents from actual lettings, and tested typologies drawn from its own science and business parks. The Viability Report does none of this: the Councils have borrowed Oxford's rate without applying Oxford's method. They also have not published the Oxford Viability Appraisals as part of this consultation, making it difficult for interested parties to understand the evidence base the CIL rates are based on.
- 4.33 If laboratory values are relied upon, laboratory costs and efficiency must be applied with them (paragraph 5.9). The Councils' own Proposed Submission Local Plan describes R&D space as having "lower values" (Policy J/AW, para 8.43). The LPVA applies a 5-5.5% yield to office and 5% for lab floorspace within its science park typology, against the Viability Report's 6%.
- 4.34 In answer to the Examiner's question, the rental assumptions are not appropriate for R&D. A single office value has been applied to two different products, and that value is above rents achieved at the science and research parks where R&D is expected to come forward. The Councils' consultants now rely on laboratory rents and yields that differ materially from the Viability Report's, without appraising laboratory development on that basis. They cite headline rents without allowance for incentives or voids, in market the Councils' own evidence describes as having rising vacancy. The Councils cannot adopt laboratory values to support the rate while retaining office costs and office efficiency.

*Question 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?*

- 4.35 The Viability Report includes a net zero allowance (paras 4.14–4.17; Doc 5.2), drawn from studies which identify additional costs of 1–4% for offices. None of the cited evidence relates to laboratories, which are among the most energy-intensive commercial buildings, and the allowance is applied to an office base cost. It was also set against the Regulation 18 draft of Policy CC/NZ. The Proposed Submission version (August 2026) requires non-domestic buildings to:
- meet a space heating demand of 15–20 kWh per sqm per year;
  - avoid fossil fuel heating;



- meet all energy demand through on-site generation, with any shortfall offset through developer contributions; and
- for research facilities, meet energy use intensity targets equivalent to the UK Net Zero Carbon Buildings Standard 2030.

- 4.36 For laboratories, whose process energy cannot realistically be met on site, offsetting will be a significant additional cost that has not been tested. The report also assumes that water efficiency (Policy CC/WE) costs nothing because it can be met through "shower and tap fittings" (Appendix 1). That these do not apply to laboratories, where water supply constraints add cost (Doc 4.2.17, para 1.30).
- 4.37 The Viability Report identifies emerging Policy J/AW (affordable workspace) as having cost implications (Table 2.35.1), but the office appraisals appear to make no allowance for it (Appendix 5). The Proposed Submission version requires office and R&D development over 1,000 sqm to provide at least 10% of net additional floorspace as affordable workspace. Within Cambridge and at named science and business parks, including the Cambridge Science Park, it must be let at least 30% below market rent in perpetuity. The application of affordable workspace needs to be included as part of office and R&D testing, however when combined with the increased R&D/ laboratory costs, and reduced efficiency, DS2 question whether a sufficient buffer exists. The supporting text allows a lower proportion for R&D where viability requires (para 8.43), but only case by case through a viability assessment. A fixed CIL rate cannot adjust in the same way.
- 4.38 The LPVA does not address the flaws in the Viability Report. The Bidwells J/AW Note identifies the following:
- (a) it tests affordable workspace at 20% of floorspace and a 40% discount throughout, double the policy requirement, so no results are reported at the policy requirement;
  - (b) it applies a laboratory rent of £753 per sqm and a prime yield of 5.25% uniformly across the Plan area, above rents achieved at named science parks (paragraph 5.28(d));
  - (c) its benchmark land values are carried over from residential assumptions;
  - (d) its net zero allowance derives from Essex evidence;
  - (e) its £146 per sqm infrastructure cost is derived from a funding requirement rather than actual obligations;
  - (f) it tests science parks on a greenfield basis only; and
  - (g) it adopts profit of 15% on cost, c. 13% of GDV, below the range in national guidance.
- 4.39 Although the LPVA includes CIL as a cost line, it does not test the Plan's requirements alongside a CIL rate different from the one it assumes. The Viability Report, in turn, tests the CIL rate without the Plan's requirements. The cumulative cost of affordable workspace, net zero, water efficiency, 20% biodiversity net gain and local transport mitigation on R&D intensification, with



CIL on top, has therefore not been demonstrated by either evidence base (TCC's Local Plan representations, Policy J/AW). Any reliance by the Councils on the LPVA to support the R&D rate is subject to each of these defects.

