

Gonville & Caius College

Greater Cambridge

Community Infrastructure Levy Examination

Written Statement

2 October 2026

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1 INTRODUCTION

- 1.1 This Written Statement is submitted by Gonville & Caius College, University of Cambridge ("Caius"). Caius is a Registered Charity and significant landowner within Greater Cambridge, holding a diverse portfolio encompassing its core educational estate alongside agricultural, residential, and commercial land and property holdings.
- 1.2 Caius with its partners Imperial War Museums (IWM Duxford) and Henry Boot Development (HBD) is shortly to submit an application for circa 50,000 sqm of advanced technology space at IWM Duxford along with a new bespoke IWM Duxford conservation and storage facility. Caius and Imperial War Museums are both registered charities and will retain the freehold of the development site,
- 1.3 Turley on behalf of IWM Duxford made representations on the proposed Community Infrastructure Levy (CIL) Charging Schedule. Twenty-Five also made also made representations on behalf of HBD.
- 1.4 In addition over the next 10 years Caius is planning to bring forward circa 3000 new homes within Greater Cambridge and a major development in Cambridge City Centre largely to provide new student facilities, all on land owned by the College.
- 1.5 Caius manages its assets to maintain investment into its College educational programmes and buildings, including new student accommodation and continuing to offer discounted student accommodation rents.
- 1.6 For these reasons it is very interested in and as set out below concerned over the proposed introduction CIL and its charging schedule.
- 1.7 The College has reviewed the Inspector's Issues and Questions and sets out Caius' concerns over the proposed Community Infrastructure Levy (CIL) Charging Schedule in the order of the Inspector's questions.

2 ISSUE 1: LEGISLATIVE REQUIREMENTS AND CONSULTATION

- 2.1 Charitable Relief does not appear in the Inspector's issues/questions. It is, however, a matter of significant concern to Caius, and we assume to many other local Registered Charities, as to how the charging authorities intend to apply relief for charitable bodies under the Community Infrastructure Levy Regulations 2010 (as amended).
- 2.2 Quintic's (ex BNP) response (May 2026) to the Caius CIL representations on charitable relief states... *"The Authority does not need to refer to mandatory charitable relief as it is mandatory. Assuming that G&CG meet the criteria set out for this relief in the CIL regulations, then they will be able to benefit from it. The Authority cannot seek to disapply mandatory charitable relief."*
- 2.3 The BNP/Quintic response only refers to Mandatory Relief. There are, however, other very relevant CIL regulations to be considered.

- 2.4 **Regulation 43 deals with Mandatory Charitable Relief** and sets out that a Registered charitable body is exempt from CIL liability where the chargeable development will be used wholly or mainly for charitable purposes. Caius understands this constitutes a statutory right triggered by the applicant and does not rely on this being within a charging schedule or other local policy statement in order to be available.
- 2.5 **Regulation 44 deals with Discretionary Charitable Investment Relief.** This sets out that a charitable institution with a material land interest is eligible for relief from CIL liability if a) discretionary charitable relief is available in the area; and b) the whole or the greater part of the chargeable development will be held by the charitable institutions (or along with other charitable institutions) as an investment from which the profits will be applied for charitable purposes.
- 2.6 **Regulation 55 deals with Exceptional Circumstances Relief.** This empowers a Charging Authority to completely waive or scale back standard CIL fees for any developer if the strict application of the levy would render a critical, policy-compliant project financially unviable.
- 2.7 Caius understands that whilst Reg 43 is Mandatory and available in all relevant cases, Reg 46 sets out that Reg 44 (discretionary charitable) and/or Reg 55 (exceptional) relief are only available if the charging authority gives notice that the relief is available in the area. The notice/statement must state the exact date from which the collecting authority will begin accepting claims for the relief and include a policy statement setting out the precise circumstances and criteria under which the discretionary relief will be granted.
- 2.8 We would strongly argue that the charging authorities adopt Discretionary Charitable and Exceptional Circumstances Relief under the CIL Regulations.
- 2.9 If the charging authorities intend that only Reg 43 Mandatory Relief applies, then this is a matter of considerable concern with potentially significant implications.
- 2.10 Registered charities like Caius rely heavily on revenues generated by their investment estates to cross-subsidise and directly fund essential educational infrastructure, the ongoing maintenance of their historic heritage assets, the delivery of new student accommodation and maintenance of discounted student rents. To not have this relief could therefore have significant implications not only for the College, but for its students, the University, and Cambridge as a whole.
- 2.11 Our development at Duxford is being undertaken jointly with Imperial War Museums, also a registered charity, for whom the revenues are key to the future of IWM Duxford as a visitor attraction and home to historic aircraft.
- 2.12 Caius therefore respectfully asks the Inspector to ensure that:
- Reg 44 and Reg 55 relief is made available by the charging authorities;
 - the charging authorities give notice that Reg 44 and Reg 55 relief will be available at the date CIL comes into force and that they publish a notice/statement of policy setting out eligible dates and application procedures; and
 - the charging authorities recognise that the charitable institution as landowner will often work with development partners (whilst retaining the land freehold) in order to optimise development returns for charitable purposes.

