

# Appendix 1: Greater Cambridge response to the Government's Consultation - Supporting Housing Delivery & Public Service Infrastructure.

**Q1 Do you agree that there should be no size limit on the buildings that could benefit from the new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3)?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

## The High Street

In terms of land valuations, many smaller Class E units are less valuable compared to residential land valuations and therefore these will be more susceptible to conversion, even if they are occupied by a sustainable business. It is these smaller units which attract small, individual businesses that provide (and will continue to provide) a unique retail/leisure experience/business use that cannot be offered online. These spaces will also help foster new local businesses that can respond to changing consumer trends and local circumstance.

It should not be forgotten that the high street is the centre of the community and most people view the high street as the centre of their community. No matter what issues there may be with parking, or litter, or ugly buildings, etc, it will always have a central role in providing its identity. A major part of that identity are the small independent retailers, who by their very nature create a different retail experience, providing a balance with the many multiples. They very much help give centres character and individuality and prevent high streets simply becoming nondescript shopping centres.

In retail, there is also an increasing move back to 'choice and variation' from a 'one size fits all' approach. In recent years, there has been a proliferation of specialist food providers, service providers and niche clothes shops, etc. Central to this is the artisanal approach, clearly identified with small producers and retailers. They add a new and more exciting dimension to local shopping that will help re-energise our high streets, and one that the major multiples will find inherently difficult to exploit. However, these niche providers often require small, affordable retail units to operate from.

It is therefore fair to assume the future of the high street involves independent shops; often run by the business owner and enthusiastic assistants who are willing to provide advice, conversation, or just the simple interchange of an everyday transaction. This all helps provide a more congenial retail experience compared with larger stores. Small business models are also much more agile compared to large retail chains and therefore they can respond quickly to changing consumer trends / needs and retain their appeal to consumers. One good example is the independent bookshop. Many have adapted to changing consumer trends by not only providing a traditional bookshop service and atmosphere, but they are also accompanied by an online service. This also allows them to provide people with a more 'socially conscious' alternative to large, e-commerce platforms allowing profits/revenues to be retained more locally. Local bookshops can also help curate a local literary culture.

Other useful services normally provided on the high street include hairdressers, barbers and other health and well-being related services. They are often operated by small, independent businesses in small retail units providing a tailored service that cannot be provided online. On the high street, their physical, individual character and appearance provides their location with a sense of place and appeal. It is these small business retail units which foster and encourage such uses need to be retained, if the high street is to be allowed to adapt to respond to the trend for online shopping.

In effect, independent local shops and services can have a very positive influence over an area's local character and sense of community. If an area can create a unique appeal and, or attractive atmosphere that cannot be found online, it will bring people back to the high street.

If small retail units are allowed to convert to residential units without local people being able to voice their concerns about their potential loss, the high street risks losing the very units needed to reinvigorate the high street with niche independent retailers and service providers. If centres can provide a distinctive retail experience, there is much greater chance they will be able to attract people back to the centres.

#### Village Shops / Local Centres

The proposed right is applicable nationally, with exemption to article 2(3) land such as those outlined in paragraphs 18 & 19 of accompanying Consultation document. However, with no size threshold, the proposed right could have a profoundly detrimental effect of local people's access to local shops and other useful services in village centres and even individual shops which provide a lifeline to local residents with limited mobility. Examples of these valuable retail units include a post-office, a bakery, a newsagent, a hairdresser or a small, convenience food shop many of which are often found in local/neighbourhood or rural village centres occupying small, low value retail/business (Commercial, Business and Service - Class E) units. If people are unable to access these services, to meet their day-to-day needs, their lives will be profoundly affected; not only will this lead to further exclusion, it will undermine their ability to lead a sustainable and, or independent lifestyle.

People will be forced to travel, often by car to access these shops and services. In addition to a less sustainable lifestyle, their closure risks alienating those who cannot drive or do not have access to a car, often younger and older sections of society. Less mobile people will also have to travel further undermining their ability to lead an independent lifestyle placing further pressure on already stretched social services.

In addition, these local shops and services are also an important source of local employment and social interaction. If they are replaced with residential units, these opportunities will disappear, to the detriment of a village's sustainability and sense of community; two key objectives sustainable planning is supposed to support, not remove.

