Jobs
Topic Paper

Greater Cambridge Local Plan

Topic paper published alongside the First Proposals
(Regulation 18: The Preferred Options) Consultation 2021

GREATER CAMBRIDGE
SHARED PLANNING

1. Introduction and Purpose

This is one of eight topic papers produced to inform the consultation on the Greater Cambridge Local Plan: First Proposals. The topic papers are:

- Strategy
- Climate Change
- Green Infrastructure
- Wellbeing and Social
- Great Places
- Jobs
- Homes
- Infrastructure

All of the papers can be found on the Greater Cambridge Shared Planning website.

The topic papers set out how the preferred option for each policy under the relevant Local Plan 'Theme' has been developed. As such, the topic papers support and complement the First Proposals consultation document as they provide a detailed explanation of the basis for each preferred policy approach. The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to and development of the preferred option. The content and structure for each policy option is:

- the issue the plan is seeking to respond to;
- the national, regional and local policy context that informs how the plan should address the issue;
- how consultation and engagement have informed the policy's development;
- the evidence that has informed the preferred policy option;
- the proposed policy approach and reasons why this is preferred, including alternative options considered;
- an explanation of how Sustainability Appraisal (see below) has informed development of the preferred policy option; and
- further work and next steps.

A Local Plan must be informed by consultation and engagement as well as statutory processes, such as Sustainability Appraisal and Habitats Regulations Assessment, and the requirements of national planning policy. These important elements of plan-making have, therefore, informed development of the First Proposals for the Local Plan and are the subject of separate reports, and are also available on the Greater Cambridge Shared Planning website. These form part of the overall consultation and are summarised below.

Greater Cambridge Local Plan Statement of Consultation

The Statement of Consultation sets out how the Councils have undertaken consultation, and propose to undertake consultation, in preparing the Greater Cambridge Local Plan.

The Statement will be updated at each stage of the plan making process; the current version supports the First Proposals stage.

The approach to Local Plan consultation is founded on the Councils' Statement of Community Involvement. This sets out how and when we will involve the community and key stakeholders in preparing, altering and reviewing our plans and guidance for future development. It also explains how we will involve the community in planning applications.

The current version of the Statement of Consultation provides details of the consultation and engagement we have undertaken to date. This includes events before and after the first formal consultation on the plan, as well as details of the formal consultation itself, known as The First Conversation. The Statement summarises what have you told us so far and how we have taken this into account in developing the Local Plan.

Greater Cambridge Local Plan Sustainability Appraisal

A sustainability appraisal is a systematic process required by law that must be carried out during the preparation of a local plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Sustainability appraisal should be applied as an ongoing process informing the development of the plan throughout its preparation.

Reasonable alternatives are the different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan.

A Sustainability Appraisal Scoping Report was subject to consultation alongside the First Consultation in January 2020. A sustainability appraisal was also completed on the First Conversation. In November 2020 an appraisal was carried out to inform the testing of development strategy options. These reports can be found on the Greater Cambridge Shared Planning website in the document library section.

The Greater Cambridge Local Plan First Proposals Sustainability Appraisal report has now been published, which considers the proposals and option identified in the

First Proposals report. It includes a non-technical summary of the information, providing a clear and accessible overview of the process and findings.

The sustainability appraisal report sets out the reasonable alternatives considered as the plan has evolved, including the preferred approach in each case, and assesses these against the baseline environmental, economic and social characteristics of the area.

Greater Cambridge Local Plan Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) refers to a process which must be undertaken by law to determine if a plan or project may affect the protected features of a habitats site. European Sites and European Offshore Marine Sites are referred to as 'habitats sites' in national planning policy.

All plans which are not directly connected with the conservation management of a habitat site require consideration of whether the plan or project is likely to have significant effects on that site. This consideration should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.

If a proposed plan or project is considered likely to have a significant effect on a protected habitats site then an appropriate assessment of the implications for the site, in view of the site's conservation objectives, must be undertaken. An appropriate assessment for a local plan should consider the impacts on sites and confirm the suitability or likely success of mitigation measures.

The HRA process began in 2020 with the publication of the HRA Scoping Report alongside the First Conversation in January 2020, which identified European sites with potential to be affected by the Local Plan. In November 2020 an assessment of the strategic spatial options was published. These reports can be found on the Greater Cambridge Shared Planning website in the document library section.

An HRA has now been carried out of the proposals in the First Proposals Report and published to accompany the consultation.

Greater Cambridge Local Plan Duty to Cooperate: Statement of Common Ground

The purpose of the Greater Cambridge Local Plan Duty to Cooperate Statement of Common Ground is to set out the main areas of common and uncommon ground with relevant partners on strategic cross-boundary matters. It also forms part of the evidence required to demonstrate that the Councils have complied with the duty to cooperate in preparing the local plan.

The Statement of Common Ground responds to the requirement in national planning policy and guidance that strategic policy-making authorities are expected to document the activities undertaken when in the process of addressing strategic cross-boundary matters whilst cooperating. These will include the following matters that should be tailored to address local circumstances:

- working together at the outset of plan-making to identify cross-boundary matters which will need addressing;
- producing or commissioning joint research and evidence to address cross-boundary matters;
- assessing impacts of emerging policies; and
- preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated.

The Statement of Common Ground is intended to provide the outcome at a point in time of the ongoing cooperation with relevant bodies regarding strategic cross-boundary matters. It is intended to be a concise sign-posting document. It is closely related to the First Proposals Duty to Cooperate Statement of Compliance and to the First Proposals Statement of Consultation.

Greater Cambridge Local Plan Equalities Impact Assessment (EQIA)

The Public Sector Equality Duty, introduced under the Equality Act 2010, requires all public bodies, including Councils, to have due regard to the need to eliminate unlawful discrimination, harassment, and victimisation; advance equality of opportunity between those who share a protected characteristic and those who do not; and foster good relations between those who share a relevant protected characteristic and those who do not.

An EQIA provides a methodical approach to the assessment of impacts across the protected characteristics set out in legislation. An assessment should be completed during the development and review of all Council policies, strategies, procedures, projects or functions.

EQIA was carried out at the First Conversation stage at January 2020, and in relation to the testing of strategic options in November 2020. These reports can be found on the Greater Cambridge Shared Planning website in the document library section.

The Greater Cambridge Local Plan First Proposals Report Equalities Impact Assessment has now been proposed to provide an assessment of the policies and proposals in the consultation.

2. Overall Context for Jobs

2.1 Background

The Greater Cambridge Local Plan First Conversation consultation in 2020 identified Jobs as one of the key themes for the new local plan to address.

The consultation identified key issues relating to:

- Space for businesses to grow - ensuring that there is sufficient land for business uses, in the right places and to suit different business types and specific business clusters.
- Protecting existing employment land – protecting existing business sites, in particular for industry.
- Creating a range of jobs - supporting a range of businesses to be successful in this area, providing a range of job types and at a range of different skills levels.
- Where jobs are created - Where new business space should be sited.
- How our city, town and village centres evolve and adapt - how our town centres adapt to the changes in retail, and how do we make sure day to day needs are met locally.
- Managing the visitor economy – how do we support the opportunities brought by tourism, but also address the challenges.

We asked you:

- What kind of business and industrial space do you think is most needed in the area?
- Do you think we should be protecting existing business and industrial space?
- How should we balance supporting our knowledge-intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?
- In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?
- How flexible should we be about the uses we allow in our city, town, district, local and village centres?
- What approach should the next plan take to supporting or managing tourism in Cambridge and the rural area?

We have reviewed the responses you gave us, and you will find the issues raised summarised in this topic paper.

We published our initial evidence findings in November 2020 relating to the implications of different development strategy choices available to the Local Plan, and we help some workshops with stakeholders on these issues.

Since them we have been preparing the First Proposals, and further developing the evidence that supports the plan.

2.2 Proposed Approach

The following proposed policies areas are addressed in this topic paper. For each of these, further detail is provided on the national, regional and local policy context, the consultation and engagement undertaken, the evidence informing it, the proposed approach and reasons for its selection, and details of further work on the issue that will be undertaken for future stages of the plan making process.

- J/NE: New Employment Development Proposals
- J/RE: Supporting the Rural Economy
- J/AL: Protecting the Best Agricultural land
- J/PB: Protecting existing business space
- J/RW: Enabling Remote Working
- J/AW: Affordable Workspace and creative industries
- J/EP: Supporting a range of facilities in employment parks
- J/RC: Retail and Centres
- J/VA: Visitor Accommodation, Attractions and Facilities
- J/FD: Faculty Development and Specialist/Language Schools

3. Further Work and Next Steps

The next step in the plan making will be to prepare a draft Local Plan for consultation. This will be informed by the comments we received through this consultation, and further development of the evidence base which supports the plan.

We will also continue to monitor the impacts of the Covid19 Pandemic as the plan making process continues, and update our evidence related to this at future stages.

Subject to consultation, the next steps for the Enabling Remote Working policy direction would be to prepare a detailed policy. The policy will outline the types and scale of the local employment hubs that will be supported. The detail of the policy will be then be drawn up at Draft Plan stage.

Further work would be required to develop the details of Affordable Workspace and creative industries policy, for example the size of the larger commercial developments that it would apply to, the scale of affordable workspace required and whether there will be any requirements in terms of the management of the centres. These would be worked up for the Draft Plan stage.

The Greater Cambridge Retail and Leisure Study has been commissioned to support the review of the joint Local Plans for Cambridge and South Cambridgeshire. The study comprises of two sections.

1. The first comprises of a baseline report to provide a review of current retail and leisure provision in Greater Cambridge. This is now complete.
2. The second section which will inform the Draft Plan will include the identification of retail and leisure needs including the needs of strategic developments outline the revised hierarchy of centres for Greater Cambridge. This gives an additional period for the retail picture to stabilise before the detailed study is prepared.

The councils' engagement with Cambridge's shopping centres will continue through the development of the Greater Cambridge Local Plan.

With the disruption and uncertainty caused to the hospitality industry by Covid-19, the assessment of visitor accommodation needs will now also be prepared to inform the Draft Plan. It is expected that the position in respect of the tourism market for Greater Cambridge will be clearer at this stage, and the draft plan will respond to this evidence.

With respect to the Faculty Development and Specialist/Language Schools policy direction, there are two pieces of work that are taking place that will need to be considered at Draft Plan stage:

- Anglia Ruskin University is developing a new masterplan for their Cambridge campus on East Road. Working with Anglia Ruskin, the Councils will review and assess the masterplan and consider the implications for the Draft Local Plan.

- The University of Cambridge is reviewing their Strategic Estates Masterplan. Working with the University, the Councils will review and assess the masterplan with the aim of reviewing any specific site allocations in the Draft Local Plan, to support the implementation of the masterplan, subject to the necessary planning consents.

4. J/NE New Employment Development Proposals

4.1 Issue the Plan is Seeking to Respond to

The Greater Cambridge Local Plan will need policies to guide how windfall proposals for employment development will be considered. It will need to set out the considerations that will determine whether proposals for employment development in urban areas, villages, and the countryside are acceptable.

4.2 Policy Context

National Context

Paragraph 81 of the National Planning Policy Framework (2021) states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 82 includes that that planning policies should, 'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'

Regional / Local Context

South Cambridgeshire District Council's Business Plan for 2020-2025 includes the priory area: "We will support businesses of all sizes, including rural enterprise and farming, to help create new jobs and opportunities near to where people live."

Actions for 2021 to 2022 include helping start-ups, home-based businesses and those moving into South Cambridgeshire to find workspace.

Adopted Local Plans

The adopted South Cambridgeshire Local Plan (September 2018) includes: E/9: Promotion of Clusters; E/11: Large Scale Warehousing and Distribution Centres; E/12: New Employment Development in Villages; E/13: New Employment Development on the Edges of Villages; E/15: Established Employment Areas; E/16: Expansion of Existing Business in the Countryside

Policy E/9 supports development in suitable locations which supports the development of employment clusters. Policy E/11 establishes that large scale warehousing and distribution centres will not be permitted in the district. Policy E/12 supports employment development within development frameworks in villages, provided that the scale of development would be in keeping with the category and scale of the village, and be in character and scale with the location. Policy E/13 allows for development on the edge for villages in certain circumstances, including on brownfield land, where there is evince of no suitable buildings available in the village, and it is justified by a business case. Policy E/16 supports the expansion of existing businesses in the countryside where the scale and location are appropriate and justified by a business case. Policy E/15 recognises that there are a number of Established Employment Areas and supports redevelopment of existing buildings and appropriate development for employment in these areas.

The adopted Cambridge Local Plan (October 2018) includes: Policy 40: Development and expansion of business space.

Policy 40 encourages new offices, research and development and research facilities locations in the city centre and the Eastern Gateway, b. in the areas around the two stations, in the Cambridge Biomedical Campus (including Addenbrooke's Hospital), and at the West Cambridge site. Proposals elsewhere in the city will be considered on their merits.

4.3 Consultation and Engagement

As part of our First Conversation consultation we asked you "In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?"

Sustainability was a key issue in many of the responses with requests that employment space be located be close to where people live in order to reduce the need to travel and in locations with good public transport access and active travel opportunities. Specific examples included locating high densities uses such as larger office premises close to rail stations and supporting growth close to new infrastructure such as new East West Rail stations.

There was support for dispersing employment across Greater Cambridge including in new communities, existing (and new) clusters and employment sites, neighbourhood and village locations and on the edge of Cambridge. Where references were made to specific villages, they tended to be those with larger populations. There was preference for development on brownfield rather than greenfield land.

For light industrial, industrial and warehousing and distribution uses close proximity to major road networks at the edge of villages or in close proximity to services and existing employment uses was suggested.

The general provision of a range of size of sites was recommended and there were specific suggestions for neighbourhood and village locations to include smaller flexible and co-working spaces as well as space on industrial estates and business parks. Within new or the expansion of existing communities, start-up and incubator space was suggested as well as a requirement that all new developments have some flexible employment space.

A range of alternative sites and locations were suggested and many of these were submitted in the call for sites. There was an objection to new employment space and specifically development at Addenbrookes.

There was a caution that business locations should not adversely impact residential areas in relation to visual and traffic impacts.

Finally, at the smallest level, it was recommended that in ordered to support homeworking, homes be provided with flexible spaces and good broadband with proximity to local cafes and co-working spaces.

4.4 Evidence Base

Greater Cambridge Employment Land Review (2020)

The Employment Land Review highlights the wide range of businesses and locations which contribute to the Greater Cambridge economy. Chapter 2 provides an overview of the property market for employment uses both locationally and according to different employment sectors. Chapter 3 highlights the role of economic clusters in Greater Cambridge.

4.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

Employment development (classes E(g), B2 and B8) will be supported:

- In Cambridge at sites set out in the Greater Cambridge Local Plan First Proposals document that is part of this consultation, and within appropriate mixed use areas of major change and opportunity areas. Other employment proposals to be considered on their merits where they are of an appropriate scale, character and accessible location.
- Within towns and villages, where it is of an appropriate scale and character to the location and scale of settlement. The policy would cover both new premises and the expansion of existing premises.
- Close to but outside settlement boundaries of villages subject to a number of criteria (described below).
- In defined 'established employment areas in the countryside' (listed below).
- In the countryside only where the expansion of existing businesses fulfils a number of criteria (described below).

Large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge.

Reasons for the Proposed Policy Direction

As set out in the Greater Cambridge Local Plan First Proposals document, a range of key employment locations have been identified to support the Cambridge economy. However, there is a range of small employment sites scattered all over the city. Proposals for new employment development will be considered on their merits using the range of other policies that will be included in the plan.

Sensitive small-scale employment development can help sustain rural economies and provide a wider range of employment opportunities for local residents. Providing jobs near to residents to reduce the need to travel was a key issue that was raised during the First Conversation consultation and supports a number of the Plan's other themes including climate change and social inclusion.

For developments within town and village settlement boundaries, scale and character are key to ensuring that the overall character of the village is maintained. For example, it would be expected that larger proposals are more likely to be considered favourably in Rural Centres.

The proposed approach to development frameworks generally restricts uses in the countywide to those specifically that need to be there in order to restrict unsustainable forms of development. However, there is also a desire to support the rural economy and local job opportunities.

On the edge of villages, the desire to support the rural economy is balanced against the need to protect the countryside from gradual encroachment and to help guard against incremental growth in unsustainable locations. Development in these locations would be permitted subject to a number of criteria that include: evidence of the lack of availability of alternative sites and premises; previous development on the site (or evidence that no alternative suitably developed sites); there is a business case for a viable development; a named first occupant can be cited; the scale and character of the development are in keeping with the category and scale of the village and accessibility by cycle and foot.

The proposed approach to settlement boundaries (policy SS/SB) generally restricts uses in the countryside to those specifically that need to be there in order to restrict unsustainable forms of development. However, there is also a desire to support the rural economy and local job opportunities. There are many firms working in the rural areas of South Cambridgeshire away from settlements, and we want to continue to support them. Whilst in general new development in the countryside is restricted, there are circumstances where the expansion of these firms would be acceptable. The policy would define these circumstances through a series of criteria that include: evidence of the viability of the existing business and jobs growth;

appropriateness of scale, location and appearance and evidence that these do not negatively impact on the countryside; the reuse of existing buildings where possible and no significant adverse traffic impact.

Recognising that a number of business parks are located in the rural areas of South Cambridgeshire these key employment sites outside the green belt were identified in the Local Plan 2018 as ‘Established Employment Areas in the Countryside’. It is proposed to continue this designation for the sites previously identified to support their continued evolution:

- Cambourne Business Park, Cambourne;
- Brookfields Business Estate / Park, Twentypence Road, Cottenham;
- Land at Hinxton Road, South of Duxford;
- Granta Park, Great Abington;
- Wellcome Trust Genome Campus, Hinxton;
- Cambridge Research Park, Landbeach;
- Site to North of Cambridge Research Park, Landbeach;
- Daleshead Foods Ltd, Cambridge Road, Linton;
- Eternit site, Meldreth;
- Norman Way Industrial Estate, Over;
- Former Spicers site, Sawston;
- Buckingway Business Park, Swavesey;
- Convent Drive / Pembroke Avenue site, Waterbeach.

Site specific policies are proposed for a number of these sites in the Greater Cambridge Local Plan First Proposals document of this consultation where they are undergoing substantial change. Where replaced by other policies they would no longer be included under this policy.

National Planning policy requires local planning authorities to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. The Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) explores the presence of clusters in the area, including their needs and opportunities, involving consultation with key stakeholders. In particular, the study highlights the presence of Life Sciences, ICT, Professional Services and Advanced Manufacturing.

The Strategy theme of this consultation proposes a range of sites and policies which are particularly suited to supporting the needs of clusters. These include significant opportunities at:

- North East Cambridge
- West Cambridge
- North West Cambridge
- Cambridge Biomedical Campus

- Welcome Trust Genome Campus
- Granta Park
- Babraham Research Campus
- New Towns at Northstowe and Waterbeach.

Cluster related employment is not restricted to these areas, and there are smaller concentrations, and individual firms both in Cambridge and the rural areas of South Cambridgeshire. Developments proposed to support clusters which meet the proposed policy requirements in J/NE would be supported, particularly where they include provision of a range of suitable units, including for start-ups, SMEs, and incubator units.

A need for additional space for warehousing and distribution (Use Class B8) was identified in the Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) and potential sites are proposed to be allocated (see the Strategy section of this consultation). However, whilst we need to meet the needs for local distribution, as a central location the area may be desirable to national distributors. Given the very high land take of this type of use, the local pressures on land supply for a range of uses, and the greenbelt location, it is proposed that the plan continues to not support large scale regional and national distribution proposals.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy – Not considered a reasonable alternative as this would not provide adequate policy guidance, would fail to support the economy, including the rural economy.

4.6 Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

5. J/RE Supporting the Rural Economy

5.1 Issue the Plan is Seeking to Respond to

Policies are generally restrictive towards new development in the countryside, but some uses are needed to ensure that the rural economy of South Cambridgeshire is able to thrive.

Agriculture makes an important contribution to the Greater Cambridge economy, but increasingly farms are diversifying into other business areas in order to remain viable. They also need to continue to adapt to respond to changes in environmental standards, climate change and to new Government funding schemes. It is important that diversification proposals are well founded in terms of effectively contributing to the agricultural business and the rural economy and integrating new activities into the environment and the rural scene.

Rural buildings have provided many opportunities for conversion for employment uses in the district and provide a way of supporting the rural economy and making best use of an existing resource.

5.2 Policy Context

National Context

Paragraph 84 in the National Planning Policy Framework (2021) states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings, and the development and diversification of agricultural and other land-based rural businesses.

Defra's Agricultural Policy transition plan for England, The Path to Sustainable Farming: An Agricultural Transition Plan 2021 to 2024 (November 2020), sets out the support that will be available for farmers following the UK's exit from the Common Agricultural Policy. The plans aim to achieve:

- a renewed agricultural sector, producing healthy food for consumption at home and abroad, where farms can be profitable and economically sustainable without subsidy
- farming and the countryside contributing significantly to environmental goals including addressing climate change

Capital investment in, for example, equipment, technology, and infrastructure is a component of number of the new schemes, such as the Farming Investment Fund.

Regional / Local Context

South Cambridgeshire District Council's Business Plan for 2020-2025 includes the priory area: "We will support businesses of all sizes, including rural enterprise and farming, to help create new jobs and opportunities near to where people live."

Actions for 2021 to 2022 include helping start-ups, home-based businesses and those moving into South Cambridgeshire to find workspace.

Adopted Local Plans

The South Cambridgeshire Local Plan 2018 includes policy E/17 Conversion or Replacement of Rural Buildings for Employment, which sets out the circumstances where proposals will be supported. Policy E/18 Farm Diversification seeks to support rural based enterprises where they are consistent in scale with their rural location; reuse existing buildings where possible, and are supported by a Business Plan to demonstrate how the proposal will support the continued operation of the agricultural and other land based rural businesses.

5.3 Consultation and Engagement

Diversification and the re-use of farm buildings were not addressed in our First Conversation consultation. However, we did receive feedback that supported market gardening and farming, including to produce local food and reduce food miles.

5.4 Evidence Base

Farm Accounts for England provide results from Defra's Farm Business Survey. The latest results, from the 2019/20 survey, include information on the level and nature of diversification being undertaken by farm businesses. They indicate the important economic contribution that diversification make to farm businesses and to the rural economy in general. Diversification is defined as "non-agricultural work of an entrepreneurial nature on or off farm but which utilises farm resources" (page 22). A brief summary is provided below.

In 2019/20, 68% of farm businesses in England had some form of diversified activity. This has risen from 58% in 2013/14. Total income from diversified activities in 2019/20 was £734 million and, across all farms, income from diversified enterprises accounted for over a quarter (28%) of total Farm Business Income. The main diversified activity was letting out buildings for non-farming use (45% of farms), followed by solar energy (22%) and sport and recreation (13%).

The Greater Cambridge Employment Land and Economic Development Evidence Study, November 2020 (GLHearn with Iceni Projects Ltd, SQW and Cambridge Econometrics) discusses the use of farm buildings for employment.

It describes the reuse of farm buildings as creating a land use efficiency by recycling sites and refurbishments are typically lower cost than new build (but not significantly so). Such conversions, it states, should be encouraged to diversify rural employment activity and to provide some supply for small industrial uses unable to afford premises prices closer to Cambridge.

Examples of former farm building locations being used for general employment uses are also provided including Oakington Business Park where the building footprints, if not the buildings themselves, have been converted from agriculture to a suite of smaller office units.

5.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

Support proposals for diversification schemes which enable continued operation of agricultural and other land based rural businesses particularly where they are engaged in sustainable land management or renewable / low carbon energy, where they are appropriate in scale to their location and, where possible, reuse existing buildings.

Support the re-use of rural buildings in the countryside for employment purposes, where they are of permanent and substantial construction and in keeping with their surroundings. Allow the replacement of such buildings where it would bring about environmental improvement and a more sustainable development.

Reasons for the Proposed Policy Direction

It is important that the plan restricts the scale of development in the countryside where large scale development would be unsustainable. Rural buildings, such as farm buildings no longer needed for agriculture, provide opportunities for conversion for employment uses in the district, and provide a way of supporting the rural economy and making best use of an existing resource.

The plan also needs to support land-based businesses and farms to continue to thrive. To do this many have diversified into other business areas. They also need to continue to adapt to respond to climate change and to new Government funding schemes. It is important that diversification proposals are well founded in terms of effectively contributing to the agricultural business and the rural economy and integrating new activities into the environment and the rural scene.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy – This is not the preferred approach, as not including a policy would not provide sufficient support land based businesses, or the re-use of buildings.

Greater flexibility for residential uses of rural buildings – This is not the preferred approach. Current policy requires buildings for be effectively marketed for employment first. Removing this preference would reduce the opportunities to support the rural economy and encourage residential development in the countryside where there is greater reliance on the private car to access everyday services.

5.6 Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

6. J/AL Protecting the Best Agricultural land

6.1 Issue the Plan is Seeking to Respond to

South Cambridgeshire has a significant resource of good quality agricultural land, and this is a valuable resource that needs to be protected. The sector is a key economic and environmental asset with the total farmed area of Greater Cambridge over 72,000 ha.

Much of the best agricultural land lies around Cambridge and the larger settlements, which may be the most sustainable locations for future development. The need to identify and maintain a large supply of land for development means there is pressure for development of agricultural land.

Soil is an important biodiversity asset and key to the environmental ecosystem. Some of the most significant adverse impacts on soil occur as a result of activities associated with construction activity.

6.2 Policy Context

National Context

Paragraph 174 of the National Planning Policy Framework (2021) states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), and of trees and woodland. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

Planning Practice Guidance for the Natural Environment paragraph 001 states that planning policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land (Grades 1, 2 and 3a). It also describes soil as an essential natural capital asset that provides important ecosystem services and goes on to reference Defra's Code of practice for the sustainable use of soils on construction sites which, it says, provides advice on the use and protection of soil in construction projects, including the movement and management of soil resources. It also suggests that the code may be helpful when setting planning conditions for development sites.

The Government's 25-year environment plan A Green Future: Our 25 Year Plan to Improve the Environment sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It states that environmental protections already enshrined in national planning policy will be maintained and strengthened including the protection of the best agricultural land.

Regional / Local Context

South Cambridgeshire District Council's Business Plan for 2020-2025 includes the priory area: "We will support businesses of all sizes, including rural enterprise and farming, to help create new jobs and opportunities near to where people live."

Adopted Local Plans

Existing Policy NH/3 in the South Cambridgeshire Local Plan 2018 Protecting Agricultural Land states that planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless the land is allocated for development in the Local Plan or sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.

The Policy also states that uses not involving substantial built development, but which take agricultural land will be regarded as permanent unless restricted specifically by condition and that when considering proposals for the change of use or diversification of farmland, particular consideration shall be given to the potential for impact upon Priority Species and Habitats.

6.3 Consultation and Engagement

The potential role of agricultural land in helping to gain biodiversity was mentioned when our First Conversation consultation asked how we can achieve biodiversity net gain through new developments. However, responses to our economic questions did not refer to agricultural land quality.

6.4 Evidence Base

Under the Agricultural Land Classification, agricultural land is graded from 1 to 5. The highest grade goes to land that:

- gives a high yield or output
- has the widest range and versatility of use
- produces the most consistent yield
- requires less input

Best and most versatile agricultural land is graded 1 to 3a.

Natural England Provisional Agricultural Land Classification mapping, May 2020 shows that South Cambridgeshire has a significant proportion of excellent (Grade 1), very good (Grade 2) and good to moderate (Grade 3) agricultural land.

Farmland is also important for biodiversity whether it is arable or pastoral. South Cambridgeshire being still a largely rural district has a large proportion of open farmland which has a variety of habitats on both high and low grade agricultural land. This provides an extensive biodiversity resource for the district.

Much of the best agricultural land lies around Greater Cambridge's larger settlements including Cambridge itself. These may be the most sustainable locations for future development, therefore it is important to ensure that the economic and environmental benefits from high grade agricultural land are protected.

Defra's Agricultural Policy transition plans for England focus Environmental Land Management support for farmers on sustainable farming practices, including improving soil quality; creating habitats for nature recovery; and making landscape-scale change such as establishing new woodland and other ecosystem services.

Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites aims to help achieve good soil management at all stages of the construction process. It describes soil as a fundamental and ultimately finite resource that fulfils a number of functions and services for society which are central to sustainability. It states that some of the most significant impacts on soil occur as a result of activities associated with construction activity.

The Code of Practice describes where adverse impacts on soil from construction can come from:

- covering soil with impermeable materials, effectively sealing it and resulting in significant detrimental impacts on soils' physical, chemical and biological properties, including drainage characteristics;
- contaminating soil as a result of accidental spillage or the use of chemicals;
- over-compacting soil through the use of heavy machinery or the storage of construction materials;

- reducing soil quality, for example by mixing topsoil with subsoil; and
- wasting soil by mixing it with construction waste or contaminated materials, which then have to be treated before reuse or even disposed of at landfill as a last resort.

The protection of peat soil is addressed under the climate change theme.

6.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

Restrict development which would lead to the irreversible loss of the best agricultural land (Grades 1, 2 or 3a) unless it is allocated in the local plan to meet development needs, or sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land. In addition, the impact of development on soils and the protection of soil quality must be considered, through careful management during construction.

Reasons for the Proposed Policy Direction

South Cambridgeshire has a significant resource of good quality agricultural land, and this is a valuable resource that needs to be protected. The sector is a key economic and environmental resource with the total farmed area of Greater Cambridge over 72,000 ha.

Much of the best agricultural land lies around Cambridge and the larger settlements, which may be the most sustainable locations for future development. The need to identify and maintain a large supply of land for development means there is pressure for development of agricultural land.

Farmland is also an important biodiversity asset for Greater Cambridge. Defra's Agricultural Policy transition plans for England focus support for farmers on sustainable farming practices, including improving soil quality; creating habitats for nature recovery; and making landscape-scale change such as establishing new woodland and other ecosystem services.

Soil is a key element of the environmental ecosystem. Some of the most significant adverse impacts on soil occur as a result of activities associated with construction activity. It is important that development is carefully managed to ensure that these impacts are minimised.

Alternative approaches, and reasons why they were rejected

No Policy – Not considered a reasonable alternative as national planning policy requires the plan to consider the impact on agricultural land.

6.6 Further Work and Next Steps

Subject to consultation, the next steps would be to prepare a more detailed draft plan.

7. J/PB Protecting existing business space

7.1 Issue the Plan is Seeking to Respond to

Employment sites and business premises in Greater Cambridge are under pressure for redevelopment from residential and other uses. There is a particular pressure on industrial land in Cambridge with reduced space and rising land values pushing industrial uses out of the city (or out of business). There is also pressure on employment land in villages.

The uncontrolled loss of employment land reduces the sustainability of local communities. Less local employment opportunities can reduce the vibrancy of communities and mean that people have to travel further for work, or to access local services.

7.2 Policy Context

National Context

Paragraph 81 of the National Planning Policy Framework (2021) states that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."

Amendments to the Use Class Order were published on 20th July 2020 and came into force on 1st September 2020. The regulations create, amongst other things, a new use class: E – commercial and business services - which incorporates a number of previously separate use classes including A1 (shops), A2 (financial and professional), A3 (restaurants and cafes), B1(a) (offices), B1(b) (research and development), B1(c) (light industrial) as well as parts of D1 (non-residential institutions) and D2 (assembly and leisure). Transferring between uses within Use Class E does not require planning permission.

Regional / Local Context

The Oxford-Cambridge Arc Economic Prospectus (October 2020) states that "Inclusivity is central to the Arc and our ambition and values. We will reduce health and social inequality by creating opportunities, raising productivity through skills, infrastructure and placeshaping investments."

Cambridge Anti-Poverty Strategy 2020-2023 Action Plan includes the action to "Explore opportunities to spread the benefits of economic growth through the development of the new Greater Cambridge Local Plan" and the performance measure "Local Plan evidence base considers the needs of deprived communities and opportunities to promote a range of different employment types as part of the evidence base".

South Cambridgeshire District Council's Business Plan for 2020-2025 includes the priory area: "We will support businesses of all sizes, including rural enterprise and farming, to help create new jobs and opportunities near to where people live."

7.3 Consultation and Engagement

In our First Conversation consultation when we asked whether you think we should be protecting existing business and industrial space, there was support to protect employment land in rural areas and sustainable locations, where it meets local needs and reduces commuting distances and the associated impacts on the environment. The need to protect sites associated with waste management, concrete, coated roadstones, and rail heads from the pressures for housing land was specifically referenced.

A number of responses raised the need to assess existing employment space to review performance against proposed carbon reduction measures in the Plan and to determine how essential it is for certain businesses to be in Cambridge and the most appropriate locations to continue employment uses.

We received differing views on whether require appropriate marketing of employment sites before change of use can be allowed.

