

30 January 2026

**By Email**

localplan@greatercambridgeplanning.org

Dear Sir / Madam

## **GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION**

### **COMMENTS ON BEHALF OF KING'S COLLEGE, CAMBRIDGE**

This response is submitted on behalf of King's College, Cambridge. It should be considered separately from the joint consultation submitted on behalf of the Cambridge Colleges Bursars' Planning Sub-Committee.

#### **POLICY S/C/OPM: OLD PRESS / MILL LANE - OBJECT**

King's College have agreed in principle to purchase this site from the University of Cambridge. An initial meeting has been held with Senior Officers at Greater Cambridge Shared Planning and a PPA is in the course of being set up.

The College welcomes the allocation for a student accommodation-led scheme. However, it is not clear if the site would fall within the definition of a 'university or college campus site' as set out in the Affordable Housing policy H/AH (we comment further below). It is the College's view that it should.

It is also not clear why the site area includes Little St Mary's Lane etc when the southern portion of the site has already been developed by Pembroke College and so the impact of any development on this residential street has already occurred. The College suggests the plan is amended to exclude this. It is also not clear why the site plan is different from that for Policy S/PRIA/OPML (or indeed why separate policies are needed).

As the implication of S/C/OPM is that the room capacity will be determined by the acceptability of detailed proposals, it seems unnecessary to specify 256 rooms. If a number is considered desirable, then 'around 260 rooms' would make more sense. The phrase 'for university related sites' seems unnecessary / unclear and should be deleted.

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[REDACTED] [turley.co.uk](http://turley.co.uk)

Restricting uses to those in only subsections a), b) and c) of Class E is unnecessary. Other Class E uses may be equally suitable.

As a consequence, we would suggest the following revised wording for bullet point 2:-

*Allocation to provide mixed use student accommodation (approximately 256 260 student rooms) and faculty buildings, commercial business and service in Class E (a), (b) (c) (food and drink floorspace) and other ancillary facilities. Site capacity to be subject to detailed proposals. for university related uses*

In point 1) limb b) is unnecessary as a Heritage Impact Assessment is required by Policy GP/HE and the Council's validation requirements anyway.

Our experience from other schemes is that the phrase 'active frontages' in limb c) can be taken by members of the public to mean retail units. As active frontages can also sensibly include building entrances / designs which ensure natural surveillance of the street, the expectation should be clarified by providing a definition of 'active frontages' (this would also relate to policy J/FD 2 where a similar aspiration appears).

We would also comment as follows on the **supporting information** to the policy:-

The last sentence in paragraph 3 appears incomplete and so the meaning is unclear.

Although the aspirations are understood, there is duplication with the Public Realm Improvement Area policy (see below). However, to say that redevelopment must ensure that safer streets etc are created is unacceptably onerous when works will be carried out in the public highway etc over which the College has no control. Replacing the word 'must' with 'should take reasonable opportunities' would suffice.

The landscape etc aspirations in paragraphs 5 and 6 are similarly understood but could be in conflict with the desire to retain aspects of the site's formerly industrial character which was a feature of discussions during the development of the 2018 Masterplan.

## **POLICY S/PRIA/OPML: OLD PRESS / MILL LANE - OBJECT**

The College would suggest that this policy is combined with S/C/OPM as there is both repetition and inconsistency between the two policies. Notwithstanding this:-

It is not clear why this policy requires accordance with the 2018 Masterplan, when Policy (S/C/OPM), which is more fundamentally concerned with the redevelopment of the area not just the public realm, doesn't. The first sentence of the policy should therefore be deleted.

Despite being concerned with public realm, this policy strays into more detailed design aspects which are covered in the redevelopment policy – consequently limbs a) b) and c) should be deleted from this policy.

We would also comment as follows on the **supporting information**.

It is not clear why the site plan differs from that in Policy S/C/OPM.

The third paragraph is entirely unnecessary as Design and Access Statements are a requirement of the Council's planning application validation requirements.

