

Consultation Statement

Appendix 12: Response to Representations - Jobs



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)



GREATER CAMBRIDGE
SHARED PLANNING

Summaries of Draft Plan Representations, and Response to Main Issues Raised

Jobs

Jobs Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The representations received were wide ranging. They included the need to direct hi-tech industries to the deindustrialised parts of the UK; a request that cultural infrastructure be embedded across plan policies as core civic infrastructure and for Create Cambridge is engaged as an advisor/consultee and the need for greater consideration of walking/wheeling accessibility in new retail and office developments. The relationship between housing and employment was mentioned including planning for mixed-use neighbourhoods with specifics on how to achieve hyperlocal and interconnected employment and community amenities, the need for a clearer link between the timing of jobs coming forward and the homes needed for the growing workforce and for a mix of

homes and jobs on or nearby active travel routes. There was support from the Cambridgeshire Chamber of Commerce for the Cambridge Science Park North development.

Comments from neighbouring authorities included support for excluding large-scale warehousing and distribution centres and a call for joint working on logistics challenges across the Ox-Cam corridor. The plan for the “delivery of a flourishing, dynamic and mixed economy” within Greater Cambridge was welcomed and there was a recognition of the economies of scale that a flourishing Greater Cambridge economy brings to other areas. Requests included the need for the Plan to appreciate the factors that attract existing and future businesses, training facilities and institutions to locate, continue to reside and facilitate the opportunity for future investment in the locality and to clearly articulate the benefits and opportunities of close proximity to London Stansted airport.

Response to main issues raised in representations:

Policies in the Jobs Chapter and Strategy Chapter of the Local Plan, supported by evidence, seek to provide both an environment for a range of uses including cultural uses and to support existing key sectors recognising not only regional importance but also national and international importance. The plan has sought to consider the development strategy as a whole, considering not only economic needs, but also need for homes, infrastructure, and to protect and enhance the environment. We recognise wider links. The role of Greater Cambridge sitting at the heart of several economic corridors: the Oxford Cambridge Growth Corridor, the UK Innovation Corridor (London-Stansted-Cambridge-Peterborough) corridor and the Cambridge-Norwich Tech Corridor, has been added as a reference in the economic portrait section at the beginning of the plan. The Councils have also engaged with neighbouring authorities on the warehousing and distribution sector.

Cultural infrastructure needs have been considered to inform the local plan, including preparation of a Cultural Infrastructure Strategy and Community Facilities Studies, which have informed the Infrastructure Delivery Plan as well as policy requirements in other theme chapters.

Transport and accessibility was raised by a number of general comments on this theme. Transport has been a key consideration when identifying site allocations, and the Infrastructure and Great Places theme policies seek to ensure sites deliver well connected places. Policies on retail seek to support a range of centres to ensure facilities are accessible.

Policies Individual developments at Histon and Cambridge Science Park North are addressed in the allocations section. Having reviewed the employment land supply, there are no exceptional circumstances for release of green belt land in these locations.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	203053 (K Porrer, Cambridge City Council Liberal Democrat Group)
Support Cambridge Junction and Create Cambridge in asks that: <ul style="list-style-type: none"> • Cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • Culture is treated with parity alongside housing, transport and utilities as core civic infrastructure 	202065 (H Chamberlain), 202152 (M Ridler, Cambridge Junction), 202207 (H Tam), 202319 (L Mills, Cambridge Junction), 202401 (J Webber), 202420 (T Shaw), 202470 (K Jones), 202693 (T

<ul style="list-style-type: none"> • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans. <p>This reflects how cultural venues function in practice and ensures consistent delivery across the plan.</p>	<p>Altmann), 202723 (W Townsend), 202767 (C Woods, Cambridge Junction/Create Cambridge), 202894 (B Groisman, Cambridge Junction), 202899 (R Tinkler, Cambridge Junction), 202951 (R Tarry), 202964 (T Flinders), 203370 (N Ellis), 203452 (S Ashworth), 203498 (L Heap), 203647 (Z Svendsen, University of Cambridge), 203858 (N Yeni), 203879 (J Fritsch, University of Cambridge), 204195 (M Burman, Cambridge Junction/ Create Cambridge), 205076 (L Sheerman, University of Cambridge), 205159 (H Paterson), 205222 (J Walsh), 205375 (L Howse), 205378 (N Oakley), 205431 (E Hine, Cambridge Junction/ Create Cambridge), 205442 (A Seiglow)</p>
<p>Support for the policy but would like to see a clearer link between jobs coming forward and the homes needed for the growing workforce. The targets for both homes and jobs are not connected and for good placemaking, we need to be sure that a mix of homes both rented and to purchase, can come forward in time for those taking the additional jobs, on active</p>	<p>203053 (K Porrer, Cambridge City Council Liberal Democrat Group)</p>

<p>travel routes or nearby. If we don't do this, workers will be forced to live outside the area, with long, usually car based commutes, and new communities won't be established successfully.</p>	
<p>Criticise the focus on clustering hi-tech industries in Cambridge, likening it to 19th-century manufacturing and asking why central government does not direct investment to other de-industrialised regions.</p>	<p>203254 (I Ralls, Cambridge Friends of the Earth)</p>
<p>Horseriding and keeping is a vital and large part of the rural economy and job force in Cambridgeshire, even excluding Newmarket.</p>	<p>204036 (S Rogers)</p>
<p>The best business transport policy is the one that most reduces transport needs in the first place. This section needs greater focus on mixed-use zoning with specifics on how to achieve hyperlocal and interconnected employment and community amenities which can be easily reached with tightly integrated active transport. Cambridge already suffers from scattered zones with many residential areas lacking local leisure and shopping areas, now is the time to fix that.</p>	<p>205209 (P Colledge)</p>
<p>Support plans to provide varied and relevant jobs and emphasise the need for residents as well as commuters to benefit. One key is accessibility not just by cycle or public transport but by walking/wheeling. Not enough consideration is being given to this in new retail and office developments e.g. the Beehive and Grafton centre redevelopments, walkers/wheelers will have to travel across busy roads and via a significantly longer journey for to shops that are less likely to be cheap/bargain retail. They will have greatly reduced choice. This is likely to increase home deliveries, increasing the number of</p>	<p>205567 (L Jones, Cambridge Living Streets)</p>

<p>vehicles and level of congestion. The ‘doughnut effect’, the hollowing out of cities to periphery supermarkets and facilities, increases motor traffic and reduces walking/wheeling. It has a disproportionate negative effect on older people who rely on local shops and on walking/wheeling.</p>	
<p>Support for excluding large-scale warehousing and distribution centres and a call for joint working on logistics challenges across the Ox-Cam corridor.</p>	<p>208227 (C Barnes, Bedford Borough Council)</p>
<p>Support for the proposed development at Cambridge Science Park North, promoted for allocation in the Local Plan.</p> <ul style="list-style-type: none"> • The proposals will provide local people with access to high-value careers, strengthen the city’s innovation ecosystem, and ensure that Cambridge remains competitive globally. The focus on mid-tech and advanced manufacturing addresses a critical gap in the region, enabling research and invention to translate from nearby R&D facilities, into production and tangible economic growth. • It will strengthen Cambridge’s position within the Oxford–Cambridge growth corridor and the UK’s wider science and technology ecosystem. By providing flexible, high-quality workspaces and fostering collaboration across sectors, the site ensures that Cambridge can continue to lead in innovation, attract global investment, and support a diverse economy. • The development will create a well-balanced environment that integrates work, learning, leisure, and wellbeing. By combining economic, social, and environmental objectives, it demonstrates a commitment to inclusive growth that benefits residents, employees, and future generations. • It will strengthen education and skills development through meaningful partnerships with local schools and colleges. The inclusion of a dedicated STEM will provide learning and event space to inspire the next generation of innovators, offering 	<p>203242 (H Stewart, Cambridgeshire Chambers of Commerce)</p>

<p>practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future.</p> <ul style="list-style-type: none"> • The construction and delivery of the development presents a valuable opportunity to employ local people, support apprenticeships, and strengthen links between education providers, employers, and the local supply chain. • At Cambridge Regional College, has seen significant growth in construction-related courses, and the proposals would provide invaluable work and site experience for these learners. • Beyond construction, the development will create real-world learning environments and apprenticeship opportunities across a diverse range of subjects, supporting the local skills economy and helping businesses access the talent they need. 	
<p>Welcomes that jobs and the “delivery of a flourishing, dynamic and mixed economy” is sought to be delivered within Greater Cambridge and recognise the economies of scale that this brings, and the spread of these industries within western Essex (including Harlow and Uttlesford (Chesterford Research Park)). Recognises the fast growing economy, and the importance of Cambridge, as well as its worldwide prestige, supported by successful businesses, industries, training and educational institutions. In developing Local Plans and future planning policy, it is imperative that there is an appreciation of the factors that attract existing and future businesses, training facilities and institutions to locate, continue to reside and facilitate the opportunity for future investment in the locality.</p>	<p>210464 (Z Smith, Essex County Council)</p>

<p>The Plan must ensure that the benefits of close proximity to London Stansted airport are clearly articulated, and the opportunity this provides for those living, working, residing and investing in Greater Cambridge.</p>	<p>210464 (Z Smith, Essex County Council)</p>
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Policy J/NE: New employment development proposals

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

- There were a number of comments related to that element of the policy that restricts the size of warehouses/distribution centres. Responses were received from developers objecting stating that the policy imposes disproportionate constraints on warehousing and distribution uses and limits the Plan's ability to meet identified economic needs and provide a flexible supply of employment land that can respond effectively to changing economic and employment floorspace requirements. It was considered to be inconsistent with the current NPPF, Planning Policy Guidance, the direction of travel in the draft new NPPF, recent appeal decisions and market conditions and therefore it is considered to be unsound. There was an objection and a request from West Suffolk Council to work collaboratively to identify and address wider needs for large scale strategic logistics provision and data centres and a request for sufficient flexibility to respond effectively to changing industrial and commercial needs over time from Cambridge Ahead.
- Swavesey Parish Council and the A14 Logistics Forum supported the size limit on warehouses/distribution centres, stating that it is necessary to preserve Greater Cambridge as a university city in a rural setting and requesting that information on size, height and landscaping be provided at consultation phase. It was also stated that logistics sites should be sited as close as possible to residential centres to encourage walking or cycling and each proposed A14 sites is reviewed using this criteria. The two organisations state that logistic/commercial developments on the A14 corridor should consist of small to

medium size buildings as it would be inappropriate for scarce resources of land and water together with fragile flood management to be used to support logistics hubs where the primary focus is not on supporting the local economy.