There were also responses that gave examples of where employment land should not be protected, for example, uses that are now inappropriate for the local area due to noise and the use of the local road network by HGVs, land that is under-utilised and could be used for residential development and to reduce water usage. There was also a general objection to the arbitrary protection of employment space.

7.4 Evidence Base

Regional / Local Context

The Greater Cambridge Employment Land and Economic Development Evidence Study, November 2020 (GLHearn with Iceni Projects Ltd, SQW and Cambridge Econometrics) (ELR) provided a review of the economic development and employment land needs of the Greater Cambridge area to 2041.

It found that the demand for residential and other uses has pressurised land values and reduced the industrial supply in Cambridge. At a certain point, it explains, it becomes inefficient with customers and employees having to travel too far (or not travelling at all) to businesses outside of the city.

As a result, the consultants recommend that some industrial locations should be protected in the city to support the economic needs and diversity of employment opportunities. They also suggest that the release of these sites should be assessed on a site by site basis.

For Cambridge, where the Cambridge Anti-Poverty Strategy (Cambridge City Council, 2020) evidences a significant proportion of residents receiving low levels of pay and/or claiming benefits, protecting existing industrial sites is considered a vital part of developing a more inclusive economy.

Adopted Local Plans

The existing Cambridge Local Plan (2018) and the South Cambridgeshire Local Plan (2018) include policies on the protection of business space and employment land. These policies were assessed by the ELR's consultants.

Policy 41, Protection of Business Space, in the Cambridge Local Plan states that development will not be permitted on protected industrial sites which would result in a loss of floorspace or land within use class B or sui generis research institutes unless: the loss of floorspace would facilitate the redevelopment (including the potential for modernisation) and continuation of employment uses; or the site has been realistically marketed for a period of 12 months for employment uses and other employment uses do not prove possible on the site.

The policy also states that there will be a presumption against the loss of any employment uses outside protected industrial sites. Development (including change of use) resulting in the loss of employment uses will not be permitted unless: the loss of a small proportion of floorspace would facilitate the redevelopment and continuation of employment uses (including the potential for modernisation); or the site is vacant and has been realistically marketed for a period of 12 months for employment use and no future occupiers have been found.

The Employment Land Review (2020) finds that this policy continues to be appropriate given:

- the continued pressure on employment floorspace for the development of residential and other uses.
- the business constraints and rising rents created by the loss of sites which should encourage site improvement and investment where business activities are protected.

In the South Cambridgeshire Local Plan (2018), Policy E/14, Loss of Employment Land to Non-Employment Uses resists the conversion, change of use or redevelopment of existing employment sites unless it is demonstrated that the site is inappropriate for any employment use to continue having regard to market demand (12 months marketing), the overall benefit to the community outweighs any adverse effect on employment opportunities or the existing use is generating environmental problems such as noise, pollution or traffic levels. Viability evidence is required to demonstrate why an element of employment cannot be provided as part of a scheme.

The Greater Cambridge Authority Monitoring Report monitors the loss of employment land and shows a continual gradual loss to other uses happening in villages.

The ELR finds that this policy provides a reasonable level of protection for employment sites including the need for 12 months marketing as a minimum. They write that the elements of the policy relating to community benefit and environmental problems might be considered superfluous in any future Local Plan review given the qualitative nature of community benefit and agent of change principle issues related to environmental effects, in so far as new development (i.e. residential) should not lead to a prejudicing of existing employment activities.

The ELR included an assessment of existing employment sites in Greater Cambridge. This comprised existing employment locations, allocated sites, vacant sites and sites benefiting from extant permission for employment use. In total 71 employment sites were identified for assessment across Greater Cambridge.

Policy recommendations were provided for each site. Options for each site were:

- Protect
- Retain - assumes that the existing policy framework will suffice
- Release

The consultants recommended that the following sites remain protected or are added to the protection list:

- Cheddars Lane, Cambridge
- Beadle Industrial Estate, Ditton Walk, Abbey
- Henley Road and Coldham’s Road, Cambridge
- Mercers Row Industrial Estate (including Swanns Road), Abbey
- North of Coldham's Lane, Cambridge (including Church End Industrial Estate and College Business Park).
- King’s Hedges Road – Kirkwood Road / Kilmaine Estate, King’s Hedges
- Ronald Rolph Court, Ditton Walk, Abbey
- South of Coldham's Lane, Cambridge
- Barnwell Business Park, Abbey

7.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

The Local Plan will seek to protect employment land from loss to other uses in Greater Cambridge, including specific protection for industrial sites in Cambridge. Where loss is proposed, it will need to be justified by evidence that it is no longer needed (by being effectively marketed, with the plan setting out what this would entail).

The following industrial sites in Cambridge will be protected from development that would result in the loss of employment floorspace or land.

- Cheddars Lane, Cambridge
- Beadle Industrial Estate, Ditton Walk, Abbey
- Henley Road and Coldham's Road, Cambridge
- Mercers Row Industrial Estate (including Swanns Road), Abbey
- North of Coldham's Lane, Cambridge (including Church End Industrial Estate and College Business Park).
- King's Hedges Road – Kirkwood Road / Kilmaine Estate, King's Hedges
- Ronald Rolph Court, Ditton Walk, Abbey
- South of Coldham's Lane, Cambridge
- Barnwell Business Park, Abbey

Reasons for the Proposed Policy Direction

Employment sites and business premises in Greater Cambridge are under pressure for redevelopment from residential and other uses. There is a particular pressure on industrial land in Cambridge with reduced space and rising land values pushing industrial uses out of the city (or out of business). There is also pressure on employment land in villages.

The uncontrolled loss of employment land reduces the sustainability of local communities. Less local employment opportunities can reduce the vibrancy of communities, and mean people have to travel further for work, or to access local services.

The City Council's Anti-Poverty Strategy (2020-2023) evidences a significant proportion of residents receiving low levels of pay and/or claiming benefits, protecting existing industrial sites is considered a vital part of developing a more inclusive economy.

Based on the evidence, including recommendations within the Greater Cambridge Employment Land and Economic Development Evidence Study, it is proposed that specific protection of industrial sites within Cambridge is included in the new Greater

Cambridge Local Plan. This would form part of a policy which seeks to resist the loss of employment space across Greater Cambridge which would cover the whole of the area including the city, villages and countryside. It would set out the tests that apply to different locations, and how those tests can be met.

The ELR consultant's recommendations that the elements of the South Cambridgeshire Loss of Employment Land policy relating to community benefit and environmental problems might be considered superfluous in any future Local Plan review is rejected. It is considered that the two conditions do provide an element of flexibility to respond to local issues, however it is important they are implemented robustly.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy, allow employment land to be changed to other uses without restriction – This is not the preferred approach, as it is considered there is to the need to protect employment sites.

7.6 Further Work and Next Steps

Subject to consultation, the next steps would be to prepare a more detailed draft plan.

8. J/RW Enabling Remote Working

8.1 Issue the Plan is Seeking to Respond to

Whilst there has been trend towards workers working all or part of their working week from home over recent years, the COVID-19 Pandemic has dramatically accelerated this shift. Whilst the post-pandemic future remains uncertain, surveys suggest that many companies and workers will look to continue some level of homeworking.

Not all homes have the space and facilities for homeworking and, whilst they appreciate not having to take part in the daily commute, some workers would prefer to work in a shared space.

8.2 Policy Context

National Context

The National Planning Policy Framework (2021) paragraph 82 states that planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

Regional / Local Context

The Cambridgeshire & Peterborough Local Economic Recovery Strategy (LERS), March 2021, highlighted the impact of the Covid pandemic on changing preferences for housing with increased homeworking showing up in real estate markets as increased demand for properties with access to private and public green spaces.

South Cambridgeshire District Council's Business Plan for 2020-2025 includes the priory area: "We will support businesses of all sizes, including rural enterprise and farming, to help create new jobs and opportunities near to where people live." Actions for 2021 to 2022 include helping start-ups, home-based businesses and those moving into South Cambridgeshire to find workspace.

Adopted Local Plans

Existing Policy H/18 in the South Cambridgeshire Local Plan 2018 Working at Home supports the partial conversion, extension or change of use of residential dwellings to enable the residents to work at or from part of the dwelling will be permitted where the rest of the property remaining in residential use and there being no significant harm to the residential amenity of neighbours.

There is no equivalent policy in the Cambridge Local Plan 2018.

8.3 Consultation and Engagement

In our First Conversation consultation we asked you a range of questions focused on the local economy.

We had a number of responses that request policies that support flexible and homeworking in order to respond to changing work patterns.

The need to provide dwellings with flexible spaces and good broadband services was highlighted as well as cafes and co-working spaces in close proximity to homes.

8.4 Evidence Base

The Greater Cambridge Employment Land and Economic Development Evidence Study, November 2020 (GLHearn with Iceni Projects Ltd, SQW and Cambridge Econometrics) reported that, according to the Labour Force Survey (LFS), in 2019 nationally 5.1% of workers mainly worked from home.

In terms of the office-based sector, up to 15% of the ICT sector mainly worked at home while for other office-based organisations, 12-13% of workers worked from home. When looking at 'worked at home in the week prior' data, the figures increase to between 18-33% for largely office-based sectors, although for administrative and support workers this figure was lower at 10%. This suggests that pre-pandemic the occasional working at home was significant.

Whilst there has been a growing trend towards home based working, the COVID pandemic has led to a significant shift in the work patterns of workers in office-based businesses in the UK. ONS Business and individual attitudes towards the future of homeworking, UK (April to May 2021) analysis captures the outcomes of a number of ONS surveys including the Annual Population Survey, the Business Insights and Conditions Survey and the Opinions and Lifestyle Survey. It reports that on average 37% of people in employment did some work at home in 2020 an increase from 27% in 2019.

The Business Insights and Conditions Survey identified large differences between industries, with the majority of the workforce in businesses in Information and Communication; and Professional, Scientific and Technical activities industries remote working from 5 to 18 April 2021 (81% and 71%).

The Survey also asked whether businesses see homeworking continuing. Of businesses that had not permanently stopped trading, 24% stated that they intended to use increased homeworking going forward, with 28% unsure. The Information and

Communication industry recorded the highest proportion (49%) followed by the Professional, Scientific and Technical activities industry (43%).

Where some companies may have been behind the technology curve ten months ago, lockdown and the Government's requirement for people to 'work from home where you can', has led many of them to invest in technology that enables their staff to work remotely.

Whilst the scale of longer-term impacts remains to be seen, it has been reported that businesses are already reviewing the size of their office footprints to take advantage of the potential for cutting premises costs as a result of the acceleration of this technology enabled shift.

Many workers welcome this change, valuing the reduction in the time and money spent commuting and the promise of flexibility in future working patterns. However, for others there can be difficulties in working at home, including lack of space, difficulties with childcare and the impacts on mental health of solitary working.

For firms too, particularly those in the knowledge-based economy, there can be downsides to this remote working with the loss of human contact reducing the exchange of ideas and innovation associated with day to day contact and networking.

When the ONS Opinions and Lifestyle Survey asked about individuals' perspectives of advantages and disadvantages of homeworking, working adults stated work-life balance was the greatest positive, while challenges of collaboration were the greatest negative.

8.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

Policies will support the creation of local employment hubs, outlining acceptable types, scale and location of development.

They will also support for partial conversion, extension or change of use of residential dwellings to enable the residents to work at or from part of the dwelling, subject to criteria addressing, for example, the impacts on neighbours of traffic, noise and disturbance and the character and appearance of the proposals.

Reasons for the Proposed Policy Direction

Local Plan policies can help to enable this shift to homeworking through supporting the partial conversion, extension or change of use of residential dwellings to enable the residents to work at or from part of the dwelling. This support would be subject to criteria such as impact on residential amenity the detail of which will be drawn up at draft plan stage.

Some small scale homeworking may not require planning permission as it is covered by Permitted Development Rights. However, where homeworking does require planning permission, the impacts on neighbours of traffic, noise and disturbance and the character and appearance of the proposals will need to be assessed.

The Plan can also support those residents that are not able to or do not wish to commute to a centrally located office but equally are unable to work in their own homes or wish to work in a shared space with other workers through supporting the development of Work Hubs within residential communities.

Work hubs would provide shared space for workers located within buildings in local neighbourhoods. Size would generally be dependent on the size of the local community. In villages they would be smaller in scale but in cities and towns they could be considerably larger. Businesses and workers using such spaces are often charged a membership fee rather than a rental charge.

Community work hubs could provide an accessible, sustainable solution for workers. They could also support the development and growth of new enterprises not only through the exchange of knowledge with peers but also by providing a focus for business support provision.

An example locally is the shared workspace located in the Grafton Centre. Another example is the ARC Club Homerton in London which describes itself as "…the best of the office at the end of your street. Because everything you need should be in your neighbourhood".

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy – This is not the preferred approach, as the COVID-19 pandemic has emphasised the need to support flexible working arrangements.

8.6 Further Work and Next Steps

Subject to consultation, the next steps would be to prepare a detailed policy. The policy will outline the types and scale of the local employment hubs that will be supported. The detail of the policy will be drawn up at Draft Plan stage.

9. J/AW Affordable Workspace and creative industries

9.1 Issue the Plan is Seeking to Respond to

There is evidence of a shortage of affordable workspace for start-up businesses and SMEs across Greater Cambridge. The issue is more apparent and increases further towards Cambridge city centre.

Common issues include tenants being priced out of the market, long waiting lists for new space and high rents. As a result, the workspace market in Greater Cambridge can be difficult for micro-enterprises and SME's to enter.

Creative industries play a significant role in the Greater Cambridge economy. However, businesses in the creative sector have found it increasingly difficult find affordable workspace in the area.

9.2 Policy Context

National Context

The National Planning Policy Framework (2021) paragraph 81 states that planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Paragraph 82 states that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

Paragraph 83 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Planning Practice Guidance on Plan-Making outline the steps in gathering evidence to plan for business. They include:

- preparing and maintaining a robust evidence base to understand both existing business needs and likely changes in the market, with reference to local industrial strategies where relevant; and
- engaging with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.

Regional / Local Context

Cambridge Anti-Poverty Strategy (Cambridge City Council, 2020) includes an objective to promoting an inclusive economy, by raising skills and improving access to a range of employment opportunities for people on low incomes.

The Greater Cambridge Economic Action Plan includes the following action: "Complete study into employment land and reflect findings in new Greater Cambridge Local Plan. Ensure that capacity/opportunity to increase the number of village workspaces is included in the Plan."

An objective of the Cambridge City Council Corporate Plan 2019-2022 is to ensure a varied cultural offer is available to those who live, work and study in, and visit, Cambridge.

Inspiring Cambridge (January 2017) sets out a shared vision for the potential of arts and culture to take a leading role in the future of Cambridge and its surroundings. The Cambridge Arts and Cultural Leaders group identified the following ambitions:

1. Connecting the whole community through arts and cultural activity
2. Exploiting our rich cultural assets to become a world leading location for cultural learning and innovation
3. Contributing to sustainable growth
4. Developing a creative welcome, making the city's excellent cultural offer more easily accessible.

The Leaders Group includes Cambridge City Council and a range of key organisations and businesses involved in the creative sector across Cambridge.

South Cambridgeshire District Council's Business Plan for 2020-2025 includes the priory area: "We will support businesses of all sizes, including rural enterprise and farming, to help create new jobs and opportunities near to where people live."

Actions for 2021 to 2022 include helping start-ups, home-based businesses and those moving into South Cambridgeshire to find workspace.

Adopted Local Plans

The Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018 do not include policies on this issue.

9.3 Consultation and Engagement

In our First Conversation consultation we asked you a range of questions focused on the local economy and your preferences for the type and location of business and industrial space in Greater Cambridge.

We received several responses that raised the need for new start-up, incubator and small business and workshop space in the area including flexible workspace and co-working hubs with shared facilities. It was felt important that these spaces could adapt to changing circumstances. Short-term premises for pop-ups were also highlighted as an option.

The need for small, affordable start-up units in new developments was raised including space for lower skilled businesses and to protect existing businesses. Affordability, it was suggested, could come through subsidised or low rents.

There was support for the creation of creative jobs in arts and culture and the need for art galleries and youthful cultural spaces was recognised.

In general, the suggested locations for these spaces were not restricted to a particular area. Villages, new settlements, expanding housing and employment areas, urban areas and rural areas were all proposed.

9.4 Evidence Base

Demand for small business workspace

Business count statistics in Greater Cambridge show that an overwhelming proportion of enterprises are micro and small businesses. In South Cambridgeshire the figure is 97.8% and in Cambridge it is 96.1% (ONS Inter Departmental Business Register, 2020).

Evidence from Greater Cambridge Employment Land and Economic Development Evidence Study, November 2020 (GLHearn with Iceni Projects Ltd, SQW and Cambridge Econometrics) (ELR) indicates that there is a shortage of affordable workspace for start-up businesses and SMEs across Greater Cambridge. The issue is more apparent and increases further towards Cambridge city centre.

Common issues include tenants being priced out of the market, long waiting lists for new space and high rents. As a result, it reports, the workspace market in Greater Cambridge can be difficult for micro-enterprises and SME’s to enter.

The high demand for small business space is supported by a report commissioned by South Cambridgeshire District Council ('Managed Workspace on Cambridge Compass Enterprise Zone sites' by Building Partnership Ltd with Nautilus Associates and Cheffins, 2019). Managed workspaces is a catchall term for a range of different workspaces whereby a level of support is provided that is greater than the simple provision of office or workshop floorspace with external access and car parking. It can range from the provision of reception facilities to intensive on-site support for tenants including investment.

The report identified high occupancy rates in most managed workspaces across the area with good demand for a range of different products across the spectrum of enterprise centre, business incubator and co-working hub.

Demand in the Creative Sector

Greater Cambridge area plays a significant role within the creative economy. The Greater Cambridge Creative Industries report prepared by Cambridge City Council (June 2020) estimated that there are 3,093 creative businesses located in Greater Cambridge, making up 11.4% of all businesses in the area. This did not include businesses that were not VAT registered which the report estimated to be an additional 1,453 small enterprises bringing the Greater Cambridge total to 4,545.

Creative businesses range from architecture, crafts and fashion design to advertising, TV and radio and software design. These types of businesses cut across traditional sector definitions, for example, a games developer in the ICT sector is also likely to be defined as a creative business.

Pre-Covid (and potentially post Covid) the future of the creative sector in area looked positive. The Creative Workspace Supply and Demand Study (Simon Poulter Associates, March 2020) reported that in 2018, Nesta (Creative Nation, February 2018) estimated that 75% of approximately 900,000 new jobs created within the creative industries between 2013 and 2030 will be in 10 top locations, of which Cambridgeshire is positioned ninth, with the lion share expected to be within the Greater Cambridge area.

For young people graduating from secondary education in 2024, the growth of creative jobs was predicted to more than double the average growth of all occupations across the UK at 5.3%, and 2.5% respectively (Creativity and the Future of Work, Nesta, 2018).

Creative businesses and the creative sector are not only important to jobs and growth. The sector can support social cohesion, health and well-being, placemaking and it can have a positive impact on the life chances of young people.

Based on desktop research, a survey of the users and providers of creative workspaces, interviews and focus groups, the Creative Workspace Supply and

Demand Study concluded that that current provision of dedicated space for creative industries will fall short of supporting current need, and the predicted economic growth for the Greater Cambridge area. It identified a shortage of available, affordable space to support creative industries growth and expansion, particularly for small creative businesses.

Affordability was identified as is a key concern amongst creative industry businesses in the study, with evidence indicating a shortage of affordable workspaces across Greater Cambridge. The study found this particularly affected smaller creative businesses, with the consequence that people were likely to work from home or in other unsuitable set ups.

Several recommendations were made by Simon Poulter Consultants including that investment in new workspace/studio units for creative tech companies and start-ups in the new communities (NE Cambridge, Cambourne, Northstowe, Waterbeach) that meet the practical requirements identified in (their) report be supported.

The 2020 report was followed up by a 2021 study, Greater Cambridge Creative Business and Cultural Production Workspace: Specifications and Practical Requirements Study (LDA Design, June 2021) which also included a survey of businesses, which sought to understand changes to the supply, demand and needs of creative businesses in the Greater Cambridge region as a result of the ongoing Covid-19 pandemic. It also provides additional analysis of the different types of space and specification required by creative businesses.

A majority of respondents to the 2021 study indicated that workspaces available ‘Below Market Value’, for ‘Free Use’ or on a ‘Pay as you Use’ basis were suitable for their needs. In contrast, only a third of respondents indicated that workspaces available at ‘Market Value’ would be suitable. Some respondents indicated that while the cost of workspace was higher in central areas, affordability was a concern across the whole of Greater Cambridge. The report confirmed the continued need for a variety of workspaces for creative businesses on secure, flexible and affordable tenancies that provide certainty over the long-term while being responsive to the needs of individual businesses and new ways of working post-Covid. The important role of workplaces in fostering interaction and collaboration in this sector was also highlighted.

The report highlighted the importance of having planning policies that are supportive of the creative industries and that establish mechanisms for the planning and delivery of dedicated workspace to meet employment, economic growth and cultural objectives. It provides information on the planning policies for creative industries in the London Plan (2021) and highlights the need to ensure that future policies, development allocations and proposals factor-in the needs of creative industry businesses and propose new workspace provision from the outset.

Both the 2020 and 2021 studies found that while there is still a preference for dedicated space within Cambridge, there was a willingness amongst a significant proportion of respondents to locate in dedicated workspaces elsewhere within Greater Cambridge, provided this included good transport connectivity, accessible services, open spaces and proximity to other creatives. The more recent report found that need for more work to raise the profile of the major growth locations at Bourn, North East Cambridge, Northstowe and Waterbeach and work with creative industry sectors to realise their full potential for providing new workspace.

The Simon Poulter report highlights the potential for exploring ‘meanwhile’ use of empty retail units, particularly to support exhibitions of visual art or support creative workspace needs, and to work with developers in the new settlement areas, such Waterbeach, where longer term and meanwhile uses may be possible. The LDA Design report suggested that Local Plan policy could encourage meanwhile uses to support the creative industries, particularly where this can help to build a creative community in advance of permanent facilities being delivered.

Affordable Workspace

The ELR (at paragraph 8.36) defines affordable workspace as workspace that has a rental value below the market rate (generally, 80% of the market rate or less).

The London Plan 2021 defines affordable workspace similarly but adds that it is space …”for a specific social, cultural, or economic development purpose such as

1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises

2) for specific sectors that have cultural value such as creative and artists’ workspace, rehearsal and performance space and makerspace

3) for disadvantaged groups starting up in any sector

4) supporting educational outcomes through connections to schools, colleges or higher education

5) supporting start-up and early stage businesses or regeneration.”. #

It goes on to say that affordable workspaces can be “…provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured in perpetuity or for a period of at least 15 years by planning or other agreements.”

The lower rental rates mean that occupation tends to be feasible for small or start-up enterprises. Therefore, by providing affordable workspace it can help local entrepreneurs and firms to have security and to be protected from rising rents and displacement. The West London Alliance's Affordable Workspace Study highlights the fact that affordability may also be affected by other factors such as 'all in rents', fit-out, shared facilities, lease incentives, sizing etc.

The West London study states that "to be effective, policies need to be adapted to the local context (both in terms of condition of the local market and local policy objectives) and may want to go beyond a Local Plan level to be adapted to the particularities of sub-areas within a local planning authority territory".

Providing spaces on easy-in and on easy-out terms can also help to encourage individuals to take the leap into starting a new business or growing their homebased business. Support from business support providers in these shared spaces can help entrepreneurs to develop sustainable companies.

Affordable workspaces have an important role in helping to address social inclusion. Individuals from more deprived communities will have more barriers to starting up including access to finance and the ability to absorb risk. Access to affordable flexible spaces can help to overcome these issues.

In several areas of London, the provision of affordable workspaces is built into planning policy as a means of addressing shortages in premises for micro, small and medium-sized enterprises. For example, the Tower Hamlets Local Plan requires that "Within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace."

If a Local Plan requires the provision of affordable workspace, a key issue for policy makers is how would it be managed once constructed to ensure that it is sustainable and effective. Unless it needs to expand beyond its existing space, a business moving into an affordable workspace would have no incentive to move on given the lower rents it is paying. Islington requires that 10% of affordable workspace must be included for employment developments over 1,000 m2, leased to the council for a peppercorn rent for 10 years and managed by a council approved Workspace Provider.

London Borough of Hammersmith and Fulham's Affordable Workspace Study prepared by Hatch and Turley consultants summaries the key characteristics that London boroughs have developed as part of their workspace policies and how these policies are used:

- The most common requirement is for 10% of new floorspace in commercial or mixed-use developments to be affordable, although this is higher in some boroughs (e.g. 20% in Havering and Camden);
- Many boroughs typically have a minimum threshold before a development has a requirement for affordable workspace, which is usually at least 1,000 m2;
- The most common discount to market rate is 20%;

- In some places different discounts are applied to different geographies (e.g. in Lambeth it varies between 20% and 50% discount on market rents depending on the geography);
- There is limited detail within policy on how authorities determine ‘local market rents’ against which discounts can be set. This creates difficulties for developers and authorities in setting standards and in creating certainty through the planning process;
- Timescales for the duration of affordable workspace varies from five years to in perpetuity;
- Some boroughs allow the on-site provision of affordable workspace to be mitigated by off-site and cash in lieu payments, particularly where a case can be made for more positive economic impacts for the area;
- Some boroughs (e.g. Lambeth) allow affordable workspace to be offered via discounts to membership models (i.e. virtual offices, fixed desks, hot desks and small offices) throughout a development rather than in a dedicated separate space;
- Islington’s policy allows them to offer heavily discounted space to businesses and organisations that deliver significant social value. Most other boroughs do not ask for such high discounts but may allow developers to offer less space that is more affordable than policy should it be above a minimum stated threshold; and
- Some authorities have approved providers lists and look to proactively build relationships through policy obligations that affordable workspace must be disposed or leased to an approved workspace provider.

9.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

It is proposed to require affordable workspace to be delivered as a proportion of larger commercial developments. Affordable workspace can be defined as workspace that has a rental value below the market rate (generally, 80% of the market rate or less). If on-site provision is not possible, require financial contributions for equivalent off-site provision.

To help new communities develop, major mixed use developments should incorporate an element of affordable workspace. They should also include provision for creative and artists’ workspace, rehearsal and performance space and makerspace.

Reasons for the Proposed Policy Direction

The market has not provided a sufficient supply of small workspaces to meet the demand for such space in Greater Cambridge. Without a policy, this under provision is likely to continue.

Evidence suggests that there is a shortage of affordable workspace for start-up businesses and SMEs across Greater Cambridge. The issue is more apparent and increases further towards Cambridge city centre. Common issues include tenants being priced out of the market, long waiting lists for new space and high rents. As a result, the workspace market in Greater Cambridge can be difficult for micro-enterprises and SME's to enter.

Providing spaces at reduced rents on easy-in and on easy-out terms helps to encourage individuals to take the leap into starting a new business or growing their homebased business. Support from business support providers in these shared spaces can help entrepreneurs to develop sustainable companies.

Affordable workspaces have an important role in helping to address social inclusion. Individuals from more deprived communities will have more barriers to starting up including access to finance and the ability to absorb risk. Access to affordable flexible spaces can help to overcome these issues.

As well as ensuring a sufficient supply of affordable business space, affordable work spaces can support sectors that have cultural or social value such as artists, designer-makers, charities, voluntary and community organisations and social enterprises for which low-cost space can be important.

For Greater Cambridge, the creative sector has been identified as a sector with a particular need for affordable space and with a role in supporting wider community well-being, for example through place-making.

Consultants looking at the supply and demand of creative workspace in Greater Cambridge have highlighted Cambridge's unique character as a historic university town with very few post-industrial buildings and high demand on its current stock of commercial space. This effectively means that there are few affordable spaces for artists and creatives to occupy and practice in.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No Policy - This is not the preferred approach. The market has not provided a sufficient supply of small workspaces to meet the demand for such space in Greater Cambridge. Without a policy, outside the life science sector, this under provision is likely to continue.

9.6 Further Work and Next Steps

The details of the policy, for example the size of the larger commercial developments that it would apply to, the scale of affordable workspace required and whether there will be any requirements in terms of the management of the centres will be worked up for the Draft Plan stage.

10. J/EP Supporting a range of facilities in employment parks

10.1 Issue the Plan is Seeking to Respond to

The success of many of the campuses and business parks in Greater Cambridge is not just down to the employment buildings. They are supported by a mix of other services and facilities which make it possible for workers in business to meet and share ideas, and have access to supporting facilities, such as gyms, cafes and nurseries, that are conducive to a high quality, healthy working environment.

The provision of onsite amenities can also reduce the negative impacts generated by an employment site. It can help to manage peak hour travel by staggering the arrival and departure of workers. This helps to ease congestion and improve air quality as well as reducing the pressure on private and public transport infrastructure.

10.2 Policy Context

National Context

The National Planning Policy Framework (2021) paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 82 describes how planning policies should:

- seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances

Paragraph 85 states that where sites to meet local business and community needs in rural area are adjacent to or beyond existing settlements, and in locations that are not well served by public transport, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable.

Regional / Local Context

Regional / local policies relevant to this issue have not been identified.

Adopted Local Plans

South Cambridgeshire Local Plan 2018 policy E/10: Shared Social Spaces in Employment Areas permits appropriately scaled leisure, eating and social hub facilities in business parks and employment areas where the use: is ancillary or complementary to existing or proposed B-Use Classes, and supports the functionality of the employment area; will not have unacceptably adverse effects on existing businesses or future business use of the site; is intended primarily to meet the needs of workers in the business park, and does not attract significant levels of visitor traffic into the area.

Cambridge Local Plan Policy 40 Development and expansion of business space states that development of larger employment sites, with multiple occupiers, should consider whether they want to provide shared social spaces within the site, to enhance the vitality and attractiveness of the site.

10.3 Consultation and Engagement

In our First Conversation consultation we asked you a range of questions focused on the local economy.

We had some responses that suggested that the Plan should support the provision of shared spaces within employment areas. Suggestions included co-working spaces, cafes, cycle facilities and changing rooms and electric bike parking.

10.4 Evidence Base

The Greater Cambridge Employment Land and Economic Development Evidence Study, November 2020 (GLHearn with Iceni Projects Ltd, SQW and Cambridge Econometrics) identified various factors influencing the spatial distribution of key sectors in Greater Cambridge. Access to amenities was identified as a secondary but increasingly important consideration influencing the locational decision making of businesses.

The consultants provide the example of the gaming sub sector which, stakeholders suggested, is leading the trend with some businesses investing in quality floorplan finishes and on-site amenities to retain employees and attract new labour. The report concludes that ensuring employees have access to quality amenities is critical for small to medium sized businesses in this sector as they are competing with what multinational corporations such as Microsoft, Amazon and Apple can provide.

Examples of employment sites across Greater Cambridge where shared facilities are provided included:

- Granta Park (Great Abington) with a fitness and wellbeing centre, a nursery, restaurant and a sports club.

- Babraham Research Campus offering a nursery on site and a sports club.
- Cambridge Research Park (Landbeach) offering fitness classes, a café and dry-cleaning services.

The report also goes on to list other parks with limited amenities. It highlights Cambourne Business Park where it says take up has proven to be a protracted process. The consultants suggest the provision of a mix of localised amenities, such as a gym and restaurant, would improve the competitiveness of the Park.

The Cambridgeshire and Peterborough Independent Economic Review (CPIER) report highlights that market and non-market relationships are one the three main components of successful business and innovation systems and the lack of effective networking may inhibit the flow of information about new or emerging opportunities and technologies and business models. This, it goes on to say, may also prevent the development of mutual support systems which encourage new business formation and the development of existing firms.

The CPIER report also highlights the importance of healthy workplaces to productivity. It describes workplaces as key settings for improving people's mental and physical health, as well as their well-being.

10.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed policy direction, as set out in the First Proposals report is as follows:

Support appropriately scaled leisure, eating and social hub facilities where they support the functioning of an employment area, and they are primarily aimed at meeting the needs of workers on site and help to manage the transport impacts of the development.

Reasons for the Proposed Policy Direction

The success of many of the campuses and business parks in Greater Cambridge is not just down to the employment buildings. They are supported by a mix of other services and facilities which make it possible for workers in business to meet and share ideas and have access to supporting facilities that are conducive to a high quality working environment. They also have the benefit of helping to manage the peak arrival and departure of workers travelling to and from the site, helping to improve air quality and ease congestion and pressure on infrastructure.

At the same time these facilities should not be so extensive that they threaten the viability of nearby district or local centres.

With the implementation of the Planning Use Class E, which provides greater flexibility between uses, such a policy is less necessary, but we think that making our employment parks high quality, healthy environments for workers and visitors is such a key issue it remains an important element of the plan.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy – This is not the preferred approach, due to the need to support these ancillary facilities to make our business parks and campuses more effective.