- 4.40 The Viability Report adopts profit of 15% of GDV, professional fees of 7% and finance at 7% (paras 4.20, 4.21 and 4.31). The 7% fee allowance reflects housebuilder practice. The LPVA itself adopts 10% for commercial development. The office appraisals in the Viability Report also assume an 18-month build period (Appendix 5), whereas the Councils' 2020 Local Plan evidence assumed 24 months for science parks (paragraph 5.4). This understates finance costs. The LPVA similarly overstates net to gross efficiency, adopting 85% in line with the Viability Report.
- 4.41 The Councils have confirmed that they will offer neither exceptional circumstances relief nor discretionary charitable relief (Doc 5.1, p.40). Exceptional circumstances relief is only available if the charging authority makes it available, so declining to do so removes the safeguard entirely. R&D development has no equivalent to the affordable housing adjustment available to residential schemes. Unlike a Section 106 agreement, a CIL rate cannot be revisited without a further examination. If the rate is set wrongly for R&D, nothing will correct it.
- 4.42 The mismatch described at paragraph 1.5 is sharpest for R&D. The Councils rely on guidance that, where CIL follows an adopted plan, its viability evidence may build on that plan's evidence (Doc 3.1, section 4). They have not done that. The Viability Report tests the Regulation 18 draft of a plan not yet adopted, so it reflects neither the policy costs in force nor those the Councils now propose. Meanwhile, the LPVA assumes contributions of £146 per sqm towards the emerging Plan's infrastructure, separately from CIL. CIL is proposed to be charged £175 per sqm towards the 2018 Plans' transport programme, which the GCP is due to complete by 2030, while also contributing to the emerging Plan's infrastructure. Neither evidence base tests that combined burden.
- 4.43 In answer to the Examiner's questions:
- Emerging Local Plan requirements have been taken into account in form (Doc 3.2, Appendix 1), but costed by reference to residential and office evidence, and against a Regulation 18 draft since superseded.
  - The net zero uplift does not reflect the on-site generation and offsetting now proposed, and water efficiency is assumed to cost nothing.
  - Affordable workspace, which the Viability Report identifies as a cost, has not been appraised at all. The Local Plan evidence neither tests it at the policy requirement nor tests the Plan's requirements alongside alternative CIL rates.
  - Fees are lower than the Councils' own Local Plan evidence assumes, and the build period is too short for laboratories.



- 4.44 The result is a charge whose viability evidence matches neither the adopted Plans nor the Plan the Councils intend to adopt. With no relief mechanism to correct an error (paragraph 5.40), these assumptions are not an appropriate basis for charging R&D development.

Question 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?

- 4.45 The rate is justified by reference to Oxford (Doc 3.2, para 6.23), supplemented by an outline planning application submitted in Oxford (Doc 5.1, p.21). Oxford's rate was examined against Oxford's evidence, which tested typologies drawn from its own science and business parks (paragraph 5.4). It cannot substitute for testing R&D in Greater Cambridge, and an outline application is not evidence of delivery. The Oxford rate also applies only to the city. In South Oxfordshire, the closer comparator for much of South Cambridgeshire, viability evidence showed that office development could not support CIL.
- 4.46 The Viability Report's maximum rates of £422–£857 per sqm (Appendix 5) relate to the two office typologies. No maximum rate has been identified for R&D, so no buffer can be demonstrated for it. DS2 has rerun the office appraisal with the laboratory inputs, and the results suggest that City centre R&D cannot support the same level of CIL and retain the necessary buffer. For science park typologies, viability is further constrained. However, these conclusions should be similarly subject to site and R&D typology specific testing.
- 4.47 In answer to the Examiner's questions, the £175 per sqm rate may be supported for offices by the Viability Report, but it is not justified for R&D, and no sufficient buffer has been demonstrated for R&D.
- For offices, the rate sits at c. 40% of the lowest maximum rate. However, that buffer is calculated without the affordable workspace requirement the Councils propose to apply to the same buildings. Once that is included, the buffer narrows substantially (paragraph 5.36).
  - For R&D, no maximum rate has been calculated, so there is nothing against which a buffer can be measured.
  - The rate derives from a comparison with Oxford rather than from any appraisal of R&D in Greater Cambridge. The only appraisal of R&D the Councils have produced, in the LPVA, rests on contested assumptions and was prepared for a different purpose.
  - Nor is the rate anchored in either plan. It would fund the 2018 Plans' transport programme, which will be superseded within months, using viability evidence tested against a draft of the Plan that will replace them (paragraph 1.5).
  - The only third-party appraisal evidence before the Examination indicates that the rate is not sustainable for R&D.



## **5. Summary of TTC's suggested amendments**

- 5.1 TCC's primary position remains that the Charging Schedules need more work to establish the baseline facts and as such should not be adopted in this form at this time. Developer contributions should instead be revisited alongside the emerging Local Plan and its infrastructure evidence, so that a single, coherent approach applies to the development that Plan will bring forward (Doc. 4.2.44, sections 3 and 4.4; paragraphs 1.5–1.6 and 3.17).
- 5.2 If the Examiner is nevertheless minded to recommend approval, TCC requests that the Examiner recommend:
- 5.3
- (a) that R&D be separated from offices and charged at a rate supported by an R&D-specific appraisal and likely to be significantly lower than offices alone (Section 5);
  - (b) that strategic sites, including the Cambridge Science Park, be nil rated, with their mitigation secured through Section 106 (paragraphs 3.13–3.14 and 5.21–5.22); and
  - (c) that a policy for infrastructure payments in kind under Regulations 73 and 73A, relating to strategic transport, be in place when the Charging Schedules take effect (Doc 5.1, p.41; Doc 4.2.12).
  - (d) that the Councils adopt an Exceptional Circumstances Relief policy under Regulation 55 when the Charging Schedules take effect (paragraph 5.40).
- 5.4 We would welcome further discussions to establish a way forward should that be necessary.

