

26 September 2025

By email

Dominic Bush

Senior Planning Officer

Greater Cambridge Shared Planning Services

Dear Dominic

C/25/02161/FUL AND C/25/02162/LBC: CHRIST'S COLLEGE, CAMBRIDGE

I am writing on behalf of the applicant Christ's College to provide our thoughts on the consultations received on the above applications in anticipation that they will be considered by Planning Committee at the end of October. Our comments also reflect the issues raised at the Development Control Forum (DCF) on 11 September.

Before focussing on the detailed comments, it is worth saying, and I think worth reiterating to the City Council Members, that the fact that there are no statutory consultees objecting to the proposals is due to the almost year-long consultation with Council Officers (through a Planning Performance Agreement) together with the involvement of Historic England and the Highway Authority and presentation to the Design Review Panel. The College has responded positively to all the comments and requests for modifications or additional information throughout this process, including making changes post-submission.

I will now consider what we see as the key issues which have been raised.

Anglian Water

1. We submitted a statement from Smith and Wallwork on 8 September 2025 responding to Anglian Water's amended comments following the announcements regarding the funding of the proposed new Waste Water Treatment plant. We note that the latest comments from AW (dated 12/9/25) confirm that they now have no objection.

Other Statutory and Local Authority Consultees

2. The following consultees are content with the proposals, though some have suggested conditions as is normal for an application of this type:-

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

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

- Cambridge City Airport
- Lead Local Flood Authority
- Waste – Shared Services
- Natural England
- Cadent Gas
- Police – Designing out Crime
- Highway Authority
- Conservation, Urban Design, Landscape, Ecology, Trees, Sustainability and Environmental Health Officers.
- Historic England
- The Victorian Society

Comments from Third Parties

3. There have been a number of comments from third parties, both in support and objection to the proposals. I will concentrate on the main issues raised by the latter.

Scale and Character

4. Some of those objecting to the scheme have suggested that the proposed building is out of scale with its neighbours and in the wider City Centre context. We fundamentally disagree with this. This part of the city centre has a number of taller buildings – including the building which replaced the original Bradwells Court in 2004.
5. Right from the outset of the design journey, and the pre-application engagement with Officers and HE, the architects and design team have referenced just how this building has been designed with the Cambridge context firmly in mind.
6. The Cambridge streets which contain College buildings very rarely throw themselves open to public view¹. St Catharine's on King's Parade (though not on Queens' Lane) is the notable exception. Views are often limited to tantalising glimpses through the gatehouses. This is an essential part of the character of Cambridge. It is not to say that the streets lined by College buildings are unattractive though, it is the contrast, the rhythm of features and details which provide such strong townscape character.
7. The architects consequently looked across the city centre for comparable streets and how the chimneys break down (usually longer and more repetitive) elevations of College buildings and at the more local context to ensure that enhanced views into Bath Court and 'glimpse' views into the new building can be achieved. Consequently, the character of Christ's Lane will be enhanced and its townscape qualities improved.

¹ See for example 2.6.9 in the Council's Historic Core Appraisal (2016)

