Topic Paper: Jobs

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1. Introduction and purpose

- 1.1 This is one of nine topic papers produced to inform the Draft Plan consultation on the Greater Cambridge Local Plan. The topic papers are:
 - Strategy
 - Sites
 - Climate Change
 - Green Infrastructure
 - Wellbeing and Social
 - Great Places
 - Jobs
 - Homes
 - Infrastructure

- 1.2 All of the papers can be found on the Greater Cambridge Shared Planning website.
- 1.3 The topic papers set out how each policy under the relevant Local Plan 'Theme' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each draft policy.
- 1.4 The Topic Papers build on those published as part of the First Proposals Consultation. They provide background on the early development of the policies. These are still available to view in our document library.
- 1.5 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 Policy.
- 1.6 The content and structure for each policy option is:
 - The issue the plan is seeking to respond to
 - How was the issue covered in the First Proposals consultation?
 - Policy Context update
 - Summary of issues arising from First Proposals representations
 - New or updated evidence
 - Additional alternative approaches considered
 - Response to Main Issues Raised in Representations
 - Further work and next steps
- 1.7 The local plan is supported by a wide range of evidence which can be found in our document library. Key supporting documents to the plan include:
 - Statement of Consultation
 - Sustainability Appraisal
 - Habitats Regulations Assessment

Equalities Impact Assessment (EQIA)

2. Jobs chapter

Introduction

- 2.1 As part of the First Conversation consultation in 2019 we set out our approach to ensuring that a flourishing and mixed economy with a wide range of jobs would be at the heart of the new local plan.
- 2.2 The First Proposals consultation in 2021 identified how jobs had influenced the emerging strategy, and proposed a series of development management policies which would support a flourishing and mixed economy with a wide range of jobs.
- 2.3 A number of comments were received on the general approach to the theme. Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

Summary of the main issues raised in general comments on the jobs theme

- 2.1 Some developers, private-sector organisations and councils expressed support for the aims of the policies in this section. A few parish councils argued the statistics forecasting jobs growth need to be reconsidered after Covid-19 and three respondents argued that the figures were too high.
- 2.2 A few landowners argued that the policies do not promote the needs of Cambridge's high technology clusters or life sciences sectors. Some landowners also emphasised the need for the Local Plan to be flexible in its approach to commercial, retail and leisure uses. Contrastingly Histon and Impington Parish Council argued that new jobs should not be limited to high-

tech jobs but cover a range of employment types. The Cambridge and South Cambridgeshire Green Parties argued that the Local Plan must effectively tackle poverty and inequality in Greater Cambridgeshire and that growth in high-tech clusters will not address these problems. Great Shelford Parish Council argued that the policies in the Jobs Chapter needed to place a greater emphasis upon protecting the rural economy. There were a few comments relating to sites, with developers arguing that their site could deliver the aims of the policies.

Response to the main Issues raised in representations

- 2.3 Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.
- 2.4 The Councils' response to these matters includes:
 - The evidence informing the needs identified in the plan has been updated to inform this draft local plan. Further information on this can be found in the strategy topic paper.
 - Updated evidence has also been prepared to examine employment land supply needs, including for specific sectors.
 - Policies have been included which seek to share the benefits of growth and development. Policies in this chapter propose to require an element of large scale proposals to provide affordable employment space. A policy requiring employment and skills plans as part of proposals is included in the wellbeing chapter.
 - Policies are included to support the rural economy.
- 2.5 More detailed commentary relating to the ways in which the policies in this theme have been amended in response to comments provided through previous consultations are set out in the sections below.

Jobs policies

- 2.6 The following proposed policies areas are addressed in this topic paper:
 - J/NE: New employment and development proposals
 - J/RE: Supporting the Rural Economy
 - J/AL: Protecting the best agricultural land
 - J/PB: Protecting Existing Business Space
 - J/AW: Affordable workspaces and creative industries
 - J/EP: Supporting a range of facilities in employment parks
 - J/RC: Retail and Other Complementary Town Centre Uses
 - J/SA: Cambridge City's Primary Shopping Area
 - J/MS: Markets and Street Trading
 - J/VA: Visitor accommodation, attractions and facilities
 - J/FD: Faculty development and specialist / language schools
- 2.7 Policies are no longer proposed for these issues, and the topic paper provides an explanation for this approach.
 - Policy J/RW: Enabling remote working

3. Policy J/NE: New employment and development proposals

Issue the plan is seeking to respond to

3.1 The availability of suitable office and industrial land and premises is key to the success of the Greater Cambridge economy. Windfall sites are an important element of this supply. It is important that any employment development of is located in the right places to support the area's economy. However, at the same time, the right balance must be found between supporting growth and protecting the quality of the built and natural environment.

How the issue was covered in the First Proposals consultation

3.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

Policy J/NE: New employment and development proposals | Greater Cambridge Shared Planning

3.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

Topic cover - Jobs Topic

Policy context update

National Planning Policy Framework (NPPF, December 2024)

- 3.4 There have been a number of changes to the NPPF since 2021. These include the requirements in paragraph 86 that planning policies:
 - a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;

- c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;
- e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.
- 3.5 Paragraph 86 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections); b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

The UK's Modern Industrial Strategy, June 2025

- 3.6 The UK Government's new Modern Industrial Strategy focuses on driving growth in the IS-8, the eight sectors viewed as having the highest potential. and the frontier industries at their leading edge and targeting the places and clusters across the UK that support those sectors, to increase national productivity, strengthen our economic security and resilience, and support our environmental goals and the net zero transition. This is seen as the best way of driving sustainable, resilient, and clean growth that improves living standards across the UK. The IS-8 sectors are:
 - Advanced Manufacturing
 - Clean Energy Industries
 - Creative Industries

- Defence
- Digital and Technologies
- Financial Services
- Life Sciences
- Professional and Business Services
- 3.7 The Strategy includes interventions focused on the growth potential of the Oxford Cambridge Growth Corridor including:
 - Deepening the support for the corridor and its strengths in Digital and Technologies, Life Sciences, Defence, Advanced Manufacturing, and Clean Energy Industries;
 - Taking forward East West Rail enabling the delivery of homes and jobs and growing regional GVA;
 - Ensuring that water companies build new reservoirs in areas around Cambridge (the Fens) and Oxford (Abingdon) so that industrial and residential developments are not held back due to pressures on water availability.
 - Exploring how to strengthen collaboration between the Oxford Cambridge
 Growth Corridor and other parts of the UK with complementary strengths.
 - Addressing the shortage of high-quality research facilities caused by consistently high demand for R&D space funding the Cambridge Growth Company to invest in infrastructure to unlock housing and commercial development, enter into partnerships with the private sector, and work with local partners on infrastructure delivery
- 3.8 The Strategy also identifies that other sectors all have a role to play in creating jobs, anchoring communities, and strengthening the economy. The freight and logistics sector is highlighted. It is seen as making a vital contribution to the UK economy and the competitiveness of the IS-8, ensuring that the right goods are in the right place at the right time. The Strategy highlights the ongoing support provided to the sector and states that a new plan for freight and logistics is due to be delivered later in 2025.

Regional / local

- 3.9 The objectives outlined in the <u>Cambridgeshire and Peterborough Economic</u>

 <u>Growth Strategy June 2022</u> include:
 - Grow the economy while reducing inequality
 - Ensure transition to green, low-carbon economy
 - Good quality jobs in high performing businesses
 - Better quality skills via a world-class skills system
 - Accelerate local placemaking and renewal
 - Accelerate business growth
- 3.10 The associated priorities for Place and Infrastructure identified in the document include:
 - Revitalise town and city centres with better spaces for businesses and people, improved public realm, supporting culture and creativity, and making better green space more accessible.
 - Bringing forward employment land, including in Market Towns, to support new supply chains across our economies and inward investment opportunities, delivering good jobs.
- 3.11 The priorities for business include:
 - Ensure all parts of C&P have an ecosystem which supports high growth businesses across all sectors.
 - Support high-growth priority sectors (Agritech, Al Digital, Life Sciences, Advanced and Green Manufacturing).
 - Protect accessible and good employment in our foundation sectors (Education, Health and Care, Retail, Leisure and Agri-food).
- 3.12 Community Wealth Building Strategy (Cambridge City Council, 2024) seeks to build an inclusive and sustainable local economy by supporting local SMEs to grow and thrive. The Greater Cambridge Local Plan is cited as a means both of using the Council's resources, assets and powers to build community wealth and of helping to build an inclusive and sustainable economy.

- 3.13 One of the priorities of the South Cambridgeshire District Council Corporate

 Plan 2025-2030 is helping businesses to thrive in South Cambridgeshire. It
 states that as a nationally significant area for growth, there is a need to plan for
 the delivery of additional floorspace for employment. The Plan outlines that the
 Council will do this by working with partner organisations and through the
 planning service to make South Cambridgeshire an even more attractive place
 to do business. The development of Joint Local Plan for Greater Cambridge is
 identified as a key area of Council activity. The plan also includes an action to
 work with partners to ensure that proposed development plans safeguard and,
 where possible, enhance the local environment and nature.
- 3.14 One of Cambridge City Council's strategic objectives for 2022-2027 as set out in its <u>Corporate Plan</u> is to Plan for the sustainable development of Cambridge and support the creation of vibrant, integrated and inclusive new communities. Specifically, to develop and implement a new Local Plan for Greater Cambridge that:
 - supports our net zero carbon vision (including by minimising reliance on the private car),
 - enhances biodiversity and green spaces,
 - increases wellbeing and social inclusion,
 - provides for great places (including by safeguarding our unique heritage and landscapes),
 - encourages a wide range of jobs,
 - provides for enough housing to meet our needs, and
 - plans for the right infrastructure in the right places at the right times to serve our growing communities.

Summary of issues arising from First Proposals representations

3.15 This policy attracted a substantial number of detailed representations. Some parish councils, district councils, landowners and developers expressed support for the policy. Reasons included that it would support delivery of a mix of types of employment, ensure developments were appropriate in scale to their location, and could support providing jobs where there are good transport links.

- 3.16 Babraham Research Campus Ltd broadly supported the policy but asked that policy wording is clearly written to confirm that employment development will be supported in policy areas in the countryside. Other respondents sought amendments to policy areas, such as at Granta Park. Gamlingay Parish Council asked that proposals are proportional in scale and retain the character of the rural area so that they correspond with Gamlingay's Neighbourhood Plan.
- 3.17 Some individuals perceived there to be enough employment in the area and thought that facilitating more jobs would create a need for more homes. Contrastingly, other respondents, mainly developers and landowners, perceived the policy to be too restrictive, and that greater flexibility was required. Some argued that the policy should do more to support clusters, and allow more employment development in various locations. Endurance Estates argued that the emerging policies for industrial development would suppress demand. The same respondent argued that the employment land evidence base underestimates the actual need for Class B2 and B8 uses. Similarly, Newlands Developments argued that the Plan needs to account for increasing growth in the research and innovation, logistics and advanced manufacturing sectors especially in the context of the Oxford-Cambridge Arc. Tritax Symmetry stated that the failure to address logistics floorspace will lead to increased vehicle miles as businesses and households are supplied from facilities further away. A few developers, including Lolworth Developments Limited, stated that the Plan does not meet NPPF's requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales.
- 3.18 The Education and Skills Agency asked for the policy to recognise the direct and indirect skills and employment benefits of education facilities. BioMed Realty asked for the policy to support the needs of clusters and proactively recognise opportunities for some densification to make best use of established R&D Parks, and that policies within the emerging local plan should explicitly support employment development. Hallam Land Management Limited argued

that here should also be consideration of data centres. There were a few site-specific comments where developers promoted their land as a suitable place to deliver the policies. There were also objectors such as Trumpington Resident Association who argued that certain sites were not appropriate for development.

3.19 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

- 3.20 The Greater Cambridge Employment and Housing Needs Update 2024-2045 provides an update to the Greater Cambridge Employment and Housing Evidence Update (EHEU) 2023, looking at the revised plan making period of 2024 to 2045. It includes updated forecasts of the need for employment floorspace in Greater Cambridge looking to 2045.
- 3.21 Completion trends indicate a slight drop in floorspace completions compared with the EHEU results for 2020-41 but a substantial potential demand for floorspace of a variety of types, particularly for office and R&D space. Market signals suggest that demand has increased above that previously identified for manufacturing and warehousing space reflecting good demand in recent years. Office demand bounced back from the pandemic although activity appears to have slowed more recently. Stock losses of industrial and warehousing floorspace and suppressed demand remain key to the calculation of future need alongside population growth and changes in shopping patterns. Balancing the evidence of need, there is a need for office space in Greater Cambridge to 2045 of 302,600 square metres, R&D space of 600,000 square metres and industrial and warehousing space of 317,00 sqm. Taking into account supply commitments, there is a substantial surplus of office and R&D supply in Greater Cambridge compared to the forecast need and a shortfall of around 290,000 sqm of industrial and warehousing space.

