



# **Town Centre Use/Retail Planning Response Statement**

**The Beehive Redevelopment,  
Beehive Centre, Cambridge**

Railway Pension Nominees Limited  
August 2024

Document reference: TH/RR/96861

## **Town Centre Use/Retail Planning Response Statement**

### **The Beehive Redevelopment, Beehive Centre, Cambridge**

Date: August 2024

Prepared by: Rachel Robinson, MRTPI  
Principal Planner

Reviewed by: Tristan Hutton, MRTPI  
Partner

#### **Alder King Planning Consultants**

Pembroke House, 15 Pembroke Road, Clifton, Bristol BS8 3BA  
Telephone: 0117 317 1000

## Contents

1.0	Introduction .....	1
2.0	Sequential Approach .....	2
3.0	Retail Impact .....	8
4.0	Conclusions .....	15



## 1.0 Introduction

- 1.1 This Response Statement (RS) has been prepared following receipt of the Council's retail planning consultants, Urban Shape Planning Consultants (US) appraisal (dated 8<sup>th</sup> December 2023) to Alder King Planning Consultants (AK) Town Centre Use/Retail Planning Statement (dated August 2023) (TCRPS). This RS should be read as an Addendum to our previously submitted TCRPS.
- 1.2 This RS summarises US's key comments raised in their appraisal and then responds to those comments accordingly. Firstly, we address matters relating to the sequential approach (section 2) and then retail impact (section 3). Section 4 of this RS then provides our overall conclusions in respect of retail planning considerations.
- 1.3 It should also be noted, since the submission of the original planning application, a number of amendments have been made to the scheme and the maximum level of retail/town centre use floorspace now sought has reduced. This is primarily due to continued engagement on the scheme following the formal submission of the application, including the input of Cambridge City Council officers, that has led to a proposal with a more concentrated local centre and not as spread out/extensive as the original planning application submission. The application proposal now seeks to create a more obvious hub in the heart of the scheme. Figure 1.1 provides an indicative breakdown of the proposed town centre use floorspace.

**Figure 1.1: Indicative Town Centre Use Floorspace Breakdown (sq m gross)**

	Original Submission	Revised	Change
Convenience	1,542	1,016	-526
Comparison	795	656	-139
Restaurant & Café	2,794	2,541	-253
Total	5,131	4,213	-918

## 2.0 Sequential Approach

- 2.1 This section of the RS provides a summary of US's comments relating to the sequential approach in blue with our response to each matter raised in black.

### Site Specific Need

- 2.2 US suggest that there is no site-specific need for the town centre/retail floorspace in this location because there is no existing or emerging policy support for a new Local Centre and the planning application proposed employment floorspace not residential land uses.
- 2.3 As set out in our TCRPS, the town centre use/retail floorspace is to serve both the people employed within the application site as well as existing local residents in the immediate vicinity of the site. The town centre use/retail floorspace will also provide active ground floor uses meeting urban design objectives for the scheme. Without such uses and an attractive viable environment, the Development will have reduced appeal and may not attract the best occupiers. It is therefore clear that the town centre use/retail floorspace is ancillary/integral to the proposed employment floorspace and there is a site specific need for such uses.
- 2.4 Notwithstanding the above, as US acknowledge, we have undertaken a sequential approach assessment in our original TCRPS.

