

# Interim Planning Policy Guidance on The Protection of Public Houses in the City of Cambridge

## Public Participation Report

1. Introduction

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## 1. Introduction

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8081 - Januarys	Object	<p>-Representations made on behalf of Bondsway Ltd (BL) and Lucy Cavendish College (LCC), prospective joint applicants for the proposed redevelopment of the former Ranch PH for essential new Student Accommodation for mature female students to be occupied by LCC.</p> <p>-BL have considerable concerns over the proposed policy approach towards the change of use of ALL Public Houses and are especially concerned that unfair opposition could be attracted to their application on the basis of the IPPG, which has not been fully considered.</p> <p>-Concern that the Council has overreacted, bowed to pressure groups and not thought clearly on the issue.</p>	<p>Concerns noted. This issue is covered in new paragraph 2.2 of the IPPG which reads "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p>	<p>Insert new paragraph 2.2 to read "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p>
8141 - Januarys	Object	<p>Paragraph 6.17 of the GVA report recommends, a flexible policy approach, and provides criteria for the consideration of the re-development of such sites in appropriate circumstances. The IPPG fails to reflect this and cuts across the NPPF and therefore the IPPG cannot be progressed in isolation of a wider Local Plan review.</p> <p>The NPPF makes it clear plans should be based on the presumption in favour of sustainable development, with clear local policies. This is not reflected in the IPPG, which expressly seeks to prevent development.</p>	<p>Concerns noted. However, it is considered that the IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public House Study will be incorporated into the Local Plan Review as it progresses.</p>	<p>Incorporate the IPPG and the findings of its supporting Cambridge Public House Study into the Local Plan Review as it progresses.</p>

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8142 - Januarys	Object	<p>GVA's commission and the LPA's subsequent brief should be made available. The Public House Study is fundamentally unsound to deal with this issue in isolation of the range of issues that inform a Local Plan review.</p> <p>-GVA are potentially compromised to comment on the subject given their vested interest in the protection of Public Houses.</p> <p>-Are GVA Humberts (a Leisure Surveyor) best placed to evaluate the issue?</p> <p>-We question whether the report is appropriately commissioned as the report appears to be a defence of the Pub industry and of public houses, and not a balanced or objective assessment.</p>	<p>Concerns noted. The Council produced the brief for this work and appointed the consultants following the Council's established procurement protocols. The IPPG and the findings of the Cambridge Public House Study will be incorporated into the Cambridge Local Plan Review as it progresses. It is recognised that the IPPG and the associated Cambridge Public House Study are amongst the first of their kind to be produced in England to provide a locally assessed evidence base on public houses. Given local concerns relating to the loss of public houses, it is reasonable to produce some interim guidance prior to the new Local Plan being adopted.</p>	Incorporate the IPPG and the findings of the Cambridge Public House Study into the Local Plan Review process.
14809 - Charles Wells Ltd	Object	<p>No stakeholder consultations with operators, breweries and owners of public houses in Cambridge. Necessary prior to the adoption of the IPPG. The survey carried out from which the Cambridge Public House Study was a tick-box exercise based on a visual drive-by - no initial consultations. Consultations and resulting input are vitally important prior to any adoption of the IPPG to ensure the Council fully understand business models, social and economic change and their effects on the day to day operations of pubs, and the reasons why both disposal and acquisition of licensed properties takes place.</p>	<p>Concerns noted. Stakeholder consultations were carried out in advance of the development process. These included CAMRA, breweries and Cambridge Past, Present &amp; Future. Each pub was separately visited in order to conduct the audit stage.</p> <p>These consultations, visits and the Public House Study ensure that the Council understands the issues surrounding the loss of public houses in Cambridge.</p>	No further action.

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13083 - Caldecotte Consultants	Object	I object to the introduction of this Interim Planning Policy Guidance as the rationale behind the 'community catchments' is unsound, furthermore the guidance in part is onerous, inflexible and disproportionate which will place unnecessary financial burdens on development; conflicting with paragraphs 21 and 153 of the Framework.	Concerns noted. However, it is considered that the IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. The Council accepts that this criterion as worded is unclear. The needs to demonstrate that there is adequate provision available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius, is for the particular area within which the public house is located. How this would work in practice would be:  1. Identify a 400m buffer from the location of the proposed pub loss. 2. Identify the number of working age adults within this buffer. 3. Identify what alternative public houses there are within this buffer or nearby. 4. Calculate how many public houses there are per working age adult.	Simplify development criteria in paragraph 4.5; and amend Annex C, Community Catchments and Consultation to clarify how it can be demonstrated that the local community no longer needs the public house or any alternative 'A' or 'D1' class use and its loss would not damage the availability of local commercial or community facilities that provide for day-to-day needs in the local area.
13035 - Natural England	Support	No comment	Noted.	No further action.
8657 - Cambridge Past, Present and Future	Support	CambridgePPF broadly welcomes the proposals contained within the IPPG and that these provisions will become a 'material consideration' in determining planning applications in the City. We believe these provisions are urgently required in order that the new protections, given to public houses under NPPF paragraph 70, are properly and consistently applied in the City.	Support noted.	No further action.
6859	Support	I approve of this plan, but the Council will need to be vigilant to ensure that public house owners do genuinely exert their best efforts to keep buildings open as pubs.	Support noted.	No further action.

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<i>Scope and Purpose</i>				
6947	Object	<ul style="list-style-type: none"> <li>- The section could be more positive about the benefits of the city's public houses</li> <li>- There is no reference to the particular development pressures facing the city</li> <li>- Is this simply a response to community concern or is it an attempt to develop policy that prioritises the maintenance of public houses over other forms of development?</li> </ul>	Concerns noted. The IPPG has been produced to act as a material consideration in the determination of any planning applications affecting public houses in Cambridge, in advance of the production of the Cambridge Local Plan Towards 2031. It is considered that the paragraphs in the 'Scope and Purpose' section set out the reasoning behind the production of the IPPG	No further action.
14689 - British Beer & Pub Association	Object	We object to the assertion that closed public houses may be more viable if managed under a different system or more immune to closure than tied pubs. There is no evidence to support this claim, on the contrary according to recent pub closure statistics freehold pubs are actually closing at a faster rate than tied pubs.	Concern noted. The Council is not asserting that freehold public houses are necessarily more viable than tied public houses, the point being raised is that different ways of managing premises can be more than successful than others. Hence just because one operator has not been able to make a success of a pub does not mean that all operators will also fail.	No further action.
12776	Support	I agree that with supermarkets selling alcohol so cheaply and being so easy to buy from, pubs in the quantity Cambridge had didn't stand a chance. I am more sad about a pub building being knocked down for flats than I am to see it shut. I'd much rather the structure was kept and maintained and used for other uses for the community. Once they're flats, they can't be changed back into pubs again.	<p>Concerns noted. The IPPG sets out criteria for the consideration of planning applications affecting public houses and does seek to protect public houses and their buildings by retaining the original use. Where marketing has shown that the public house is not viable, the measures of protecting against the loss of the building itself relate to whether it is a Listed Building, within a Conservation Area or protected by an Article 4 direction. The retention of the building itself could be achieved by applying for listing of pubs of high architectural quality, extending Conservation Areas to incorporate pub buildings of architectural merit, and/or enacting Article 4 directions to remove permitted development rights in respect of demolition. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications.</p> <p>Whilst a number of public houses are already listed, the Council's Conservation Officers are already involved in applying for listing of buildings throughout Cambridge, as necessary, and considering and amending the boundaries of Conservation Areas. The Council will consider the potential to introduce Article 4 directions to protect public houses.</p>	The Council will consider the potential to introduce Article 4 directions to protect public houses. This a separate legal process to that of the IPPG.

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8781	Support	We support the prevention of pub site redevelopment - enough is enough.	Support noted.	No further action.
12784	Support	The change of use from public house to housing is often seen as a way of making a 'quick buck' by developers. The communities loose when this happens.	Support noted.	No further action.
<i>Status of the IPPG</i>				
14690 - British Beer & Pub Association	Object	We object to the development of an IPPG for this purpose which in our view goes against the spirit of the NPPF to reduce obstacles to growth and allow for businesses to change and adapt to a changing market.	Concern noted. The NPPF also makes it clear that pubs are capable of being important community facilities and should be protected. This has been confirmed at appeal for a number of planning applications in Cambridge (e.g. the Unicorn and the Carpenters Arms), where lack of marketing as a public house was a key issue. The IPPG does allow flexibility for redevelopment where the criteria in the document are met.	No further action.

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8086 - Januarys	Object	-The Council needs to demonstrate that the adverse impacts of permitting the development of a PH site would significantly and demonstrably outweigh the benefits of the development assessed against the NPPF policies "as a whole" (NPPF para 14).	Concerns noted. The IPPG is not intended to conflict with the NPPF. The IPPG has been amended to reflect the need to further explain how it works with the NPPF. A new paragraph 2.2 has been inserted to read: "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses." A new sentence has been inserted on the end of paragraph 2.4 to read "Given these significant economic and social benefits, it is vital to consider safeguarding pubs in order to ensure sustainable development as per the NPPF." Furthermore a number of additional paragraphs were added at paragraph 2.10 onwards to read: This need for flexibility is also highlighted in Paragraph 153 with regard to Local Plans. This states that: "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development" (emphasis underlined). The IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti development and that there is the flexibility to allow development where it would be in the interests of the economy or community. Notwithstanding the terms of the IPPG, public houses will retain a significant degree of economic	<p>Insert a new paragraph 2.2 to read: "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p> <p>Insert a new sentence on the end of paragraph 2.4 to read "Given these significant economic and social benefits, it is vital to consider safeguarding pubs in order to ensure sustainable development as per the NPPF."</p> <p>Insert a number of additional paragraphs at paragraph 2.10 onwards to read:</p> <p>"This need for flexibility is also highlighted in Paragraph 153 with regard to Local Plans. This states that: "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development" (emphasis underlined). The IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti development and that there is the flexibility to allow development where it would be in the interests of the economy or community. Notwithstanding the terms of the IPPG, public</p>

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flexibility with their ability to change to any of Use Classes A1, A2 or A3 without planning consent. Please note that it is not proposed to withdraw these rights (through the use of an Article IV Direction) in order to retain sufficient flexibility to allow the pub market to be able to adapt to rapid change. Paragraph 130 of the NPPF is also relevant. It refers to the deliberate neglect of heritage assets and would relate to public houses where they are locally or nationally listed or part of a Conservation Area. The NPPF advises that the deteriorated state of the heritage asset should not be taken into account in any planning decision. The NPPF definition of a heritage asset is included in the Glossary to this IPPG.

Local Existing policy relating to pubs and community facilities is set out in the Cambridge Local Plan (2006) (policies saved in July 2009) - Saved Policy 6/6 (Change of Use in the City Centre), Saved Policy 6/7 (Shopping Development and Change of Use in District and Local Centres), Saved Policy 6/10 (Food & Drink Outlets), Saved Policy 5/11 (Community Facilities: Protection of Existing Facilities), Saved Policy 5/12 (New Community Facilities) and Saved Policy 3/10 (Sub-division of Existing Plots). None of the first three policies seek to prevent the redevelopment or change of use of public houses. Saved Policy 5/11 relates to community facilities. Although it does not specifically include public houses, in the recent appeal dismissal concerning The Carpenters Arms (182-186 Victoria Road, Cambridge), the Inspector followed advice in the NPPF concerning public houses being community facilities and applied significant weight to the NPPF in respect of this guidance. The Inspector concluded that in order to determine whether a change of use of the building (a valued community facility) is necessary, it should first be marketed as a public house. This approach would also be consistent with how applications for changes of use in relation to other local community facilities are dealt with under policy 5/11 of the Local Plan. The inspector therefore decided to treat public houses as a community facility for the purposes of Saved Policy 5/11.

In respect of new public houses, Saved Policy 5/12

houses will retain a significant degree of economic flexibility with their ability to change to any of Use Classes A1, A2 or A3 without planning consent. Please note that it is not proposed to withdraw these rights (through the use of an Article IV Direction) in order to retain sufficient flexibility to allow the pub market to be able to adapt to rapid change. Paragraph 130 of the NPPF is also relevant. It refers to the deliberate neglect of heritage assets and would relate to public houses where they are locally or nationally listed or part of a Conservation Area. The NPPF advises that the deteriorated state of the heritage asset should not be taken into account in any planning decision. The NPPF definition of a heritage asset is included in the Glossary to this IPPG.

