

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 GIRTON COLLEGE	

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

Girton College is the only College of Cambridge University located within the administrative boundary of South Cambridgeshire District Council (SCDC). It is one of the larger Colleges of Cambridge University, with almost 800 students, over a third of whom are postgraduates, together with 120 fellows.

The College have outline planning permission with a masterplan for the development of new student accommodation, an auditorium and associated administrative, sports and social facilities within the main College site. The first phase of the masterplan for student accommodation and auditorium is currently at early design stage.

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.

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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 Girton 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 H/MO Houses in Multiple Occupation

Object

Part a seeks to ensure there is not an over concentration of 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. Further that the definition of ‘over concentration’ is still to be refined.

This would appear unresolved. It is not clear why two HMOs next to each other is considered an over-concentration when this does not take into account wider context. The intention of the policy is presumably to ensure there is no adverse impact on residential amenity.

It is requested that further consideration be given to the definition of over concentration.

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 for Girton College – 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 is not clear.

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 strands a), b) and c) must be met or if these are either / or situations.

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%.

Policy CC/DC: Designing for a changing climate –

Object

Giron 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 a hall 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 m²) target proposed is extremely challenging for residential development as is the Energy Use Intensity Target (EUI) of 35kWh per m² year. This is effectively implementing the Passivhaus standard which is extremely challenging both financially and technically.

Girton 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 Greater Cambridge 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/m² 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, Girton 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 be relevant to the start of construction. As the results of the NZCBS have not been published, the College may change representations at Regulation 19 stage following review of any new information.

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) 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 has considerable commercial and technical implications, particularly with respect to maintenance. The College

therefore considers the term ‘**unless demonstrated not practicable**’ should 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

Girton 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 with 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

Girton College broadly 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.

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)

A black rectangular redaction box covering the signature of the representative.