8. There is always a danger in focussing on one view of a development where features such as chimneys can coalesce into a single mass. However, streets such as Christ's Lane are viewed obliquely and as one moves along the street the experience of height is dynamic and changing.
9. Nevertheless, as you know, we have reduced the height of the chimneys by 0.90m and tellingly none of the consultees with specific design expertise have considered the scale to be inappropriate (including the Design Review Panel).
10. A feature of several objections, and something discussed at DCF, was why the present scheme does not have a basement when the approved scheme did. The inference being that the present scheme could be lower if a basement was included. A great deal of thought has been given about this – through the entire period from consideration of the new brief right up to after DCF. The world is a different place since the previous scheme was first designed in 2011 and a basement in this location brings about new challenges and issues. These can be summarised as follows:-
 - Although technically possible and previously approved, a new basement beneath Bath Court would remove all the below ground archaeology.
 - There would be undoubted structural challenges to ensure that the fabric of relatively lightly founded Grade I listed buildings was not damaged. Any enhanced foundations would likely have further archaeological implications.
 - In terms of environmental sustainability, creating a large concrete-walled basement would result in a significant increase in the carbon footprint of the building, at odds with the College, University and City's expressed aims.
 - Linked to the above the increased 'muck-away' from site would make the building's carbon take even heavier and result in greater disturbance to neighbours.
 - Creating study / recreational / work spaces below ground level is sub-optimal and not compatible with the brief's aim of improving user (students and Librarians) welfare and comfort.
11. The suggestion has been made that the proposal is not compliant with Policy 60 of the Cambridge Local Plan (2018) which relates to 'tall buildings'. At no point during many months of pre-application discussions has any suggestion been made that detailed assessment against this policy should be made. We would disagree that what is proposed 'breaks the skyline' in any sensible interpretation of the phrase and it is not significantly taller (or indeed any taller) than surrounding built form. Notably, the supporting text to the policy in paragraph 7.17 talks of 'background' buildings in the historic core being of three to five storeys with taller modern buildings, as this would be.
12. Nevertheless, in terms of the various assessment criteria in the policy:-
 - a) proportionate assessment of the visual impact of the development has been provided.
 - b) both a proportionate Townscape and Visual Impact Assessment and a detailed Heritage Statement have been provided.
 - c) drawings, sections and models have been produced (the latter a specific request from officers in the early pre-application meetings) to allow full understanding of the scale and massing.

d) the proposal does not change the orientation of buildings and will not lead to overlooking, be overbearing or adversely impact sunlight and daylight (see below).

e) the Design and Access statement considers the impact on both Christ's Lane and (internally) Bath Court to ensure that the building functions well at the human scale (particularly bearing in mind how the present building presents to both the lane and court).

13. Consequently, even if this policy was considered to apply, the proposals would be in accordance with it.
14. It is also worth reiterating that the new building occupies less than half (probably closer to a third) of the length of the lane, further undermining the claims that there will be a major change in scale resulting from the new library.

Townscape Visual Impact Analysis (TVIA)

15. Some objectors have suggested that the TVIA submitted is inaccurate, uses inaccurate methodology, visualisations and verified views. This is not the case.
16. The modelling of the proposed building shown in the TVIA has been consistently used throughout the pre-application meetings with officers, Historic England and Design Review Panel. This is based on VuCity, which is an accepted, objective, method of modelling the impact of new buildings in built up areas. Despite the 'lollipop trees', it is a model used in numerous historic cities throughout the country. No consultee has requested a different modelling method be used in the TVIA work over the past year of discussions, or since the application was submitted.
17. One of the submissions made, by a company which seemingly produces Landscape as opposed to Townscape Visual Impact Assessments, has made some detailed comments, several of which relate to differences of professional judgement. We would reiterate that Caroe Architects Ltd, who produced this work, have considerable expertise in historic buildings work and the production of TVIAs, and neither officers, Historic England or the various architects and urban designers on the Design Review Panel have disagreed with their assessments.
18. Issues such as viewpoint locations, were agreed with officers and are entirely appropriate given the location and scale of the building. As noted in the DAS, the verified views provided are extremely accurate. The locations were agreed with officers and are the places from where the impact of the proposals is best seen.
19. Caroe have recognised that some text was missing to accompany table 8.3. This is purely explanatory and does not change any of the judgements. However, for completeness, this accompanies this letter.
20. It is worth reiterating that the Urban Design Officer did ask for physical models of the building during the pre-application discussions. These were provided and have been accessible throughout the numerous discussions. These add even further to the level of accurate information about the form of the building and its scale.

Daylight and Sunlight Assessment

21. When this application was submitted, the design team used its professional judgement, in agreement with officers, in deciding that no Daylight / Sunlight Assessment was required. The reasons for this were explained in both the DAS and Planning Statements which were submitted. The key ones being that the

taller Bradwell's Court development sits to the south of the site and the location of its residential units and the way they are configured means that we could not see how there would be any negative impact.

