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Greater Cambridge Planning Service

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Dear Sirs,

Draft Greater Cambridge Local Plan for consultation

Representations on behalf of St John's College Cambridge

Thank you for the opportunity to comment on the Draft Greater Cambridge Local Plan for consultation. Savills (UK) Ltd is instructed to make representations on behalf of St John's College Cambridge as a College with a requirement to secure the timely delivery of student accommodation in Cambridge.

Policy H/AH: Affordable housing

Part 9. of the policy states that:

“Any developments of student bedrooms that are equivalent to 10 or more dwellings (calculated using the student accommodation bedrooms to dwellings ratio in the Housing Delivery Test) or any developments of 10 or more self-contained student units will provide a financial contribution for the off-site provision of affordable housing that is equivalent to at least 40% of the bedrooms or units being affordable. On-site delivery of affordable housing can be provided if both the Council(s) and the University agree that this is appropriate.”

Part 10. of the states that:

“An affordable housing contribution will not be sought where the proposed development is:

- a. within an existing university or college campus site, or
- b. for the redevelopment of existing purpose-built student accommodation owned by a university or college, and which will continue to be owned by a university or college after the redevelopment to provide student accommodation to meet its needs.”

Affordability of student accommodation is crucial to diversity and inclusion priorities. A requirement for student accommodation to provide 40% affordable housing assumes that its viability is akin to market housing. The viability of affordable student accommodation is already challenging. The cost to providers, and thereby students would need to increase to a sufficient level to sustain the financial burden of a 40% contribution. Such



a requirement does not provide for or take account of lower income students or those with other challenging socio-economic backgrounds. The proposed policy assumes all students are comparable and opportunities for financial assistance such as student loans put all on par. However, this is not the case. There is a clear disparity between the possible student loan vs student housing costs in Cambridge. Whilst it is acknowledged that there is a need for general affordable housing in Cambridge, there is a continuing need for affordable student accommodation and the proposed policy would inhibit this from being delivered.

Notwithstanding the comments above, if the policy is to apply to student accommodation, the campus layouts in Cambridge often make defining an existing university or college campus site challenging. A Campus, including its accommodation, is made up of sites that are not always contiguous but are seen as being part of the College campus, including by students and for estate management. Any application of the phrase “within an existing university or college campus site” is potentially problematic in this scenario. Accepting that it is also not entirely clear, adding the words “or nearby” in line 1 of policy Part 10.a. would assist, but potential difficulties in interpreting this also goes to demonstrate that the proposed approach to require 40% affordable housing as part of student accommodation is flawed.

If the Council’s interpretation of ‘campus’ is restrictive, it could also lead to unintended consequences. For instance, Colleges feeling compelled to develop additional student accommodation on areas the Council considers the ‘campus’ to make said developments deliverable, and so potentially re-directing pressure for land for the more traditional education and research spaces off campus.

Any discouragement to provide Student Accommodation also risks discouraging the benefit of student accommodation in freeing up family accommodation in the city for families.

Notwithstanding all of these comments, the following revisions to the precise wording of the policy would also be required:

- In Part 9. of the policy it should state “...both the Council(s) and the University or College (as relevant)...” rather than just referring to the University;
- In Part 10. b. the reference to “...existing purpose-built student accommodation...” should be replaced with “...existing student accommodation...” as this exclusion needs to be applicable to all existing student accommodation; and
- In Part 10. b. the reference to “...to meet its needs.” should be replaced with “...to meet its needs or the needs of other Colleges and the University.” to recognise that Colleges / University can work together to meet needs.

Policy H/SA: Student accommodation

Cambridge Colleges are increasing the range of part-time courses and making increased provision to accommodate part-time students in line with Government policy. Students on part-time degree courses are members of Colleges, and because Colleges are the principal providers of accommodation and related services, there is an expectation on Colleges to house more part-time students. For some courses, which often recruit students from across the UK and overseas, part-time study at Cambridge University involves block periods of intensive teaching with mandatory requirements to reside in Cambridge. If these accommodation needs are met elsewhere in the Cambridge housing market, this risks tying up accommodation potentially more suited to the general market needs in Cambridge. To meet this need, it is therefore important that that part 1. a. and part 8. of policy H/SA allow for part-time student accommodation where there is a residential requirement of more than two days per week.

Policy: H/MO: HMOs

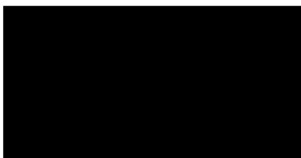
Proposed policy H/MO 1(b) includes a prohibition on “three or more adjacent properties as HMOs”. This is unduly restrictive in the context of College accommodation in Cambridge City Centre, where there are many



examples of high-quality rows of College-owned HMOs. Part 1. a. is considered to be sufficient to avoid over-concentration. Part b. is unduly restrictive in circumstances where, for example, there is a single house already 'sandwiched' between existing HMOs which may be best used as a College HMO. The part b. restriction should be removed from the Policy itself, and instead a more nuanced approach to the definition of over-concentration can be set out in the Supplementary Planning Document already referenced as being considered by the Councils in the consultation.

Thank you again for the opportunity to make comments on the draft Local Plan. The above comments are all made with the intention that Colleges are able to make affordable provision for their students in a way that also avoids unintended consequences on the ability to meet the City's housing need as a whole.

Yours faithfully,



Andy Moffat
Planning Director and Head of Department