10.6 Further Work and Next Steps

Subject to consultation, the next steps would be to develop a detailed policy.

11. J/RC Retail and Centres

11.1 Issue the Plan is Seeking to Respond to

Town and villages centres are at the heart of communities, and the local plan needs to take a positive approach to their growth, management and adaptation.

A key aspect of sustainable communities is good access to shops and other local services which help meet the day-to-day needs of the local communities. It is therefore important that both new and existing communities have easy access to facilities, including during the construction phase to reduce the need for residents to travel and, maintain vibrant and viable centres.

Cambridge's city centre provides the majority of the city's floorspace for both retail and commercial leisure activities. As such, for both local people and visitors to the area, it is an important destination for shopping, tourism, cultural, arts and recreational pursuits and serves as a regional destination for retail, arts and other leisure activities. The broad range of services and facilities already provided in and around the city make an important contribution to the vibrant and diverse character of the city and its charm as a place to inhabit and visit. At a more local scale, the various district, neighbourhood and local centres distributed around the city and in the district provide a range of local services and community facilities that serve the day-to-day needs of residents and local workers.

Village shops and other rural centres provide a range of useful shops and local services which help people to meet their day-to-day needs. In addition, these local shops and services are also an important source of local employment and social interaction. They reduce the need for people to travel to access them and help retain their sense of community. It is therefore important that they retain their utility and diversity to support local people and their sense of community.

11.2 Policy Context

National Context

Paragraph 20 of the National Planning Policy Framework (2021) requires local authorities to make sufficient provision for, amongst other uses, retail and leisure.

Paragraph 53 states that Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area. Similarly, planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.

Paragraph 86 highlights the means of ensuring the vitality of town centres by taking a positive approach to their growth, management and adaptation. Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability. This can be achieved by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing for a suitable mix of uses (including housing) reflecting their distinctive characters. Policies should define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

Paragraph 86 goes on to explain how a suitable range of sites should be allocated in town centres to meet the scale and type of development likely to be needed. Town centre boundaries should be kept under review where necessary to meet the anticipated needs for retail, leisure, office and other main town centre uses over a ten-year period. Policies should recognise that residential development can play an important role in ensuring the vitality of centres and encourage residential development on appropriate sites

In the Glossary of the NPPF, Annex 2 the definition of Main town centre uses includes retail, leisure, entertainment and more intensive recreation uses including cinemas, restaurants, bars and nightclubs, amongst other uses. The definition of a Primary shopping area is a defined area where retail development is concentrated.

National Planning Policy Guidance elaborates on the NPPF's definition of town centres as a place where main town centre uses are concentrated including city and town centres, district and local centres (and so includes places that are often referred to as high streets). It also explains the 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.

Consideration for a wider range of complementary uses can, if suitably located, help support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. The same is true of temporary activities such as 'pop ups', which will often benefit from permitted development rights. Residential development can also play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services.

Evening and night time activities also 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.

The guidance also outlines what a town centre strategy may contain, based on evidence of the current state of town centres and the opportunities that exist to accommodate a range of suitable uses to support their vitality and viability. In terms of retail, strategies can be used to establish: the realistic role, function and hierarchy of town centres over the plan period; the vision for the future of each town centre, including the most appropriate mix of uses to enhance overall vitality and viability; the ability of the town centre to accommodate the scale of assessed need for main town centre uses, and associated need for expansion, consolidation, restructuring or to enable new development or the redevelopment of under-utilised space; and how existing land can be used more effectively by grouping complementary activities into hubs.

When there is a need to assess proposals for out of centre development, the Guidance describes and explains how the sequential test should be applied. It supports the viability and vitality of town centres by focussing main town centre uses (defined in the NPPF) towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre).

The Guidance explains how the sequential approach, in plan-making requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected. The Guidance provides a checklist of the matters that need to be considered when using the sequential approach as part of plan-making. In summary, these include an assessment of the need for main town centre uses and if the town centre can accommodate the identified need for main town centre uses. If the additional main town centre uses required cannot be accommodated on town centre sites, the next sequentially preferable sites that they can be accommodated on.

The Guidance also notes the use of the sequential test should recognise that certain main town centre uses have market and locational requirements which mean that they may only be accommodated in specific locations.

The Guidance provides detailed advice on the purpose and application of an impact test as part of the decision-making process for large retail and leisure located outside existing town centres. They may also be used by the plan making process in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centre.

Regional / Local Context

Assessment of Student Housing Demand and Supply for Cambridge

Adopted Local Plans

The Cambridge Local Plan 2018 includes: Policy 6: Hierarchy of centres and retail capacity; Policy 10: The City Centre; Policy 72: Development and change of use in district, local and neighbourhood centres; and Policy 73, Community, sports and leisure facilities.

Policy 6: Hierarchy of centres and retail capacity outlines the hierarchy of centres in Cambridge along with the circumstances when a sequential approach and, or impact assessment are required. It also explains the amount of retail capacity that is needed to be provided and where this should be delivered.

Policy 10: The City Centre ensures that Cambridge City Centre is the primary focus for developments attracting a large number of people and for meeting retail, leisure, cultural and other needs appropriate to its role as a multi-functional regional centre. Particular focus is also given towards retail, leisure and other mixed uses at the Fitzroy/Burleigh Street/Grafton Area of Major Change, under Policy 12.

Policy 72: Development and change of use in district, local and neighbourhood centres controls new A1 (shop) uses and other uses in Cambridge’s district, local and neighbourhood centres explaining when these will be permissible including the uses suitable on ground floors and those above.

Policy 73: Community, sports and leisure facilities explains the requirements for new or enhanced facilities will be supported, including new city-wide or sub-regional facilities. The policy also explains the circumstances that need to be satisfied for either the replacement or loss of a facility or site. It also references the extensive marketing guidance, provided in Appendix K of the Local Plan which needs to be followed for any marketing exercise that may be required to prove the site is no longer needed.

South Cambridgeshire Local Plan (2018) includes: Policy E/21: Retail Hierarchy; Policy E/22: Applications for New Retail Development; Policy E/23: Retailing in the Countryside; and Policy SC/3: Protection of Village Services and Facilities.

Policy E/21: Retail Hierarchy outlines the hierarchy of centres in South Cambridgeshire and supports retail proposals of scale commensurate to the centre’s position in the hierarchy.

Policy E/22: Applications for New Retail Development explains the circumstances when new shops within a village will be supported and refused. Dependent on the location and proposed size of the new shop, a Retail Impact Assessment may be required.

Policy E/23: Retailing in the Countryside explains the exceptional circumstances when new shops in the countryside will be permitted.

Policy SC/3: Protection of Village Services and Facilities explains how proposals involving the loss of a village service leading to an unacceptable reduction in community or service provision will be refused planning permission. The policy lists a range of matters that will be considered when determining the significance of the loss. These include: the importance of the use's existing contribution to the social amenity; the availability of alternative village services and facilities; and the use's future economic viability and the outcome of a 12-month marketing exercise at a realistic market price. The policy applies to an extensive list of village services.

11.3 Consultation and Engagement

Key feedback we received through the First Conversation consultation included support for the location of a range of shops, services and facilities in central areas including alternative uses to retail, in response to changing consumer habits. These alternative uses included more leisure, residential and office uses. There was also support for allowing more independent retail stores, small retail units and businesses into these areas. Other comments included improving high streets to make them more attractive to visitors and allowing greater flexibility to support tourism.

Objections were raised about allowing the development of out-of-town shopping areas and to allowing flexibility for changes of use in Cambridge City Centre. These alternative uses could have a detrimental impact on the character of these areas.

In April/May 2021, additional stakeholder engagement with Cambridge's three shopping centres (Lion Yard, Grand Arcade and the Grafton Centre) was undertaken to better understand their future growth ambitions including the impact of Covid-19. Given the impact of lockdowns and rise increase in online shopping, over a short space of time, it was considered the timeliest means of gaining a better understanding of Cambridge's high street resilience. Each centre was asked to submit a short statement about the national and local retail market, how future retail local planning policy should evolve, their current performance compared to before the pandemic and how the shopping centres and the city centre may need to evolve to respond to changes in the retail market and consumer habits. A summary of their key comments is listed below. The joint and individual statements are provided in Appendix 2. It should be noted the Grafton Centre did not submit any comments:

Retail environment – current national trends

The impact of the pandemic has accelerated and decelerated a number of existing trends including: increased focus on localism; greater commitment to small (local) independent businesses; the development of re-commerce and independent fashion operators in response to fast fashion and environmental concerns; more focused shopping trips; more value placed on the self and socialising rather than consumerism; increased number of Company Voluntary Agreements - legally binding agreement with a company's creditors to allow a proportion of a debt to be paid back over time; and an oversupply of retail space.

The department stores that continue to operate, are being underpinned by preferential commercial terms by landlords to enable such large retail operators to operate. Furthermore, retail agents are also reporting the following trends in demand for space in shopping centres due to recent changes. These include an increase in NHS/GP surgeries; more office space; new leisure concepts; last mile logistics; dark kitchens (with moped access); student accommodation; and hotels.

Cambridge Retail Market

While Cambridge has historically benefitted from low vacancy rates, these rates have increased. The significant reduction in tourists/students throughout the pandemic has had an impact on the city centre resulting in reduced revenue/footfall. Travel, car parking and the associated high parking costs, continue to be significant issues for customers, visitors and staff.

The recent announcement of the Grafton Shopping Centre being put up for sale and the indication that it may be converted to alternative uses, highlights the difficulties of the retail market in Cambridge. This further strengthens the importance of the historic core as the centre for retail and leisure uses that drive footfall and provide the entertainment core for the city centre.

Future Retail Local Planning Policy

In summary, the key matters for both Aberdeen Standard Investments (ASI) representing Lion Yard and Universities Superannuation Scheme Ltd (USS) representing Grand Arcade are as follows:

- Flexibility to react to and embrace change.
- The ability to provide a mix of uses to attract visitors to the town centre beyond retail such as food, leisure, entertainment, office, hotels, residential etc.
- The use of data to monitor, inform and embrace changes in retail.
- Recognition that Cambridge's retail environment is changing with long lasting implications on the shopping centres and their future plans.
- The need for a reactive and flexible planning environment.

Shopping centre performance compared to before the pandemic.

Lion Yard:

- Lion Yard has been impacted by the pandemic.
- Increasing number of vacancies at Lion Yard with a lack of occupiers looking for mid-sized units.

- First floor of Lion Yard has historically been harder to let as a result of lower footfall.
- Tenants are looking to pay less rent, have rent fixed to a percentage of income and have shorter leases which has implications on the viability of the shopping centre.
- Rents have already decreased; however, business rates remain high.
- The loss of tourist and student spend in Lion Yard has impacted occupiers.

Grand Arcade:

- Grand Arcade has been negatively affected by the pandemic.
- The number of vacancies has notably increased from 2% in January 2020 to 13% in January 2021.
- Retailers who have performed the best in lockdown are discounters, convenience and home improvement retailers. Bricks and mortar fashion retailers have been significantly disrupted by the further growth in online shopping and the pandemic.
- Footfall is still about 40% behind 2019 levels. However, shoppers have a higher sales conversion rate (30%) compared to pre-pandemic rates (10%). This implies shoppers have made a specific trip to spend rather than just browse.
- Many of the retailers within Grand Arcade have, as a result of the pandemic, been subject to CVAs or have gone into administration.
- The pandemic has accelerated the changes in the retail market, by approximately ten years. There is a requirement for fewer stores, downward pressures on rent, shorter leases, increased capital expenditure needed from landlords to attract the best retailers and retail destinations becoming more multi-purpose (increasing polarisation between prime retail locations and the rest).

How may shopping centres need to evolve in response to Covid-19, changing consumer habits and changes to the planning system?

Lion Yard:

- Lion Yard has been responding to the changes in retail. Over the years it has evolved to provide everyday convenience retail. ASI has also looked to diversify the mix of uses in Lion Yard.
- The upgrading and change of use of underperforming space is essential if the city centre is to continue to thrive. Limited flexibility to change uses in line with consumer demand, will mean the city centre will not be able to adapt to the fundamental shift in the retail market.
- The city centre needs to provide a wide array of experiences and uses to complement retail to draw people into the city.
- The flexibility to be able to meet the needs of the community and curate the
- shopping centre experience is essential to ensure its longevity.

Grand Arcade:

- A fundamental change to shopping centres will be to move towards a wider variety of uses and services. Shopping centres will not be able to rely on their traditional function of being anchored by fashion occupiers, particularly with the decline of the department store.
- Each shopping centre must respond to the local market conditions, local stakeholders and requires flexibility to adjust to the changing market conditions. There are lots of recent examples of the re-purposing of department stores:
    - Debenhams at Highcross;
    - University of Gloucester re-purposing Debenhams into a teaching campus;
    - Debenhams, Orchard Street, Leeds – flexible office space and student accommodation; and
    - Queensgate, Peterborough- repurposing of upper floors for a cinema.
- Grand Arcade is reviewing their tenant mix and responding to retailer demand (or lack thereof). It is likely there will need to be an increasing mix of non-retail uses within the shopping centre to drive footfall in the long term.
- It will need to provide entertainment and experiences to be able to compete with online shopping and draw visitors in the city centre. If Grand Arcade does not respond or is restricted in its ability to be flexible to different uses that will provide a differentiator, it will not be able to adapt to the changing retail market.

How do you think the city centre should evolve / adapt including changes to the planning system?

Lion Yard:

- The key to ensuring the success of Cambridge City Centre is flexibility. This is a necessity to monitor (through real time data), address and embrace change. Planning policy also needs to embrace flexibility to address future changes to the planning system.
- The requirements of the local community as well as wider visitors to Cambridge, including tourists and business users, need to be built into any future plan.
- The necessary and accelerated trend of working from home has resulted in more people shopping local and using facilities, whether that is retail or spaces within city centres. Their vision for the future of the city centre needs to be taken into account as they are the ultimate users of the space.

Grand Arcade:

- In order to create a successful city centre that caters for both the local population, students and tourists, the city centre should adapt to provide a variety of uses, both day and night-time economies by increasing the residential, office and leisure offer.
- Retail should be focused in the historic core to survive. The surrounding service centres should not compete with the historic core.
- The city centre needs flexibility to respond to the changing environments both now and in the future.
- The retail environment needs to be regularly monitored and analysed through the collation of up-to-date data that gives real time information on how the city centre is performing.
- Given the speed of change and the longevity of the proposed Local Plan, it should recognise that in the long term the amount of retail may decrease within Cambridge City Centre as the mix of uses increases. This would allow for the right size and amount of retail supported by a strong alternative offer that attracts visitors to the city centre.
- Retail agents note far more detailed in their analysis of where a physical store is located and local parking rates, access for staff and a commercially supportive Local Planning Authority all have a bearing on where new stores will be located.
- In terms of the City's transport strategy, there needs to be a strong focus on resolving existing pressures, particularly around car parking and the preference for the private car.

11.4 Evidence Base

The Greater Cambridge Retail and Leisure Study

The Councils' commissioned a Retail and Leisure Study in September 2019, covering the whole of Greater Cambridge to update our 2013 study. The first part of the updated study involved the development of a baseline position, to analyse the health of each centre as well as travel and expenditure patterns in pre-Covid 'normal' times. All the data collection, survey work and on-site audit data was collected before the start of the Covid-19 pandemic.

The introduction of 'lockdown' measures and social distancing in March 2020 included the closure of all but essential shops and services. This had an immediate impact on high streets, with town centre businesses unable to trade and no timeline in place for re-opening. The longer-term impact of Covid-19 on wider society and our high streets remains uncertain, but it is widely accepted that town centres will 'bounce back', but pre-Covid trends and challenges will accelerate the rate of change in respect of operator line-up and composition, and – in many cases – contraction.

The progress of the study through to completion was intentionally slowed to allow a considered and informed approach to forecasting over the plan period as a consequence of the Covid-19 pandemic. This approach has enabled the consideration of new and up-to-date published commentary in respect of economic scenarios, cultural shifts, commercial pressures and opportunities, and the implications for our high streets.

The Study forecasts future retail need using Experian trend line population growth. These projections are split between convenience goods, items bought quickly and frequently and comparison goods, higher value, non-perishable items, purchased less frequently. It should be noted this forecasting is based upon Experian trend line population projections. This follows the standard methodology for developing a Retail and Leisure Study update, based upon existing planned growth, as part of the baseline section. It does not reflect the retail growth needs to support the proposed quantum and location of growth in the First Proposals document. This will be developed as the second section of the Study to inform the Greater Cambridge Local Plan at the draft plan stage.

For convenience goods, on the basis of current market share and forecast growth in population and expenditure, the Study (baseline report) identified capacity to support around 2,000-2,500 m2 net of convenience goods. It should be noted there is already a substantial amount of new retail/town centre floorspace committed across Greater Cambridge throughout the strategic growth areas. Many of these are 'local centres' and have not been factored into the need assessment because they will be self-supported by new housing and population growth. The two 'district centres' at

Northstowe and Waterbeach are intended to provide larger anchor foodstores, which – like Eddington – will draw trade from a wider catchment area and divert some trade from existing foodstores. These two foodstores are located within the largest strategic growth areas, with the largest levels of planned and committed retail floorspace.

In terms of comparison goods, the Study indicates, based on the current market share of the city centre and out-of-centre retail provision a baseline capacity to support approximately 4,300 m2 net of comparison goods floorspace by 2030 and dropping to 4,200 m2 net by 2035. The increase in population and expenditure is not sufficient to out-pace expenditure claims in the form of online shopping and existing floorspace improving their business efficiency, para 9.62 baseline Study.

The Study concluded Cambridge city centre continues to be the most dominant comparison-goods shopping destination in Greater Cambridge and the wider sub-region, achieving an overall market share of 53.7%. The city's market share remains almost unchanged since the previous 2013 study. In the context of a falling comparison goods floorspace and growth in population and expenditure to the period 2020, the city's performance sales density has experienced a strong increase from £7,497 per m2 net in 2013 to £12,539 per m2 net in 2020.

In terms of future policy direction, while Cambridge city centre remains a thriving regional centre providing a wide range of uses including shopping, leisure and tourist related activities, it is important that the centre is able to evolve in a way that supports changing consumer, retail and leisure habits while retaining its vibrancy and appeal, by continuing to provide for the needs of those living, working and studying in the city.

The Study's data demonstrated the important role of smaller local convenience stores throughout the network of village settlements, achieving strong market shares in their location zones. It is therefore important that these village/ rural/ local centres provide people with continued access to a range of shops and services which help them to meet their day-to-day needs. 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.

It is essential for all future growth to consider the need to provide new or additional shops and services in new or existing centres, to create healthy and sustainable communities. To sustain their vibrancy and vitality, growth should be directed towards new and existing centres. This means out of town development proposals - development outside a new or planned centre – will need to consider their impact on these centres, to ensure they do not undermine their ability to serve their local community.

The introduction of a new Use Class (Class E – Commercial, Business and Service) into national planning policy means some use changes no longer require planning permission. This means that some changes can be made potentially without planning permission, such as shops becoming financial services, offices, or even light industrial uses. There are also simplified processes in place for some other changes, such as small shops changing to residential uses. Future policies will need to adapt to these changes. It is the intention for future policies to continue to protect the vitality and vibrancy of all designated centres.

The Greater Cambridge Retail and Leisure Study – Large Site Retail Need to 2041

Initial calculations for additional retail need, based upon the proposed development outlined in the Greater Cambridge Local Plan development strategy are provided below. These are based on assumptions regarding how much development is anticipated to 2041.

For ‘Convenience’ goods - items bought frequently and quickly without too much thought - two scenarios have been used to provide minimum (30%) and maximum (70%) ranges, based upon sales retention rates (the % of localised sales).

- A convenience retention of 30% of spend assumes only localised top-up shopping provided. This could be a small top-up convenience store such as Tesco Express, Co-Op etc (c.150-200 m2 net). Other convenience units would be around 100 m2 gross.
- A convenience retention of 70% of spend assumes a greater proportion of food shopping is undertaken ‘on-site’ in a larger medium-large sized foodstore (c.800-1,000 m2 net). Other convenience units would be around 100 m2 gross.

The calculations for each large-scale development and retention scenarios for convenience is provided below, in Table 12.4.1.

Convenience Goods	NW Cambridge	NE Cambridge	Cambridge East	Cambourne
Population to 2041	2,600	8,400	7,400	5,600
Percentage of full build-out	68%	47%	41%	20%
Spend Generated (2030) £m	5.0	16.2	14.3	10.8
Convenience Retention Rate (30%) £m	1.5	4.9	4.3	3.2

Floorspace (@ £10,000 / m2 net) m2 Net	151	487	429	325
Floorspace (@ £12,000 / m2 net) m2 Net	126	406	358	270
Convenience Retention Rate (70%) £m	3.5	11.3	10.0	7.6
Floorspace (@ £10,000 / m2 net) m2 Net	352	1,136	1,001	757
Floorspace (@ £12,000 / m2 net) m2 Net	293	947	834	631

Table 12.4.1: Convenience goods need for proposed large-scale developments to 2041.

For 'Comparison' goods – higher value, non-perishable items, purchased less frequently. A retention rate of 20% trade is assumed. This is based upon most expenditure is either via online shopping or larger centres, primarily in Cambridge City Centre and other local, out-of-centre retail parks. The calculations for each large-scale development for comparison shopping is provided below, in Table 12.4.2.

Comparison Goods	NW Cambridge	NE Cambridge	Cambridge East	Cambourne
Population to 2041	2,600	8,400	7,400	5,600
Percentage of full build-out	68%	47%	41%	20%
Spend Generated (2030) £m	9.5	30.5	26.9	20.4
Comparison Retention Rate (20%) £m	1.9	6.1	5.4	4.0
Floorspace (@ £10,000 / m2 net) m2 Net	473	1,527	1,346	1,018
Floorspace (@ £12,000 / m2 net) m2 Net	315	1,018	897	679

Table 12.4.2: Comparison goods need for proposed large-scale developments to 2041.

From these calculations and the finding of the baseline Study, the initial approach for the delivery of these needs, in the large-scale developments, is as follows:

North West Cambridge

- The additional housing will only generate demand for a small top-up convenience store such as Tesco Express, Co-Op etc (c.150-200 m2 net) and 400 m2 of comparison floorspace.
- As outlined in the baseline Study, para 9.22 "Sainsburys Eddington…. Performance is likely to improve as further phases are completed, the store becomes more established, and when adjoining retail units are fully occupied and open." and 9.29 "Based on a convenience goods floorspace of 1,600sq m net, we estimate that the store has an average convenience goods sales density of £6,063 per sq m net, compared to company average levels of £12,191 per sq m net. ". These findings indicate the foodstore can double its current sales and its current under-performance is in part due to Eddington still being under construction. It may therefore be more appropriate to concentrate foodstore provision in the existing planned centre. Similarly, comparison need will most likely be provided in the district centre in order to support the existing retail units.

North East Cambridge

- In line with the North East Cambridge's ambition to be an inclusive, walkable, low-carbon new city district, the site aims to provide a wide range of shops and services to meet the needs of its residents. It is therefore reasonable to plan for foodstore capacity using the high retention rate of 70%. This equates to a need of approximately 1,000m2. This provision will be spread around the proposed district and local centres.
- The identified comparison floorspace needs (between 1,000 and 1,500m2) will primarily be located at the district centre and across the local centres. The NEC Retail Statement 2021 [link] explains how the development's retail needs will be provided.

Cambridge East

- Assuming an average retention rate of 50%, Cambridge East will need to provide at least 650 m2 of foodstore floorspace. This would normally include a combination of different foodstore formats.
- The identified comparison floorspace needs (approximately 1,100 m2) could be provided in a new district centre along with the foodstore.

Cambourne

- Assuming an average retention rate of 50%, Cambourne will need to provide at least 500 m2 of foodstore floorspace. This would normally include a combination of different foodstore formats.
- The identified comparison floorspace needs (approximately 850 m2) could be provided in a new centre along with the foodstore.

The Greater Cambridge Retail and Leisure Study – Large Site Retail Need to full build out.

Separate calculations for additional retail need, based upon the proposed development outlined in the Greater Cambridge Local Plan development strategy are provided below, in Table 12.4.3. They are based on assumptions regarding full build out of developments. As Cambourne is long-term broad location, with the majority scheduled to be built beyond 2041 this section will focus on the remaining sites which are expected to be in advanced stages of development

Convenience Goods	**NW Cambridge**	**NE Cambridge**	**Cambridge East**
Population (at full build)	3,800	18,000	17,900
Spend Generated (2030) £m	7.3	34.7	34.6
Convenience Retention Rate (30%) £m	2.2	10.4	10.4
Floorspace (@ £10,000 / m2 net) m2 Net	220	1,043	1,037
Floorspace (@ £12,000 / m2 net) m2 Net	184	869	865
Conv. Retention Rate (70%) £m	5.1	24.3	24.2
Floorspace (@ £10,000 / m2 net) m2 Net	514	2,434	2,421
Floorspace (@ £12,000 / m2 net) m2 Net	428	2,029	2,017

Table 12.4.3: Convenience goods need for proposed large-scale developments.

The calculations for each large-scale development for comparison shopping is provided below, in Table 12.4.4. They are based on assumptions regarding full build out of developments.

Comparison Goods	NW Cambridge	NE Cambridge	Cambridge East
Population (at full build)	3,800	18,000	17,900
Spend Generated (2030) £000	13,821	65,467	65,103
Comparison Retention Rate (20%) £000	2,764	13,093	13,021
Floorspace (@ £10,000 / m2 net) m2 Net	691	3,273	3,255
Floorspace (@ £12,000 / m2 net) m2 Net	461	2,182	2,170

Table 12.4.4: Comparison goods need for proposed large-scale developments.

From these calculations and the finding of the baseline Study, the initial approach for the delivery of these needs, in the large-scale developments, is as follows:

North West Cambridge

- The additional housing will only generate demand for a small top-up convenience store such as Tesco Express, Co-Op etc (c.150-200 m2 net) and 400 m2 of comparison floorspace.
- As outlined in the baseline Study, para 9.22 "Sainsburys Eddington…. Performance is likely to improve as further phases are completed, the store becomes more established, and when adjoining retail units are fully occupied and open." and 9.29 "Based on a convenience goods floorspace of 1,600m2 net, we estimate that the store has an average convenience goods sales density of £6,063 per m2 net, compared to company average levels of £12,191 per m2 net. ". These findings indicate the foodstore can double its current sales and its current under-performance is in part due to Eddington still being under construction. It may therefore be more appropriate to concentrate foodstore provision in the existing planned centre. Similarly, comparison need will most likely be provided in the district centre in order to support the existing retail units.

North East Cambridge

- In line with the North East Cambridge's ambition to be an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces, site aims to provide a wide range of shops and services to meet the needs of its residents. It is therefore reasonable to plan

- for foodstore capacity using the high retention rate of 70%. This equates to a need of at least 2,000m2. However, to avoid the need for car parking provision which large foodstores often require, this provision will be spread around the proposed district and local centres. The largest foodstore might be between 600-800m2 in size. This will also avoid attracting people from outside the area by car.
- The identified comparison floorspace needs (approximately 2,200 m2) will primarily be located at the district centre and across the local centres. The NEC Retail Statement 2021 [link] explains how the development's retail needs will be provided.

Cambridge East

- Assuming an average retention rate of 50%, Cambridge East will need to provide at least 1,400 m2 of foodstore floorspace. This may include a combination of different foodstore formats. However, this would normally include at least one large foodstore, approximately 1,200 m2 in size. This is the same size as the Aldi foodstore on Newmarket Road. Two smaller top-up convenience foodstores (approximately 200 m2 in total) will also be needed. Many of these shops would most likely be provided in a new district centre.
- The identified comparison floorspace needs (approximately 2,700 m2) could be provided in a new district centre along with the foodstore.

Cambourne

- Provision will depend on the actual size of development planned at this broad location. This would normally include a combination of different foodstore formats and some comparison shops and services

11.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

We will update our policies regarding retail, leisure (arts, culture and entertainment) and centres to adapt to the changing retail environment but also changes in national planning policy regarding Use Class E which reduce control over changes between certain uses.

The Greater Cambridge Local Plan will:

- Support the retention of retail and leisure uses with the revitalisation of high streets. This includes encouraging small-scale units, to attract independent shops, leisure activities and small businesses to help diversify and improve the appeal of the high street as well as allowing local communities to meet their day-to-day needs with village shops and services.

- Seek to develop a specific approach for Cambridge city centre including its shopping centres. These will need to recognise the likely pressure for change. Through development of future guidance, the Council would seek to work through the issues with landowners with the objective of achieving vitality and vibrancy for these important parts of the City.
- Where planning permission is required, continue to resist the loss of retail or other town centre uses in primary shopping areas where it would undermine the vitality of centres, and require proposals to support the character, safety, and vibrancy of existing centres and village high streets.
- Establish a hierarchy of centres across Greater Cambridge including rural village shopping areas. Proposals for new and existing shops and related high street services, will be guided towards these centres first, followed by edge of centre locations. If neither of these are locations are available, then out of centre locations will be considered with a preference for those most accessible to a centre.
- New communities will be required to include new centres of appropriate scales to be created to meet the day to day needs of local communities.

Reasons for the Proposed Policy Direction

It is important we continue to support the role and function of our high streets and at the same time recognise that they need to be able to adapt to allow for their revitalisation. To do this we need to allow them to provide a broader range of shops and services and other complementary uses. These may include small-scale units to attract independent shops and small businesses as well as encourage more leisure activities. These changes will allow the high street to adapt to changing consumer trends and the way people will use these centres. It is also important that rural settlements provide a range of village shops and services to allow local communities to meet their day-to-day needs.

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. These related uses generate significant economic benefits for the city as well as providing an important source of employment. It is therefore essential to support the city centre including its shopping centres, in a way that allows it to adapt to changing consumer trends, while retaining its vitality and vibrancy alongside its regional function.

The policy will establish a hierarchy of centres across Greater Cambridge including rural village shopping areas. Proposals for new and existing shops and related high street services, will be guided towards these centres first. This approach will promote the long-term vitality and viability of these centres.

Where planning permission is required, shops and services will be protected from conversion to alternative uses. This should ensure people will be able to continue to access local services to meet their day-to-day needs.

When planning permission is required, the proposed qualitative approach will help ensure new development proposals wanting to establish themselves on the high street support the character, safety, and vibrancy of existing centres and village high streets. With changing consumer habits and commuter patterns, it is important that new and existing centres respond in a way that retains their relevance and appeal in people's day-to-day lives. This means development proposals in city centre locations and other important high streets make a positive contribution to their local area to support the vibrancy and vitality.

In new communities, it is important that large-scale developments provide a range of new shops and local services, proportionate in size for people to meet their day-to-day needs. These local amenities not only help create local employment opportunities and provide opportunities for social interaction among new residents, but they also reduce the need for local people to have to travel to access these services. Perhaps, most importantly these facilities help foster a sense of local identify and community as well as improve social cohesion and community resilience at an early stage of the new development.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

To not include a policy - Not considered a reasonable alternative as the Councils' consider this policy is needed as the considerations for the different centres along with the shops and services they provide are essential to supporting their long-term vitality and vibrancy.

11.6 Further Work and Next Steps

The Greater Cambridge Retail and Leisure Study

The Greater Cambridge Shared Planning Service have commissioned The Greater Cambridge Retail and Leisure Study to support the review of the joint Local Plans for Cambridge and South Cambridgeshire. The study comprises of two sections. The first comprises of a baseline report to provide a review of current retail and leisure provision in Greater Cambridge. This is now complete.

The second section will inform the Greater Cambridge Local Plan. It will include the dentification of retail and leisure needs including the needs of strategic developments and outline the revised hierarchy of centres for Greater Cambridge.

Given the on-going impact the pandemic is having on people's shopping habits and the limited re-opening of foreign travel, the Councils have adopted a pragmatic approach towards their retail planning. The Councils have engaged with Cambridge's shopping centres to better understand how future retail and city centre policies can support the role and function of both Cambridge city centre and other centre locations. This engagement will continue through the development of the Greater Cambridge Local Plan. We have produced some interim research to inform First Proposals, but will complete a full retail study at draft plan stage, giving an additional period for the retail picture to stabilise before we prepare the detailed study.

For reference, National planning guidance under section 'What can a town centre strategy contain?', [Paragraph: 004 Reference ID: 2b-004-20190722] recognises the uncertainty associated with forecasting long-term retail trends and consumer behaviour. Retail strategies may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed.