## **POLICY GP/ST: SKYLINE AND TALL BUILDINGS - OBJECT**

It is unfortunate that this policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it simply stated: *'developments that cause significant change to the existing skyline and / or are significantly taller....'*

As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.

## **POLICY GP/HE: HISTORIC ENVIRONMENT - OBJECT**

As there are specific policies relating to both designated and non-designated heritage assets, why is this policy needed? The requirement for a Heritage Impact Assessment could (if considered necessary given the Council's application validation requirements) be easily added into the other policies.

Notwithstanding this comment, in limb b), the meaning of 'nature' with respect to heritage assets needs to be clarified.

## **POLICY GP/HA: DESIGNATED HERITAGE ASSETS - OBJECT**

The requirement in point 2 that development proposals must 'preserve or enhance' and comply with the rest of strands a) to g) of this policy is not in line with statutory duty in Sections 16, 66 or 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (which requires 'special attention' to be paid). It is similarly not in accordance with paragraphs 213 to 215 of the NPPF where, in some circumstances, public benefits can outweigh harm to heritage significance. As drafted, this is unreasonably prescriptive.

In point 3 (a) who 'formally' assesses this (ie whose opinion determines if a building is considered unsound)? Similarly, how could an applicant ever demonstrate that 'all possible measures' have been explored in point b).

It is not clear if all of strands a), b) and c) must be met or if these are either / or situations.

## **POLICY H/AH AFFORDABLE HOUSING - OBJECT**

The policy requires any development of student bedrooms equivalent to 10 or more dwellings or 10 or more self-contained student units to make an off-site contribution equivalent to 40% bedrooms or units being affordable.

It is unclear how this aligns with policy H/SA which proactively supports the provision of student accommodation recognising that there is identified need in the city. The supporting text to policy H/SA clearly acknowledges the benefit in contributing to addressing housing need as a whole, noting that dedicated college student accommodation removes student population from the housing market.

*The text states: 'Encouraging more dedicated student accommodation can overall provide lower-cost housing that takes pressure off the private rented sector and increases the overall housing stock. The development of new student accommodation reduces demand for private accommodation occupied by full-time students and may release housing back onto the market to cater for wider housing needs.'*

The financial burden imposed by the draft policy would not encourage colleges to actively seek opportunities to provide dedicated accommodation for their students, beyond those exceptions set out in the draft policy. This would risk a situation where a proportion of students who could potentially be housed in college accommodation, are remaining in the private rental market.

As in the adopted Local Plan, draft policy H/SA requires that a formal legal agreement be entered into with at least one educational institution and to ensure the accommodation is retained for students. As such the accommodation would be occupied by a group in the community who have specific housing needs and whom the Council actively seeks to remove from the general housing market.

It is not clear at 10.a) what 'within an existing university or college campus site' means. As with a number of colleges Kings College has dispersed sites which collectively form the college. It would be unreasonable to seek an affordable housing contribution from student accommodation developments on a site currently within college ownership.

It is requested that the text be amended as follows:

10. An affordable housing contribution will not be sought where the proposed development is:

a. within an existing university or college campus site, or

b. for the redevelopment of ~~existing purpose-built student accommodation~~ a site which, at the date of the adoption of the Plan, is owned by a university or college, and which will continue to be owned by a university or college after the redevelopment to provide student accommodation to meet its needs

## **POLICY H/MO HOUSES IN MULTIPLE OCCUPATION - OBJECT**

Part a) seeks to ensure there is not an over-concentration of the HMO use in a local area.

The draft policy introduces at 1b) a restriction to prevent three or more adjacent HMOs or a C3 property being sandwiched between two HMOs.

The supporting text at paragraph 4 states that a continuous frontage of 2 or more HMOs immediately adjacent to each other is an over-concentration. Furthermore, that the definition of 'over concentration' is still to be refined.