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14698 - Januarys Consultant Surveyors	<p data-bbox="421 916 483 938">Object</p> <p data-bbox="528 916 1039 986">The status of the IPPG has not been clarified, and the weight to be attached to it is equally unclear. This needs to be corrected.</p> <p data-bbox="528 1018 1039 1136">In our view the weight attached to the IPPG should be extremely limited. It is being produced off the back of an evidence base, which has not been consulted upon or examined in the way a policy emerging through the Local Plan would be.</p> <p data-bbox="528 1168 1039 1262">The NPPF advises that weight given to policies in emerging plans should accord to the stage of plan preparation. In the event of unresolved objections, consistency with the existing plan will also be a factor.</p>	<p data-bbox="1070 268 1568 491">"New Community Facilities" would apply. The NPPF states that a public house is a community facility and therefore new public houses would be determined against Saved Policy 5/12. Essentially, it is necessary to prove a local need in order to be in accordance with the Policy. However, it would also be necessary to adhere to other general design policies and have regard to normal environmental and amenity considerations.</p> <p data-bbox="1070 497 1568 810">In respect of the protection or retention of large pub gardens or car parks, Saved Policy 3/10 "Sub-division of Existing Plots" will be applied. Large outdoor spaces attached to pubs will be subject to similar pressures for residential development as for large private dwellinghouse gardens or other open spaces. This Policy includes as criterion b, the need to provide adequate amenity space and parking for existing properties. Therefore, residential development proposed on pub gardens or car parks will need to ensure that there is sufficient open amenity space left for the needs of the pub and its customers."</p> <p data-bbox="1070 916 1568 1385">Concerns noted. It is considered that the IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. Given local concerns, relating to the loss of public houses, it is reasonable to produce some interim guidance prior to the new Local Plan being adopted. The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public Houses Study will be incorporated into the Local Plan Review as it progresses.</p>	<p data-bbox="1581 268 2078 290">policy 5/11 of the Local Plan.</p> <p data-bbox="1581 296 2078 539">In respect of new public houses, Saved Policy 5/12 "New Community Facilities" would apply. The NPPF states that a public house is a community facility and therefore new public houses would be determined against Saved Policy 5/12. Essentially, it is necessary to prove a local need in order to be in accordance with the Policy. However, it would also be necessary to adhere to other general design policies and have regard to normal environmental and amenity considerations.</p> <p data-bbox="1581 545 2078 863">In respect of the protection or retention of large pub gardens or car parks, Saved Policy 3/10 "Sub-division of Existing Plots" will be applied. Large outdoor spaces attached to pubs will be subject to similar pressures for residential development as for large private dwellinghouse gardens or other open spaces. This Policy includes as criterion b, the need to provide adequate amenity space and parking for existing properties. Therefore, residential development proposed on pub gardens or car parks will need to ensure that there is sufficient open amenity space left for the needs of the pub and its customers."</p>



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8099 - Januarys	Object	No policies in the Development Plan that protect Public houses. NPPF: The Development Plan remains the starting point for decision taking. Therefore little weight can be attached to the IPPG at this point. The IPPG fails to clarify what weight can reasonably be given to the guidance, a major shortcoming of the document.	Concerns noted. The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public Houses Study will be incorporated into the Local Plan Review as it progresses.	The Council will incorporate the IPPG and the findings of the Cambridge Public Houses Study into the Local Plan Review process.
14778	Object	Concern remains that the weight officers and members are able to give to Informal Planning Policy Guidance until the new Local Plan is in place may be insufficient against pressures from developers however.	Concern noted. The IPPG will nonetheless improve the existing policy situation on public houses in Cambridge. The Council is also in the process of developing overarching policy for the protection of public houses within the new Local Plan and has consulted on a range of options on public houses in the recent consultation on the Cambridge Local Plan Towards 2031- Issues and Options report.	Continue to progress the development of the Cambridge Local Plan Towards 2031.
14855 - Old Chesterton Residents' Association	Object	Old Chesterton Residents Association (OCRA) welcomes the IPPG on pubs and the intent to incorporate strengthened protection for the retention of pubs into the forthcoming Local Plan. Concern remains that the weight officers and members are able to give to Informal Planning Policy Guidance until the new Local Plan is in place may be insufficient against pressures from developers however.	Concern noted. The IPPG will nonetheless improve the existing policy situation on public houses in Cambridge. The Council is also in the process of developing overarching policy for the protection of public houses within the new Local Plan and has consulted on a range of options on public houses in the recent consultation on the Cambridge Local Plan Towards 2031- Issues and Options report.	Continue to progress the Cambridge Local Plan Towards 2031.
8112 - Januarys	Object	-The IPPG should state who is precisely concerned with the loss of public houses. -"local public concerns" needs to be clarified as to who this is apart from known pressure groups CPPF (Cambridge Past Present & Future) & CAMRA (Campaign for Real Ale). -The IPPG makes no reference to the dramatic increase in the number of Coffee Shops and alternative meeting places in the City, and the advent of social media, which has in part usurped the traditional "visit to the pub". -The IPPG is over simplistic.	As discussed in paragraph 1.5 of the consultation document, the 'local public concerns' expressed have included representations to a number of planning applications, stories in the local press, as well as interest from pressure groups such as CAMRA and Cambridge Past, Present and Future. Whilst the Council does not believe it is necessary to provide detail on these concerned individuals and groups within the IPPG, it is convinced that the concerns expressed are both genuine and legitimate.	No further action

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18600 - Januarys	Object	<p>It is unclear from the IPPG whether the Council has the power to adopt a planning policy other than by reliance on procedures laid down by Part 2 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Regulations 2012. These make it clear policy must be prepared as a local development document and comply with requirements for consultation, examination and SEA. The statutory power being used needs to be clarified, without this adpotion of the IPPG is arguably unlawful.</p> <p>IPPG should be taken through the Local Plan process and is premature at the moment.</p>	<p>Concerns noted. The IPPG has been produced to act as a material consideration in the determination of any planning application affecting public houses in Cambridge, in advance of the production of the Cambridge Local Plan Towards 2031. The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public House Study will be incorporated into the Local Plan Review as it progresses.</p>	<p>Incorporate the IPPG and the findings of its supporting Cambridge Public House Study into the Local Plan Review as it progresses.</p>
12801	Support	<p>a clear policy on pubs needs to be incorporated into the local plan. It is good to take this opportunity to strenthen the protection of pubs under the local plan.</p>	<p>Support noted. The Cambridge Local Plan Towards 2031: Issues and Options considers a number of options pertaining to the protection of public houses. Consideration of consultation responses to the Issues and Options report is underway.</p>	<p>No further action.</p>
6948	Support	<p>This is a pressing issue and interim guidance is necessary and welcome.</p>	<p>Support noted.</p>	<p>No further action.</p>

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14811 - Charles Wells Ltd	Object	We recognise local concern at the recent decline in the number of pubs within the City of Cambridge, a decline that reflects national trends. We anticipate that the number of traditional pubs will continue to decline with changing social circumstances and consumer spending patterns, and that the Council should accept this national situation. As supermarkets and other outlets come to dominate the mass market for beers and other alcoholic beverages, pubs must look increasingly to new business models that serve emerging niche markets where added value is critical to success, but this cannot apply in all circumstances.	Concerns noted. The IPPG allows for the redevelopment of public houses when the criteria in it are met. When the circumstances described by the respondent occur, and demand for a public house declines, it will be able to be redeveloped for alternative uses as long as it can demonstrate the criteria are met.	No further action.
11290	Object	I would like to see an amendment to planning policy to allow public consultation on whether the change of use of a pub to any other premises other than a pub with additional food facilities, eg. a restaurant attached would have to gain a proportion of the local area consent before any other use such as a shop or residential development was allowed. I strongly disagree with paragraphs 2.8 and 2.9, but support the previous and following paragraphs.	Concerns noted. The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The only way to achieve this would be make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 Directions.
11812 - Metropolispd	Support	Representation submitted on behalf of Pace Investments Ltd, freehold owners of the land at Betjeman House/(new) Botanic House, Francis House, the Osbourne Arms and Flying Pig PHs, Hills Road, Cambridge. Support for the general theme of the IPPG and the very important role community uses provide. The consultation report: -recognises the crucial role that pubs play in maintaining the vibrancy and vitality of local neighbourhoods and their place and contribution to the community; -promotes a robust planning policy approach to provide protection in appropriate circumstances and to address a trend in falling numbers.	Support noted.	No further action.

