Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.
Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.
Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.
By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.
Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Alison Stanley	
Organisation (where relevant)	Gonville & Caius College, University of Cambridge	
Job Title (where relevant)	Endowment Property Manager	
Address, including Post Code	Trinity St, Cambridge CB2 1TA	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/AH: Affordable housing
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	Yes

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Gonville & Caius College, University of Cambridge ("Caius") recognises that Cambridge and South Cambridgeshire are areas of high affordability pressure and there is an need for affordable housing in Greater Cambridge.

Policy H/AH requires all self-contained dwellings to provide at least 40% of the new homes on site as affordable housing, with co-living developments a financial contribution for off-site provision is to be provided. This requirement applies to all residential developments of the equivalent of 10 or more dwellings.

NPPF (2024) (para 59) makes it clear it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage and these should reflect the recommended approach in national planning practice guidance.

In this context we note that the councils have progressed a Community Infrastructure Levy (CIL) Charging Schedule shortly to go to Examination. The approach proposed in Greater Cambridge appears significantly different from many other situations, as the councils have confirmed that CIL will be used solely to fund strategic transport infrastructure with affordable housing, all other infrastructure, education, open space, community facilities, utilities, biodiversity and site-specific works, continuing to be secured through Section 106. However, this seems at odds with the recently adopted (April 2026) 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. SPD Para 10.21 gives further details of "strategic transport interventions".

Prima facie it would appear Section 106 costs will not reduce following the introduction of CIL, rather CIL will operate as an additional charge on top of existing obligations.

Whilst qualifying affordable housing is eligible for 100% relief from CIL, it is concerning for the delivery of affordable housing as with other S106 charges (e.g. a minimum requirement for 20% BNG – which we comment on separately) it is likley to give rise to more development viability assessment testing by applicants (NPPF Para 59) potentially resulting in reduced levels of provision or developments not progressing.

Caius support Policy H/AH where it states an affordable housing contribution will not be sought where the proposed development of student accommodation is for the redevelopment of buildings and land owned by the University of Cambridge, Anglia Ruskin University or a University of Cambridge College, and which will continue to be owned by one of these institutions after the redevelopment.

However, where student accommodation is delivered privately on other non-university sites of 10 or more units this is still to provide 40% affordable units.

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.

This could risk a situation where a proportion of students who could potentially be housed in college accommodation, are remaining in the private rental market.

Please provide a 100 word summary of your representation.

Gonville & Caius College acknowledges the high pressure on affordable housing within Greater Cambridge and agrees with the “headline” requirement for 40% affordability for new housing schemes of 10 units or more.

However, the College is concerned that this along with other S106 obligations – e.g. a minimum of 20% BNG, this could trigger more viability assessments, potentially reducing affordable housing delivery.

Caius supports the affordable housing exemptions for 40% or university-owned student accommodation redevelopments. However the College notes that strict policy requirements on other sites risk forcing students into the private rental market.

Section 4: Supporting Documents
If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

NONE

Section 5: Proposed Modifications
Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.
You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s),

as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	YES

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Caius is a significant landowner thought Greater Cambridge. Its core educational estate is complimented by extensive agricultural, residential, and commercial land and property much of which has development potential. Caius wishes to directly express its views to the Inspector.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	YES
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	YES
Informed of adoption of the Local Plan	YES