22. As comments began to come in from local residents, we undertook and submitted a Daylight / Sunlight Assessment by Rights of Light Consultants. This confirmed what we thought that there is no adverse impact on the apartments in Bradwell's Court.
23. Despite this, there is also a suggestion that the new building will impact daylight and sunlight to Christ's Lane. The architects used their shadowing software (again in conjunction with the VuCity massing model) to see if this could be the case and this was included within the DAS.
24. Clearly this has not convinced some objectors. Consequently, we asked Rights of Light to consider this. They comment that it is not standard practice to assess sunlight levels in streets. This is our experience too and numerous historic streets in Cambridge (and throughout the world) would be destroyed if they had to be adapted to have sunlight flooding into them.
25. As was noted at the DCF, in a warming climate, there is often benefit in spaces which are able to offer shade. Indeed, the conditions that the new library create are not dissimilar to those along Petty Cury where buildings of similar height as the new library line both sides of the street with a similar orientation as Christ's Lane. This remains a vibrant pedestrian thoroughfare of similar width to Christ Lane (8 metres – but with an additional covered walkway along the south side).
26. Nevertheless, Rights of Light have confirmed that the proposed building will have no effect on the sunlight received by Christ's Lane.
27. There has also been a suggestion that the proposed building will adversely impact commercial properties along the lane. Currently, these units face north and look at the largely blank wall of the College. That was how they were built. The deep end units are dual-aspect and have faces to St Andrews Street and Christ's Pieces respectively and in any case, the site only extends along around half of the west end of the lane. Nonetheless, we asked Rights of Light for their views. They commented:-

The BRE Guidelines for neighbouring properties are applicable to habitable rooms in domestic properties. Daylight and sunlight to commercial and retail buildings is not usually considered by local planning authorities. Although the BRE guide states in section 2.2.2 that for existing buildings, the guidelines may also be applied to non-domestic buildings where there is a reasonable expectation of daylight, it is widely accepted amongst consultants and local authorities that retail premises do not fall into this category. The reduction in VSC to the commercial properties in our assessment is therefore not a material planning consideration.

28. A suggestion was also made that the model used was inaccurate. The consultants have made some slight changes in relation to windows 39 and 46 (both first floor windows). In any case, this does not change their assessment that:-

...the updated assessment and report continues to demonstrate that the development design will have a low impact on the light receivable by the neighbouring properties and we are of the opinion that that the proposed development has an acceptable impact on the daylight and sunlight amenity of the neighbouring properties.

29. For completeness, we attach the amended report from Rights of Light, even though there is no change to their assessment and they have confirmed that the impact on commercial properties, such as it is, is not a material planning matter.

Other Impacts on Christ's Lane

30. Some of those objecting consider that the proposals should have an active frontage and permeability. Despite the DCF we are not entirely clear what is meant by the latter, but creating a further direct access to the College, or inserting shops in this location would not be appropriate and would adversely impact the various heritage designations. Some consideration was given to this in the build up to the previously approved scheme, but ground floor shops were considered unfeasible. To meet the brief, it would have meant adding another storey to the building and there were clear potential impacts of noise and security to the College. It is also difficult to see how they could comfortably serviced other than directly from Christ's Lane.
31. Christ's Lane will never be (and never has been) a wide boulevard and indeed one of the great delights of Cambridge is the transition from wider streets and open spaces to more narrow, intimate and indeed shady lanes. This is precisely the function which Christ's Lane will continue to have – linking the bustle of St Andrew's Street to the green open space of Christ's Pieces. The proposed development will improve the experience though, as the present utilitarian façade will be replaced by one of texture and quality and punctuated by diffused light from the windows and the rhythm of the chimneys.
32. Our opinion is shared by the professional design advisers which the Council appoint to provide such advice (the Urban Design Officer and Design Review Panel) who feel that the new frontage will be more active and appropriately designed to be more attractive and of greater interest to those using Christ's Lane. The Officer's and DCF comments are not just accepting of the design, but effusive in their praise.
33. This is a fair judgment, considering:-
 - the form and appearance of the present library wall. At the DCF, there was acceptance that the existing elevation is a product of when the lane was a private service route and that, other than the fact that some like its relative lack of height, is generally a negative² feature;
 - the relatively plain façade of the approved 2011/2016 scheme;
 - the insertion of new windows which will allow glimpse views into the library and allow diffused light to reach street level in the evenings enhancing the perception of natural surveillance;
 - the articulation of the façade and quality of brickwork which will be laid in Flemish or other traditional brick bond;
 - the works nearest to the Bodley gable end. Here the new building is pulled further away from the Victorian library and so there is a clearer view into Bath Court and the unusual palm tree (which also means a greater sense of openness at this end of the lane).
 - The built in plinth level seat.
34. These latter features that will add character, interest and human scale to the laneway enhancing the quality of the public realm.
35. It is clear from the DCF discussion however, that there is a desire for the College 'to give more back' to the city and we will therefore explore in detail what this could involve. It should be noted that the College is