- 2.13 Caius is bringing forward substantial projects in the City Centre, Duxford and Milton which will be phased over a number of years. We request that charging authorities extend the final payment window in the **instalments policy** to 16 months in respect of projects with a CIL Liability of over £500,000 as this will assist with developer cash flow, recognising many **large sites will be multi-phased** over many years, and each individual phase will **trigger its own separate CIL liability upon its specific commencement date**.

3 ISSUE 2: INFRASTRUCTURE REQUIREMENTS AND FUNDING

- 3.1 Strategic Transport Infrastructure - Caius is concerned that critical infrastructure required to release some proposed Regulation 19 sites may not be in place and/or in time. Furthermore, the overall funding package may not be sufficiently up to date regarding the interplay between Section 106 (S106) agreements, CIL, government funding, and other agency investment packages.
- 3.2 Double Counting, Funding Duplication, and Policy Overlap - Under the Reg 122 “three tests” set out in the CIL Regulations, local authorities cannot double charge from S106 and CIL sources to pay for the same piece of infrastructure.
- 3.3 Paragraph 1.8 of the BNP Paribas Viability Report (January 2026) states that the authorities intend that CIL will be used solely to fund strategic transport infrastructure, with S106 being the main charge and means of securing obligations dealing with affordable housing, all other infrastructure, education, open space, community facilities, utilities, biodiversity, and site-specific works.
- 3.4 This approach appears significantly different from many charging situations (such as Oxford City Council - also advised by BNP), where councils that have adopted CIL see it as the primary source of charging.
- 3.5 However, this “clear” dividing line seems at odds with the recently adopted (April 2026) Greater Cambridge Planning Obligations SPD (Para 10.14) which says: *“Obligations will be sought where.... there is a need generated for strategic transport improvements including measures to promote walking, cycling, public transport and highways traffic calming and capacity improvements”*, i.e. off-site strategic infrastructure. The SPD at Para 10.21 gives further details of *“strategic transport interventions”*.
- 3.6 As such, if a developer is required by S106 to deliver an off-site junction upgrade to mitigate its site's traffic, and then also forced to pay the flat-rate CIL for “strategic transport”, they would be effectively paying twice for transport capacity.
- 3.7 Caius considers there is potential for overlap and double counting across S106 planning obligations and the proposed CIL charges in Greater Cambridge. This creates a clear risk of “double dipping” for the same infrastructure assets.
- 3.8 In addition, new and in our view onerous and potentially unsound obligations are carried forward from the SPD into the Regulation 19 Greater Cambridge Local Plan policies:
- Affordable Workspace: A mandatory requirement for a minimum of 10% affordable workspace on eligible commercial/employment schemes (with significant market discounts between 20% and 30% in perpetuity) is set out, but in our view not robustly evidenced;
 - Biodiversity Net Gain (BNG): A 20% BNG target is set out, which doubles the national

statutory mandate of 10%, with no robust evidence of how this would impact on different development typologies and locations.

- 3.9 Overlap concerns may also arise with the creation of the Greater Cambridge Development Corporation (GCDC). We assume the GCDC will negotiate and execute S106 obligations for the applications it determines, but the local authorities will independently remain the CIL charging authorities.
- 3.10 Splitting infrastructure and funding negotiations across separate bodies will at the very least prolong timelines but also introduce a heightened risk of double-counting, ultimately slowing or arresting the delivery of major housing and employment developments.