- There was support for the Plan's intention focus on jobs growth including the provision of additional headroom and a diversity of space and for its recognition of and supportive approach to clusters but a request for sites and infrastructure to design-in flexibility to enable them to adapt to the changing economic environment and for the Plan to more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits.
- Other comments included an objection to the use of conditions limiting occupants to first occupants and concern that the policy element relating to the expansion of existing business premises in countryside is overly restrictive and impacts on businesses' ability to respond to a changing economic climate. Specific concerns were raised included the over development of the Cambridge economy and the fact that the Plan does not adequately recognise rural employment uses such as equestrian and equine enterprises.
- There were suggestions for policy changes to ensure public and active travel to sites with consideration given to see if public rights of way can be instated to provide access opportunities, the need to ensure that suitable small-scale workspaces are prioritised in villages and to widen the scope of potential Class E restrictions. The location of TTP's new Campus, Cambridge Research Park and Cambourne Business Park outside the Defined Development Extent (DDE) was queried. With TPP requesting policy alterations were its DDE inclusion not to be considered. There was a request for additional employment areas within the countryside to be identified to enable able to adapt to the evolving economic climate and meet future

business needs including at Evolution Business Park. A number of other specific sites and premises are also mentioned including concerns relating to one or more of the proposed A14 logistics/industrial sites.

- There were suggestions for policy changes to ensure public and active travel to sites with consideration given to see if public rights of way can be instated to provide access opportunities, the need to ensure that suitable small-scale workspaces are prioritised in villages and to widen the scope of potential Class E restrictions

Response to main issues raised in representations:

Comments on the policy are noted. The concern over the restrictions on large-scale of warehousing and distribution is acknowledged. It is considered that warehousing and distribution facilities serving national or regional markets are best addressed at the sub-regional level. The councils have developed a Statement of Common Ground with the Cambridgeshire & Peterborough Combined Authority, neighbouring authorities within and neighbouring the functional economic area in which Greater Cambridge sits which confirms the need to assess the need for strategic warehousing facilities serving national or regional markets across the functional economic market area (FEMA) that includes but goes beyond Greater Cambridge, working in collaboration with authorities within and authorities neighbouring the FEMA. In principle, the Cambridgeshire & Peterborough Combined Authority Spatial Development Strategy (SDS) is considered to be the appropriate planning process by which to determine the need for warehousing and logistics serving national or regional markets. Preparation of the SDS will commence in 2026 and the CPCA intends to progress it at pace. Subject to confirmation of the scope of SDS's by Government, the SDS therefore provides a credible prospect that a long term solution to the need for warehousing and logistics serving national or regional markets will be identified in the foreseeable future.

Recognising the requirements of national planning policy and guidance, Local Plan policy J/NE has been altered so that Proposals for large scale warehousing and distribution facilities providing for national or regional needs will not be permitted unless it can be demonstrated that: there is an unmet need for such facilities that must and can be appropriately provided within Greater Cambridge having regard to other policies and priorities within and arising from the Local plan; a proposal will not impede delivery of warehousing and distribution and industrial space that meets local market needs in market sector priority locations. The supporting text to the policy provides an example of what “appropriately provided” can mean - that the development does not generate traffic movements that impede the delivery of the wider development strategy. It also highlights that market sector priority locations are identified in [the Greater Cambridge Warehouse and Industrial Space Needs Study \(March 2025\)](#).

It is considered that the Jobs policies and allocations within the Plan support the Greater Cambridge economic ecosystem including seeking to maximise the benefits of key clusters and knowledge based sectors. Evidence has been commissioned for this stage of the plan to help improve understanding the needs of our key sectors, policy J/NE supports the development of existing employment floorspace and Policy J/PB seeks to protect it from redevelopment to other uses and policies for Wellcome Genome Campus, Babraham Research Campus, Cambridge Biomedical Campus, Granta Park, West Cambridge and North East Cambridge (including Cambridge Science Park) support development and intensification with additional allocations to provide a range of space for new R&D development. One comment sought additional reference to the planning policy changes that were made in the 2018 Local Plans regarding the selective management approach to the economy. As those changes were made in the previous plan, those references are not necessary.

Planning Policy Guidance on The Use of Conditions states that “A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company.” The use of a condition to ensure that there is a named user who will be the first occupant of the development has therefore been

removed from the policy and is replaced with the stipulation that occupation and use of the building by the named user will be secured for at least 1 year through a S106 agreement. To clarify that changes to Use Class E will impact development across Greater Cambridge, in the supporting text to the policy, the following sentence has been removed: “In particular, it has the potential to impact the economic function of Established Employment Areas in the Countryside.”

The requests for individual employment parks to be included in the Defined Development Extent (DDE) of settlements have been reviewed. Cambourne Business Park, the TTP site in Melbourn and Waterbeach Research Park are retained as Established Employment Area in the countryside due to the low density/landscaped nature of the sites and their rural setting. Cambourne Business Park lies outside the proposed DDE for Cambourne, noting that housing development to the south of the Park has yet to be completed. As such, for this Plan, Cambourne Business Park is located within the countryside and so is proposed to continue to be included as an Established Employment Area. It is considered that there is sufficient flexibility in Policy J/NE which allows for development of the edge of towns and villages in Greater Cambridge where proposals are well related to the built form of the settlement, the scale and form of the development would be in keeping with the category and scale of the village. Evolution Business Park is not included as an Established Employment Site in the countryside due to its location within the Green Belt.

It is considered that the policy requires employment development within villages to be appropriately scaled. Public and active travel to sites and public rights of way are addressed in Policy I/ST: Sustainable transport and connectivity.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
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Support selected	201984 (L Miller, Swavesey PC), 203055 (K Porrer, Cambridge City Council Liberal Democrat Group), 204090 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204474 (The Royal London Mutual Society Ltd)
Object selected	201712 (K Mak), 203990 (KWA Architects), 204218 (Railpen), 204507 (Tritax Big Box Developments), 205300, 211684 and 211685 (Newlands (Cambridge) Limited)
The Cambridge economy has been over-developed (and thereby ruined) for years. Jobs are needed elsewhere in the UK.	201254 (S Williams)
Personal permission to the first occupant violates national PPG 21a-015-20140306: A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company.	201712 (K Mak)

<p>The Newlands development 220 acre 'big box' distribution centres to the west of Boxworth Road will dominate the landscape and blight Boxworth. It will add significant vehicle journey to the already overloaded Swavesey Roundabout. This development is not intended to meet the local needs of Greater Cambridge - but is a large-scale national hub.</p>	<p>201282 (E Grant)</p>
<p>Part (g) should be amended to read "The site can be easily accessed by public transport and by foot and cycle" to link the development to public transport networks to benefit decarbonisation of the transport network.</p>	<p>203724 (R Comins, Cambridge Green Party)</p>
<p>Under "Established employment areas in the countryside" a point should be added which states "Any further development must contribute positively to employees being able to access the site using low carbon methods of transport via planning conditions, for example to subsidise greenways or the development of improved public transport infrastructure along with the increase in employee numbers using the site."</p>	<p>203724 (R Comins, Cambridge Green Party)</p>
<p>Where consideration is given regarding access to employment sites by foot or cycle, consideration should be given to see if public rights of way can be instated to provide access opportunities. Where PROW are unachievable, permissive footpaths and bridleways should be considered.</p>	<p>210621 and 210622 (Mr C Fitzsimons, Cambridgeshire County Council)</p>
<p>The policy should prioritise small business units, flexible workspaces, co-working, and shared-use hubs. Small-scale workspace strengthens local economy and reduces car travel; ensure new employment fits the village character. High density research parks overshadow village needs; support landowner diversification compatible with rural identity.</p>	<p>202244 (Y Murray, Girton PC)</p>

<p>Support that element of the policy that does not support proposals for large scale warehousing or distribution centres generally exceeding 9,300 square metres (100,000 square feet) and which serve a wider regional or national function.</p>	<p>201984 (L Miller, Swavesey PC)</p>
<p>Objections to the wording of Policy J/NE. It should be modified to adopt a more proportionate and flexible approach, explicitly recognising the distinct characteristics of industrial and logistics development. This should allow proposals in rural and edge-of settlement locations to be assessed on their individual merits where they can demonstrate sustainability, suitable access and appropriately managed impacts.</p> <p>Currently the policy is overly prescriptive, misinterprets the function and dynamics of the logistics industry and risks unduly restricting the delivery of large-scale industrial and logistics development serving national and regional needs. It is considered to be inconsistent with current and emerging national policy, guidance, economic strategy and market conditions, not effective in the absence of any joint working on cross-boundary strategic matters, not positively prepared and unsound. It risks excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land.</p> <ul style="list-style-type: none"> • Part 7 imposes disproportionate constraints on warehousing and distribution uses, limiting the Plan’s ability to respond effectively to changing economic and employment requirements. • Paragraph 8(a) of the NPPF 2024 states that the planning system must help to build a strong, responsive and competitive economy, to make sure that sufficient land is available in the right places at the right time to support growth. • Paragraph 23 of the NPPF is clear that Local Plans should include strategic policies that provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively 	<p>204218 (Railpen), 204507 (Tritax Big Box Developments), 205061 (Lolworth Developments Limited), 205300, 211684 and 211685 (Newlands (Cambridge) Limited)</p>

assessed needs over the plan period. There is no differentiation between Local and Strategic need. Indeed Paragraph 24 of the NPPF actively looks to enforce “effective strategic planning across local planning authority boundaries” to build economic resilience, through the duty to cooperate.