- 3.22 The <u>Greater Cambridge Warehouse and Industrial Space Needs</u> (March 2025) study found that in recent years there has been a shortage of industrial space across Greater Cambridge to meet market needs. The assessment of demand and supply in the report indicates that a shortage persists. There are a number of different industrial occupiers seeking space across Greater Cambridge. This includes:
 - i. manufacturers who wish to grow or benefit from local labour and skills;
 - ii. general industrial operators servicing the local population and market;
 - iii. distributors to support requirements of households and businesses; and
 - iv. mid-tech operators who need a mixed space typology for R&D prototyping and testing, often associated with university start-ups or those connected with
 - science park businesses.
- 3.23 In terms of distribution premises, there is a greater need in particular for final mile premises that deliver directly to households and businesses, with close proximity to urban destinations reducing journey times. Cambridge based distribution needs are often served from Huntingdonshire and Peterborough in part due to a lack of Cambridge based suitable premises. There is also demand for large scale logistics space serving the Cambridgeshire market and beyond, whose operator locational needs are not necessarily location specific.
- 3.24 This report makes recommendations to increase the level of industrial provision for manufacturing / advanced manufacturing, general industrial, warehousing and distribution and mid-tech premises and looks at locational priorities for each of these.
- 3.25 The Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs September 2024 (Iceni Projects Ltd) found that Greater Cambridge remains one of the most desirable places in the UK and the world for both the ICT and life sciences sectors. Its academic and research institutions, businesses, science parks, labour and networks continue to support innovation, indigenous growth and attract inward investment.

- 3.26 Greater Cambridge's network of science and technology parks each play a particular role in the knowledge ecosystem providing locations of choice for business clusters that benefit from the networks, services and accessibility on offer. Integrated 'places' that provide the technical premises and facilities but also offer amenity, clustering and connectivity are considered to be important.
- 3.27 The study concluded that Greater Cambridge has a pivotal role to play on the national and international scale in life science and tech evolution but will need to enhance its offer to support its existing ecosystem and continue to compete on the national and international scale. Key priorities include:
 - Prioritising 'place based' business destinations for life science and ICT that offer:
 - high quality modern workspaces;
 - preferably form part of a larger cluster / community to enable knowledge exchange;
 - are in attractive settings;
 - o offer a range of amenities including food and beverage; and
 - o are well served by public transport as well as car.
 - Urban and edge of urban locations are advantaged in their connectivity to
 workforce and amenities, whereas rural settings whilst offering attractive
 environments typically have greater connectivity challenges. ICT
 occupiers enjoy park based settings but equally may thrive in 'downtown'
 locations that are less a part of a defined knowledge cluster, their office
 premises requirements tending to be better suited to urban environments
 and more amenity / accessibly node orientated.
 - Recognising that even Greater Cambridge's most successful life science locations such as Cambridge Biomedical Cluster and Cambridge Science Park will need to evolve to provide best-in class occupier place based destinations that can offer the full range of commercial accommodation, facilities and amenities.

Additional alternative approaches considered

3.28 No additional alternative approaches identified

Draft policy and reasons

3.29 The draft policy can be viewed in the Draft Local Plan:

Link to the draft plan policy

- 3.30 The Draft Plan has identified a range of key employment locations to support the Cambridge economy. There is also a range of smaller employment sites scattered all over the city which play a key role in the local economic ecosystem. Proposals for new employment development will be considered on their merits using the range of other policies that will be included in the plan.
- 3.31 Sensitive small-scale employment development can help sustain both urban and 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.
- 3.32 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.
- 3.33 The proposed approach to development frameworks 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.
- 3.34 On the edge of towns and 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.

- 3.35 Recognising that a number of business parks are located in the rural areas of South Cambridgeshire these key employment sites outside the green belt and settlement boundaries were identified in the Local Plan 2018 as 'Established Employment Areas in the Countryside'. It is proposed to continue the designation for the following sites previously identified to support their continued evolution:
 - Cambourne Business Park, Cambourne;
 - Cambridge Research Park, Landbeach;
 - Brookfields Business Estate / Park, Twentypence Road, Cottenham;
 - Land at Hinxton Road, South of Duxford;
 - Eternit site, Meldreth;
 - Site to North of Cambridge Research Park, Landbeach;
 - Daleshead Foods Ltd, Cambridge Road, Linton;
 - Norman Way Industrial Estate, Over;
 - Buckingway Business Park, Swavesey;
 - Convent Drive / Pembroke Avenue site / Cambridge Innovation Park,
 Waterbeach.
- 3.36 The following sites have been removed from the policy as they are addressed in their own individual policies in the Draft Plan:
 - Granta Park, Great Abington (Policy S/SCP/GP); one of the three major southern business parks, the site warrants a specific policy response due to its importance and the level of change taking place within the site.
 - Wellcome Trust Genome Campus, Hinxton (Policy S/GC); major development site subject to significant on-going expansion, it warrants a specific policy.

- 3.37 The following site is removed because it is an allocation in the Draft Plan:
 - Former Spicers site, Sawston (Policy S/RSC/FSS).
- 3.38 The following sites have altered boundaries:
 - Convent Drive / Pembroke Avenue site / Cambridge Innovation Park
 Waterbeach. A key site for small business, the boundary has been corrected.
- 3.39 The following sites have been added to the list of Established Employment Sites in the Countryside:
 - TTP Campus, Melbourn following consent for a major expansion of the site the area outside the Defined Development extents warrants inclusion in the policy to facilitate its future evolution.
- 3.40 The proposed approach to Defined Development extents (policy SS/DE) 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.
- 3.41 A need for additional space for warehousing and distribution (Use Class B8) was identified in the Greater Cambridge Greater Cambridge Employment and Housing Evidence Update (2023) and the Greater Cambridge Industrial and Warehousing Sector Study 2025. Potential sites are proposed to be allocated (see the Strategy section of the Draft Plan).

3.42 Whilst we need to meet the needs for local distribution, as a central location the area, the area is also desirable to large scale national and regional distributors. Given the very high land take of this type of use, the local pressures on land supply for a range of uses including specialist sectors, and that the area includes the Green Belt, it is proposed that the Plan states that it will not support regional and national distribution proposals, continuing the approach included in the adopted South Cambridgeshire Local Plan 2018. In the Greater Cambridge Warehouse and Industrial Space Needs study 2025 identifies that warehousing and distribution national / regional distribution centres (Use Class B8) usually exceed 9,300 sq.m (100,000 sq.ft) and can be much larger (also known as customer fulfilment centres).

Response to main Issues raised in representations

- 3.43 A number of comments raise issues about the overall quantity and type of employment land being supported by the plan. The strategy section of the plan considers these issues and has been informed by update evidence regarding need. The plan has also considered the needs of clusters, considering both quantitative and qualitative aspects of policy. Sites like Babraham Research Park and Granta Park have received specific policy responses in the draft plan responding to their specific circumstances. Since the First Proposals consultation additional evidence has been commissioned regarding the need for industry and warehousing land, and the strategy has responded to that need with proposed allocations.
- 3.44 A site representation was received to the call for sites submissions update in 2025 suggesting alternative uses for the Eternit site in Meldreth, for residential use or alternative industrial uses. The site did not meet the identified strategy approach to residential development. Very limited information was submitted on the suitability for alternative uses as a data or energy centre. It remains proposed as an established employment area.

Further work and next steps

3.45 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.



4. Policy J/RE: Supporting the rural economy

Issue the plan is seeking to respond to

- 4.1 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.
- 4.2 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 and provide a way of supporting the rural economy and making best use of an existing resource.

How the issue was covered in the First Proposals consultation

- 4.3 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

 Policy J/RE: Supporting the Rural Economy
- 4.4 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.
 <u>Topic cover Jobs Topic</u>.

Policy context update

Regional / local context

4.5 One of the priorities of the <u>South Cambridgeshire District Council Corporate</u>

<u>Plan 2025-2030</u> is to help businesses to thrive in South Cambridgeshire. In

order to achieve this it will provide support to help businesses to start up and grow within South Cambridgeshire.

Summary of issues arising from First Proposals representations

- 4.6 The University of Cambridge and several parish councils supported the policy.
- 4.7 The Campaign to Protect Rural England (CPRE) stated that the policy should be strengthened and properly enforced citing issues of security from opening up tracks and bridleways. At the same time, the British Horse Society highlighted the importance of the bridleway network for economic social and well being. KWA Architects argued the scope of the policy should not be limited to reusing and replacing buildings to allow, for example, for the equestrian industry's needs to be taken into account. Bassingbourn-cum-Kneesworth Parish Council wished to ensure that small employment sites should not expand into the countryside. Anaerobic digestion was highlighted as a potential alternative use and the need for a strategic plan identified. Cambridge Past Present and Future stated that if proposals relate to solar or windfarms the policy need to relate back to CC/RE and protection of landscape. Huntingdonshire District Council expressed concern over the deliverability of the policy in the context of the wide range of uses facilitated through the prior approval and notification process.
- 4.8 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence

4.9 N/A

Additional alternative approaches considered

4.10 No additional alternative approaches identified

Draft policy and reasons

- 4.11 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 4.12 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.
- 4.13 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.

Response to main Issues raised in representations

4.14 Paragraph 88 of the NPPF states that planning policies and decisions should enable the development and diversification of agricultural and other land-based rural. The draft policy seeks to strike the right balance between supporting the rural economy, and restricting development where it would not be sustainable. The policy focuses initially on using existing resources such as redundant buildings, but will allow new buildings in appropriate circumstances. In combination with other policies in the plan this is considered an appropriate level of flexibility. Some types of development are now covered by permitted development rules, but it is important that the plan maintains a policy framework for the consideration of proposals when permission is required.

Further work and next steps

4.15 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.



5. Policy J/AL: Protecting the best agricultural land

Issue the plan is seeking to respond to

- 5.1 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.
- 5.2 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.

How the issue was covered in the First Proposals consultation

- 5.3 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

 Policy J/AL: Protecting the best agricultural land | Greater Cambridge Shared Planning
- 5.4 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

 Topic cover Jobs Topic

Policy context update

National context

5.5 The Government's approach to Advanced Manufacturing in the UK Government's new Modern Industrial Strategy (June 2025) includes tapping into the market for Agri-tech solutions to boost productivity, build climate resilience, and reduce emissions in the agriculture sector.

Regional / local context

5.6 The <u>Cambridgeshire and Peterborough Economic Growth Strategy June 2022</u> includes Agri-Tech as a core economic cluster for the area with jobs focused across the south of South Cambridgeshire and to the north of Cambridge.

Summary of issues arising from First Proposals representations

- 5.7 Some parish councils, government and political organisations expressed support for the policy, caveated by Gamlingay Parish Council that it must be above sea level and have suitable drainage. Abbey Properties Cambridgeshire Limited questioned the need for this policy as they perceived it to already be included in national policy. Claremont Planning Consultancy suggested that there will be some instances where the loss of agricultural land will be required to meet development needs. In contrast, a number of respondents argued that the Plan's infrastructure and housing proposals would contravene this policy and the National Planning Policy Framework. It was suggested that this loss should be explicitly quantified in individual site policies. The Campaign to Protect Rural England argued that the policies should be strengthened and properly enforced cited the damage and security issues caused by opening up tracks and bridleways.
- 5.8 There were requests that the policy take account of alternative reversible uses of agricultural land, for example equestrian uses and the land needs of renewable or infrastructure developments, was requested. Cambridge and South Cambridgeshire Green Parties asked for reassurances that this policy would not prevent habitat restoration projects on drained peat soils currently under agricultural use.
- 5.9 There were a few representations relating to specific sites; some argued that the policy would be contravened by the relocation of the Cambridge Waste Water Treatment Plant and the Cambridge Biomedical Campus proposals. Whereas some developers argued that there were clear instances when it

would be necessary to build upon agricultural land and posited specific examples.

5.10 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement (date).

New or updated evidence base

5.11 N/A

Additional alternative approaches considered

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

Draft policy and reasons

5.13 The draft policy can be viewed in the Draft Local Plan:

Link to the draft plan policy

- 5.14 Greater Cambridge has a significant resource of good quality agricultural land. 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 just under 72,000 hectares in 2024 (Defra: Land use, Livestock and Agricultural workforce in England by Local Authority).
- 5.15 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 supply of land for development means there is pressure for development of agricultural land.
- 5.16 Farmland is also an important biodiversity asset for Greater Cambridge. 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. Due to the pressures of increasing land use and the past needs of intensive cultivation, the farmland of the district in places is under severe stress and this resource needs to be protected.

