HUGHES HALL
CAMBRIDGE

24 March 2026

Cambridge City Council
Community Infrastructure Levy Consultation
Greater Cambridge Shared Planning
Mandela House
4 Regent Street
Cambridge
CB2 1BY

Dear Sir/Madam,

Community Infrastructure Levy Consultation

Hughes Hall is a constituent college of the University of Cambridge and a registered charity (no. 1137471). The College expects to bring forward development within the next three years that is primarily for the use of its own students and the delivery of its charitable purposes; to endow, maintain and carry on a college in Cambridge for graduates and mature-age students qualified to be matriculated in the University of Cambridge, and to promote education, learning and research in the University of Cambridge and elsewhere.

The development will include new student accommodation alongside essential college facilities such as a new Porters' Lodge, social and workspace areas, academic meeting and supervision rooms, and flexible events space.

We are responding to ensure that the Charging Schedule and accompanying guidance provide clear and reliable certainty for charitable educational development. For Hughes Hall, uncertainty over charitable relief would create a material project risk, as the proposed CIL could add an estimated £273,420 to the scheme if relief were not available in practice.

It is important that the Charging Authority provides clear and unambiguous guidance on the application of Regulation 43 in respect of charitable relief. Cambridge colleges are long established exempt charities under UK charity law and frequently undertake development that is integral to their educational and research functions. However, the interpretation of what constitutes "charitable purposes" for CIL relief can vary between charging authorities, creating uncertainty. Earlier consultations on CIL for Cambridge recognised the appropriateness of charitable relief for college development, and we see no reason for this position to change.

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Our specific points are as follows:

1. **Confirmation of exemption for student focused development required to deliver the charitable objectives of the College**
   We seek explicit confirmation that development undertaken by charities for student accommodation and related educational facilities is exempt from CIL where the statutory charitable relief criteria are met. While the supporting material acknowledges this in principle, the Charging Schedule and guidance should state this clearly and ensure consistent application in practice.

2. **A simple, published process for claiming charitable relief**
   Although charitable relief is mandatory where criteria are met, it is not automatic and depends on completing the correct procedural steps. The guidance should set out, in plain terms, the process, timing and documentation required, together with the consequences of non compliance.

3. **Incidental ancillary commercial use should not prejudice exemption**
   College developments that are wholly or mainly for educational and student purposes commonly include limited, occasional commercial activity (such as summer schools, conferences or hire of meeting rooms), with any surplus used entirely for charitable purposes. The guidance should confirm that such genuinely incidental ancillary use does not disqualify a development from mandatory charitable relief and should explain how ancillary use will be assessed in practice.

4. **Availability of discretionary charitable relief**
   Where a development includes elements considered commercial rather than ancillary, and eligibility for mandatory relief is therefore uncertain, we request that discretionary charitable relief is available where any surplus is applied wholly to the charitable purpose. Clear guidance on the criteria, process and timing for discretionary relief would provide certainty and reduce development risk.

5. **Adoption of an Exceptional Circumstances Relief (ECR) policy**
   To ensure that educational and charitable development is not rendered undeliverable in circumstances where mandatory or discretionary relief is not available, we ask the Charging Authority to adopt an Exceptional Circumstances Relief policy at the point of introducing the Charging Schedule. ECR exists precisely to prevent CIL from having an unacceptable impact on viability, but can only operate where the policy is in place from the outset. Including it now ensures that a nationally recognised safeguard remains available if needed.

Addressing the points above would provide clarity on the application of charitable relief and ensure that charitable educational development, including student accommodation, can be brought forward in a timely and viable way in line with the Cambridge Local Plan.

Yours sincerely,

[redacted]

Laurie Smith
Bursar