### Out-of-town Centres

Technically, with no size limit, there is no reason why current out-of-town centres could not convert to residential use. Although not intended, there is a significant risk that if there was no size limit, then out-of-centre retail locations could convert to residential use. Under the proposed right, these developments would not be required to provide any associated social infrastructure. This would place exceptional pressure on any existing infrastructure which may not have any excess capacity to absorb this unmet demand. Their out-of-town location will also encourage car usage to access social infrastructure and other services and undermine the Government's own target of achieving net-zero emissions by 2050.

### Employment locations

The strength of business and innovation in Greater Cambridge is important for the rest of the UK. The area has nationally significant life sciences and ICT sectors and above average proportions of high growth businesses. Knowledge-based spin-outs from Cambridge University, Greater Cambridge based research institutes and some of our larger businesses have grown to become internationally significant businesses including Abcam (which offers research tools into proteins and other chemicals), Crescendo Biologics (therapeutics in oncology) and Kymab (developing antibody technologies). Some of these spin out businesses have moved to other parts of the UK supporting growth in these areas, for example Metalysis to South Yorkshire and PragmatlC Semiconductor's production operations to County Durham.

Key to maintaining a growing and evolving economy is the availability of a range of suitable premises for businesses in the different stages in their life cycle. Insufficient supply of space for new start-ups and early stage firms can lead to both start-ups and expansions being undermined or delayed.

The councils' recent Employment Land and Economic Development Evidence Study has found that there are severe supply pressures for small to mid-sized office occupiers in Cambridge city core. It also found that older and less prime office stock outside the core, which could have been utilised for SME's, has been lost to alternative uses like student flats through permitted development. Values in this outer area are much higher for residential compared to office use and developers have been keen to maximise residential space on the land, which exacerbates supply in the area that would have been suitable for SME's.

Overall, the Study identifies a floorspace affordability issue in the office and employment market in Greater Cambridge. Common issues include tenants being priced out of the market, long-waiting lists for new space and paying high rents. As a result, the consultants that prepared the Study concluded that workspace market in Greater Cambridge can be difficult for micro-enterprise and SME's to enter.

Introducing a new permitted development right which allows the conversion of smaller and medium-sized office, research and development and light industrial spaces without planning permission is likely to exacerbate the premises shortage in Greater Cambridge which is unlikely to be addressed by the market. This will impact on the key early stages of the lifecycles of businesses and ultimately therefore on the creation and growth of Greater Cambridge's, and ultimately the UK's, key economic clusters.

**Q2.1 Do you agree that the right should not apply in areas of outstanding natural beauty, the Broads, National Parks, areas specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981, and World Heritage Sites?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

These are protected areas and any proposed development should be determined with a planning application.

**Q2.2 Do you agree that the right should apply in conservation areas?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

Cambridge City Centre

The whole of Cambridge's historic core is within a conservation area. Cambridge city centre is a thriving regional centre and international tourist destination, in addition to providing for the needs of those living, working and studying in the city. It has an outstanding historic core. The city centre provides a wide range of uses including shopping, leisure, entertainment, museums, university faculty buildings and colleges, offices and housing. It is also the main transport hub, with all bus routes passing through the city centre and the bus station being located here.

In 2018, over 8 million people visited Cambridge contributing £850m to the local economy and accounting for 22% of all employment in Cambridge. Tourism related employment represents 16,357 jobs. The percentage of expenditure associated with trips to the area for Shopping and Food & Drink is 32% and 28%, respectively. This means that the economic benefits of tourism in Cambridge is significant. Jobs not only directly result from tourism businesses but also indirectly from their supply chain and the multiplier effects of spending by their employees.

While there may not be the number of tourists at the moment due to the travel restrictions in place on account of Covid-19, they are expected to return in 2021/22. It is therefore imperative that there is a local mechanism (i.e. planning permission) to

ensure any changes of use will not have an economic impact on the ability of the historic core to support the city's tourism sector.

Cambridge's population includes approximately 46,000 resident students. While both Universities do have their own student bars, it is unreasonable to believe that some students (not to mention local residents) would not want to visit the city centre for evening and night time uses such as visiting public houses, restaurants and theatres. Cambridge also serves as a sub-regional destination for leisure activities including nightclubs. It is therefore critical that Cambridge continues to provide a vibrant centre to attract and retain students and young people who may want to use these types of facilities.

The introduction of new residential uses in areas where the city's evening and nighttime businesses operate could undermine their long-term ability to operate. For example, complaints about noise made by new residents could lead to late licenses being rescinded. Amenity matters, such as noise are normally considered during the planning application stage, in particular the application of the Government's own National planning Policy Guidance (NPPG) section on Noise and advice provided on how planning can manage potential noise impacts in new development.