- Paragraph 26 stresses that effective and on-going joint working between strategic policymaking authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. This approach has not been adopted by Greater Cambridge. There is no such evidence within either the Duty to Cooperate’ Statement of Common Ground (October 2025) or ‘Duty to Cooperate’ Statement of Compliance (October 2025) as to how wider economic growth, or specifically strategic industrial/warehousing need, is to be met across the wider region. This is in direct conflict with Paragraph 36 of the NPPF, which requires Plans to be positively prepared. None of the adjoining authorities, currently in the process of preparing their Local Plans refer anywhere to meeting the employment needs of Cambridge and South Cambridgeshire. This is despite the Greater Cambridge Employment and Housing Evidence Update 2025 (para. 2.88) stating that ‘big box’ demand is met in the wider sub-region.
- Paragraphs 85, 86 and 87 NPPF 2024 set out planning policies and decisions should:
 - “...help create 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.”
 - Be “...flexible enough to accommodate needs not anticipated in the plan.... to enable rapid responses to changes in economic circumstances.”
 - Recognise and address the specific locational requirements of different sectors.
 - Make provision for “storage and distribution uses at a variety of scales in suitably accessible locations that allow for the efficient and reliable handling of goods.”

- “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...”
- The approach is inconsistent with the direction of travel in the draft new NPPF.
 - E1 emphasises that plans supporting long-term economic growth should avoid overly prescriptive requirements on acceptable uses and instead enable flexibility to respond to evolving commercial property demands.
 - E1.1.a also sets out a clear alignment between the economic strategic priorities and the Industrial Strategy with the plan-making. The Industrial Strategy emphasises the role of the freight and logistics sector and its part in growing the economy nationally and has stated that a new plan for the sector will be published in due course. It on this basis that anticipated regional and national priorities for the sector will be further weighted in the near future, making it even more important to consider those needs now as part of emerging plans.
 - E1.1.c. echoes Paragraph 85 of the NPPF by requiring plan makers to allocate sites to meet anticipated needs, and facilitating development to meet the needs of a modern economy, including storage and distribution operations at a variety of scales and in suitably accessible locations.
 - E1.2 states that development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage)
 - Paragraph E3 further recognises the particular physical and locational characteristics of freight and logistics development, including the need for access to strategic transport infrastructure and, in some cases, larger buildings.
- The only apparent justification for not planning for anything other than local logistics/warehousing need is predicated on the ‘high land take’ and undefined ‘local pressures’ on land supply of specialist sectors, yet the Council’s own evidence base already provides allocations for R&D/Life Science Space, well beyond the need that has been assumed by Iceni. To argue there is

insufficient land to accommodate specialist sectors is wholly untrue. To the contrary, a very large amount of land has been proposed for release in other locations, closer to central Cambridge for a large quantum of R&D/Life Science floorspace, which has not been supported for release by the Authorities.

- NPPG clearly acknowledges that storage and distribution uses have a set of inherent locational requirements, in that developments must be located close to a strategic road network on large sites, with sufficient access to power and labour (NPPG 031 ref: 2a-031-20190722). These characteristics clearly demonstrate that the locations typically occupied by Life Sciences and R&D uses are not suited for storage and distribution uses, so there is no competition for land between these operators.
- Guidance in the Housing and Economic Needs Assessment section of the NPPG Paragraph 031 (Reference ID: 2a-031-20190722) advises plan makers on how local authorities should assess need and allocate space for logistics uses. By only accommodating for local industrial/warehousing needs, the Draft Local Plan departs from this NPPG. Engagement with other local authorities and logistics developers/occupiers is lacking from the evidence base, while demand for large-scale logistics uses, serving regional and national operations, has not been assessed.
- A similar West Suffolk policy as reworded by the Inspector and the restriction on large scale strategic logistics was removed. The new wording reflected Policy SP22(d) which enables large-scale logistics uses so long as it can be demonstrated that such proposals would not be detrimental to more localised needs. This is not relevant to Greater Cambridge as there is evidence of need.
- There is evidence of latent demand for larger scale units in the area from market signals, reflecting enquiries and activity and stakeholder engagement. Evidence shows that warehouses are becoming larger in scale to suit occupier demands.
- Evidence also suggests that average clear heights for buildings have also increased and demand for taller buildings has significantly increased. Therefore the size and height of buildings is

essential to ensure properties are successfully let and do not become obsolete in a short period of time.

- There is no evidence that large-scale warehousing units above 9,300 sq.m (100,000 sqft) are solely accommodating national or regional needs. A fixed threshold does not determine the type of occupier or the market being served.
- There are already a number of both local and national/international companies operating in Greater Cambridge that occupy industrial units above 100,000 sqft e.g. Hain Daniels, Hexcel etc.
- Compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich, the presence of larger-scale industrial units is significantly higher. This highlights that markets need this segment to function appropriately, and emphasises Greater Cambridge market's gap in the stock offer.
- As a result of the policy restriction for the last eight years - there have already been two businesses - namely Marshalls and DHL - that have had to relocate from Greater Cambridge due to a lack of availability of premises of sufficient scale.
- Given the Planning Practice Guidance ('PPG') paragraph 031 advises that, where needs for strategic facilities exist, policy-making authorities should collaborate with infrastructure providers and other parties to identify the scale of need across the relevant market, and the authorities will then need to consider the most appropriate locations for meeting these identified needs and E2.2 of the draft reformed NPPF states that, if market signals demonstrate undersupply of specific types of land or premises, considering the relevant catchment area (which could expand beyond Greater Cambridge's boundaries), or specific locational requirements exist, then, in compliance with the proposed NPPF S5, the development could be permitted, there is the risk that such units would be promoted outside the provisions of the GCLP.
- Bidwells note 'Need for B2/B8 in Greater Cambridge' (January 2026); "By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors¹ ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc. Clearly there has been an

intentional suppression of these industrial sectors in Greater Cambridge through planning policy since at least the 1990s and is now manifesting itself through a notable difference in economic output.”

- Recent appeal decisions reinforce the importance of flexibility and choice within employment land markets. For example, the Beehive appeal decision (APP/Q0505/V/25/3360616), the Inspector emphasised that maintaining an adequate and diverse supply of employment land is critical to keeping the market fluid, accelerating delivery, and reducing the risk of investment being lost overseas. The decision makes clear that quantitative targets, including those in the Icen analysis The Greater Cambridge Growth Sectors Study September 2024, should be treated as reference points rather than caps, and that a diversity of site types, locations and offers is essential to meeting demand and maximising job creation.
- There is clear evidence that industrial, storage and distribution uses are essential parts of the supply chain that support those sectors that are perceived to be of higher value by Greater Cambridge. Therefore, a failure to plan sufficiently for local and strategic industrial and logistics space will serve to undermine the wider economic ecosystem.
- The policy creates a disproportionate bar for industrial and logistics development, which typically requires larger plots, specific access arrangements and locations beyond tightly constrained settlement boundaries.
- It risks excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land, contrary to national policy and recent appeal findings. It is not effective, as it may prevent appropriate industrial and logistics schemes from coming forward simply because they cannot satisfy the policy requirements, despite being sustainable in principle.
- The policy provides limitations in terms of any future proposal’s viability, as it constrains market flexibility and future occupiers’ choice by limiting options for larger units which, based on market evidence, are subject to high levels of demand.

<p>Recommend that the policy read “Large scale warehousing and distribution centres providing for national or regional needs will not be permitted prioritised in Greater Cambridge. The focus is on meeting the identified Greater Cambridge needs for an appropriate range of warehousing and industrial uses and unit sizes.”</p> <p>With supporting text “However, proposals for large scale warehousing or distribution centres will not be prioritised as the aim of the policy is to provide for a wide range of uses, types and sizes to meet demand across the local area”.</p>	<p>205061 (Lolworth Developments Limited)</p>
<p>TTP continues to grow, in particular its core consulting activities are expanding rapidly. To support this growth and deliver for its expanding client base, there is a continuing need to create additional office and research space on the TTP Campus. It is critical that the new Local Plan policies support this. The Campus opened in Spring 2023 following planning approval in 2018 and a Section 73 permission granted in 2020 (S/4535/19/VC). The Campus has been the recipient of a number of major design awards including the Greater Cambridge Design and Construction Award 2024 and more recently in October 2024, winning the national Corporate Workplace Award from British Council of Offices which is one of the most prestigious awards in the country.</p> <p>Welcome the designation of the TTP Campus at Melbourn as an Established Employment Area in the countryside. Consider the TTP Campus to be clearly part of the extent of the built-up area and not isolated in open countryside or detached from the main concentration of buildings within Melbourn. A Local Plan that is positively prepared, justified, effective and consistent with national policy should</p>	<p>204851, 210719, 210720 (TTP)</p>