The baseline Study forecasts future retail need using Experian trend line population growth. It identified capacity to support around 2,000-2,500 m2 net of convenience goods between 2020 to 2030. This factored in the planned foodstores to support existing growth. In terms of comparison goods, the Study indicates, based on the current market share of the city centre and out-of-centre retail provision a baseline capacity to support approximately 4,300 m2 net of comparison goods floorspace by 2030 and dropping to 4,200 m2 net by 2035. The increase in population and expenditure is not sufficient to out-pace expenditure claims in the form of online shopping and existing floorspace improving their business efficiency, para 9.62.

By comparison, the adopted Cambridge Local Plan (October 2018), in Policy 6: Hierarchy of centres and retail capacity identified a capacity to support 14,141 m2 net of comparison retail floorspace between 2011 and 2022. 12,000 m2 of this figure was allocated to the Fitzroy/Burleigh Street/Grafton Area of Major Change, under Policy 12 of the adopted Cambridge Local Plan (October 2018). The new figure of 4,300 m2 for Greater Cambridge to 2030 highlights how the demand for this type of floor space has decreased.

Retail needs for Greater Cambridge to 2041, taking into account the proposed development strategy, will be calculated to inform the Greater Cambridge Local Plan, including any specific allocations to support this need.

12. J/VA Visitor Accommodation, Attractions and Facilities

12.1 Issue the Plan is Seeking to Respond to

Tourism is important sector for the Greater Cambridge economy. It is estimated that the total value of tourism to the area in 2018 was over £1 billion and that in the same year it provided over 20,000 jobs. For Cambridge, employment in the tourism sector was estimated to be 22% of total employment.

The National Planning Policy Framework (NPPF) explains that in order to provide the social, recreational and cultural facilities and services a community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

In recent years, the use of online platforms to rent out either whole or parts of a residential unit as temporary accommodation for a variety of occupiers has increased in Greater Cambridge. Although these services provide opportunity to support growth, the widespread and concentrated prevalence of this activity can have negative effects on housing supply and on the amenity of surrounding local residents.

12.2 Policy Context

National Context

Paragraph 82 of the National Planning Policy Framework (2021) states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.

In order to support a prosperous rural economy, paragraph 84 states that planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside.

Paragraph 86 states: "Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation."; while Annex 2's definition of main town centre uses includes arts, culture and tourism development (including ... hotels).

Paragraph 93 also explains how planning policies and decisions should provide social, recreational, and cultural facilities including services needed by the community. It includes the need for:

(a) local authorities to plan positively for the provision of community facilities including public houses and other local services to enhance the sustainability of communities and residential environments;

(b) take account of, and supporting the delivery of local strategies to improve the health, social and cultural well-being of all sections of the community.

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

The Government issued its Tourism Recovery Plan in June 2021 which sets out the role that the UK government will play in assisting and accelerating the tourism sector's recovery from COVID-19. Its objectives are as follows:

- A swift recovery back to 2019 levels of tourism volume and visitor expenditure.
- As tourism recovers and then exceeds 2019 levels, the government wants to see the benefits shared across every nation and region.
- To build back better with a more productive, innovative and resilient tourism industry.
- A tourism industry that contributes to the enhancement and conservation of the UK's cultural, natural and historic heritage and minimises damage to the environment.
- A tourism industry that contributes to the enhancement and conservation of the UK's cultural, natural and historic heritage and minimises damage to the environment.
- For the UK to be a leading European nation for hosting business events.

Regional / Local Context

The Cambridgeshire and Peterborough Local Industrial Strategy (July 2019) recognises the Visitor Economy and Business Tourism as one of the five supporting sectors, which are strengths of the Cambridgeshire and Peterborough economy.

Retail, Hospitality and Leisure is identified as one of the sectors hardest hit by the Covid pandemic in Cambridgeshire and Peterborough's Local Economic Recovery Strategy. Its recovery priority for the sector is "Helping firms to deal with the continuing and long-term social distancing and behaviour change, especially in the Visitor Economy."

South Cambridgeshire Business Plan 2019-2024 includes four priority areas including 'Growing local businesses and economies', under which the plan intends to focus on, among others, promoting the area for visitors and investment. This will be measured by increasing tourism and take up of visitor accommodation as well as increased length of stays in the district.

The Corporate Plan 2019-22 for Cambridge City Council includes the objective of continued development with innovative partnerships to improve the quality of life in the city. This will include working with Business Improvement District (BID) and Fitzwilliam Museum (Enterprises) Ltd, to establish a destination management organisation for Cambridge city in order to support the recovery and development of a sustainable visitor economy. This will see visitors returning to Cambridge city centre to enjoy and support the retail, cultural and hospitality offer; and having and making a positive net contribution to the local community and economy.

The Cambridge Hotel Futures Study by Hotel Solutions was endorsed by Cambridge City Council, in August 2012 for use as an evidence base for the review of the Cambridge Local Plan and as a material consideration in planning decisions. The study considered the performance and existing and future demand and supply for new hotels in the City and immediate surrounding area. The study was used to develop policies for the Cambridge Local Plan (adopted 2018) and guide development management decisions.

The destination management organisation serving Cambridge and wider Cambridgeshire, Visit Cambridge and Beyond (VCB), closed in July 2020. The impact of the Coronavirus pandemic and subsequent travel restrictions has led to significantly reduced tourist numbers to Cambridge. With the lack of business for their organised tours has meant the organisation was no longer a going concern.

Visit Cambridge is now the official Destination Management Organisation for Cambridge and is owned and managed by a consortium of Cambridge BID, Cambridge City Council, Fitzwilliam Museum Enterprises and King's College. South Cambridgeshire District Council is currently in the process of developing a visitor website for the district.

Adopted Local Plans

The Cambridge Local Plan 2018 includes: Policy 77: Development and expansion of visitor accommodation, Policy 78: Redevelopment or loss of visitor accommodation and Policy 79: Visitor attractions.

Policy 77: Development and expansion of visitor accommodation supports high quality visitor accommodation in a number of specified mixed-use sites in Cambridge city centre and in other locations including North West Cambridge and Cambridge Biomedical Campus. The policy also outlines where new visitor accommodation should be located: on the frontages of main roads or in areas of mixed-use or within walking distance of bus route corridors with good public transport accessibility.

Policy 78: Redevelopment or loss of visitor accommodation protects visitor accommodation unless the use is no longer viable. Evidence of viability includes demonstration that all reasonable efforts have been made to preserve the facility and marketing for at least 12 months.

Policy 79: Visitor attractions explains the policy criteria that new and extended, small-in-scale visitor attractions need to satisfy to be supported by the policy. These include complementing the cultural heritage of the city and broadening the attraction on offer, especially for families. The location of new proposals should have good public transport accessibility.

The South Cambridgeshire Local Plan (2018) includes Policy E/19: Tourist Facilities and Visitor Attractions and Policy E/20: Tourist Accommodation.

Policy E/19: Tourist Facilities and Visitor Attractions explains the circumstances which need to be satisfied for new or extended tourist facilities and visitor attractions in the countryside. These include: justification for a rural location; proposals do not impact negatively on other tourist attractions and the character and appearance of the area; they are of an appropriate scale, they maximise sustainable travel opportunities and there is not a significant adverse impact on traffic generation; and they do not include living accommodation.

Policy E/20: Tourist Accommodation explains the circumstances when tourist accommodation will be supported inside and outside development frameworks. Inside, the scale and type of the proposal should relate to the role and function of the centre. Outside, suitable buildings should be repurposed and by small scale new development appropriate to local circumstance.

12.3 Consultation and Engagement

In our First Conversation consultation we received a range of views, some of them conflicting.

There were those that suggested the adoption of policies to constrain the numbers of tourists visiting Greater Cambridge. Others wanted us to restrict tourist coaches to park and ride sites (and expand these sites where appropriate) so that coaches do not come into the centre of Cambridge. Concern over trade-off between hotels and residential accommodation was highlighted and restrictions in the use of houses in short term letting sites such as Airbnb were requested.

There was some concern over the impact of increase car journeys of a growth in tourism in rural areas. There was support for improving sustainable transport options to visitor attractions; for new attractions where they are accessible to or incorporate sustainable methods of transport; and for assessing the sustainability of tourism.

We were encouraged to support an increase in visitor facilities and attractions, for example, hotels, conference facilities, skateboarding, and to support and protect existing facilities. The social value and well-being benefits of visitor attractions was highlighted. Waterways were seen as a key tourism asset. The need to increase overnight stays was highlighted and there was support for more budget accommodation on the edge of Cambridge. Cambridge East was identified as a potential location for new tourism opportunities.

The creation of a tourism plan/strategy to support the Local Plan was suggested as was an assessment of the need for any further hotels in the future and a Water Space Strategy.

12.4 Evidence Base

The visitor economy

It is estimated that the total value of tourism to the Greater Cambridge Economy in 2018 was over £1 billion and that in the same year it created over 20,000 jobs. For Cambridge, employment in the tourism sector was estimated to be 22% of total employment.

Further information on the visitor economy of Greater Cambridge is provided at Appendix 3. Key points to highlight include:

- The importance of the tourism economy to Greater Cambridge and, in particular, to Cambridge. The jobs created by the sector not only directly result from tourism businesses but also indirectly from their supply chain and the multiplier effects of spending by their employees.
- Most visitors come to Cambridge on day trips. Only 11% of visitors stay overnight in the City.
- The difference in the value that day trips bring to Cambridge compared to overnight stays is significant. Spend per trip by day visitors is on average just under £37, for overnight visitors it just over £366 per trip and just over £87 per night. The highest proportion of this spend is on shopping and food and drink.
- Overseas visitors to Cambridge tend to spend more that UK visitors. For Cambridge the figures are £563 (overseas) verses £176 (UK).
- There is a contrast between where people are staying when they visit Cambridge and South Cambridgeshire. A majority of visitors (63%) to Cambridge tend to stay in serviced accommodation such as hotels, guesthouses, inns, B&B and serviced farmhouse accommodation whereas visitors to South Cambridgeshire tend to stay with friends and family (54%)

and only approximately a third of visitors (29%) stay in serviced accommodation.

Recent trends in visitor accommodation

Appendix 3 also provides analysis of the supply of visitor accommodation in Greater Cambridge. Over the period 2012-2020 there was an increase of over 400 hotel bedrooms in the area. The majority of the growth was around the edge of Cambridge city centre. Growth in the city centre was focused on extensions to existing hotels.

Looking forward, the pipeline of future hotel bedrooms, based on the planning applications and Local Plan allocations included in Appendix 3, suggests that the next ten years could see significantly faster growth than the previous ten years. However, it should be noted that not all planning permissions or allocations will necessarily result in development activity. In total, these developments could increase the number of rooms by over 1,800.

Most of the growth will be accounted for by three sectors: 4*, aparthotels and budget hotels. The growth is concentrated in city centre and edge of city centre locations although some growth is expected in the remainder of South Cambridgeshire, for example, the Holiday Inn Express Cambridge West in Cambourne is already under construction and due to open in 2022. The pipeline only includes one hotel extension. This is likely to be an under-estimate, but it is harder to identify these in the longer term as they have a shorter gestation period.

There are also a significant number of other visitor accommodation schemes where there is less certainty concerning when or whether they will be developed. These are also outlined in Appendix 3.

The pipeline assessment does not include serviced apartments. A review of the internet suggests there has been considerable growth in this sector and would benefit from further investigation. A recent market report suggests there are five operators with 192 apartments in 2019/20.[1] This represents an increase of about 50% on the 2012 baseline.

At the smaller end of the visitor accommodation sector, about 30 planning permissions were identified which have resulted in changes to the visitor accommodation stock. Those increasing stock outweighed those reducing stock by about 3:2. However, it should be noted that information on the number of rooms was not always available, so it has not been possible to quantify the scale of change.

The most common source of new stock has been the conversion of residential properties to B&B accommodation - ten examples were identified. There have also been small scale extensions to hotels and accommodation blocks added to pubs.

---

[1] 'Statements of Needs Assessments for an Aparthotel project at CB1, Cambridge – Update December 2020', Bridgit Baker Consulting Ltd for Brookgate Property Ltd

The most common source of losses has been the conversion of B&B accommodation to Homes in Multiple Occupation (HMOs).

Hotel Clustering

In recent years, there have been several new hotels built in Cambridge and surrounding areas as outlined earlier in this section. Some of these have been located in mixed-use growth areas outside the city centre where new office developments have encouraged demand for visitor accommodation. Examples include The Clayton Hotel and Ibis at Cambridge's main railway station.

However, there are examples of hotel clustering on the edge of a predominantly residential area. One particular example is located on the Coldham's Lane junction with Newmarket Road, where two hotels have recently been built, a 219-room Travelodge and a 121-room Premier Inn along with another planned 100-room Easyhotel. The proposals have brought significant investment to the area and with the increased footfall, greater economic support to the area's local shops and services. A reasonable choice of hotel options can provide much needed competition which ensures hotel accommodation remains good value for visitors. However, with the grouping of many large hotels in one location, there is a risk that any additional hotel, or equivalent provision will have a detrimental impact on the area's character and undermine its long-term social cohesion. This is similar to the experience of other areas in Cambridge with a large concentration of residential units in use as visitor accommodation. As part of the evidence review to inform the Draft Local Plan's visitor accommodation policies, the benefits and drawbacks visitor accommodation clustering may have on residential areas will be considered.

Short terms lettings

Appendix 4 provides an analysis of the short-term lettings sector in Greater Cambridge. The sector has seen substantial growth over a number of years with the growth of the sharing economy and online lettings platforms such as Airbnb and Vrbo. A Guardian article in February 2020 estimated that there were 1,181 active Airbnb listings in Cambridge and 436 active listings in South Cambridgeshire in the six months to January 2020 with the highest incidence in Newnham, Market and Petersfield.

Short term lets can create significant problems for local residents including neighbour disturbance, safety worries and loss of social cohesion, and, where they develop in large numbers, for the local housing market. As at August 2021, the Planning Enforcement team were balancing a caseload of 60 short-term lettings cases in Cambridge.

Key issues for the Local Planning Authority when assessing cases where short term letting do not have planning permission are:

- whether there has been a material change of use i.e. a house is primarily used short-term letting accommodation first and as a home second; and
- if there has been a material change of use, whether planning permission would be granted.

Where successful enforcement action has been undertaken in Cambridge to date, there are a number of key learning points:

- The decision on whether there was a material change of use was made by the Inspector on a fact and degree basis, for example, the significant number of separate stays and the short duration of the stays.
- Determination of whether planning permission should be given for the unauthorised use was based on two main issues:
    i. Whether there would be adverse consequences for the city's stock of housing (contrary to Policy 3 in the Cambridge Local Plan 2018) including whether there were exceptional circumstances.
    ii. Whether the living conditions of the occupiers of the nearby dwellings would be adversely affected (contrary to Policy 35 of the Cambridge Local Plan 2018) including the impact on social cohesion.

There is not one single Local Plan policy in the Cambridge Local Plan 2018 that deals with short term lettings which makes enforcement more difficult and more protracted.

Forecasts for the Travel and Tourism sector

There remains a high degree of uncertainty around the medium to longer term impacts of Covid on the travel and tourism sector both locally and nationally. As part of the development of its Tourism Recovery Plan, the Government commissioned UK Tourism Scenario Forecasts research from Tourism Economics understanding of the future landscape of recovery in the Tourism and Travel sector. The analysis was conducted in late March 2021

The analysis concludes that domestic demand is likely remain the key driver of overall UK demand in the near-term. Under their baseline scenario, they forecast that domestic travel will remain 46% below 2019 levels in 2021 but recover fully by 2023. International visits in 2021 are expected to remain 73% lower than 2019 levels with travel demand returning to 2019 levels in 2025 due to uncertainty around new virus strains and longer-term economic effects.

12.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

The Greater Cambridge Local Plan will respond to the need for new visitor accommodation such as hotels and aparthotels. This will be informed by new assessments of visitor accommodation needs that will be completed to inform the draft plan stage.

Proposals for new hotels and other types of dedicated visitor accommodation within Cambridge (including its urban area extending into South Cambridgeshire) would need to be focused on accessible city centre locations, other mixed-use and large employment areas, on public transport corridors and where they assist with place-making.

Where planning permission is needed, the conversion of residential properties to permanent visitor accommodation use within Cambridge (including its urban area extending into South Cambridgeshire will be allowed only in exceptional circumstances where it does not adversely affect:

- the supply or affordability of local housing including rental values;
- residents' amenity and sense of security; and
- the local area's character or community cohesion.

Existing visitor accommodation in Cambridge will be protected from conversion subject to evidence on the viability of the current use.

Proposals for visitor accommodation within settlement boundaries in South Cambridgeshire will be supported where the scale and type of development is directly related to the role and function of the centre and supports its vitality. Outside settlement boundaries new visitor accommodation through the change of use / conversion / replacement of suitable buildings and by small scale new developments appropriate to local circumstances will be supported.

New visitor attractions in Cambridge City Centre and South Cambridgeshire's countryside subject to criteria such as sustainable travel.

In Cambridge, due to the level of visitors that come into the city each day, the visitor attraction policy is intended to focus on helping the following areas:

- Extending the length of visits
- Supporting visitor management
- Reducing the pressures on existing attractions within the city centre.

As such, new attractions would need to be limited in scale, to complement the existing cultural heritage of the city and assist the diversification of the attractions on offer, especially to better support the needs of families.

Proposals for new or extended tourist facilities and visitor attractions (excluding accommodation) in the countryside of South Cambridgeshire should utilise and enhance the areas existing tourism assets and show an identified need for a rural location.

Reasons for the Proposed Policy Direction

Tourism is important sector for the Greater Cambridge economy. It is estimated that the total value of tourism to the area in 2018 was over £1 billion and that in the same year it provided over 20,000 jobs. For Cambridge, employment in the tourism sector was estimated to be 22% of total employment.

Applying the positive approach required by the NPPF and the responding to the key role that the visitor economy plays in the Greater Cambridge economy, the Proposed Policy Direction responds to the need for new visitor accommodation such as hotels and aparthotels. This may include supporting dedicated serviced apartments, based upon a proven local corporate need.

Prior to the start of the COVID-19 pandemic, plans were in place to commission a review of the demand and supply of visitor accommodation in Greater Cambridge to include recommendations on future provision which could be incorporated in the First Proposals consultation. With the disruption and uncertainty caused to the hospitality industry by COVID-19, this evidence will now be prepared to inform the Draft Plan. It is expected that the position in respect of the tourism market for Greater Cambridge will be clearer at this stage. Where potential opportunities for new visitor accommodation are recommended in the study, these will be allocated at Draft Plan stage.

Dedicated service apartment uses may help alleviate demand for unauthorised visitor accommodation in residential properties and assist with the re-location of new employees to the area, often recruited by large multi-national operating in Cambridge and surrounding area. It is, however, important that such proposals response to a proven need and, as such, will be reviewed through the assessment of need for visitor accommodation.

During the plan period, applications for visitor accommodation may also be submitted on sites not already identified. The policy direction above captures how the assessment of these sites would vary according to their proposed location within Greater Cambridge. Reflecting the contribution that the visitor economy makes to the Greater Cambridge economy and the potential value to the area of growing overnight stays, new accommodation would be supported subject to local circumstances.

Ensuring that there is sufficient visitor accommodation to meet demand is not only about the provision of new accommodation. It is also about maintaining the existing stock of accommodation. It is therefore proposed to retain a policy that protects existing visitor accommodation from conversion subject to evidence on the viability of the current use.

There remains a potential issue with new visitor accommodation in the countryside being built to circumnavigate restrictions on residential development in the countryside. It is therefore proposed to maintain the existing policy whereby development of holiday accommodation is limited to short term holiday lets through conditions or legal agreement and permitted development rights may be removed in the interests of amenity.

In recent years, the use of online platforms for short term lets such as Airbnb to rent out either whole or parts of a residential unit as temporary accommodation for a variety of occupiers has increased in popular tourist locations and areas close to large employment centres. This is particularly the case in Cambridge, including areas close to the main railway station and Trumpington Meadows where these activities are clustered together. Although these services provide opportunity to support good growth in cities, the widespread and concentrated prevalence of this activity can have negative effects on housing supply and on the amenity of surrounding local residents. These include:

- Loss of amenity space, privacy and enjoyment of their home resulting from patterns of behaviour of short-term tenants.
- Continual disruption caused by visitors moving in and out of the premises, disruptive occupants and associated servicing of the unit(s).
- Frequent rotation of unknown, neighbouring occupiers undermines residents' sense of security of living in their own homes.

Whilst the use of residential premises for short term lettings does not always require planning permission, where there is a material change of use from residential to visitor accommodation, permission would only be given in the exceptional circumstances described in the policy direction.

Cambridge has experienced, in recent years significant pressure on the local housing market with whole residential units being used as visitor accommodation to host people moving to the city, often for employment reasons. This is particularly the case in areas close to the main railway station and Trumpington Meadows where these activities are clustered together. Dedicated service apartment uses may help alleviate demand for unauthorised visitor accommodation in residential properties and assist with the re-location of new employees to the area, often recruited by large multi-national operating in Cambridge and surrounding area. It is, however, important that such proposals response to a proven need and as such will be reviewed through the assessment of need for visitor accommodation.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy – Not considered a reasonable alternative as the sustainability and amenity impacts of visitor accommodation, and the significant role of tourism in Greater Cambridge, mean policy guidance is required.

12.6 Further Work and Next Steps

With the disruption and uncertainty caused to the hospitality industry by Covid-19, this evidence will now be prepared to inform the Draft Plan. It is expected that the position in respect of the tourism market for Greater Cambridge will be clearer at this stage, and the draft plan will respond to this evidence.

13. J/FD Faculty Development and Specialist/Language Schools

13.1 Issue the Plan is Seeking to Respond to

The University of Cambridge continues to be a world leader in higher education and research. It is also a vital driver of the Cambridge economy and is the reason why so many high technology and knowledge-based employers decide to locate in the city. It contributes to and is dependent upon the quality of life in the city and city centre.

The University of Cambridge and its colleges are also significant employers, providing over 12,000 jobs. Their reputation and heritage continue to attract students from across the world, tourists, language students, spin-off enterprise and medical research, and it continues to be a vital driver of the local and national economy.

Anglia Ruskin University has made significant investment in its East Road sites which remain the most sustainable location for future investment.

There are a growing number of specialist colleges in Cambridge which is also an important centre for the study of English as a foreign language. Courses are run throughout the year for a broader range of students, including people working in business as well as the more traditional younger students. These institutions can have significant economic benefit however it is important that the impacts of their growth are properly managed. Specialist colleges and language schools can place additional burdens on the housing market.

It is therefore important to support the growth of higher education institutions, language schools and specialist colleges while minimising their potential impact of new development.

13.2 Policy Context

National Context

Paragraph 20 of the [National Planning Policy Framework]() (2019) requires local authorities to make sufficient provision for, amongst other uses, community facilities such as education infrastructure. Paragraph 80 also explains that planning policies should help create an environment where businesses can invest, expand and adapt. This includes emphasising a clear need to support economic growth and productivity that takes account of both local business needs and wider opportunities for development. Paragraph 94 also requires local authorities to take a proactive, positive and collaborative approach to development that broadens the choice in education available to local communities.

Regional / Local Context

The Assessment of Student Housing Demand and Supply for Cambridge, referred to hereafter as the Study was commissioned by Cambridge City Council to support the Cambridge Local Plan 2018 and Development Management processes. The Study indicated 46,132 students in Cambridge needed some form of accommodation. Of these, 22,410 are housed in purpose-built student accommodation (PBSA), an estimated 9,157 are in shared housing, 12,129 are in existing family housing (either in the parental home or 'homestays'), and there is no information for 2,436 students.

In terms of current student accommodation provision in shared existing housing by institution, the University of Cambridge houses 729 undergraduates and 3,003 postgraduates (total: 3732) in shared existing housing. In total these students occupy between 600 and 875 shared houses.

Anglia Ruskin University houses 4,285 undergraduates and 785 postgraduates (total: 5070) in shared existing housing. In total these students occupy between 1,000 and 1,450 shared houses, depending upon the average number of students to each shared house. The non-university institutions also make relatively little use of shared housing, with only 355 students accommodated in shared housing, or only 2% of the total number of non-university institution students.

The Study estimated the current need, in 2016 for PBSA (for both Universities) of 6,085 bed spaces (University of Cambridge: 3282; Anglia Ruskin: 2803). This figure is reduced from the maximum position of 8,802 (University of Cambridge: 3732; Anglia Ruskin: 5070) to 6,085 bed spaces because mature students are less likely to live in shared housing.

The 6,085 bed spaces figure is the amount of PBSA that would be needed to accommodate all of the current students who are not housed by their educational institution or living in existing family housing. If these were provided in PBSA, they could allow the return of all shared houses currently occupied by students to the open market.

In terms of student growth requiring accommodation to 2026, the University of Cambridge's current planning framework envisages an expansion in undergraduate numbers of 0.5% per year for the next ten years, and in postgraduate numbers of 2% per year. If the University's planned growth was achieved and if the categories of non purpose-built accommodation all grew in proportion to their current numbers, the balance of accommodation is then assumed to be provided either in shared housing or in additional PBSA (2,874 bedspaces).

Anglia Ruskin University is planning to maintain the same student numbers in Cambridge over the next five to ten years. For non-university institutions, if future plans for growth are achieved, this could mean at least a further 230 students taking courses in other educational institutions by 2026 who will require accommodation.

Adopted Local Plans

The Cambridge Local Plan (2018) includes Policy 43: University development. This supports the development or redevelopment of faculty, research and administrative sites for the University of Cambridge and Anglia Ruskin University (including teaching hospital facilities) which satisfies the policy criteria. These include the need to make effective use of land, to provide a mix of uses on larger sites, to take reasonable opportunities to improve circulation for pedestrians and cyclists, together with public realm improvements, reductions in car parking provision and the introduction of active frontages at ground floor level. The policy also indicates the locations where university faculty development will be supported.

Policy 44: Specialist colleges and language schools requires the development of new and existing specialist colleges and/or language schools to provide residential accommodation, social and amenity facilities for all non-local students (students arriving to study from outside Cambridge and the Cambridge sub-region), with controls in place to ensure that the provision of accommodation is in step with the expansion of student places. The use of family dwelling houses to accommodate students at specialist colleges and/or language schools is not appropriate.

The South Cambridgeshire Local Plan (2018) does not include any specific policies regarding university, specialist college or language school development.

13.3 Consultation and Engagement

Responses to the First Conversation included the following:

- Anglia Ruskin University highlighted the need to support modernised and enhanced provision on Anglia Ruskin University's East Road site and surrounding area.

In April/May 2021, additional stakeholder engagement with Anglia Ruskin University and the University of Cambridge was undertaken to better understand their future growth ambitions including the impact of Covid-19.

Anglia Ruskin University is developing a new masterplan for their Cambridge campus on East Road. This will focus on consolidation and refurbishment of campus buildings with further adaption to provide blended learning/teaching with a mix of on campus and off-site learning and teaching using digital technologies.

The University of Cambridge will concentrate its operational and non-operational development through the lifetime of the next Local Plan at existing operational sites including Eddington, West Cambridge, Cambridge Biomedical Campus, New Museums Site, Downing Site, and the Department of Engineering Site, in order to:

- Meet new needs for academic research, teaching and supporting professional services; and

- replace building assets that are at or nearing end-of-life or which have inadequate functional suitability (we have recently completed estate wide building condition and functional suitability surveys that will inform the forthcoming Strategic Estates Masterplan and an associated Capital Investment Plan). This is relevant to the Downing and New Museums Sites, in particular. Existing Local Plan policies for development of sites such as these should roll forward.

13.4 Evidence Base

On-going stakeholder engagement with Anglia Ruskin University and the University of Cambridge to better understand how their growth ambitions can be included in the Draft Local Plan.

13.5 Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed policy direction, as set out in the First Proposals report is as follows:

We propose to support new faculty and specialist facilities/development in Greater Cambridge which meet the following requirements:

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

We propose that the development of existing and new specialist colleges and/or language schools will be permitted where they provide residential accommodation, social and amenity facilities for all non-local students (students arriving to study from outside Cambridge and the Cambridge sub-region), with controls in place to ensure that the provision of accommodation is in step with the expansion of student places. The use of family dwelling houses to accommodate students of specialist colleges and/or language schools only is not appropriate.

Reasons for the Proposed Policy Direction

The University of Cambridge continues to be a world leader in higher education and research. It is also a vital driver of the Cambridge economy and is the reason why so many high technology and knowledge-based employers decide to locate in the city. It contributes to and is dependent upon the quality of life in the city and city centre.

The University of Cambridge and its colleges are also significant employers, providing over 12,000 jobs. Their reputation and heritage continue to attract students from across the world, tourists, language students, spin-off enterprise and medical research, and it continues to be a vital driver of the local and national economy.

Anglia Ruskin University has made significant investment in its East Road sites which remain the most sustainable location for future investment.

There are a growing number of specialist colleges in Cambridge which is also an important centre for the study of English as a foreign language. Courses are run throughout the year for a broader range of students, including people working in business as well as the more traditional younger students. These institutions can have significant economic benefit however it is important that the impacts of their growth are properly managed. Specialist colleges and language schools can place additional burdens on the housing market.

It is therefore important to support the growth of higher education institutions, language schools and specialist colleges while minimising their potential impact of new development.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy – Not considered a reasonable alternative as this could result in unsustainable development such as locating new faculty development in relatively less accessible locations or not providing satisfactory mitigation measures to reduce the impact of the new development.

13.6 Further Work and Next Steps

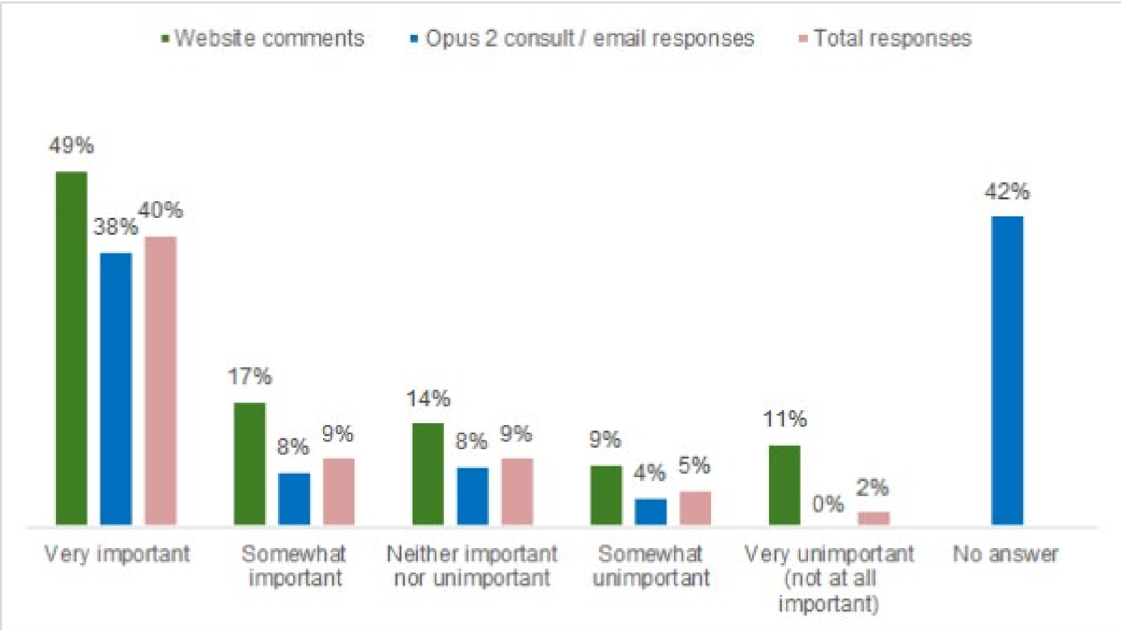
Anglia Ruskin University is developing a new masterplan for their Cambridge campus on East Road. Working with Anglia Ruskin, the Councils will review and assess the masterplan and consider the implications for the Draft Local Plan.

The University of Cambridge is reviewing their Strategic Estates Masterplan. Working with the University, the Councils will review and assess the masterplan with the aim of reviewing any specific site allocations in the Draft Local Plan, to support the implementation of the masterplan, subject to the necessary planning consents.

Appendix 1: First Conversation Feedback

This section of the topic paper provides a summary of the feedback from the First Conversation related to this theme, and how comments have been taken into account. A report on the consultation, and full details of the comments received can be found on the Greater Cambridge Planning website.

Question 24: How important do you think continuing economic growth is for the next Local Plan?



35 Website comments and 144 Opus 2 Consult/email responses were received to this question.

Most respondents felt that continuing economic growth was important, with 49% either agreeing or strongly agreeing overall.