4 ISSUE 3: RESIDENTIAL CHARGING RATES

- 4.1 The Inspector's specific query regarding whether a flat, uniform £60 psm residential rate is justified across all scales and locations identifies a fundamental evidence issue.
- 4.2 A single flat levy fails to reflect the highly fragmented market realities of Greater Cambridge's housing markets. Viability variables – including build costs, Benchmark Land Values (BLV), Gross Development Values (GDV), and Residual Land Values (RLV) – will diverge significantly between, say, Cambridge city centre, strategic urban edge extensions, and lower-value rural settlements.
- 4.3 For example, looking at residential sales values, BNP acknowledges the wide variation in residential capital values across Greater Cambridge, citing a range of £322 - £836 psf from rural to city centre (BNP Viability Report - Appendix 3).
- 4.4 We recognise that some 26 housing typologies have been tested, but we do not agree with many of the appraisal assumptions.
- 4.5 Firstly, BNP adopt benchmark land values (BLV) equating to circa £100,000 to £150,000 per acre as BLV for residential schemes, saying this reflects minimum option prices. In our experience, minimum option prices are higher. We are aware of a very significant landholding under option to the south of Cambridge where minimum option prices are £175,000 per acre.
- 4.6 Secondly, BNP assume a proxy for S106 contributions of £2,000 - £5,000 per unit. But because Greater Cambridge is explicitly retaining S106 for heavy infrastructure items like new schools, expansion of medical practices, and extensive open space/allotment requirements (and under the SPD potentially strategic infrastructure), it is questionable whether a generic proxy allowance is sufficient, especially on large greenfield strategic sites.
- 4.7 Thirdly, we note that on larger residential developments on the edge of existing settlements, BNP recognise developers typically incur additional costs for utilities upgrades, estate roads, and related infrastructure. BNP's viability model applies an allowance of £29,070 per unit to cover these costs. We are concerned that build costs and particularly infrastructure costs have increased very significantly over the last 5 years, and while £29,070 may have been sufficient 5 years ago, we suggest it is not today. We are aware of a number of large greenfield sites for over 1,000 residential units, one of which is under construction and has invested in significant amounts of infrastructure already. In these cases, the costs per unit are £45,000 and £50,000.

- 4.8 Without geographic differential zoning of the CIL rate, a uniform levy will disproportionately penalise smaller and mid-sized regeneration schemes, potentially rendering high-priority sites financially unviable.
- 4.9 In summary, whilst on the face of it a flat rate of £60 psm seems not unreasonable (for example in comparison to Oxford City), it: a) does not reflect the wide geographical differences and market values that are in play throughout Greater Cambridge, and b) has to be seen in the context of rising build costs, safety requirements, on-site and off-site infrastructure provisions, existing S106 costs such as 40% affordability, and a new generation of higher S106 obligations such as requiring a minimum of 20% BNG.
- 4.10 All development is becoming more difficult to deliver because of increasing costs. If the S106 requirement increases, the total burden including the CIL charge and other increased rates such as BNG will start to impact on the ability of development to deliver affordable housing.
- 4.11 We are aware of a 2,000 plus unit development permitted 5-10 years ago where developers, in agreement with local authorities, are having to review the delivery of infrastructure and reduce levels of affordable housing to ensure that the delivery of housing can continue.
- 4.12 We have seen the dramatic arrest of new build starts in London (and the case mentioned above is a rural area similar in value to rural Cambridge) and we would not wish to see the same effects taking hold in Greater Cambridge.
- 4.13 So long as S106 remains a requirement, we would suggest that larger strategic rural sites outside central Cambridge should have CIL levels reduced to zero to avoid delivery issues and also a reduction in levels of affordable housing being delivered.