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<i>Area covered by this IPPG</i>				
14688 - British Beer & Pub Association	Object	<p>Pubs are under severe pressure from tax and regulatory burdens.</p> <p>Support pubs by alleviating the burdens affecting them, where possible.</p> <p>The Council might consider looking at:</p> <ul style="list-style-type: none"> <li>* Offering additional discretionary business rates relief to small businesses and those offering additional community services and value to the community.</li> <li>* Taking a more positive approach to regulatory enforcement, particularly with regard to licensing as this can be one of the biggest burdens on business.</li> <li>* Taking a positive and flexible attitude to planning and licensing to allow new pub businesses to start up and succeed if and where there is demand.</li> </ul>	<p>Concerns noted. Business rate relief and licensing issues are outside the scope of planning and the IPPG and are not addressed this response. However your concerns will be passed onto relevant colleagues.</p> <p>With regard taking a positive and flexible attitude in planning to allow new pubs, the Council agrees with point and will take a positive approach to any proposals received.</p>	No further action.
<i>Planning Policy Context</i>				
14692 - British Beer & Pub Association	Object	<p>We object to the interpretation of the wording of the National Planning Policy Framework. In our view some of the quoted sections are taken out of context and used to justify the Council's restrictive planning policies in this document. The policy as a whole goes entirely against the spirits and intentions of the NPPF which sought to alleviate cost and burdens on business from the planning system.</p>	<p>Concern noted. The NPPF is clear about not placing unnecessary burdens on business. Notwithstanding this, the NPPF is also clear about the need to protect community facilities including public houses. Furthermore, in the recent appeal dismissal concerning The Carpenters Arms (182-186 Victoria Road, Cambridge), the Inspector followed advice in the NPPF concerning public houses being community facilities and applied significant weight to the NPPF in respect of this guidance. The Inspector decided that according to the NPPF, to determine whether a change of use of the building (a valued community facility) is necessary, it should first be marketed as a public house. This approach would also be consistent with how applications for changes of use in relation to other local community facilities are dealt with under policy 5/11 of the Local Plan.</p> <p>The IPPG is attempting to strike a balance between the needs of business and the newly arisen issue surrounding loss of public houses.</p>	No further action.
14856 - Old Chesterton Residents' Association	Object	<p>Several significant appeal judgements must be addressed in the approved IPPG and any new Local Plan policy - namely the appeals at the Plough at Shepreth, The Unicorn and The Carpenters Arms.</p>	<p>Concerns noted. The IPPG has been amended at new paragraph 2.16 and new paragraph 4.9 to make reference to appeal decisions affecting public houses in and around Cambridge.</p>	Amend IPPG at new paragraphs 2.16 and 4.9 to make reference to appeal decisions affecting public houses in and around Cambridge.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14693 - British Beer & Pub Association	Object	We object to the assertion that public houses will have enough flexibility simply to change between A Use Classes. Whilst this may be an option and clearly one that companies may look at, ultimately with a fast changing economic climate businesses are often under pressure to sell off unviable businesses. If there is no demand for businesses within the A Use Class then it may be the case that there is no option but to change to another use by applying for planning permission.	Concern noted. In that case, the pub owner/operator would need to apply for planning permission and comply with the terms of the IPPG. The IPPG incorporates flexibility for redevelopment if the criteria are met.	No further action.
18601 - Januarys	Object	-Paragraph 2.4 focuses on a very narrowly defined use of one part of the NPPF, and interprets and adapts sections in an equally brief and insubstantial way. -The blanket protection of PHs (as opposed to only valued facilities) does not reflect the key requirement of the NPPF and therefore is not addressed properly by the IPPG.	Concerns noted. The IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti development and that there is the flexibility to allow development where it would be in the interests of the economy or community. The Planning Policy Context section includes a number of paragraphs which explain how the IPPG works with the NPPF.	Amend the Planning Policy Context section to explain further how the IPPG works with the NPPF.
8122 - Januarys	Object	-Paragraph 2.3 overstates Cambridge's dependency on public houses to attract the students, academics, young workers and tourists that its economy and future growth depend upon. The statement is not based on verifiable evidence, and is symptomatic of the lack of balance within the document.	Concerns noted. The sentence "Without its pubs, Cambridge will not be able to attract the students, academics, young workers and tourists that its economy and future growth depend upon." will be amended to read "Cambridge's pubs contribute strongly to attracting students, academics, young workers and tourists that its economy and future growth depend upon."	Amend third sentence of 2.4 to read: "Cambridge's pubs contribute strongly to attracting students, academics, young workers and tourists that its economy and future growth depend upon."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14687 - British Beer & Pub Association	Object	<p>Further planning restrictions on change of use are counterproductive and go against the spirit of the NPPF that seeks to reduce red tape and delays around planning to allow business to more easily adapt to changing markets.</p> <p>The consultation quotes the LDF in stating that 'planning should readily adapt to changing circumstance' a sentiment expressed throughout the NPPF.</p> <p>The policy to 'resist the loss of Public Houses and other Drinking Establishments' is the opposite of this with pubs having to adapt to changing consumer habits away from pub going and planning restrictions supporting their viability and success in this situation.</p>	<p>Concern noted. The IPPG is adapting to changing circumstances, the issue of loss of public houses has arisen since the adoption of the Local Plan 2006 and is a change in the circumstances facing the Council. Sufficient flexibility remains in terms of the ability to change use within the A use class, and redevelopment of public houses is still permissible if the criteria in the IPPG are met.</p>	No further action.
14691 - British Beer & Pub Association	Object	<p>Whilst we support the Council's comments about the value of pubs to the local economy and community, we do not believe that the proposals contained in this consultation are appropriate, and we question their legality.</p>	<p>Concerns noted. The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public House Study will be incorporated into the Local Plan Review as it progresses.</p>	Incorporate the IPPG and the findings of the Cambridge Public House Study into the Local Plan Review process.
13087 - Caldecotte Consultants	Object	<p>Para 2.7 &amp; 2.8 - The need to support business is made clear by these paragraphs, however, the requirements for a change of use is over burdensome, where supply and demand, and access to alternatives, is not fully considered.</p>	<p>Concerns noted. The paragraphs in the Planning Policy Context section have been updated to further reinforce the NPPF's contribution. The Council does not consider the approach to be overly burdensome, having taken into account the needs of economy balanced against the local community.</p>	Update the paragraphs in the Planning Policy Context section to reinforce the NPPF's contribution on these issues.
14779	Object	<p>There have been several significant appeal judgements (The Plough at Shepreth, The Unicorn, The Carpenters Arms) which need to be incorporated into the approved IPPG and any new Local Plan policy.</p>	<p>Concerns noted. The IPPG has been amended at new paragraph 2.16 and new paragraph 4.9 to make reference to appeal decisions affecting public houses in and around Cambridge.</p>	Amend IPPG at new paragraphs 2.16 and 4.9 to make reference to appeal decisions affecting public houses in and around Cambridge.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8101 - Januarys	Object	We question whether in a tightly constrained city, it is sound to impose a protective policy on a single issue basis without regard to the implications for other necessary development. the IPPG conflicts with the NPPF, which makes clear that the document should be read as a whole, and those development proposals that accord with the development plan must be approved without delay.	<p>Concerns noted. However, it is considered that the IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti-development and that there is the flexibility to allow development where it would be in the interests of the economy or community.</p> <p>The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public House Study will be incorporated into the Local Plan Review as it progresses.</p>	Amend the Planning Policy Context section to provide further information on how the IPPG works with the NPPF.
12807	Support	While the national planning framework is good for pubs, it is important to get this carried forward into the local plan	Support noted. The Cambridge Local Plan Towards 2031: Issues and Options considers a number of options pertaining to the protection of public houses. Consideration of consultation responses to the Issues and Options report is underway.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Need for the IPPG</i>				
14699 - Januarys Consultant Surveyors	Object	<p>There is not considered to be any justification for a current, single issue policy review outwith the Local Plan Review process. The IPPG does not look at the issues surrounding public houses in a balanced manner, and does not consider other implications of this policy.</p> <p>The IPPG is premature, not founded on a reasonable evidence base, and should not be progressed outwith the Local Plan Review.</p>	<p>Concerns noted. The IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti development and that there is the flexibility to allow development where it would be in the interests of the economy or community.</p> <p>The Planning Policy Context section includes a number of paragraphs which explain how the IPPG works with the NPPF. The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public Houses Study will be incorporated into the Local Plan Review as it progresses.</p>	<p>Amend the Planning Policy Context section to explain further how the IPPG works with the NPPF.</p> <p>Incorporate the IPPG and the findings of its supporting Cambridge Public Houses Study into the Local Plan Review as it progresses.</p>
7296	Object	<p>The IPPG is a scandalous waste of our money.</p> <p>If pubs produce a reasonable profit they will probably stay open otherwise they will close.</p> <p>The council cannot make a pub stay open if the brewery and /or owner decides otherwise.</p> <p>What is better an eyesore of an empty building (and there are many disused pubs to illustrate this for example the Greyhound, Coldham's Lane) or a couple of houses/small block of flats.</p> <p>Social life is changing. Pubs have always closed over the years. Get spending our money on something important in these hard times and not on things like this!</p>	<p>Concerns noted. However, the Council is delivering this IPPG in recognition of community concerns over the loss of public houses. The Greyhound Public House has recently been the subject of an application 12/0255/FUL for the demolition of the building and replacement with a building to provide two commercial units in B1/B2/B8 Use, including trade counters. The Greyhound Public House has been closed from some time, and is situated on the edge of an industrial area and a residential area, with Coldhams Lane separating the two. The Public House sits on the industrial side of Coldhams Lane, with the busy road segregating the Public House from the residential area. Due to its positioning, the Public House was not considered part of the community, and was not therefore considered to be a valued facility, which met the community's day-to-day needs.</p>	No further action.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
18604 - Januarys	Object	Rather than focussing on the number of pubs lost in recent years, it might be more useful to focus on the impact of those losses. If the majority of the pubs closed were not of any significance to the local community but the new use has clearly created a more needed use why is this not analysed in the report as surely this is the whole issue?	Concerns noted. However, whilst it is difficult to measure the impact of the loss of the pubs already lost to other uses retrospectively, the Council has responded to the changing economic climate affecting public houses and the increased level of interest from residents and local interest groups by commissioning the Cambridge Public House Study and producing the IPPG to help safeguard the remaining public houses in the city. Where it is proven that the criteria in the IPPG have been used to market a public house without success for the relevant time period, there remains scope for redevelopment of public houses. Furthermore, several appeal decisions (e.g. paragraphs 5.67 - 5.109 of the Cambridge Public House Study) consulted during the research stage indicated that Inspectors were considering both how a pub had been operated and whether it had made any attempt to diversify or supplement the pub operation.	No further action.
14694 - British Beer & Pub Association	Object	We do not believe that the Council are able to make generalisations about what model of pubs is most successful e.g. offering a wide range of real ales. It is impossible to speculate whether or not the pubs that have closed in Cambridge would have survived with a different offer or business model. It is beyond the remit of the Council to speculate in this manner or seek to prescribe what pubs should do in order to attract business and remain viable.	Concern noted. The Council is not seeking to prescribe what should be done in order to remain viable. The Council is concerned that where a valuable public house could be lost, all efforts are made to maintain this business as a viable, ongoing proposition, for the benefit of the community and the business. Several appeal decisions (e.g. paragraphs 5.67-5.109 of the Cambridge Public House Study) consulted during the research stage indicated that Inspectors were considering both how a pub had been operated and whether it had made any attempt to diversify or supplement the pub operation.	No further action.
6950	Object	There is no longer a viable market for local pubs hence why so many are now closed. People can either not afford, or simply choose not to spend their money in pubs. There are plenty of pubs and bars in/around the city centre for people to go to if they wish. Local people would rather have more available housing, currently it is very difficult to find a house to buy in Cambridge because of the shortfall. Some local pubs have been a great source of concern to local residents because of noise and antisocial behaviour.	Concern noted. It is noted that there are a number of factors which may have contributed to the decline in public houses, including competition from supermarket discounting of alcohol; changes to people's drinking habits; the smoking ban in public areas; and pressures to realise higher value housing development. Whilst acknowledging the need for housing in Cambridge, this needs to be balanced with retaining and creating facilities for the local community, including public houses.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7151	Support	Clear requirement to preserve an appropriate number of pubs - several areas of cambridge are already very poorly served.	Support noted.	No further action.
12833	Support	It has been too easy for pubs to change from pubs to restaurants, to failed restaurants, to redevelopments. This needs to be stopped as pubs can be the saviour of our high streets. The success of a pub in Cambridge is usually dependent on the landlord. Where there is the will to make a pub successful in Cambridge, it generally succeeds.	Support noted.	No further action.
6880	Support	I am relieved that the City Council finally realises there is a problem and is finally taking action. I generally support any measures taken to prevent more pub closures, especially with an increasing population, so that the remaining ones, especially the good ones, become so busy that it is difficult to reliably visit them with a group of friends as they are too crowded.	Support noted.	No further action.
14082	Support	Strongly support the need for this IPPG - pubs weren't in danger in the 2006 local plan, and thus not included, because of that reason, rather than because pubs were not valued. With the recent number of pub closures and applications for development, particularly in cambridge where development land is at a premium, this IPPG is both necessary and welcome.	Support noted.	No further action.
10138	Support	I would like to express my support for, and agreement with the need for and goals of the IPPG.	Support noted.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3. The Importance of the Public House</b>				
<b>3. The Importance of the Public House</b>				
14700 - Januarys Consultant Surveyors	Object	The IPPG presumes that all pubs (and former pubs) are valued facilities. The evidence base in the form of the GVA Grimley study provides no indication of community value.	Concerns noted. However, both the GVA Cambridge Public House Study and the IPPG discuss the value of public houses at length.	No further action.
14813 - Charles Wells Ltd	Object	Although the NPPF classifies pubs as a community facility, it fails to recognise that this community function is dependent on the existence of a viable commercial enterprise. Social networks, including families, have become looser and less geographically concentrated. New Internet based social networks are likely to promote these trends. The days when pubs act as a focus for geographically defined local communities are largely over. Pubs do not provide as many jobs as suggested, and are therefore not a significant part of the local economy. Demands of local groups are volatile.	Concerns noted. The IPPG does recognise that the community function of public houses is dependent on the commercial viability of the premises. The criteria for judging losses of public houses are associated with the ongoing viability of the public house as well as the value it provides to the community.  Public houses continue to provide community facility functions and through our research, have concluded that pubs remain an important part of the social fabric of an urban area.  The IPPG sets out how public houses help contribute to the local and wider economy. These contributions are significant although difficult to quantify, especially the indirect contributions. One further example of evidence for this is the recommendation of the Cambridge Cluster at 50 study that shared social spaces are important to the success of employment areas.	No further action.
7256	Object	The document appears to list pros but no cons. This gives an unbalanced view as to the benefit of a pub to the community. For example, one of the reasons people stopped going to the Penny Ferry was the number of disturbances. Another reason, was for me, the deteriorating state of the grounds, overgrown trees which cut off any warm or light outside. Another is the detrimental effect that alcohol has on certain individuals. Pubs are not designed as community centres. Places such as school, sports or church halls can make better meeting places. Please list negatives in order to balance the discussion.	Concerns noted. The Council accepts that there are negative aspects to pubs. However, it is not the pub use itself which is detrimental to an area. Some of the problems described can be overcome by a change to the management/owner.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7035 - Friends of Midsummer Common	Object	No mention is made of opening hours of individual pubs. Personal experience tells me which pubs are better for networking and meetings without having to remember their specific opening hours.	Concerns noted. It would be too cumbersome to go into the level of detail in the IPPG associated with analysing different opening hours. As opening hours may be subject to change in the future, this information would also be likely to be rendered obsolete quite swiftly.	No further action.
13091 - Caldecotte Consultants	Object	The importance of a public house is fully recognised but the statistics in this paragraph are unhelpful, unfounded, and unreliable. Further clarification is needed from a more impartial source.	Concerns noted. However, the Council has referred to both the IPPR's Pubs and Places report (2nd Edition) and CAMRA research as both provide a range of information on the value of public houses. It is recognised that this are not the only sources of information available, but they do represent important sources of research.	No further action.
7034 - Friends of Midsummer Common	Object	It should be recognised that pubs are not just "culturally important institutions". Many are also "historically and architecturally important institutions". Redevelopment might destroy these attributes.	Concern noted. References will be made in the IPPG to the contribution pubs play to the historic character of Cambridge. The new paragraph 3.5 will read "Furthermore, the network of existing public houses makes a positive contribution to the historic character and appearance of the city. This is particularly the case for those pubs in the town centre or along the riverside. Along the River Cam, pubs help to retain and enhance the quality of the river's setting and appearance. Often older public houses are located in and contribute to the character of Conservation Areas or are considered to be of sufficient architectural or historic merit to warrant listed buildings protection. Some public houses not benefiting from national listed building protection are designated as Buildings of Local Interest (BLI). Fourteen public houses in Cambridge benefit from national listing. A further ten are included within the BLI list. The list of pubs at Section 5 is annotated with either LB or BLI to show which ones benefit from this additional protection. The presence of public houses in a city help to enable local people and visitors alike to enjoy the City's character, including its history."	Insert new paragraph 3.5 to read "Furthermore, the network of existing public houses makes a positive contribution to the historic character and appearance of the city. This is particularly the case for those pubs in the town centre or along the riverside. Along the River Cam, pubs help to retain and enhance the quality of the river's setting and appearance. Often older public houses are located in and contribute to the character of Conservation Areas or are considered to be of sufficient architectural or historic merit to warrant listed buildings protection. Some public houses not benefiting from national listed building protection are designated as Buildings of Local Interest (BLI). Fourteen public houses in Cambridge benefit from national listing. A further ten are included within the BLI list. The list of pubs at Section 5 is annotated with either LB or BLI to show which ones benefit from this additional protection. The presence of public houses in a city help to enable local people and visitors alike to enjoy the City's character, including its history."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14684 - British Beer & Pub Association	Object	<p>Recognition of the value public houses provide including economic contribution, job provision, social function as community hubs and enhancing the diversity and character of areas.</p> <p>Need to recognise that pubs are still businesses and must remain viable to survive.</p> <p>Attempts to resist change of use or development of closed pubs will not prevent pubs failing if they are unviable, despite best efforts, some will inevitably still close.</p> <p>It is crucial that pub businesses and individuals can re-position or dispose of the pubs to reinvest in other sites in the area.</p>	Concerns noted. The IPPG recognises that pubs are businesses and need to remain viable in order to survive. The IPPG incorporates the flexibility for public houses to be redeveloped or change use, subject to certain criteria being met.	No further action.
9247	Support	<p>I would like to add my support to the growing interest in retaining the 'Flying Pig' Public House as it is. There seems to be no merit in the destruction and then re- building of an existing community asset, indeed a great loss of amenity to this pocket of Cambridge would occur.</p>	<p>Concerns noted. However, the Council approved a planning application 06/0552/FUL for redevelopment to provide mixed use scheme comprising 156 residential units (including 40% affordable housing); B1 office use; retail / food and drink (Classes A1; A3 and A4 uses, including retention of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively. As Phase 1 of this planning permission has been carried out, the planning permission remains extant. Whilst the building itself may not remain, this planning permission does safeguard the public house use.</p>	No further action.
7019	Support	<p>As a resident of Romsey I feel it is important to save this building. I support it being opened as a Real Ale pub with inspired food menu. It could offer facilities for the community, rooms for a small music/comedy venue. Romsey is growing with vibrance, many new families are moving into the area. What we need is a focal point. This could be the first step to re-invigorating an historic area. The benefits would be many.</p> <p>This developer has already destroyed one pub house locally "The Jubilee", should not be given a second opportunity.</p> <p>Be brave CCC, think of the glorious alternatives.</p>	Support noted.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
12834	Support	I agreed with these statements.	Support noted.	No further action.
14278 - English Heritage (East of England Region)	Support	English Heritage agrees with the Council that the network of existing public houses make a positive contribution to the character and appearance of the city and are important in promoting social cohesion and as venues for social recreation and leisure. We therefore welcome the draft IPPG as a tool to ensure viable public houses are retained in the use for which they were intended.	Support noted. References will be made in the IPPG to the contribution pubs play to the historic character of Cambridge. The new paragraph 3.5 will read "Furthermore, the network of existing public houses makes a positive contribution to the historic character and appearance of the city. This is particularly the case for those pubs in the town centre or along the riverside. Along the River Cam, pubs help to retain and enhance the quality of the river's setting and appearance. Often older public houses are located in and contribute to the character of Conservation Areas or are considered to be of sufficient architectural or historic merit to warrant listed buildings protection. Some public houses not benefiting from national listed building protection are designated as Buildings of Local Interest (BLI). Fourteen public houses in Cambridge benefit from national listing. A further ten are included within the BLI list. The list of pubs at Section 5 is annotated with either LB or BLI to show which ones benefit from this additional protection. The presence of public houses in a city help to enable local people and visitors alike to enjoy the City's character, including its history."	Insert new paragraph 3.5 to read "Furthermore, the network of existing public houses makes a positive contribution to the historic character and appearance of the city. This is particularly the case for those pubs in the town centre or along the riverside. Along the River Cam, pubs help to retain and enhance the quality of the river's setting and appearance. Often older public houses are located in and contribute to the character of Conservation Areas or are considered to be of sufficient architectural or historic merit to warrant listed buildings protection. Some public houses not benefiting from national listed building protection are designated as Buildings of Local Interest (BLI). Fourteen public houses in Cambridge benefit from national listing. A further ten are included within the BLI list. The list of pubs at Section 5 is annotated with either LB or BLI to show which ones benefit from this additional protection. The presence of public houses in a city help to enable local people and visitors alike to enjoy the City's character, including its history."
7302	Support	The Flying Pig has always been an excellent public house which supplies reasonably priced food. I've been a regular for many years and would miss its unique atmosphere if it was to be demolished. It's safe to say that should this public house be lost then it would be a sad day for this part of Cambridge. These types of establishments only develop over many years and once its lost, it cannot be replaced. Please save the Flying Pig.	Concerns noted. However, the Council approved a planning application 06/0552/FUL for redevelopment to provide a mixed use scheme comprising 156 residential units (including 40% affordable housing); B1 office use; retail / food and drink (Classes A1; A3 and A4 uses, including retention of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively. As Phase 1 of this planning permission has been carried out, the planning permission remains extant. Whilst the building itself may not remain, this planning permission does safeguard the public house use.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7149	Support	The Flying Pig is a cultural and social hub. It is a successful business. It has a critical role in the community. It offers an important sense of scale in the architecture of the area. It provides an essential service to a very diverse customer base.	<p>Concerns noted. However, the Council approved a planning application 06/0552/FUL for redevelopment to provide a mixed use scheme comprising 156 residential units (including 40% affordable housing); B1 office use; retail / food and drink (Classes A1; A3 and A4 uses, including retention of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively. As Phase 1 of this planning permission has been carried out, the planning permission remains extant. Whilst the building itself may not remain, this planning permission does safeguard the public house use.</p> <p>While the loss of the public house may not have been an issue at the time of the planning decision, the loss of a pub or a potential pub is now a concern. Therefore, the IPPG should be applicable to any new planning application that involves the loss of a pub site (audited) despite it already having an alternative planning permission.</p>	No further action.
7195	Support	I agree with all of the points made in the document. I do not go to a pub that often, but they contribute to the atmosphere of an area, without which streets can become dreary housing estates. It is a valuable amenity in the city both for residents and visitors to have somewhere to go for a casual drink without having to go to a restaurant. Pubs are a very British institution and it would be a pity if they disappeared from everywhere except the historic centre.	Support noted.	No further action.
15356	Support	Public houses make an important contribution to social life in Cambridge.	Support noted.	No further action.