### Catchment

- 2.5 US suggest that the parameters defined for the sequential assessment in the TCRPS are too tightly defined as the 10 minute walking catchment for the application site overlaps with the catchments of a number of other centres. US therefore conclude that the proposed retail and town centre floorspace should be located in the following centres in the first instance:
- Fitzroy/Burleigh Street/Grafton PSA (The Grafton), Cambridge City Centre;
  - Mill Road East District Centre;
  - Mill Road West District Centre;
  - Norfolk Street Neighbourhood Centre; and
  - Fairfax Road Neighbourhood Centre.
- 2.6 Locating the proposed town centre/retail floorspace within these centres, which in most cases are located over 10 minutes walk from the application site, would not serve the same catchment which is primarily reflected by the need to provide town centre use/retail floorspace for the proposed employment floorspace. Notwithstanding, and without prejudice to this, where not already undertaken, this RS reviews the centres highlighted by US.
- 2.7 The TCRPS has already reviewed the following centres: Fitzroy/Burleigh Street/Grafton PSA (The Grafton), Cambridge City Centre; and Norfolk Street Neighbourhood Centre. Therefore, this RS provides a review of potential sites in the following centres: Mill Road East District Centre, Mill Road West District Centre and Fairfax Road Neighbourhood Centre (as set out below in paragraphs 2.15 to 2.39).

## Flexibility

- 2.8 US comment that the sequential site assessment should consider the ability to accommodate the proposed Use Class E(a) and (b) floorspace only (and not the employment floorspace as well).
- 2.9 For the reasons set out earlier in this RS and in our TCRPS, the town centre use/retail floorspace is ancillary/integral to the proposed employment floorspace and the creation of a single, vibrant new neighbourhood. The ground floor uses would not therefore be proposed as a standalone development or proposed at another site. Notwithstanding that 'disaggregation' is not required, as US acknowledge, our TCRPS, excludes the employment floorspace and considers the proposed town centre use/retail floorspace only.
- 2.10 In addition to the above, and noting the new floorspace figures above, this RS adopts a degree of flexibility based on the updated floorspace figures. Therefore, we have widened the potential site size requirements to be between 3,792sq m and 4,634sq m, which represents 10% reduction/increase on the proposal to establish whether other site opportunities are available and suitable to support the applicant's development. We would note that these revised figures do not affect the findings of our TCRPS

## Sites

### *The Grafton, Cambridge City Centre*

- 2.11 [US agree there are currently no available or suitable sites within The Grafton, depending on the outcome of the Grafton Centre planning application for redevelopment.](#)
- 2.12 Whilst we provide no further detailed comment on this centre in this RS given US's agreement to our previous assessment, we would note that in February 2024 (following US's advice, dated December 2023) that there was a resolution to grant planning permission at committee subject to a S106 agreement for repurposing much of the existing retail floorspace within the Grafton Centre for other commercial uses (LPA Ref: 23/02685/FUL). Given the resolution to grant planning permission, this further supports our previous comments that there are no available sites within The Grafton as the centre is being redeveloped for other purposes.

### *Norfolk Street Neighbourhood Centre*

- 2.13 [US agree, subject to confirmation from the Council, that the proposed retail and leisure floorspace could not be accommodated within this centre.](#)
- 2.14 We therefore provide no further comment on this centre in this RS and await confirmation from the Council that the proposed retail and leisure floorspace cannot be accommodated with the Norfolk Street Neighbourhood Centre in accordance with the findings of our TCRPS.

### *Mill Road East & West District Centres*

- 2.15 [US make reference to the Mill Road Opportunity Area and associated sites as identified in Policy 24 of the Cambridge Local Plan 2018 \(LP\).](#)

2.16 We provide below a review of potential sites and/or units within or on the edge of Mill Road East & West District Centres, with specific reference to the Mill Road Opportunity Area.

2.17 The Mill Road Opportunity Area is identified at Figure 3.10 of the LP, as shown at Figure 2.1 below.

**Figure 2.1: Extract from LP – Mill Road Opportunity Area**



2.18 Turning first to the proposal sites, the LP identifies three sites within the Opportunity Area for redevelopment for residential uses, namely:

- 315-349 Mill Road and Brookfields (R21),
- Mill Road Depot (R10) and
- Travis Perkins site on Devonshire Road (R9).

#### Site R21

2.19 The R21 site at 315-349 Mill Road and Brookfields is identified in the LP for 78 dwellings and up to 1 ha of employment floorspace (including healthcare) and 0.6ha for up to 270 student rooms.