In effect, the introduction of residential uses in centres which support the evening and nighttime economy such as Cambridge city centre, could actually have the contradictory consequence of forcing existing businesses, users and visitors out of these centres undermining the role of the city centre.

The proposed right to convert Class E businesses to residential use would remove the local mechanism to ensure changes of use are properly considered through the planning application system. It is essential that important regional centres such as Cambridge, are able to retain a concentration of more diverse and attractive retail, cultural and hospitality offerings to cater to the various communities it serves, e.g. retail, leisure, tourism, education and commerce. Unmanaged conversion of retail

units to residential use without any impact assessment risks undermining many established businesses which cater to millions of tourists and thousands of students, not to mention local residents.

#### Villages.

Conservation areas in villages may contain “the village shop” or a small number of shops or local services important to the community and which ought to be subject to protection via planning permission before change to residential use.

### **Q2.3 Do you agree that, in conservation areas only, the right should allow for prior approval of the impact of the loss of ground floor use to residential?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

A requirement for prior approval of just ground floor loss to residential would be insufficient. Many town or city conservation area shops are of course, on more than one floor - bookshops and clothes shops are examples. Many are already struggling and the loss of upper floors via landlords wishing to take advantage of more financially valuable residential use could close them down. Similarly, many retail premises need an upper floor for storage or staff facilities and would be threatened if only the loss of the ground floor to residential use was to be subject to prior approval.

It would help the importance of retail in town centres if, where the building as a whole or its greater part was in retail or associated use when the instrument came into force, prior approval was to be required for the change to residential use of any part of it (this would be unnecessary if conservation areas are excluded from the proposed permitted development). This would still enable the desired aim of achieving residential units in many premises but would help maintain healthy town centre retail where such uses depend on more than just a ground floor premises.

**Q3.1 Do you agree that in managing the impact of the proposal, the matters set out in paragraph 21 of the consultation document should be considered in a prior approval?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Additional impacts need to be given proper consideration. These are:

- Impact on existing uses including those which support the evening and night time economy, for the following reasons:
  - The introduction of new residential uses in areas where the city's evening and nighttime businesses operate could undermine their long-term ability to operate. Complaints about noise made by new residents could lead to late licenses being rescinded.
  - Environmental matters such as noise need to be given due consideration to allow city centres to fulfil their function without prejudicing existing sustainable uses. In particular, the application of the NPPG section on Noise and advice provided on how planning can manage potential noise impacts in new development.
- Consultation with relevant stakeholders to identify potential impact on the existing centre.
  - The Government's own NPPG section on Town centres and retail, Paragraph: 003 Reference ID: 2b-003-20190722 explains which stakeholders are important when planning for town centres. These should be involved with any prior approval consultation requirement.
- In village locations and rural centres, an impact assessment on both the accessibility and availability of alternative retail units and local services to allow local people to continue to meet their day-to-day needs.

### Q3.2 Are there any other planning matters that should be considered?

Yes	X
No	
Don't know	

Please specify:

#### 'Town Centre First' Policy

The proposed right to convert Class E businesses to residential use, contradicts the Government's own 'Town Centre First' Policy. More specifically, NPPG section on Town centres and retail, Paragraph: 001 Reference ID: 2b-001-20190722: 'Planning for town centre vitality and viability'.

The Paragraph states "town centres as defined in the National Planning Policy Framework [NPPF] comprise a range of locations where main town centre uses are concentrated". NPPF Annex 2 defines Main town centre uses as "Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."

The same Paragraph goes on to explain how "a wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. ... Residential development in particular can play an important role in ensuring the vitality of town centres, ..."

The last section of the Paragraph states "Evening and nighttime activities have the potential to increase economic activity within town centres and provide additional employment opportunities. They can allow town centres to diversify and help develop their unique brand and offer services beyond retail. In fostering such activities,

local authorities will also need to consider and address any wider impacts in relation to crime, noise and security.”

In any city centre location, it is very important any new residential use is suitably located, to ensure residents can enjoy the amenity afforded by their residence without having an adverse impact on existing or new town centre uses that could inhibit the role and function of the centre including its economic potential. Centres need to be allowed to diversify their unique appeal to attract consumers who have become highly competitive, in terms of what they are looking for and where they will shop i.e. on the high street, in out-of-town locations and online.