- 5.17 Priority Species and Habitats are those that are identified within list of priority habitats and species in England ('Section 41 habitats and species') and detailed more fully in the list of UK BAP priority habitats.
- 5.18 In the First Proposals it was proposed that the requirement that the impact of development on soils and the protection of soil quality be considered, through careful management during construction was include in the policy. This requirement is now included in Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks, as it was considered to be more appropriate.

Response to main issues raised in representations

- 5.19 The NPPF states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. 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. This policy seeks to clarify how the NPPF will be applied in Greater Cambridge through preventing development which would lead to irreversible loss of Grades 1, 2 and 3a agricultural land unless under specific circumstances.
- 5.20 National Planning policy requires strategic policies to provide for objectively assessed needs for housing and other uses any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. The plan allocations have been through a comprehensive assessment in the HELAA process, and sustainability appraisal, where a wide range of factors, including the grade of agricultural land have been assessed. It is not possible to meet needs only

using brownfield land in this area, and much of the remaining land is agricultural.

5.21 On other issues raised, footways and bridleways are addressed in Policy I/ST: Sustainable Transport and Connectivity. Point 2 allows that temporary uses may be possible with an appropriate condition. The policies caveat under Point 1 for sustainability considerations and the need for the development provide the potential flexibility to address important climate change and infrastructure projects.

Further work and next steps

5.22 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

6. Policy J/PB: Protecting existing business space

Issue the plan is seeking to respond to

- 6.1 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.
- 6.2 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.

How the issue was covered in the First Proposals consultation

6.3 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

Policy J/PB: Protecting existing business space

6.4 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

Topic cover - Jobs Topic.

Policy context update

National context

National Planning Policy Framework (NPPF, December 2024)

- 6.5 There have been a number of changes to the NPPF since 2021. These include the requirements in paragraph 86 that planning policies:
 - a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the

- national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;
- c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;
- e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.
- 6.6 Paragraph 86 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:
 - a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);
 - b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and
 - c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

Local/regional context

- 6.7 The Advanced Manufacturing sector is one of the IS-8 sectors identified in the UK Government's Modern Industrial Strategy. The ambition by 2035 is to have nearly doubled annual business investment in the sector from £21 billion to £39 billion, driving growth across the economy. The Oxford Cambridge Corridor is one of the Advanced Manufacturing Clusters identified for support.
- 6.8 The Strategy also identifies that other sectors all have a role to play in creating jobs, anchoring communities, and strengthening the economy. The freight and

logistics sector is highlighted. It is seen as making a vital contribution to the UK economy and the competitiveness of the IS-8, ensuring that the right goods are in the right place at the right time. The Strategy highlights the ongoing support provided to the sector and states that a new plan for freight and logistics is due to be delivered later in 2025.

- 6.9 The objectives outlined in the <u>Cambridgeshire and Peterborough Economic</u>

 <u>Growth Strategy June 2022</u> include:
 - Grow the economy while reducing inequality
 - Ensure transition to green, low-carbon economy
 - Good quality jobs in high performing businesses
 - Better quality skills via a world-class skills system
 - Accelerate local placemaking and renewal
 - Accelerate business growth
- 6.10 The associated priorities for Business identified in the document include:
 - Ensure all parts of C&P have an ecosystem which supports high growth businesses across all sectors.
 - Support high-growth priority sectors (Agritech, Al Digital, Life Sciences, Advanced and Green Manufacturing).
 - Protect accessible and good employment in our foundation sectors (Education, Health and Care, Retail, Leisure and Agri-food).
- 6.11 The priorities for Place and Infrastructure include:
 - Bringing forward employment land, including in Market Towns, to support new supply chains across our economies and inward investment opportunities, delivering good jobs.

Summary of issues arising from First Proposals representations

6.12 Some individuals, developers, charities, and parish councils expressed support for the policy. Contrastingly, Croydon parish council argued that protecting business spaces should be considered on a case-by-case basis. A few developers, including Abrdn, argued that the policy should recognise the increasing importance of town centres catering for flexible uses, and that office uses are not always required. The same respondents also stated that redeveloping brownfield land and re-providing existing uses alongside co-located

residential uses is a better way to utilise land. DB Group Holdings LTD argued that protection for existing business space needs to extend to ensure that expansion opportunities are supported. The same group asked for measures to be included to ensure that other development that is supported by the Plan does not constrain existing successful business sites. There were also some site-specific comments, where developers and landowners explained how their sites could fulfil the aims of the policy.

6.13 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence

Greater Cambridge Employment and Housing Needs Update 2024-2045

- 6.14 The Greater Cambridge Employment and Housing Needs Update 2024-2045 (EHNU 2045) 2025 provides an update to the Greater Cambridge Employment and Housing Evidence Update (EHEU) 2023, looking at the revised plan making period of 2024 to 2045. The report provides evidence on the housing and employment needs for the Local Plan looking to 2045.
- 6.15 Market signals suggest that demand has increased above that of that identified in the EHEU 2023 for manufacturing and warehousing space reflecting good demand in recent years. Updated completions figures indicate a slight drop in provision of floorspace and substantial potential demand for floorspace of a variety of types, particularly for office and R&D space. Stock losses of industrial and warehousing floorspace remain evident with supply failing to keep pace with demand. A need of around 317,000 square metres of industrial floorspace to 2045 is identified with a shortfall of around 290,000 square metres when supply commitments are taken into account.

Greater Cambridge Warehouse and Industrial Space Needs

6.16 The <u>Greater Cambridge Warehouse and Industrial Space Needs</u> (March 2025) study found that in recent years there has been a shortage of industrial space

across Greater Cambridge to meet market needs. The assessment of demand and supply in the report indicates that a shortage persists. There are a number of different industrial occupiers seeking space across Greater Cambridge. This includes:

- i. manufacturers who wish to grow or benefit from local labour and skills;
- ii. general industrial operators servicing the local population and market;
- iii. distributors to support requirements of households and businesses; and
- iv. mid-tech operators who need a mixed space typology for R&D prototyping and testing, often associated with university start-ups or those connected with science park businesses.

6.17 In the review of evidence on the local industrial market the study reports that:

- LSH report that Cambridge (and surrounds) industrial land market continues to grapple with strong competition from more valuable commercial uses, predominantly science and technology.
- Bidwells report that the limited amount of new development in the
 Cambridge industrial market and loss of industrial space to other uses
 meant that requirements were six times higher than available space at
 end June 2024. The life science and high-tech manufacturing sectors
 continue to be an important driver of industrial demand in Cambridgeshire.

6.18 Reporting on discussions with stakeholders the study highlights:

- A unanimous view that B8 space was lacking within Greater Cambridge leading to the less efficient and sustainable relocation of distribution companies outside Greater Cambridge to find larger premises.
- Demand for properties from trade counter, wholesale, motor repair, construction yards and other local population serving industries require who find it difficult to find space in Cambridge and serve their market.
- Concerns about the displacement of general industrial tenants due to current industrial land being allocated for residential. It was unclear to some where these companies will go once residential development begins. As such, "it feels like industrial is at the bottom of the pile".

- Good demand for production space for both general and higher tech occupier needs, which with a lack of supply invariably sees operators move out to "Huntingdonshire, Ely or other locations".
- 6.19 The study makes recommendations to increase the level of industrial provision for manufacturing / advanced manufacturing, general industrial, warehousing and distribution and mid-tech premises and looks at locational priorities for each of these. It suggests that the Local Plan should consider provision of around 317,000 sq.m of additional industrial and warehousing space, considerably higher than the 200,000 sq.m recommended in the EHEU.

Additional alternative approaches considered

6.20 No additional alternative approaches identified.

Draft policy and reasons

- 6.21 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 6.22 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.

- 6.23 Based on the evidence, including recommendations within the Greater Cambridge Employment Land and Economic Development Evidence Study, specific protection of industrial sites within Cambridge is included in the draft Greater Cambridge Local Plan. This forms 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 sets out the tests that apply to different locations, and how those tests can be met.
- 6.24 The following Strategic Industrial Estates have been retained from the First Proposals document:
 - Barnwell Business Park and Barnwell Drive, Cambridge
 - Beadle Industrial Estate, Ditton Walk, Cambridge
 - Coldham's Lane Business Park, Cambridge
 - King's Hedges Road Kirkwood Road / Kilmaine Estate, Cambridge
 - Mercers Row Industrial Estate (including Swanns Road), Cambridge
 - North of Coldham's Lane, Cambridge (including Church End Industrial Estate and College Business Park)
 - Ronald Rolph Court, Wadloes Road, Cambridge
- 6.25 Six new sites have been added to the Strategic Industrial Estates to be protected since the First Proposals. They are:
 - Brickyard Industrial Estate/Coldham's Road, Cambridge
 - Cheddars Lane, Cambridge
 - Cottage and Cave Industrial Estates, Fen Ditton
 - Henley Road, Cambridge
 - Hain Daniels Site, Histon
 - Winship Road, Norman Industrial Estate, Cambridge Road, Milton
- 6.26 These sites have been selected using the following criteria:
 - a. Location within or on the edge of Cambridge
 - b. Site size
 - c. Substantial portion of the site is used for industrial purposes

- 6.27 In addition to the inclusion of new sites, the following sites have boundaries changed:
 - Mercer's Row: expanded to include two small additional areas on the edge of the Cambridge 2018 site.
 - College Business Park: expanded substantially to include Church End Industrial Estate. Church End Industrial Estate was included as an allocation in the Cambridge Local Plan 2018 but the Draft Plan does not take this forward. The Cherry Tree Apartments housing site is excluded.

Response to main issues raised in representations

6.28 The representations provide a range of opinions, supporting the need for protection of employment land through to the need for flexibility. The draft policy strikes the right balance, protecting this important resource, but not being so onerous as to provide unreasonable levels of long term protection.

Further work and next steps

6.29 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

7. Policy J/AW: Affordable workspace and creative industries

Issue the plan is seeking to respond to

- 7.1 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.
- 7.2 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.
- 7.3 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.

How the issue was covered in the First Proposals consultation

7.4 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

Policy J/AW: Affordable workspace and creative industries

7.5 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

Topic cover - Jobs Topic

Policy context update

National context

7.6 The National Planning Policy Framework (2024) paragraph 85 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.

- 7.7 Paragraph 86 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, and spaces to enable a rapid response to changes in economic circumstances.
- 7.8 Paragraph 87 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.
- 7.9 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.

The UK's Modern Industrial Strategy, June 2025

7.10 Support small and medium-sized businesses with a new Business Growth Service to streamline access to government support, advice, and funding; initiatives to tackle the issue of late payments from large suppliers; and procurement reforms to make it easier to secure government contracts. 7.11 Interventions to progress the priorities include those aimed at improving support for small and medium sized businesses making it easier and quicker for all businesses to operate in the UK.

Regional / local context

- 7.12 Community Wealth Building Strategy (Cambridge City Council, 2024) seeks to build an inclusive and sustainable local economy by supporting local SMEs to grow and thrive and by supporting the growth of social enterprises, community-owned businesses and cooperatives, which are able to invest their income into building local community wealth.
- 7.13 Cambridge City Council <u>Corporate plan 2022-2027</u>: <u>our priorities for Cambridge</u> which aims to ensure a varied cultural offer is available to all those who live, work and study in, and visit, Cambridge from all backgrounds and incomes.
- 7.14 South Cambridgeshire District Council's <u>Business Plan for 2024-2025</u> action plan states we will support businesses to start up and grow within the South Cambridgeshire area.

Summary of issues arising from First Proposals representations

- 7.15 There were less representations in response to this policy compared to other policies in the Jobs Chapter. Some developers, parish councils, charities, and landowners expressed support for this policy. Histon and Impington PC wanted the affordability of the workplaces to be higher and set at 80% rather than 60%.
- 7.16 Contrastingly, Mission Street Ltd questioned the requirements of the policy due to a perceived lack of evidence justifying the level of affordable workspace and the scale of development that should provide it. The same respondent asked for clarity relating to key terms in the policy and asked for the policy to have greater flexibility so that the rate of affordable workspace is proportionate to the scale of the development. Abbey Properties Cambridgeshire Limited argued that it was not acceptable for a commercial development to subsidise

workspace. Cambridge and South Cambridgeshire Green Parties supported the aims of this policy but wanted the rate which is considered 'affordable' to be set through assessment of the ability of the target market to pay the rates. Contrastingly, the Universities Superannuation Scheme recommend that affordable workspace requirements are subject to viability to ensure marginal schemes are not unnecessarily restricted from coming forward. The same respondent also argued that the provision of affordable workspace on-site is not always appropriate and wanted the policy to allow for financial contributions for equivalent off-site provision. A few developers and landowners put forward site specific comments and explained how their sites would deliver the aims of the policy.