2.20 Planning permission was granted (allowed on appeal) on part of site R21 for student housing consisting of 270 rooms and associated works in March 2016 (LPA Ref: 14/1496/FUL / PINS Ref: APP/Q0505/W/15/3035861). This has since been built out (The Cam Foundry) and so is not available for the proposed retail/town centre use floorspace.

2.21 The remainder of site R21 is occupied by Brookfield Hospital. A search of the Council's website suggests that no planning applications have been submitted for redevelopment of this part of the site for residential and or employment (including healthcare) uses. The hospital use is still existing and as such this remaining part of site R21 is not available for the proposed retail/town centre use floorspace. Furthermore, it is



identified in the LP for 78 dwellings and up to 1ha of employment floorspace (including healthcare) and so would not be suitable for the proposed retail/town centre use floorspace.

#### Site R10

- 2.22 The R10 site at Mill Road Depot is identified in the LP for 127 dwellings.
- 2.23 Planning permission was granted in June 2018 for the erection of 182 dwellings and associated works on the majority of the Mill Road Depot site (LPA Ref: 17/2245/FUL). It is understood that this permission has since been implemented. Therefore, this part of site R10 is not available for the proposed retail and town centre use floorspace.
- 2.24 The remaining part of site R10, fronting on to Mill Road, was granted planning permission in August 2019 for the erection of an apartment building (45 affordable dwellings); erection of mixed use building with community centre and ancillary office and meeting rooms on ground floor with 4 affordable dwellings above; change of use of Gate house to mixed use (commercial ground floor (A1/A2/A3/B1/D1) and 1 dwelling on first floor) and associated works (LPA Ref: 19/0175/FUL). The application form for the proposal identifies that the commercial floorspace amounts to just 73sq m. It is understood that this permission has now been built out.
- 2.25 Given the foregoing, site R10 is neither available nor suitable for the proposed retail and town centre use floorspace.

#### Site R9

- 2.26 The R9 Travis Perkins site at Devonshire Road is identified in the LP for 43 dwellings.
- 2.27 Planning permission was granted in May 2023 for the demolition of the existing depot building on site R9 and redevelopment of the site to provide three new buildings comprising Class E(g)(i)/E(g)(ii) floorspace, two new residential buildings comprising 70 residential units, one new building comprising flexible commercial space (Class E) to include a creche, flexible community space (Class F1/F2) and associated landscaping and access (LPA Ref: 22/01982/FUL).
- 2.28 The application submission, in the Planning Statement, identifies circa. 13,800sq m of commercial floorspace spread across three buildings ('blocks'). As set in the description of development, this commercial floorspace primarily relates to Class E(g)(i)/E(g)(ii) i.e. office and research and development uses, as opposed to retail type uses.
- 2.29 Since permission was granted, several applications have been submitted to discharge conditions. It is understood that demolition on site has started with construction expected to begin shortly. It is anticipated that the development will be completed in 2026.
- 2.30 Given the foregoing, that the site benefits from planning permission for other uses, this site is not suitable or available for the proposed retail and town centre uses.

### Summary

- 2.31 Accordingly, it can be concluded that none of the sites identified in the LP for development are suitable and/or available for the proposed retail and town centre use floorspace.
- 2.32 Furthermore, given the built-up nature of the Mill Road Opportunity Area we are not aware of any other sites that would be capable/suitable for accommodating the proposed retail and town centre use floorspace.

### Vacant Units

- 2.33 In addition to the foregoing, having regard to our review of the Mill Road East & West District Centres we note that there were a total of just 12 vacant units in the Mill Road West District Centre and 7 vacant units in Mill Road East District Centre. The majority of these units, given the nature of the district centres, are all small and are primarily less than 100sqm. At the time of our visit, the largest vacant unit was at 103 Mill Road, which comprised a unit of circa. 400sqm. Even at 400sqm, this unit would not be suitable for the proposed retail and town centre use floorspace, which, allowing for flexibility, would require at least 3,792sq m.