To compete with these alternative locations, the traditional high street centre needs to be able to carry out a variety of roles and functions. The introduction of residential uses into a centre may provide much needed investment into a centre, however it should be allowed to do so without prejudicing either other existing centre uses/roles or its economic potential/function. If not carefully planned, there is a risk that existing uses may no longer be able to continue due to conflicting issues arising from the introduction of new residential uses without proper consideration. Typical issues, in busy city centre locations, designed for people to congregate throughout the day and evening may include lack of privacy and local amenity including - but not exclusively - noise, light and air pollution. The proposed right increases the risk of introducing significant conflict between new residential uses and established uses, without proper consideration for local amenity issues.

The same Paragraph also explains how “local planning authorities can take a leading role in promoting a positive vision for these areas, bringing together stakeholders and supporting sustainable economic and employment growth. They need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats, the impact these are likely to have on individual town centres, and how the planning tools available to them can support necessary adaptation and change.” The proposed right will remove the ability for a local planning authority to take a leading role in the promotion and development of these areas.

Moreover, the “evening and nighttime activities have the potential to increase economic activity within town centres and provide additional employment opportunities. They can allow town centres to diversify and help develop their unique brand and offer services beyond retail. In fostering such activities, local authorities will also need to consider and address any wider impacts in relation to crime, noise and security.”

The uncontrolled introduction of residential use, without proper consideration for local amenity poses a significant risk to existing businesses. Those connected to and providing for evening and nighttime activities, are conducive to a busy city centre such as Cambridge.

Furthermore, in 2018, over 8 million people visited Cambridge contributing £850m to the local economy and accounting for 22% of all employment in Cambridge. Tourism related employment represents 16,357 jobs. The percentage of expenditure associated with trips to the area for Shopping and Food & Drink is 32% and 28%, respectively. This means that the economic benefits of tourism in Cambridge is significant. Jobs not only directly result from tourism businesses but also indirectly from their supply chain and the multiplier effects of spending by their employees. The city is also home to approximately +40,000 residential students.

In order to secure the economic benefits of these sectors, it is imperative the city centre is able to provide a range of complementary businesses and services. The introduction of residential uses needs to be carefully planned to avoid any potential conflict between new residents and existing business users. The proposed right will remove the ability for a local planning authority to carefully manage such changes which risk the economic benefits existing businesses provide in these areas.

### Out-of-town Centres

There is also the very significant risk that if high streets are not able to retain and provide for a range of retail units (both large and small), there is considerable probability that retail will move to out-of-town centres which have remained popular with shoppers, both before and during the current pandemic.

In terms of sustainability, their out-of-town location (especially those beside busy road networks) encourage people to drive to these centres. If they can become the main location for retail shopping, they risk alienating those who cannot drive or do not have access to a car, often younger and older sections of society. Their out-of-town location will also encourage car use to access these centres which will undermine the Government's own target of achieving net-zero emissions by 2050.

#### Village/Rural Centre Viability

In village/rural centres, village services and facilities including village pubs, shops, post offices and financial services are protected from redevelopment, where their loss will result in an unacceptable reduction in the level of community or service provision in the locality. The proposed right will remove this protection and is, in effect contrary to sustainable development. The impact of the loss of any of these services and facilities will undermine the sustainability of the local area and will have social, environmental and economic consequences. The loss of these local services will also undermine the ability for these rural centres to accommodate additional growth, sustainably.

From a social and economic perspective, these services and facilities support community resilience by providing local opportunities for employment, small businesses, social interaction and community cohesion. Given the current Covid-19 pandemic, this is quite essential for people in small rural communities not to mention their long-term sustainability.

From an environmental perspective, people will be forced to travel, often by car to access these shops and services. In addition to a less sustainable lifestyle, their closure risks alienating those who cannot drive or do not have access to a car, often younger and older sections of society. Less mobile people will also have to travel further undermining their ability to lead an independent lifestyle placing further pressure on already stretched social services.

### Business parks / office-based employment sites

The proposed right risks undermining Greater Cambridge's economy (covering both Cambridge and South Cambridgeshire), at the centre of a significant high-tech cluster - The Cambridge Cluster - which also plays a significant role in the national economy. To put this into perspective, currently the Cambridge Cluster includes:

- 5,100+ knowledge intensive firms
- 69,100+ people employed by knowledge intensive firms
- £18bn in total turnover of knowledge intensive firms
- 450+ life science services and healthcare companies
- 3,080+ information technology and communication companies
- 810+ high-tech manufacturing companies
- 770+ knowledge intensive services companies

These businesses depend on the availability of sufficient B1 space. In Cambridge, office space is protected from redevelopment without satisfactory marketing information indicating it is no longer needed for business use. In both Cambridge and South Cambridgeshire, new employment site allocations for B1 uses are supported in their respective Local Plans. These are intended to allow Greater Cambridge's economy to grow sustainably.