<p>identify the TTP Campus as a site on which new employment development should be supported, and (having regard to the Councils' own Supporting Information to 'Policy S/DE) it should be designated as being part of the Melbourn Defined Development Extent.</p> <p>In the alternative situation that the Site remains designated as an 'Established Employment Area in the countryside', it is important that the proposed requirement for developments to 'reflect their location' is considered having regard to the aims of the policy as set out in the Supporting Information, namely to support businesses to locate, grow and evolve, and that the provisions of the Local Plan are clarified to make clear that applications within Established Employment Areas on the edges of villages will be assessed having regard to their village location.</p>	
<p>Support the policy approach in principle but question the basis on which the Established Employment Areas have been identified. J/NE should go further by identifying additional employment areas within the countryside that already make a strong contribution to the rural economy and support a number of jobs. This is vital in ensuring such areas are able to adapt to the evolving economic climate and meet future business needs to maintain vitality of the rural economy and negates the need to plan for access requirements and connectivity to sustainable modes of transport, as these are already established.</p> <p>To ensure that the Council not only meets this minimum need, but is also able to respond to evolving need, additional land should be identified to accommodate growth including additional sites as Established Employment Areas, and especially those that relate well the settlement hierarchy for directing growth and that already make a strong contribution to employment within the area. Therefore it</p>	<p>206950 (Cambridge Realty Limited)</p>

<p>is requested the Evolution Business Park, including the adjacent parcel of land that is suitable to accommodate expansion, is included within the list of Established Employment Areas.</p>	
<p>Support the policy element relating to the expansion of existing business premises in countryside in principle but it is overly restrictive. Specifically, the requirement to demonstrate 2 years of operation and identify a named user for the development inhibits the ability of businesses within the countryside to respond robustly and dynamically to material shifts in business needs. It should be reconsidered to ensure that rural business is truly afforded the conditions by which to grow and evolve in response to an ever-changing economic climate.</p>	<p>206950 (Cambridge Realty Limited)</p>
<p>Question whether a. Cambourne Business Park is located within the countryside under Part 5.</p>	<p>204997 (A Brand, Abbey Properties Cambridgeshire Limited)</p>
<p>Support for Cambridge Research Park's (CRP) designation as an Established Employment Area in the countryside under Section 5b, although highlight that CRP should be viewed as being within an urban location given it's adjacent to the new town of Waterbeach.</p>	<p>204474 (The Royal London Mutual Insurance Society)</p>
<p>Endorse the policy approach of Section 4, which allows employment development in Established Employment Areas in the countryside, where they are of a scale and character that reflects their location to promote job creation, and their exclusion from 'Expansion of existing businesses in the countryside' section 6.</p>	<p>204474 (The Royal London Mutual Insurance Society)</p>
<p>Flexibility regarding the removal of restrictive planning conditions in the Draft Greater Cambridge Local Plan into policy J/NE, as outlined in the current South Cambridgeshire Local Plan 2018, and in line with</p>	<p>204474 (The Royal London Mutual Insurance Society)</p>

<p>paragraph 85 of the NPPF 2024 is requested to support economic growth and facilitate business investment and expansion, particularly for established high-tech and R&D sites.</p>	
<p>In light of the West Suffolk local plan approach, NPPF and PPG, the council asks Greater Cambridge to work collaboratively with its neighbouring authorities, including West Suffolk to seek to identify and address wider needs for large scale strategic logistics provision and data centres arising from national and regional demand and taking a strategic cross border approach. In particular as no provision for large scale B8 units or those meeting regional or national demand is made in allocations S/RRA/SCS and S/SHF and neither does policy J/NE support such proposals.</p>	<p>204769 (J Baird, West Suffolk Council)</p>
<p>Para 8.18 of the supporting information - the Class E restrictions seem to only apply to Employment Areas in the Countryside - should this not also be available across Greater Cambridge as the issues with change of use may impact on other developments when permission is granted.</p>	<p>203055 (K Porrer, Cambridge City Council Liberal Democrat Group)</p>
<p>Welcome:</p> <ul style="list-style-type: none"> • The Local Plan's intention to take projected jobs growth as far as is defensible and supports the use of robust local evidence that Cambridge Ahead commissions. • The inclusion of additional headroom in both jobs and housing projections which appropriately reflects Cambridge's growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. • The draft Local Plan's supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade, is welcomed. • Recognition of infrastructure supporting the innovation economy, including densification at Whittle Laboratory, proposed growth at Babraham, and the proposed innovation hub. • The Plan's recognition of the global importance and growing breadth of scientific activity within major clusters 	<p>203530 (E Pritchard, Cambridge Ahead)</p>

<ul style="list-style-type: none"> • The Plan's support for developments that strengthen clusters, including its recognition that the Cambridge ecosystem requires a diverse range of commercial space to accommodate different stages of business growth. • The approach the Local Plan has taken to setting out how land should be used to support the wider economy is welcome, particularly the allocation of space for industrial, logistics and mid-tech uses, which helps promote a more balanced economy and address existing shortfalls. <p>Would like to see:</p> <ul style="list-style-type: none"> • The Local Plan, future spatial and housing strategies and supporting infrastructure need to design-in flexibility so that they can adapt to changing patterns of economic activity, new economic sectors and the future needs of a growing and more diverse population. • The Plan more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits. • The approach to industrial and warehousing provision retains sufficient flexibility to respond effectively to changing industrial and commercial needs over time. 	
<p>The policy does not adequately recognise rural employment uses such as equestrian and equine enterprises. These are typically sui generis businesses that require large areas of land, modest built form and countryside locations, and cannot be accommodated within defined employment areas. The policy should:</p> <ul style="list-style-type: none"> • be amended to explicitly recognise specialist rural and land based businesses, including equine and equestrian enterprises falling within sui generis use, as a distinct and important component of the rural economy. • Support the development, expansion and modernisation of such businesses in countryside locations where a functional need for extensive land holdings can be demonstrated, acknowledging that the built footprint may be limited relative to the site area. 	203990 (K Warth, KWA Architects)

<ul style="list-style-type: none"> • Make clear that proposals which are necessary to secure the viability of established rural businesses, including stud farms, training yards and associated facilities, will be supported where landscape, environmental and amenity impacts can be satisfactorily mitigated. • Give greater weight to economic benefits, including employment generation and contribution to the rural economy, particularly in areas with functional links to the wider equestrian and racing industry. This would ensure the policy is consistent with national guidance on supporting a prosperous rural economy. 	
<p>Horseriding and keeping is a vital and large part of the rural economy and job force in Cambridgeshire, even excluding Newmarket.</p>	204037 (S Rogers)
<p>Since the policy makes specific reference to site allocations, it is requested that the allocations be updated as per the submissions requested on the NEC and Station Road West sites, to ensure that new employment development can be delivered in accordance with Policy J/NE.</p>	204090 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
<p>There should be a site specific exception from the Green Belt for site 115407 for commercial and recreational use. 71% of residents in a recent consultation support the proposal and the high-quality recreational space it would provide. It would provide a net benefit to the community. It is uniquely positioned for sustainable development, benefiting from exceptional connectivity. To meet regional economic demands, consolidated, high-impact employment hubs are advocated rather than fragmented, smaller developments. By integrating a dedicated Country Park and diverse employment opportunities (including apprenticeships), this proposal offers greater long-term community value than its current Green Belt designation.</p>	201727 (S Jocelyn, Histon & Impington PC)
<p>The Council should be considering the higher job figure as it realistically responds to the Government's ambitions for the region. It is considered that the proposals for Land to the North of A505, Duxford meet</p>	209702 (B Homent, J Tee and R Smith)

<p>the criteria set out in part 3 of the draft Policy J/NE. Therefore, the Site should be allocated to help meet this increased demand</p>	
<p>There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on sites 115388 and 115413. Given the Site's sustainable location on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and, in the case of site 115413, accommodate occupiers that may look to take up warehouse space across Greater Cambridge.</p>	<p>210434 (G Pritchard, Bidwells),</p>
<p>There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on this Site 115388. Given the Site's sustainable location on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and accommodate occupiers that may look to take up warehouse space across Greater Cambridge.</p>	<p>206050 (Hardwick Farming Company Limited)</p>
<p>Meldreth is also specifically mentioned in respect of the 'Eternit Site' as per policy J/NE - we agree. Local employment of all types is important for sustainable village life and we are happy with the continued use, and possible expansion of business activities on this existing brownfield site.</p>	<p>209135 (J Damant, Meldreth PC)</p>

<p>The Centre for Computing History (CCH) plays a crucial role in documenting Cambridge's technological contributions and houses significant collections that preserve both technological milestones and human stories. It attracts 22,000 visitors annually, including 7,500 young people, providing hands-on learning experiences that foster digital confidence and support the development of the future tech workforce.</p> <p>The centre offers volunteering opportunities, accessible programming for neurodivergent visitors, and serves as an informal and welcoming space for all ages to engage with technology. CCH contributes £410,019 to the local economy each year, highlighting its cultural and economic significance as a community museum.</p> <p>The current location on Coldhams Road limits CCH's offerings and is at risk due to potential EWR development, lacking necessary environmental controls and accessibility. CCH requires a new building in a more accessible location to expand educational programmes, enhance community engagement, and safeguard its collections for future generations.</p>	<p>202343 (L Salter, The Centre for Computing History)</p>
<p>Logistics sites should be sited as close as possible to residential centres to encourage walking or cycling. It seems that Slate Hall Farm/C25 can meet this requirement, although there are significant issues with other forms of traffic generated by this site. It is less clear that Jaynic's site is within reasonable active travel distance for existing or proposed housing sufficient for its needs. The Newlands site would seem to be too remote from centres of housing to result in a significant number of employees choosing active travel as a regular means of commuting. Noon Folly, or Tritax may provide more scope</p>	<p>202743, 206377 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211429 and 202478 (Boxworth Parish Meeting)</p>

