

30 January 2026



Greater Cambridge Planning Service

Cambridge City Council and South Cambridgeshire District Council
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Dear Sirs,

Draft Greater Cambridge Local Plan for consultation

Representations on behalf of Jesus 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 Jesus College Cambridge as a College with a requirement to provide world-leading academic teaching and research and to secure and maintain the timely delivery of student accommodation in Cambridge.

Jesus College was founded in 1496 by King Henry VII. It remained one of the smaller Colleges of the University of Cambridge, until the second half of the nineteenth century, when it began a period of expansion. This expansion has continued to the present day. The post-World War II period has seen the College grow to currently be one of the largest Colleges at the University, with approximately 500 undergraduates, 400 graduates and research associates and more than 100 Fellows. In addition, the College is supported by more than 100 faculty, pastoral and administrative staff.

As such, the College is a prominent land and estate owner within Cambridge City Centre and has numerous land holdings in South Cambridgeshire.

This letter sets out the College's comments on relevant policies in the Draft Local Plan as it is important that they are read holistically together. In each instance, the comments are made under the respective policy or sub-policy heading.

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.”

The Government is seeking to make post-16 education (tertiary education) more affordable, accessible and flexible across the entire range of post-16 education, training and skilling up sector, irrespective of type of university/college or education/skills course. It published the *Post-16 Education and Skills White Paper* in October 2025. Although the White Paper seeks to ensure post-16 education becomes more affordable, it also recognises the overall deep financial challenges the tertiary sector is facing, including the world-leading universities such as University of Cambridge, and its colleges like Jesus College. Paragraphs 3.3 and 3.3.1 of the White Paper note:

“3.3 Many providers have to cross-subsidise the costs of domestic teaching and research with income from other types of activity. Income from international student fees is used in this way, along with income from other activities such as franchising. Over time, a growing number of providers have become increasingly reliant on these revenue streams, some of which are not sustainable.

3.3.1 A growing number of higher education providers are facing financial challenges, with 44% of institutions forecasting a deficit in the 2024/25 academic year. Publicly funded teaching activity (i.e. UK domiciled students) at 128 universities in England and Northern Ireland (which accounts for the majority of higher education sector income and expenditure) recorded a deficit of some £1.7bn in 2023/24.⁸⁴ In 2023-2024, research cost recovery for the sector averaged 66% across all research activity”.

Affordability of student accommodation is crucial to Jesus College’s success, and its diversity and inclusion priorities. A requirement for student accommodation to provide 40% affordable housing assumes that its viability is similar to that of the viability of affordable housing within the open market housing sector. However, the viability of maintaining the financial viability of student accommodation has historically been, and continues to be, extremely challenging. This is reflected in the Government’s White Paper. This challenge is confronted by most universities and/or colleges across the country, irrespective of location, size and type of institution.

With this in mind, Jesus College has concerns with the application of a requirement for student accommodation to provide a financial contribution equivalent to 40% affordable housing provision.

At this stage, the College has serious concerns that the financial burden of this policy will ultimately be placed on students in terms of the possibility of increased accommodation costs such as rents, etc. Jesus College, together with other College accommodation providers across the city, will be put in an inevitable position of seeking additional and increased revenues, such as whereby student rents will have to increase to assist with meeting the cost of the affordable housing contribution requirements. Ultimately a combination of a cost of living crisis, as well as the already high costs for student accommodation within the city influence students decisions on whether they can afford to reside in the city for their studies.

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 a ‘level playing field’. However, this is not the case. There is a clear disparity between the possible student loan against 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 the definition or identification of the existing university or college campus sites, including Jesus College, very difficult. 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 for instance, student

accommodation, ancillary facilities and uses, 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 in practice as well as principle.

If the Council’s interpretation of ‘campus’ is used in an overly restrictive manner by decision makers, it could also lead to unintended consequences. For instance, a very real potential outcome of the policy could be that particularly the larger Colleges, such as Jesus College are compelled to develop additional student accommodation on areas the Council considers part of the ‘campus’ to make such proposals financially viable, achievable and deliverable. This in turn could potentially re-direct pressure for land for the more traditional education and research spaces off campus. It will also impact on the open spaces which form an important part of the College’s main site, which provide an essential contribution to the appearance, character and setting of the College, have significant amenity and landscape value, as well as being part of the heritage of the College.

In any case, it is understood that the policy as worded will act as a disincentive and discouragement to provide Purpose Built Student Accommodation (PBSA), which also risks discouraging the benefit of PBSA in freeing up family accommodation in the city for families. There will inevitably be a greater demand for larger properties, such as mid-sized and even family-sized properties within the city generated by students whom would be better served by housing designed or converted for use by students.

