Community Infrastructure Levy
Consultation
Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne,
CB23 6EA

27 March 2026

WEL001/hpf

Dear Sirs

**RE: COMMUNITY INFRASTRUCTURE LEVY CONSULTATION, Response on behalf of Wellcome Genome Campus Ltd**

These representations are made on behalf of Wellcome Genome Campus Limited (WGCL). WGCL is the owner-developer-operator of the Wellcome Genome Campus and its on-going expansion, as a globally-significant discovery and translational bioscience and technology destination, ecosystem and community.

The current Campus of 125 acres is expanding to 440 acres, within 1,000 acres of Wellcome-owned land. The Campus is evolving from a closed, gated workplace into an open, welcoming place and destination. Increasingly, the Campus will have the characteristics of a growing town, one with a clear purpose derived from its science mission.

This ambition is intrinsic to both the substantial scale of development now underway on the 'expansion land' to the east of the A1301 and the priority WGCL is now directing towards modernising the existing Campus, west of the A1301. WGCL is bringing these areas together as an open, diverse and connected place, one that puts people first, fosters collaboration and innovation and supports a shift to active travel.

The expanding Campus has an important role to play in the growth and success of Greater Cambridge, not least as a location for life sciences of national and global significance.

The delivery of efficient and effective strategic transport infrastructure is central to this and funding this infrastructure in a successful and timely manner is paramount.

It is in this context that WGCL submits these representations.

WGCL has set out a limited number of significant concerns in relation to the imposition of CIL. As a member of Cambridge Ahead, WGCL is broadly aligned with its position on this consultation and supports the messages in the Cambridge Ahead submission.

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**Question 3: Do you agree that the Council should introduce CIL?**

No.

WGCL is fully aligned with the ambition for growth and as a key stakeholder and potential investor, feels passionately about seeing the full potential of Greater Cambridge realised. We understand the challenges to growth, not least the constraints of proper strategic transport infrastructure and understand the potential value of CIL as a possible mechanism to fund strategic infrastructure.

WGCL is concerned about the impact of CIL on the deliverability and viability of development. The current economic climate is challenging, and commercial development in particular is sensitive to economic cycles and changes in demand, competition, rents, yields, debt availability, land and other costs. Having a CIL charge (at the proposed rate), in uncertain conditions could have the effect of constraining development altogether.

Further, CIL rates cannot be easily reviewed – a full examination process is generally required and so a CIL charge is absolute, it provides little opportunity to be responsive to challenges and changes in the economy / market. To the contrary, Outline Permissions with a s106, whilst legally binding, have mechanisms that enable review in exceptional circumstances.

Even if CIL does not have this damaging effect, the mechanics are such that it will not contribute meaningfully to support wider growth. Receipts from emerging site allocations will only arrive at some distant time into the future. Thus, relying on CIL to deliver strategic infrastructure projects required now, is challenging, with little control over obtaining the funding and limited ability to forward plan for such infrastructure projects.

**Question 5: Do you agree that the Council has used appropriate evidence to inform the proposed rates?**

No.

WGCL has serious concerns regarding the viability report and the evidence on which the proposed rates are based. Comparison is made to Oxford whereby the CIL rate for office / R&D has recently increased substantially from £33 - £168 per m2. The work we have seen does not provide a robust basis for a new CIL in Greater Cambridgeshire.

The evidence base and resultant proposed rates group together offices and R&D. The same rental values, yields and rent free periods are assumed. That is dangerous and wrong.

Similarly, the indicative build costs used do not recognise wet labs or other categories of R&D, which have a completely different build cost profile and indeed rental tone to offices.

For greenfield sites, we simply do not recognise the adopted benchmark land values of between £0.25 million and £0.37 million per gross hectare.

Further, the nature of the campus type developments for many life sciences schemes around Cambridge, requires a comprehensive approach to placemaking and a multitude of infrastructure requirements aligned with campus and community building. This cannot be compared to an individual office development and none of this has been taken into account.

We see no properly evidenced case that R&D should incur the same rate as offices and thus, the rate itself is not appropriately justified.

If CIL is implemented across Greater Cambridgeshire, it is essential that proper regard is had to the characteristics of life science campuses, these are bespoke and it is important that the evidence base reflects this.

**Conclusion**

Given the limited funds CIL would provide and the period over which they would be available, and weighing this against the risk to viability of development and in turn the wider economy, we do not see sufficient or proper justification for the introduction of CIL.

WGCL has also provided a response to the Government's consultation for an Urban Development Corporation in Greater Cambridge. This could transform the basis on which strategic infrastructure would be planned for and delivered. The WGCL response on the UDP reflects more widely on the financial constraints facing the area in realising its full growth potential and the much greater opportunities that could be provided if, as suggested by the Chancellor in her recent Mais lecture, the Government embarks on a "roadmap for fiscal devolution".

Given the extent of change and opportunity facing Greater Cambridge, in light of its national and international significance, the imposition of CIL now is not an appropriate response to funding the infrastructure we need.

Yours sincerely,

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SENIOR ASSOCIATE

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cc: Robert Evans, WGCL