<p>for active travel although this proposal suffers from other deficiencies referred to in the sections of this note covering traffic and size and scale of the development.</p>	
<p>Future developments should support future industries whilst maintaining the essential nature of a university city in a still, largely, rural setting. It would be inappropriate for scarce resources of land and water together with fragile flood management to be used to support logistics hubs where the primary focus is not on supporting the local economy.</p>	<p>202743, 206382 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211435 and 202478 (Boxworth Parish Meeting)</p>
<p>Cambridge is located in an environment where the land is flat and views are extensive. Such views need to be preserved. In this environment 'big boxes', with eaves heights of 24m, equivalent to a seven story building would be inappropriate. Neither Tritax and Newlands developments meet policy requirements nor the implied restrictions on the size and scale of rural developments. Any developments should be required to clearly demonstrate (including through 3D illustrations), at consultation phase, maximum size, including overall heights, of the buildings on developments and how through comprehensive landscaping their developments will not be visible beyond the site boundaries. Supported logistic/commercial developments on the A14 corridor should consist of small to medium size buildings. Eaves heights should be restricted and clearly set out; In this context 10/12 m would seem appropriate.</p>	<p>211114, 202743 and 202478 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211436 and 202478 (Boxworth Parish Meeting)</p>
<p>The Newlands development does not meet the policy requirements relating to providing support for Greater Cambridge nor the implied restrictions on the size and scale of rural developments.</p>	<p>202743 (N Turton, Boxworth Parish Meeting on behalf of the A14 Logistics Forum)</p>

	and 202748 (N Turton, Boxworth Parish Meeting)
The Tritax development does not meet the policy requirements relating to providing support for Greater Cambridge nor the implied restrictions on the size and scale of rural developments.	202743 (N Turton, Boxworth Parish Meeting on behalf of the A14 Logistics Forum)
It is noted that this policy does not include new employment developments as part of new / expanded settlements.	211557 (Martin Grand Land Limited)
Clearly, land, which is not within the Green Belt, is available, and being actively promoted by our client to deliver development that would go some way to meeting that strategic industrial /warehousing and logistics need, in a location, for which there is no demand for any other more prioritized or specialist sectors (by which we assume is referring to Life Sciences; R&D). To argue there is insufficient land to accommodate specialist sectors is wholly untrue.	211684 (Newlands Cambridge Limited)

Policy J/RE: Supporting the rural economy

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was concern from one respondent that there was insufficient focus on rural economies, their unique needs and the needs of rural businesses in the Job theme with the focus of opportunity on urban Cambridge potentially increasing commuting and weakening rural resilience. Another respondent was concerned that the policy should protect agricultural land, rural businesses, and water-dependent enterprises and that development should not undermine food production, water availability, or land management. A number of changes to the policy were requested to incorporate environmental criteria into the policy including carbon reductions, environmental improvements assessed over the life span of the project and accessible locations. There was objection to the policy due to concern that there was insufficient recognition of other land based rural businesses, with requests for a number of revisions to address the needs of equestrian and other specialist rural enterprises in the countryside. There were also specific requests to protect equestrian access by, for example, connecting up public bridleways and to support small holdings. Girton Parish Council recognised the importance of the rural economy, viewing sympathetic employment development within the village boundary positively but wishing to maintain a separation with urban employment typologies. Shelford Parish Council strongly agree with the policy but expressed concern that a proposed development within the parish is inconsistent with its rural setting.

Response to main issues raised in representations:

Comments on the policy are noted. The policy seeks to appropriately support the rural economy, reflecting the National Planning Policy Framework. A number of the comments raise issues already addressed by other policies, such as requirements regarding digital connectivity, sustainable transport opportunities, and building standards. The focus on clustering development around existing buildings is an appropriate policy requirement, protecting the character of the countryside. Some comments specifically reference equestrian businesses, but the proposed policy provides an appropriate framework consider proposals for these land bases businesses in combination with H/DC: Dwellings in the countryside.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Object selected	204005 (K Warth, KWA Architects), 208661 (L Warth, British Horse Society)
Girton's rural economy depends on landowner diversification, small-scale businesses, local services, and environmental stewardship. Rural development is essential for community resilience. Rural diversification consistent with village identity and landscape character should be supported. Local retail and small enterprises should meet real surveyed demand and the Plan should enable small-scale enterprises integrated with the Development Framework.	202245 (Y Girton PC)
The Plan should protect the Girton Gap and rural edges from urbanised employment types.	202245 (Girton PC)

<p>The Jobs theme is too heavily weighted to Cambridge based clusters and major employment centres. Limited reference to the specific needs of rural businesses such as farm diversification, small rural enterprises, home based businesses and workspace in villages risks concentrating opportunity in urban areas, longer commute with reduced jobs and weaker resilience in rural areas.</p>	<p>203128 (H Neal, Cambridgeshire ACRE)</p>
<p>Policies should more clearly address rural employment land, digital connectivity, transport access for workers and support for rural high streets and services.</p>	<p>203128 (H Neal, Cambridgeshire ACRE)</p>
<p>Replacement buildings should be permitted only where they deliver an overall carbon saving, including embodied emissions.</p>	<p>203725 (R Comins, Cambridge Green Party)</p>
<p>The policy should require environmental improvement to be assessed over the full lifespan of existing and proposed buildings, covering construction and operational emissions.</p>	<p>203725 (R Comins, Cambridge Green Party)</p>
<p>Wording should be strengthened so that developments generating significant employee or visitor numbers are located near larger settlements or are accessible by public transport, cycling and walking, rather than any single mode.</p>	<p>203725 (R Comins, Cambridge Green Party)</p>
<p>The Local Plan is overly restrictive and risks discouraging new rural enterprises from establishing in Cambridgeshire. Rural policy support is largely framed around agricultural operations, with insufficient recognition of other land based rural businesses. The Policy should be revised to explicitly recognise and support the development of equestrian and other specialist rural enterprises in the countryside.</p>	<p>204005 (K Warth, KWA Architects)</p>
<p>The policy should recognise that equestrian businesses require access to large areas of land, while the built footprint is often limited, and that development may need to be separated for health and safety or operational reasons.</p>	<p>204005 (K Warth, KWA Architects)</p>

<p>The policy should make clear that proposals necessary to establish or maintain the viability of rural businesses will be supported where landscape, environmental, and amenity impacts can be mitigated.</p>	<p>204005 (K Warth, KWA Architects)</p>
<p>The policy should clarify that development can occur in countryside and Green Belt locations where justified by operational need, in line with NPPF guidance.</p>	<p>204005 (K Warth, KWA Architects)</p>
<p>The policy should reflect the significant contribution of rural businesses, including equestrian enterprises, to employment, tourism, and the wider rural economy.</p>	<p>204005 (K Warth, KWA Architects)</p>
<p>The policy should avoid overly prescriptive requirements that are impractical for specialist rural uses, such as restricting car parking to within clusters of buildings.</p>	<p>204005 (K Warth, KWA Architects)</p>
<p>Existing structures are often unsuitable for modern equine operations. Limiting development to existing buildings risks undermining business viability and the wider rural economy. The policy should recognise that some businesses may require new buildings in the countryside and that the rural economy has the right to thrive with access to necessary facilities and amenities (even if new build) in the same way as urban economies.</p>	<p>204005 (K Warth, KWA Architects)</p>
<p>Providing better infrastructure to tempt and persuade people out of cars is a good idea. Equestrian provision should always be included in rural Active Travel schemes and not just "where appropriate". The current network is extremely disjointed and a minimal part of the Public Rights of Way network. This impacts on the safety of equestrians most of whom are women. Providing such give safe access to the countryside allows them to safely enjoy health and fitness. Cyclepaths and footpaths are joined up; Bridleways should be too.</p>	<p>204038 (S Rogers)</p>

<p>Equestrian activity is a vital and large part of the rural economy nationally and locally. Access to a safe and connected Rights of Way network is fundamental to the viability of businesses in this sector. BHS suggests that the plan should recognise the economic importance of the equestrian sector, the role of Rights of Way and multi-user routes in supporting rural livelihoods and the need to protect and enhance equestrian access as part of sustainable rural development.</p>	<p>204038 (S Rogers), 208661 (L Warth, British Horse Society - BHS)</p>
<p>The Plan should reference supporting small scale local agriculture, in particular smallholdings. These support sustainability and resilience in the food chain compared to large farms. It should actively encourage the creation of smallholdings with attached dwellings with an agricultural occupancy condition (which should not be allowed to end). The production of local food distributed via local farmers markets and Cambridge Market should be given a priority.</p>	<p>204673 (F Gawthrop)</p>
<p>We strongly agree with the policy including: not changing the character and impact; where there are no environmental improvements; not well-designed in form and bulk; not consistent in scale with its rural location; not located near to a settlement.</p>	<p>210950 (N Webster, Great Shelford PC)</p>
<p>In respect of change of use of the large barn at Shelford Bottom to be used as a Phlebotomy Centre, this proposed development is entirely inconsistent with its rural setting.</p>	<p>210950 (N Webster, Great Shelford PC)</p>
<p>Policy E/1 (Rural Economy) should protect agricultural land, rural businesses, and water-dependent enterprises. Development should not undermine food production, water availability, or land management.</p>	<p>208956 (CPRE Cambridgeshire and Peterborough)</p>

Policy J/AL: Protecting the best agricultural land

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was a mix of support for and objections to the policy. A number of objections from developers did not consider that the policy was consistent with the NPPF which, since 2024, has a greater emphasis on balancing the economic benefits of development with the loss of agricultural land, with agricultural land no longer explicitly protected. Given development pressures in Greater Cambridge this risks preventing sustainable, plan-led development regardless of wider benefits. There was also a respondent that considered that the approach taken was sufficiently balanced. Concern was also expressed over part b of the policy which was considered to require a sequential approach to development on agricultural land. This was considered to be too onerous and not supported by the NPPF. Suggested changes to the policy sought to ensure that it reflects the scale of any proposed loss, for example the use of the Natural England 20 ha threshold for consultation, and allows greater flexibility where alternative development delivers economic and other benefits. It was also requested that the policy acknowledge that land within agricultural designations may not be actively or viably farmed.