### *Fairfax Road Neighbourhood Centre*

- 2.34 [US suggest that the Fairfax Road Neighbourhood Centre should be assessed as part of the sequential approach.](#)
- 2.35 An analysis of adopted development plan policy documents identifies that there are no sites within or on the edge of Fairfax Road Neighbourhood Centre designated to include retail/town centre use development.
- 2.36 A review of Fairfax Road Neighbourhood Centre has been undertaken by AK. At the time of our site visit, the centre comprised four units, occupied by a newsagents, a fancy dress hire shop, a takeaway and an architect's office.
- 2.37 Given the small scale nature of this centre and the surrounding built uses, our review of the centre has not identified any potential redevelopment sites that would need to be considered as part of the sequential analysis.
- 2.38 Furthermore, all four units were occupied at the time of our visit and there were no vacant units within this centre.

**Figure 2.2: Fairfax Road Neighbourhood Centre**



- 2.39 Accordingly, our review of Fairfax Road Neighbourhood Centre identifies that there are no sites or vacant units that would be suitable or available for the proposed retail/town centre use floorspace.

#### **Conclusions Regarding the Sequential Approach**

- 2.40 As set out in our TCRPS, given the supporting nature/role of the proposed retail/restaurant and café use floorspace, in this instance the floorspace is site specific to the application site.
- 2.41 Notwithstanding the above, the foregoing analysis, in addition to that undertaken in our TCRPS, demonstrates that there are no suitable or available sequentially preferable sites or units in the following centres for the proposed retail and town centre use floorspace:
- Fitzroy/Burleigh Street/Grafton PSA (The Grafton), Cambridge City Centre;
  - Mill Road East District Centre;
  - Mill Road West District Centre;
  - Norfolk Street Neighbourhood Centre; and
  - Fairfax Road Neighbourhood Centre.
- 2.42 Overall, based on the available evidence, it is therefore concluded that the proposed development passes the sequential test requirements.

## 3.0 Retail Impact

- 3.1 This section of the RS provides a summary of US's comments relating to retail impact in blue with our response to each matter raised in black.

### **Retail Impact**

- 3.2 US are of the view, despite the significant reduction in retail/town centre use floorspace (circa 17,500sq m gross) and the fact that the town centre/retail floorspace is in part intended to serve the significant number of employees of the proposed development, a quantitative retail impact assessment is required. US reason this on the basis that they consider that there will be a "significant change in the format and nature of retailing between what is existing and what is proposed on the site" and that "the proposed Local Centre will have a very different role to big box retail warehousing, with a very different catchment area".
- 3.3 Notwithstanding the concern about the resilience of the Beehive Centre to sustain a large retail park, it should be noted that the Beehive Centre, performs a dual role, serving both a wider catchment and also providing day to day retailing/services needs for local residents. In particular, the M&S Foodhall, Asda foodstore, B&M, Everlast Fitness Club, and food and drink uses all also provide local facilities. The comparison goods facilities will also, in part, be used by local residents. To not take the existing significant retail/town centre floorspace and turnover into account as a 'weighty' material consideration in assessing retail impact would be wrong. The reduction in retail/town centre floorspace could actually result in a potential positive impact on nearby centres.
- 3.4 We remain of the view that the approach adopted in the TCRPS in relation to assessing retail impact is proportionate and appropriate. We discuss this further in this RS below.
- 3.5 US note that owing to the phasing of the development, with the retail/town centre uses being brought forward in the earlier phases of the development, that the job creation and associated expenditure from employees will not be fully delivered to support the retail/town centre floorspace being delivered.
- 3.6 Whilst the construction of the retail/town centre use floorspace is phased during the earlier part of the development it is anticipated that there will be a natural phasing of the occupation of this floorspace in line with the construction and occupation of the rest of the proposed development.
- 3.7 US state that there is no sensitivity testing in respect of the daily spend per head figure (£6.74 per employee) which could be lower than presented in the assumptions made.
- 3.8 As set out the TCRPS, the average daily spend of employees (£6.74) has been calculated based on the total spend by employees within the application site as set out in the Economic Impact Assessment. The £6.74 figure also accords with, and is at the lower end of, the average daily spend set out in the Economic Impact Assessment which identifies daily spends dependent on the type of worker of between £6 and £14. Furthermore, the £6.74 figure is also in line with the 2005 YouGov survey (now almost 20 years ago) that found that workers in the UK spent on average £6 a day in the local area around their place of work.