7.17 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

- 7.18 The <u>Greater Cambridge Growth Sectors Study</u>: <u>Life science and ICT locational</u>, <u>land and accommodation needs</u> (<u>September 2024</u>) addressed the need for affordable workspace in the life science and ICT sectors. It concludes that provision of affordable accommodation is one of the challenges that Greater Cambridge faces in continuing to evolve its offer to compete on the national and international scale.
- 7.19 Considering locational and accommodation needs in both sectors, for start-up and small businesses the study found that there is an emphasis on the importance of incubators and proximity to institutions in supporting early growth. Institutions with innovation centres can play a pivotal role through the provision of dedicated affordable and flexible space, as well as a wider range of facilities and knowledge / expertise.
- 7.20 In the life science sector, start-up wet labs are typically not viable as a standalone proposition. Start-ups tend to be reliant on funding rounds and university support, therefore the transition into their next stage can be

challenging if there is a lack of affordable lab space. Additionally, shorter term leases are often necessary due to the rapidly changing composition and needs of life science companies over their first five years, contrasting the traditionally long-term and inflexible laboratory leases on offer.

- 7.21 In the ICT sector, the study reports on the findings of the Digital Sector Strategy for Cambridgeshire and Peterborough (2019) which found that the colocation of digital business and provision of affordable space within which start-ups can grow remains critical to the establishment of effective knowledge transfer in Cambridgeshire.
- 7.22 Addressing the provision of additional smaller workspaces directly, the study finds that there are examples in London boroughs where section 106 contributions are sought for affordable workspace, including lab space. It suggests that Greater Cambridge could explore the feasibility in location specific viability terms of such policies. If pursued, the report recommends that commuted sums the best way of delivering start-up accommodation so that development can be delivered and managed in an institutional environment rather than proliferated across multiple sites. The study suggests that further work would be required in considering institutions and funding routes best placed to cater for additional start-up offering.
- 7.23 The <u>Greater Cambridge Warehouse and Industrial Space Needs</u> study published in March 2025 included some discussion of the needs of start-up businesses in the mid-tech and advanced manufacturing sectors. Stakeholder engagement indicated that many start-ups found the shared facilities offered by university departments or science parks (including advisory services such as at St Johns Innovation Centre) very useful during their early developmental stage.
- 7.24 In the advanced manufacturing sector, many start-up companies do not always have a physical product from the outset, however they will require some small-scale manufacturing space. In the mid-tech sector edge of urban locations

provide an optimal location for start-up and scale up space. Having a Cambridge postcode was regarded as a beneficial advantage for attracting and securing venture capital.

Additional alternative approaches considered

7.25 No additional alternative approaches identified

Draft Policy and reasons

- 7.26 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 7.27 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 SMEs to enter.
- 7.28 These spaces play an important early role in ensuring the effective functioning of Greater Cambridge's economic ecosystem. 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.
- 7.29 Affordable workspaces also 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.
- 7.30 The Draft Plan will play a key role in bridging the gap in affordable workspace provision, however it is vital that this provision is viable to the developer

providing it, a feasible proposition to workspace providers and affordable to potential occupiers. These will depend on a number of different factors including:

- Type of use
- Location
- Scale
- Proportion of the development
- Discount offered
- Fit out costs
- 7.31 Prior to finalising an affordable workspace policy, it is important that the councils understand the impact of these variables on viability, feasibility and affordability. This analysis will be developed further prior to the next stage of the plan process.
- 7.32 Whilst evidence from sector studies indicates that there is a need for affordable workspace, further work is also required to understand the detailed nature of the need in individual sectors and to identify future potential opportunities to fill any gaps in provision were in-lieu payments to be received. The draft policy allows for in-lieu payments where the economic benefits of pooling affordable workspace funds are significantly more positive than on-site or off-site provision and the work to identify gaps in provision will be a key element in determining the economic benefits of investment in alternative provision.
- 7.33 The range of spaces in the draft policy reflects the fact that the Greater Cambridge economy consists of wide range of sectors requiring different types of space. For example, life sciences businesses, depending on their specialism, generally require wet and dry labs, ICT and professional services require office and dry labs and advanced manufacturing companies, depending on their lifecycle stage, require a varying mixture of light or general industrial space and R&D, office and warehousing space.

- 7.34 As well as ensuring a sufficient supply of affordable business space for our key sectors, affordable workspaces 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. Creative industries, which play an important role in place making and cultural provision, have a wide range of needs depending on the type of creative businesses occupying the space, for example, artists studios, makerspace, rehearsal and performance space.
- 7.35 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 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.
- 7.36 Given the limited availability of floorspace in Greater Cambridge, particular within Cambridge, it is preferable that affordable workspace is provided on site. There are a number of options on how the workspace will be operated and managed. It is important that whatever form this takes, it is delivered, operated and managed effectively, according to the proposals set out an agreed Workspace Management Plan and achieving the objectives and targets set out in the Plan.

Response to main issues raised in representations

7.37 A need for affordable workspace has been identified. Further work will consider the appropriate levels of discount and these will be tailored to reflect market rates in different areas. The requirements for workspace will be a percentage and therefore will vary according to the scale of the development. An example is provided to aid understanding so that consultees can respond to the direction of travel. The policy recognises that there may be circumstances where off-site

provision or payments in-lieu may be appropriate. Requirements for affordable workspace from commercial developments have operated successfully in other areas such as Hammersmith and Fulham and Lambeth. The policy recognises that there may be circumstances where off-site provision or payments in-lieu may be appropriate.

Further work and next steps

7.38 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

8. Policy J/EP: Supporting a range of facilities in employment parks

Issue the plan is seeking to respond to

- 8.1 The success of many business parks and employment sites in Greater Cambridge is not solely due to their employment buildings but also the mix of services and facilities that support them. Providing facilities such as cafes, restaurants, indoor and outdoor social spaces and leisure facilities, changing facilities and creches, green spaces and collaboration and networking spaces helps create high-quality working environments that attract and retain talent, foster collaboration, and support employee well-being.
- 8.2 Integrating these facilities into employment sites also contributes to sustainable transport patterns by reducing the need for off-site travel during the working day. Helping to manage the peak arrival and departure of workers travelling to and from the site, can contribute to managing peak-time congestion, easing pressure on infrastructure, and improving air quality.
- 8.3 At the same time, it is important that these facilities are appropriately scaled so they enhance employment areas without undermining the role of nearby district and local centres.

How the issue was covered in the First Proposals consultation

8.4 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

Policy J/EP: Supporting a range of facilities in employment parks | Greater Cambridge Shared Planning

8.5 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

Topic cover - Jobs Topic.

Policy context update

8.6 There have been no changes to the national, regional or local policy context from that which informed the First Proposals, and is set out in the Jobs Topic Paper (2021).

Summary of issues arising from First Proposals representations

- 8.7 Issues raised in the representations include:
 - General support for supporting a range of facilities from a number of the organisations that responded to the consultation.
 - Requests for additional types of facilities to be added to the policy. These
 included showering facilities and water refilling stations, flexible business
 space and a range of green spaces.
 - A request for Section 106 contributions to pay for facilities and for investment support for active travel.
- 8.8 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

- 8.9 The <u>Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs (September 2024)</u> identifies locational priorities and land characteristics essential for key sectors that notably drive employment growth in Greater Cambridge.
- 8.10 A key finding highlights the growing demand for integrated locations places that combine high quality technical premises with amenities, clustering opportunities, and strong connectivity. Evidence gathered by the consultants suggests that businesses increasingly prioritise locations offering quality premises alongside amenities such as cafés, restaurants, green spaces, gyms, sustainable transport options, and affordable market housing.

8.11

- 8.12 The study provides an overview of four international case studies that provide best-practice insights relevant to Greater Cambridge:
 - Gateway of Pacific (San Francisco, US)
 - Stanford Research Park (San Francisco, US)
 - 12 Switzerland Innovation Park, Basel Area (Switzerland)
 - Kendall Square (Boston, US)
- 8.13 Despite differences, these locations share common features that contribute to their success including quality amenity land and facilities:
 - Green spaces and landscaping for improving staff wellbeing
 - Opportunities for informal networking between organisations
 - A variety of quality food and drink and leisure offerings, enhancing the overall attractiveness of sites for staff.
- 8.14 The business survey conducted for this report, which gathered responses from 22 life science businesses (both large and small) in Greater Cambridge and the Iceni business survey responses for ICT businesses of all sizes found that access to amenities, particularly cafes and restaurants, was highly desirable among businesses.
- 8.15 The <u>Greater Cambridge Warehouse and Industrial Space Needs</u> study published in March 2025 included consideration of how important amenities are to businesses within industrial sub-sectors. Iceni found that:
 - Amenity space was crucial for mid-tech occupiers. Aspects such as landscaping, cycle pathways and amenities were no longer regarded as niceto-have features for companies wishing to attract/retain a Cambridge graduate workforce. These features were seen as beneficial for receiving potential clients and investors.
 - Distribution and industrial occupiers tend to be less amenity sensitive than other uses, however employee well being is noted to be increasingly

important, particularly in logistics where this has arguably been historically overlooked. Operators and developers have put more emphasis on well being for example 41 42 including amenities such as trim trails, outdoor gyms, picnic space and landscaped areas. On-site / park café facilities are the most sought-after amenity along with adequate employee and customer parking.

Additional alternative approaches considered

8.16 No additional alternative approaches identified

Draft policy and reasons

- 8.17 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 8.18 The success of many campuses and business parks in Greater Cambridge is not solely due to their employment buildings but also the mix of facilities that support them. Providing amenities such as cafés, restaurants, green spaces, and leisure facilities helps create high-quality working environments that attract and retain talent, foster collaboration, and support employee well-being.
- 8.19 Integrating these facilities into employment sites also contributes to sustainable transport patterns by reducing the need for off-site travel during the working day. This helps to manage peak-time congestion, ease pressure on infrastructure, and improve air quality.
- 8.20 At the same time, it is important that these facilities are appropriately scaled so they enhance employment areas without undermining the role of nearby district and local centres.
- 8.21 The evidence suggests that businesses increasingly prioritise locations offering quality premises alongside amenities. As a result, the proposed policy has been strengthened so that new or expanded employment sites and business parks must consider and demonstrate how the needs of workers and visitors will be met and ensure that any new facilities do not have unacceptable impacts on nearby centres.

Response to main issues raised in representations

8.22 Responses largely supported to aim of delivering appropriate facilities. The wording of the policy provides a broad framework that provides flexibility for employment parks to accommodate a tailored range of facilities to support the amenity of workers.

Further work and next steps

8.23 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

9. Policy J/MS: Markets and street trading

Issue the plan is seeking to respond to

- 9.1 Permanent shops face higher operating costs than temporary market stalls, and small retailers or food store operators may be discouraged from establishing a permanent presence if temporary traders are allowed to dominate the retail environment. For this reason, markets must be carefully managed in terms of their size, frequency, and the type of goods they offer, to avoid undermining the profitability and viability of permanent retailers.
- 9.2 This balance is especially important in emerging settlements, where Designated Centres are still taking shape. In such cases, proposals for markets or street trading should undergo additional scrutiny to ensure they support the centre by offering complementary goods and services. This assessment should include a comparison between the goods and services available from market traders and those offered by permanent retailers. If a significant overlap is identified, market or street traders offering duplicate products or services should not be permitted to operate.

How the issue was covered in the First Proposals consultation

9.3 Markets and street trading were not explicitly considered as part of the First Proposals for the Greater Cambridge Local Plan. However, during the drafting process and in response to the findings and recommendations detailed within the Greater Cambridge Retail and Leisure Study (2025), it was considered that the Local Plan would be more effective with a standalone policy that establishes requirements for proposals that could affect existing markets, and requirements for proposals that seek to introduce space for new markets and street trading activities.

Policy context update

National context

- 9.4 The National Planning Policy Framework (NPPF, December 2024) paragraph 85 emphasises that planning policies should create conditions that enable businesses to invest, grow, and adapt. Significant weight should be given to supporting economic growth and productivity, considering both local business needs and broader development opportunities. Policies should build on local strengths, address weaknesses, and prepare for future challenges.
- 9.5 Paragraph 86 highlights the need to remove barriers to investment—such as poor infrastructure, lack of services or housing, or an unattractive environment. Planning should remain flexible to meet unforeseen needs, support evolving working practices, and provide adaptable spaces that can respond quickly to economic change.
- 9.6 Paragraph 90 emphasises that planning policies should positively support town centres, recognising their role in local communities by encouraging their growth, effective management, and adaption.