Support of the policy acknowledged the need to avoid the loss of agricultural land, its impacts on Priority Species and Habitats and its importance in food production, food security and equestrian activity. One responder stated that policy needed to be more stringent with a more precise mechanism to quantify benefits against the loss of agricultural land. There was concern from the CPCA and Stapleford and Great Shelford parish councils over the use of prime farmland for solar farms with suggestions that the

policy should seek to restrict them on the best and most versatile agricultural land. There were specific requests to specify whether both or just one of the criteria in part 1 needs to be met, to make links to other policies in the plan, such as Greenbelt Policy, to help safeguard land, to protect agricultural land around Girton and prioritise rural uses that prioritise landscape character. Positive support in the policy for urban/peri-urban food production was requested and local supply chains was requested. The RSPB requested reference to the Local Nature Recovery Strategy and local habitat map. Requests were made by Natural England around detailed land surveys and soil management.

Response to main issues raised in representations:

Representations received are noted. A number of comments seek greater protection, for example for food security reasons. Agricultural land is a valuable asset which should be appropriately weighted in planning decisions, but it must also be balanced against the need for other uses. Other representations seek to make the policy more flexible. National Planning Policy has consistently required local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land, and that 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. Part 1b of the policy reasonably requires evidence that the loss is justified and issues that should be considered. Weakening the policy, to exclude land not actively farmed for example, would not fully reflect the potential permanent loss of land that could go back into agricultural use. In identifying allocations in the local plan consideration has been given to opportunities to reuse brownfield land, and to the impact on agricultural land. Soil management issues have been addressed in Policy I/CM: Construction management.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	211558 (Martin Grant Land Limited)
Object selected	205448 (A Cannard, CPCA), 204597 (Redrow South Midlands), 204033 (K Warth, KWA Architects), 202561 (P Tribble), 204515 (Tritax Big Box Developments), 204288 and 204513 (Bellway Strategic Land)
Strongly/fully support the policy	201623 (J Flynn, Stapleford PC), 203555 (Ickleton PC)
There was a reiteration of the need for the plan to avoid the loss of high-quality farmland.	202246 (Y Murray, Girton PC)
It is unclear whether development needs to satisfy 1.a AND 1.b or 1.a OR 1.b.	202561 (P Tribble)
Food security is a major problem that is only going to get worse as a result of climate change, water scarcity, and geopolitics. The bar for development on the best agricultural land needs to be set higher, and needs a more precise mechanism to quantify benefits against the loss of agricultural land, otherwise it's ripe for abuse.	202561 (P Tribble)

<p>The NPPF recognises the importance of high quality agricultural land but no longer provides explicit protection.</p>	<p>204597 (Redrow South Midlands), 204033 (KWA Architects)</p>
<p>The policy is not consistent with the 2024 NPPF which now requires recognition of the economic value of best and most versatile agricultural land. It also fails to acknowledge that land within agricultural designations may not be actively or viably farmed. The policy should be revised to allow greater flexibility where alternative development delivers clear economic and rural benefits.</p> <p>Suggested wording:</p> <p>"Development proposals on land designated as the best and most versatile agricultural land will be supported where they demonstrate that:</p> <ul style="list-style-type: none"> (a) the land is not actively or viably farmed; and/or (b) the proposed development delivers clear economic, employment, or wider rural benefits; and (c) any impacts on soil quality, landscape character, and the wider rural environment can be appropriately mitigated." 	<p>204033 (K Warth, KWA Architects)</p>
<p>Land in the Greater Cambridge area is subject to significant development pressure, and lower-grade agricultural land may not be available, deliverable or sustainable due to ownership constraints, infrastructure capacity, access limitations, environmental designations or competing development needs. In this context, the policy risks preventing sustainable, plan-led development regardless of wider benefits. This is inconsistent with national policy, which requires impacts on agricultural land to be balanced.</p>	<p>204515 (Tritax Big Box Developments)</p>

<p>Part (b) of the policy implies a sequential approach to development where it should be demonstrated that lower quality land has been considered first. This approach is:</p> <ul style="list-style-type: none"> • Not supported by national guidance which states that where significant development of agricultural land is necessary, areas of poorer quality land should be preferred, rather than requiring proof that no alternative location exists. • Unnecessarily onerous and places a potentially unrealistic evidential burden on applicants. <p>A justification for the loss of agricultural land will have already been considered through the first part of the policy. The policy should be amended to align with national policy.</p>	<p>204597 (Redrow South Midlands), 204515 (Tritax Big Box Developments), 204288 and 204513 (Bellway Strategic Land)</p>
<p>Where the loss of BMV agricultural land is limited in extent and outweighed by the benefits of development the policy should allow for a balanced and proportionate assessment rather than operating as an absolute constraint. The Natural England Guide 20 ha threshold for consultation with Natural England provides a clear indication of the scale at which the loss of high quality agricultural land is considered significant in planning terms. Accordingly, the application of the policy should reflect both the scale of any proposed loss and the wider planning balance, including housing need, sustainability, deliverability and the availability of alternative sites.</p>	<p>204881 (S Boyd, Vistry Group), 210258, 210259 and 210260 (Vistry Group)</p>
<p>Support consideration of impacts on Priority Species and Habitats. Reference should be made to the Local Nature Recovery Strategy and local habitat map.</p>	<p>201468 (D Pullan, RSPB)</p>
<p>Agricultural land is vital with set aside schemes providing much needed permissive horseriding routes linking villages and places. Farms provide livery yards to keep horses at.</p>	<p>204036 (S Rogers)</p>
<p>Great Shelford Parish Council's development framework is surrounded by high quality farmland (Grade 2). As such, the strongly support this policy.</p>	<p>210951 (N Webster, Greater Shelford PC)</p>

<p>Concern over the use of prime farmland for solar farms. Potential solutions:</p> <ul style="list-style-type: none"> • Policy should state that the best agricultural land should not be used for solar farms and/or an explicit link to CC/RE: Renewable energy projects and Infrastructure. • Alter policy to apply the 'permanent loss' test to significant-scale solar farms on the highest grades of agricultural land. 	<p>201623 (J Flynn, Stapleford PC), 205448 (A Cannard, CPCA), 210951 (N Webster, Greater Shelford PC)</p>
<p>Much of the higher quality farmland in S Cambs is also Green Belt land. It would be helpful to link Policy J/AL to Green Belt policy, either explicitly in policy wording or in the supporting text, as a double safeguard of the best agricultural land.</p>	<p>201623 (J Flynn, Stapleford PC), 210951 (N Webster, Greater Shelford PC)</p>
<p>Advise adding to this Policy the requirement for detailed Agricultural Land Classification (ALC) surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would also be welcomed.</p>	<p>207636 (C Duerden, Natural England)</p>
<p>The authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable or sufficiently detailed information is available, it would be reasonable to expect developers to commission a new ALC survey, for any sites they wish to put forward for development.</p>	<p>207637 (C Duerden, Natural England)</p>
<p>To assist in understanding agricultural land quality within the plan area and to safeguard Best and Most Versatile agricultural land in line with the NPPF, strategic scale ALC Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally by contacting Natural England. Some of this data is also available on the magic website.</p>	<p>207637 (C Duerden, Natural England)</p>

<p>A requirement for soil handling and sustainable soil management strategies is advised. This should be based on a detailed assessment of the soil resource following best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning. This would help to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would also be welcomed. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice. The planning authority should ensure that sufficient site-specific soil survey data is available to inform decision making. To include, for example, assessment of suitability of soil properties for type of landscaping and planting proposed to inform beneficial re-use, appropriate soil management, and drainage, where required.</p>	<p>207638 (C Duerden, Natural England)</p>
<p>Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The Code should be referred to where relevant in the development plan.</p>	<p>207639 (C Duerden, Natural England)</p>
<p>Rural uses that prioritise landscape character should be prioritised and agricultural land around the Girton Gap should be protected.</p>	<p>202246 (Y Murray, Girton PC)</p>
<p>Agricultural land of top quality should be used for food production (regeneratively) not housing, + solar farms should be on warehouse roofs and car parks, not on this land.</p>	<p>209677 (H Hale)</p>

Support the protection of the best and most versatile agricultural land (Grades 1-3a).	208189 (Cambridge Sustainable Food), 206959 (Y Dignon)
Recommend adding positive support for urban/ peri-urban food production and local supply chains, including: supporting appropriate farm diversification that strengthens local food supply (e.g., small-scale processing, storage, distribution, farm shops and community-supported agriculture models), where impacts are well managed; identifying opportunities for community food growing at scale (where suitable) as part of resilience planning; and ensuring employment and rural diversification approaches recognise food as a strategic sector, not just “countryside uses.”	208194 (Cambridge Sustainable Food), 206964 (Y Dignon)
Supports the principle of protecting the best and most versatile agricultural land and recognises the importance of safeguarding Grades 1, 2 and 3a land where reasonable alternatives exist. Policy sets out in criterion (b) that the protection of agricultural land must be balanced against wider sustainability considerations and demonstrable development needs. This planning balance strand is supported and consistent with national policy, which requires decision-makers to take a proportionate and pragmatic approach where the benefits of development clearly outweigh the loss of agricultural land and where there are no suitable or available lower-grade development.	207035 (Mac Mic Land)
Agricultural land is vital with set aside schemes providing much needed permissive horseriding routes linking villages and places. Farms provide livery yards to keep horses at.	204041 (S Rogers)
Support reference to policy wording accepting loss of Grades 1, 2 or 3a agricultural land where the land is allocated for development in the Local Plan.	211558 (Martin Grant Land Limited)

Policy J/PB: Protecting existing business space

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The objection to this policy considered that it did not recognise current office market trends and would prevent the effective reuse of underutilised brownfield sites. It was also considered to be overly restrictive and inconsistent with Government policy around permitted development rights. It was requested that the policy adopt a more flexible approach by removing the 12-month marketing or vacancy requirement where office-to-residential conversion is proposed and support office to residential conversions. Parish councils focused on the need to protect and promote small business space in villages and the risk to jobs in schools, shops or pubs without further opportunities for new housing in villages. Histon Parish Council asked that Neighbourhood Plan policy on the Hain Daniels site be respected. The omission of Linton Industrial Estate was questioned. Suggestions for changes included expanding the range of meanwhile uses supported by the policy and adding a biodiversity net gain element. The opportunity for active travel that rural business units provide was recognised. Anglian Water Services highlighted the impact the increase in capacity at Cambridge Waste Water Recycling Centre may have on the identification of Strategic Industrial Estates, or other employment opportunities in North East Cambridge.