3.9 Given the foregoing it can reasonably be assumed that the £6.74 is at the lower end of the likely daily spend of employees and in reality it is likely that employees will spend at least this amount (rather than less) within the application site.

#### **Impact on Investment**

3.10 The TCRPS assesses impact on potential existing, planned and committed in-centre investment in the surrounding defined centres. It identifies that after a review of all the centres, we were not aware of any relevant retail/town centre use in-centre investment that would need to be considered as part of the impact assessment and therefore could be impacted upon by the proposed development. We have reviewed the centres again and have not been able to identify any relevant retail/town centre use investment in these centres that would need to be taken into account in an impact assessment.

3.11 [US state that Mill Road East and West district centres are identified for investment and development in the Local Plan and that the investment should be protected.](#)

3.12 The only identified investment in the two district centres is the Mill Road Opportunity Area and associated sites. As identified in Policy 24, and set out in section 2 of this RS above, the three identified sites for redevelopment are not identified for town centre/retail use development. Moreover, all three of these sites benefit from planning permission, two of which have been constructed with the third due to be implemented shortly. Therefore, the proposed development will not significantly impact these sites.

3.13 We are not aware of any other in-centre investment that would need to be taken into consideration in our impact assessment.

#### **Impact on Centre Vitality and Viability – Quantitative Impact on In-Centre Turnover**

3.14 Given that the level of town centre use floorspace proposed has reduced Updated Table 3.1 below provides revised potential turnover figure. The assessed turnovers for each town centre use category have reduced, with convenience goods seeing the largest decrease (-£2.77m).

**Updated Table 3.1: Potential Turnover of Proposed Development, 2023 (£m)**

	Original Submission	Revised	Change
Convenience	8.10	5.33	-2.77
Comparison	1.78	1.48	-0.30
Restaurant & Café	9.78	8.89	-0.89

*2021 Prices*

- 3.15 Updated Table 3.2 below also provides updated capacity findings. It shows that the % of expenditure generated in the local catchment area needed to support the proposed smaller local centre has significantly reduced. Only 6% of the expenditure within the Local Catchment Area (800m walking catchment) is needed to support the turnover of the proposed convenience floorspace, just 2% of expenditure is required to support the comparison goods turnover, and 25% of expenditure is needed to support the proposed restaurant/café turnover. The % of expenditure is very low. It should be remembered that this doesn't take into account any expenditure from the wider local area beyond the 800m walking catchment which the proposed development is likely to draw expenditure from.

**Updated Table 3.2: Turnover of Proposed Development Compared to Expenditure Generated by Workers and Local Catchment, 2023**

£m	Convenience	Comparison	Restaurant/Cafe
Potential Turnover of Local Centre	5.33	1.48	8.89
Expenditure Generated by Employees	4.25	1.05	5.30
Residual Turnover after Expenditure Generated by Employees	1.08	0.43	3.59
Expenditure generated in Local Catchment Area	19.02	19.95	14.52
% Expenditure generated in Local Catchment Area needed to support Proposed Local Centre	6%	2%	25%

*2021 Prices*

- 3.16 US's main concern appears to primarily relate to the potential impact of the proposed development on Mill Road East and West district centres. This is because US consider the catchment of these district centres and the proposed development is likely to overlap.
- 3.17 We provide comments below on quantitative impact matters.