5 ISSUE 4: STUDENT ACCOMMODATION

- 5.1 Under the CIL charging schedule, purpose-built student accommodation (PBSA) is to be charged at the same £60 psm rate as other residential uses.
- 5.2 It appears that BNP use an open market rents/yields approach to come to a rate of £60 psm for privately provided student accommodation. However, this approach is inappropriate for college-operated purpose-built student accommodation (PBSA), which is not a revenue-optimised investment product. Student accommodation provided by the colleges and other charitable bodies should have a nil-rated CIL liability.
- 5.3 This again emphasises the importance of clearly establishing that as well as Mandatory Charitable Relief (Reg 43), Discretionary Charitable (Reg 44) and Exceptional Circumstances Relief (Reg 55) are available so that CIL is not charged, enabling Caius and other colleges to maximise the provision of student accommodation either provided directly or through the College's investment properties.
- 5.4 Moreover, this is a point which Regulation 19 GCLP draft Policy H/AH recognises, when it confirms that an S106 affordable housing contribution will not be sought where the student accommodation involves the redevelopment of buildings and land owned by the University of Cambridge, Anglia Ruskin University, or a University of Cambridge

College, provided it continues to be owned by one of these institutions post-development.

- 5.5 We note Quintic in its May 2026 summary of St Johns College says: ...” *Consider applying nil rate to PBSA if the rents are discounted and secured by a planning obligation*”. On its student accommodation Caius does not charge full rents, so we would concur with Quintic’s recommendation and request that CIL of £60 psm should not be charged.
- 5.6 However, we also note where student accommodation is delivered on other non-university sites of 10 or more units, under Reg 19 GCLP Policy, A/AH privately provided student housing is subject to 40% affordability via payment in lieu. We also note this 40% requirement also applies where the University of Cambridge, Anglia Ruskin University or a University of Cambridge College land or building is being redeveloped for other forms of housing – even though proceeds could be used to fund student accommodation.
- 5.7 We may therefore be faced with the situation that where student accommodation is delivered on non-university sites in Greater Cambridge, they will be a) charged the CIL rate of £60 psm, and b) subject to a S106 requirement for 40% affordable housing via an off-site/cash in lieu payment.
- 5.8 This could risk a situation where there is not a viable market for private/developer provided student accommodation, which is needed as part of the overall student accommodation offer in Cambridge.

6 ISSUE 7: CHARGING RATE FOR OFFICES, R&D, AND “MID-TECH”

- 6.1 Caius considers the proposed rate of £175 psm for offices and R&D to be unreasonable and not supported by the evidence.
- 6.2 In contrast to the 26 typologies assessed for housing, BNP has tested two office typologies. Given the GIA/site areas used, these typologies are clearly multi-storey office buildings within the main Cambridge city area. These are not, therefore, R&D or mid-tech uses and are not representative of greenfield locations outside the central Cambridge area, where much of future employment space is planned and allocated in the Reg 19 GCLP.
- 6.3 Hence the blanket rate of £175 psm which is proposed to be applied across Greater Cambridge is not reflective of office or R&D values and build costs across most of the CIL charging area.
- 6.4 On rental values, BNP adopt a rent of £615 psm (£57.13 psf). Prime rents are at this level within central Cambridge, but they drop off quite quickly from the centre. BNP adopt BCIS build costs for office developments, but high-specification R&D costs are higher. We would also note that while they adopt median BCIS rates here, they adopted upper quartile figures in Oxford.
- 6.5 On larger residential developments on the edge of existing settlements, BNP note developers typically incur additional costs for utilities upgrades, estate roads, and other related infrastructure (factoring in an allowance amounting to £29,070 per unit to address these requirements). If this is appropriate for large residential, why is it not the same for offices/R&D and indeed other employment uses such as mid-tech and

B2/B8? This again suggests BNP has not considered development out of the city centre where infrastructure upgrades are likely to be required.