Regional / local context

- 9.7 The Cambridgeshire and Peterborough Economic Growth Strategy (June 2022) sets out the following key objectives:
 - Drive economic growth while tackling inequality
 - Support the transition to a green, low-carbon economy
 - Create high-quality jobs within successful businesses
 - Improve skills through a world-class education and training system
 - Accelerate placemaking and the regeneration of local areas
 - Boost business growth across the region
- 9.8 Place and Infrastructure priorities identified in the strategy include:
 - Revitalising town and city centres by enhancing spaces for businesses and the community, improving the public realm, supporting cultural and creative industries, and increasing access to quality green spaces

 Unlocking employment land, including in Market Towns, to develop new supply chains, attract inward investment, and deliver well-paid jobs

9.9 Business priorities include:

- Building a strong ecosystem that enables high-growth businesses to thrive across all sectors and areas of Cambridgeshire and Peterborough
- Supporting key high-growth sectors such as Agritech, Artificial Intelligence and Digital, Life Sciences, and Advanced and Green Manufacturing
- Safeguarding accessible, quality employment in essential foundation sectors, including Education, Health and Care, Retail, Leisure, and Agrifood
- 9.10 Cambridge City Council's <u>Community Wealth Building Strategy (March 2024)</u> aims to build a fairer and more sustainable local economy by helping local SMEs grow and by supporting social enterprises, cooperatives, and community-owned businesses that put their profits back into the community.
- 9.11 The Cambridge City Council <u>Corporate plan 2022-2027</u>: <u>our priorities for Cambridge</u> seeks to ensure that people of all backgrounds and incomes whether they live, work, study in, or visit Cambridge can access a wide range of cultural activities.
- 9.12 The South Cambridgeshire District Council <u>Business Plan for 2024-2025</u> supports the growth of new businesses in the district.

Summary of issues arising from First Proposals representations

- 9.13 A standalone policy was not proposed in the First Proposals. However, in response to the proposed policy on Retail and Centres some respondents, especially parish councils, noted the importance of protecting and supporting smaller shops, services, and amenities in villages and elsewhere. Some respondents argued that facilities in new settlement centres should be protected to serve the residents and prevent car journeys.
- 9.14 While there was general support for the Council's strategic vision for Greater Cambridge, with a focus on community building, climate change mitigation and

adaption, and enhancing local character, some respondents expressed concern that the proposed policies would not support the delivery of this vision. For example, on community building, some felt that the narrow focus on centres would result in heartless, community-poor developments.

- 9.15 The need for a more focused, standalone approach on markets emerged from this body of responses, given the potential for markets to positively support community development, alongside the need to put in place sufficient safeguards to ensure that permanent shops are not adversely affected by market traders selling similar goods and services.
- 9.16 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

- 9.17 The Greater Cambridge Retail and Leisure Study (2025) sets out a series of strategic objectives and policy recommendations, including a robust policy for the retention, protection, and enhancement of existing markets. The health checks and town centre analysis demonstrate the continued importance of markets to the overall vitality and viability of town centres, particularly in Cambridge City Centre.
- 9.18 A Greater Cambridge Market Economic Social Impact Assessment (March 2025) is in preparation. The Assessment will measure the holistic economic, social, and cultural value of traditional retail markets across Cambridge and South Cambridgeshire. Once published, its findings may inform the Proposed Submission version of the Local Plan.

Additional alternative approaches considered

9.19 No policy and rely on national policy and guidance and the other policies in the plan. This was not considered a reasonable approach as markets are an important element of retail in Cambridge. While considering the findings and recommendations of the Greater Cambridge Retail and Leisure Study (2025), it was determined that the Local Plan would be more effective with a dedicated policy. This policy would set out requirements for proposals that may impact existing markets, as well as those aiming to introduce new market spaces or street trading activities.

Draft policy and reasons

- 9.20 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 9.21 Policy J/MS seeks to provide a mechanism through which applicants can demonstrate how their proposals support the retail centre by offering complementary goods and services to those offered by permanent retailers. This approach to markets and street trading is intended as an adaptation of Policies 10 and 11 of the Cambridge Local Plan (2018).

Response to main issues raised in representations

- 9.22 The policy takes a balanced approach in response to the general comments raised at the First Proposals consultation. Successful markets can play a crucial role in supporting community development and cohesion, supporting local economic development by providing opportunities for small and micro businesses to trade and enabling different members of the together to interact and connect.
- 9.23 The policy responds positively to those respondents that felt the Local Plan could go further in supporting initiatives that support community building. It provides explicit support for the establishment of new markets and the creation of well-designed places for them to take place, spaces which can be used flexibly for other community uses outside of trading hours.
- 9.24 However, in response to the concerns raised about the lack of safeguards to protect smaller shops, especially in villages, the markets policy puts in place proportionate criteria to ensure that markets complement rather than compete with permanent shops. This will be particularly important in villages, where the

permanent retail offer can be a lifeline for local residents, and in emerging centres where permanent shops are at the early stages of establishing themselves.

Further work and next steps

9.25 The Greater Cambridge Shared Planning Service has commissioned a new Greater Cambridge Retail and Leisure Study, to update the April 2025 version. This will support the ongoing development of the Greater Cambridge plan and will be reviewed in conjunction with the feedback from this consultation to support the finalisation of our policies.



10. Policy J/RC: Retail and other complementary town centre uses

Issue the plan is seeking to respond to

- 10.1 The purpose of the policy is to set a framework which supports the important role and function of district, town centres and local centres in Greater Cambridge, which provide a range of services and facilities for our local communities. The policy aims to set a positive approach to their growth, management and adaptation, supporting environmental enhancements wherever possible and prioritising development that increases vibrancy and maintains the character of different places.
- 10.2 Due to the shift in consumer habits, and pressures placed on the retail sector by the rise of internet shopping, COVID-19 and, more recently, the impact of day to day increases in the cost of living, the policy framework needs to strike an appropriate balance between providing both certainty and flexibility for centres; enabling centres to evolve by allowing for a broader mix of uses that reflect contemporary economic and social needs, while safeguarding their core functions and character.
- 10.3 In both urban and rural contexts, many communities, including those in newly planned settlements or in areas undergoing significant growth, face barriers in accessing essential shops and services within reasonable distances. Without proactive planning interventions, including timely delivery of retail and service provision within planned areas of growth and strong protection for smaller centres and rural shops and services, there is a risk of increasing car dependency and social disconnection.
- 10.4 A robust policy framework will help to reinforce the roles of all tiers of the centres hierarchy, ensuring that they are not only protected from out-of-centre retail that may have a detrimental impact on the vitality of an area, but also are enabled to adapt and thrive as focal points of daily community live.

How the issue was covered in the First Proposals consultation

- 10.5 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy J/RC: Retail and centres. During the drafting process and responding to the findings of the Greater Cambridge Retail and Leisure Study (2025), it was considered that the policy should be split into separate policies to improve clarity of purpose and ensure policies that are digestible and easy for users to understand. The policy was separated into Policy J/RC: Retail and other complementary town centre uses and Policy JS/A: Cambridge City's Primary Shopping Area.
- 10.6 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Topic cover - Jobs Topic.

Policy context update

- 10.7 Chapter 7 of the NPPF sets out the government's planning policies on retail and town centres. This policy context has seen limited change since the First Proposals consultation. However, the most significant recent changes in the national context are the various amendments made to the Use Classes Order in 2020, which included a number of uses under the previous Use Classes Order being revoked and replaced by much broader use classes, notably the E class. In practice, they provide significantly greater flexibility for changes in use across a range of main town centre and other uses without a requirement for planning permission. While these pre-date the last consultation, they have had a significant bearing on the formulation of our proposed policies.
- 10.8 Beyond these amendments, there have been no significant changes to national policy relating to the role and function of retail centres, with the National Planning Policy Framework continuing to support a positive approach to town centres, focusing on their vitality, viability and long-term resilience.

Summary of issues arising from First Proposals representations

- 10.9 Several respondents expressed support for the proposed policy in the First Proposals (J/RC). Bassingbourn-cum-Kneesworth PC argued that the policy needed to have a greater focus on rural shops and services. Abrdn, the Universities Superannuation Scheme and the Education and Skills Funding Agency, supported elements of the policy but objected to potential Article 4 Directions that restrict alternative uses, arguing that alternative uses improve vitality of city centres.
- 10.10 Contrastingly, Cambridge Past, Present and Future argued that shops and services should be protected from change of use through removal of permitted development rights. A few developers, including Abrdn, felt that the policy lacked sufficient flexibility to enable Greater Cambridge's centres to adapt to the contemporary economic climate; in particular, the aspect of the policy which would resist the loss of retail or other town centre uses in existing centres and primary shopping areas. Cambridge and South Cambridgeshire Green Parties argued that encouraging small-scale units in Cambridge may not be sufficient to attract the range of users mentioned in the policy.
- 10.11 Representations made in relation to other Local Plan policies are also relevant considerations for this policy. The Education and Skills Funding Agency (Department for Education) suggested that the Local Plan makes clear that education facilities serving a wider catchment area will not be considered a town centre use requiring sequential approach to be applied, but that any such facilities must be in sustainable, accessible locations (representation made in relation to the proposed approach to Policy WS/CF).
- 10.12 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

10.13 To support the First Proposals consultation, the Councils commissioned a new Greater Cambridge Retail and Leisure Study (completed April 2025) to support the preparation of the new Local Plan. This study ("the 2025 Study") comprises two sections. The first provides an updated baseline report to provide a review of current retail and leisure provision in Greater Cambridge. The household and in-centre surveys completed to inform the previous study (April 2025) were completed in October 2019, before any Covid lockdowns. The second provides an assessment of overall need based upon the planned housing trajectory and population growth forecasts to the period 2045 and beyond.

Updated baseline

10.14 The 2025 study found that Cambridge City Centre continued to be the most dominant comparison-goods shopping destination in Greater Cambridge. While the city centre has retained its appeal and catchment, the popularity of out-of-centre floorspace has declined substantially, with a significant fall in market share from 23.7% in 2013 to 15.7%). In the absence of major competing development since 2013, this out-of-centre market share decline can be attributed almost entirely to the growth in on-line shopping, whereas the city centre has withstood the impacts of national trends and the growth in on-line shopping more robustly.

10.15 Other notable findings include:

- The proportion of units in the historic core dedicated to comparison retailing (43% of total), which remains well above the national average (30%);
- A significant reduction in the level of comparison goods floorspacing, down from 87,677m² net in 2013 to 60,856m² in 2023, much of which can be attributed to the loss of the Debenhams department store in 2021 (and likely to have reduced further through recent closures at the Grafton Centre since the survey was undertaken);
- In line with national trends, the increase in the number of leisure units from 149 (26%) in 2013 to 179 (31%) in 2023;

- Ongoing vacancy rates well below the national average in the historic core, despite a small increase from 8% in 2013 to 9% in 2023.
- 10.16 The University of Cambridge and historic centre are both recognised as helping to attract national and international tourists and students into Cambridge, resulting in high levels of footfall. Visitor survey analysis demonstrated the wide range of reasons and attractions drawing people to the city centre, ensuring a strong baseline position in the context of evolving market trends towards multi-dimensional town and city centres.
- 10.17 Turning to Greater Cambridge's wider network of centres, the April 2025 study found that all district and local centres across the city are performing well aside from Eddington, which is still settling into new trading patterns and should become established with on-going residential development.
- 10.18 Within Cambridge, a key trend has been a net loss of comparison units and a net gain of service and leisure units. This reflects a shift towards town centres providing a more leisure-oriented purpose within city's boundary area.
- 10.19 The survey identified South Cambridgeshire's centres as distinguishable by their higher focus on service and convenience provision relative to the national picture. Their vacancy rates varied ranged from a low of 5% in Histon and Impington, to a high of 25% in Cambourne. Despite this, vacancy levels were below the national level (an average of 8% compared to 12% nationally), reflecting a strong performance.
- 10.20 At the time of the survey, Sawston was the largest rural centre in South Cambridgeshire (in terms of number of retail units) and provided the highest proportion of service units (at 63% of all units). The high levels of vacancy in Cambourne suggested that there was either an oversupply of retail space, or that the centre was not functioning as intended. The Strategy suggested continued monitoring of the town centre's performance and designation of a town centre boundary to focus the location of town centre uses in one area.

Retail need

- 10.21 Drawing on key findings from the baseline and anticipated future growth, the April 2025 study recommended that there was no need to allocate sites outside the existing, emerging and planned network of town centres for comparison or leisure floorspace over the Plan period, but suggested this should be kept under review, particularly beyond the first 5-year period to 2030. However, it was noted that the absence of need should not preclude quality redevelopment coming forward in town centres to enhance, consolidate and replace unwanted vacant space.
- 10.22 On the basis of current market share, forecast growth in population and expenditure, and current levels of performance, there is an identified need to support around 1,500 square metres net of convenience goods floorspace over the plan period. However, given the number of proposed new settlements and other strategic allocations across Greater Cambridge it was judged that there was no need to allocate any out-of-centre sites to meet this need. Analysis demonstrated that several large food stress stores in and around Cambridge are already underperforming, reinforcing the need to focus creation of any new food stores at future growth locations.
- 10.23 With respect of small to medium sized food stores, the 2025 Study recommended support for new units at emerging and planned new town/local centres of an appropriate scale to serve the local community. The 10-minute walkable neighbourhood concept should also inform the distribution of facilities across any given area. Food store proposals across the existing network of town centres should also be supported.
- 10.24 Overall, the study noted that projections beyond 2030 should be treated with caution given the passage of time and an ongoing uncertain economy.