***Representations******Nature Summary of Main Issue******Council's Assessment******Action******4. Development Management Principles******4. Development Management Principles***

14285 - English Heritage (East of England Region)	Object	<p>With reference to the wording of the policy, it might be beneficial to consider adding a paragraph on deliberate neglect. Paragraph 130 of the NPPF considers the issue of deliberate neglect of heritage assets and that wording might be adapted for use respect of public house in the city. This might read:</p> <p>'Where there is evidence of deliberate neglect or damage to a public house the deteriorated state of the public house will not be taken into account in any decision concerning its future use or demolition.'</p>	<p>Concerns noted. A new paragraph 4.10 has been introduced to read "In cases where a planning application concerns a heritage asset (please refer to the glossary in section 6. for a definition) and there is evidence of deliberate neglect of or damage then the deteriorated state of the heritage asset will not be taken into account in any planning decision."</p>	<p>Introduce a new paragraph 4.10 to read "In cases where a planning application concerns a heritage asset (please refer to the glossary in section 6. for a definition) and there is evidence of deliberate neglect of or damage then the deteriorated state of the heritage asset will not be taken into account in any planning decision."</p>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8663 - Cambridge Past, Present and Future	Object	<p>No reference to applications for entirely new Public Houses.</p> <p>NPPF Paragraph 7 states that one of the NPPF's 'dimensions' is "a social role - supporting strong, vibrant and healthy communities...with accessible local services that reflect the community's needs and support its health, social and cultural well-being".</p> <p>Add a paragraph in section 4 that:</p> <p>-welcomes applications for new Public Houses in the City, particularly with outdoor areas, that promote these aims;</p> <p>-any new development must demonstrate how they will meet 'community needs', and support the resident's 'social and cultural well-being', by the provision of an accessible Public House(s).</p>	<p>Concerns noted. References to new public houses have been inserted at paragraph 2.17 (describing Saved Policy 5/12) and at paragraphs 4.15 - 4.18 (Proposals for new Public Houses (A4 uses)).</p>	<p>Insert new paragraph 2.17 to read:</p> <p>"In respect of new public houses, Saved Policy 5/12 "New Community Facilities" would apply. The NPPF states that a public house is a community facility and therefore new public houses would be determined against Saved Policy 5/12. Essentially, it is necessary to prove a local need in order to be in accordance with the Policy. However, it would also be necessary to adhere to other general design policies and have regard to normal environmental and amenity considerations."</p> <p>Insert new paragraphs 4.15 - 4.18 to read:</p> <p>"Proposals for new Public Houses (A4 uses)</p> <p>4.15 The current Local Plan is under review and should strategic sites for new housing development come forward in the next plan period, there could be opportunities to provide new public houses to satisfy local demand and help to create vibrant &amp; sustainable communities.</p> <p>4.16 Saved Policy 5/12 "New Community Facilities" encourages new community facilities. The NPPF at paragraph 70 confirms that planning policies should plan positively for community facilities including public houses, in order to secure sustainable communities.</p> <p>4.17 Accordingly, proposals for public houses will be encouraged to serve new residential communities of more than 3,000 new households; where the pub is co-located with other new commercial, retail &amp; community facilities including recreational and amenity open space; and, where the pub is centrally located on a prominent site with good visibility or on the main arterial transport route into and out of the new community.</p> <p>4.18 It would also be necessary to adhere to other general design policies and have regard to normal environmental and amenity considerations."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14817 - Charles Wells Ltd	Object	Public houses in the suburban estates are amongst the most marginal, the consequence of competition from off licence outlets, and with buildings and locations where it is difficult to adopt some of the successful niche business models. Without a viable commercial operation, these pubs cannot act as a community focus unless some substantial form of subsidy is available. Alternative criteria for marketing strategy need to be considered.	Concerns noted. However, a number of recent appeal decisions have supported the use of marketing to evidence viability. The Council has inserted a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the GVA Cambridge Public House Study Report."	Insert a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the GVA Cambridge Public House Study Report."
10153 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Cambridge & District CAMRA very much welcomes this initiative and applauds the Council for recognising the need to preserve the city's remaining pubs for future generations. However, we wish to see the policies strengthened so that any conversion of a public house to another use (including other A class uses) will require planning permission.	Concerns noted. The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The only way to achieve this would be make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7147	Object	There doesn't seem to be anything in the draft that addresses the case where an existing pub is to be demolished and replaced by a new pub as part of a wider redevelopment. The developer could argue that as the pub is not being 'lost' the IPPG is not relevant in this case. I would argue that the pub (eg Flying Pig) would be lost as the replacement pub would not have the same character etc. Could the council look into this and include this type of case in the IPPG and the resulting policy guidance applicable to it.	Concerns noted. While the loss of the public house may not have been an issue at the time of the planning decision, the loss of a pub or a potential pub is now a concern. Therefore, the IPPG should be applicable to any new planning application that involves the loss of a pub site (audited) despite it already having an alternative planning permission. Reference has been made in respect of new public house provision in paragraphs 4.15 - 4.18 in the amended IPPG following consultation. Whilst the character of a pub might change, it is important that a pub will remain on the site. Should the loss of character be considered significant then the Council would take that into account when determining the planning application.	<p>Insert new paragraphs 4.15 - 4.18 to read:</p> <p>"Proposals for new Public Houses (A4 uses)</p> <p>4.15 The current Local Plan is under review and should strategic sites for new housing development come forward in the next plan period, there could be opportunities to provide new public houses to satisfy local demand and help to create vibrant &amp; sustainable communities.</p> <p>4.16 Saved Policy 5/12 "New Community Facilities" encourages new community facilities. The NPPF at paragraph 70 confirms that planning policies should plan positively for community facilities including public houses, in order to secure sustainable communities.</p> <p>4.17 Accordingly, proposals for public houses will be encouraged to serve new residential communities of more than 3,000 new households; where the pub is co-located with other new commercial, retail &amp; community facilities including recreational and amenity open space; and, where the pub is centrally located on a prominent site with good visibility or on the main arterial transport route into and out of the new community.</p> <p>4.18 It would also be necessary to adhere to other general design policies and have regard to normal environmental and amenity considerations."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14816 - Charles Wells Ltd	Object	Protectionist development management policies could have perverse effects in encouraging the closure of commercially marginal or poorly located public houses. These policies need to be more flexible. Development management policies should be positively worded to support pub diversification including the provision of dining facilities, smoking shelters and accommodation rooms. Development management policies should encourage the provision of hospitality facilities, including pubs, restaurants, clubs and visitor accommodation within the city centre and edge of city clusters as identified in the Cambridge Public House Study.	<p>Concern noted. The Council disagrees that the IPPG will encourage commercially marginal or poorly located public houses to close. In the example given it is not clear why the public house would not close whether the IPPG was adopted or not, and hence how the IPPG is supposed to have encouraged the public house to close. The IPPG is sufficiently flexible, and if the criteria contained within it are met the redevelopment can occur.</p> <p>The IPPG is positively worded, diversification is encouraged through part (b) of paragraph 4.5.</p> <p>Following an audit of Cambridge's pubs (including some former pubs in use as restaurants), these have been assessed as meeting a local suburban community need, or a broader city wide and local community need within an important cluster of related pub types, or a city/village centre economic and tourist need. These are listed in Section 5 of this IPPG. These include public houses that are within the city centre and in suburban estates. The assessment recognises the different functions these public houses perform. The marketing strategy required by the IPPG is considered the least onerous strategy that is capable of demonstrating that a comprehensive exercise has been undertaken.</p>	No further action.
8805	Support	Principles cover the issues well	Support noted.	No further action.
15898	Support	Support in general for the proposals	Support noted.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Proposals affecting currently or last used as a Class A4 public house</i>				
14685 - British Beer & Pub Association	Object	Attempts to restrict change of use will cut across the 'Community Right to Bid' provisions in the Localism Act which are due to come in later this year, which gives communities the power to protect community pubs that in rare cases may be under threat of closure. However, it also ensures that there is genuine community support behind a pub as without it, in the long run, the pub will still close. The Council should wait until the Localism Act provisions come in as these should be the mechanism if any to protect local pubs that genuinely have local support.	Concern noted. If a moratorium is triggered, this doesn't stop the pub owner from marketing the pub, just from selling it, so they could continue to market the pub on the understanding that it was subject to moratorium. The purpose of the IPPG is to demonstrate the owner/developer has marketed it at a the price of a public house that other pub operators, or the community, can afford, rather than marketing it at residential values. If a another pub operator wants to buy the pub as a result of said marketing, then surely this saves the pub and should likely be supported by the community that triggered the right to buy? Delaying the marketing of the pub, at a pub price, to pub operators may simply prolong it's time out of pub use, leading to the loss of regular customers making it more difficult to reopen the pub. Waiting until the Localism Act provisions come in will mean further public houses are lost.	No further action.
14784	Object	Para 4.5 (c) Alternative provision is very weak. The argument used by the Council regarding the loss of the Penny Ferry/Pike and Eel listing the Green Dragon as alternative provision but not taking account of the wider loss in East Chesterton and that in fact loss of the Penny Ferry would mean the area was down to 1 pub for 7000 homes. Needs to be expanded to consider overall area provision and other pub losses (or gains) in the area over time (over the previous 10 year period) not just a tight circle round the pub itself.	Concerns noted. The Council accepts that this criterion as worded is unclear. However, the Council considers that the need to demonstrate that there is adequate provision available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius, is for the particular area within which the public house is located. How this would work in practice would be: <ol style="list-style-type: none"> <li>1. Identify a 400m buffer from the location of the proposed pub loss.</li> <li>2. Identify the number of working age adults within this buffer.</li> <li>3. Identify what alternative public houses there are within this buffer or nearby.</li> <li>4. Calculate how many public houses there are per working age adults.</li> </ol>	Simplify development criteria in paragraph 4.5; and amend annex C, Community Catchments and Consultation to clarify how it can be demonstrated that the local community no longer needs the public house or any alternative 'A' or 'D1' class use and its loss would not damage the availability of local commercial or community facilities that provide for day-to -day needs in the local area.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
18605 - Januarys	Object	What weight has been given to the other aspirations of the NPPF, such as encouraging better use of brownfield sites?	Concerns noted. The Council has produced the IPPG to address the loss of public houses and to set out criteria to be used in determining planning applications affecting public houses. Each planning application must still be determined on its own merits, with consideration given to the breadth of the NPPF.	No further action.
18602 - Januarys	Object	-Unclear about the requirement to provide one pub per 750 working age adults. No evidence to clarify whether this is the optimum ratio for Cambridge provided within the associated GVA Report, only a highly simplistic bench-marking exercise.	Concerns noted. The Council accepts that this criterion as worded is unclear. The need to demonstrate that there is adequate provision available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius, is for the particular area within which the public house is located. How this would work in practice would be:  1. Identify a 400m buffer from the location of the proposed pub loss. 2. Identify the number of working age adults within this buffer. 3. Identify what alternative public houses there are within this buffer or nearby. 4. Calculate how many public houses there are per working age adults.	Simplify development criteria in paragraph 4.5; and amend annex C, Community Catchments and Consultation to clarify how it can be demonstrated that the local community no longer needs the public house or any alternative 'A' or 'D1' class use and its loss would not damage the availability of local commercial or community facilities that provide for day-to-day needs in the local area.
14858 - Old Chesterton Residents' Association	Object	Para 4.5 (c) The alternative provision is very weak. This option fails to take account of the wider loss in East Chesterton, for example. So it needs to be expanded to consider overall area provision and other pub losses (or gains) in the area over time (say over the previous 10 year period) not just a tight circle round the pub itself.	Concerns noted. The Council accepts that this criterion as worded is unclear. The need to demonstrate that there is adequate provision available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius, is for the particular area within which the public house is located. How this would work in practice would be:  1. Identify a 400m buffer from the location of the proposed pub loss. 2. Identify the number of working age adults within this buffer. 3. Identify what alternative public houses there are within this buffer or nearby. 4. Calculate how many public houses there are per working age adults.	Simplify development criteria in paragraph 4.5; and amend annex C, Community Catchments and Consultation to clarify how it can be demonstrated that the local community no longer needs the public house or any alternative 'A' or 'D1' class use and its loss would not damage the availability of local commercial or community facilities that provide for day-to-day needs in the local area.