This is clearly unresolved. It is not clear why two HMOs next to each other is considered an over-concentration when this does not account for wider context. The intention of the policy is presumably to ensure there is no adverse impact on residential amenity. It is suggested that further consideration be given to the definition and whether it is the right approach to address the matter of potential harm to residential amenity.

Point 1b) is considered unnecessary as this could be covered through 1a) allowing for site specific circumstances to be taken into account.

## **POLICY CC/DC: DESIGNING FOR A CHANGING CLIMATE - OBJECT**

King's College have concerns regarding this draft Policy. While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Some of our buildings may require large open spaces such as lecture theatres which present unique challenges to issues such as ventilation and overheating. The College therefore requests that the policy be amended to include the following text:

***Buildings which have heritage and/ or specific functional constraints will be provided additional commercial or technical flexibility with these requirements subject to the provision of evidence.***

## POLICY CC/NZ: NET ZERO CARBON NEW BUILDINGS - OBJECT

The College notes that the Government is progressing the Future Buildings and Homes Standards (FBS/FHS), which is intended to deliver highly energy-efficient, low-carbon buildings through Building Regulations at a national level. The College has both residential and non-domestic buildings and so will be impacted by both. The Standards ensure new buildings are fossil fuel free and produce significantly lower carbon emissions than current standards, supporting the transition to net zero in a consistent and coordinated manner across the country. Delivering these requirements through Building Regulations, rather than through locally specific standards, provides certainty to the development industry, avoids unnecessary variation between authorities, and supports efficient delivery at scale. As the Government is proposing to change legislation to prevent local authorities from setting standards above Building Regulations if this legislation is approved then draft policy CC/ NZ will need to be significantly amended or deleted.

There is no mention in the draft Policy of the need for flexibility where sites are impacted by heritage designations, which of course significantly impact the College. We therefore suggest that the following wording should be inserted into the draft Policy:

*It is recognised that buildings impacted by heritage designations may have specific constraints and this will be considered in the context of the targets within this Policy.*

The College considers that the space heating (15-20kWh per m<sup>2</sup>) target proposed is extremely challenging for residential development as is the Energy Use Intensity Target (EUI) of 35kWh per m<sup>2</sup> year. This is effectively implementing the Passivhaus standard which is extremely challenging both financially and technically.

King's College has a number of concerns with the application of the UK Net Zero Carbon Buildings Standard (NZCBS) as a key aspect of target setting within this policy. These are:

- 1) The NZCBS has recently finished a one-year trial period and is evaluating feedback and results. Turley Sustainability and ESG have been involved with the production of this standard and the trial of a number of buildings. We are aware of feedback that is likely to make changes to the standard and targets which would in turn impact this draft Policy. The College requests that the Council closely monitor these changes and respond accordingly.
- 2) In addition, the draft Policy appears to be asking multi-residential (eg student accommodation) to adopt the NZCBS 2030 targets at the point of plan adoption. Firstly, no targets are provided in the policy which we consider to be a significant omission. The College has checked the NZCBS and note that the energy target for 2030 is currently set at 75kWh/m<sup>2</sup> which a number of members of the pilot study consider to be too high.
- 3) The College considers that the use by the draft Policy of a specific NZCBS target year is flawed and should be revisited. One of the main aims of the NZCBS was to develop targets for every year to 2050 that would apply to a specific building type at the point of construction. This was considered necessary to recognise the fact that at present it is difficult to meet higher targets and the development industry would need time to gradually adapt.

In light of the above, King's College requests that, if the Council is committed to using the NZCBS, then the policy be updated following the completion of the pilot study and the policy is redrafted to request the targets relevant to the start of construction. As the results of the NZCBS have not been published, the College may change our representations at Regulation 19 stage following review of any new information.