Response to main issues raised in representations:

Representations received are noted. As set out in the Jobs Topic Paper, employment sites and business premises in Greater Cambridge are under pressure for redevelopment from residential and other uses. 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 protection requirements, including the length of the marketing period, strike the right balance of protecting sites whilst not unreasonably applying longer term restrictions. It is acknowledged that changes to class E mean that some changes of use can take place without planning permission, and the policy can only apply where permission is required. Similar policies have been found sound in the adopted 2018 local plans. Minor changes have been proposed to the policy to expand the potential range of meanwhile uses. Policy S/PALN: South of A1307, Linton seeks to prevent windfall residential development in a defined area south of the A1307 other than improvements to existing properties. This is carried forward from the 2018 South Cambridgeshire Local Plan. Some representations seek to address issues which are already addressed in other policies, but the plan should be read as a whole.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Object selected	204024 (K Warth, KWA Architects)
Site 5g. Hain Daniels Site is covered by priority HIM08 in the Histon and Impington Neighbourhood Plan 2020 – 2031. A reference to all the points made in the Neighbourhood plan are to be respected.	201439 (S Jocelyn, Histon & Impington PC)
Girton needs to retain its limited local business space, as these support essential local services and small-scale employment. The Local Plan should protect existing village-scale employment sites and resist change-of-use to housing unless community benefit is proven.	202247 (Y Murray, Girton PC)

<p>The Local Plan should support small enterprises as core to the Development Framework. New business space should favour small, flexible formats.</p>	<p>202247 (Y Murray, Girton PC)</p>
<p>Anglian Water notes Policy J/PB seeks to retain existing employment sites and premises, and any loss would only be permitted where the site is allocated for an alternative use in the Local Plan (or a Neighbourhood Plan). As previously referenced, one of the current key priorities for Anglian Water to facilitate sustainable growth is to bring forward a phased scheme to increase the capacity to treat wastewater at our existing Cambridge WRC site, following the withdrawal of government funding to relocate the works to the north of the A14 under the CWWTPR DCO.</p> <p>We recognise that this will have implications for the current North East Cambridge site allocation, and this will have a bearing on future policy direction in the emerging Local Plan, potentially including the identification of Strategic Industrial Estates, or other employment opportunities within the North East Cambridge area defined by Policy J/NE.</p>	<p>210215 (T Saunders, Anglian Water Services)</p>
<p>Without meaningful opportunities for further housing, rural jobs are at risk. Declining and/or aging populations do not provide sufficient inhabitants to keep schools, shops or pubs running without patronage from outside. To hold on to a successful school and pub without encouraging too much car traffic there is a need to ensure the local population does not decrease.</p>	<p>203052 (H Livermore, Little Wilbraham and Six Mile Bottom PC)</p>
<p>The following should be added to the end of part 1c of the policy: “(in this scenario biodiversity net gain should be evidenced in any application),” to ensure environmental improvements accompany redevelopment.</p>	<p>203727 (R Comins, Cambridge Green Party)</p>

<p>Part 6 of the policy should be altered to read ““6. Meanwhile uses that generate employment opportunities, community benefit, increased biodiversity or food sustainability will be encouraged while the marketing of a vacant site takes place.”</p>	<p>203727 (R Comins, Cambridge Green Party)</p>
<p>Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages.</p>	<p>204042 (S Rogers)</p>
<p>The policy should adopt a more flexible approach by removing the 12-month marketing or vacancy requirement where office-to-residential conversion is proposed as:</p> <ul style="list-style-type: none"> • The Policy does not reflect post-Covid changes in office use. Demand for traditional office space has reduced. Requiring the demonstration of 12 months’ vacancy risks preventing the effective reuse of underutilised brownfield sites for much-needed housing. • The Policy is overly restrictive and inconsistent with national policy. Permitted development rights under Class MA allow office-to-residential conversion without the need to demonstrate 12 months’ vacancy. <p>The policy should supporting the conversion of office buildings to residential use where they comply with relevant design, amenity, and environmental requirements. It should also explicitly recognise the contribution of such conversions to housing delivery and the efficient use of land.</p>	<p>204024 (K Warth, KWA Architects)</p>
<p>The policy J/PB appropriately supports the vibrancy of local communities provided by employment sites. The list does not appear to include the Linton Industrial Estate south of Cambridge Road allocated on the village map and in previous Local Plans but it is unclear whether that is because it is an error or whether the list refers only to sites where a change to Mid-tech would be appropriate. It should be clarified.</p>	<p>211917 (C Newell)</p>

Policy J/AW: Affordable workspaces and creative industries

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Concerns were expressed that there was insufficient information on the policy parameters e.g. thresholds levels, to be able to comment on the policy. If left undefined, this would cause uncertainty for applicants and investors contrary to the NPPF. It was suggested that the lack of definition of affordable workspace could lead to inconsistencies in the implementation of the policy however it was also suggested that inflexibility caused by requirements would not enable it to meet local needs and would challenge deliverability and viability, deterring investment. A suggested alternative would be for the policy to explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. There was concern that there was insufficient (non-London) up-to-date evidence to support the policy and that policy requirements had not been viability tested, risking embedding requirements not yet demonstrated to be viable or deliverable. The impact of the policy (including alongside other plan requirements) on viability, was a key concern for respondents particularly for those schemes already facing viability constraints; it would stymie growth generally. It was requested that a viability clause be added and clarity provided on how competing objectives are prioritised which viability is threatened. General objections to the policy from developers concerned the fact that it was not justified by or consistent with national planning policy.

There were objections from developers over how the timescale requirement for the implementation would impact on scheme delivery and viability. There was a request for flexibility for developers and/or occupiers to be given an appropriate degree of control

over the delivery of affordable workspace on-site so that it is contextual and reasonable. Clarity was requested on how an owner would demonstrate competence to deliver affordable workspace. Specific concerns were raised that it would not be appropriate for small scale affordable workspace to be required on sites with large scale logistics sheds.

There was support for allowing affordable workspace to be provided off-site. Cambridge Science Park was cited as an example where provision on alternative parcels within the Park might be a better option. It was highlighted that affordable workspace can come in many forms. A large number of respondents supported Create Cambridge's asks to clearly distinguish cultural production space, ensure that is affordable, prioritised over generic co-working space with a minimum requirement. There was a request for affordable workspace to be located in villages. Respondents who supported Elizabeth Way bridge and Underpass(es) cultural hub / Community project:

It was requested that the affordable workspace should be of an equivalent quality to the other space and that science and technology developments should make provision for general employment, arts and creative spaces to increase the economic resilience of the economy.

[Response to main issues raised in representations:](#)

Representations questioning whether the parameters of the policy were clear enough received are noted. Ahead of Proposed Submission the Councils commissioned a study to further explore the case for requiring affordable employment space, the appropriate way it should be applied, and to test viability. The evidence demonstrates that a policy for Greater Cambridge is justified by local circumstances, and recommends specific parameters and implementation approaches. Informed by the study, the policy in the Proposed Submission Plan sets clear parameters to enable it to be effectively implemented.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	201862 and 204676 B Lenz, NEUBAU Architecture), 203061 K Porrer, Cambridge City Council Liberal Democrat Group), 204247 and 204695 (A Giarlis), 204610, 204624, 204633 (T Woodcock), 204940 (M Cleminson), 205087 (C Sharman), 205206 (M Burman, Cambridge Junction/Create Cambridge), 205266 (R Good), 205453 (B Smith), 211491 (Trinity College, Cambridge)
Object selected	204528 (Tritax Big Box Developments) 204466 (The

	Royal London Mutual Insurance Society Ltd), 204230 (Railpen), 205043 (Abbey Properties Cambridgeshire Limited), 203449 (Babraham Research Campus), 207451 (Pioneer Group Ltd)
The policy is not considered to be justified or consistent with national planning policy as there is no requirement in the NPPF to deliver affordable workspace. The policy is not justified and does not propose any threshold for where affordable workspace would be required to be delivered. Any threshold would require consideration in terms of practical considerations and viability.	205043 (A Brand, Abbey Properties Cambridgeshire Limited)
Fully support affordable spaces to work.	205453 (B Smith)
The inflexibility of the policy contradicts part 1 of the policy that affordable workspace should meet an identified needs therefore the policy is unsound.	204466 (The Royal London Mutual Insurance Society Ltd)
On sites with large/strategic logistic sheds, providing an affordable provision on the Site is not considered to be appropriate (for start-ups) or feasible. It will conflict with national priorities for making an effective use of land.	204528 (Tritax Big Box Developments)

