

27 August 2026

[REDACTED]
Senior Planning Officer
Greater Cambridge Shared Planning Services

Dear [REDACTED]
APPLICATION 26/02109/FUL
CHRIST'S COLLEGE LIBRARY

I refer to our email exchange on 25 August and extension of time request the same day relating to the Christ's College Library project. As requested, I am writing with our comments on the impact of the August 2026 revisions to the National Planning Policy Framework (NPPF) on the acceptability of the proposed scheme.

Despite the structural changes to the new NPPF, and its more pro-development tone, for the most part the majority of changes do not significantly affect the determination of this proposal and how one assesses works to heritage assets. However, there are some detailed areas worthy of note.

Firstly, Policy HE4 'securing the conservation of heritage assets' in strand 1.a states that development should:

Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness.

Every aspect of this paragraph chimes with what the proposed development is seeking to achieve. In light of the discussion about 'optimum viable use', the wording here is very clear that successful conservation maintains appropriate uses for historic buildings. It is not just about finding new uses for empty ones.

Policy HE5 emphasises the need to properly assess the effect of a proposal on the significance of heritage assets affected. As we have previously described, setting is not a heritage asset in itself. It only has value in what it contributes to an asset's heritage significance. HE5.3 is important here. It is the effect on an asset's significance which matters, not the scale of a development involved.

We maintain that we have fully and proportionately described the significance of all assets potentially impacted by this scheme, showing those aspects which have a positive effect (HE5 2a); have no effect (HE5 2b), or cause 'harm' (HE5 2c). No one appears to be suggesting that the proposal would cause the total loss of significance to a heritage asset here (HE52d). Whilst the phrasing may have subtly changed – and the phrase 'less than substantial harm' –

Turley
8 Quay Court,
Stow-c-Quay
Cambridge CB25 9AU

turley.co.uk

Turley is the trading name of Turley Associates Limited, a company (No. 2235387) registered in England & Wales. Registered office: 6 Atherton Street, Manchester, M3 3GS.

has now gone, none of this affects our assessment that when you balance all the various heritage benefits and harms, the scheme should be supported.

Some others who have commented on these proposals take a view that there is harm. As with the previous NPPF there still remains a need to offset any harms by benefits, and this is now explained in Policy HE6. Strand 4 of that policy considers the balance of heritage harm with public benefits – the latter now include ‘enabling energy efficiency and low carbon heating measures to be employed’. You will recall that this is a key aspect of this project, and one which the Council’s sustainability officer firmly supports.

It is relevant that new Policy CC2 in the NPPF states in strand 2, that ‘substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources’. The phrasing ‘substantial weight’ is relevant here when considering the balance against any heritage harms identified.

It is also worth noting the ‘substantial weight’ the NPPF in policy L2 ascribes to the benefits of making effective use of land. Whilst this has appropriate safeguards in terms of being consistent with the street scene etc and there is scope for interpretation as to what constitutes sensitive redevelopment, this stresses the change in emphasis of this version of the NPPF.

In conclusion, there are some nuances within the new NPPF which suggest even greater support for the proposed library scheme than was previously the case. Perhaps the main changes to the heritage section is the removal of the phrase ‘less than substantial harm’. This could cover a wide spectrum of potential impacts and means now those suggesting harm to heritage assets need to more clearly define what the harm to significance is. The Heritage Impact Assessment we submitted with the application provides this.

I hope these comments are of use. Please do not hesitate to contact me if you have any questions.

Yours sincerely



Planning and Heritage Director