In relation to Part C, the draft Policy states that “proposals must seek to maximise opportunities to generate on-site renewable energy to enable the development, where possible, to achieve all energy demands through onsite energy generation”. This policy is extremely challenging for our buildings from both a commercial and technical perspective. For example, our student accommodation buildings require significant electricity supply (particularly if they are all-electric) which means we would require substantial volumes of PV cells to meet the energy supply on site. It is considered highly unlikely that there will be sufficient roofspace to contain this PV and the proposals may impact the setting of nearby heritage assets. We assume that the phrase ‘where possible’ will be applied in decision-making but we would prefer the insertion of additional text as follows:

*Proposals should maximise the deployment of renewable energy where appropriate and viable.*

Part D of draft Policy CC/NZ introduces the concept of an “Energy offset fund” to enable developers to make payments in lieu of failure to meet the energy and carbon standards. The College is concerned that the policy does not give any detail with respect to the cost of the fund and therefore do not believe this aspect of the draft Policy is sound and in accordance with Paragraph 59 of the NPPF which requires local plan policies to be accompanied by up-to-date viability assessments.

Part D of the draft Policy also requires new development to calculate whole life carbon emissions through a nationally recognised whole life carbon assessment tool and demonstrate actions to reduce embodied carbon where possible. The College supports the need to reduce embodied carbon but believe that flexibility should be applied for example for outline planning applications where the detail with respect to material use is not often available. The College therefore requests that the following text be inserted into this draft Policy:

*The Whole Life Carbon Assessment undertaken should be proportionate to the nature and scale of the application.*

## **POLICY CC/WE: WATER EFFICIENCY IN NEW DEVELOPMENTS - OBJECT**

The College fully supports the need to improve water efficiency in new developments given the serious issue within the Greater Cambridge area with respect to water stress. We acknowledge the need to find practical and viable solutions that can go beyond current targets, but any solutions must also be reliable and acceptable to development and recognise the challenges of specific building types.

The College assumes that for student accommodation, the target of 5 credits for category Wat01 of BREEAM will be relevant (strand c) of the policy). To achieve these targets will require extensive water management and recycling facilities including potentially rainwater harvesting and greywater recycling. Both of these technologies have considerable commercial and technical implications, particularly with respect to maintenance. The Colleges therefore considers the term ‘unless demonstrated not practicable’ will be applied to decision making and all of the water efficiency targets presented.

## **POLICY CC/IW: INTEGRATED WATER MANAGEMENT, SUSTAINABLE DRAINAGE AND WATER QUALITY - OBJECT**

King’s College fully supports the need for integrated water management and strategic thinking and this has been considered within our site and new development activities.

The College does have concerns respect to the application of paragraph 6 of the policy, which states that, “To protect and enhance water quality, all development proposals must demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).” While it is reasonable to ensure that development is appropriately served by

water and wastewater infrastructure, the policy as currently drafted risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage.

The provision and timely upgrading of wastewater treatment and conveyancing infrastructure is a statutory responsibility of water companies, who are required to plan for and accommodate growth through the relevant regulatory and investment frameworks.

The College considers that Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.

## **POLICY CC/CE: SUPPORTING A CIRCULAR ECONOMY AND SUSTAINABLE RESOURCE USE - OBJECT**

King's College supports the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where "practical and viable" to meet all requirements in full.

However, the College has concerns regarding paragraph 5 of the policy, which introduces a requirement for the submission of a Circular Economy (CE) Statement. It is considered that this requirement relates to the information needed to support a planning application rather than to the policy tests against which proposals should be assessed. As such, this requirement would be more appropriately addressed through the Council's validation requirements, rather than embedded within the policy itself. The College also believes that the submission of such a statement and/ or information within a Sustainability Statement should be limited at outline planning application stage given that building design information is very limited at that stage. A CE statement should be reserved for detailed design stage only where it will be more meaningful in terms of information.

We trust that these comments are helpful and look forward to seeing the revised Plan at Regulation 19 stage.

Yours faithfully

Dr Jon Burgess  
**Planning and Heritage Director**

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