² It is not shown as such in the Historic Core Appraisal (2017) which just covers all the College buildings as a listed building. Interestingly, there is no street analysis of Christ's Lane in that document.

one of the few in the city which is generally open to the public, free of charge. I will say more about this later in this letter.

36. As I mentioned at the DCF, Christ's together with Jesus College are the freeholders of Bradwells Court and Christ's Lane. Part of the lane is public highway (about a 2m strip nearest to the College is not). The whole (ie the buildings and lane) are leased to a private company. Any leases of commercial and residential units and activities in the street such as pavement seating are therefore controlled by them. Certain activities have to be approved by the College(s) but Christ's have been happy to consent to the Starbucks seating area, commercial 'pop-ups' and the art benches for example.
37. The College would certainly be open to further activity in the street or such things as planters– though of course this would have to be with the agreement of the head leaseholder (and Jesus College). Care would be needed over any planning condition wording to avoid it being a 'Grampian' condition that could not be delivered.
38. However, it is anticipated that through the current leaseholder arrangements, the College will be liable for reinstatement of any damaged lane surfaces on completion of the development. A condition which encourages working with the head leaseholder, Jesus College and the City and County Councils to develop a strategy for enhancing activity in and beauty of the lane, would be happily considered by Christ's College.
39. Similarly, the College are already intending that the present solid gate close to the Bodley gable be replaced by an open metalwork gate, further increasing views of Bath Court, including the Bodley bay window, and adding interest for users of the Lane. The College would be willing for this gate to be an artistic installation and this could be secured by condition.

Heritage Issues

40. As you know from my email of 27 August, the heights of the chimneys were reduced and the kitchen wash-up area modified to meet the concerns raised by Historic England and the Conservation Officer. Historic England are in favour of these changes and have reconfirmed that they have no objections to the proposals.
41. We note the comments raised by the Victorian Society (letter of 22 August 2025). They do not object to the proposals but issue 'cautions' about the scale in relation to the Bodley Library and the detailing to reduce the massing. In relation to the first point, the Society acknowledge the benefit of not providing the basement. They have not though commented about the glazed atrium proposed in the earlier approved schemes which would have physically attached to the Victorian library and First Court in general. We would suggest that what is now proposed, which does not physically impact any historic fabric is to be preferred. I have commented on the building detailing above.
42. The Petitioners against the scheme at the DCF sought to suggest that we had not assessed the impact of the proposals on heritage assets nor given this appropriate weight against the public benefits of the scheme (as required by Section 215 of the National Planning Policy Framework – the NPPF). I can only think that they had read neither the Heritage Statement nor Planning Statement submitted with the applications and, so, on the contrary, have not given full consideration to the application proposals and supporting information before raising their unsubstantiated objections. However, this gives us the chance to restate these here for clarity and reflect on the changes made post-submission.
43. It is notable that the objectors focus on alleged harm to the setting of the Bodley Library (praying in aid of HE and the Victorian Society's 'caution'). On a scheme such as this where numerous heritage assets have the potential to be impacted in various ways, the overall heritage impacts need to be considered and only

then can the ‘paragraph 215’ balance be applied. That is why HE and the Vic Soc ultimately do not object to the scheme – a point glossed over by the objectors.