Proposals affecting currently or last used as a Class A4 public house

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14857 - Old Chesterton Residents' Association	Object	Para 4.5 (a) and (b) The approach taken in regard to acceptability of loss is almost solely a narrow market led viability approach favouring the applicants which is also contrary as well to the wider view on viability of recent appeals.	Concerns noted. The Council considers that the approach set out in 4.5 is already sufficiently strong. To enhance it further would be detrimental to the interests of business growth and flexibility in Cambridge. We have addressed the recent appeal decisions in the IPPG and the Cambridge Public Houses Study.	Insert a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the GVA Cambridge Public House Study Report."
10161 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Paragraph 4.5(c) We applaud the ambitions of this criterion and the suggested 400 metres walking distance seems about right. We are not clear, however, how this ties in with the "one pub per 750 working age adults". Does this refer to the city as a whole, or the particular area of the city in which the pub is located? - and, if the latter, how is the area defined and the "pub per 750" figure calculated?	Concerns noted. The Council accepts that this criterion as worded is unclear. The need to demonstrate that there is adequate provision available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius, is for the particular area within which the public house is located. How this would work in practice would be:  1. Identify a 400m buffer from the location of the proposed pub loss. 2. Identify the number of working age adults within this buffer. 3. Identify what alternative public houses there are within this buffer or nearby. 4. Calculate how many public houses there are per working age adults.	Simplify development criteria in paragraph 4.5; and amend annex C, Community Catchments and Consultation to clarify how it can be demonstrated that the local community no longer needs the public house or any alternative 'A' or 'D1' class use and its loss would not damage the availability of local commercial or community facilities that provide day-to-day needs in the local area.
13106 - Caldecotte Consultants	Object	Para 4.5(b) The 'diversification options' of a pub needs to be further clarified, including guidance for the type of evidence required to demonstrate diversification options tried.	Concerns noted. Any viability assessment submitted will, by its very nature, need to consider the location of the premises as this will impact directly upon the existing and future customer base, the overall offer of the pub, and the scope for diversification. Similarly, investment will have to have been considered in appraising different options for diversification. The Council does not consider it appropriate to provide more clarity on diversification options as they can vary considerably and the document cannot hope to cover all possible diversification options in detail.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8658 - Cambridge Past, Present and Future	Object	Point A: The specified 12 month period for marketing is inadequate. The Localism Act, under the 'Community Right to Bid', allows community organisations to nominate 'assets of community value' including Public Houses. If the owner of a listed asset then wants to sell then a six month moratorium period is triggered during which the asset cannot be sold. Any marketing period must start after the 6 month moratorium has elapsed. IPPG should clarify this. Merton Council Local Plan Policy L15 states that the marketing period should be 2 years. The marketing period should be increased to a minimum 18 months.	Concerns noted. However, if a moratorium is triggered, this does not stop the pub owner from marketing the pub, just from selling it, so they could continue to market the pub on the understanding that it was subject to a moratorium. The whole purpose of the guidance is to demonstrate that an owner/developer has marketed it at a pub price that other pub operators, or the community, can afford, rather than marketing it to residential developers. If a another pub operator wants to buy the pub as a result of said marketing, then surely this would save the pub and should likely be supported by the community that triggered the right to buy. Delaying the marketing of the pub, at a pub price, to pub operators may simply prolong its time out of pub use, leading to the loss of regular customers making it more difficult to reopen the pub.	No further action
10159 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Paragraph 4.5(a) We would prefer this to read "The pub has been marketed for a minimum of 12 months as a public house free of tie and restrictive covenant, at a price agreed with the Council following an independent professional valuation (paid for by the developer) and there has been no interest in either the free- or lease-hold as a public house". This would tie in more effectively with 4.6 and Annex A, where the marketing strategy is (rightly) primarily geared to selling for pub use.	Concerns noted. The Council notes the support for the 12 months marketing period. The Council makes reference to other A class uses due to the ability of the pub to change its use to A1, A2 or A3 without permission. Furthermore, it is necessary to refer to Class D1 as such uses also provide a community facility.  The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The Council could make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8125 - Januarys	Object	Marketing is not a way to test whether the facility is a 'valued' facility, which is a key consideration of the NPPF, or the benefits of alternative uses on the site. Its importance as a 'measure' of value is very much overstated. The requirement for marketing should only be applicable if it is accepted that a public house is valued from the outset. It should not be the starting point to any assessment.	Concerns noted. However, a number of recent appeal decisions have supported the use of marketing to evidence viability. The Council has inserted a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the Cambridge Public House Study Report." Furthermore, by pre-agreeing a focussed marketing strategy with Cambridge City Council, it would be possible to reduce the required marketing period. These early negotiations might also provide indications of the value of the public house to the community.	Insert a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the Cambridge Public House Study Report."
10156 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Of the 28 city pubs which have closed since 2002, 11 were converted to restaurants and these of course have considerably less of a community focus than the pubs they replaced. We feel, therefore, that the criteria, certainly so far as existing pubs are concerned, should seek to preserve pubs as pubs - the criteria as drafted appear to be relaxed about the prospect of them changing to other A class uses and D1 as well.	Concerns noted. The IPPG makes reference to other A class uses due to the ability of the pub to change its use to A1, A2 or A3 without permission. Furthermore, it is necessary to refer to Class D1 as such uses also provide a community facility.	No further action.
14859 - Old Chesterton Residents' Association	Object	Para 4.5 (d) We consider also that the development management principles needs to address the emphasis often stressed by developers on the need for housing in Cambridge and give greater guidance on how to balance that against the potential loss of community facilities. The reality in Cambridge is that land constraints mean housing need can never be fully addressed and it will always remain a very high need, so any criteria based assessment of acceptability of loss needs to address this balance between housing and social amenity value explicitly. Para 4.5 (d) does not do this and could be strengthened.	Concerns noted. Whilst recognising the need for housing in Cambridge, the IPPG sets out criteria for the assessment of planning applications affecting public houses in Cambridge. The consideration of any planning application will require a balanced approach to the merits of the particular application.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8136 - Januarys	Object	-No reference is made to Local Centres, which in the current Local Plan are specifically designated to meet local day-to-day needs (para 6.24 of the Local Plan 2006), whereas outside such zones it would be reasonable to afford a lower degree of protection. -Local Plans should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. This is in no way addressed within the IPPG.	Concerns noted. None of the existing retail policies in the Cambridge Local Plan 2006 are able to protect public houses whether in local centres or not. This is discussed in the Cambridge Public House Study Sections 5.17 to 5.25. Often it is those pubs outside of local centres that offer community benefit, but are more susceptible to development pressures particularly for residential development. The Council does not support the suggestion that pubs outside of local centres should have less protection.	No further action.
10160 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Paragraph 4.5(b) For the same reason, we would prefer the wording to read ".....retain the building or site for its existing A4 class use." Again, the viability test at Annex B is oriented towards pub use so the nexus between criterion and annex would be stronger.	Concern noted. We have to make reference to other A class uses due to the ability of the pub to change its use to A1, A2 or A3 without permission. Furthermore, it is necessary to refer to Class D1 as such uses also provide a community facility.	No further action.
10163 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Paragraph 4.5(d) Again, we would suggest deletion of "any alternative A or D1 class use"	Concerns noted. The Council makes reference to other A class uses due to the ability of the pub to change its use to A1, A2 or A3 without permission. Furthermore, it is necessary to refer to Class D1 as such uses also provide a community facility.  The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The only way to achieve this would be make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
13103 - Caldecotte Consultants	Object	<p>Para 4.5(a) A more proportionate approach would require less onerous criteria for proposals, for a change of use to public houses in an urban area, where there is a minimum number of alternative pubs in reasonable walking distance.</p>	<p>Concerns noted. However, the issue of alternate public house provision is to be dealt with in Annex C of the IPPG. The second main bullet in Annex C will be altered to read: "Developers are required to carry out an assessment of the needs of the local community for community facilities to show that the existing or former public house is no longer needed and whether alternative provision is available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius."</p>	<p>Alter the second main bullet in Annex C to read: "Developers are required to carry out an assessment of the needs of the local community for community facilities to show that the existing or former public house is no longer needed and whether alternative provision is available in the area to provide at least one pub per 750 working age adults within a 400m catchment radius."</p>
8138 - Januarys	Object	<p>-Criteria B and D goes well beyond the scope of the GVA pub study, in suggesting that viability should also be assessed in the context of alternative A Class and D1 uses. The IPPG has no remit to include policies which cut across the provisions of the Local Plan. No evidence base to support this approach. -Requiring every criterion to be satisfied provides a blanket approach to resisting redevelopment, without retaining sensible flexibility in the emerging policy. Norwich policy framework is less onerous. -Marketing may confirm a site's commercial interest, but when should an owner be forced to sell a site, and on what basis?</p>	<p>The IPPG makes reference to other A class uses due to the ability of the pub to change its use to A1, A2 or A3 without permission. Furthermore, it is necessary to refer to Class D1 as such uses also provide a community facility.</p> <p>The Council believes that the amended criteria represent a reasonable approach to addressing the loss of public houses in Cambridge.</p> <p>The owner is not forced to sell a site - they are only required to show that there is no market interest in the site as a public house or A1 - A3 or D1 uses. If there is a market interest, the IPPG does not and cannot require the owner to sell the public house.</p>	<p>No further action.</p>
14785	Object	<p>Para 4.5(d) Development control principles need to address the emphasis often stressed by developers on the need for housing in Cambridge and give greater guidance on how to balance that against the potential loss of community facilities. The reality in Cambridge is that land constraints mean housing need can never be fully addressed and it will always remain a very high need, so any criteria based assessment of acceptability of loss needs to address this balance between housing and social amenity value explicitly. 4.5 (d) does not do this and could be strengthened.</p>	<p>Concerns noted. Whilst recognising the need for housing in Cambridge, the IPPG sets out criteria for the assessment of planning applications affecting public houses in Cambridge. The consideration of any planning application will require a balanced approach to the merits of the particular application.</p>	<p>No further action.</p>