Overall, it is considered that the requirement for developers and Colleges, including Jesus College, to provide a 40% financial contribution towards affordable housing is unreasonable and would be ineffective in seeking to meet the housing needs for all in the City. This element of the policy should be removed in order to ensure the policy as a whole remains ‘sound’ as the Plan continues to be prepared. Furthermore, the practical challenges in applying a definition of the word ‘campus’ in Part 10 of the policy, means the policy is too imprecise and ambiguous and is not in accordance with the advice set out in the National Planning Policy Framework (NPPF).

Policy H/SA: Student accommodation

Part 1 of the policy states:

“Planning permission will be granted for the development of new student accommodation for undergraduate and / or postgraduate students subject to the development:

- a. meeting the identified needs of an existing higher educational institution within
- in providing housing for students attending full-time courses of one academic year or more, and
- b. restricting occupancy to students attending full-time courses of at least one academic year, and
- c. within academic terms, the approved schemes being occupied solely as student accommodation for an identified higher education institution(s), and
- d. the development not resulting in the permanent net loss of existing market or affordable housing, and
- e. minimising any potential for antisocial behaviour, impacts on residential amenity, and if appropriate being warden-controlled, and
- f. not significantly detracting from local amenity including parking provision, and where appropriate having management arrangements in place to discourage students from keeping cars in Cambridge and
- g. having an agreed management strategy in place, where appropriate”.

As noted elsewhere within these representations, the Government is seeking to make post-16 education (tertiary education) more accessible and flexible. It published the *Post-16 Education and Skills White Paper* in October 2025, which seeks to introduce a new Lifelong Learning Entitlement (LLE) model of study. The LLE will provide options and clear routes for people to move between universities, colleges and training providers, building up qualifications over time rather than completing tertiary level qualifications (including university degrees) in one go. The clear intention is to make it easier for people to learn, retrain and upskill at any stage

of life. The Government has identified that many options for post-16 study are too rigid and expensive for many prospective students.

Within this context, Jesus College, together with most of the other Cambridge Colleges, are increasing the availability and range of part-time and flexible courses. Part of this offer of an increased number of part-time courses is to increase the provision of accommodation offer to part-time and flexible students in line with Government policy and market dynamics. 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.

As one of the world's leading Universities, the University of Cambridge, comprising its many Colleges, attracts students from across the world. Many of the courses provided by Jesus College, recruit both domestic (UK residing) and international students, are offered on a part-time study basis at Cambridge University. These part time courses sometimes comprise sustained block periods of intensive teaching with mandatory requirements to reside within the city of Cambridge, often for overseas or UK students who have to travel long distances for the required teaching provision.

If there is an inadequate amount and level of student accommodation offered by Jesus College (and the other Colleges), housing needs will have to be met by other housing sectors, principally the private housing sector. This will increase demand for such housing, which will risk taking up accommodation potentially more suited to the general market needs in Cambridge. The overall effect of the policy will exacerbate housing need across the wider housing sector within the city. This real possibility could conflict with the requirements of bullet point d).

In addition, there is the increased risk that students will have little choice but to reside in other locations within Cambridge or the surrounding area. This may not be practicable for many students and will lessen the attractiveness of day to day living for students. There is an increased likelihood that students will have to commute to the College every day for study and research and socialising. Part time students living away from the principal Jesus College campus may also feel remote and isolated from the central Jesus campus and university life.

Part 8 states:

“Where students do not attend full-time courses of one academic year or more, or for academic staff whose length of stay is less than six months, their accommodation requirements will be expected to be provided within the site of the institution which they attend; or by making effective use of existing student accommodation within Cambridge outside term time; or by use of home-stay accommodation”.

In light of the Government's emerging policy thrust which, amongst other objectives, seeks to increase the availability and access to part time study, it is considered that the proposed policy H/SA is too restrictive and onerous with regards to part-time student accommodation at University and further education establishments, including Jesus College.

To meet this need, it is therefore important that the wording of part 1 a) and part 8) of policy H/SA are relaxed to allow for part-time student accommodation where there is a residential requirement for individuals to study at Jesus College more than two days per week.