Other recommendations

- 10.25 The study made a range of other recommendations around the overall approach to retail and town centres in the emerging Local Plan. It recommended that:
 - Any identified floorspace need should continue to be directed to the network
 of existing town centres and Strategic Allocations, including proposed or
 emerging new town/local centres, in accordance with the sequential approach
 set out in national planning policy;
 - The plan should define a clear, consolidated hierarchy of centres across the
 plan area to clearly guide applicants around what scale of proposal would be
 acceptable in different locations and to assist in the enforcement of the
 sequential approach, including identifying in the hierarchy any emerging local
 centres at new settlements and strategic allocations that should be
 considered for inclusion into the new hierarchy once development is
 complete;
 - Impact testing should be required against a substantially lower threshold of 300m² across the Plan area compared to the city's existing 2,500m² (in alignment with the baseline position in the NPPF), to ensure the impacts of future medium sized food store proposals on retail centres are rigorously tested;
 - Centres at Hills Road and Cherry Hinton Road (including the centre at Cambridge Leisure) should be reclassified upwards to District Centres, the latter of which was not taken forward because it was considered more appropriate to control Cambridge Leisure's development proposals through a specific site allocation;
 - Reflecting their important function despite their falling market share, policies should incorporate sufficient flexibility to enable the potential intensification of out-of-centre retail sites for non-retail uses, including existing retail parks, subject to other relevant planning considerations policies should identify opportunities to reconfigure, redevelop, reposition etc should be considered as part of a wider development. Commercial operator demand across the retail parks and out-of-centre retailing should inform planning applications;
 - Balancing their declining market share against their important function within
 Greater Cambridge, future policies should be sufficiently flexible to enable the

- potential intensification of existing out-of-centre bulky goods retail sites (especially Beehive and Cambridge Retail Park) through reconfiguration and the incorporation of non-retail uses, though any evolution of these destinations should continue support the retention and ongoing role of retail to retain trade and to meet shopping needs;
- A long-term for vision Cambourne should be explored, consolidating the current sporadic provision, re-providing the existing food store and with due consideration to the location of the new East West Rail station.
- 10.26 A new Greater Cambridge Retail and Leisure Study has recently been commissioned to update the 2025 study, using baseline information collected in May 2025 to provide a more up-to-date baseline for the basis of determining future retail and leisure needs.

Additional alternative approaches considered

- 10.27 No policy, relying on national guidance Not considered a reasonable alternative as the Councils' consider a clear policy framework is essential to supporting the long-term vitality and vibrancy of different centres along with the shops and services they provide.
- 10.28 The implementation of Article 4 Directions was recommended in the 2025 Study, although the Plan does not recommend this option is taken forward at the present time. Analysis of Prior Approval data suggested a lack of evidence supporting their introduction. This option will be monitored as part of the Council's annual centres' 'health checks' to assess if they are continuing to meet the needs of residents and consumers.

Draft policy and reasons

10.29 The draft policy can be viewed in the Draft Local Plan:

Link will be added when draft plan is published.

- 10.30 Retail and other main town centre uses are crucial to the vitality and economic success of Greater Cambridge's urban and rural areas. Centres underpin the vitality, identity and social life of both urban and rural communities. Increasingly, they are more than just shopping locations, but places where people meet, work, socialise, access services, enjoy cultural activity and sustain daily life. Planning policy, therefore, must take a positive approach to their growth, management and adaption over time, to ensure these centres remain relevant and continue to meet the requirements of current and future communities.
- 10.31 The services and facilities already present in and around Cambridge and across South Cambridgeshire contribute significantly to the distinctiveness, vitality and resilience of the area. In Cambridge, the clustering of retail, cultural, leisure, educational and other services in the city centre, and its smaller centres, support a vibrant urban environment, while in the towns and villages of South Cambridgeshire, district, town, neighbourhood and village centres provide indispensable day-to-day amenities. Retail centres in more rural locations play a critical role in reducing travel demand, enhancing social interaction, and sustaining local employment. In more rural settings, village shops and small centres are especially important, enabling residents to meet every day needs close to home without the need to travel, preserving community cohesion and reducing dependence on mobility, while also contributing to the character and social fabric of their surroundings.
- 10.32 The NPPF requires local planning authorities to define a network and hierarchy of town centres to help promote their long-term vitality and viability, and to apply a sequential approach to development proposals that directs new retail and other main town centre uses to centres. Edge-of-centre or out-of-centre locations should only considered where there are no available sites within centres, or sites that are expected to become available. To support a clear, simple decision making in Greater Cambridge, we drew on the findings and recommendations of the 2025 study to identify a consolidated hierarchy of centres for the Plan area. This hierarchy will be used to guide development of main town centre uses, of a scale/quantum appropriate to the role and function

of the centre, to the right places; and to support the application of sequential testing of edge-of-centre and out-of-centre sites in a consistent way. This will enable the Plan to manage retail and town centre uses in a spatially coherent way, prioritising investment in centres and enabling adaptation.

- 10.33 The 2025 study offered recent perspectives on market dynamics, expenditure patterns and the evolving role of centres, which helped to inform the hierarchy of centres proposed in the policy. The consolidated hierarchy identifies three tiers of Designated Centres, grouped primarily based on their role and function, that are relevant centres for sequential testing:
 - places Cambridge City Centre at the top, which is recognised as the principal sub-regional destination for comparison retail, high-order cultural and leisure facilities, and significant day and night-time leisure uses;
 - District and Town Centres serving a wider catchment and providing a mix of comparison, convenience, service and leisure uses proportionate to their role;
 - Local Centres addressing more immediate local needs, typically accessible by walking or cycling, and providing small-scale convenience services, essential services, and local retail.
- 10.34 A fourth tier of Non-Designated Centres was also identified. These play an important, complementary role to the larger centres, acting as accessible nodes for everyday provision in local communities. However, given their primary role in meeting neighbourhood needs, they are differentiated from other centres for the purpose of sequential testing and the general application of the 'centres first' approach.
- 10.35 In an evolution of the position set out in the First Proposals, and in response to recommendations in the 2025 Study, specific consideration was given to the emerging role of new centres at proposed new settlements and strategic allocations in the hierarchy of centres. Several of the locations identified in the Study are identified in the proposed policy as Emerging Centres, reflecting the role and function they are expected to play during the Plan period. This approach enables future proposals for town centre uses in these locations to be

considered appropriately in the context of the sequential test and reflects the Councils' preference to focus growth at existing and planned town centres. More generally, the Plan expects that in new development areas and emerging settlements, particular emphasis must be placed on early delivery of retail, service and community uses. This ensures that new communities are well served from the start, that travel demand is minimised, and that centres have the opportunity to establish vitality from early phases rather than evolving solely in response to population growth.

- 10.36 The hierarchy of centres proposed in the policy broadly reflects the simplified approach recommended in the 2025 Study. For example, rural centres were considered to perform a similar role and function to that of a city's designated local centres and therefore were treated as the same type of designated centre. Similarly, minor rural centres were considered to be the equivalent of a city's Neighbourhood centre and are therefore also treated as a non-designated centre. However, in some cases the proposed approach departs from the study, in particular:
 - Adoption of a simpler sequential approach that aligns more closely with the approach set out in paragraph 91 of the NPPF;
 - Not taking forward the specific recommendation to classify Cherry Hinton
 Road, reflecting the desire to promote change through a specific allocation for
 Cambridge Junction;
 - The inclusion of The Beehive and Cambridge Retail Park as a consolidated
 District Centre in the hierarchy, which (in line with the spirit of the 2025 study's
 recommendations) will enable the Plan to promote this as a continued location
 for retail and main town centre uses and exert greater influence over its
 potential redevelopment, consolidation and diversification.
- 10.37 Some exceptions to the sequential test have been included, to reflect exceptions in the NPPF (small-scale rural offices or other small scale rural development), more closely reflect the Plan's preferred position on the location of offices (as set out in Policy J/NE), and to reflect the desire to promote proportionate ancillary development to serve workers in employment parks (as

set out in Policy J/EP), which may include some uses contained within the main town centre uses definition in the NPPF.

- 10.38 The NPPF also requires local planning authorities to require town centre impact assessments for retail and leisure applications outside town centres. To safeguard the health of Greater Cambridge's network of centres, a gross floor area threshold of 300 square metres has been set within the policy on the basis of the evidence and recommendations in the 2025 study. A floor area threshold of this scale ensures that both the individual and cumulative impact of small-scale retail or leisure developments can be robustly assessed.
- 10.39 In addition to robust testing of proposals for main town centre uses outside centres, the policy also establishes simple, specific tests for:
 - new retail and town centre uses proposals across all centres (including the Primary Shopping Area);
 - reconfiguration of existing town centre units (outside the Primary Shopping Area);
 - proposals that would result in loss of town centre uses in centres (outside the Primary Shopping Area); and
 - residential development in centres (outside the Primary Shopping Area).
- 10.40 Collectively, these aim to promote appropriate town centre redevelopment and intensification, including the repurposing of underutilised floorspace, that maintains and enhances the role, function and character of the centre and supports its vitality, viability and diversity; whilst safeguarding against changes that would risk undermining these aims. We aim to strike a balance, recognising that flexibility will be key in maintaining the vibrancy of Greater Cambridge's centre and supporting their natural evolution, whilst reflecting that change will require careful management to avoid any adverse impacts that might ultimately undermine the centre's purpose or alter its character. Specific tests for the Primary Shopping Area are established separately in Policy J/SA, reflecting the unique controls needed to safeguard its role and function.

- 10.41 Changes involving the loss, sub-division or amalgamation of retail or main town centre units in centres are subject to particularly strong controls, noting the risk that such development poses to the role and purpose of centres. These would only be supported where there is demonstrable evidence over a sustained marketing period that there is no demand for the site for its existing use or other, alternative town centre uses, or where the proposed replacement use clearly contributes to community benefit without undermining centre function.
- 10.42 The NPPF specifically recognises the role that residential development can play in ensuring the vitality of centres. Compared with the adopted Local Plans, the policy therefore establishes a clearer position on how applications for residential uses would be considered in centres (excluding the Primary Shopping Area, which is dealt with in Policy J/SA). These may be acceptable in some instances, primarily in upper floors above other main town centre uses, where marketing evidence demonstrates no demand for alternative uses and provided that issues such as noise, access and compatibility with neighbouring uses are properly mitigated. In particular, the Cultural Infrastructure Strategy for Greater Cambridge (2025) identifies the risk that residential development adjacent to live music and cultural venues might give rise to complaints that threaten those venues' continued operations; therefore, decision-making will need to ensure that development, particularly within Greater Cambridge's network of centres, is complementary. For example, residential uses should not inadvertently curtail retail development or cultural activity in designated centres.
- 10.43 The 2025 Study highlighted a policy requirement to test the appropriateness of new retail and leisure floorspace and mix of uses within the remit of a robust retail and leisure impact assessment. The reasoning for this is to ensure proposed district and local centres are of an appropriate scale to meet local needs, rather than delivering new 'destination' town centres that might compete with the wider network of town centres. This recommendation was therefore included in the draft policy with the caveat that this should be undertake in a proportionate way based on the level of detail known about a strategic site. The supporting text for the policy clarifies the specific evidence that the local

planning authorities would expect to be prepared to support impact testing. This policy requirement would include the scenario where a new centre has been designated but without a specific permissible floor size or a revised network of centres for a new settlement or large urban extension is proposed, especially where there is a large difference in floorspace between what was allocated and proposed.

- 10.44 In some circumstances, it is not always possible for an up-to-date Retail and Leisure Study to be able to accurately quantify the amount of retail and commercial leisure floorspace that a large development will generate or identify a new development's network of centres (for new settlements and urban extensions). These are often encountered when a development's scheduled start date is not expected until the later part of the plan period. Changes in consumer trends, transport improvements and other retail developments within the development's catchment area will affect demand for new shops and other town centre services.
- 10.45 Embedding a coherent and justified network of centres, with clear expectations for retention, change and growth of uses, helps ensure that Greater Cambridge's centres remain resilient, accessible and responsive to future change, while continuing to meet the needs of all residents, workers and visitors.

Response to main issues raised in representations

10.46 The plan seeks to protect and enhance the town centres of Greater Cambridge, but there are limits to what can achieved given the flexibility provided by national planning policy and general trends in retail provision. There were mixed views on whether Article 4 notices should be used to enable greater control change of use. The supporting text around the proposed policy clarifies the potential for these to be considered outside the plan making process, subject to there being sufficient evidence, but also highlights the potential for other planning controls, including conditions, to restrict inappropriate conversions wherever possible.