44. Section 5 of the Heritage Statement goes through, in some detail, the various aspects of the proposed development and the impact on Heritage Significance. This is summarised in Section 6 and then taken into Section 8 of the Planning Statement. I do not intend to repeat this here, other than to consider the impact of the post-submission revisions and be clear on what we consider the resulting level of harm to designated heritage assets to be.
45. Section 8.17 of the Planning Statement lists the elements considered to cause some level of heritage harm. These all relate to the same heritage asset (the Grade I listed main College ranges which includes the Second Court buildings).
46. The first of this list relates to the proposed creation of the wash up area in the old buttery. We have now revised the originally submitted plans meaning it is no longer intended to carry out these works. This therefore ‘falls away’ as a harmful element.
47. In 8.18 we recognise the opinion of the Conservation Officer regarding the visibility of the new flues from First Court. The reduction of height means that these are now barely visible and so the (unspecified) level of harm he was proscribing must be reduced. It is not relevant to our assessment as we considered the impact neutral anyway.
48. Also in 8.18, we list the elements which we consider to be beneficial. Again, these all relate to the College’s Grade I listed buildings. These remain unaltered.
49. In 8.19, we summarise the cumulative heritage impact on the Grade I listed buildings, through physical works and works in their setting. The conclusion is a ‘minor beneficial impact’. The post-submission amendments are all positive changes which reduce previous aspects of alleged ‘harm’.
50. Despite the reduction in the height of the chimneys, our assessment of impact on the Conservation Area remains the same (para 8.20). Again, we consider the impact to be minor beneficial, given the quality of the new building which replaces something seemingly agreed by all to be negative (and which of course benefits from the previous consent for demolition and replacement). The Conservation Officer agrees in his comments of 18/9/25 commenting that *‘it is considered the proposed elevation to Christ’s Lane represents an enhancement to the conservation area due to the improved quality of the proposed design and materials as well as the new view into Bath Court’*.
51. We consider the impact on the College’s Historic Park and Garden to be negligible and identify no impact on the setting of any other listed buildings outside the College.
52. From their letters, Historic England and the Victorian Society seemingly consider that the harm to the setting of the Bodley Library is greater than we do. It is not necessary to analyse why our opinions differ because ultimately, in not objecting, they must conclude that overall the harms and benefits in heritage terms are at least balanced, or the benefits outweigh the harms. That is certainly the conclusion of the Conservation Officer who makes this clear in his comments of 18/9/25.
53. Turning back to the statutory tests in Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 we conclude (as must other heritage consultees) that these have been met.
54. In terms of the NPPF, the Conservation Officer identifies a low level of less than substantial harm to the ‘setting and significance of the listed building’. He therefore considers that paragraph 215 is engaged.

However, he confirms that *‘the harm has been clearly and convincingly justified as required by paragraph 213. The proposal includes public benefits in the form of heritage benefits and the works overall would help to secure the building’s optimum viable use’.*

55. It is not entirely clear from this if he feels that the cumulative heritage impact is positive or neutral. Importantly though, he clearly does not consider it harmful.
56. Our assessment of heritage impact is done slightly differently as we assess whether the works would be beneficial or harmful to each asset and we arrive at the conclusion that overall the works are beneficial.
57. As paragraph 212 brings forward the statutory tests and requires ‘great weight’ to be given to the conservation of heritage assets, then this ‘great weight’ is in support of the development adds to the public benefits we outline below.

Public Benefits

58. Despite doing this in Section 8 of the submitted Planning Statement, there was a suggestion in the DCF that we had not identified these. We will therefore revisit them here, with an eye on the comments made at the DCF.
59. Much of the discussion about accessibility and permeability seems to have conveniently ignored the fact that Christ’s College is one of the few central historic Colleges which allows access to the public, free of charge, every day (except for Christmas / New Year and during the exam period). This is far more of a benefit than providing an open gate or windows in the Christ’s Lane elevation as it gives access to everyone, to the tranquillity of the College spaces, each and every day.
60. It is also worth reiterating that the College already hosts two public exhibitions each year, open approximately 4-5 months each in the Library/Archives Exhibition Room. This is within the most historic part of the College and the interior of the historic Bodley Library will be visible through recently installed glass doors from the Exhibition Room.
61. In addition, the public can consult the archives for study purpose by arrangement with the College Archivist.
62. We accept that these benefits already exist and do not, strictly speaking, stand to be weighed in the planning judgement on these proposals. However, the scheme itself delivers some very clear benefits. We already set these out in the Planning Statement and gave them a weighting (repeated below). However, it seems helpful to re-state these here.