Under recent changes to the Class Use categorisation, the B1 category has been replaced with the new Class Use E(g), allowing business uses which can be carried out in a residential area without detriment to its amenity:

- E(g)(i) Offices to carry out any operational or administrative functions,
- E(g)(ii) Research and development of products or processes
- E(g)(iii) Industrial processes; these replace B1(a), B1(b) & B1(c) respectively.

For reference: B1(a) Offices - Other than financial and professional services (not including health and medical services); B1(b) Research and development of products or processes; and B1(c) Industrial processes.

The proposed right will remove any protection afforded to these Class Use E(g) business spaces. The loss of an individual business space, in a central location may not seem sufficient to undermine the Cambridge Cluster. However, the aggregate effect

of several individual business premises converting to a residential use will undermine the ability for knowledge-based businesses to cluster and grow. This will compromise Greater Cambridge's and, given its significance, the UK's long-term economic prospects.

A case in point would be the recently regenerated area around Cambridge's main railway station, where many large high-tech companies are in very close proximity to each other. Their clustering helps to foster and encourage business collaboration and innovation. However, the risk to business development from the proposed right is not confined to centre locations.

Some of the key business parks that support the Greater Cambridge economy lie on the outskirts of Cambridge or within South Cambridgeshire's villages. From Melbourn Science Park to Cambridge Research Park to Granta Park, these sites provide the larger B1 footplates that life science and high-tech businesses need to expand as well as being an important sustainable source of local employment. They are fundamental to the success of the Greater Cambridge economy.

Technically, there is no reason why current B1 premises, covered under Class Use E(g) in rural centres or business parks could not convert to residential use. Under the proposed right, these developments would not be required to provide any associated social infrastructure. This would place exceptional pressure on any existing infrastructure which may not have any excess capacity to absorb this unmet demand. Their rural or out-of-town location will also encourage car usage to access social infrastructure and other services and undermine the Government's own target of achieving net-zero emissions by 2050.

We are not only concerned about those businesses that are part of the area's knowledge economy but also about those that must exist in order to support economies and communities to function effectively. These types of businesses are often in the first wave of companies pushed out as rising land prices due to residential demand and rising rental values make it unviable to remain. The introduction of permitted development rights from residential conversions could potentially push these

businesses out beyond a location where it is easy their business model to effectively function. This would not only impact on the businesses themselves but also on their workers. Cambridge was identified at the most unequal city in the UK in 2017 and a key part in reducing the gap between rich and poor is in ensuring that local people have access to a range of employment opportunities.

**Q4.1 Do you agree that the proposed new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3) should attract a fee per dwellinghouse?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Any application for Prior Approval will require processing and assessment within the PA parameters that are set and this will form a cost to the Council.

**Q4.2 If you agree there should be a fee per dwelling house, should this be set at £96 per dwellinghouse?**

Yes	
No	X
Don't know	

Please give your reasons:

It is likely the costs for processing any such application to be nearer to the cost of a normal planning application for the same.

**Q5 Do you have any other comments on the proposed right for the change of use from Commercial, Business and Service use class to residential?**

Yes	X
No	

Please specify:

Existing Services: The services of commercial buildings are specified, designed, and built very differently from residential buildings and are not necessarily conducive to conversion. For example, the service stacks are usually centralised and have a lower capacity than required for residential. If the buildings are converted without proper control the use of existing services could lead to unhygienic buildings that are not fit for purpose.

Existing structural grids: In addition, commercial buildings very often have structural grid much larger than for residential buildings, so if converted without control could lead to habitable rooms without natural daylight, or ventilation, and possibly inadequate means of escape.

Energy efficiency: Any works to change the use of existing buildings could be an opportunity to upgrade the thermal efficiency of the buildings, as well as reduce the water usage if subject to control.

SME opportunities: As we consider the economy going forward in the light of the climate crisis, there is the need to promote and enable the circular economy to do well. Already in Cambridge we have a growing number of shops now being used to alter or adapt clothes (3 that I know of in the centre and more on Mill Road), and there are show menders as well. These must be encouraged and small commercial spaces are ideal.

Libraries: Traditionally, libraries have been for borrowing books, CD and DVDs, but there is a growing interest in other libraries – garden tools, IT equipment, cycling maintenance tools, and these should be encouraged and small commercial spaces are ideal.