1. Proposed Convenience Goods Floorspace

- 3.18 As noted earlier in this RS the application site already comprises a M&S Foodhall, Asda foodstore, and B&M store which provide both a main food and top up food shopping role for both the local population and a wider catchment area. The Greater Cambridge Retail and Commercial Leisure Study, 2021 (GCRCLS) (Appendix 1, Table 7) assesses that these stores generate a convenience goods turnover of £38.8m (@2023 in 2018 Prices) (Asda £32.3m, M&S £5.9m, B&M £0.3m). Converting these turnover figures to 2021 Prices equates to a 2023 total convenience goods turnover of £39.9m

- 3.19 The assessed turnover of the proposed convenience goods floorspace after taking into account expenditure generated by employees is just £1.08m (see Updated Table 3.2). This represents just 2.7% of the existing convenience goods turnover of the application site.
- 3.20 The existing convenience stores at the application site are likely to generate significantly more than 2.7% of their turnover from the local catchment area. Convenience goods turnover not diverted from the existing convenience retailers on the application to the proposed local centre will be distributed/spent at other convenience facilities including those in nearby defined centres such as Mill Road East and Mill Road West, Accordingly, in so far as convenience goods impact is concerned, the proposed development will have a positive effect on nearby defined centres as well as on Cambridge Retail Park.
- 3.21 Having regard to the above, in this instance, a convenience goods quantitative retail impact assessment is not considered to be necessary.

## 2. Proposed Comparison Goods Floorspace

- 3.22 Similarly, in regard to comparison goods turnover, given the nature of the existing retail park there is currently a significant amount of comparison goods floorspace within the application. Based on figures provided in the GCRCLS (Appendix 2, Table 7) the comparison goods turnover of the Beehive Centre is £41.7m (@2023 converted to 2021 Prices).
- 3.23 The assessed turnover of the proposed comparison goods floorspace after taking into account expenditure generated by employees is just £0.43m (Updated Table 3.2). This represents just 1.0% of the existing comparison goods turnover of the Beehive Centre.
- 3.24 Whilst it is acknowledged that the Beehive Centre primarily provides comparison goods retail warehouse format retailing, retailers, including Asda and B&M, do sell comparison goods that are also sold in, and overlap with, local centres (for example: toiletries, books/magazines, chemist goods, pet products/accessories, and home goods). It is considered that residents within the local catchment area are likely to spend in excess of £0.43m on such goods sold at the Beehive Centre. As a result, there is unlikely to be any trade draw from other defined centres or if there is any it would be imperceptible.
- 3.25 Notwithstanding the above, even if was unrealistically assumed the £0.43m proposed comparison goods turnover is new turnover and 50% of it is drawn from Mill Road district centres ((£3.9m @2023 in 2021 Prices, Table 7, Appendix 2, GCRCLS) nb the GCRCLS doesn't provide separate turnover figures for the two local centres)), quantitative impact would be just 5.4%, which is low and not at a level which could be considered to be significant adverse.
- 3.26 Accordingly, given the above, a comparison goods quantitative impact assessment is not considered to be proportionate or reasonable in this instance.