Proposals affecting currently or last used as a Class A4 public house

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14782	Object	Para 4.5 (a) and (b) The approach taken in regard to acceptability of loss is almost solely a narrow market led viability approach favouring the applicants which is also contrary as well to the wider view on viability of recent appeals.	Concerns noted. The Council considers that the approach set out in 4.5 is already sufficiently strong. To enhance it further would be detrimental to the interests of business growth and flexibility in Cambridge. We have addressed the recent appeal decisions in the IPPG and the Cambridge Public House Study.	Insert a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the GVA Cambridge Public House Study Report."
14696 - British Beer & Pub Association	Object	This requirement is not something that that is within the Council's remit. It is unacceptable to require businesses to provide this information and an unacceptable intrusion into private business.	Concern noted. Requirements for financial evidence in order to demonstrate viability of proposals are common for aiding decision taking in planning.	No further action.
14695 - British Beer & Pub Association	Object	We are extremely concerned about the criteria that the Council is seeking to put into place before allowing development or change of use. We believe the proposals are unlawful as there is no legal basis upon which the Council might develop such criteria which are, in effect, obstacles to development. It is our view that the Council is exceeding its powers under planning law as well as going against the spirit of the NPPF published only this year to free up business from unnecessary planning burdens and will be counterproductive in helping to keep pubs open.	Concerns noted. The IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti development and that there is the flexibility to allow development where it would be in the interests of the economy or community. The Planning Policy Context section includes a number of paragraphs which explain how the IPPG works with the NPPF.  The IPPG sets out in Section 1 the reasoning behind the approach taken to delivering the IPPG. The IPPG supplements saved policies in the Cambridge Local Plan 2006 and, once adopted, will constitute a material consideration in the determination of planning applications affecting public houses in Cambridge. It is intended that the IPPG and the findings of its supporting Cambridge Public House Study will be incorporated into the Local Plan Review as it progresses.	Amend the Planning Policy Context section to include a number of paragraphs which explain how the IPPG works with the NPPF.  Incorporate the IPPG and the findings of its supporting Cambridge Public House Study into the Local Plan Review as it progresses.

Proposals affecting currently or last used as a Class A4 public house

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
18603 - Januarys	Object	-No reference to the suitability of the public house use, and recognition that some have fundamental flaws on the basis of amenity issues or are more suitable for alternative uses, for which there may be a greater need.	Concerns noted. Where the public house has difficulties in terms of licensing, anti-social behaviour and/or noise, it is recognised that there would be implications for the ongoing trading of the public house. However, this may be due to poor management of the public house in question. Many public houses operate effectively within residential areas and serve their communities successfully. As such, no changes to the IPPG are suggested to deal with this issue.	No further action.
13161 - Caldecotte Consultants	Object	Consultation on the proposed marketing strategy and asking prices would be over burdensome. It is suggested that liaison with the local authority should be sufficient where, if the authority deem appropriate, may consider consulting the community in exceptional circumstances.	Concerns noted. However, a number of recent appeal decisions have supported the use of marketing to evidence viability. The Council has inserted a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the Cambridge Public House Study Report." Furthermore, by pre-agreeing a focussed marketing strategy with Cambridge City Council, it would be possible to reduce the required marketing period. These early negotiations might also provide indications of the value of the public house to the community.	Insert a new paragraph 4.9 of the IPPG to read "In preparing the IPPG, a number of appeal decisions dealing with the need for marketing were considered. These are set out in the Cambridge Public House Study Report."
18606 - Januarys	Object	Adopting a "freeze" on all public houses may dilute the offer of better performing pubs - is it not better to have one good performing pub in a neighbourhood than two poorly performing pubs?	Concerns noted. However, the poorly performing public houses should still be allowed the opportunity to be marketed effectively prior to site disposal. It may be a result of poor management of the public house in question, which might be turned around by another operator and/or through diversification of the offer of the public house.	No further action.

Proposals affecting currently or last used as a Class A4 public house

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
13102 - Caldecotte Consultants	Object	<p>Para 4.5(a) If required, a 6 month marketing exercise is more proportionate. The proposed 12 month timeframe is unjustified and not compliant with the Government's own legislation allowing communities sufficient time to bid for community facilities. The Government recognises a total 6 month period will afford local community groups sufficient time to bid to take over registered 'assets of community value' which can include public houses. A more flexible and reasoned approach to the marketing period required may be a fairer reflection of economic circumstances, with six months an appropriate duration.</p>	Concerns noted. The Council considers that 12 months is a reasonable period for marketing a public house. This is still a shorter timeframe than that required by the London Borough of Merton.	No further action.
8130 - Januarys 13126 - Caldecotte Consultants	Object	<p>The requirement for alternative pubs to be within a 'reasonable walking distance' of 400m as per the Urban Design Compendium is not justified (to demonstrate a lower catchment for Cambridge) and is contrary to Government Policy which defines a reasonable walking distance at 800m, see Section 4.4 of the Manual for Streets (2007 as amended).  The Manual for Streets guidance is more relevant as it refers to access to facilities as oppose to just open space, and is also more recent guidance.  A 800m walking distance is 'reasonable' and justifiable, according to more recent and impartial research.</p>	<p>Concerns noted. 400m is a reasonable walking distance. Sources for this distance can be found in:</p> <p>(1) Urban Design Compendium Part I, Building Walkable Neighbourhoods, Section 3.2.1 (2) Sustainable Settlements: A Guide for Planners, Designers and Developers Sustainable Communities: The Potential for Eco-Neighbourhoods by Barton cites, Figure 6.2 - Possible Standards for Accessibility to Local Facilities' (3) National Playing Fields Association Standards for play provision; criteria for Local Equipped Area of Play.</p> <p>The Council accepts that this is potentially confusing as worded and included in paragraph 4.5.</p>	Simplify development criteria in paragraph 4.5; and amend annex C, Community Catchments and Consultation to clarify how it can be demonstrated that the local community no longer needs the public house or any alternative 'A' or 'D1' class use and its loss would not damage the availability of local commercial or community facilities that provide day-to-day needs in the local area.
6944	Support	There is a need to preserve existing pubs wherever possible. It is important that opinions as to continued viability are supported by truly independent evidence.	Support noted.	No further action.
8164	Support	Comprehensive; good detailing of how pubs benefit community and of how to check those benefits aren't being lost; good failsafes and checks to prevent inappropriate development of valued pubs.	Support noted.	No further action.
8806	Support	criteria seem reasonable	Support noted.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
6878	Support	Para 4.5a - I am pleased to see that the statement "free of tie or restrictive covenant" is included. Most pubs "fail" owing to onerous charges on behalf of the brewery that owns the freehold, or that the brewery imposes an incompetent landlord on the pub. The same pub, when free of tie, and run by a competent team, can often suddenly become a profitable success. One might interpret this as the brewery hoping the pub will fail, indeed setting the conditions so guaranteed to fail, so it can sell off the land for profitable housing.	Support noted.	No further action.
7359	Support	I am very concerned about possible development on the site of our local pub, the Flying Pig, and hope this proposal will prevent such development taking place.	Concerns noted. However, the Council approved a planning application 06/0552/FUL for redevelopment to provide a mixed use scheme comprising 156 residential units (including 40% affordable housing); B1 office use; retail / food and drink (Classes A1; A3 and A4 uses, including retention of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively. As Phase 1 of this planning permission has been carried out, the planning permission remains extant. Whilst the building itself may not remain, this planning permission does safeguard the public house use.	No further action.
12866	Support	It is important that pubs be given a chance to revert to pubs if there is the demand by the local community for it.	Support noted.	No further action.
14069	Support	I strongly support this proposal. When developers purchase pub sites, they do not do so with the aim of running a good pub in mind, and adopt the attitude that pubs are on the decline due to the smoking ban/ supermarket prices etc. It is clear, however, from walking into any well-run pub in Cambridge, that pubs are extremely popular and important community meeting places when they are well-managed. This policy will protect against the developers' (naturally biased) arguments against pubs and allow sites to have a chance to be run as a pub again.	Support noted.	No further action.

Proposals affecting other Class A uses which were previously in a Class A4 pub use

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Proposals affecting other Class A uses which were previously in a Class A4 pub use</i>				
8660 - Cambridge Past, Present and Future	Object	We would also ask that consideration be given to Public Houses left closed for longer than 18 months being re-opened through enforcement notices under the Local Plan, or be the subject of an Article 4 Direction(NPPF Para.200), to prevent the 'unnecessary loss' of a 'local amenity'.	Concerns noted. However, the Council does not consider it tenable to use enforcement powers to reopen closed public houses. In terms of using Article 4 directions to remove permitted development rights, putting such powers in place would require a separate legal process to that of the IPPG, with consequent resource implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.
8165	Object	The other Class A uses seem to me to differ greatly from the functions pubs perform. I would think that a conversion in this category would still lead to the full effects of the loss of a valued pub, and think it would be better to use the same stringent criteria for proving redevelopment is appropriate here as elsewhere.	The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The only way to achieve this would be make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.
6949	Object	Would it be possible to have A4 as a default use class for public houses when a change of uses occurs. This may prevent situations like on Kings Street where a former public house was unable to reopen (albeit after some considerable time). It would also make it clear to local residents that a change of use back to A4 may occur in the future and that they should not assume the current use was permanent.	Concerns noted. However, public houses are considered to fall within A4 use class within the Use Classes Order. As such, if someone sought to return a former pub site to use as a public house when the use of the land had already changed, planning permission would be required for the change of use back to a public house.	No further action.
10165 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	We strongly support the proposal to bring former pubs within the ambit of the policy. We do not, however, agree that the flexibility allowed by the national permitted development rules is beneficial. Of the eleven pubs which have converted to restaurants since 2007, none have returned to pub use - it is very much one-way traffic. We accept that the proposals would make it easier to change from A1/2/3 back to A4 but we consider that such changes would be better prevented in the first place.	The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The only way to achieve this would be make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.



Proposals affecting other Class A uses which were previously in a Class A4 pub use

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
14701 - January's Consultant Surveyors	Object	It is inappropriate for the IPPG to equally seek to apply to former pubs, when these may not have been in pub use for a very considerable period of time.	Under the Use Classes Order, public houses and other A4 uses can change to higher order use class (A3, A2 or A1) without needing planning permission. Taking the case of a restaurant in a former public house building, if the public house already served food, it may already have a kitchen with extractor fans. Over time it may be permissible for the pub to turn into a restaurant without formally requiring planning consent. It is therefore difficult to determine when a public house changed into a restaurant, unless some form of audit took place or specific planning permission was granted, indicating a different use was now in operation. Anecdotal evidence may suggest when the change took place, but this could not be relied upon to confirm the date of conversion. It is therefore difficult to establish when a public house ceased being a public house and change use legitimately into a different use without planning permission. As such, it would therefore seem reasonable to only apply the proposed guidance to future planning applications for those public houses audited and on the safeguarding list. This issue is covered in new paragraph 2.2 of the IPPG which reads "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."	Insert new paragraph 2.2 to read "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."
14786	Object	Para 4.9 - 4.13. Recent greater relaxation of permitted development rights by central government mean that loss of buildings from A1/A2 class use for residential C3 purposes is easier. How can this be addressed though the development control guidance here?	Concerns noted. The Council assumes that reference to the change to permitted development rights concerns the ability to provide two rather than one flat above an A1 or A2 premises. This is not relevant to the IPPG as the A1 or A2 use (which may have been previously in use as a pub) would remain.	No further action.

Proposals affecting other Class A uses which were previously in a Class A4 pub use

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
10177 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Use LPA powers to make Article 4 Directions to remove permitted development rights. Council could make a Direction which requires planning consent to be obtained for any change of use away from A4 (and, indeed, to demolish a pub not in a listed building or conservation area). Councils are reluctant to use Article 4 Directions because of the potential liability to pay compensation to owners affected by a Direction. The Town and Country Planning (Development)(England) Regulations allow LPAs to avoid compensation risks by giving 12 months notice of a Direction coming into force. -York and Manchester have made Directions.	The IPPG seeks to protect public houses by requiring a set of criteria to be met, prior to any public house being subject to change of use or redevelopment. The only way to achieve this would be make an Article 4 direction to remove permitted development rights in respect of changing from use class A4 to A3, A2 or A1. Putting Article 4 directions in place requires a separate legal process to that of the IPPG, with consequent resources implications. The Council will consider the potential to introduce Article 4 directions to protect public houses.	The Council will consider the potential to introduce Article 4 directions to protect public houses.
8661 - Cambridge Past, Present and Future	Object	That 'development management principles' should be 'Development Management Principles' in order that it's clear it refers to the specific provisions in section 4.	Concerns noted. The final section of paragraph 4.14 will be amended to read "Any proposals to convert or redevelop a former public house (as listed in Section 5 of this IPPG) since converted to a different 'A' use to a non-A use, will still be subject to the above Development Management Principles."	Amend the final section of paragraph 4.14 to read "Any proposals to convert or redevelop a former public house (as listed in Section 5 of this IPPG) since converted to a different 'A' use to a non-A use, will still be subject to the above Development Management Principles."
14860 - Old Chesterton Residents' Association	Object	Para 4.9 - 4.13 Recent (confirmed in July as coming into force from Oct 12) relaxation of permitted development rights by central government mean that loss of buildings from A1/A2 class use for residential C3 purposes is easier. How can this be addressed though the development control guidance here?	Concerns noted. The Council assumes that reference to the change to permitted development rights concerns the ability to provide two rather than one flat above an A1 or A2 premises. This is not relevant to the IPPG as the A1 or A2 use (which may have been previously in use as a pub) would remain.	No further action.
14072	Support	This appears to be a loophole in the planning law which developers exploit in order to get round the increasing amount of legislation to protect pubs, thus is a necessary policy.	Support noted.	No further action.
12871	Support	Pubs need to be able to move into and out of restaurant use. However change to housing removes this option and this must be subject to strict planning requirements.	Concerns noted. Unfortunately, the Use Classes Order does not allow site to revert back to their previous use as a public house. Planning permission would be required for this process.	No further action.