Staying Local: The experience of the Covid-19 restriction may mean that many more people will work for much longer periods where they live or nearby if there is the opportunity. This means opportunities for local commerce will increase and smaller commercial units will help encourage this.

Tourism: Even if international tourism does not go back to the pre-Covid numbers, it is already apparent that local tourism will flourish. How will this differ from international tourism? How will this affect our shops? It may be that local crafts do better than large brands that can be accessed in many cities. The opportunity of local crafts, arts, theatre, must be encouraged with small commercial units.

**Q6.1 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could impact on businesses, communities, or local planning authorities?**

Yes	X
No	
Don't know	

If so, please give your reasons:

**Businesses**

- Small, independent retail businesses could be denied access to small retail units, in which to operate. These includes small, local corner shops which provide valuable access to food and other local services to help people meet their day-to-day needs.
- The proposed right increases the risk of introducing significant conflict between new residential uses and established uses, without proper consideration for local amenity issues. In particular, the long-term ability of businesses, linked to Cambridge city centre's evening, night time and tourism economy, could be severely compromised. These businesses could be forced to close or limit their operations following the introduction of new residential units, on account of amenity issues.

- In 2018, over 8 million people visited Cambridge contributing £850m to the local economy and accounting for 22% of all employment in Cambridge. Tourism related employment represents 16,357 jobs. If retail units providing food, goods and other services to visitors, are lost to residential use, the city's tourism industry will be adversely impacted and affected. Their loss will compromise their ability to secure the economic benefits which flow from so many visitors to the city.
- A shortage of space for start-up and SME businesses has been identified in Greater Cambridge as affordable office stock has been lost. The ability of the market to re-provide this smaller affordable space is limited and any further loss of office floorspace is likely to impact on ability of businesses to start up and grow in area and ultimately on the success of the Greater Cambridge economy.
- The loss of protection for key employment sites could undermine the success of the Greater Cambridge economy as businesses are impacted by a loss of productive employment space in their required locations, a reduction in clustering opportunities and a shift in perception of the advantages of locating to the area.

### Communities

- The loss of local retail units providing valuable day-to-day goods and services will adversely impact local communities. Local people may have to travel longer distances to access these goods and services. People who don't drive or have access to a car may be particularly affected by the loss of these units.
- Local communities will also be undermined by the reduced availability of the opportunity for social interaction which local shops and services often provide. Social cohesion is also essential for the development and retention of good community relations.
- The opportunity of local employment will also be lost with the loss of local retail and service units and business space.
- The loss of a range of different employment opportunities will exacerbate the significant inequality gap that currently exists within Cambridge.

### Local planning authorities

- The proposed right will remove the ability for a local planning authority to take a leading role in the promotion and development of village, local, town, regional and city centres.
- Local planning authorities may be forced to introduce blanket-wide Article 4 Directions across its centres to rest back control of its centres.
- The proposed permitted right will also allow for the wholesale conversion of large out-of-town retail parks into residential units. Without associated local services and infrastructure, these developments would place significant pressure on existing infrastructure provision.

**Q6.2 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could give rise to any impacts on people who share a protected characteristic?**

Yes	X
No	
Don't know	

If so, please give your reasons:

- People with limited mobility or access to a car could find themselves unable to access basic day-to-day services, if retail units can convert to residential development without planning permission.
- People who are already trying to remain independent and lead an independent lifestyle, may require assistance to access retail and local services, to meet their day-to-day needs. This could put further pressure on social infrastructure provision.

## Supporting public service infrastructure through the planning system

**Q7.1 Do you agree that the right for schools, colleges and universities, and hospitals be amended to allow for development which is not greater than 25% of the footprint, or up to 250 square metres of the current buildings on the site at the time the legislation is brought into force, whichever is the larger?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

An essential part of the character of Cambridge stems from the spaces and grounds around buildings and the important role of trees and other landscape features. The city is characterised by its compact nature, well-defined and vegetated edges, open spaces, and the green corridors that extend into the city centre from the countryside. These many open spaces make a significant contribution to the character of Cambridge. These areas are also valuable in terms of supporting a range of city-wide strategies, such as supporting health and well-being, flood risk mitigation and climate change strategies. It is therefore essential that these spaces be protected while allowing improvements to their recreational capacity and/or environmental value.