### 3. Restaurant/Café

- 3.27 We have reviewed the GCRLCS and note there are no restaurant/café quantitative turnover figures identified for centres/facilities in Cambridge which can be utilised in a quantitative impact assessment. Accordingly, in the absence of such figures our restaurant/café impact assessment comprises a qualitative impact assessment, focussing on Mill Road East and West district centres. We consider this approach to be both reasonable and proportionate and in accordance with the NPPG: Town Centres and Retail.
- 3.28 Notwithstanding the foregoing, it is important to note, that following the reduction in the size of the local centre, the assessed turnover of the proposed restaurant/café floorspace after taking into account expenditure generated by employees is just £3.59m (Updated Table 3.2). Not all of this turnover would be derived from residents within the local catchment area (800m walking distance). A proportion of this turnover would also be derived from residents outside the catchment area (including those shopping at Cambridge Retail Park and visiting the restaurants/cafes as part of a linked/ancillary trip). Furthermore, given that the proposal is intended to provide new modern restaurant/café facilities it is likely to result in additional/new restaurant/café trips which would have not otherwise taken place. Accordingly, the turnover generated by the proposed restaurant/café turnover is low and trade diversion is likely to be distributed across a number of centres. As a result, the quantitative impact on nearby district and local centres is likely to be very low and not at a level that could be considered to be 'significant adverse'.
- 3.29 The existing restaurant/café provision within the application site comprises a Costa and Subway. There is also a café located within the Asda supermarket. The main purpose of these facilities is to serve customers to The Beehive Centre, providing coffee and/or light refreshments whilst on their shopping trip.
- 3.30 Similarly, the application proposal seeks to provide an element of restaurant /café floorspace which will primarily be to serve employees within the application site, alongside providing a dual role serving local residents.
- 3.31 The proposed restaurants/cafes will be located within a modern setting surrounded by the proposed employment floorspace. Whilst the occupiers are not yet known, it is anticipated that they will be national retailers providing food and beverage facilities primarily for employees within the application site, for example purchasing a coffee before work, or getting a bite to eat at lunchtime or after work. It is worth noting that the applicant has been working with Indie Cambridge to ensure that the redevelopment proposals will add to the local offer (and not serve to compete against it), particularly in respect of the Mill Road district centres and their distinct identity and role.
- 3.32 In contrast to this proposed restaurant/café provision, the Mill Road district centres provide a distinctly different offering. As identified in the LP, Mill Road has a 'distinctive and historic character'. The district centres are located within the designated Mill Road Conservation Area and provide a 'diverse range of shops, high quality historic environment and sense of being a distinctive local community' (paragraph 3.95 of the LP).



**Figure 3.1: Mill Road District Centre (West)**



- 3.33 The LP also notes that Mill Road is characterised by its large number of diverse and independent retail traders 'which lend the area a cosmopolitan feel', with a wide range of restaurants, cafes and hot food takeaways. Our assessment of the Mill Road district centres concludes that, combined, they provide over 40 food and beverage units, comprising a range of cafes, restaurants, public houses and takeaways. Indeed, our assessment supports the LP's findings that the centres have a cosmopolitan feel, with a wide range of restaurants provided including Italian, Australian/New Zealand, Indian, North African, Greek, Middle Eastern, Asian and Mexican restaurants.
- 3.34 Given the foregoing, the wide range of independent restaurant and café provision within the Mill Road district centres, which themselves are considered to be vibrant and vital centres within a densely populated area, in a historic conservation area, provides a significantly different offering to that proposed within the application site. As such, the application proposal will result in an extremely limited overlap with the existing provision within Mill Road district centres and, in turn, will have a very limited impact on restaurant and café provision with these district centres

### **Conclusions on Impact**

- 3.35 Given the foregoing, and as set out in our TCRPS, the application proposal seeks to provide retail and town centres uses as part of the wider application proposal including new life science buildings and open space. The proposed high quality Local Centre will provide a modern vibrant centre to cater for both employees within the application site as well as existing residents within the catchment of the application site.
- 3.36 As confirmed in our TCRPS, given that the application proposal involves a reduction of retail floorspace a retail impact assessment is not technically required. Notwithstanding this, the TCRPS provided an assessment of impact, concluding that the proposals are considered to be acceptable in terms of the test set by prevailing policy insofar as retail impact is concerned.

