

30 January 2026

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Planning Policy  
Greater Cambridge Shared Planning

Dear Sir/Madam

## **GREATER CAMBRIDGE SHARED PLANNING DRAFT GREATER CAMBRIDGE LOCAL PLAN (REGULATION 18) CONSULTATION (2025)**

This representation has been prepared by Turley on behalf of The Bell Educational Trust Limited ('the Trust') in response to the Greater Cambridge Local Plan Regulation 18 Consultation. The representation principally relates to their land interest at Red Cross Lane/Babraham Road, Cambridge (the 'Site').

### **Background**

The Bell Educational Trust, an educational charity, owns the site at Red Cross Lane and to date wholly owned Bell Educational Services ('Bell'), its trading subsidiary. Bell was an English language school for international students and had been established for over 70 years in Cambridge.

However, last year, due to unforeseen circumstances, Bell went into administration and is no longer trading. The Site is currently being marketed for occupational lease, long leasehold or freehold in accordance with Charity Commission rules. The Bell Educational Trust has previously made representations to the Greater Cambridge Local Plan Regulation 18: Issues and Options Consultation 2020 where comments focused on jobs, homes and biodiversity and green spaces.

Under this current consultation, part of the Bell School Site is proposed to be allocated for student accommodation in relation to the Bell Educational Trust. This letter provides further information with particular comment on the inclusion of the site as an allocation within the Local Plan.

### **S/EOC/BS: Bell School, Babraham Road**

The Bell Educational Trust is broadly supportive of the allocation of the Site at Babraham Road for residential uses. To date, the Site has been part of a wider allocation for residential development and student accommodation. The residential element (known as Ninewells) has now been built out, and this parcel of land remains undeveloped.

8 Quay Court  
Colliers Lane  
Stow-cum-Quay  
Cambridge  
CB25 9AU

T 01223 810 990 [turley.co.uk](http://turley.co.uk)

The proposed allocation is for this remaining part of the Site which benefits from an extant planning permission for student accommodation (secured under planning permission 12/1027/S73 and 13/1786/REM). The draft policy currently proposes the site for 100 student bedrooms and specifically refers to the student bedrooms contributing to the *needs of The Bell Educational Trust Limited's adjacent educational site*. As such the site can only accommodate students associated with the Bell Educational Trust which historically meant the Bell School. Up until last year, this had been the intention of the Trust, but as has been explained it is no longer an option.

The National Planning Policy Framework (NPPF) in paragraph 127 makes it clear that planning policies need to reflect changes in the demand for land. In circumstances where allocated land has not been brought forward for approved uses, the NPPF advises that *'it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs'*.

Further, while the 'Supporting information' which accompanies the policy acknowledges that the operator of the site, although currently The Bell Educational Trust, could change in the future, however this is not carried through into the actual wording of the policy itself.

Given the current position with the cessation of trading for Bell, the future owner, operator, use and activities are unknown. Moreover, the requirements for student accommodation if any are unknown. Given this, the policy as currently worded would hinder the site being developed for other appropriate uses whether this be for student accommodation, other residential uses or even healthcare uses and would be contrary to guidance set out in the NPPF.

The Bell Educational Trust asks the Council to consider amending this requirement to allow for greater flexibility regarding future occupiers and uses for the Site.

Given the requirements set out in draft Policy S/JH relating to the need to provide a minimum of 48,195 new homes alongside 2,042 additional units to meet the accommodation needs of students over the period 2024-2033, it is considered that this flexibility would assist with addressing these identified needs.

The site could deliver much needed student accommodation for other institutions in Cambridge in line with the requirements of policy H/SA: Student Accommodation. For example, Addenbrookes Hospital, which is in close proximity generates significant demand for student accommodation.

Equally the site is eminently suitable for other uses given the housing immediately adjacent to the site at Ninewells and the adjacent Addenbrookes Hospital. This is a highly sustainable site which is ideally suited for a range of uses. An overly restrictive policy would prevent the development of a deliverable site within the City which could also make a valuable contribution to the NPPF requirement for 10% of the overall housing requirement needing to come from sites under 1 hectare.

The Bell Educational Trust asks the Council to remove the limitations placed on the Site through the allocation specifically referring to student accommodation for the Bell Educational Trust and instead allow for either student accommodation, housing or indeed a mixed-use development. The NPPF at paragraph 71 supports the development of mixed tenure sites.

The extant permission provided access to the Site from both the residential development as well as through the school grounds and therefore should the Site be proposed to operate independently from the School, then access can be achieved.

It is therefore suggested that the wording of the policy be amended as follows:

- Site area of 0.38 hectares

- Capacity for approximately 100 student bedrooms or other residential uses or healthcare related uses in the alternative
1. Development proposals must demonstrate how they will meet the following requirements:
    - a. With regard to new student bedrooms the need to contribute towards meeting the needs of The Bell Educational Trust Limited's the adjacent educational site or other existing educational institutions in line with Policy H/SA: Student accommodation whilst being carefully integrated; or
    - b. Residential development and/or healthcare uses which sensitively respond in height, mass, density and landscaping to its immediate residential contextDevelopment will be carefully integrated with the adjacent residential and educational uses.

## Summary

The Bell Educational Trust is broadly supportive of the allocation of the Site through S/EOC/BS: Bell School, Babraham Road for student residential uses. However, they consider that the Council should review the requirements set out in the policy with a view to amending as suggested, because not doing so may result in the site not being used at all given the administration of the Bell school. Thereby conflicting with the guidance in the NPPF regarding the need for a flexible approach to allocated sites.

As part of their assessment of the site and indeed being mindful of the extant planning permission attached to the site, the Council have not identified any constraints. The site would provide appropriate accommodation for students, residential development or some form of healthcare provision, within a highly sustainable location. Given the shortage of such sites within the City itself, it is considered that this approach would be entirely appropriate and accord with the provisions set out in the NPPF.

We trust that these representations are in order but please do not hesitate to contact us should you require anything further. The Bell Educational Trust would be pleased to discuss their representation with the Council in greater detail.

Yours sincerely



Rebecca Flood  
**Senior Planner**