The city's Higher Education institutions include Anglia Ruskin University and the University of Cambridge. The latter consists of 31 autonomous colleges, with an overall estate comprising around 650,000 sq m on 247 hectares, distributed across a number of key locations in the city centre, West Cambridge and North West Cambridge (Eddington). The latter two have been the focus of the University of Cambridge's growth and relocations in the past 14 years. The University of Cambridge's Eddington site was released from the Cambridge Green Belt to support the ongoing development of the University of Cambridge.

It should also be emphasised that many of the University's college properties, in the city centre and on the edge of the centre are Listed buildings and, or are located in Conservation Areas; and often surrounded by open spaces which help form the character of Cambridge. There is a clear presumption against the loss of open space of environmental or recreational importance. However, there may be circumstances where development proposals can enhance the character, use and visual amenity of open space, and provide ancillary recreational facilities, such as changing facilities, or materially improve the recreational or biodiversity value of the site.

In the case of school, college and university grounds, there might be a legitimate educational need that allows the potential for new educational buildings on parts of the site that are not in playing field or other formal sports use and could not readily be used as such (e.g. small areas of amenity grassland separated from the main playing field). At present, under the current Local Plan (adopted 2018), such proposals will be determined on a case-by-case basis on their merits and how they conform to sustainable development. Only proposals that respect the character of these areas and improve amenity, enhance biodiversity, improve sports facilities or increase public access will be supported. The proposed right to extend the footprint of a building would undermine the ability to assess proposals on their merits and how they conform to sustainable development.

It is imperative that a proposal will minimise its impact on the site's intrinsic qualities and where possible enhance the remaining part of the site. Due regard must also be given to any potential impact on the character and wider setting of the site. This is fundamental, given how important open spaces are to the intrinsic character of Cambridge.

The proposed right to extend removes any attempt for the relevant institutions (schools, colleges and universities, and hospitals) to make any attempt at minimising the loss of open space by building upwards, as opposed to building outwards. The intensification of the existing footprint should be the priority for both school and University expansion before developing on its outdoor green spaces. There is a particu-

lar risk that schools could lose valuable play areas and outdoor social areas for children to socialise and play informally. The proposed right will not require schools or universities to consider site intensification before expanding their existing building footprint.

**Q7.2 Do you agree that the right be amended to allow the height limit to be raised from 5 metres to 6?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

There are no in principle issues with the suggested change in height.

**Q7.3 Is there any evidence to support an increase above 6 metres?**

Yes	X
No	
Don't know	

Please specify:

Above 6m may well result in buildings starting to extend and have visual influence over a wider area, for example above nearby single storey buildings or established landscaping. The height consideration could be combined in such circumstances with a review of distance to site boundary if necessary.

**Q7.4 Do you agree that prisons should benefit from the same right to expand or add additional buildings?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

Such expansions are likely to attract wider public interest.

**Q8 Do you have any other comments about the permitted development rights for schools, colleges, universities, hospitals and prisons?**

Yes	
No	X

Please specify:

**Q9.1 Do you think that the proposed amendments to the right in relation to schools, colleges and universities, and hospitals could impact on businesses, communities, or local planning authorities?**

Yes	X
No	
Don't know	

If so, please give your reasons:

Local planning authorities

- The proposed right will remove the ability for a local planning authority to:
  - protect open spaces of environmental or recreational value
  - protect Listed buildings or the esthetic qualities of Conservation Areas
  - ensure the proposal minimises its environmental impact
  - ensure the proposal conforms to sustainable development

- The proposed permitted right will also allow for every University and school building to enlarge its footprint by 25%. Given the many academic buildings in Cambridge, the aggregate loss of open space and subsequent impact on the character of Cambridge could be quite significant. Furthermore, the aggregate loss of open spaces will also have a significant environmental impact on the local environment.

**Q9.2 Do you think that the proposed amendments to the right in relation to schools, colleges and universities, and hospitals, could give rise to any impacts on people who share a protected characteristic?**

Yes	
No	X
Don't know	

If so, please give your reasons:

**Q10.1 Do you think that the proposed amendment to allow prisons to benefit from the right could impact on businesses, communities, or local planning authorities?**

Yes	
No	X
Don't know	

If so, please give your reasons:

**Q10.2 Do you think that the proposed amendment in respect of prisons could give rise to any impacts on people who share a protected characteristic?**

Yes	
No	X
Don't know	

If so, please give your reasons:

**Q11 Do you agree that the new public service application process, as set out in paragraphs 43 and 44 of the consultation document, should only apply to major development (which are not EIA developments)?**

Yes	X
No	

Please give your reasons:

This will prioritise the most significant public service application types.