- 3.37 This Retail Response Statement responds to a number of matters raised by US in relation to impact. It provides further evidence to demonstrate that the level of impact on defined centres within and outside the catchment is very low and would not result in a significant adverse impact on in centre investment or centre vitality and viability. The foregoing additional impact analysis further demonstrates that there is no evidence to suggest that nearby centres are vulnerable to impact. In fact, it is likely that the application proposals, owing to the reduction of retail and town centre use floorspace within the application site, could actually result in a potential positive impact on nearby centres.

## 4.0 Conclusions

### Introduction

- 4.1 This Retail Response Statement (RS) has been prepared by Alder King Planning Consultants in connection with an outline planning application at The Beehive Centre, Cambridge. The RS responds to comments made by the Council's retail planning consultant, Urban Shape (US) in respect of our previously submitted Town Centre Use/Retail Planning Statement TCRPS with regard to the sequential approach and retail impact.
- 4.2 The proposed development comprises the redevelopment of the site for a new local centre, open space, employment floorspace and associated works. The revised new local centre seeks to provide up to 4,213sq m of retail and town centre uses floorspace (Class E(a) and E(b)).
- 4.3 Since the submission of the original planning application a number of amendments have been made to the scheme and the maximum level of retail/town centre use floorspace now sought has reduced. This is primarily as a result of the planning officer having requested a more concentrated local centre and not as spread out/extensive as the original planning application submission.

### Sequential Approach to Site Selection

- 4.4 As set out in our TCRPS, the proposed town centre uses form part of a wider masterplan vision for the application site, which in part replaces some of the lost retail floorspace that is currently provided on the site. Moreover, the proposed town centre use floorspace is sought to create a high-quality Local Centre for future employees on the application site as well as for existing local residents in the local catchment area.
- 4.5 Given the site-specific nature of the proposed retail/town centre use floorspace a sequential assessment of sites outside of the application site should not be required. However, and notwithstanding the foregoing, for robustness, a sequential site assessment was undertaken as part of the TCRPS and further assessment has been included in this RS to respond to matters raised by US.
- 4.6 The assessments undertaken in both the TCRPS and this RS demonstrate that there are no suitable or available sequentially preferable sites or units in the following centres for the proposed retail and town centre use floorspace:
- Fitzroy/Burleigh Street/Grafton PSA (The Grafton), Cambridge City Centre;
  - Mill Road East District Centre;
  - Mill Road West District Centre;
  - Norfolk Street Neighbourhood Centre; and
  - Fairfax Road Neighbourhood Centre.
- 4.7 Overall, based on the available evidence, it is therefore concluded that the proposed development passes the sequential test requirements.

### **Retail/Town Centre Uses Impact**

- 4.8 We remain of the view that given that the proposed development involves a reduction of retail floorspace a retail impact assessment is not technically required. Notwithstanding this, a retail impact assessment was undertaken as part of the TCRPS, concluding that the application proposal is acceptable in terms of the test set by prevailing policy insofar as retail impact is concerned.
- 4.9 In addition, this RS confirms that there is no in-centre investment, as far as we are aware, that would need to be taken into consideration in our impact assessment. Furthermore, a convenience and comparison goods quantitative impact assessment is not considered to be necessary, proportionate or reasonable in this instance. The qualitative assessment of restaurant and café floorspace demonstrates that the proposed offer within the Local Centre will provide a distinctly different offer to that currently provided in existing nearby centres, in particular in the vital and viable Mill Road district centres. As such, the application proposal will have a very limited impact on restaurant and café provision with the Mill Road district centres and in turn no significant adverse impacts arise on the district centres.

### **Overall Conclusions**

- 4.10 Overall, in the light of the detailed analysis and evidence contained in both the TCRPS and this RS, it is concluded that the proposals are consistent with the requirements of current planning policy relating to retail/town centre use impact and the sequential approach. Accordingly, the proposals are acceptable from a retail and town centre use planning perspective.



**Alder King Planning Consultants  
Pembroke House, 15 Pembroke Road, Clifton, Bristol BS8 3BA**