71%of website commenters (35 in total) an 98% of Opus 2 Consult/email respondents (141) left a written comment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Very important to continue economic growth	It will be very important for the emerging GCLP to support economic growth in Greater Cambridge.	The needs of the Greater Cambridge Economy have been carefully considered when developing the preferred options. The Councils commissioned a Greater Cambridge Employment Land Review (2020) which explored potential jobs growth, and the need for different types of employment land in terms of quantity, type and location. This includes consideration of the needs of the high tech clusters that form part of the Cambridge economy. The proposed options responds to the most likely jobs growth outcome identified in the study. It also identifies potential land allocations which would add to the committed land supply to meet those needs.
Very important to continue economic growth	It is vital that the GCLP supports the economic growth of the area to fully realise the benefits of the investment in infrastructure and to ensure residents are able to live fulfilling lives	See response above

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Very important to continue economic growth	CPIER highlights need to support economic growth, and states that the UK Government should adopt a ‘Cambridge or overseas’ mentality towards knowledge-intensive business in this area	See response above
Very important to continue economic growth	Continued economic growth is extremely important in the next Local Plan period, not least because it is inextricably linked to quality of life social, physical and mental wellbeing.	See response above
Very important to continue economic growth	Continued economic growth is the only way for an area to achieve long term improvements in socioeconomic living standards for the benefit of all residents.	See response above
Seek to increase the level of economic growth in the area	The Cambridge and Peterborough Devolution Deal commits the authorities in the area to planning to double economic output by 2040. This approach is supported.	Noted. The Councils commissioned a Greater Cambridge Employment Land Review (2020) to provide an evidence based approach to the likely economic growth in the period to 2041.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Need for economic related evidence base updates	It is recommended that an up-to-date Retail and Leisure Study is commissioned, to ensure the approach to retail in the Plan meets the needs of the area.	A new retail and leisure study has been commissioned to inform the Local Plan. Further information can be found in the Jobs Topic Paper which accompanies the preferred option. The Councils have also commissioned a Greater Cambridge Employment Land Review (2020), which has informed the preferred options stage.
Need for economic related evidence base updates	The new Local Plan should set out clearly what is the current situation and how these factors are assumed to be linked in the future	See response above
Need for economic related evidence base updates	The new Local Plan evidence base should assess the impacts of a range of growth scenarios, to support the identification of an appropriate strategy in the Plan	The Greater Cambridge Employment Land Review (2020), as part of the wider review of Development Strategy Options , has considered a range of growth scenarios.
Employment	The new Local Plan should seek to provide a range of employment at all levels	The preferred options identified seek to deliver a range of employment land types and locations, and include policy proposals which would seek to widen the job opportunities provided by new developments.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Employment	Vital that the new Local Plan maximises jobs growth	In accordance with national planning policy and guidance, the new Local Plan should seek to allocate sufficient employment land to meet the needs of the area. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.
Economic strategy	The new Local Plan should seek to create an innovation cluster, which can play a major part in delivering economic adaptations which support climate change mitigation.	Noted. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.
Economic strategy	Investment in knowledge clusters and technologies that support and reduce the impact on climate change should be given priority.	See response above
Economic strategy	Support for the creation of a range of employment opportunities in rural areas.	Noted. The preferred options report includes proposals for policies which would support employment development in the rural area of various types appropriate to the location whilst balancing sustainability issues.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Economic strategy	The Local Plan should provide sufficient land and policy support for locally as well as regionally or internationally generated employment development to be located where residents and services can reach them sustainably and the culture of success can be nurtured.	Noted. Policies and allocations are proposed in the Preferred Options Report which support a range of types and scales of employment. Access to transport has been a key consideration in identifying the proposed locations, and policies proposed.
Economic strategy	Economic, housing and infrastructure growth must be given comparable weight to the other Big Themes at the very heart of the Local Plan	Noted. The Local Plan seeks to continue to support the important Cambridge economy, whilst also considering housing and other infrastructure needs, as well as the impact on the environment. A range of evidence has informed the preferred options report, and the preferred options report provides the opportunity to respond to the approach proposed for the new local plan.
Economic strategy	Economic growth is essential in order to meet the big themes identified in the consultation document	Noted.

Overarching theme / topic	**Summary of issues raised in comments**	**How the comments have been taken into account**
Economic strategy	The new Local Plan needs to stop the underlying trend of skilled manufacturing and development space being lost and not replaced in the right locations	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.
Economic strategy	Support economic growth and productivity taking into account both local business needs and wider opportunities for development.	Noted. Policies proposed seek to respond to a range of needs for employment space.
Economic strategy	Economic growth is desirable but it cannot be at the expense of the environment, social cohesion and the wellbeing of residents. We need growth that is genuinely sustainable rather than an unbalanced rapid dash	Noted. The Local Plan seeks to continue to support the important Cambridge economy, whilst also considering housing and other infrastructure needs, as well as the impact on the environment. A range of evidence has informed the preferred options report, and the preferred options report provides the opportunity to respond to the approach proposed for the new local plan.
Economic strategy	Support fast paced economic growth, to maximise Cambridge's current strong economic position	See response above

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Economic strategy	Economic growth should be linked to environmental impacts, therefore only allowing growth with environmental impacts which support the aims and objectives of the Plan.	See response above
Economic strategy	Only support sustainable economic growth	See response above
Economic strategy	Objection to economic growth due to impacts on infrastructure, house prices, and the ability of the City Centre to cope with the increased population	See response above

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Economic strategy	Objection to supporting further economic growth in principle, due to it being unsustainable, and negative impacts on the environment.	Noted. The Local Plan seeks to continue to support the important Cambridge economy, whilst also considering housing and other infrastructure needs, as well as the impact on the environment. A range of evidence has informed the preferred options report, and the preferred options report provides the opportunity to respond to the approach proposed for the new local plan.
Economic strategy	Objection to economic growth due to impacts on the environment and water provision	Noted. The preferred options report has been informed by an Integrated Water Strategy that considers the availability of water to support growth that could be identified in the new local plan.
Economic strategy	Objection to further economic growth until more sustainable transport and green infrastructure is provided in the area	Noted. Green Infrastructure is a key theme of the preferred options consultation. Evidence accompanying the plan has explored how green infrastructure could be enhanced through the local plan and by working with partners. The development strategy proposed responds to planned transport infrastructure enhancements in the area. Views are sought through the consultation.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Economic strategy	Objection to economic growth which results in the loss of Green Belt land	Noted. Preferred options report proposes the preferred approach to the development strategy for 2041, which has been developed by considering and comparing the alternative strategies available. A number of developments in the Green Belt are proposed, where it is considered they are justified by site specific circumstances. The preferred options report provide the opportunity to comment on these prior to the preparation of the draft local plan.
Economic strategy	Only support economic growth on brownfield land	Noted. Use of previously developed land is an important factor, but the plan has to balance a range of issues. Through the Housing and Employment Land Availability Assessment opportunities for brownfield development have been considered. The development strategy proposed in the preferred options has considered brownfield land opportunities alongside a range of other factors. The allocations proposed in the preferred options report include some major brownfield sites, but also some greenfield sites.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Economic strategy	The target of doubling the level of economic output over 25 years is far too high. Object to seeking this level of growth	Noted. The Councils commissioned a Greater Cambridge Employment Land Review (2020), which considers the likely growth of the economy over the period to 2041, and the land requirements that would entail.
Economic strategy	Only support controlled economic growth, linked to housing growth and the provision of affordable housing	Noted. The needs of the Greater Cambridge economy have been carefully considered when developing the preferred options. The Councils commissioned a Greater Cambridge Employment Land Review (2020) which explored potential jobs growth, and an accompanying study has considered how this would relate to the need for homes. This has been reflected in the approach to jobs and homes identified for consultation in the preferred options report. More information can also be found in the Strategy topic paper.
Location of economic growth	Sustainable economic growth is supported which should not compromise the City's identity, and should seek to protect the environment	Noted. Policies and allocations proposed in the Preferred Options Report Economic seek to support and enhance sustainable economic growth in the area, taking into account the impacts of growth on the character and appearance of the area, and the impacts on the environment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Location of economic growth	Support growth outside of Cambridge City	Noted. The preferred options report identifies a number of development locations outside Cambridge. The Local Plan needs to identify and respond to the development needs of Greater Cambridge unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework. The preferred options sets out how development needs could be met, and they are being subject to consultation before the local plan is drafted.
Transport	Support for economic growth in market towns as well as Cambridge City	Noted. The market towns are located outside Greater Cambridge. The Local Plan needs to identify and respond to the development needs of Greater Cambridge unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework. The preferred options sets out how development needs could be met, and they are being subject to consultation before the local plan is drafted.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Transport	Transport is key to the spatial strategy. No support for reduced car parking and access in Cambridge City Centre.	Noted. The Infrastructure section of the Preferred Options Report proposes a policy approach to car parking in new developments which would a seek to reduce parking where there are sustainable transport alternatives.
Housing growth	An effective transportation system is fundamental to sustaining economic growth. Car based commuting is unsustainable, therefore support growth along the East West Rail line.	The development strategy proposed in the Preferred Options Report considers the location of homes relative to jobs and sustainable transport infrastructure. Further information can be found in the strategy section of the plan, as well as the Strategy Topic Paper.
Housing growth	Economic growth needs to be captured in an appropriate spatial strategy which balances employment growth with housing development.	Noted. The development strategy proposed in the Preferred Options Report seeks to ensure that a sufficient level of housing growth is allocated to support economic growth anticipated.
Infrastructure	Ensure housing growth is located close to employment opportunities	The development strategy proposed in the Preferred Options Report considers the location of homes relative to jobs and sustainable transport infrastructure. Further information can be found in the strategy section of the plan, as well as the Strategy Topic Paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Design	Economic growth should be supported by appropriate services and facilities, including healthcare services	Noted. This issue is addressed in the Infrastructure theme in the preferred option report, and sets out policy proposals regarding infrastructure delivery. The Local Plan will also be accompanied by an Infrastructure Delivery Plan, which will set out what is needed, when it is needed, and how it will be funded.
Policy recommendations	Hi-tech related growth will require a higher quality environment	The Great Places theme proposes policy approaches which would seek high quality design in all new development proposals.
Policy recommendations	Objection to the allocation of A5 uses	Local Plan development management policies can seek to restrict A5 uses (hot food takeaways) in certain areas, for example near schools. The Preferred options report seeks views on this issue in the Wellbeing and Social inclusion theme.
Policy recommendations	Objection to Policy 44 of the existing Local Plan, restricting the development of supporting residential facilities to be in step with expansion in student places.	Noted. Policies seek to address the impact of language schools on housing stock. The policy approach is proposed to be taken forward into the new local plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Policy recommendations	Policies in the new Local Plan should provide flexibility for businesses in the area to expand. The new Local Plan should seek to support business to expand without overly restrictive policies.	The preferred options report proposes policies which seek to support the expansion of businesses appropriate to the location.
Policy recommendations	The new Local Plan should include a new strategy for tourism, seeking to increase longer-stay visits who have the greatest benefits to the economy, and reducing short-stay visits.	The Preferred options report proposes policy approaches to address visitor accommodation and visitor facilities. It seeks to support the benefits provided by tourism, as well as addressing some of the challenges, particularly in relation to short term lets. The Jobs Topic Paper provides further information, including the approach to preparing further evidence at the next stages of plan making when the impacts of covid19 on the industry can be better understood.
Policy recommendations	Tourism related facilities should be provided outside of the City Centre	See response above
Miscellaneous	Support homeworking by ensuring the provision of good quality broadband services	The Infrastructure theme of the preferred options report proposes a policy approach which would require the provision of high quality broadband services in new development proposals to support opportunities for homeworking.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Miscellaneous	Economic growth should be supported, and sites specific proposals are referenced as being suitable to help accommodate it.	Noted. A range of site specific proposals have been referenced in representations to this question. Sites suggested have been tested through the Housing and Employment Land Availability Assessment.
Miscellaneous	The new Local Plan should focus on creating good places to live	The Great Places theme in the preferred options report proposes policies which seek high quality design and landscaping in all new development proposals.
Miscellaneous	Set up Greater Cambridge Job Guarantee Program. Supporting people who have been out of work for long periods of time to find a job.	The new Local Plan can support economic growth and job creation through economic policies and the aims and objectives of the new Local Plan. It is however beyond the scope of the Local Plan to develop a Job Guarantee Program.

Question 25: What kind of business and industrial space do you think is most needed in the area?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Type of employment space	A wide variety of employment space in terms of location, size, function and price, to offer choice to meet the occupier's individual needs	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Type of employment space	It is essential that a range of business and industrial space is provided. This should include space for start-ups (for those business in the early stage of a new business), Incubator (providing start-up and scale-up space for companies, including support and services) and grow-on space (premises suitable for small growing businesses). The plan should be flexible to adapt to changing working practices and respond quickly to opportunities for specialist space.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Type of employment space	Plan for flexible workspace and co-working hubs, providing shared facilities, which can adapt to fast-changing working practice	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding work hubs and shared facilities.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Type of employment space	Small employment space for high tech / manufacturing companies located in key villages and new settlements	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Type of employment space	Skate shops, skate parks, art galleries, youthful cultural spaces	Noted. A study has been carried out of the needs of Creative Industries, which has informed policy proposals.
Economic growth	Strengthen opportunities for local supply chains to engage in the growth industries of the region	Noted. The wellbeing and social inclusion theme in the Preferred Options Report includes policy proposals regarding creating inclusive employment and business opportunities.
Economic growth	Greater Cambridge should provide housing delivery in excess of its standard method figure, where housing delivery rates may need to double to meet current demand.	Noted. The Strategy Chapter in the preferred options report considers local need for housing and employment growth.
Economic growth	Flexible commercial space in urban and rural areas	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as work hubs.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Economic growth	Policies should seek to strengthen Cambridge’s Science and Technology sector.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes responding to the needs of Cambridge's high technology clusters. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Allocating new employment land	Allocate new employment land to provide local employment closer to homes, diversify and enhance rural jobs, and help alleviate pressure for those who commute into the current employment hotspots	Noted. The development strategy proposed has considered the relationship between homes and jobs, as well as access to sustainable forms of transport. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Allocating new employment land	All new employment space should be located and built to maximise the health and wellbeing of employees and visitors. Healthy buildings in locations that reduce commute times and improve the sleep and wellbeing of its occupants	Noted. The development strategy proposed has considered the relationship between homes and jobs, as well as access to sustainable forms of transport. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	Sufficient land and business space should be identified in the emerging GCLP to meet the ongoing needs and growth of knowledge intensive businesses in the Greater Cambridge area.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes responding to the needs of Cambridge's high technology clusters. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Allocating new employment land	The new Local Plan should allocate a new park dedicated solely to the AgriTech sector	Noted. It is not considered that there is a need for a specific major site for agritech in Greater Cambridge. The First Proposals includes a number of site proposals in addition to the significant committed land supply for employment.
Allocating new employment land	Cambridge lacks a distribution hub where goods are consolidated into loads for last mile (5 mile) delivery, thereby reducing the volume of HGVs moving in and through the city and reducing air pollution.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals for additional space regarding local warehousing.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	The new Local Plan should allocate additional land to support the life sciences sector, which is rapidly expanding in the area.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes responding to the needs of Cambridge's key clusters. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Allocating new employment land	Ensure all new developments include space for adaptable business and light industrial uses, to support a mix of activities in new developments.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals to include business pace as part of major new mixed use development proposals. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	Any major new developments should allocate land for manufacturing enterprises	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals to include business space as part of major new mixed use development proposals. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Allocating new employment land	To ensure accommodation for a range of business types which meets future needs, the new Local Plan should allocate new business parks.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020).
Allocating new employment land	identify B8 distribution opportunities along the A14 corridor	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals for additional warehousing space.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	the A10 corridor allows the opportunity to allocate employment sites for B1, B1C and B2 uses on a primary road network	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals for additional space to provide for a range of uses.
Allocating new employment land	Allocate land for the relocation of light industrial manufacturing	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals for additional space to provide for a range of uses.
Allocating new employment land	Support the allocation of business units in medium and smaller villages in the area to create local jobs and services and reduce the need to travel.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of sites are proposed at villages, along with policies to support windfall sites coming forward.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	Support for retaining businesses within Cambridge City, rather than locating employment uses on the edge of the City and beyond.	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.
Allocating new employment land	The new Local Plan should allocate land to support growth in life sciences, digital and information technologies (including artificial intelligence), advanced manufacturing and materials, and agri-tech sectors.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020).
Allocating new employment land	Objection to the allocation of additional employment land. The new Local Plan should instead focus on the provision of affordable housing.	Noted. The proposed strategy in the preferred options seeks to respond to the needs for employment land as well as to meet affordable housing needs.
Allocating new employment land	Objection to the allocation of additional employment land where areas such as Biomedical are not yet fully developed.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Particular issues regarding the Cambridge Biomedical Campus are explored in the strategy theme and topic paper, where an allocation is proposed to respond to the long term needs of the site.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Rural economy	Support policies which allow flexible growth of local businesses within the rural economy	Noted. The preferred options report includes proposals for policies which would support employment development in the rural area of various types appropriate to the location whilst balancing sustainability issues.
Transport	Ensure all business and industrial spaces are connected to sustainable modes of transport and are accessible from surrounding residential areas.	Noted. The identification of site allocations in the preferred options report has considered the relationship with the transport network and sustainable travel opportunities.
Transport	Require new employment related development to provide cycle facilities, including changing rooms and electric bike parking.	Noted. The preferred options report proposes policy approaches to ensure appropriate cycle parking in the Infrastructure theme.
Needs for growth	Currently, there is insufficient business space to meet the needs of the AgriTech sector.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). However, it is not considered that there is a need for a specific major site for agritech in Greater Cambridge.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Needs for growth	Need for facilities in the Cambridge area for technology development / process development related to advanced therapies, including cellular and gene therapies. Need for facilities which are responsible for turning the research into usable therapies.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes responding to the needs of Cambridge's high technology clusters. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Needs for growth	There are insufficient manufacturing facilities for making clinical grade products that can be used for patients	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes opportunities for industry and warehousing as well as R&D and offices.
Needs for growth	Need for more prime office floorspace in high quality developments in the area	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Needs for growth	There is a need for:	

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Needs for growth	• Small to medium office and manufacturing/engineering/laboratory units.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Policy approaches are also proposed regarding affordable work space and local work hubs. Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Needs for growth	• Serviced and un-serviced offices.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Policy approaches are also proposed regarding affordable work space and local work hubs. Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Needs for growth	• Mix suitable employment space with housing more organically to encourage local working.	Noted. The Jobs theme in the First Proposals Report includes policy proposals regarding affordable workspace as well as local work hubs.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Needs for growth	Small, affordable start-up units for lower skilled businesses.	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as work hubs.
Needs for growth	Small incubator units for industrial, research and development or office based businesses to provide opportunity for small business to start and hopefully grow into larger premises.	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as work hubs.
Needs for growth	When it comes to high quality, affordable prototyping manufacturing and testing space, there is a major shortage in the area. This type of employment use needs to operate from larger buildings and cannot operate from the stock of offices and laboratories currently available within the local market.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments.
Needs for growth	Allocating space for large tech company headquarter buildings with good access to sustainable modes of transport.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). The identification of site allocations in the Report has considered the relationship with the transport network and sustainable travel opportunities.

Overarching theme / topic	**Summary of issues raised in comments**	**How the comments have been taken into account**
Needs for growth	A mixture of B1, B2 and B8 industrial spaces	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Needs for growth	Need for more warehouse space in the area, linked to transport connections	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). This includes proposals for additional space regarding local warehousing.
Needs for growth	The Plan should encourage the development of incubator and innovation developments in prime locations. Cambridge needs to do more to support its own “home-grown” commercial opportunities.	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as work hubs.
Needs for growth	The new Local Plan should also seek to provide for lower skilled jobs	Noted. The wellbeing and social inclusion theme in the Preferred Options Report includes policy proposals regarding creating inclusive employment and business opportunities.
Needs for growth	New retail development and hotel accommodation	Noted. The preferred options report proposes policies regarding retail and visitor accommodation.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Environment and climate change	Spaces should be sustainable, built to Passivhaus standards, with good access by sustainable modes of transport and good disabled access	Noted. The Climate Change theme of the preferred options proposes building standards that would apply to employment developments, and the infrastructure theme addresses transport access.
Retail	The new Local Plan should seek to support traditional market traders	Noted.
Policy recommendations	Allow a degree of flexibility within the key employment policies in order to allow for the changing circumstances of the market which move much faster than planning policy	Noted. The proposals in the preferred options report respond to the evidence provided by the Employment Land Review, and seek to deliver a flexible supply of employment land which can respond to changing circumstances.
Policy recommendations	The GCLP must not seek to dilute or work against the promotion of start-ups and existing businesses	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020).
Policy recommendations	The new Local Plan should be regularly reviewed to ensure forecasted growth is occurring as planned.	Noted. The Local Plan will be subject to regular review.
Policy recommendations	The new Local Plan should seek to protect existing businesses by providing / maintaining affordable space	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Policy recommendations	To support the economy, the new Local Plan should seek to support sectors in education, health and tourism	Noted. The Jobs theme in the preferred options report proposes policy approaches related to the tourism industry. Education and health are addressed in the wellbeing and social inclusion theme.
Policy recommendations	Encourage the location of businesses that can provide jobs for local young people.	Noted. The Wellbeing and social inclusion theme in the Preferred Options Report includes policy proposals regarding creating inclusive employment and business opportunities.
Policy recommendations	The new Local Plan should support homeworking	Noted. The preferred options report identifies policy approaches related to support of home working, which can be found in the Jobs theme.
Policy recommendations	Support ‘farmstarts’ / small growers	Noted. The Jobs theme in the preferred options report proposes policy approaches related to the rural economy.
Policy recommendations	Support tourism related activities	Noted. The Jobs theme in the preferred options report proposes policy approaches related to the tourism industry.
Miscellaneous	There is a need for more leisure facilities in the area, including swimming pools	Noted. Infrastructure needs related to development will be identified through the Infrastructure Delivery Plan, which will accompany the draft Local Plan.

Question 26: Do you think we should be protecting existing business and industrial space?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Assessing the need for existing employment space	A greater understanding of industrial need is required, and in particular how essential it is for certain businesses to be in Cambridge.	Noted. The proposed options report has been informed by the Employment Land Review (2020) which has explored the needs of the economy. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge. Detailed issues have also been explored through the North East Cambridge AAP process.
Assessing the need for existing employment space	There is a need in the local area for more B1c, B2, and B8 uses to fulfil operator demand.	Noted. The proposed options report has been informed by the Employment Land Review (2020) which has explored the needs of the economy.
Assessing the need for existing employment space	There is a significant shortage of both residential and commercial floorspace across Greater Cambridge.	Noted. The proposed options report has been informed by the Employment Land Review (2020) which has explored the needs of the economy.
Assessing the need for existing employment space	Assess existing employment land to determine the most appropriate locations to continue employment uses.	Noted. The Employment Land Review (2020) has reviewed existing employment sites and allocations to consider if they warrant continued allocation or protection, and the findings are reflected in the Proposed Options Report.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Assessing the need for existing employment space	Support the change of use of employment land in village locations where the uses are now inappropriate for the local area due to noise and the use of the local road network by HGVs.	Noted. The proposed policy approach regarding protection of employment land would continue to allow redevelopment where it was demonstrated existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems.
Protecting existing employment land	Protect existing employment in rural areas and sustainable locations	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.
Protecting existing employment land	Protect existing employment space which meets local needs	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.
Protecting existing employment land	The Local Plan should seek to protect sites associated with waste management, concrete, coated roadstones, and rail heads from the pressures for housing land.	Noted. The infrastructure chapter of the preferred options proposes the approach to protecting existing infrastructure. The North East Cambridge AAP has considered the particular circumstances around the site at Chesterton Sidings.
Protecting existing employment land	Ensure new Local Plan policies require appropriate marketing of employment sites before change of use can be allowed.	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.
Protecting existing employment land	Consider enforcing a charge / payment per job lost where the change of use of an employment site has occurred.	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites. However, putting forward a charge as suggested is not possible in the local plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Protecting existing employment land	Objection to requiring evidence of marketing employment sites before a change of use can occur.	Noted. However it is considered that a policy which would seek to protect existing employment sites is justified. Protecting employment space is an important part of the sustainability of places, and for meeting the needs of the economy. It is considered that a policy seeking protection is justified. Further information is provided in the Jobs topic paper.
Protecting existing employment land	Objection to the arbitrary protection of employment space which is not needed.	Noted. However it is considered that a policy which would seek to protect existing employment sites is justified. Protecting employment space is an important part of the sustainability of places, and for meeting the needs of the economy. It is considered that a policy seeking protection is justified. Further information is provided in the Jobs topic paper.
Accessibility	Employment opportunities in the area should be accessible by sustainable and active modes of transport	Noted. The identification of site allocations in the Preferred Options report has considered the relationship with the transport network and sustainable travel opportunities.
Climate change	Assess existing employment space to review performance against proposed carbon reduction measures in the Plan	Noted. Policy approaches proposed in the climate change theme would seek for new employment developments to respond to climate change including addressing carbon impacts.
Climate change	The new Local Plan should seek to encourage local businesses to reduce their carbon footprint	Noted. Policy approaches proposed in the climate change theme would seek for new employment developments to respond to climate change including addressing carbon impacts.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Climate change	Support the protection of employment space to reduce commuting distances and the associated impacts on the environment.	Noted. As well as responding to the need for new sites, policies are proposed which would seek to protect existing employment sites, particularly for industrial employment in Cambridge.
Allocating new employment land	The Local Plan should seek to provide a wide range of employment opportunities in different sectors to ensure a robust economy	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Allocating new employment land	Ensure the new Local Plan supports a wide range of sectors, not just technology and science sectors	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Allocating new employment land	The new Local Plan should allocate additional land for general industrial uses.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	Additional employment land should be allocated to ensure existing business can continue to stay in the area where they are required to relocate.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Allocating new employment land	Provide appropriate locations which encourage and support local small and start-up businesses	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Policy approaches are also proposed regarding affordable work space and work hubs. Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Allocating new employment land	There is a need for ‘transfer’ warehousing outside of Cambridge, to transfer good onto smaller vehicles for access into the city	Noted. The Transport theme includes a section and policy approach related to freight and delivery consolidation.
Allocating new employment land	Need for smaller manufacturing / production premises in village locations outside of Cambridge to support demand	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	Additional employment allocations should be made (with reference to a number of site specific proposals.)	Noted. A range of site specific proposals have been referenced in representations to this question. Sites suggested have been tested through the Housing and Employment Land Availability Assessment.
Allocating new employment land	The new Local Plan should encourage more flexible employment spaces.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Policy approaches are also proposed regarding affordable work space and work hubs. Further information can be found in the strategy theme of the preferred option report, and the accompanying strategy topic paper.
Allocating new employment land	North East Cambridge represents a significant and unique opportunity to create a new and innovative high-density, high quality, mixed use Quarter for Cambridge and its surrounding area	Noted. North East Cambridge is included in the preferred approach set out in the Strategy chapter of the preferred options report.
Change of use	Planning policy should support the effective use of land for new development, by allocating housing growth on under-utilised employment areas.	Noted. The Employment Land Review (2020) has reviewed existing employment sites and allocations to consider if they warrant continued allocation or protection, and the findings are reflected in the Proposed Options Report.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Change of use	Support the removal of employment uses from the area, to be replaced by no development, to reduce water usage	Noted. In accordance with the requirements of national planning policy and guidance, the new Local Plan should seek to meet the growth needs of the area unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The plan has been informed by a range of evidence, including considering the impact of development ion the environment. The Employment Land Review (2020) has reviewed existing employment sites and allocations to consider if they warrant continued allocation or protection, and the findings are reflected in the Proposed Options Report. Water availability is an important issue for the plan, and an Integrated Water strategy has been commissioned to inform the plan.
Retail	Replace all edge of centre retail sheds with housing to support the City Centre	Noted. The retail polices proposed under the jobs theme will be informed by an updated assessment of the retail needs of Greater Cambridge.
Retail	Support for the allocation of additional land for supermarkets in Trumpington	Noted. The retail polices proposed under the jobs theme will be informed by an updated assessment of the retail needs of Greater Cambridge.
Retail	Objection to the development of out of town shopping areas	Noted. The retail polices proposed under the jobs theme address this issue, and propose to continue a sequential approach which seeks to focus development into town centres.
Retail	Support for the creation of small shopping arcades which support small retail units	Noted. The retail polices proposed under the jobs theme address this issue, proposing ways to support retail during a period of rapid change in retail habits.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Retail	Support the conversion of shops to housing / offices where the need for physical retail premises is declining	Noted. The retail polices proposed under the jobs theme address this issue. It is considered important to keep town centres as active and viable places, therefore the approach proposes to seek to maintain a range of uses, and in some areas restrict changes to residential where planning permission is required. Further information can be found in the Jobs topic paper.
General policy recommendations	Ensure new residential developments support home working	Noted. The Infrastructure theme of the preferred options report proposes a policy approach which would require the provision of high quality broadband services in new development proposals to support opportunities for homeworking.
General policy recommendations	Incorporate industrial (i.e. b1c) accommodation within a mixed use development	Noted. The major development sites proposed in the Preferred Options Report are to include a range of housing and employment types.
General policy recommendations	The economy of the area should be supported by the provision of high quality education	Noted. The Infrastructure theme of the preferred options report considers infrastructure needs related to education. The jobs theme also proposes a policy approach related to faculty development.

Question 27: How should we balance supporting our knowledge-intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	There is a requirement for a range of job opportunities, in urban and more rural areas. The Local Plan policy framework needs to provide for a full range of opportunities	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments.
Allocating new employment land	Support for the provision of a range of size and type of units and facilities for pilot plants as well as future production facilities	See response above
Allocating new employment land	Availability of suitable sites and premises in excellent locations outside of Cambridge is a key factor in spreading the economic growth.	See response above
Allocating new employment land	It would be inappropriate to actively encourage inward investment from sectors unrelated to the knowledge cluster through specific land allocations in the Plan	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Whilst the preferred options seeks to support the high technology cluster, it also seeks to deliver a range of other jobs to provide access to employment to a range of people.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Allocating new employment land	The new Local Plan should focus high-tech knowledge intensive sectors in Cambridge City, and allocate other sectors in new settlements outside the city.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. The high tech sectors can be found in a range of locations across greater Cambridge, and the proposed options seeks to respond with a range of suitable policies.
Allocating new employment land	Sites for manufacturing, storage and distribution which are not particularly well-suited to a city centre or urban edge location, should be allocated in the new Local Plan, close to major transport links and public transport, but also close to houses for the work force.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. This includes proposal for industrial uses and warehousing.
Location of employment land	Concern about the proliferation of science/business parks dotted around the rural fringes of Cambridge. Collectively they are having a significant impact on travel patterns (exacerbated because some of them are poorly located for public transport or cycling) and the previously rural character of the area.	Noted. Noted. The development strategy proposed has considered the relationship between homes and jobs, as well as access to sustainable forms of transport. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Developing growth sectors	The new Local Plan should support AI, science and technology, and biomedical clusters to locate in the area and develop local supply chains.	Noted. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Developing growth sectors	The new Local Plan should support growth in the AgriTech research and development sector	Noted. It is not considered that there is a need for a specific major site for agritech in Greater Cambridge.
Developing growth sectors	Seek to develop a low carbon / green technology cluster of companies that develop approaches to reducing our impact on the environment	Noted. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.
Growth needs in the area	There is a local shortfall in floorspace for industrial and warehousing/logistics operators. The new Local Plan should support the location of the logistics sector in the area.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. This includes proposal for industrial uses and warehousing.
Growth needs in the area	An economic development assessment is required to analyse current employment patterns and existing skills profiles in the area.	In accordance with national planning policy and guidance, the new Local Plan should seek to allocate sufficient employment land to meet the needs of the area. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.
Growth needs in the area	The new Local Plan should seek to support the need of lower skilled workers in the areas.	See response above
Growth needs in the area	There is a need to encourage more skilled & semi-skilled blue collar employment.	See response above

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Growth needs in the area	Based on economic growth projections, the existing provision of locations for mid-tech clusters in the area would be full during the Plan period. There is therefore a need to allocate additional employment land in the new Local Plan to accommodate mid-tech clusters.	In accordance with national planning policy and guidance, the new Local Plan should seek to allocate sufficient employment land to meet the needs of the area. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.
Growth needs in the area	There is a need for small premises to be located in towns and villages throughout the area to support small businesses.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of sites are proposed at villages, along with policies to support windfall sites coming forward.
Growth needs in the area	Objection to economic growth in this area. Growth should instead be located in North Wales or in the north of England.	In accordance with national planning policy and guidance, the new Local Plan should seek to allocate sufficient employment land to meet the needs of the area. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Transport	Need to encourage working patterns which support reduced travel and the use of more sustainable modes of transport	Noted. The development strategy proposed has considered the relationship between homes and jobs, as well as access to sustainable forms of transport. Further information can be found in the strategy theme of the preferred options report, and the accompanying strategy topic paper.
Economic linkages	Huntingdonshire District Council will be pleased to work collaboratively with Greater Cambridge to encourage linkages to Huntingdonshire and in particular Alconbury Enterprise Zone and supply chains in terms of Huntingdonshire's advanced manufacturing industry	Noted. Discussions with neighbouring authorities have continued, and have been captured in the evidence on duty to cooperate accompanying the preferred options report.
Retail	Support for affordable retail rents and lower rates. The Local Plan should seek to ensure all types of businesses can afford to locate in the area.	Noted. While much of this issue may be beyond the scope of the plan, the Jobs theme does include a policy approach regarding affordable business space.
Job creation	The new Local Plan should encourage flexible jobs, part time jobs, supporting people with varying needs	Noted. The Proposed options report includes policy approaches regarding creative industries.
Job creation	Support the creation of creative jobs in arts and culture in the area, and jobs which connect people with nature and the land.	See response above

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Proposed growth locations	The expansion of Papworth Business Park to the east is considered an appropriate location for B1, B2 and B8 uses	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Proposed growth locations	The redevelopment of the Travis Perkins site for a high density mixed-use development	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Proposed growth locations	Supporting the development of a dedicated AgriTech park at Hinxton	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Proposed growth locations	Redevelopment of areas around Cambridge central station for high quality offices	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Proposed growth locations	Development of land at Capital Park provides an opportunity for a variety of commercial developments	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Proposed growth locations	Redevelopment of Kett House and 10 Station Road for a high density commercial-led development	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Proposed growth locations	Gas Field, Madingley Road provides an opportunity for a variety of commercial developments	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Proposed growth locations	Support for employment related development at Cambridge East	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Proposed growth locations	Support for the Lolworth Developments Ltd's (LDL) 100 ha employment site proposal for storage and distribution close to Cambridge	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Proposed growth locations	Endurance's site at Melbourn is the perfect example of a site suited for delivering these non-traditional types of business for Cambridgeshire	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Environment and climate change	The new Local Plan should encourage market gardening and farming to produce local food and reduce food miles.	Noted. In some ways this is beyond the scope of the Plan, but the open space policies can consider the need for allotments and other types of open space.
Environment and climate change	Support the development of wind turbines in the area	Noted. The Climate change theme proposes a policy approach regarding renewable energy proposals, including the approach to wind energy.
Environment and climate change	The new Local Plan should support the creation of jobs in the green, sustainable economy (e.g. recycling, sustainable food products).	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments.
Environment and climate change	New businesses being established in the area should be required to maintain biodiversity and reduce carbon emissions.	Noted. Both these issues are addressed in the preferred options report.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Environment and climate change	The new Local Plan should seek to encourage support chain companies which will support existing companies, and reduce the distances required to transport goods.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocation which would add to existing commitments. The report also proposes a policy approach to support delivery consolidation.
Miscellaneous	The new Local Plan should support the creation of community centres where people can learn new skills while also seeking to address loneliness and mental health issues.	Noted. The wellbeing and social inclusion section of the preferred options includes policy approaches which would seek address needs for community facilities, and deliver meanwhile uses.
Miscellaneous	The Plan should require new businesses to create links with local schools and colleges.	Noted. This is beyond the scope of the Plan, but the Jobs section of the Preferred Options Report does propose a policy approach which would seek to widen the job opportunities created by new development.