**Q12 Do you agree the modified process should apply to hospitals, schools and further education colleges, and prisons, young offenders' institutions, and other criminal justice accommodation?**

Yes	
No	X

If not, please give your reasons as well as any suggested alternatives:

It is unclear from the consultant document what 'prioritisation' means. There is an argument that public services wishing to expand are prioritised through the planning

regime as such proposals are likely to result in significant public benefit and are often also subject to external public funding constraints. However, the reality is that such proposals also attract significant public interest and that is reflected in the average time estimated. It may be appropriate to separate out prisons, young offenders' institutions and criminal justice accommodation from the list, as these types of uses are likely to generate more in principle objection and result in different types of impacts to educational and health related uses.

**Q13 Do you agree the determination period for applications falling within the scope of the modified process should be reduced to 10 weeks?**

Yes	
No	X

Please give your reasons:

This will make little difference and is an unnecessary amendment. Local planning authorities would ordinarily prioritise such applications. It is impracticable to suggest Committee meetings are rescheduled as a result.

**Q14 Do you agree the minimum consultation / publicity period should be reduced to 14 days?**

Yes	
No	X

Please give your reasons:

Strongly disagree.

Pre-application publicity is no substitute for consultation on an often complex set of supporting planning documents that require local groups, Parish Councils and interested parties to assess and provide feedback on. The reduction in timescale disenfranchises those groups unnecessarily. Pre-app is often high level and ability to scrutinise is limited.

**Q15 Do you agree the Secretary of State should be notified when a valid planning application is first submitted to a local planning authority and when the authority anticipates making a decision? (We propose that this notification should take place no later than 8 weeks after the application is validated by the planning authority.)**

Yes	
No	X

Please give your reasons:

This is an unnecessary micro-management of the process.

**Q16 Do you agree that the policy in paragraph 94 of the NPPF should be extended to require local planning authorities to engage proactively to resolve key planning issues of other public service infrastructure projects before applications are submitted?**

Yes	
No	X

Please give your reasons:

The responsibility to engage proactively on all public service infrastructure projects should be a requirement for all stakeholders, both public and private. However, the project instigator which holds the budget and formal responsibility for the project should be responsible for the resolution of key planning issues. Local Planning Authorities will always want to engage proactively to resolve key issues however they should not be made responsible for another public service provider's project.

Local Planning Authorities are already resource stretched and should not be made responsible for the resolution of key planning issues that they are not responsible for. That does not mean Local Planning Authorities will not want to engage proac-

tively but the resource implication of such action needs to be recognised and compensated accordingly. The project instigator could however enter into a Service Level Agreement to financially compensate for the involvement of Local Planning Authorities in helping to resolve key planning issues.

**Q17.1 Do you have any comments on the other matters set out in the consultation document, including post-permission matters, guidance and planning fees?**

Yes	
No	X

Please specify:

**Q17.2 Do you have any other suggestions on how these priority public service infrastructure projects should be prioritised within the planning system?**

Yes	X
No	

Please specify:

Greater specification of pre-planning documents to be shared with interested parties may aid a speedier planning process.

**Q18 Do you think that the proposed amendments to the planning applications process for public service infrastructure projects could give rise to any impacts on people who share a protected characteristic?**

Yes	
No	X

If so, please give your reasons:

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### **Consolidation and simplification of existing permitted development rights**

**Q19.1 Do you agree with the broad approach to be applied to the review and update of existing permitted development rights in respect of categories 1, 2 and 3 outlined in paragraph 76 of the consultation document?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

The broad approach is to be welcomed. A simplification of the rights is in order.

**Q19.2 Are there any additional issues that we should consider?**

Yes	X
No	

Please specify:

Any change to the rights should be accompanied by a technical guide to their implementation and what rights are afforded as per the Permitted development rights for householders - Technical Guidance to extensions. That may encourage their greater use and understanding by members of the public.

**Q20 Do you agree think that uses, such as betting shops and pay day loan shops, that are currently able to change use to a use now within the Commercial, Business and Service use class should be able to change use to any use within that class?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Changes from these use classes are to be welcomed.

**Q21 Do you agree the broad approach to be applied in respect of category 4 outlined in paragraph 76 of the consultation document?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

A simplification of the rights would be generally welcome.

**Q22 Do you have any other comments about the consolidation and simplification of existing permitted development rights?**

Yes	X
No	

Please specify:

Only that such revised provisions should also be accompanied by technical guides etc to allow the revisions to be more easily understood and implemented by all.

**End of survey**