- 6.6 Office and R&D rates also seem to be “justified” in the BNP viability study by the fact that Oxford City Council (also advised by BNP) has recently adopted the same £175 psm CIL rate. It should be noted that the Oxford rate applies to the tightly defined city council area and not the wider Oxfordshire county. For example, in South Oxfordshire which surrounds the north, east, and south of the city - and would equate in geographical proximity to the southern parts of Greater Cambridge - there is no CIL requirement on office development.
- 6.7 It is also of note that while the Oxford CIL is the main source of funding for infrastructure, with no additional S106 requirement, in Cambridge the S106 sum could add a significant additional cost to development. This alone should be reason for a different rate to that adopted in Oxford City Centre.
- 6.8 In summary, the viability report adopts the prime rents from the city rather than the lower end of the range, which we understand would be normal practice for testing planning viability outcomes. It also adopts lower-level office costs which do not reflect R&D costs and don’t reflect buildings hoping to achieve prime rents. They have also not reflected the need for infrastructure upgrades in out-of-centre locations.
- 6.9 If the viability study had considered the wider range of geographical locations and employment space typologies which would come under the Office/R&D CIL category, in our view it would have been more apparent of the need for differential CIL rates depending on location and property typology – perhaps central Cambridge, outer Cambridge, and rural areas – and to split the uses into a number of classes such as Office, R&D, and mid-tech.
- 6.10 In planning terms “mid-tech” is a use which could fall in E(g), B2, and B8. In the proposed CIL charging schedule, “mid-tech” developments could therefore fall within the proposed £175 psm rate. However, in market terms, mid-tech space usually has a lower specification with much lower rents than offices/R&D. Placing mid-tech space in the same category as office/R&D is therefore to confuse development types and characteristics.
- 6.11 Rates of £175 psm for offices/R&D outside the prime city centre area would call into question development viability, and if applied to mid-tech would, in Caius’ view, be unviable and arrest/stop mid-tech development, much of which now underpins Greater Cambridge’s growth plans.
- 6.12 In this regard, Caius together with its partners IWM and Henry Boot Development is soon to apply for circa 50,000 sqm of aviation and related technology space at IWM Duxford – the greater part of which is “mid-tech” space. Henry Boot Development is appearing at the examination and will give evidence as to the impact on viability if mid-tech were subject to a rate of £175 psm.
- 6.13 We therefore ask the Inspector to address a most significant point made by Quintic in their summary of representations and actions for the Charging Schedule (May 2026) which stated: *...“If mid-tech does not fall within B2/B8 uses, then CS (Charging Schedule) should be clarified to incorporate mid-tech into £35 psm rate”*. We welcome and fully support these Quintic recommendations and trust the Inspector will also support this change to the charging schedule.

7 CONCLUSIONS

7.1 Caius respectfully asks the Inspector to consider the following points.

- a) the charging authorities make provision for **Reg 44 (discretionary relief for charitable bodies for investment purposes)** and **Reg 55 (exceptional circumstances relief)**.
- b) the charging authorities **issue a public notice of the availability of Reg 44 and Reg 55** provisions within the charging area and issue a statement of policy.
- c) that Reg 44 and Reg 55 relief will be **made available at the same date as CIL charging comes into force**.
- d) the charging authorities recognise that Caius as a **charitable institution often works with development partners**, in Caius case always maintaining its freehold ownership, to generate returns in order to invest in the educational estate, particularly in the provision of new student accommodation and maintaining discounted rents.
- e) request charging authorities to extend the final payment window in the **instalments policy** to 16 months in respect of projects with a CIL liability of over £500,000 recognising this will assist with developer cash flow, also recognising many **large sites will be multi-phased** over many years, and each individual phase will **trigger its own separate CIL liability upon its specific commencement date**.
- f) to examine further where potential **double counting** may arise with CIL and S106 (detailed in the examples above) and its likely impact on development viability within Greater Cambridge.
- g) request the charging authorities to ensure **“Mid-tech” must fall into the B2/B8 CIL rate** (a point acknowledged by Quintic).
- h) given the widely different locational and financial circumstances governing development throughout an area as large as Greater Cambridge, the charging schedule should have **different charging rates for different geographical zones**. These separate zones could for example, be divided into Cambridge City Centre, outer Cambridge, and rural areas. The viability of each development use category should be robustly tested across a range of locations within Greater Cambridge to demonstrate a CIL rate that can be realistically supported; and
- i) As long as S106 remains the preeminent requirement, we would suggest that **larger strategic rural sites outside central Cambridge should have CIL levels reduced to zero** to avoid delivery issues and also a reduction in levels of affordable housing being delivered.
- j) Support Quintic recommendation for **purpose built student accommodation (PBSA)** *Consider applying nil rate to PBSA if the rents are discounted and secured by a planning obligation”* which should also apply to non-university or College owned land where student accommodation will be have to provide 40% affordable housing in any event.