Question 28: In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	New Local Plan should support a range of businesses located at South Cambridgeshire villages, in both small premises and business parks or industrial estates	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of sites are proposed at villages, along with policies to support windfall sites coming forward.
General comments on growth locations	Spread employment space throughout the area in a dispersed manner to spread the economic benefits, reduce pressure on Cambridge City infrastructure, and potentially reduce commuting distances.	
General comments on growth locations	Plan for new business space or flexible co-working space in and adjacent to neighbourhoods or villages, thereby reducing the need to travel.	
General comments on growth locations	Recommend a dispersal strategy moving jobs away from Cambridge city and into the key rural centres.	

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	Locations with high levels of public transport access should be identified for business uses. This would include sites within walking distance of train stations, travel hubs and along transport corridors	Noted. The development strategy proposed has considered the relationship between homes and jobs, as well as access to sustainable forms of transport. Further information can be found in the strategy theme of the First Proposals report, and the accompanying strategy topic paper.
General comments on growth locations	Locations with high levels of public transport access should be identified for businesses with high employment densities	
General comments on growth locations	Support the location of employment growth on public transport corridors	
General comments on growth locations	Growth locations should be accessible by active and sustainable travel modes	
General comments on growth locations	The edge of the city is likely to need to be the focus for future employment growth. To achieve the most sustainable commuting patterns, housing similarly needs to be located on the edge of the city	Noted. A number of sites on the edge of Cambridge are proposed in the First Proposals Report along with policies to support windfall sites coming forward.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	Seek to co-locate new employment and housing in new settlements	Noted. A range of sites are already identified as commitments in our new communities, and the First Proposals Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of opportunities for new employment are proposed within or alongside new communities along with policies to support windfall sites coming forward.
General comments on growth locations	Support the location of new employment land in new communities	See response above
General comments on growth locations	Support the allocation of employment clusters that provide for a range of users, including B1c, B2 and B8 in close proximity to major road networks at the edge of villages or in close proximity to services and existing employment uses	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites in a number of different locations across Greater Cambridge by responding to the recommendations of the Employment Land Review (2020).

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	Support the allocation of growth near larger settlements and good transport links	Noted. The development strategy proposed in the Preferred Options Report considers the location of homes relative to jobs and sustainable transport infrastructure. Further information can be found in the strategy section of the plan, as well as the Strategy Topic Paper.
General comments on growth locations	The creation of clusters requires companies to be close together, and not located within separate settlements.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of opportunities for new employment are proposed close to existing employment clusters along with policies to support windfall sites coming forward.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	The new Local Plan should seek to locate employment land close to residential areas in order to reduce required commuting distances in the area.	Noted. The development strategy proposed in the Preferred Options Report considers the location of homes relative to jobs and sustainable transport infrastructure. Further information can be found in the strategy section of the plan, as well as the Strategy Topic Paper.
General comments on growth locations	Support for growth in South Cambridge	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of sites are proposed to the south of Cambridge along with policies to support windfall sites coming forward.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	Only support growth located on brownfield sites	Noted. Use of previously developed land is an important factor, but the plan has to balance a range of issues. Through the Housing and Employment Land Availability Assessment opportunities for brownfield development have been considered. The development strategy proposed in the preferred options has considered brownfield land opportunities alongside a range of other factors. The allocations proposed in the preferred options report include some major brownfield sites, but also some greenfield sites.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	Objection to locating employment growth on greenfield sites	Noted. Use of previously developed land is an important factor, but the plan has to balance a range of issues. Through the Housing and Employment Land Availability Assessment opportunities for brownfield development have been considered. The development strategy proposed in the preferred options has considered brownfield land opportunities alongside a range of other factors. The allocations proposed in the preferred options report include some major brownfield sites, but also some greenfield sites.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General comments on growth locations	Objection to further expansion at Cambridge Biomedical Campus, and land to the south of Addenbrooke's Road. More appropriate sites are available in other areas.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Particular issues regarding the Cambridge Biomedical Campus are explored in the strategy theme and topic paper, where an allocation is proposed to respond to the long term needs of the site.
General comments on growth locations	Objection to further employment growth of any kind in the area, in order to protect the environment	Noted. The Local Plan seeks to continue to support the important Cambridge economy, whilst also considering housing and other infrastructure needs, as well as the impact on the environment. A range of evidence has informed the preferred options report, and the preferred options report provides the opportunity to respond to the approach proposed for the new local plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Types of employment sites / space	The new Local Plan should seek to allocate a range of sizes and types of sites, some located close to existing clusters, others in new settlements and villages.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites in a number of different locations across Greater Cambridge by responding to the recommendations of the Employment Land Review (2020).
Types of employment sites / space	More community scaled facilities for start-ups and incubators should also be encouraged within new or expanding housing areas and employment areas	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as local work hubs.
Types of employment sites / space	Flexible and co-working spaces in villages	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as local work hubs.
Types of employment sites / space	New Local Plan should allow for new business space, or flexible co-working space, in neighbourhoods or villages to help reduce the need to travel and support the net zero carbon aspirations	Noted. The Jobs theme in the Preferred Options Report includes policy proposals regarding affordable workspace as well as local work hubs.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Types of employment sites / space	There is now an established demand from across the ‘mid-tech’, ‘high technology’ and ‘bio tech’ industries (amongst others) for hybrid business units that cater for a mix of business needs	In accordance with national planning policy and guidance, the new Local Plan should seek to allocate sufficient employment land to meet the needs of the area. Informed by the Greater Cambridge Employment Land Review (2020), the preferred options report responds to the employment land needs identified.
Types of employment sites / space	Support homeworking by providing dwellings with flexible spaces, good broadband services, and local cafes or co-working spaces	Noted. The Infrastructure theme of the preferred options report proposes a policy approach which would require the provision of high quality broadband services in new development proposals to support opportunities for homeworking, the homes theme addresses adaptions to homes that may be needed and the jobs theme includes policies to support home working and local employment hubs.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Types of employment sites / space	Provision of affordable workspaces with subsidised or low-rent for small businesses and start-ups, and short-term premises for pop-ups.	Noted. The Jobs theme in the First Proposals Report includes policy proposals regarding affordable workspace as well as local work hubs.
Types of employment sites / space	All new developments should include some flexible employment space	Noted. A range of sites are already identified as commitments, and the First Proposals Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). Policy approaches are also proposed regarding affordable work space and work hubs. Further information can be found in the strategy theme of the First Proposals report, and the accompanying Strategy topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Types of employment sites / space	It is essential that a range of business and industrial space is provided. This should include space for start-ups (for those business in the early stage of a new business), Incubator (providing start-up and scale-up space for companies, including support and services) and grow-on space (premises suitable for small growing businesses). The plan should be flexible to adapt to changing working practices and respond quickly to opportunities for specialist space.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites in a number of different locations across Greater Cambridge by responding to the recommendations of the Employment Land Review (2020). Policy approaches are also proposed regarding affordable work space and local work hubs.
Specific growth locations recommended	Taller prime office buildings could locate at Cambridge's railway stations to focus development at transport hubs; keeping the city compact, but supporting the demand for high quality office space, particularly that arising from a cluster of knowledge intensive and artificial intelligence firms around Cambridge Central station	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	A new settlement at Station Fields has the ability to provide new local employment opportunities	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	The expansion of Papworth Business Park to the east is considered an appropriate location for B1, B2 and B8 uses	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	We would encourage further employment land allocations at Cambourne as part of such an approach.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	The Land east of Long Road, Comberton could deliver both modern homes, that have been designed to allow working from home, as well as new modern business/flexible co-working space for the wider community.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Brickyard Farm, Boxworth site offers a unique and essential opportunity to address the gap in supply to meet particular needs and requirements of the logistics sector.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Support employment growth at Cambourne alongside the introduction of new infrastructure, including the East West Rail and the Cambridge Autonomous Metro.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Cambridge Science Park North should be allocated to provide skilled manufacturing and development of science and technology products linked to research and development	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Supporting the development of a dedicated AgriTech park at Hinxton Grange	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Allocate land north-east of Villa Road, Histon, for uses associated with the AgriTech or high-tech sector to complement the established firms that are located within Vision Park and NIAB's crop research facilities at Park Farm.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Development of land at Capital Park provides an opportunity for a variety of commercial developments	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support the redevelopment of the Barrington cement works is an opportunity for heavier industrial units.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Land at Ely Road, Milton site has the potential to provide office space close to the Science Park for employment use either as part of a mixed use residential allocation, or as a satellite employment allocation in its own right.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Provide new B1 uses as part of a comprehensively planned mixed-use community on the edge of Cambridge	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Gas Field, Madingley Road provides an opportunity for a variety of commercial developments	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support for employment related development at Cambridge East. The principle of residential and employment uses have already been established at Cambridge East through the AAP and this site is the primary candidate for large-scale mixed use development that can meet a range of employment needs.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Support for the Lolworth Developments Ltd's (LDL) 100 ha employment site proposal for storage and distribution close to Cambridge, on land between Bar Hill and the new settlement of Northstowe.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Hybrid business units at Trinity Hall industrial estate	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	A new community proposed at the Six Mile Bottom Estate would provide for jobs and homes significantly reducing the need for car journeys	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support for residential and employment development at Foxton, adjacent to Foxton station.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Proposed employment hub of 1 hectare on land adjacent to Balsham Road, Linton	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Endurance Estate's site at Melbourn should be been identified as a suitable site to be allocated as a mixed-use business park within the emerging Local Plan.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Support employment growth at Northstowe	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support employment growth at Fulbourn and Abington Park Farm	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Support employment growth at Cottenham, Melbourne and Sawston	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support employment growth on land to the south of the A14 services	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Support employment growth at Stapleford and Great Shelford	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

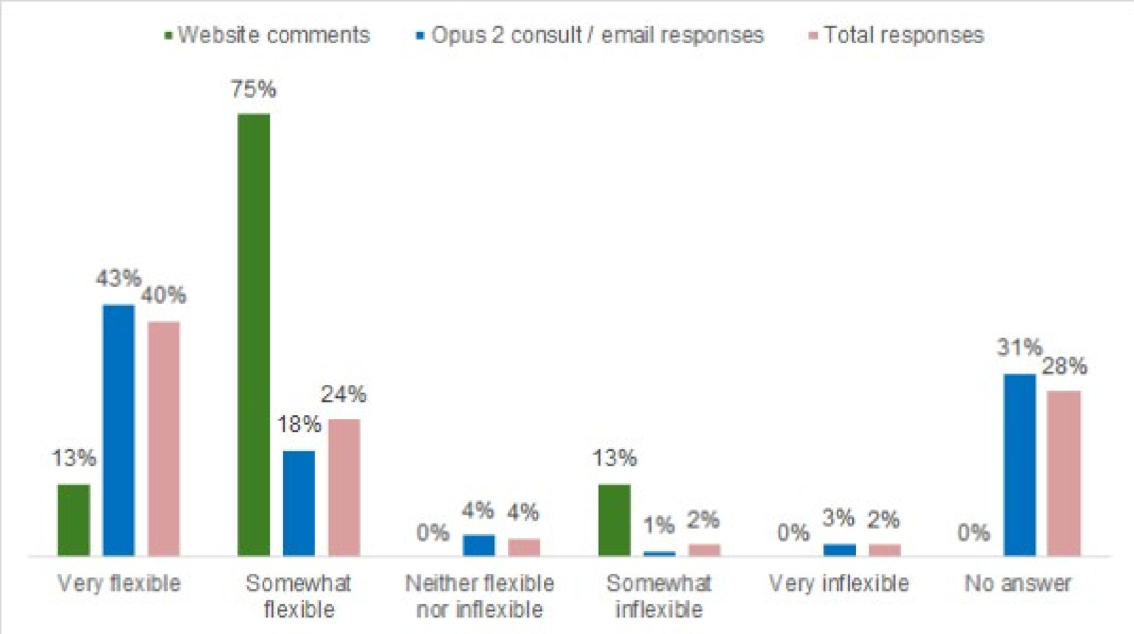
Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support for the allocation of a strategic scale logistics site at the Crow Green junction of the A1198 / A428.	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Specific growth locations recommended	Support for the allocation of a major new General Aviation and aerospace cluster ("AvTech") at Duxford	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Specific growth locations recommended	Support for employment growth in south Cambridge, including villages such as Duxford and Whittlesford	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Important existing employment areas	Existing Science Parks are important sites, and for medical science the area around Addenbrookes is important. The Genome campus, Granta Park, and just across the border with Essex Chesterford Park, are all important existing employment sites. Melbourne Science Park should also be considered in the Plan.	Noted. A range of sites are already identified as commitments, and the Preferred Options Report seeks to add to those sites by responding to the recommendations of the Employment Land Review (2020). A number of sites are proposed are adjacent to existing science and research parks.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Important existing employment areas	Melbourn Science Park, Granta Park and Cambridge Innovation Park, currently have available space or the potential for further growth	Noted. The Employment Land Review (2020) has considered the needs of different sectors, and the plan responds with allocations which would add to existing commitments. Proposals have been considered through the Housing and Employment Land Availability Assessment.
Important existing employment areas	Is it really a good idea to lose the specialist engineering employment opportunities which Cambridge Airport and Marshalls currently provides?	Noted. The relocation of Marshalls is outside the control of the Local Plan. However, the Strategy section of the First Proposals document seeks a mix of employment uses on the Cambridge East site.
Economic links with surrounding areas	Consider links with economic growth areas in Essex	Noted. Through the requirements of the Duty to Cooperate, the Council will consider the strategic cross boundary links with surrounding areas. This will include economic links.
Retail	Encourage retail growth in Cambridge City Centre for small independent businesses by lowering rates	Noted. The policy approach proposed in the Jobs theme regarding retail and centres seeks to respond to this point.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Policy recommendations	Business locations should not adversely impact residential areas in relation to visual and traffic impacts	Noted. The policy approach proposed in the Jobs theme regarding new employment development seeks to respond to this point.
Miscellaneous	Protect existing shops and schools in South Newnham Neighbourhood Area	Noted. The policy approach proposed in the Jobs themes supports the retention of retail uses on high streets and in local communities. Education will be explored by the Infrastructure Delivery Plan.

Question 29: How flexible should we be about the uses we allow in our city, town, district, local and village centres?



8 website comments and 77 Opus 2 Consult/email responses were received to this question.

Most respondents felt we should be flexible, with 64% overall answering very or somewhat flexible. Website commenters strongly felt that some, but not a lot of flexibility was preferable, although there were relatively few respondents to this question.

88% of website commenters (8 in total), and 57% of Opus 2 Consult/email respondents (77) left a written comment.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Supporting a range of uses	Policy can help to support a range of business types, from a flexible range of unit types and sizes (including for start-ups and Small and Medium Sized Enterprises), specialist uses like commercial laboratory space, hybrid buildings capable of a mix of uses, incorporating offices and manufacturing uses, to shared social spaces, for example central hubs, cafes.	The needs of the Greater Cambridge Economy have been carefully considered when developing the preferred options. The Councils commissioned a Greater Cambridge Employment Land Review (2020) which explored potential jobs growth, and the need for different types of employment land in terms of quantity, type and location. Policies and proposals in the preferred options seek to respond to the needs identified, and a range of policies in the preferred options address the issues such as shared social spaces.
Supporting a range of uses	Seek to ensure that the Local Plan meets the varied employment needs of the area.	The needs of the Greater Cambridge Economy have been carefully considered when developing the preferred options. The Councils commissioned a Greater Cambridge Employment Land Review (2020) which explored potential jobs growth, and the need for different types of employment land in terms of quantity, type and location
Flexibility for change	Enable town centres to be flexible to response to changes in the future.	Noted. The retail polices proposed under the jobs theme address this issue. It is considered important to keep town centres as active and viable places, therefore the approach proposes to seek to maintain a range of uses, and in some areas restrict changes to residential where planning permission is required. Further information can be found in the Jobs topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Flexibility for change	Changing retail habits should allow for alternative uses to be provided in central areas, such as more leisure, residential and office uses.	See response above
Flexibility for change	Support the reductions in policy requirements / burdens when seeking changes of use.	See response above
Flexibility for change	Policies need to be flexible to allow centres to define their own identities.	See response above
Flexibility for change	Flexibility may be needed to support tourism.	See response above
Flexibility for change	Support the use of vacant retail premises for the display of art.	See response above
Flexibility for change	Support for more conversion of retail premises to residential uses.	Noted. The retail polices proposed under the jobs theme address this issue. It is considered important to keep town centres as active and viable places, therefore the approach proposes to seek to maintain a range of uses, and in some areas restrict changes to residential where planning permission is required. Further information can be found in the Jobs topic paper.
Flexibility for change	Objection to flexibility to change in Cambridge City Centre, where the character of some areas can be detrimentally affected by alternative uses.	Noted. The retail and centres policy approach proposed in the jobs theme seeks to support the adaption of centres in light of changing retail habits. Any changes requiring planning permission would need to consider the impact on character and heritage, and policy proposals on these issues are identified in the Great Places theme.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Support for mixed use developments	Mixed use site allocations should be encouraged, particularly in rural and new settlements	Noted. Major allocations proposed in the preferred options report would seek to deliver mixed use development where day to day needs can be meet on site.
Support for mixed use developments	Mixing uses creates accessible environment through active modes of transport, reducing the need to travel by car.	See response above
Support for mixed use developments	The mix of uses on a site should be appropriate to the context of the surrounding area.	See response above
Design	Support a flexible approach to the density and height of development.	Noted. Approaches to density and height are explored in the Great Places theme.
Design	Any flexibility applied should still seek to protect the character and appearance of the area, and protect heritage assets.	Noted. Town centre proposals would also need to consider heritage issues. The proposed option report includes policy approaches regarding heritage in the Great Places theme.
Vision / strategy for central areas	A clear vision for the city centre is needed with flexible policies to maintain the vibrancy and prevent areas of disused and underused buildings which will harm the attractiveness of the city	Noted. The retail and centres policy approach proposed in the jobs theme seeks to support the adaption of centres in light of changing retail habits.
Provision of services	Ensure that any increased flexibility does not result in the loss of the provision of essential services and facilities in centres.	Noted. The retail and centres policy approach proposed in the jobs theme seeks to strike this balance.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Improving centres / high streets	The new Local Plan should support and encourage improvements to be made to high streets in the area to make them better environments to visit.	Noted. The retail and centres policy approach proposed in the jobs theme seeks to support the adaption of centres in light of changing retail habits.
Improving centres / high streets	The new Local Plan should seek to reduce congestion in centres	Noted. The Greater Cambridge Partnership is exploring city access as part of their role in improving transport infrastructure.
Home working	The new Local Plan should include flexible policies which support home working	Noted. The Infrastructure theme of the preferred options report proposes a policy approach which would require the provision of high quality broadband services in new development proposals to support opportunities for homeworking, and the Jobs theme addresses adaptions to homes that may be needed.
Need for restrictions	There should be restrictions in place for student accommodate and Airbnb	Noted. The policy approach proposed in the Jobs theme regarding visitor accommodation, which specifically seeks to respond to issues relating to short term lets.
Need for restrictions	Ensure the management and control of polluting businesses.	Noted. The policy approach proposed in the Wellbeing and social inclusion theme regarding pollution seeks to ensure issues are fully considered as part of the planning process.
Need for restrictions	Objection to polluting agricultural uses in villages.	Noted. The policy approach proposed in the Wellbeing and social inclusion theme regarding pollution seeks to ensure issues are fully considered as part of the planning process.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Need for restrictions	Seek to restrict the growth in tourism related facilities in Cambridge.	The Preferred options report proposes policy approaches to address visitor accommodation and visitor facilities. It seeks to support the benefits provided by tourism, as well as addressing some of the challenges, particularly in relation to short term lets. The Jobs Topic Paper provides further information, including the approach to preparing further evidence at the next stages of plan making when the impacts of covid19 on the industry can be better understood.
Need for restrictions	Encourage more independent shops, and provide lower rates for independent businesses.	Noted. The policy approach proposed in the Jobs theme regarding retail and centres seeks to respond to this point.
Miscellaneous	The Plan should include a review policy, to ensure the Plan remains up to date.	Noted. National Planning policy requires plans to be regularly updated.
Miscellaneous	Consider how centres could support climate change mitigation and adaptation features, including flood protection and increased planting and green space.	Noted. The issues of responding to climate change and improving green infrastructure are addressed in detail in the preferred options report.
Miscellaneous	Local communities should be actively consulted regarding new development and change of use.	Noted. The Councils' statement of community involvement sets out how the council will engage both in plan making and on planning applications.
Miscellaneous	Support communities seeking to purchase and manage village retail facilities.	Noted. This is largely beyond the scope of the plan, but policy approaches are proposed regarding the protection of important local facilities where they require planning permission.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Miscellaneous	Support for development of brownfield land only.	Noted. Use of previously developed land is an important factor, but the plan has to balance a range of issues. Through the Housing and Employment Land Availability Assessment opportunities for brownfield development have been considered. The development strategy proposed in the preferred options has considered brownfield land opportunities alongside a range of other factors. The allocations proposed in the preferred options report include some major brownfield sites, but also some greenfield sites.

Question 30: What approach should the next plan take to supporting or managing tourism in Cambridge and the rural area?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Restricting tourism	The next local plan needs to develop policy which will constrain tourist numbers.	Noted. The Local Plan cannot restrict the number of tourists visiting the area.
Restricting tourism	Seek to manage tourism by introducing a visitor / tourist tax which would generate additional revenue and restricting the number of tourist coaches entering the city by, for example, requiring all tourist coaches to drop off passengers at Park and Ride sites.	Noted. Taxation is beyond the scope of the Local Plan
Restricting tourism	Seek to reduce visitor number in Cambridge by promoting other areas to visit.	Noted. This is beyond the scope of the Local Plan
Restricting tourism	Restrict the use of houses as AirBnBs	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. Where planning permission is required, the plan will explain the exceptional circumstances when a conversion from residential use to visitor accommodation will be permitted.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Visitor facilities	Support for an increase in visitor facilities in the area, including a hotels, conferencing facilities, cafes, restaurants and gyms.	Noted. The visitor accommodation and retail policies proposed under the jobs theme address these issues. The visitor accommodation policy will respond to the need for new visitor accommodation informed by new needs assessments. New visitor attractions will be supported subject to criteria such as sustainable travel. The retail will continue to support the development of, and where possible protect existing, shops and services.
Visitor facilities	Recommend licensing and regulation of tour guides, clear and co-ordinated signposting of key sites, and effective tourist management at city centre locations.	Noted. This is beyond the scope of the Local Plan
Visitor facilities	Recommend improving and increasing the provision of skateboarding facilities to increase the visitor economy	Noted. The open space policy proposed under the biodiversity and green spaces theme addresses this issue. The open space policy will require open space and recreation provision to be provided by new residential development including space for skateboarding.
Support for growth in tourism	Policies need to support and protect existing tourism facilities whilst allowing for appropriate expansion and development in context with each site.	Noted. The visitor accommodation policy proposed under the jobs theme address this issue. The visitor accommodation policy will protect visitor accommodation and support new visitor attractions subject to criteria such as sustainable travel.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Support for growth in tourism	Development in Cambridge East could provide the opportunity to increase cultural and tourism related activities for the area.	Noted. The visitor accommodation and community facilities policies proposed under the jobs and wellbeing and inclusion themes, respectively address these issues. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel. The community facilities policy will support new cultural facilities.
Support for growth in tourism	Create additional visitor attractions in rural areas, to take the pressure off existing attractions such as local nature reserves.	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel.
Support for growth in tourism	Consider encouraging more overnight visitors, as this has a more positive impact on the economy.	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will respond to the need for new visitor accommodation informed by new needs assessments
Support for growth in tourism	Consider locating tourist accommodation in residential areas to contribute to a loosening of social cohesion	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will respond to the need for new visitor accommodation informed by new needs assessments

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Support for growth in tourism	Support for the development of budget accommodation outside the city to encourage more visitors to the area.	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will respond to the need for new visitor accommodation informed by new needs assessments
Objection to growth in tourism	There should be a reduction in the amount of hotels in the city, to support an increase in residential properties in the city.	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will respond to the need for new visitor accommodation informed by new needs assessments
Objection to growth in tourism	Objection to tourism growth in rural areas, as this could increase the use of cars to access visitor facilities.	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel.
Transport	Support for improving sustainable transport links to tourist / visitor activities and sites.	Noted. The visitor accommodation policy proposed under the jobs theme address this issue. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel.
Transport	Support tourism growth accessible by sustainable modes of transport (train and coach).	Noted. The visitor accommodation policy proposed under the jobs theme address this issue. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Transport	Support for the provision of tourism activities which incorporate sustainable modes of transport (cycle tours for example)	Noted. The visitor accommodation policy proposed under the jobs theme address this issue. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel.
Transport	Tourist coaches should be banned from accessing the City Centre	Noted. This is beyond the scope of the Local Plan
Transport	Recommend expanding park and ride facilities to accommodate future growth in tourism related activities.	Noted. The visitor accommodation policy proposed under the jobs theme address this issue. The visitor accommodation policy will support new visitor attractions subject to criteria such as sustainable travel.
Green and blue infrastructure	Support the retention and improvement of waterways to support tourism. Recommend the production of a Water Space Strategy	Noted. The Greater Cambridge Green Infrastructure Opportunity Mapping Study includes water spaces.
Evidence base / supporting documents	The new Local Plan should be supported by the production of a sustainable tourism plan / strategy.	Noted. The emerging Destination Management Plan (DMP) will be a consideration in the new Local Plan which should consider how tourism can be more sustainable.
Evidence base / supporting documents	The drafting of the new Local Plan should be informed by the emerging Destination Management Plan (DMP) being produced by Visit Cambridge	Noted. The emerging Destination Management Plan (DMP) will be a consideration in the new Local Plan. However, it may be several years before tourism returns to pre-pandemic levels.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Evidence base / supporting documents	Given the amount of hotels built recently in the area, the Council should assess the need for any more hotels in the future.	Noted. The visitor accommodation policy proposed under the jobs theme addresses this issue. The visitor accommodation policy will respond to the need for new visitor accommodation informed by new needs assessments
Retail	Seek to encourage more independent retail stores and businesses.	Noted. The retail policy proposed under the jobs theme address these issues. The retail policy will continue to support the development of, and where possible protect existing, shops and services.
Policy recommendation	Tourism should be assessed using the same sustainability criteria that would apply to other economic benefits.	Noted. All policies in the Local Plan will include a comprehensive assessment based on sustainability criteria.
Miscellaneous	Objection to development in the Green Belt and in the countryside.	Noted. The preferred option strategy seeks to make the best use of brownfield land, but that the scale of development needs requires some additional development to be located on some greenfield sites.

Appendix 2: Cambridge Shopping Centre Retail Evidence Base Response

In April/May 2021, additional stakeholder engagement with Cambridge's three shopping centres was undertaken to better understand their future growth ambitions including the impact of Covid-19. Each centre was asked to submit a short statement about the national and local retail market, how future retail local planning policy should evolve, their current performance compared to before the pandemic and how the shopping centres and the city centre may need to evolve to respond to changes in the retail market and consumer habits. Representations from the Grand Arcade and Lion Yard were received 2 July 2021. These consisted of individual responses along with a joint statement. The contents of these are provided below.

1. Response on behalf of Universities Superannuation Scheme

On behalf of our Client, Universities Superannuation Scheme Ltd ("USS"), we are writing in advance of the Greater Cambridge Shared Planning Service's (GCSP) forthcoming Regulation 19 First Proposals public consultation on the Greater Cambridge Local Plan.

This letter follows a request from GCSP for data and insight into the retail environment in Cambridge and the current and future status of Grand Arcade Shopping Centre to inform the retail evidence base, the Cambridge Retail Study, and the Local Plan. This letter has been drafted in the understanding it will be placed in the public domain.

By way of background, Grand Arcade is Cambridge's leading shopping destination with a selection of over 60 premium and high street retailers located in the historic core of Cambridge City Centre. Grand Arcade is owned and managed by USS and Cambridge City Council is the freeholder.

2. Response on behalf of Barclays Nominees (Lion Yard) Ltd c/o Aberdeen Standard Investments

On behalf of our Client, Barclays Nominees (George Yard) Ltd c/o Aberdeen Standard Investments ('ASI'), we are writing in advance of the Greater Cambridge Shared Planning Service's (GCSP) forthcoming Regulation 19 First Proposals public consultation on the emerging Greater Cambridge Local Plan.

This letter follows a request from GCSP for data and insight into the retail environment in Cambridge and the current and future status of Lion Yard Shopping Centre to inform the retail evidence base, the Cambridge Retail Study, and the Local Plan. This letter has been drafted in the understanding it will be placed in the public domain.

By way of background, Lion Yard is a key shopping destination located in the historic core of Cambridge City Centre. Lion Yard is owned as above and managed by ASI with Cambridge City Council as the freeholder.

3. Joint Statement between Grand Arcade & Lion Yard Shopping Centres

A joint statement Universities Superannuation Scheme Ltd (USS, owners of Grand Arcade Shopping Centre and Barclays Nominees (Lion Yard) Ltd c/o Aberdeen Standard Investments (ASI), owners of Lion Yard Shopping Centre, has been prepared which sets out the joint view as to what is required to ensure the continued and future success of Cambridge City Centre.

This focuses on an overview of the retail environment, Cambridge's retail market, the need for flexibility in emerging planning policy and the Cambridge Retail Study.

This note then goes on to set out the specific impacts of structural changes in the retail market and the pandemic on Grand Arcade.

