**Policy H/SA – Student Accommodation**

**Representation:** Objection

**Soundness Tests:** Not positively prepared, not justified and not effective (NPPF paragraph 36).

**Summary**

Policy H/SA should be amended to remove the requirement for applicants to provide, at planning application stage, evidence of agreed interest to occupy from at least one existing educational establishment.

The objective of ensuring that purpose-built student accommodation responds to genuine educational need is supported. However, the requirement for prior institutional endorsement is not justified by the evidence base, is not necessary to achieve the policy objective and risks preventing the delivery of accommodation needed to address identified student housing requirements. There is a significant need for student accommodation within Cambridge and this is acknowledged by the Council. The Plan allocates a total of 1,629 new student units over the plan period, the majority of which would be located at Eddington. It is not considered reasonable and representative of locational demand for the majority of the new units to be located in one location on the edge of the City.

**Positively Prepared**

The National Planning Policy Framework requires plans to be positively prepared by providing a strategy which seeks, as a minimum, to meet objectively assessed needs.

The Councils' evidence identifies a requirement for additional student accommodation over the plan period. The evidence also recognises that student accommodation contributes to meeting housing needs and can reduce pressure on the wider housing market.[1] The Strategic Housing Policy supports appropriately located purpose-built accommodation where there is a need and where it does nor impact on the supply of family housing.

The proposed policy H/SA does not positively facilitate the delivery of additional accommodation where need exists. Instead, it requires applicants to secure support from an educational institution before planning permission is granted, regardless of whether objective evidence demonstrates a genuine accommodation requirement.

The policy therefore risks constraining the delivery of accommodation needed to meet identified student housing needs rather than positively supporting its provision.

**Justified**

The NPPF requires policies to be based on proportionate evidence and to represent an appropriate strategy when compared with reasonable alternatives.

No evidence has been provided demonstrating that an application-stage expression of institutional interest is necessary to establish student accommodation need.

The evidence base instead demonstrates:

- substantial demand for additional student accommodation within Greater Cambridge;[2]
- continuing pressures within postgraduate accommodation provision;[3]

- reliance by significant numbers of postgraduate students upon the private rented sector;[4] and
- the importance of student accommodation in reducing pressure on conventional housing stock.[1]

The University of Cambridge publicly states that not all postgraduate students are accommodated within colleges and that many postgraduate students live within private rented accommodation. This need for postgraduate accommodation is acknowledged by the Council. It further confirms that there is strong demand for accommodation within Cambridge.[4]

These factors provide direct evidence of need.

There is no obvious planning reason why such need cannot be demonstrated through objective evidence including:

- published housing needs evidence;
- institutional accommodation capacity constraints;
- postgraduate accommodation shortages;
- student occupancy data; and
- wider market evidence.

Such evidence provides a more direct and reliable measure of student accommodation need than the existence or otherwise of an application-stage expression of interest from a particular institution.

The proposed policy therefore adopts a more restrictive approach than is necessary to achieve its objectives and has not been justified through proportionate evidence.

**Effective**

The NPPF requires policies to be deliverable and effective.

The requirement for institutional interest at application stage risks creating a practical barrier to delivery.

Educational institutions will often be reluctant to commit to accommodation arrangements before:

- planning permission has been secured;
- development finance has been arranged;
- delivery programmes are confirmed; and
- development risks have been substantially reduced.

As a result, otherwise suitable schemes addressing identified accommodation shortages may be unable to satisfy the policy despite clear evidence of demand.

The policy is particularly problematic because it requires:

1. evidence of agreed institutional interest at application stage; and

2. a formal agreement prior to occupation.

The latter requirement already provides an effective and enforceable mechanism to ensure that completed accommodation is occupied by eligible students associated with educational establishments.

The former requirement duplicates that safeguard and may prevent schemes from obtaining consent notwithstanding the existence of demonstrable need.

The policy therefore risks reducing delivery of student accommodation without providing any additional planning benefit.

**Modification Required**

The requirement for:

"Evidence at application stage demonstrating that there is agreed interest to occupy with at least one existing educational establishment..."

should be replaced with:

"Evidence demonstrating that the proposed development responds to an identified need for student accommodation. Such evidence may include support from educational establishments, identified accommodation shortages, institutional accommodation capacity constraints, published student housing evidence, evidence of postgraduate accommodation need, student reliance on the private rented sector, or other objective evidence of demand."

The requirement for a formal agreement prior to occupation should be retained to secure compliance with occupancy requirements.

**Conclusion**

Policy H/SA is not justified, effective or positively prepared because it makes the delivery of student accommodation dependent upon obtaining institutional support at planning application stage rather than demonstrating the existence of genuine accommodation need.

The policy should instead permit applicants to establish need through objective evidence. This would better align the policy with the evidence base, support delivery of identified student accommodation requirements and continue to ensure that completed developments remain occupied by eligible students.

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**Footnotes**

1. Greater Cambridge Local Plan Proposed Submission (2026), Policy H/SA supporting text and Housing Delivery evidence.
2. Iceni Projects, *Housing Needs of Specific Groups in Cambridge and South Cambridgeshire* (August 2025), identifying a requirement for additional student accommodation within Greater Cambridge.
3. Cambridge Centre for Housing and Planning Research, *Assessment of Student Housing Demand and Supply for Cambridge City Council* (2017).

4. University of Cambridge, *Postgraduate Accommodation* (Postgraduate accommodation | Postgraduate Study). The University confirms that not all postgraduate students live in College accommodation, that many live in private rented accommodation and that there is strong demand for accommodation within Cambridge.

**Policy H/AH – Affordable Housing**

**Representation:** Objection

**Soundness Tests:** Not positively prepared, not justified and not effective (NPPF paragraph 36).

**Summary**

Policy H/AH requires that all major developments for housing will provide at least 40% of the new homes on site as affordable housing. This requirement applies to all residential developments including specialist accommodation.

Student accommodation is specifically referenced within the Policy and there is a requirement that 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.

Student accommodation falls within a Sui-Generis Use Class, it is not C3 residential. It is therefore considered wholly unreasonable for affordable housing contributions to be sought from non-residential (C3 Use Class) applications. No sound justification has been provided to justify an affordable housing contribution being sought on buildings or land which is not owned by the University of Cambridge, ARU or the Cambridge Colleges. There are enough challenges at present which impact on the delivery of PBSA and it would not be viable for major student schemes to delivery a contribution towards the delivery of affordable housing off-site. Viability Assessments to demonstrate this will inevitably have to be prepared and this will further delay the delivery of needed student accommodation within Cambridge.

If this Policy is considered to be sound, there must be an allowance for a viability assessment to reduce the level of any affordable housing contribution sought from future PBSA schemes to be introduced to the Policy.