- 10.47 Some representors sought an emphasis on protecting rural shops and services. Reflecting the vital role these play in maintaining the rural economy and serving the day-to-day needs of residents more sustainably, the proposed policy incorporates specific protections for main town centre uses across Greater Cambridge's full network of centres, including both rural centres and minor rural centres, but also affords protection for village shops and services in smaller villages not part of the centres hierarchy. These are tied to the criteria established in Policy W/CF Community, Sports, and Leisure Facilities. The policy directs proposals for new town centre uses to the larger designated centres, in line with the proposed hierarchy, ensuring proposals are of an appropriate scale to the location.
- 10.48 In response to the comments raised around education uses in town centres, the NPPF is clear that education facilities should not be considered a main town centre use and, as such, are not subject to sequential testing. The policies in the draft Local Plan collectively do not preclude education uses within the network of centres, with the exception of within ground floor spaces within the Primary Shopping Area (see Policy J/SA), however proposals would be considered on their merits in line with the general requirements of this policy and other relevant policies in the Plan, in particular Policy WS/CF Community, Sports and Leisure Facilities which establishes criteria for the provision of new facilities, including education.

Further work and next steps

- 10.49 The Greater Cambridge Shared Planning Service has commissioned a new Greater Cambridge Retail and Leisure Study, to update the April 2025 version. This will support the ongoing development of the Greater Cambridge plan and will be reviewed in conjunction with the feedback from this consultation to support the finalisation of our policies. The new study will:
 - Provide a further updated baseline report to provide a review of current retail
 and leisure provision in Greater Cambridge, reflecting various changes

(especially within the city centre) that are not reflected in the surveys used for the 2025 study.

- Update previous recommendations on floorspace needs for convenience and comparison goods and leisure, including providing more specific, detailed recommendations for new settlements and strategic allocations.
- Outline a clearer approach for longer-term strategic sites, where it is difficult to quantify the level of retail floorspace needs beyond 10 years.
- Enable further development and refinement of the proposed hierarchy, including the approach to emerging centres.



11. Policy J/SA: Cambridge city's primary shopping area

Issue the plan is seeking to respond to

- 11.1 Paragraph 90 of the National Planning Policy Framework (NPPF) states that planning policies 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. This includes using planning policies to define primary shopping areas.
- 11.2 The majority of Cambridge's floorspace for retail and commercial leisure activities is concentrated within a definable primary shopping area (PSA). As such, the City Centre's PSA 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. Therefore, the draft Local Plan seeks to set out a positive approach to development within the Primary Shopping Area designation whilst ensuring its retail frontages are strongly protected to maintain their vibrancy and vitality.

How the issue was covered in the First Proposals consultation

11.3 No specific policy covering Cambridge City Centre's Primary Shopping Centre was proposed. However, during the drafting process, it was considered that the Local Plan would be clearer and more effective with a standalone policy which identifies clear, specific criteria which would only apply in the PSA and not other centres. This approach remains consistent with paragraph 90 of the NPPF, which states policies should "make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre".

Policy context update

11.4 Please see section under Policy J/RC: Retail and Other Complementary Town Centre Uses.

Summary of issues arising from First Proposals representations

- 11.5 Cambridge's city centre was a key issue raised in response to Policy J/RC. Some respondents, such as the Universities Superannuation Scheme, supported the development of a specific approach to retail policy for Cambridge City Centre, including its shopping areas. Histon and Impington Parish Council questioned whether the City Centre would be able to support leisure activities. Others highlighted that flexible approaches may be needed to use classes to combat empty shops and help the City Centre function as an experiential destination, whilst some objected to the use of planning controls to control the change of use of existing buildings.
- 11.6 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence

11.7 Please see section under Policy J/RC: Retail and Other Complementary Town Centre Uses, which provides a summary of the Retail and Greater Cambridge Retail and Leisure Study (April 2025) ("the 2025 Study") which has informed the development of this policy.

Additional alternative approaches considered

11.8 No policy and rely on national policy and guidance and the other policies in the plan. This was not considered a reasonable approach because the majority of Cambridge's floorspace for retail and commercial leisure activities is concentrated within a definable primary shopping area (PSA). This means a distinct approach to development within the Primary Shopping Area is essential to ensure its role, function, and retail frontages are adequately protected to maintain its vibrancy, vitality and diversity.

Draft policy and reasons

- 11.9 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy.
- 11.10 During the policy drafting stage for the Policy J/RC: Retail and Other Complementary Town Centre Uses and Policy S/PA/CC Cambridge City Centre, it was decided to develop a bespoke policy approach for Cambridge City Centre PSA.
- 11.11 The National Planning Practice Guidance (PPG) emphasises that whilst the NPPF has removed reference to primary and secondary shopping 'frontages', authorities may, where appropriate, wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres. These frontage allocations would, combined, form the Primary Shopping Areas, a defined area where retail development is concentrated.
- 11.12 Given the PSA's importance, at the Greater Cambridge and wider subregional scale, for shopping, tourism, cultural, arts and recreational pursuits, additional, stronger safeguards are needed to prevent changes of use that would undermine its ability to perform its role and function. These include requiring applications for reconfiguration of units or the loss of town centre uses to undertake additional Financial Viability Testing before the development would be deemed acceptable, and implementing specific safeguards against the introduction of residential uses in the PSA which may undermine its unique sub-regional role and centre for the nighttime economy. Such spaces may be at particular risk from noise complaints or have their operations restricted by the development given their concentration within the PSA.
- 11.13 The Cultural Infrastructure Strategy for Greater Cambridge (2025) identifies the risk that residential development adjacent to live music and cultural venues might give rise to complaints that threaten those venues' continued operations; therefore, decision-making will need to ensure that development, particularly

within Greater Cambridge's network of centres, is complementary. For example, residential uses should not inadvertently curtail retail development or cultural activity in designated centres.

11.14 The 2025 Study also recommended the policy provides a clearer land usebased definition for acceptable ground floor uses in the PSA to allow it to continue to perform its retail function along with other high street uses and maintain vibrant and active frontages.

Response to the main issues raised in representations

11.15 The policy responds directly to the feedback received in the First Proposals by proposing a specific policy for the Primary Shopping Area, which puts in place additional safeguards against inappropriate uses and proposals that would harm the role and purpose of the City Centre. The policy also, in response to comments raised by respondents, clarifies the range of specific uses (beyond retail) that would be deemed acceptable in ground floor spaces, and provides particular support for leisure and cultural development that would complement ground floor uses, recognising the need for additional flexibilities to enable the city centre to evolve sustainably whilst supporting its vibrancy and vitality.

Further work and next steps

11.16 The Greater Cambridge Shared Planning Service has commissioned a new Greater Cambridge Retail and Leisure Study, to update the April 2025 version. This will support the ongoing development of the Greater Cambridge plan and will be reviewed in conjunction with the feedback from this consultation to support the finalisation of our policies.

12. Policy J/VA: Visitor accommodation, attractions and facilities

Issue the plan is seeking to respond to

12.1 The visitor economy is an important sector for Greater Cambridge. The benefits it brings are wide ranging, from contributing to economic growth more generally to supporting the operation of key economic sectors and providing a variety of employment opportunities that are accessible to local residents. It is important that the supply of visitor accommodation in Greater Cambridge meets the needs of leisure and business visitors and that attractions provide a good mix of activities, whilst at the same time recognising and protecting the area's character and environment and the amenity and community cohesion of local communities.

How the issue was covered in the First Proposals consultation

12.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

Policy J/VA: Visitor accommodation, attractions and facilities

12.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

Topic cover - Jobs Topic.

Policy context update

12.4 A government consultation in 2023 proposed the introduction of a use class for short term lets and permitted development rights to provide flexibility where there are no local issues with such uses. However, such a change has not yet been implemented.

- 12.5 In the Cambridge Corporate Plan 2022-27 one of the strategic objectives to support Leading a Sustainable and Inclusive Recovery is to ensure a varied cultural offer is available to all those who live, work and study in, and visit, Cambridge from all backgrounds and incomes.
- 12.6 A key activity in the South Cambridgeshire Corporate Plan includes support for and promotion of high streets, commercial areas and markets in order to promote their vibrancy and health.
- 12.7 The draft Destination Management Plan for Greater Cambridge, December 2024, identifies six priorities:
 - (1) Give visitors reasons to stay longer in the area and explore further to increase visitor spending and increase economic impact within and beyond Cambridge and to reduce the pressure on Cambridge's major public spaces.
 - (2) **Empower visitors to explore further** by inspiring and informing visitors about what they can see and making it as easy as possible for them to plan their visit and travel, wherever possible using public transport.
 - (3) **Support a balanced, liveable and thriving historic centre** with public spaces well organised with visitor flows pro-actively managed with data-driven planning and management. Investment should prioritise a balanced range of shops, restaurants and amenities catering for everyone as well as a thriving evening economy with diverse cultural programming to give visitors and locals reasons to stay longer.
 - (4) Engage with and create value for everyone in Greater Cambridge to narrow the socio-economic gap In Cambridge by creating opportunities for shared participation in the city's cultural life and tourism offer, and by creating economic opportunities through fair work and skills development.
 - (5) Leverage and harness potential of Cambridge's global reputation by harnessing the potential of the city's world-renowned reputation for academic excellence and as a hub for innovation, technology and sustainability plus the city's unparalleled heritage in sciences and discovery to create a strong, compelling and impactful destination narrative.

(6) Transition towards low-carbon, inclusive and accessible Greater Cambridge with all delivery partners take all measures possible to help visitors and visitor economy businesses to take climate action.

Summary of issues arising from First Proposals representations

12.8 The consultation on the First Proposals indicated that in general there was support for the proposed policy direction. CBC Ltd indicated that a need for visitor accommodation, for both business and visitor use, and a conference centre had been identified at Cambridge Biomedical Campus. Marshall Group Properties stated that there are opportunities at Cambridge East to provide a range of retail and leisure services and facilities. There were requests for recognition in the policy of the potential role of retail centres, and particularly the city centre, in providing space for new visitor accommodation and attractions.

12.9

- 12.10 Concern was expressed over the loss of housing to short terms letting accommodation. There were also concerns over the capacity of visitor attractions to accommodate increased visitor numbers, with the levels likely to grow given growing population in the area and the development of new visitor accommodation. There was a request that the policy should support well-designed, sustainable improvements to existing attractions and a suggestion that new visitor accommodation should be asked for a contribution to mitigate their impact. Greater clarity was requested regarding when new attractions would be acceptable in rural areas and concern that the policy would have the potential to conflict with the Plan's green infrastructure policies.
- 12.11Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement (add date).

New or updated evidence base

12.12Using projections based on the drivers of demand in both source markets and Greater Cambridge as a destination, the Greater Cambridge Hotel Needs Study (Colliers, 2025) identifies a need for between 1,557 (low growth) and 3,740

(high growth) additional bedspaces between 2024 and 2045. The base case need, the most reasonable and likely scenario, is for 2,200 new bedspaces. The report estimates that 2,000 of these new bedspaces are needed in Cambridge city centre and its periphery (3 miles) by 2045. Due to its appeal for leisure and business travel, the city centre area (as defined in the report) is considered to be particularly attractive for hotels therefore it is assumed that it could accommodate 50% of this need. The southern periphery, including the Cambridge Biomedical Campus, is identified for 400 new bedspaces with the remaining 600 bedspaces in the remainder of the periphery area.

- 12.13The report recognises the constraints on development and the competition for sites in the city centre, stating that the number of bedspaces in the periphery may need to be much greater if suitable hotel sites cannot be found in the more central area through conversions or (re)development. However, with hotels being part of a city's infrastructure and driving the visitor and evening economy, the report states that there is good reason to look favourably upon the more central location of hotels.
- 12.14A modest growth in the need for hotel bedspaces is projected in the remainder of South Cambridgeshire. A base case need of approximately 220 new bedspaces to 2045 is identified. Where new settlements are underway or planned in this area, Cambridge is identified as the main draw of demand rather than major drivers of room night demand being generated internally. However, greater overspill of demand from Cambridge could be expected if the city is not able to provide sufficient room supply since the new locations are well-connected for access to the city.
- 12.15The report indicates that with the visitor accommodation currently under construction in the city centre and the southern periphery will start in 2027 and continue until 2045. In the north and north eastern periphery it will begin in 2031 and in the remainder of the periphery and in South Cambridgeshire in 2036. If other visitor accommodation that has been mooted but has uncertain delivery timings is implemented in 2028 then there would be an excess supply

- in the early years of opening with a return to new room supply need in the base case scenario from 2032.
- 12.16A key element in the location of hotels includes access to and from the hotel, and also access to destinations to be visited during the guest's stay. Rail access and safe walkability day and night, and/or road access and parking are identified as particularly important. Local bus provision is considered to be less important due to uneasiness in understanding routes, where to get on and off, and how to pay.
- 12.17In terms of nature and size of hotel demand, the study finds that there is scope in Cambridge city centre for more accommodation at mid and lower price points. Upper upscale accommodation is well supplied at present in the centre but demand will grow again however there is a lack of viability for luxury bedspaces. On the southern periphery there are opportunities for all different types of accommodation and in the other areas of Greater Cambridge the opportunities lie in the lower and mid-price points.
- 12.18More generally, the study states that an excess of permissions is required for targets to be realised in allocations for hotel accommodation, A significant proportion of permitted projects do not come to fruition. This means that a greater extent of sites, and advantageous sites and conditions for hotel operations, need to be considered for hotels in order for those that ultimately get developed to fulfil the room supply requirement forecasted.
- 12.19The study also examines the short terms lettings market. AirDNA (Airbnb and VRBO listings) data shows 1,050 active rentals in a AirDNA-defined Cambridge submarket area. Listings have grown by 8% between June 2022 and May 2025. Entire home rentals were the most popular listing type, accounting for 65% of all supply. Over half of these (75%) were studio, 1-bedroom and 2-bedroom homes.