Retail environment – current national trends

The recent structural changes in retail have been well publicised; retail is evolving as a result of technological innovation and changing consumer preferences. Such change, however, has been amplified by the COVID-19 pandemic ('the pandemic').

The true impact of the pandemic is yet to play out on our high streets, in town centres and shopping centres, however, it has already been recognised that it has accelerated and decelerated a number of existing trends including [What next for the high street? Part Two: A revival, Deloitte LLP, January 2021]:

- Increased focus on localism;
- Greater commitment to small (local) independent businesses;
- The development of re-commerce and independent fashion operators in response to fast fashion and environmental concerns;
- More focused shopping trips;
- More value placed on the self and socialising rather than consumerism;
- Increased number of Company Voluntary Agreements (CVAs); and,
- Oversupply of retail space.

All this points to retail currently being in a state of flux. Shops have been closed for much of the past year resulting in reduced footfall, a further increase in online shopping, permanent closure of stores, loss of jobs, rent holidays and the reduction in value of shopping centre assets. This has exacerbated an already struggling market.

It is predicted that “the upheaval facing retail still has some distance to run and things are likely to get worse on high streets, shopping centres and retail parks before they start to get better” [What next for the high street? Part one: The way things are now, Deloitte, January 2021]

It is however recognised that despite this upheaval, there is an exciting albeit different future for our high streets and town centres, if changes are embraced. The key is to recognise the need for and to embrace flexibility of uses, as has been promoted in national planning changes.

Impact on space requirements

One of the major structural issues within the retail industry is the oversupply of retail and leisure space, supply is currently outstripping demand. Administrations and CVA’s are continuing. There is recognition that space within our high streets need to be repurposed, bringing a wider mix of uses to ensure the future vitality and viability of traditional retail areas to entice shoppers back to the city centre rather than remain online. Evidence from the Local Data Company shows how stores have been closing at an increased rate since 2012.

The recognition of oversupply (see Figure 1 below) should be reflected in the emerging Cambridge Retail Study given the timeframes since the publication of the last Retail Study (2013).

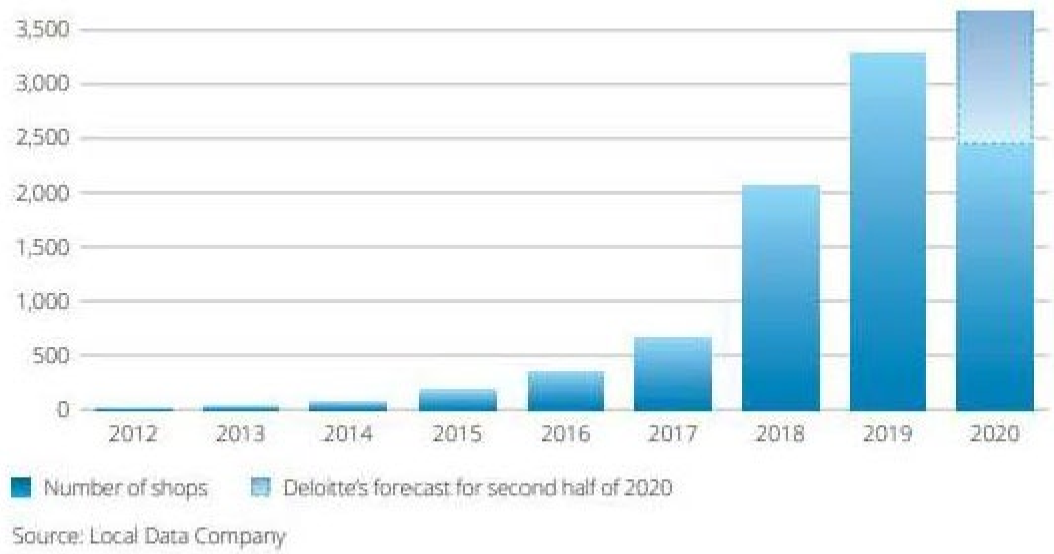


Figure 1: Number of shops demolished or permanently removed from the market (2012 to H1 2020); Source: What next for the high street, Part Two: A Revival, Deloitte, January 2021

An increasing amount of occupiers report that retailers want to pay rent as a percentage of income rather than a fixed rent. Furthermore, rather than re-negotiate leases, retailers are vacating premises at the end of the lease and waiting until a suitable or preferable location becomes available in a centre given the increase in vacant units. In the meantime, they rely on their online presence. Other occupiers are going online only, such as the recent announcement by GAP.

The declining demand for retail space and the need to re-purpose stores, emphasises the responsibility to ensure flexibility in both uses and space in town centres to help them not only survive but to thrive both in the current climate and in the future.

There is a need to address these changes and to meet the demand for other uses that will contribute to the vitality and viability of our centres. This means looking to the future, not the past, in how we plan for our town centres.

If a flexible approach is not taken, Cambridge City Centre will not be able to react and evolve in line with emerging trends. This will result in it struggling to attract both visitors and retailers.

Impact on Shopping Centres

Research undertaken by Deloitte sets out that shopping centres appear to have been hit the hardest by the changes to the retail sector [What next for the high street? Part one: The way things are now, Deloitte, January 2021] with a current vacancy rate of 15.6% (similar to 2013 levels), as shown below in Figure 2.

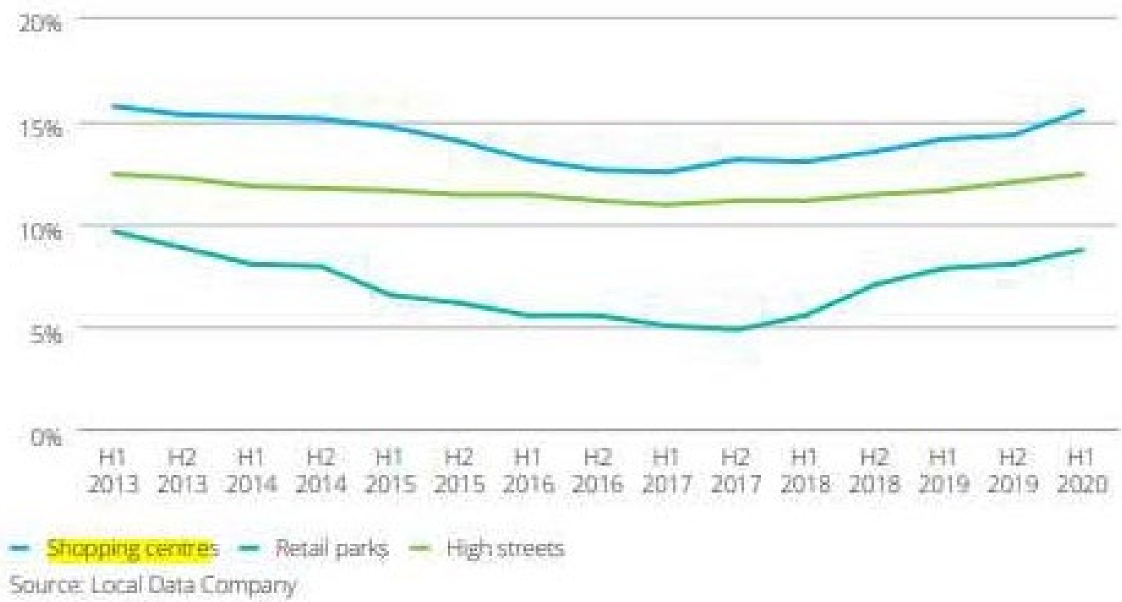


Figure 2: Vacancy rate by location type; Source: What next for the high street, Part Two: A Revival, Deloitte, January 2021

“Shopping centres are as fragile as city centres and will need to work hard to recover permanently the ground they have lost over recent months if, indeed, that is possible”. In particular, it is thought they will need to work harder than high streets to keep the experience attractive and relevant to their customers. This has been amplified by department stores, the anchors of shopping centres, having been particularly hard hit and becoming increasingly difficult to sustain, “since the start of 2012, 726 department stores have closed down with more than 40% of them located in high streets and town centres”. [What next for the high street? Part one: The way things are now, Deloitte, January 2021]

Often, shopping centres have historically relied on flagship stores to drive footfall and attract occupiers. They are dependent on footfall and consumers making a specific trip.

The future of department stores has been mixed; some have remained closed while others are in the process of being repurposed. Making them viable is challenging given their inherent existing use value and therefore the support of a pro-active Local Authority is essential.

The use of traditional retail space for alternative uses must be accepted, promoted and supported to ensure that the space can be repurposed and contribute to the vitality of the town. Such uses include repurposing for residential, offices, leisure (such as Debenhams, Oxford Street), hotels, cinemas or life sciences.

Recent case studies of alternative use strategies for department stores include the Rylands Building (a former Debenhams store) and the Kendal Milne Building (former House of Fraser) in Manchester (both listed). A planning application for The Rylands Building sought to carve up the building into a shopping arcade on the ground floor, with the bulk of the building to become offices. Planning permission for the Kendal Milne Building includes the conversion, alteration and extension of the building and the erection of a 14-storey building to the rear and multi storey car park. Commercial units will be located on the ground floor supported by upper floor offices.

The department stores that continue to operate, are being underpinned by preferential commercial terms by landlords to enable such large retail operators to operate. The impact of this on landlords should not be underestimated and a department store’s presence should not be taken for granted. There is also a need to recognise that just because one department store has closed in one centre e.g. John Lewis in Peterborough, it does not necessarily follow that shoppers will automatically visit other nearby retail centres which still have a department store. The recent decline in the number of department stores operators and stores themselves attests to the fall in demand for department stores. It is the mix of uses that will entice visitors who can add a visit to a department store as part of a day out.

Furthermore, retail agents are also reporting the following trends in demand for space in shopping centres as a result of recent changes. We expect this will evolve during the period to adoption of the Local Plan:

- Increase in NHS/GP surgeries;

- More office space;
- Garden Centres within shopping centre car parks;
- Demand for new job centres;
- New leisure concepts;
- Last mile logistics;
- Dark kitchens (moped access required);
- Student accommodation;
- Hotels;
- Serviced apartments (e.g. Edinburgh St James);
- Other tech/apps entering the market – e.g. Weez who have started in London but are now looking at regional cities.

There is increasing demand and opportunities for alternative uses in shopping centres, often at reduced rents. There are also additional pressures from environmental, social and governance (ESG) on leases. This pressure is felt by both landlords and tenants to address sustainability requirements which has an added pressure to tight margins.

Cambridge Retail Market

Cambridge is recognised and renowned for being a successful retail destination both nationally and internationally (one of its many attributes). It is a top retail destination due to the affluent population, student population, tourist draw and international business alongside its historic charm which continues to draw visitors.

Cambridge is, however, not unaffected by the changes to the structure of retail or the pandemic. Whilst it has historically benefitted from low vacancy rates, these rates have increased. Like the national picture, there are too many retail units in Cambridge. Many of these are small units in historic buildings which do not meet the needs of national retailers. The listed nature and planning restrictions often result in the occupancy being challenging.

Recently the Cambridge City Centre Business Improvement District ('BID') has focused on supporting locals and independents to occupy these units and to encourage increased take up. However, a cautionary note is often high business rates are seen as a barrier to entry.

In addition, the significant reduction in tourists/students throughout the pandemic has had an impact on the city centre resulting in reduced revenue/footfall. Whilst, there has been an increase in the number of staycations, this has not mitigated the impact of reduced international tourism which is supported by the reduction / removal of taxes on goods. It will be important to track the level of international tourist and student spend once the pandemic has passed and what this means for Cambridge.

The recent announcement of the Grafton Shopping Centre being put up for sale and the indication that it may be converted to alternative uses, highlights the difficulties of the retail market in Cambridge. This further strengthens the importance of the historic core as the centre for retail and leisure uses that drive footfall and provide the entertainment core for the city centre.

Travel, car parking and the associated high parking costs, continue to be significant issues for customers, visitors and staff. The closure of the park and rides during lockdown have caused particular issues for staff parking. Good quality, efficient, reasonably priced transport access to service the city centre needs to be addressed in the long term, particularly as footfall is starting to pick up with the return of better weather. This will help contribute towards the Local Plan sustainability goals which includes net zero carbon.

The need for flexibility in future planning policy

Cambridge cannot stand still based on its past retail success. There is a need to address the current structural changes in retail, respond to the pandemic and embrace future trends.

Planning policy must proactively plan for the future. The emerging Local Plan provides an opportunity to embed policy that reflects the reality of the changing retail market now and in the future. In order to address future retail environments, the key to future policy is flexibility to ensure the Council is proactive rather than reactive. Planning policy should reflect national changes and recognise Cambridge City Centre needs to become a mixed-use location.

The question the Local Plan will need to address is how it can provide flexibility for further innovation and change over the lifetime of the plan alongside proposed national changes to planning policy.

The city centre should be a curated space, proactively planned. This can only be achieved by the use of real time data to help drive decision making both currently and in the future. A Retail Study that is based on the old approach will no longer be fit for purpose in a dynamic shopping environment.

Cambridge Retail Study and the use of data to support high streets and town centres

It is noted that Cambridge’s Retail Study is in the process of being updated, with the bulk of the research and data collection being undertaken prior to the pandemic. The information is therefore already out of date and it is short sighted to assume it will bounce back to these levels.

The information contained within retail studies, while a useful starting point, is just that. It cannot solely be relied upon to capture the needs of our high streets. In particular, given the timing of the Cambridge Retail Study and the scheduled Local Plan Examination, winter 2023, the Local Plan needs to be informed by more up to date evidence. We understand that there is no plan to update the emerging Retail Study at present ahead of the Local Plan Examination. This is considered to be a missed opportunity to reflect on retail changes and the subsequent impact (e.g. the pandemic, increase in online shopping/home deliveries and increase in online only retail brands).

One such route to ensure an update to date evidence base is the use of new data sources to quantify future high street needs, identify future uses, create a successful urban environment and ensure partnerships and engagement1.

Due to technological innovation there is an abundance of new datasets which can be used to view a realtime position on the health of the high street and help anticipate future demand. This includes geospatial and demographic information. These datasets combined with the knowledge held by Greater Cambridge Shared Planning Service and local stakeholders could offer a better understanding of Cambridge to inform planning policy decision making in real time.

Cambridge has an opportunity to use data proactively to create a more complete picture of consumer behaviour. This has never been more important given the impact of the pandemic. It provides an opportunity to complement the Retail Study to ensure that policy and decision making is up to date. There is a need to work together to share data sources to help secure Cambridge's future and recognise and respond to the knowledge that each high street is unique with different challenges and opportunities.

Current planning policy

Policy 10: The City Centre

Adopted Local Plan Policy 10 remains relevant in light of recent and proposed changes to the planning system. The emerging Greater Cambridge Local Plan must ensure that Cambridge City Centre is the primary focus for developments attracting a large number of people and for meeting retail, leisure, culture and other needs such as office and residential as a multi-functional regional centre.

The Primary Shopping Area must remain at the forefront of meeting needs within Cambridge.

Policy 11: Development in the City Centre Primary Shopping Area

Adopted Local Plan Policy 11 sets out the acceptable uses within the Primary Shopping Area, the provisions for a change of use and the percentage of A1 shopping frontage.

This Policy is out of date following the revisions to the Use Classes Order (UCO) brought into force in September 2020. The provision of Use Class E is the most significant change to the UCO. Use Class E amalgamates retail, food and drink, financial institutions and office uses within Class E thus providing additional flexibility for landlords and tenants. A change of use within the same use class, in this case Class E, does not constitute development and is outside the control of the planning system.

The aim behind this change was to increase flexibility, diversity and enable greater adaptability to better reflect changing town centres.

It is considered that any future policy within the Greater Cambridge Local Plan must acknowledge the amendments to the UCO and the rationale behind it. It would be counter-intuitive and detrimental to the future of Cambridge if additional restrictions were to be placed on the primary shopping area, restricting change of use beyond the Use Classes Order.

Furthermore, in light of the recent news regarding the Grafton Centre sale, the retail core should be reviewed to assess whether it should exclude the Grafton Centre if it is to become repurposed. The traditional approach to primary and secondary shopping areas should also be reviewed to determine whether it is still relevant.

A new approach to this policy will be required that would support an evolving city centre, enabling flexibility of uses in the long term. If Cambridge does not embrace the city centre as a mixed-use location and meet changing trends within planning policy and planning decision making, occupiers will look to other centres.

In summary, the key for both ASI and USS is:

- flexibility to react to and embrace change;
- the ability to provide a mix of uses to attract visitors to the town centre beyond retail such as food, leisure, entertainment, office, hotels, residential etc;
- the use of data to monitor, inform and embrace changes in retail;
- recognition that Cambridge’s retail environment is changing with long lasting implications on the shopping centres and their future plans; and,
- the need for a reactive and flexible planning environment.

Grand Arcade Shopping Centre

[On behalf of Universities Superannuation Scheme Ltd (“USS”),] In light of the above, we turn our attention to Grand Arcade responding to the questions posed by GCSP.

How is Grand Arcade performing compared to pre-pandemic?

Grand Arcade has inevitably been impacted by the pandemic. The number of vacancies has notably increased from 2% in January 2020 to 13% in January 2021.

This has been amplified by subdued occupier interest over the last twelve months. It was noted that when enquiries were received by Grand Arcade's letting agents, they were from local mid/ market occupiers.

However, interest is starting to increase, including from multiples / international retailers, although this is still tentative. The increase in vacancies and the decrease in interest and new tenant signings exemplifies the impact of the changing retail market combined with the impact of national lockdowns resulting in store closures.

The Agent reports that the retailers who have performed the best in lockdown are discounters, convenience and home improvement retailers. Bricks and mortar fashion retailers have been significantly disrupted by the further growth in online shopping and the pandemic.

It is thought that subdued occupier interest is reflective of low footfall. Footfall is still c.40% behind 2019 levels. However, shoppers have a higher sales conversion rate (30%) compared to pre-pandemic rates (10%). This implies shoppers have made a specific trip to spend rather than just browse.

Many of the retailers within Grand Arcade have, as a result of the pandemic, been subject to CVAs including (Café Nero and All Saints) or have gone into administration including Topshop, Laura Ashley, TM Lewin, Carluccios, Victoria's Secret and Daniel Wellington. It is expected that further CVAs are likely this summer.

The consensus amongst Agents is that the pandemic has accelerated the changes in the retail market, by approximately ten years. There is a requirement for fewer stores, downward pressures on rent, shorter leases, increased capital expenditure needed from landlords to attract the best retailers and retail destinations becoming more multi-purpose (increasing polarisation between prime retail locations and the rest). In summary, Grand Arcade has been negatively affected by the pandemic.

How shopping centres may need to change to take into account Covid-19, changing consumer working habits and changes to the planning system?

A fundamental change to shopping centres will be to move towards a wider variety of uses and services. Shopping centres will not be able to rely on their traditional function of being anchored by fashion occupiers, particularly with the decline of the department store.

It is recognised there is not a one size fits all solution to changing the tenant mix and the income profile of a shopping centre. Each shopping centre must respond to the local market conditions, local stakeholders and requires flexibility to adjust to the changing market conditions. There are lots of recent examples of the re-purposing of department stores: Debenhams at Highcross; University of Gloucester re-purposing Debenhams into a teaching campus; Debenhams, Orchard Street, Leeds – flexible office space and student accommodation; and Queensgate, Peterborough-repurposing of upper floors for a cinema.

Grand Arcade is reviewing their tenant mix and responding to retailer demand (or lack thereof). It is likely there will need to be an increasing mix of non-retail uses within the shopping centre to drive footfall in the long term. It will need to provide entertainment and experiences to be able to compete with online shopping and draw visitors in the city centre. If Grand Arcade does not respond or is restricted in its ability to be flexible to different uses that will provide a differentiator, it will not be able to adapt to the changing retail market.

How do you think the city centre should evolve / adapt including changes to the planning system?

In order to create a successful city centre that caters for both the local population, students and tourists the city centre should adapt to provide a variety of uses. This should include both day and night-time economies by increasing the residential, office and leisure offer. Retail should be focused in the historic core to survive. The surrounding service centres should not compete with the historic core. The city centre can however, only adapt, if it is given the flexibility to respond to the changing environments both now and in the future. The retail environment needs to be regularly monitored and analysed through the collation of up to date data that gives real time information on how the city centre is performing.

Given the speed of change and the longevity of the proposed Local Plan, it needs to be forward thinking and enable change. It should recognise that in the long term the amount of retail may decrease within Cambridge City Centre as the mix of uses increases. This would allow for the right size and amount of retail supported by a strong alternative offer that attracts visitors to the city centre.

Alongside the mix of uses that need to be offered, the transport strategy for Cambridge remains to be of significant importance. There needs to be a strong focus on resolving existing pressures, particularly around car parking and especially in light of the preference for the private car in the current climate.

Grand Arcade's retail agents are noting that retailers are being far more detailed in their analysis of where to take a physical store which includes local parking rates, access for staff and a commercially supportive Local Planning Authorities all have a bearing on where new stores will be located. Cambridge is competing against other major cities in trying to attract the best retail and leisure occupiers. Cambridge's retail position should not be taken for granted, action needs to be taken to protect it and secure its future.

There are a number of changes to the planning system which need to be factored into the future of the city centre and will help support the need for flexibility. This includes the changes to the use classes order. These changes should not be undermined, and it should be recognised what they are trying to achieve. Further changes to the planning system are anticipated in the short term as set out in the Planning White Paper. This further emphasises the need to the city centre to be flexible to respond not only to changing consumer habits and innovation but future planning policy. Planning policies prior to the introduction of Class E are, on the whole out of date and need to be re-envisaged to take into account the new possibilities and implications of the broader use class categories.

Lion Yard Shopping Centre

[On behalf of Barclays Nominees (George Yard) Ltd c/o Aberdeen Standard Investments ('ASI'),] In light of the above, we turn our attention to Lion Yard and the questions posed by GCSP:

How is Lion Yard performing compared to pre-pandemic?

There has been an increasing number of vacancies at Lion Yard. There is also further risk of increased vacancies from mid-sized occupiers (20,000 – 34,000 ft2) which would have a significant impact on the shopping centre. There is a lack of occupiers looking for mid-sized units therefore these units will be difficult to re-let in this current market. In addition, the first floor of Lion Yard has historically been harder to let as a result of lower footfall. This continues to be a challenge given the impact on footfall as a result of the pandemic.

While there are still enquiries, tenants are looking to pay less rent, have rent fixed to a percentage of income and have shorter leases which has implications on the viability of the shopping centre. Rents have already decreased; however, business rates remain high.

The loss of tourist and student spend in Lion Yard has impacted occupiers. The pandemic is therefore impacting on Lion Yard's lettings.

How shopping centres may need to change to take into account Covid-19, changing consumer working habits and changes to the planning system?

Lion Yard has been responding to the changes in retail. It has been evolving over the years to provide everyday convenience retail. This has reduced the reliance on fashion tenants who are particularly struggling at present and who have focused on mid-sized units, of which Lion Yard does not have many suitable units.

ASI has also looked to diversify the mix of uses in Lion Yard. Planning permission has been approved for the change of use from St George House and Lion House for a hotel and the re-provision of the nightclub. This planning consent, including agreeing the S106 took a significantly long period of time. Occupiers are increasingly taking into consideration whether planning consent is required for their units or whether other units would provide an opportunity under the revised Use Classes Order. If planning permission is required, the length of time to obtain permission is a key consideration given delays experienced across the UK, especially if the occupiers are only looking at opening in the key UK retail destinations. Shopping centre owners are therefore being impacted by factors outside of their control and occupiers are drawn to locations where securing permission is more expedient.

The upgrading and change of use of underperforming space is essential if the city centre is to continue to thrive. If there is limited opportunity for flexibility, to be able to change uses in line with consumer demand, the city centre will not adapt to the fundamental shift in the retail market. The city centre needs to provide a wide array of experiences and uses to complement retail to draw people into the City.

Lion Yard will need to continue to adapt both in the short and medium term. It will need to look to other uses to fill the vacancies within the Shopping Centre, particularly at the upper levels which have been historically hard to let. The flexibility to be able to meet the needs of the community and curate the shopping centre experience is essential to ensure its longevity.

How do you think the city centre should evolve / adapt including changes to the planning system?

The recent changes to the planning system in the form of the Use Classes Order and additional permitted development rights demonstrate the Government's recognition of the need for additional flexibility in the planning system.

This flexibility should be demonstrated at a local level to take a long-term view. Planning policy also needs to embrace flexibility to address future changes to the planning system as set out within the Planning White Paper (2020).

Traditional high street names have been lost and new high streets are emerging, there is an opportunity for more uses and new brands to enter the market to bring vibrancy and activity throughout the day and evening, creating an experience. They can only do so, however, with support from the community, planning department and the Local Authority. If there is no support, these operators will look elsewhere, there needs to a) recognition and b) a will for things to change.

The requirements of the local community as well as wider visitors to Cambridge, including tourists and business users, need to be built into any future plan. The necessary and accelerated trend of working from home has resulted in more people shopping local and using facilities, whether that is retail or spaces within city centres. Their vision for the future of the city centre needs to be taken into account being the ultimate users of the space.

In summary, the key to ensuring the success of Cambridge City Centre is flexibility. This is a necessity to monitor (through real time data), address and embrace change.

Appendix 3: Greater Cambridge's Visitor Economy

1. A summary of the Cambridge and South Cambridgeshire Economic Impact of Tourism reports, 2018.

Economic Impact of Tourism reports are prepared by Destination Research using figures derived using the Cambridge Economic Impact Model. These reports examine the volume and value of tourism and the impact of that expenditure on a local economy

The model utilises information from national tourism surveys and regionally based data held by Destination Research. It distributes regional activity as measured in those surveys to local areas using 'driver' such as the accommodation stock and occupancy which influence the distribution of tourism activity at local level.

The Economic Impact of Tourism reports for Cambridge and South Cambridgeshire for 2018 are summarised below.

Overall economic contribution of the tourism sector

The Volume and Value report estimates that the total value of tourism to the Cambridge Economy in 2018 was just under £850 million. This created an estimated 16,617 jobs in the City. For South Cambridgeshire, the value of tourism was just over £190 million creating an estimated 3,776 jobs.

The jobs estimates in the Cambridge model are made up of:

- Direct: those jobs that directly result from visitor spending;
- Indirect: those that indirectly arise from the purchase of supplies and services by the businesses in receipt of visitor expenditure; and
- Induced: the income induced effects arising from the spending of wages by employees in the first round of business and in subsequent expenditure in supplier businesses.

A breakdown of jobs in each category for each area can be found below.

	Number of jobs Cambridge	Percentage Cambridge	Number of jobs South Cambs	Percentage South Cambs
Direct	11,617	70%	3,120	83%
Indirect	3,600	22%	561	15%
Induced	1,400	8%	94	2%
Total	16,617		3,775	

Using the total tourism figures, the Cambridge Model estimates that employment in the tourism sector in Cambridge was 22% of total employment. If only direct jobs are used, it is just over 15%. For South Cambridgeshire the equivalent figures are just over 4% and just under 4%.

Employment in the tourism sector in Cambridge is therefore 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. For South Cambridgeshire tourism employment is not as significant.

Types of trip

In 2018 just under 89% of the trips made to Cambridge were day trips with just over 11% overnight stays. In South Cambridgeshire just over 92% of the trips were day trips and just under 8% were overnight stays.

During 2018 there were 7,348,000 day trips to Cambridge worth £271,795,000. This equates to a value of is. For South Cambridgeshire, 2,997,000 day trips to the district were worth £93,731,210. This equates to just over £31 per day trip.

During 2018 there were also 920,200 overnight trips to Cambridge with 3,858,000 nights spent by visitors with a total value of £337,097,000. This is just over £366 per trip and just over £87 per night. There were 246,700 overnight trips to South Cambridgeshire with 922,000 nights in total spent by visitors in the district. The value of these trips was £51,521,000 which equates to almost £209 per trip and just under £56 per night.

For comparison, the average spend per night in the East of England in 2018 was £55.97 and the spend per trip was £179.51.

Length of stay

Overall the average length of stay in South Cambridgeshire was 3.74 nights. In Cambridge it was 4.19 nights. Britain as a whole had an average trip length of 3 nights.

Tourism accommodation

There is a real contrast between where those who come to visit Greater Cambridge stay. In Cambridge 63% of trips are in serviced accommodation whereas in South Cambridgeshire it is 29%. Serviced accommodation includes hotels, guesthouses, inns, B&B and serviced farmhouse accommodation. The percentage staying with friends and relatives is reversed with 54% in South Cambridgeshire and 21% in Cambridge.

As to be expected in a rural area, there is a greater percentage of camping in South Cambridgeshire. The other significant category for the district is ‘Other - nights spent in transit, in lorry cabs and other temporary accommodation’. This is likely to be a result of the key road routes running through the district and potentially the accommodation for workers on the A14 roadworks.

Given the level of student accommodation in the city, the higher percentage of group/campus trips in Cambridge is not surprising. The greater percentage of trips to second homes compared to South Cambridgeshire is however less predictable.

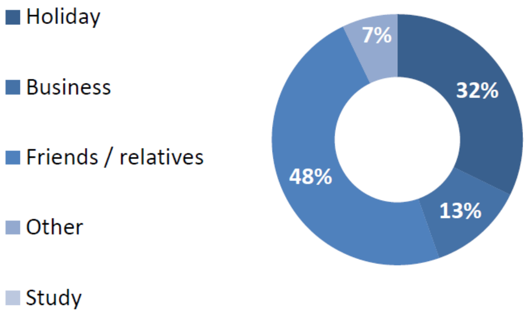
	Trips South Cambs	Nights South Cambs	Trips Cambridge	Nights Cambridge
Serviced	29%	18%	63%	45%
Self-catering	1%	1%	1%	1%
Camping	6%	7%	1%	1%
Static caravans	0%	0%	0%	0%
Group/campus	0%	0%	7%	23%
Paying guest*	0%	0%	0%	1%
Second homes	0%	0%	3%	4%
Boat moorings	0%	0%	0%	0%
Other**	10%	16%	3%	5%
Other friends & relatives	54%	58%	21%	20%

*Paying guest refers to visitors staying in private houses, primarily language school students.
**Other trips include nights spent in transit, in lorry cabs and other temporary accommodation.

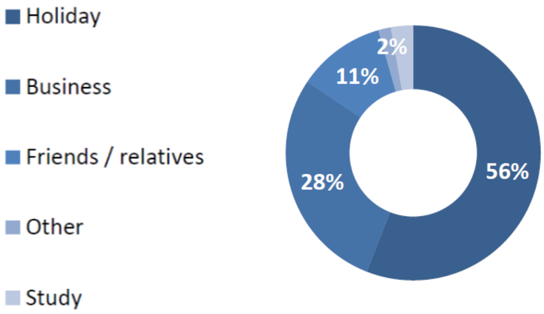
Purpose of trips

There is a contrast between the two areas in the purpose of trips. For Cambridge 56% of trips are for holidays compared to 32% in South Cambridgeshire. Business trips account for 28% of trips in Cambridge compared to 13% in South Cambridgeshire. People coming to South Cambridgeshire are primarily coming to visit friends and relatives.

South Cambridgeshire



Cambridge



Study visits account for 6% of trips in Cambridge and these visitors all come from overseas.

Breakdown of expenditure

The table below shows the percentage of expenditure associated with trips to the two areas. It can be seen that more is spent on accommodation and shopping in Cambridge and on food and drink, attractions and travel in South Cambridgeshire.

	Accomm.	Shopping	Food and Drink	Attractions	Travel
Cambridge	19%	32%	28%	11%	10%
South Cambridgeshire	9%	22%	38%	15%	16%

Origin of visitors

Just over 49% of overnight trips to Cambridge are made by overseas visitors. For South Cambridgeshire this figure is just under 29%. Overseas visitors tend to spend more that UK visitors. For Cambridge the figures are £563 (overseas) vs £176 (UK). For South Cambridgeshire they are £379 (overseas) and £176 (UK).

2. Greater Cambridge Visitor Accommodation Analysis

This paper considers recent trends in visitor accommodation alongside potential new developments.

3. The Cambridge Hotel Futures Study 2012

Cambridge City Council commissioned Hotel Solutions, a hotel development consultancy, to identify the scale and nature of new hotel development required to meet the City's future business and leisure tourism needs from 2011 to 2031. The resulting report, Cambridge Hotel Futures, was published in April 2012 and was used to inform tourism related policy in the Cambridge Local Plan adopted in 2018.

The Cambridge Hotel Futures study produced a baseline estimate of hotel bedrooms for 2012. The study looked at four areas: city centre; edge of city centre; city outskirts; and, beyond the city. The latter broadly equates to the South Cambridgeshire boundary. However, some hotels actually within South Cambridgeshire were allocated to the 'city outskirts' category. (These included hotels in Orchard Park, Histon, Stow-Cum-Quy and Bar Hill as well as sites more closely aligned with the city such as Cambridge Science Park and Cambridge North station) The baseline estimate also breaks down hotel bedrooms by type and quality of hotel.