**End.**

Produced by: Tom Horne

Approved by: Tom Horne



Date: 02 October 2026

| Ref        | Full Title                                                                                                                                                                          |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Doc 3.1    | Cambridge City Council and South Cambridgeshire District Council, <i>Community Infrastructure Levy Supporting Statement</i> (January 2026)                                          |
| Doc 3.2    | BNP Paribas Real Estate for Greater Cambridge Shared Planning, <i>Greater Cambridge: Community Infrastructure Levy Viability Assessment</i> (January 2026)                          |
| Doc 3.3    | Cambridge City Council and South Cambridgeshire District Council, <i>Community Infrastructure Levy Infrastructure Statement</i> (January 2026)                                      |
| Doc 4.2.4  | Bidwells on behalf of UKRI (Babraham Research Campus), representations on the South Cambridgeshire Draft CIL Charging Schedule (26 March 2026)                                      |
| Doc 4.2.9  | Bidwells on behalf of Brockton Everlast, <i>Representations on Draft Cambridge CIL Charging Schedule</i> (27 March 2026)                                                            |
| Doc 4.2.12 | Cambridge Growth Company, response to the Community Infrastructure Levy Consultation for Cambridge City Council and South Cambridgeshire District Council (1 May 2026)              |
| Doc 4.2.17 | Lichfields on behalf of CEG Land Promotions Limited, <i>Representations to the Greater Cambridge Draft CIL Charging Schedule</i> (27 March 2026)                                    |
| Doc 4.2.21 | Gonville & Caius College, <i>Greater Cambridge Community Infrastructure Levy (CIL) Draft Charging Schedule</i> representations, with the Newsteer report at Appendix A (March 2026) |
| Doc 4.2.41 | Stantec on behalf of Royal London Asset Management, <i>Greater Cambridge: Draft Community Infrastructure Levy Consultation Response</i> (27 March 2026)                             |
| Doc 4.2.44 | DP9 on behalf of Trinity College Cambridge, <i>Greater Cambridge: Draft Community Infrastructure Levy Consultation Response</i> (29 March 2026)                                     |
| Doc 4.2.48 | Representations on behalf of Waterbeach Development Company, <i>Waterbeach New Town East: Greater Cambridge Draft CIL Consultation</i> (March 2026)                                 |
| Doc 4.2.49 | Representations on behalf of Wellcome Genome Campus Limited, <i>Community Infrastructure Levy Consultation response</i> (27 March 2026)                                             |



|            |                                                                                                                                                   |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| Doc 4.2.50 | Bidwells on behalf of Wrenbridge Land, <i>Representations on Draft Cambridge CIL Charging Schedule</i> (27 March 2026)                            |
| Doc 5.1    | Cambridge City Council and South Cambridgeshire District Council, <i>Community Infrastructure Levy Consultation Statement</i> (June 2026)         |
| Doc 5.2    | Quintic Advisory, <i>Greater Cambridge CIL: Review of Representations</i> (18 May 2026), including the note on the Offices/R&D rate (5 June 2026) |
| Doc 6.4    | Greater Cambridge Planning Obligations Supplementary Planning Document (Version for Adoption - February 2026)                                     |

*Sources cited without a CIL Examination Library Doc reference*

- TCC's Local Plan representations: representations on the Proposed Submission Greater Cambridge Local Plan (September 2026).
- The Bidwells J/AW Note: Bidwells, Regulation 19 representations on Policy J/AW (Affordable Workspace) on behalf of a consortium of commercial developers (September 2026), appended to TCC's Local Plan representations.
- The LPVA: Aspinall Verdi, Greater Cambridge Local Plan Viability Assessment (July 2026), including its Commercial Paper.
- The Proposed Submission Plan: Greater Cambridge Shared Planning, Proposed Submission Greater Cambridge Local Plan (August 2026), in particular Policies J/AW, CC/NZ, CC/WE, WS/IO, J/EP and S/AMC/NEC.
- The 2020 Local Plan viability evidence: Aspinall Verdi, Greater Cambridge Local Plan Strategic Spatial Options Viability Assessment (November 2020).
- The Oxford Addendum: Avison Young for Oxford City Council, Addendum to Economic Viability Assessment 2018 (May 2019).