- 12.20In 2024 booking demand in the Cambridge submarket outpaced 2023 demand for the majority of the year, whilst 2025 demand so far has outpaced 2024 aside from in March. This suggests a growing demand. This is not only driven by demand for Cambridge city locations. Booking demand in the previous three years in the Cambourne submarket (just over 100 listings) shows an increase over time, and particular growth between 2023 and 2024.
- 12.21 The impacts of the growth of alternative accommodation are recognised in the study. As well as identifying the potential impacts on the housing market and the disruptive impacts for local communities, the consultants highlight that short term lets can drive down rates in the hotel market where hotels also have to account for higher operational cost base and greater regulation. The consultants conclude that investigating ways to control or regulate alternative accommodation provision will be important.

Additional alternative approaches considered

12.22 No additional alternative approaches identified

Draft policy and reasons

- 12.23 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 12.24 The main focus of need for new visitor accommodation in Greater Cambridge is Cambridge City Centre. Whilst specific sites have not been identified, the importance of the city centre is recognised in the draft policy.
- 12.25 The periphery of the city centre has played an important role in the recent growth in the number of bedspaces in the city. It will play a key role in the future either as a location where there is a perceived demand, for example Cambridge Biomedical Campus, or providing space where visitor accommodation cannot find a viable location in the city centre.

- 12.26 Where conversions of residential properties to short term lettings such as those facilitated by Airbnb and Vrbo proliferate this will impact on the supply of housing available to meet residential needs. They can also have a significant impact on the amenity of neighbours and on the character and social cohesion of an area. In Cambridge and the immediate surrounds particularly there has been a growth in this type of accommodation in recent years. It is important for the wellbeing of local communities that planning policy provides protection against the unacceptable impacts these uses can cause.
- 12.27 In rural South Cambridgeshire, beyond the defined development extent of Cambridge, there are already a number of existing outline permissions within new settlements that include new hotels. Whilst these have not yet be implemented, it is recognised that the need for further visitor accommodation is not expected to be significant albeit there may be some additional demand where locations within Cambridge are not viable. Any new visitor accommodation must be of a scale and type that reflects their location.
- 12.28 The development of new visitor accommodation can be used as a means of bypassing the Local Planning Authority's housing policies with the accommodation being used for longer term or permanent residential accommodation. Ensuring that these properties remain as visitor accommodation can be delivered through requiring details of the type of the proposed visitor accommodation alongside conditions or legal agreements.
- 12.29 Given the importance of the visitor economy to Greater Cambridge and the identified need for new visitor accommodation, the loss of visitor accommodation is only acceptable subject to it being demonstrated that it is not economically viable and that there is no interest in the property as visitor accommodation following a marketing exercise.
- 12.30 The emphasis for the management of Cambridge as a tourist destination is on extending the length of visits and continued visitor management. Cambridge would potentially benefit from the diversification of attractions, particularly

provision for families, and the enhancement of the existing visitor experience however new development will need to be limited in scale and complement the existing heritage of the city.

12.31 In South Cambridgeshire there are a number of major tourist visitor attractions, such the Imperial War Museum, and Wimpole Hall. The draft policy is intended to support existing attractions but ensure that any expansion it is in scale with its location and the nature of the facility it supports.

Response to main issues raised in representations

- 12.32 Comments in general support of the policy approach are noted. Comments suggested support for additional visitor accommodation at specific strategic sites such as the Cambridge Biomedical Campus and Cambridge East. This is addressed in the policy and site specific policies for these sites consider this issue.
- 12.33 In terms of visitor pressure, Cambridge City Council is working in partnership with South Cambridgeshire District Council and Visit Cambridge partners:

 Cambridge BID, King's College and Curating Cambridge to develop a new Destination Management Plan (DMP) for Greater Cambridge. The new DMP will provide the strategic roadmap for the sustainable development, delivery and management of tourism in Greater Cambridge. This aims to ensure that the visitor economy continues to positively contribute to the city and region in the future.
- 12.34 One representation queried what new attractions would be acceptable in rural areas given potential conflict with other policies. The draft policy clarifies that the focus is on supporting existing tourism assets, and that scheme is in scale with its location and the nature of the facility it supports.
- 12.35 The draft policy recognises the potential negative impacts of short term lettings and, where planning permission is required, introduces criteria which must be met in order for any application to be approved.

Further work and next steps

12.36 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.



13. Policy J/FD: Faculty development and specialist / language schools

Issue the plan is seeking to respond to

- 13.1 The policy outlines the circumstances where the development or redevelopment of faculty, research, administrative sites and teaching medical/hospital facilities linked to higher education institutions (including the University of Cambridge and ARU) in Greater Cambridge will be supported. The higher education institutions in Cambridge, in particular the University of Cambridge and ARU are very important institutions which support the area's economic development and appeal for students as a place to study. It is important that the Local Plan supports their growth over the plan period.
- 13.2 Similarly, given the economic contribution specialist colleges and language schools make to the local economy, it is appropriate to support their expansion in a way that manage the impacts of their growth. This policy outlines how these growth pressures should be mitigated.

How the issue was covered in the First Proposals consultation

- 13.3 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy J/FD: Faculty development and specialist / language schools
- 13.4 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Topic cover - Jobs Topic.

Policy context update

13.5 There have been no changes to the national or local policy context from that which informed the First Proposals and is set out in the Jobs Topic Paper (2021).

Summary of issues arising from First Proposals representations

- 13.6 There were not many representations in response to this policy. A parish council, the University of Cambridge, Anglia Ruskin University, and a developer expressed support for the policy. The Education and Skills Agency supported the policy direction but recommended that the supporting text makes a distinction between privately operated and state-funded education, due to changes of use under permitted development rights. Anglia Ruskin University provided a lengthy representation where they suggested improvements to the policy to better reflect their strategic priorities. B Marshall objected to the policy on the grounds that providing student accommodation for language students worsens the learning experience and leads to more under-utilised facilities and removes a source of income for low-income families. Contrastingly, F Gawthrop asked for the policy to be strengthened to not allow language students to stay in family dwellings.
- 13.7 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

13.8 There has been further engagement with both the University of Cambridge and ARU regarding their emerging estate strategies however neither of these were publicly available at the time that Policy J/FD was drafted. Engagement will continue with both universities to better understand how the emerging Local Plan can support their growth aspirations.

Additional alternative approaches considered

13.9 No additional alternative approaches identified.

Draft policy and reasons

13.10 The draft policy can be viewed in the Draft Local Plan: - Link will be added when draft plan is published.

- 13.11 The University of Cambridge continues to be a world leader in higher education and research and is a vital driver of the Cambridge economy, the main 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 13,000 jobs. Their reputation and heritage continue to attract students from across the world, tourists, language students, spin-off enterprise, medical and biomedical research, and it continues to be a vital driver of the local and national economy.
- 13.12 The University of Cambridge's key growth needs are being met by the developments in West Cambridge, Eddington and around Addenbrooke's Hospital.
- 13.13 ARU has implemented significant investment in their sites along East Road, however the campus remains constrained. A recently approved cultural district at its Cambridge campus on East Road, set for completion in 2026 will offer an enhanced learning environment, build a more vibrant University community and provide attractive and well-maintained outdoor spaces.
- 13.14 Specialist colleges and language schools also provide important economic benefits to the area. It is therefore important that these are also supported without adversely affecting the local housing market. The use of homestays and higher education accommodation outside term-time provided local families with the opportunity to benefit from housing students and a use for student halls that may otherwise remain empty outside term-time.
- 13.15 Acceptable forms of residential accommodation can take the form of homestays (with resident families in the area) and the use of existing higher education student accommodation outside term time (subject to S106 conditions) that may otherwise remain empty outside term-time along with purpose-built student accommodation within the curtilage of the college/school.

Response to main issues raised in representations

- 13.16 In addition to this policy, the Eastern Gate Public Realm Improvement Area covering ARU's East Road campus is proposed in the draft plan. Together, these policies support ARU's approach that their East Road campus and the wider area along East Road is the most sustainable locations for faculty development for ARU during the next plan period.
- 13.17 Further clarification has been provided to make clear that homestays are an acceptable form of off-site residential accommodation. This would mean a family remains resident in the property with one or more students. However, entire residential properties used to accommodate specialist college or language school students (and staff) with no resident family is not an acceptable form of off-site residential accommodation.

Further work and next steps

13.18 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

14. Policy J/RW: Enabling remote working

Issue the plan is seeking to respond to

- 14.1 Whilst there has been trend towards workers working all or part of their working week from home over recent years, the COVID-19 Pandemic dramatically accelerated this shift. Post-pandemic, the trend in working only from home has fallen to 13% in October 2024 however the level of hybrid working has risen with 28% of workers partly travelling to work and partly working from home.
- 14.2 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.

How the issue was covered in the First Proposals consultation

14.3 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here:

Policy J/RW: Enabling remote working | Greater Cambridge Shared Planning

14.4 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail.

Topic cover - Jobs Topic

Policy context update

14.5 There have been no changes to the national or local policy context from that which informed the First Proposals, and is set out in the <u>Jobs Topic Paper</u> (2021).

Summary of issues arising from First Proposals representations

14.6 Some parish councils, developers, developers, political organisations and the University of Cambridge expressed support for the policy. A few respondents, including Carbon Neutral Cambridge, emphasised the importance of ensuring the policy Greater Cambridge's rural communities. Two commenters, including Central Bedfordshire Council, argued that the policy could be strengthened to refer to the provision of home office space in new dwellings as the emphasis is currently on the delivery of external hubs or extensions. The Cambridge and South Cambridgeshire Green Parties asked that extensions were rigorously tested for proof of a need for homeworking.

New or updated evidence base

- 14.7 Analysis of the ONS Opinions and Lifestyle Survey shows that 28% of working adults in Great Britain were hybrid working in the autumn of 2024. While the trend in working only from home has fallen to 13% since 2021, a hybrid-working model (part travelling to work, and part at home), has become the 'new normal' for around a quarter of workers. A study from Stanford University that surveyed college graduates in 40 countries across the Americas, Europe, Asia and Africa during November 2024 to February 2025 found that on average the level of working from home in Greater Britain is 1.8 days a week. Only Canadian workers worked from home more often.
- 14.8 The ONS Business Insights and Conditions Survey (BICS) (surveyed in December 2023) showed that businesses in the 'information and communication' industry had the highest share of hybrid working at 49%, closely followed by the 'professional, scientific and technical activities' industry at 42%.
- 14.9 Working from home now 'defining feature' of UK labour market | King's College London

Additional alternative approaches considered

14.10 The First Proposals policy direction proposed support for: the creation of local employment hubs, and the partial conversion, extension or change of use of residential dwellings to enable the residents to work at or from part of the dwelling 14.11 An alternative approach now considered is that a standalone policy is not required.

Draft policy and reasons

- 14.12 The draft policy can be viewed in the Draft Local Plan: Link to the draft plan policy
- 14.13 The First Proposals was drafted at a time when the pandemic had impacted on perceptions of home/ remote working. Evidence shows that whilst still important, the trend has returned to a more flexible work pattern. It is not considered that a bespoke approach to home working is required, given the options available through permitted development, the application of national room size standards, and other policies in the plan. Local employment hubs still have a role, and there are a number of private sector companies which provide this sort of facility. Opportunity for colocation of facilities in community venues, libraries or other similar facilities could offer the opportunity to support the viability of this kind of facility. This opportunity should be considered when planning for community facilities, but a standalone policy in the form originally proposed is not required.

Response to main issues raised in representations

14.14 Representations showed general support for measures to support remote working. However, a revised policy approach is now proposed.

Further work and next steps

14.15Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.