From this, a projection at five year intervals up to 2031, showed the projected market potential for new hotel bedrooms in Cambridge up to 2031. (The projection focused on city centre, edge of city centre and city outskirts locations) The projections include three growth scenarios, are broken down by type of accommodation and broad location. They are replicated in the table below.

Projected market potential for new hotel bedrooms in Cambridge, 2011-2031[1]

Standard of hotel/ Location/ Year	Projected new rooms[2]	-	-
-	Low growth	Medium growth	High growth
City centre 4*/ boutique	-	-	-
2016	146	181	207
2021	199	275	338
2026	256	385	496
2031	318	512	687
City centre 3*	-	-	-
2016	10	20	30
2021	33	55	79
2026	64	96	138
2031	88	144	209
3*/4* - city outskirts	-	-	-
2016	119	140	157
2021	152	200	240
2026	188	269	339
2031	228	349	458
Budget	-	-	-
2016	177	203	224
2021	218	277	326
2026	263	362	448
2031	312	460	594
Serviced apartments	-	-	-
2016	11	15	18
2021	18	25	33
2026	27	39	52
2031	33	48	65
Total new hotel rooms	-	-	-
2016	463	559	636
2021	620	832	1016
2026	798	1151	1473
2031	979	1513	2013

Source: Cambridge Hotel Futures (April 2012)

[1] Data covers city centre, edge of city centre and city outskirts so does include some parts of South Cambridgeshire that considered to trade in the Cambridge hotel market

[2] Figures are cumulative

The projections culminated in the identification of a number of opportunities for hotel development in Cambridge over the 2011-2031 period. These included:

- 3-4 further boutique hotels in the city centre including one at 5* level
- A luxury 4*/5* hotel in the city centre
- A 3* hotel in the city centre post 2026 (though opportunities could increase if the existing stock is diminished by the current stock re-positioning itself further up-market)
- 3*/4* hotels on the outskirts of Cambridge related to corporate and conference demand such as the Cambridge Science Park, Addenbrookes and West Cambridge
- Budget hotel in the city centre/ station area despite saturation on the city outskirts
- Growth in serviced apartments through both the letting of further residential apartments on a serviced basis and a new purpose-built serviced apartment block of 30-40 apartments
- A 4* aparthotel (75-80 apartments)

The extent to which these opportunities have been realised is considered more fully in the next section. However, in general terms growth to date has been in the 4* sector and focused on edge of city centre locations. There were some small-scale losses in the lower graded sectors (due to both re-positioning and closures).

Cambridge still lacks a 5* hotel and the corporate and conference related hotel developments on the city outskirts (Cambridge Science Park, Cambridge Biomedical Campus and Cambridge West) have been slower to materialise.

However, looking forward over the next ten years, further growth in the 4* sector is expected to be complemented by growth in the budget and aparthotel sectors and, geographically, growth should be more evenly dispersed.

4. Hotel stock

It has been possible to build up a detailed picture of recent and future trends in the number of hotel bedrooms by analysing planning application data from Cambridgeshire County Council Research and Monitoring systems and reviewing hotel websites. The results are presented in the tables below.

Hotel stock (bedrooms) in Cambridge and environs by location[2][3]

Location	Bedrooms 2012	Bedrooms 2020	Change 2012-20	Bedrooms 2031	Change 2020-31
City centre	949	1067	118	1679	612
Edge of city centre	293	637	344	1236	599
City outskirts	853	879	26	1196	317
Remainder of South Cambridgeshire	420	419	-1	769	350
Total	2515	3002	487	4880	1878

Source: Cambridge Hotel Futures (April 2012), Cambridgeshire County Council Research & Monitoring and a review of hotel websites

The key criteria for determining which 'pipeline' schemes to include in the projected increase in bedrooms from 2020-2031 was planning status. Hotel development proposals with full or reserved matters permission have been included and those with outline permission only or with less or no formal planning status have been excluded.

Over the period 2012-2020 there was an increase of over 400 hotel bedrooms in Greater Cambridge. The majority of the growth was around the edge of Cambridge city centre. This was due to the development of the Claydon (4*), originally known as the Tamberlaine, and IBIS (3*) hotels close to Cambridge station. Growth in the city centre was focused on extensions to existing hotels (University Arms Hotel, Gonville Hotel and Cambridge Hotel (subsequently the Doubletree by Hilton Cambridge City Centre) – soon to re-open as the Graduate Cambridge). Further afield the largest development was a 67 bedroom extension to the Holiday Inn Express Cambridge at Coldham's Business Park. It should be noted that the outskirts of Cambridge saw a significant growth in budget hotels (Premier Inn and Travelodge) prior to the 2012 base date.

The area identified as 'Beyond the City' in the Cambridge Hotel Futures report has been renamed 'Remainder of South Cambridgeshire' for the purposes of this report. Cambridge Hotel Futures was commissioned to inform planning policy in Cambridge city and paid relatively little attention to parts of South Cambridgeshire where it considered the hotels 'trade only marginally in the Cambridge hotels market'. However, they clearly take on more significance when considering planning policy across Greater Cambridge.

In terms of the type of hotel accommodation, the strongest net growth over the 2012-2020 period was 4* hotels. This was achieved by new hotel development, extensions and the upgrading of 3* hotels (Gonville Hotel, Quy Mill Hotel and Holiday Inn

[2] The data for 2012 does not exactly match the Cambridge Hotel Futures baseline as one hotel has been re-classified in terms of geography to improve consistency in the data..
[3] A cut off point of accommodation offering about 20+ rooms has been used in assessing change.

Cambridge (Histon)). Overall, the small gain of 3* rooms was due to some smaller hotels previously not graded joining this cohort being partially offset by the loss of accommodation transferring to the 4* sector.

Hotel stock (bedrooms) in Cambridge and environs by type of accommodation[4]

Type	Bedrooms 2012	Bedrooms 2020	Change 2012-20	Bedrooms 2031	Change 2020-31
4*	695	1268	573	1815	547
Boutique	141	137	-4	194	57
3*	742	806	64	1061	255
2*	39	22	-17	22	0
Non-graded	97	0	-97	0	0
Budget	665	640	-25	1046	406
Serviced apartments	136	129	-7	175	46
Aparthotels	0	0	0	567	567
	2515	3002	487	4880	1878

Source: Cambridge Hotel Futures (April 2012), Cambridgeshire County Council Research & Monitoring and a review of hotel websites

The resulting loss of accommodation at the lower end of the market was compounded by some closures. Cityroomz, close to Cambridge station, was lost to wider regeneration plans and Hamilton Lodge and Lovell Lodge have both been demolished. The former will be replaced by serviced apartments (increasing the total letting stock of rooms) and the latter will be replaced by a residential scheme.

The pipeline of future hotel bedrooms, based on planning applications and Local Plan allocations, suggests that the next ten years could see significantly faster growth than the previous ten years. However, it should be noted that not all planning permissions or allocations will necessarily result in development activity. The 2031 estimates set out in the tables above include only those with full or reserved matters planning permission. The schemes included in the 2031 estimates are set out in the table below. In total, these developments could increase the number of rooms by over 1,800. Two hotels, The Fellows House and Novotel, have already been competed in 2021.

[4] Up to date data on some serviced apartments is not available. Where no information is available the 2012 data has been held constant. However, anecdotal evidence suggests there has been considerable growth which means the overall results include an under-count of this sector.

New hotel developments considered likely to proceed during the period 2020-2031

Hotel	Type	LAD	Location	Projected activity	Net gain
Hobson House	Boutique	CCC	City centre	New hotel	57
Lion Yard	Budget	CCC	City centre	New hotel	125
Premier Inn, Grafton Centre	Budget	CCC	City centre	New hotel	153
Park St car park	Aparthotel	CCC	City centre	New Aparthotel	129
Adagio, CB1	Aparthotel	CCC	City centre	New Aparthotel	125
Hyatt Centric (Eddington)	4*	CCC	Edge	New hotel	150
easyHotel	Budget	CCC	Edge	New hotel	90
Hamilton Lodge	Serviced apartments	CCC	Edge	New serviced apartments	46
The Fellows House	Aparthotel	CCC	Edge	New Aparthotel (completed)	133
Turing Locke (Eddington)	Aparthotel	CCC	Edge	New Aparthotel	180
Novotel (North East Cambridge)	4*	CCC	Outskirts	New hotel (Completed)	217
Village hotel, Cambridge Science Park	4*	SCDC	Outskirts	New hotel	100 (estimate)
Hampton by Hilton Duxford	3*	SCDC	Remainder of South Cambridgeshire	New hotel	168[5]
Holiday Inn Express Cambourne	Budget	SCDC	Remainder of South Cambridgeshire	New hotel	144
Ramada by Wyndham Cambridge	Budget	SCDC	Remainder of South Cambridgeshire	Extension	38

Source: Cambridgeshire County Council Research & Monitoring

Most of the growth will be accounted for by three sectors: 4*, aparthotels and budget hotels. The growth is concentrated in city centre and edge of city centre locations although some growth is expected in all four sub-areas. The pipeline only includes one hotel extension. This is likely to be an under-estimate, but it is harder to identify these in the longer term as they have a shorter gestation period.

[5] Planning committee resolved to grant permission, 9 June 2021

The pipeline does not include serviced apartments. A review of the internet suggests there has been considerable growth in this sector and would benefit from further investigation. A recent market report suggests there are five operators with 192 apartments in 2019/20.[6] This represents an increase of about 50% on the 2012 baseline.

There are also a large number of other hotel schemes where there is less certainty concerning when or whether they will be developed. These are included in the table below. Some of these schemes do have outline planning permission and it is possible that they could be delivered by 2031.

New hotel developments with some uncertainty concerning their plans

Hotel	Type	LAD	Location	Projected activity	Net gain
The Forum, Cambridge Biomedical Campus	4*	CCC	Outskirts	Outline permission for new hotel but plans uncertain	198
Vertex Living, former NIAB site	Aparthotel	CCC	Outskirts	Dependent on planning permission being granted. Planning application expected 2021	201
Shire Hall	Aparthotel	CCC	Edge	Potential redevelopment for hotel and office use. Dependent on planning permission	255
Welcome Trust, Hinxton	Unknown	SCDC	Beyond	Outline permission for new hotel	Unknown
Waterbeach	Unknown	SCDC	Beyond	Outline permission for new hotel	Unknown
Bourn Airfield	Unknown	SCDC	Beyond	Outline permission for new hotel	90
Northstowe	Unknown	SCDC	Beyond	Hotel included in masterplan	Unknown

Source: Cambridgeshire County Council Research & Monitoring

[6] 'Statements of Needs Assessments for an Aparthotel project at CB1, Cambridge – Update December 2020', Bridgit Baker Consulting Ltd for Brookgate Property Ltd

5. The small scale end of the market

The preceding analysis has focused on larger scale accommodation, typically hotels. The Cambridge Hotel Futures did not explicitly state a size threshold but seems to have focused on accommodation of about 20+ bedrooms although some smaller accommodation was included. In identifying which new accommodation should be added to the assessment of stock a threshold of 20+ bedrooms has been applied.

However, there is clearly a large amount of small scale accommodation available in the area including small hotels, pubs with accommodation, guests houses/ Bed & Breakfast (B&B) establishments, camp sites and holiday chalets. In aggregate it is likely to form an important part of the visitor accommodation sector. Further investigation of this sub-sector may be useful.

This analysis draws on planning permission data to identify broad trends. Monitoring records from 2011-2020 have been reviewed (although this includes some planning permissions granted but not implemented before this period). About 30 planning permissions were identified which have resulted in changes to the visitor accommodation stock. Those increasing stock outweighed those reducing stock by about 3:2. However, it should be noted that information on the number of rooms was not always available, so it has not been possible to quantify the scale of change.

The most common source of new stock has been the conversion of residential properties to B&B accommodation - ten examples were identified. There have also been small scale extensions to hotels and accommodation blocks added to pubs. The most common source of losses has been the conversion of B&B accommodation to Homes in Multiple Occupation (HMOs) – five examples were identified. There was also one example each of a B&B being converted to residential use and a hotel being converted to both residential and HMO use. A couple of B&Bs were also converted to student accommodation.

6. Planning policy impacts

The current Cambridge and South Cambridgeshire local plans were adopted in Autumn 2018. Therefore, there has been relatively little time to monitor the impact of their respective hotel policies. However, the evidence though limited, suggests that they are having a positive impact on the visitor accommodation stock. A review of planning decisions made between September 2018 and November 2020 identified about 75 decisions related to visitor accommodation. Many were for minor issues or discharging of conditions. The majority of applications were approved and included a number of significant hotel developments including proposals at North West Cambridge, Cambridge Science Park and Waterbeach alongside several city centre schemes.

Where a change of use was allowed from hotel use in Cambridge the new use was usually residential related in line with the Local Plan. Refusals have been scarce but have included a change of use from a hotel to an HMO and from a residential property to a guest house. The most significant refusal concerned the redevelopment of the Station Area along Devonshire Road (‘The Devonshire Quarter’) in Cambridge with a mixed use proposal including a 125 room aparthotel. The application was refused on cycling and design grounds and not on the principle of including an aparthotel. A revised application, including a 141 room aparthotel, was validated on 26 January 2021 and is currently awaiting a decision.

Appendix 4: Short term lettings in Greater Cambridge

1. Introduction

This paper seeks to describe the current position on short term lettings in Greater Cambridge. It explores the level and nature of these lettings, it goes on to consider potential impacts as numbers grow and then finally in explores the tools currently available to local authorities in dealing with short term lettings and what can be learnt from successful enforcement action.

2. What is a short term let?

As described in later sections, there are many variations in the users, types and providers of lettings. A useful definition of short term lets that captures this variation is provided by the Scottish Government who are consulting on a new licensing scheme for short term lets. They define short term lets, in their Draft Licensing Order And Policy Note, as follows:

"…"a short-term let" means the use of residential accommodation provided by a host in the course of business to a guest where all of the following criteria are met

(a) the guest does not occupy the accommodation as the guest's only or principal home

(b) the agreement is entered into for commercial consideration

(c) the guest is not— (i) an immediate family member of the host, (ii) sharing the accommodation with the host for the principal purpose of facilitating the provision of work or services by the guest to the host or other members of the host's household, (iii) sharing the accommodation with the host for the principal purpose of advancing the guest's education, as part of an arrangement made or approved by a school, college, or further or higher educational institution, or (iv) an owner or part-owner of the accommodation.

(d) the accommodation is not provided for the principal purpose of facilitating the provision of work or services by the guest to the host or to another member of the host's household,

(e) the accommodation is not excluded accommodation (see schedule 1), and

(f) the agreement does not constitute an excluded tenancy (see schedule 1)

(g) "short-term let agreement" means the agreement entered into for a short-term let,

The definition includes:

- Lets for work and leisure purposes.
- Lets where the accommodation provided is a bed in a bedroom shared with other guests or a sofa bed in a living room. (I.e. it does not need to be exclusive use of a whole room.)

Excluded accommodation includes, for example, aparthotels, hotels, hostels, refuges, student accommodation, mobile accommodation, accommodation provided by an employer etc.

The legislation does not set a time limit on a short term let. "This is to avoid a loophole whereby lets longer than 28 days (for example in respect of a worker on a 3 month contract to work away from their principal home."

3. Background

Short-term lettings existed before the growth of the sharing economy and online lettings platforms such as Airbnb and Vrbo. However, these sites have transformed the short-term lettings market facilitating millions of homeowners to let out rooms in their homes or entire properties for small available periods as and when desired.

There has been further growth in the extent of the use of these premises more recently with websites such as Booking.com including short term lets alongside hotel and B&B listings.

4. Short term lettings statistics in Greater Cambridge

Number of lettings

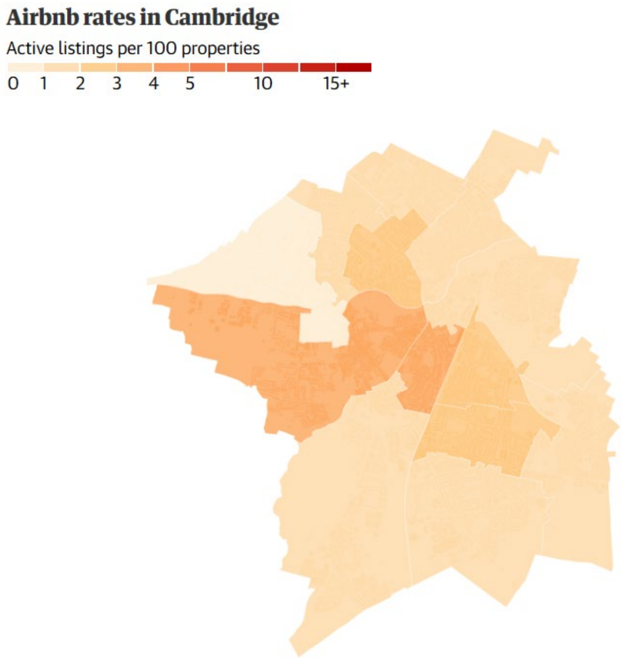
A Guardian article in February 2020 that used data from Inside Airbnb (a non-commercial project that aims to highlight the impact of the service on residential housing markets) estimated that there were 1,181 active (a listing was considered active if the host had updated its availability calendar in the last six months) Airbnb listings in Cambridge and 436 active listings in South Cambridgeshire in the six months to January 2020. This compares to Oxford, 1,473 and York, 1,479.

In June 2021, AirDNA recorded 889 Airbnb and Vrbo active (listings viewable on Airbnb with at least one prior booked night) rentals in Cambridge and 367 in South Cambridgeshire.

The location of properties

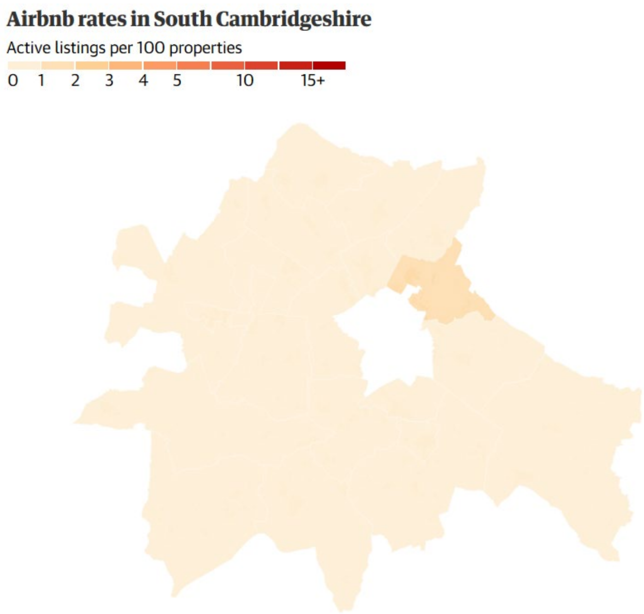
The Guardian article broke the Airbnb figures for February 2020 down into smaller geographical areas, mapping the number of Airbnb lets per 100 properties (using government housing stock figures).

In Cambridge, the wards with the highest numbers were Newnham, Market and Petersfield with approximately 4-5 active lettings per 100 properties. Next were West Chesterton, Romsey and Coleridge with 3-4 active properties per 100 properties. The lowest was Castle with 0-1.



Source: Guardian (February 2020)

In South Cambridgeshire with all parishes except Milton, Horningsea, Fen Ditton and Stow-cum-Quy had 0-1 listings per 100 properties. These four areas had 1-2 listings per 100 properties.



Source: Guardian (February 2020)

The Guardian reported that in England, the areas with the highest rate of Airbnb lets were Woolacombe, Georgeham and Croyde, in Devon, with 23 listings for every 100 properties. In Scotland it was Edinburgh Old Town, where there were 29 active listings for every 100 properties. Across the whole of Great Britain, the newspaper found that there were 0.8 Airbnb listings for every 100 homes.

Letting characteristics

AirDNA reported that 54% and 61% of Airbnb and Vrbo lettings in Cambridge and South Cambridgeshire respectively are whole house lettings. In terms of the number of guests the lettings could host, the average number of guests in Cambridge was 4.1 and in South Cambridgeshire 3.7.

AirDNA also provide figures on the length of stay which shows that a significant proportion of lettings are available for rent for periods of over three months.

	Available for rent in Cambridge	Available for rent in South Cambs	Actual length of time rented out in Cambridge	Actual length of time rented out in South Cambs
0-90 days	52%	45%	75%	66%
91 to 180 days	27%	23%	20%	23%
180 to 270 days	17%	22%	4%	10%
271 to 365 days	4%	11%	-	1%

Information on the methodology used can be found on Inside Airbnb and AirDNA's websites.

The short term letting market in Greater Cambridge includes a range of accommodation and users:

- Holiday visitors staying for short lengths of time.
- Local residents letting out all or parts of their properties.
- Short term accommodation for visiting professionals on a weekly, fortnightly and longer basis.
- Accommodation rented by large local companies for new and visiting staff members.
- Commercial providers letting multiple properties attracted by the higher yield compared to traditional residential lettings.

A market has developed more recently whereby multiple dwelling units are let to expanding companies on the growth areas of the Cambridge fringes to house transient workers, with companies set up to manage such premises. It would appear from planning enforcement investigations to date, that Cambridge has hundreds of premises available for short term lets of this nature. This mirrors findings in London, where it was found that over 40% of Airbnb listings are 'multiple' in that one party is advertising several properties for short term let at any one time.

The impact of Covid-19

The medium to longer term impacts of the Covid pandemic on the short-term lettings market are yet to be seen. As would be expected, there were significant drops in activity when holiday accommodation was required to close (except for the homeless and key workers). There are some indications that the market is recovering globally and it is expected that the UK has seen a significant increase in activity since May 2021 when visitor accommodation was able to reopen.

There may be a shift in demand towards self-contained holiday accommodation and away from communal locations such as hotels and guest houses resulting from a perception that it is easier to control cleanliness and social distancing better in such types of accommodation.

5. The impacts of short-term lettings

There are several positive benefits to short term lettings.

- They provide alternative, often cheaper, accommodation for visitors to an area.
- In increasing the range of accommodation available in an area they can help to increase the number of tourist visitors and therefore spending in the local economy.
- They provide an additional source of income for local residents.
- They can spread the benefits of tourism to other parts of an area that do not traditionally have hotels or Bed and Breakfast accommodation.
- They provide dedicated accommodation to enable workers to stay nearby their workplaces, for example, such as Astra Zeneca, ARM and Addenbrookes.

However, short term lets can also create significant problems for local residents and, where they develop in large numbers, for the local housing market.

A concentration of short-term lets within a residential area has the potential to impact negatively on local neighbours. Noise and disturbance from regular changeovers of visitors, visits by cleaners, and laundry vans, potential anti-social behaviour from visitors enjoying their holiday time and the insecurity created by not knowing your neighbours, particular in flats with shared entrances. With a regular turnover of occupants replacing permanent residents, community cohesion is undermined.

There are significant pressures in the Greater Cambridge housing market with those on low and medium incomes being squeezed out due to the high prices created by demand outstripping supply (Greater Cambridge Housing Strategy, 2019-2023). The permanent conversion of residential properties to visitor accommodation, constitutes a loss of housing. This is contrary to Policy 3: Spatial strategy for the location of residential development in the Cambridge Local Plan which only permits this loss in exception circumstances. The unauthorised loss of housing puts further pressure on the local private housing market. This is a key issue that the Greater Cambridge Local Plan will be seeking to address. As they reduce the number of available dwellings, losses of housing accommodation to short term visitor accommodation exacerbates this imbalance.

6. The management of short-term lettings

In the absence of a short-term lettings registration scheme, Local Planning Authorities have a key role to play in dealing with the issues creating by a concentration of short-term lettings in an area.

The Government's 2014 Review of Property Conditions in the Private Rented Sector describes the powers of LPA's to manage short terms lettings in their area:

"In England, the planning system groups common uses of land and buildings into specific classes. Planning legislation specifies that the change of use of land or buildings requires planning permission if it constitutes a material change of use."

In the short-term letting sector this means that a person may be able to rent their residential property without requiring planning permission provided that it does not amount to a material change in use i.e. provided that a house is primarily used as a home first and short-term letting accommodation second. Local planning authorities consider each case individually, taking into account, for example, the amount of a property which is used as a short-term let, frequency of use and whether the property owners live in the property whilst it is used as a short term let."

Short-term lettings providers may seek planning permission for a change of use from residential to visitor accommodation. However, where permission has not been granted or where it has not been sought, but it is considered that there has been a material change has taken place, the LPA authority can take enforcement action.

The appeal case outlined below from 17 Richmond Road in Cambridge, where an appeal against enforcement action taken by the Local Planning Authority was dismissed, provides a useful insight into the decision-making process. It also highlights the extended length of time required for such planning enforcement investigations; the quantity and quality of work required to bring the investigation to a successful conclusion and the importance of the collaboration of all parties who collected information concerning the use at the property and responded to the Inspectorate during the appeal process. The appeal decision was one of the first of its type in the country outside of London.

Enforcement against short-term lettings in Greater Cambridge

The existing planning enforcement resources, as at August 2021, are balancing a caseload of 60 short term lettings cases in Cambridge alongside other priority enforcement work across the area. There are currently 15 enforcement notices served pending appeals and compliance. These cases have been generated through complaints received generally from local residents.

The consideration of proportionality and expediency when taking action required by planning enforcement legislation means that it takes significant time to investigate and conclude cases. Enforcement action includes an investigation and the service of a formal enforcement notice with its appeal rights. This results in the process taking up over a year for an investigation to run its course and reach the end of the compliance period.

Inner London boroughs such as Westminster and Camden have set up dedicated enforcement teams to deal with short term lets in attempting to enforce the London 90 day rule. However, the teams have expressed difficulties in collecting the evidence to prove such breaches.

17 Richmond Road, Cambridge - Planning Enforcement Notice appeal decision summary and takeaway points

17 Richmond Road (Appeal Ref: APP/Q0505/C/18/3193261) agreed was initially referred to the Planning Enforcement Team by local residents concerned with noise disturbances resulting from increased comings and goings from the property. Late night arrivals of persons to the property and early morning departures were identified as the main reason for noise disturbance. It was alleged that the comings and goings were as a result of the whole of the premises being available for rent on the Airbnb website on a nightly basis. A log was submitted by complainants with witnessed comings and goings from the premises. The log alleged at least 72 lets over a year.

An enforcement notice was issued in December 2017 alleging a change of use from residential use to short-term visitor accommodation. An appeal against the notice was lodged by the property owner and the appeal decision was issued in October 2018.

The Planning Inspectorate agreed with the Council that there had been a material change of use from a single family dwelling house to a (Sui Generis – class of its own) short term visitor accommodation, on a fact and degree basis. The appellant's own submission of the occupation log recording 60 separate stays during a 12 month period pointed to a markedly transient pattern of occupancy, and not something normally associated with a dwelling house, or even a house in multiple occupation. The transient nature of the use was also borne out by the recorded duration of stays.

The Inspectorate also dismissed the appeal on the grounds that planning permission should be given for the unauthorised use. It was considered that in this instance there were two main issues. Firstly, whether there would be adverse consequences for the city's stock of housing. And secondly, whether the living conditions of the occupiers of the nearby dwellings would be adversely affected. These are covered within Policies 3 (…planning permission to change housing or land in housing use to other uses will only be supported in exceptional circumstances) and 35 (Development will be permitted where it is demonstrated that … it will not lead to significant adverse effects and impacts, including cumulative effects and construction phase impacts wherever applicable, on health and quality of life/amenity from noise and vibration) of the Cambridge Local Plan 2018.

A common argument made by landlords is that such uses contribute positively to the visitor economy and this outweighs the loss of permanent housing stock. The Inspector found that Policy 77 of the Cambridge Local Plan 2018 concerns the development and expansion of visitor accommodation and the supporting text focus primarily on the city centre, and that any benefit insofar as the visitor economy is concerned does not amount to an exceptional circumstance sufficient to justify the use in question.

The Inspectors comments also expanded on the themes on social sustainability put forward by both local residents and council enforcement officers:

"While other aspects of the city's economy may well benefit from fresh influxes of short-term visitors, it seems to me that that the non–participation… (of visitors in community activities) …described is likely to extend to other community institutions such as libraries, schools and the like. The consequences attributable to one property in this respect would probably not amount to much. But, were this to be repeated elsewhere, far from helping to create a sustainable community, the cohesion of the local community could well be eroded. This, in turn, could well make the area a less pleasant place in which to live and would be at odds with the social objective to support strong vibrant and healthy communities contained in the Framework (NPPF). Nor would it be consistent with the promotion of social interaction advocated in The Framework…"

The Inspector also agreed with the council that near neighbours living conditions were adversely affected, especially in this instance where the property lies within an established residential area, characterised by a fairly tight-knit pattern of housing.

"As a result, activity associated with the use of the appeal property, such as comings and goings by guests, is likely to be apparent to, and to affect, the occupiers of the nearby dwellings... the pattern of comings and goings by visitors, who may wish to take full advantage of the attractions the city has to offer, in the evenings as well as the daytime, could well be very different from the lifestyles pursued by the more settled populace…"

"In my view, good neighbourliness is an important yardstick for assessing a use such as this. Even though there is no evidence of a statutory nuisance, activity associated with people entering or leaving the accommodation, even if this amounted to no more than good natured conversation, together with vehicles stopping and starting, and the closing of car doors, could well be disturbing to the neighbours whose living conditions would be adversely affected to a significant degree."

The Inspector in particular commented that even if there was one complainant, such an existence strongly suggests that the Councils concerns are well founded. The appearance of just one complainant citing noise disturbance amongst a dense residential area should not indicate a small nature of disturbance, but rather point to the fact that it is occurring in the first place. This has implications for resourcing customer focused planning enforcement cases, whereby all allegations are legally obliged to be investigated to their conclusion.

The role of other Councils services

Other legislation used by Cambridge City Council and local authorities in their statutory duties within Housing and Licensing carry powers and provisions that may be employed to help tackle negative effects of short term lets. However, they do not have the powers to control the number of short terms lets.

In Cambridge, the Environmental Health Team run an Out of Hours noise complaints service for noise complaints made between the hours of 7pm and 7am.

Housing departments have powers to regulate letting agents and property management companies under The Redress Schemes for Letting Agency Work and Property Management Work (Requirement to Belong to a scheme etc) (England) Order 2014.

Planning Enforcement Officers, Licensing Officers, Building Control Officers, Cambridge City Council Housing Officers and officers from the Cambridgeshire Fire Service have met to discuss how the respective regulations can best be applied to investigating properties being used for short term visitor accommodation use. Officers are looking to form a framework to undertake future partnership working on this and other unauthorised uses and potential resulting emerging consequences.

Future legislation

Recent legislation being introduced in Scotland to tackle short term lets combines both Licensing and Permitted Development changes. The Licensing regime would be able to regulate the safety aspects of the standard of the accommodation but would not tackle the planning aspects. Conversely, planning legislation such as permitted development rights, Article 4 directions and local plan policies can manage the amount and location of such uses. It is recognised that any future legislation introduced should be fit for purpose.

In June 2021 the Government published its Tourism Recovery Plan. This included the commitment to launch a consultation on the introduction of a Tourist Accommodation Registration Scheme in England. It aims to create an improved national picture of the precise shape of the accommodation landscape which could feed into a wider Data Hub.

Any such scheme could cover 'traditional' accommodation such as hotels and B&Bs and short term lets. The Recovery Plan states that this could be used to underpin future government interventions, for example regarding the regulation of the sharing economy. "The government is committed to hearing the views of all interested parties on the merits and drawbacks of a Registration Scheme, and how any potential scheme could be implemented proportionately to avoid placing a significant regulatory burden on the sector or risking a reduction in supply."

7. Conclusion

The growth and impact of short term lettings are evidenced both by available statistics and by the current caseload of enforcement cases in the Cambridge area. In South Cambridgeshire, the prevalence of short term lettings is not as significant.

Where successful enforcement action has been undertaken in Cambridge to date, there are a number of key learning points:

- Whether there is a material change of use is made on a fact and degree basis. In the case of 17 Richmond Road the significant number of separate stays and the short duration of the stays.
- Determination of whether planning permission should be given for the unauthorised use was based on two main issues:
    - iii. Whether there would be adverse consequences for the city's stock of housing (contrary to Policy 3 in the Cambridge Local Plan 2018) including whether there were exceptional circumstances.
    - iv. Whether the living conditions of the occupiers of the nearby dwellings would be adversely affected (contrary to Policy 35 of the Cambridge Local Plan 2018) including the impact on social cohesion.
- There is not one single Local Plan policy in the Cambridge Local Plan 2018 that deals with short term lettings which makes enforcement more difficult and more protracted. There is potential to draw the Inspectorate's points together to provide clarity in a new focused policy.