Sustainability enhancements: (moderate weight)

- A key aim of this proposal is to reduce the College’s carbon footprint. Full details of the proposal are set out in the Sustainability Statement by Skelly and Couch which accompanied the application. The Council’s Sustainability Officer welcomes the proposals.
- Intrinsic to the proposals is removing gas from heating and hot water for the Library and in the College Kitchens, advancing the College’s journey to net zero carbon emissions.
- In addition to the highly sustainable heating and fabric enhancements proposed, the scheme will include water-saving measures and reduce the discharges to the Waste Water Treatment Plant.

Economic benefits: (moderate weight)

- The value of the University and its Colleges is fully recognised by central government in terms of its contribution to the eastern region and consequently the national economy. Enhancing the College's study spaces directly benefits this.
- Enhancing provision of education and research at the College will benefit 770 students annually for the lifetime of the buildings with direct societal and economic benefits.
- There will be immediate benefits to the wider economy and during construction.

Accessibility (moderate weight)

- The new works will mean full access to all students to the new library / study and welfare spaces,
- Major historic rooms and spaces in the College, including Archives Study Room, Library/Archives Exhibition Room, and historic Bodley Library, via the lift in the new Library, and the Old Combination Room and Upper Hall via the lift in Bath Court will all become fully accessible for the first time, ever.
- The general public will have access to the much-enhanced Bath Court and the Buttery during visitor opening hours.
- The College will also commit to host an exhibition in the New Library Lounge (Ground Floor) and guided tours of the new library, Bodley Library and Darwin's Room one day per year as part of Open Cambridge.

Design Quality and Streetscene improvements (moderate)

- As we have included the enhancement to the character and appearance of the conservation area (accepted by the Conservation Officer) through the replacement of the existing poor-quality building, we are consciously not double-counting this here.
- Larger windows allowing glimpse views into the new library and diffused lighting to the street at night time;
- Improved natural surveillance and perception of surveillance for those walking along the lane;
- Greater openness at east end of Christ's Lane with replacement of the solid gate between the Bodley and the new Library with a finely designed wrought iron gate, providing insight into Bath Court and the Bodley Library bay window to the public walking along Christ's Lane.
- New bench and, subject to further consideration and discussion, possible provision of 'book-stop' book exchange to link the library use to the public street.
- Willingness to work with the head leaseholder and the Councils to produce a post-construction plan for enhancing the vitality of the lane (by condition).
- Greening opportunities (to be secured through landscaping condition)

Ecology (minor)

- As there is no statutory requirement to show any biodiversity net gain, the intention to improve the ecological benefit through enhanced landscaping is considered to be a minor benefit only.

Conclusions

63. This scheme is a thoroughly considered well-designed proposal by a Stirling-prize winning architectural practice.
64. It is the product of a year of constructive dialogue with the Council and Historic England.
65. It will replace a poor-quality building with one whose inspiration is clearly rooted in the forms found elsewhere in central Cambridge and is entirely appropriate to its context.
66. There are no statutory objections to scheme.
67. Any 'heritage' harm suggested to the Bodley Library is outweighed by other heritage benefits and in the round the proposals will have a positive impact on the setting of listed buildings and character of the conservation area.
68. The scheme produces a number of public benefits. These will not just benefit the students of the College, but also the wider public through the enhanced character of Christ's Lane and the continued access to the College (including the enhanced Bath Court) for everyone.
69. The College have not ignored the views of the public but we do consider their objections to be overstated, at odds with the expert opinion of consultees and in some cases not material planning issues. Nonetheless, the College is happy to continue the dialogue regarding the details of the scheme and how the vibrancy of Christ's Lane might be enhanced through planning conditions.

Yours sincerely

Dr Jon Burgess
Planning and Heritage Director

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