Policy: H/MO: Houses in Multiple Occupation

Proposed policy H/MO 1 a) and b) states that:

“1. Proposals for HMOs that require planning permission (C4 or sui generis) will be supported, where:
a. the proposed HMO does not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area;

b. would not result in an existing residential property (C3 use) being ‘sandwiched’ between two HMOs or result in three or more adjacent properties as HMOs;”

Jesus College, being one of the largest Colleges, has 475 bedrooms in a variety of shared houses, which are primarily available as accommodation for postgraduate and undergraduate students at the College. The available accommodation provided by shared houses is broadly evenly split between undergraduate and postgraduate students. The shared houses are located along Jesus Lane, Park Street, Lower Park Street, Malcolm Street and Maids Causeway. The houses range in sizes, between three bedrooms to sixteen bedrooms. All are classified as being Houses in Multiple Occupation (HMO) (Use Class C4).

The concentration of these HMOs provides for a sense of community amongst the resident students, and enables the College to provide more effective welfare and support services than if the HMOs were more scattered. These services are usually provided by staff based at the main College site, such as porters or housekeepers.

The first two bullet points a) and b) seek to restrict the density of Houses in Multiple Occupation (HMO) within the city. Jesus College, objects to the imposition and wording of both bullet points. Bullet point a) is to avoid an ‘over concentration’ of HMOs. However, ‘over concentration’ is not specifically or clearly defined within wording of the bullet point, the wider policy or the supporting information. Without further clarification (which could be contained in Supplementary Planning Document), the policy appears to be too vague and imprecise to be effective or meaningful. Indeed the policy would appear to be contrary to Policy 16 bullet point d) of the National Planning Policy Framework (NPPF), which advises that ‘plans should ... contain policies that are clearly written, and unambiguous, so it is evident how a decision maker should react to development proposals’.

In addition, it is evident that there is clear duplication regarding the wording and purpose of bullet points a) and b). It is considered that bullet point a) is unnecessary in light of the fact that bullet point b) seeks to also restrict the concentration and density of Houses in Multiple Occupation (HMO), albeit with more clarity and detail.

Moreover, bullet point b) places an unreasonable restriction on the location, amount and density of Houses in Multiple Occupation (HMOs). The intention to restrict the use of properties as HMOs to a maximum of two adjacent properties is unduly restrictive. This is particularly the case in the context of College accommodation available to Jesus College in Cambridge City Centre, where there are several examples of high-quality rows of College-owned HMOs. Part b) is unduly restrictive in circumstances where, for example, there is a single house already ‘sandwiched’ between existing HMOs which, given the surrounding uses, its optimal use could be as a College HMO (Class C4), or houses that are nearby to existing HMO groups.

Jesus College, together with many other University Colleges, currently has several examples of Houses in Multiple Occupation (HMOs) which are located adjacent to each other and within small groupings within the city. There are therefore significant concerns raised regarding the intention and purpose of this proposed policy. Notwithstanding our concerns regarding the imprecise wording of bullet point a), it is considered that there is no need for both bullet points a) and b). Subject to further clarification, bullet point a) is considered to be sufficient to avoid concerns regarding the potential for over-concentration of HMOs in a locality. The part b) restriction should be removed from the Policy itself, and instead a more nuanced and well thought out 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.

Policy J/FD – Faculty development and specialist/language schools

The policy states (*inter alia*):

“Higher Education Institutions

Faculty development

The development or redevelopment of faculty, academic research and academic administrative sites for higher education institutions, (including medical teaching/hospital facilities) will be supported when it meets the principles set out in this policy and other planning policies.

University in the City Centre

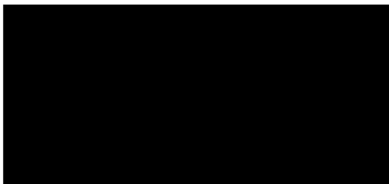
In the city centre, these uses will be permitted provided they:

- a. make effective use of land, including a mix of uses on larger sites to meet the needs of the relevant higher education institution, and
- b. take reasonable opportunities to improve circulation for pedestrians and cyclists, together with public realm improvements, reductions in car parking provision and the introduction of active frontages at ground floor level".

Jesus College welcomes and supports the broad thrust and drive of policy J/FD, which provides clear support for academic, education and education-related development and uses within the City Centre, including at the Jesus College campus and estate. It is noted that uses which make the effective use of land, including a mix of uses to meet the needs of higher education institution such as Jesus College, and this is also supported.

Thank you again for the opportunity to make comments on the draft Local Plan. The above comments and representations are all made with the intention that Jesus College is able to offer a sufficient and varied amount of accommodation to its full time and part time students and their families for each and every successive academic year. The College also seeks satisfactory high quality and affordable housing provision for its students in a way that also avoids unintended consequences on the ability to meet the City's housing need as a whole.

Yours faithfully,

A large black rectangular redaction box covering the signature area of the letter.

Andy Moffat
Planning Director and Head of Department