

28 January 2026 By email only localplan@greatercambridgeplanning.org	
Greater Cambridge Shared Planning Policy Team	
Dear Sir or Madam	
REPRESENTATIONS TO GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION ON BEHALF OF TRINITY COLLEGE	

This submission is made by Turley on behalf of Trinity College, Cambridge in response to the Greater Cambridge Regulation 18 Draft Local Plan.

The College is in broad support of the Plan as a whole. The following policies have been identified as of concern to the College and comments are provided as below.

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

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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 Trinity 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

It is requested that the meaning of 10a be clearly defined.

Policy BG/BG: Biodiversity and geodiversity

Object

This draft policy requires major development to provide 20% net gain on site or if not possible then as off-site credits. This is double the mandatory requirement of 10%. This increase in biodiversity net gain required for all major development is a significant additional cost which can impact viability and can compromise designs.

The Biodiversity and Green Spaces Topic Paper gives some examples of schemes where 20% net gain has been secured. These are a small proportion of the major applications determined by the Councils and it is noted that these applications date back several years.

Inevitably there will always be sites where such gains can be delivered. The site-specific circumstances can make a considerable difference to the ability to include for the creation of on-site habitats and BNG delivery.

It is noted that the viability challenge has been recognised by central government. The consultation document issued by Dept for Environment, Food & Rural Affairs in May 2025 sought views on whether the current 10% requirement was too onerous particularly for medium sized sites.

The consultation sought to consider whether the threshold for 10% should be lifted. As a result, the exemption will be lifted for sites of less than 0.2ha and the requirements simplified for small and medium sized sites.

This consultation is highlighted as it recognised evident difficulties in delivering 10% net gain let alone 20%.

It is requested that the policy requirement should remain at the mandatory threshold of 10%.

Climate Change

Policy CC/DC: Designing for a changing climate

As the results of the Net Zero Carbon Building Standard have not been published, the College may change representations at Regulation 19 stage following review of any new information.

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) is relevant. To achieve these targets will require extensive water management and recycling facilities including potentially rainwater harvesting and greywater recycling. The use of these technologies may not be possible within the constraints of the broader environment. The College therefore considers the term 'unless demonstrated not practicable' should be applied to decision making and all the water efficiency targets presented.

Policy BG/RC: River Corridors

Object

The College supports the protection and enhancement of the River Cam recognising the invaluable environmental, leisure and historical role it plays in the landscape and townscape of Greater Cambridge. However, the requirement in strand 1 a) of the policy is too broad and the College would request it is amended to:-

Development along river corridors and their tributaries must demonstrate how it:

- a. Protects and enhances important views to and from the river.

'Important views' could be identified as those within the various Conservation Area Appraisals for example.

The College considers that the introduction of Riparian Buffer Zones in part 2 of the policy. is excessive and unnecessary. Imposing a blanket restriction on development with a fixed buffer of 10m fails to take into account the considerable variation in the existing and historic development pattern along the riverbank and associated watercourses. For example, a fundamental aspect of the character of central Cambridge is the relationship of open space with historic (including College) buildings many of which sit on or very close to the riverbank. To reinstate a 10-15m buffer zone along the river Cam would significantly harm the character and appearance of many established areas, the vast majority of which are protected by Conservation Area designation. This policy would therefore be at odds with the Statutory Duty within Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (and potentially Section 66 of the same act relating to the setting of Listed Buildings) and the heritage policies within the existing and this draft local plan.

In any case, the College considers that Part 2 of the policy is unnecessary as the protection of water quality and watercourse habitats (the aims of this policy) are already covered by a range of robust policies in the draft Plan. These include:

BG/BG Biodiversity and Geodiversity which ‘requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were in before development’. Further the River Cam and its tributaries are designated as a County Wildlife Site as shown on the Policies Map. The policy states: ‘proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance (as identified on the Policies Map) will not be permitted. Exceptions will only be made where the benefits of the development significantly outweigh any adverse impacts. In such cases where development is permitted, proposals must demonstrate that the mitigation hierarchy has been implemented, and the intrinsic natural features of particular interest must be safeguarded and enhanced.’

CC/IW Integrated water management, sustainable drainage and water quality. The policy states: ‘All development proposals must adopt an integrated approach to water management which considers water efficiency, sustainable drainage, water quality, flood risk and biodiversity’.

BG/GI Green and blue infrastructure. The policy states: ‘All development must demonstrate how it protects and enhances green and blue infrastructure appropriate to the development’s scale and location.’

Policy I/CM: Construction Management. The policy requires the approval of a Demolition and Construction Environmental Management Plan. This must include proposed safeguards and controls to minimise the risk of land contamination and the pollution of groundwater and to minimise the risk of harm to trees, protected habitats and protected species that could arise during demolition and/or construction.

Parts of the River are also protected by **BG/PO Protecting Open Spaces and BG/BG Meadows and Drains**

The College is keen to continue to be involved in the preparation of the Plan and requests that Greater Cambridge give consideration to the above in preparing the next iteration of the Plan.

Yours faithfully



On behalf of Turley (Cambridge)