Proposals affecting other Class A uses which were previously in a Class A4 pub use

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
6879	Support	The ability to reinstate premises that were formerly pubs, which have been under some other use, as pubs, is essential. Under new management, what was formerly a failure, may be a success, and this should be encouraged.	Support noted.	No further action.
8807	Support	agree proposals	Support noted.	No further action.
6945	Support	Flexibility to allow reversion to pub use is highly desirable, in the right economic conditions.	Support noted.	No further action.

**Representations****Nature Summary of Main Issue****Council's Assessment****Action****5. List of Safeguarded Existing and Former Pub Sites****5. List of Safeguarded Existing and Former Pub Sites**

10216 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Include Fleur (de Lys) on 'Important Local Community Facility' list because the planning consent for residential use has not yet been implemented. If the plans fall through, we would like the possibility of it returning as a pub to be safeguarded.	Concerns noted. While the loss of the public house may not have been an issue at the time of the planning decision, the loss of a pub or a potential pub is now a concern. Therefore, the IPPG should be applicable to any new planning application that involves the loss of a pub site (audited) despite it already having an alternative planning permission. The Fleur de Lys is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.	Include the Fleur de Lys in the list of Safeguarded Pubs at Section 5 of the IPPG.
15902	Object	<p>Concern for, and confused about the fate of the Flying Pig. Public commentary (Cambridge evening news, 2008 onward and protection of public houses consultation 2012) suggest proposal is contrary to the literal and commonly understood meaning of the word 'retention'.</p> <p>The Flying Pig is a successful egalitarian pub; the atmosphere is not simply a result of the broad spectrum of people who drink there. The fabric of the building and those who use it are intimately intertwined. Patently absurd to suggest that a similar relationship could be contrived in a redeveloped building. Why not value its authenticity and originality?</p>	Concerns noted. However, the Council approved a planning application 06/0552/FUL for redevelopment to provide a mixed use scheme comprising 156 residential units (including 40% affordable housing); B1 office use; retail / food and drink (Classes A1; A3 and A4 uses, including retention of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively. As Phase 1 of this planning permission has been carried out, the planning permission remains extant. Whilst the building itself may not remain, this planning permission does safeguard the public house use.	No further action.
11973 - Cambridge Past, Present and Future	Object	<p>We would also concur with the supplied list of Pubs missing from the list, detailed by CAMRA in their submission.</p> <p>4 existing pubs (the Bird, Wrestlers, Clarendon Arms and Man on the Moon) omitted and need to be added in.</p> <p>Add Bird and Clarendon to 'Edge of City Cluster' list Wrestlers and Man on the Moon to 'Important Local Community Facility' list.</p>	Concerns noted. The Bird in Hand, Clarendon Arms and The Man on the Moon have been included within the edge of city cluster category on the List of Safeguarded Existing and Former Pub sites. The Wrestlers has been included as a Community Suburban Pub on the List of Safeguarded Existing and Former Pub sites.	Include The Bird in Hand, Clarendon Arms and The Man on the Moon within the edge of city cluster category on the List of Safeguarded Existing and Former Pub sites. Include The Wrestlers as a Community Suburban Pub on the List of Safeguarded Existing and Former Pub sites.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
11982 - Cambridge Past, Present and Future	Object	We would also concur with the supplied list of Pubs missing from the list, detailed by CAMRA in their submission. Include Fleur (de Lys) on 'Important Local Community Facility' list because the planning consent for residential use has not yet been implemented. If the plans fall through, we would like the possibility of it returning as a pub to be safeguarded.	Concerns noted. While the loss of the public house may not have been an issue at the time of the planning decision, the loss of a pub or a potential pub is now a concern. Therefore, the IPPG should be applicable to any new planning application that involves the loss of a pub site (audited) despite it already having an alternative planning permission. The Fleur de Lys is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.	Include the Fleur de Lys in the list of Safeguarded Pubs at Section 5 of the IPPG.
14822 - Charles Wells Ltd	Object	In spite of the NPPF's statements on public houses as a local community resource, development management policies should recognise the reality that face many pubs in relatively isolated locations on suburban estates. Local initiatives could provide a future for some of these pubs as community pubs. However, it should be recognised that there are suburban pubs that are not commercially viable, are not respected or used by the local community, and whose closure and development for other uses would be regarded locally as beneficial. Development management policies should not seek to protect such pubs.	Concerns noted. The current categories better reflect the significance of the public houses than the categories proposed. The Council recognises that some suburban public houses may struggle with viability, the IPPG retains flexibility to allow redevelopment of sites where the proposed criteria are met.	No further action.
11833 - Metropolispd	Object	The Osborne Arms, in contrast to the Flying Pig, has never played an important community or indeed economic role by contributing to the vitality and vibrancy of the local area. The retention of the Flying Pig will achieve these objectives. Retention of the Osborne Arms is not commercially viable, even as a free house, given its proximity to the Flying Pig. Both pubs should be removed from the protection list. A 'new' and improved Flying Pig is to be provided in the redevelopment scheme. The operation and management of this pub has been agreed in principle with the existing tenants.	Concerns noted. While the loss of the public house may not have been an issue at the time of the planning decision, the loss of a pub or a potential pub is now a concern. Therefore, the IPPG should be applicable to any new planning application that involves the loss of a pub site (audited) despite it already having an alternative planning permission.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
11968 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Greyhound is the only one in its area and there are many properties in Coldhams Lane and adjoining streets for which this is the most accessible pub. Include on 'Important Local Community Facility' list.	Concerns noted. However, the Greyhound Public House has recently been the subject of a successful application 12/0255/FUL for the demolition of the building and replacement with a building to provide two commercial units in B1/B2/B8 Use, including trade counters. The Greyhound Public House has been closed from some time, and is situated on the edge of an industrial area and a residential area, with Coldhams Lane separating the two. The Public House sits on the industrial side of Coldhams Lane, with the busy road segregating the Public House from the residential area. Due to its positioning, the Public House was not considered part of the community, and was not therefore considered to be a valued facility, which met the community's day-to-day needs.	No further action.
12916	Object	The Penny Ferry other Chesterton pubs should be protected from development. Spade & Beckett / La Mimosa needs protection	Concern noted. The Penny Ferry and Fleur de Lys are now included in the list of Safeguarded Pubs at Section 5 of the IPPG. The Spade & Bucket/La Mimosa is considered to be a long standing conversion. The IPPG includes a number of more recent conversions. To be robust, the IPPG needs to reflect the current market.	Include the Penny Ferry and Fleur de Lys in the list of Safeguarded Pubs at Section 5 of the IPPG.
14787	Object	The Penny Ferry/Pike and Eel pub should be listed as a "City centre, riverside or village pub and bar sites providing an important economic and tourist function" and also as a "Pub Sites within edge of city clusters providing an important city wide economic and local community function."	Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG (City centre, riverside or village pub and bar sites providing an important economic and tourist function).	Include the Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.
11978 - Cambridge Past, Present and Future	Object	We would also concur with the supplied list of Pubs missing from the list, detailed by CAMRA in their submission. Rosemary Branch is the only pub in the northern part of Cherry Hinton and is, for many local residents, by far their closest pub. 'Important Local Community Facility' list.	Concern noted. The Rosemary Branch will be included in the List of Safeguarded Existing and Former Pub Sites within the sub-category of Pub Sites providing an important Local Community Facility in Suburban Areas.	Include the Rosemary Branch in the List of Safeguarded Existing and Former Pub Sites within the sub-category of Pub Sites providing an important Local Community Facility in Suburban Areas.
6876	Object	Is there nothing that can be done to save the Penny Ferry, formerly Pike and Eel?	Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.	Include the Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
7036 - Friends of Midsummer Common	Object	The Zebra is in the list of current pubs but it is closed. Should it be in another table.	Concern noted. Closed pubs are included within Section 5 as there is potential for them to reopen either now or in the future.	No further action.
13187 - Caldecotte Consultants	Object	The list of safeguarded public house sites have been categorised under three separate categories yet the requirement for demonstrating their viability in all circumstances is the same. This approach fails to recognise public houses operate under a single Use Class, in which regardless of a public house's location or facilities, in planning terms all are the same under Use Class A4 Drinking Establishments; with no planning controls existing on the way in which a public house business operating.	Concerns noted. However, the three categories of pubs do not have any bearing on how the IPPG operates. They are simply there for classification purposes, recognising the nature of the particular pub in terms of location and function.	No further action.
14861 - Old Chesterton Residents' Association	Object	We believe that the Penny Ferry/Pike and Eel pub should be listed as a "City centre, riverside or village pub and bar sites providing an important economic and tourist function" and also as a "Pub Sites within edge of city clusters providing an important city wide economic and local community function."	Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG (city centre, riverside or village pub and bar sites providing an important economic and tourist function).	Include the Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
11986 - Cambridge Past, Present and Future	Object	<p>We would also concur with the supplied list of Pubs missing from the list, detailed by CAMRA in their submission.</p> <p>Should include other former pubs converted to a restaurant:</p> <ul style="list-style-type: none"> <li>- Oak Bistro (former Oak/Lawyers)</li> <li>- La Mimosa (former Spade &amp; Beckett)</li> <li>- Back Street Brasserie (former White Hart)</li> <li>- Former Locomotive (currently close as a restaurant)</li> <li>- Spice Merchant (former Volunteer, Trumpington)</li> <li>- Wok'n'Grill, Trumpington (former Coach &amp; Horses)</li> <li>- former Durham Ox, Mill Road</li> <li>- former Globe, Newmarket Road</li> <li>- former Prince of Wales, Histon Road</li> <li>- former Little Rose, Trumpington Street</li> <li>- former Racehorse, Newmarket Road.</li> </ul>	<p>Concerns noted. The sites referred to relate to former pubs which became restaurants prior to 2006. Under the Use Classes Order, public houses and other A4 uses can change to higher order use class (A3, A2 or A1) without needing planning permission. Taking the case of a restaurant in a former public house building, if the public house already served food, it may already have a kitchen with extractor fans. Over time it may be permissible for the pub to turn into a restaurant without formally requiring planning consent. It is therefore difficult to determine when a public house changed into a restaurant, unless some form of audit took place or specific planning permission was granted, indicating a different use was now in operation. Anecdotal evidence may suggest when the change took place, but this could not be relied upon to confirm the date of conversion. It is therefore difficult to establish when a public house ceased being a public house and change use legitimately into a different use without planning permission. As such, it would therefore seem reasonable to only apply the proposed guidance to future planning applications for those public houses audited and on the safeguarding list. This issue is covered in new paragraph 2.2 of the IPPG which reads "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p>	<p>Insert new paragraph 2.2 to read "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p>
10208 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	<p>Penny Ferry appeal mentioned pre-dated the NPPF and a conservation area now covers the site. should be 'City Centre, Riverside ...' or 'Important Local Community Facility' category.</p>	<p>Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.</p>	<p>Include the Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.</p>



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8665 - Cambridge Past, Present and Future	Object	The Penny Ferry is incorrectly classified. -The appeal was heard in January when the NPPF was not in force and the Pub was not in an approved Conservation Area. Since then the NPPF has been finalised with strong guidance with regard to pubs, as well as non-designated heritage assets, and further important historic information is coming to light of which the inspector would have been unaware. -The Pub should be classified as a 'riverside Pub providing an important economic and tourist function'.	Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.	Include the Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.
8669 - Cambridge Past, Present and Future	Object	The Rosemary Branch is incorrectly classified. -There are no other pubs in the vicinity and we would argue there is a significant enough and growing local catchment. However, in the event that Cambridge East is developed then there would be an enormous potential catchment and there is no specific pub provision included in Cambridge East Area Action Plan (2008). -The Pub should be reclassified as providing an 'Important Local Community Facility in a Suburban Area'.	Concern noted. The Rosemary Branch will be included in the List of Safeguarded Existing and Former Pub Sites within the sub-category of Pub Sites providing an important Local Community Facility in Suburban Areas.	Include the Rosemary Branch in the List of Safeguarded Existing and Former Pub Sites within the sub-category of Pub Sites providing an important Local Community Facility in Suburban Areas.
7288	Object	I note with regret that the Penny Ferry/former Pike and Eel is approved for demolition. This decision is wrong. Please reconsider. Please see online petition and read the reasons people have given: <a href="http://www.ipetitions.com/petition/save-the-penny-ferry-pub/">http://www.ipetitions.com/petition/save-the-penny-ferry-pub/</a> 504 signatures (06/08/2012)	Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.	Include The Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.
11967 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	Rosemary Branch is the only pub in the northern part of Cherry Hinton and is, for many local residents, by far their closest pub. 'Important Local Community Facility' list.	Concern noted. The Council will amend the IPPG so the "Rosemary Branch" is moved into the Community Suburban Pub category.	Move the "Rosemary Branch" into the Community Suburban Pub category.
10203 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	4 existing pubs (the Bird, Wrestlers, Clarendon Arms and Man on the Moon) omitted and need to be added in. Add Bird and Clarendon to 'Edge of City Cluster' list Wrestlers and Man on the Moon to 'Important Local Community Facility' list.	Concerns noted. The Bird in Hand, Clarendon Arms and The Man on the Moon have been included within the edge of city cluster category on the List of Safeguarded Existing and Former Pub sites. The Wrestlers has been included as a Community Suburban Pub on the List of Safeguarded Existing and Former Pub sites.	Include The Bird in Hand, Clarendon Arms and The Man on the Moon within the edge of city cluster category on the List of Safeguarded Existing and Former Pub sites. Include The Wrestlers as a Community Suburban Pub on the List of Safeguarded Existing and Former Pub sites.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
11952 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	The remaining former pubs where planning permissions have begun become a separate category of "Former pubs whose redevelopment prevents them ever returning as a pub". However, given the sadly large number of other former pubs which fall within this definition, there may not be any particular value in having such a list (but if it is to be included, then it needs to be comprehensive)	Concerns noted. However, the three categories of pubs do not have any bearing on how the IPPG operates. They are simply there for classification purposes, recognising the nature of the particular pub in terms of location and function.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
10222 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Object	<p>Welcome pubs currently closed or turned into restaurants. Should include other former pubs converted to a restaurant:</p> <ul style="list-style-type: none"> <li>- Oak Bistro (former Oak/Lawyers)</li> <li>- La Mimosa (former Spade &amp; Beckett)</li> <li>- Back Street Brasserie (former White Hart)</li> <li>- Former Locomotive (currently close as a restaurant)</li> <li>- Spice Merchant (former Volunteer, Trumpington)</li> <li>- Wok'n'Grill, Trumpington (former Coach &amp; Horses)</li> <li>- former Durham Ox, Mill Road</li> <li>- former Globe, Newmarket Road</li> <li>- former Prince of Wales, Histon Road</li> <li>- former Little Rose, Trumpington Street</li> <li>- former Racehorse, Newmarket Road. If site developed, a pub should be included given the shortage of sites.</li> </ul>	<p>Concerns noted. The sites referred to relate to former pubs which became restaurants prior to 2006. Under the Use Classes Order, public houses and other A4 uses can change to higher order use class (A3, A2 or A1) without needing planning permission. Taking the case of a restaurant in a former public house building, if the public house already served food, it may already have a kitchen with extractor fans. Over time it may be permissible for the pub to turn into a restaurant without formally requiring planning consent. It is therefore difficult to determine when a public house changed into a restaurant, unless some form of audit took place or specific planning permission was granted, indicating a different use was now in operation. Anecdotal evidence may suggest when the change took place, but this could not be relied upon to confirm the date of conversion. It is therefore difficult to establish when a public house ceased being a public house and change use legitimately into a different use without planning permission. As such, it would therefore seem reasonable to only apply the proposed guidance to future planning applications for those public houses audited and on the safeguarding list. This issue is covered in new paragraph 2.2 of the IPPG which reads "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p>	<p>Insert new paragraph 2.2 to read "The IPPG guidance is to be applied to premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Local Plan and the NPPF. Buildings that were public houses in July 2006 are present on the list of safeguarded pubs at Section 5 and all of these are subject to the IPPG. This list includes any pubs with unimplemented planning permissions and applications involving these pubs will be determined in accordance with the IPPG despite the presence of unimplemented planning permissions for alternative uses."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7033	Object	<p>RE: THE GREYHOUND. A very bad idea for it to close despite having been cut off from some of its clientele, but there is nowhere near to the houses opposite for a very long way indeed. Suggest an overhead pedestrian crossing. Its a long trek to any other pub in the direction of Mill road. Local businesses will sometimes want to go to a pub. Greyhound designation should be moved into the same list as the Carpenters Arms. More community/co-operative work needed right now and it will, if it succeeds, help people in the very difficult times now and coming.</p>	<p>Concerns noted. However, the Greyhound Public House has recently been the subject of a successful application 12/0255/FUL for the demolition of the building and replacement with a building to provide two commercial units in B1/B2/B8 Use, including trade counters. The Greyhound Public House has been closed from some time, and is situated on the edge of an industrial area and a residential area, with Coldhams Lane separating the two. The Public House sits on the industrial side of Coldhams Lane, with the busy road segregating the Public House from the residential area. Due to its positioning, the Public House was not considered part of the community, and was not therefore considered to be a valued facility, which met the community's day-to-day needs.</p>	No further action.
11976 - Cambridge Past, Present and Future	Object	<p>We would also concur with the supplied list of Pubs missing from the list, detailed by CAMRA in their submission. Penny Ferry appeal mentioned pre-dated the NPPF and a conservation area now covers the site. should be 'City Centre, Riverside ...' or 'Important Local Community Facility' category.</p>	<p>Concern noted. The Penny Ferry is now included in the list of Safeguarded Pubs at Section 5 of the IPPG.</p>	Include The Penny Ferry in the list of Safeguarded Pubs at Section 5 of the IPPG.
11831 - Metropolispd	Object	<p>Planning permission (Ref:06/0552/FUL) was granted for redevelopment (August 2007) to provide mixed use scheme including the retention of the Flying Pig Public House(PH). Phase 1 (Botanic House) now complete.</p> <p>Pubs excluded from protection are based on various reasons, including those circumstances where planning permission has been granted for redevelopment or redevelopment has already occurred.</p> <p>Both reasons apply to The Flying Pig and Osborne Arms PHs; they are included within an approved redevelopment scheme that has already begun. Both of these pubs should be removed from the protection list.</p>	<p>Concerns noted. While the loss of the public house may not have been an issue at the time of the planning decision, the loss of a pub or a potential pub is now a concern. Therefore, the IPPG should be applicable to any new planning application that involves the loss of a pub site (audited) despite it already having an alternative planning permission.</p>	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8673 - Cambridge Past, Present and Future	Object	'The Dog & Pheasant' is incorrectly named 'The Golden Pheasant' in the list.	Comment noted. It is understood that the Golden Pheasant is a recent name of the restaurant. We have replaced this with Dog and Pheasant in Section 5 of the IPPG.	Insert Dog and Pheasant in Section 5 of the IPPG.
8140 - Januarys	Object	-Concerned that the IPPG is fundamentally unbalanced and provides no flexibility (as as required by the NPPF) to the suitability of alternative uses on the site. -No adequate explanation is given within the IPPG as to what the "value" of the public house is, how is it determined and who is the beneficiary? -No considered assessment as to in what respect the pubs listed in Section 5 provide an important local facility. Misleading to characterise pubs in this way without a proper assessment. Only those judged to be of value to the local community should be safeguarded.	Concerns noted. The IPPG accords with the NPPF in terms of providing protection to public houses being important community facilities while ensuring that redevelopment or change of use is possible subject to a set of criteria being met. This ensures that the IPPG is not anti development and that there is the flexibility to allow development where it would be in the interests of the economy or community. Notwithstanding the terms of the IPPG, public houses will retain a significant degree of economic flexibility with their ability to change to any of Use Classes A1, A2 or A3 without planning consent.	No further action.
11980 - Cambridge Past, Present and Future	Object	We would also concur with the supplied list of Pubs missing from the list, detailed by CAMRA in their submission. Greyhound is the only one in its area and there are many properties in Coldhams Lane and adjoining streets for which this is the most accessible pub. Include on 'Important Local Community Facility' list.	Concerns noted. However, the Greyhound Public House has recently been the subject of a successful application 12/0255/FUL for the demolition of the building and replacement with a building to provide two commercial units in B1/B2/B8 Use, including trade counters. The Greyhound Public House has been closed from some time, and is situated on the edge of an industrial area and a residential area, with Coldhams Lane separating the two. The Public House sits on the industrial side of Coldhams Lane, with the busy road segregating the Public House from the residential area. Due to its positioning, the Public House was not considered part of the community, and was not therefore considered to be a valued facility, which met the community's day-to-day needs.	No further action.
13182 - Caldecotte Consultants	Object	The list of safeguarded public house sites have been categorised under three separate categories yet the requirement for demonstrating their viability in all circumstances is the same. This approach ignores access to alternative public houses in the area. It is recommended that the criteria for change of use of a pub in an urban area be less strict for those pubs in a rural area, where access to alternatives is very different.	Concerns noted. The categories of public house assesses the value the public house has to the community. These do not determine how to assess the viability of the public house. The approach takes into account access to alternative public houses, criterion c and Annex C consider this.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7032	Support	<p>Glad to see the Carpenters Arms on Victoria Road is listed in the second section. It is the only pub on Victoria Road in a good, accessible location.</p> <p>Concerned that after its closure it would be developed.</p> <p>It is a highly suitable and large building with open space to the rear for a community run pub and family restaurant.</p> <p>Victoria Road is - community-wise - a desert right now, nowhere to stop and get a cup of tea or a pint, nowhere to chat however briefly with others.</p> <p>Previous landlord supported the local community.</p>	Support noted.	No further action.
10189 - Cambridge & District Branch of the Campaign for Real Ale (CAMRA)	Support	We fully support the concept of the list of safeguarded pubs.	Support noted.	No further action.
7196	Support	Please ensure that pubs that have already closed are not demolished whilst this consultation is in progress. The owners are often selling them now quickly in order to make money while they can. For example the Bird in Hand has closed recently and whilst it may not be viable at the moment, it is right next to a major new development (Berkeley Homes) that will create a lot of additional potential customers once the flats are being lived in.	Concern noted. Unless the building is a defined heritage asset, in a Conservation Area, or subject to an Article 4 direction withdrawing permitted development rights for demolition, the Council would not be able to prevent the demolition of a non-residential building. Whilst the imposition of Article 4 directions is a separate legal process from the adoption of the IPPG, with consequent resource implications, the Council will consider the need to use Article 4 directions for public houses. In the specific case of the Bird in Hand, the site is still protected as a pub by being in the list of safeguarded existing and former pub sites in Section 5 of the document.	The Council will consider the need to use Article 4 directions to protect public houses.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>Annex A - Marketing Strategies</i></b>				
<i>Annex A - Marketing Strategies</i>				
8163	Support	This is good; rigorous, and takes into account the problems of tied leaseholds and of pubs being deliberately run down very well indeed.	Support noted.	No further action.
7197	Support	Marketing must be overseen by an independent third party. There are many developers looking for sites who will pay over the odds. They have no interest in the local community just in a quick profit - also the motive of the breweries. Without safeguards, they will get round the rules. Free houses are a better bet than brewery ownership. The latter employ tenants with no incentive to give the pub character. It becomes part of a chain, with a standardised ambience including everything down to the hanging baskets. That it fails becomes a self-fulfilling prophecy.	Support noted.	No further action.
6946	Support	There is a need to preserve existing pubs wherever possible. It is important that opinions as to continued viability are supported by truly independent evidence.	Support noted.	No further action.

### ***Annex B - Viability Appraisals***

#### *Annex B - Viability Appraisals*

14780	Object	Viability assessments might include the need for investment. Location can be factored into considerations of viability.	Any viability assessment submitted will, by its very nature, need to consider the location of the premises as this will impact directly upon the existing and future customer base, the overall offer of the pub, and the scope for diversification. Similarly, investment will have to have been considered in appraising different options for diversification.	No further action.
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**Representations****Nature Summary of Main Issue****Council's Assessment****Action****Annex C - Community Catchments and Consultation****Annex C - Community Catchments and Consultation**

14789	Object	<p>It is unclear what criteria the Council will apply to determine the addition of any pubs (and what does 'certain pubs' mean?) to a Register of Community Assets.</p> <p>I believe the wording should read: The Council will maintain a Register of Community Assets and the Localism Act 2011 is clear that pubs can be nominated for inclusion on the Register. The Council will consider all such nominations through its agreed process.</p>	<p>Concerns noted. The Council has changed the wording in Annex C to read "The Council will maintain a Register of Community Assets. The Localism Act 2011 is clear that pubs can be nominated for inclusion on this Register. The Council will consider all such nominations through its agreed process."</p>	<p>Delete "The Council may also consider adding certain public houses to the Community Assets Register if the community support for their retention is significant."</p> <p>Insert "The Council will maintain a Register of Community Assets. The Localism Act 2011 is clear that pubs can be nominated for inclusion on this Register. The Council will consider all such nominations through its agreed process."</p>
14862 - Old Chesterton Residents' Association	Object	<p>It is unclear what criteria the Council will apply to determine the addition of any pubs to a Register of Community Assets and what 'certain pubs' or 'significant community support' means. We consider that the wording should read: The Council will maintain a Register of Community Assets and the Localism Act 2011 is clear that pubs can be nominated for inclusion on the Register. The Council will consider all such nominations through its agreed process.</p>	<p>Concerns noted. The Council has changed the wording in Annex C to read "The Council will maintain a Register of Community Assets. The Localism Act 2011 is clear that pubs can be nominated for inclusion on this Register. The Council will consider all such nominations through its agreed process."</p>	<p>Delete "The Council may also consider adding certain public houses to the Community Assets Register if the community support for their retention is significant."</p> <p>Insert "The Council will maintain a Register of Community Assets. The Localism Act 2011 is clear that pubs can be nominated for inclusion on this Register. The Council will consider all such nominations through its agreed process."</p>