<p>Large-format employment and logistics developments are typically designed for single occupiers and are not compatible with subdivided, small-scale units. Requiring on-site affordable workspace risks constraining efficient site layout and undermining economic viability.</p>	
<p>The requirement for affordable workspace to be made available for occupation at, or prior to, the first occupation of 50 per cent of the non-affordable economic floorspace:</p> <ul style="list-style-type: none"> • Introduces a delivery risk. This would be ahead of the point at which sufficient market floorspace has been occupied to support scheme cashflow. • For large and complex commercial developments, the front-loading of non-market floorspace has the potential to undermine development viability and delay delivery, contrary to the National Planning Policy Framework (December 2024), which requires plan policies to be supportive of economic growth. • Start-up business in the science and technology market prefer to co-locate close to established, more mature, businesses so that they can fully take advantage of the clustering benefits which can in turn drive innovation. Part 4, as drafted, therefore may not properly reflect market signals and again may hinder quick delivery of floorspace within the early parts of the plan period. 	<p>204466 (The Royal London Mutual Insurance Society Ltd), 204230 (Railpen), 204047 (Mission Street & BGO Propco Newton Ltd)</p>
<p>A requirement for a prescriptive percentage provision of affordable workspace over a fixed period, or in perpetuity is inflexible and will challenge the deliverability and viability of some commercial development. Development won't be able to respond to market signals in an effective way. It creates uncertainty, deterring investment.</p>	<p>204466 (The Royal London Mutual Insurance Society Ltd), 204230 (Railpen)</p>
<p>The policy does not define the floorspace thresholds, the percentage of affordable workspace to be delivered, the level or duration of rental discounts and does not have a proper definition of 'affordable' workspace. In its current form it is not possible to provide comprehensive comments on the policy</p>	<p>204528 (Tritax Big Box Developments), 204094 (Brookgate Land Ltd and Network Rail Infrastructure</p>

<p>wording. Further clarity is needed on the types of development which will trigger Policy J/AW.</p> <p>Comments included:</p> <ul style="list-style-type: none"> • These matters are fundamental to assessing development feasibility. • The absence of this information creates significant uncertainty for applicants and investors, which is inconsistent with the NPPF requirement for planning policies to be clear, unambiguous and supportive of growth (para 16d). • Support the overarching objective but it currently lack clarity. • It is acknowledged that a number of affordable workspace policies exist in London where land values and construction costs are high making the delivery more feasible. However, even in these circumstances, scheme viability is greatly compromised. 	<p>Ltd), 204230 (Railpen), 203090 (Trinity College, Cambridge), 203449 (Babraham Research Campus)</p>
<p>Should the Council intend for affordable workspace to be delivered as part of larger commercial developments, it is considered necessary for the policy to clearly define both the minimum size of development to which the requirement applies and the percentage of floorspace to be allocated. Alternatively, if the Council does not wish to prescribe specific thresholds or figures, the policy should explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. This approach should be set out within the policy wording itself, rather than relying on supporting text or supplementary information.</p>	<p>203090 (Trinity College, Cambridge)</p>
<p>Support the inclusion of flexibility to allow affordable workspace requirements to be met off-site in exceptional circumstances. These circumstances may include, but are not limited to, developments where an occupier requires exclusive use of a single office building, or where mixed-use sites comprise multiple landownerships that make on-site provision impractical.</p>	<p>203090, 211491 (Trinity College, Cambridge)</p>

<p>The term 'affordable' lacks proper definition, affordability might mean different things in different contexts, leading to inconsistencies in how the policy is applied.</p>	<p>204230 (Railpen)</p>
<p>Policy J/AW should retain flexibility for bespoke solutions such as incubator hubs.</p>	<p>209039 (Marshall Group Properties)</p>
<p>The NPPF is explicit that policies should be underpinned by proportionate, up-to-date evidence (para 32) and that policy requirements should be tested through plan-wide viability assessment. Introducing a policy of this nature before the completion of the required work risks embedding requirements that have not been demonstrated to be viable or deliverable. Policy is not considered to be justified or consistent with national planning policy as there is no requirement in the NPPF to deliver affordable workspace. The policy is not justified and does not propose any threshold for where affordable workspace would be required to be delivered. Any threshold would require consideration in terms of practical considerations and viability.</p>	<p>204230 (Railpen), 205043 (Abbey Properties Cambridgeshire Limited)</p>
<p>The cumulative effect of uncertainty around thresholds, rental levels, delivery timing and management requirements risks placing a disproportionate burden on development at a time when viability is already a limiting factor for schemes due to interest rates, inflation and material costs. This may result in reductions to contributions elsewhere. Paragraph 35 of the NPPF makes clear that the cumulative impact of policy requirements should not undermine the deliverability of the Plan. In its current form, Policy J/AW coupled with other obligations fails to meet this test and risks discouraging investment, delaying delivery and reducing the overall quantum of employment floorspace that can be brought forward. This is particularly worrying as Cambridge is reliant on a small number of large sites, which if not brought forward will mean that development will need to be sought from elsewhere.</p>	<p>204230 (Railpen)</p>

<p>London should not be used as a benchmark for provision. It is a very different market in terms of economic conditions/market values and the scale of units that may be delivered.</p>	<p>204528 (Tritax Big Box Developments)</p>
<p>While the principle is to be supported the policy is still subject to full justification. However, in London, affordable workspace policies don't work and usually the evidence base doesn't justify them on viability grounds. If this policy is to evolve it must set out clear and realistic targets based on Cambridge evidence and include 'subject to viability' within any policy to allow for market variations throughout the plan period.</p>	<p>202499 (M Parsons, University of Cambridge)</p>
<p>The need for, and form of, affordable workspace provision should be considered on a case-by-case basis, informed by site characteristics, intended occupiers, operational requirements and local evidence of demand, with flexibility to allow alternative approaches where on-site provision would be impractical or ineffective.</p>	<p>204528 (Tritax Big Box Developments)</p>
<p>Strongly support proposals that prioritise the provision of affordable workspaces for the creative industries in Cambridge. Cambridge's success as a centre for innovation depends not only on science and technology, but also on its creative sector: artists, designers, makers, illustrators, musicians and cultural producers who contribute to the city's identity, economy and quality of life. However, rising property costs have made it increasingly difficult for creatives to find and retain suitable, affordable places to work.</p>	<p>205087 (C Sharman)</p>
<p>An affordable workspace policy is not considered to be necessary or appropriate in the industrial and warehouse sectors, having regard to the economic needs, market demand and signals in these sectors, or indeed for any other reason.</p>	<p>205145 (Lolworth Developments Limited)</p>

<p>The requirement for affordable workspace may significantly affect development viability for schemes that are already facing significant pressures. In the absence of detailed viability testing, and appropriate flexibility within the policy to account for unknown viability pressures, it is considered that the policy conflicts with requirements of the NPPF. If the policy is carried forward, a viability clause should be added in. This could allow for negotiated contributions and provide justification for alternative delivery mechanisms as outlined in the draft policy.</p>	<p>207451 (Pioneer Group Ltd)</p>
<p>We support this policy which will support smaller businesses and community organisations to succeed in Cambridge, where rents can be expensive.</p>	<p>203061 K Porrer, Cambridge City Council Liberal Democrat Group)</p>
<p>Support clause 1a - level of affordable workspaces provided: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub / Community project. Support the Community Group running this project in place of a commercial developer, with council rents affordable enough to offset the initial investment. A viability and operational business plan will help understand the level of affordable workspaces supplied, % will depend on market demand for affordable creative / commercial programmes. Support market discounts applied to a Community-led development located within the Eastern Gate improvement area, surrounded by high cost areas.</p>	<p>201862, 204341 B Lenz, NEUBAU Architecture), 204610, 204624, 204633 (T Woodcock), 204940 (M Cleminson), 205206 (M Burman, Cambridge Junction/Create Cambridge), 205325 (Z Svendsen, University of Cambridge)</p>
<p>With reference to with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub / Community project:</p>	<p>204247 (A Giarlis), 201862 B Lenz, NEUBAU Architecture), 204610,</p>

<ul style="list-style-type: none"> • Support clause 1a - level of affordable workspaces provided: support affordable workspaces and facilities management using a third-party organisation, if so required. Promote continued involvement of a Community Group with charitable interest, rather than a commercial developer, to ensure maximum impact on sustainable, affordable and social goals through planning stages, build and operations. • SUPPORT Community Access to public funding and S106: a community led project with charitable interest and %affordable provisions for local SMEs should be made eligible for funding or match funding via S106 or similar, enabling planning and construction phases and with pragmatic, sustainable goals and management to ensure financial profitability and returns in the operational phase. • SUPPORT Affordability of workspaces for the creative industry: Affordability and access to low-cost high social impact shared spaces are key concerns for smaller creative businesses and start ups who require networking and interaction to promote their business. A Community-run group with charitable interest has the advantage of not being subject to financial fluctuations and market demands as would be the case under commercial ownership, inevitably causing the project to 'gentrify' and draw creatives away from city centre location. An affordable cultural hub could potentially offset rents with other community and commercial leaseholders integrated, to ensure community agenda but maintain financial profitability to ensure continued operations. Other affordable measures might include hot desking, shared workspaces and/or membership schemes to facilitate low entry thresholds for local creatives, artists and craftspeople, individuals and businesses. 	<p>204624, 204633 (T Woodcock), 204940 (M Cleminson)</p>
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<ul style="list-style-type: none"> SUPPORT Community Access to public funding and S106: a community led project with charitable interest and %affordable provisions for local SMEs should be made eligible for funding or match funding via S106 or similar, enabling planning and construction phases and with pragmatic, sustainable goals and management to ensure financial profitability and returns in the operational phase. 	205335 (Z Svendsen, University of Cambridge)
Support the proposal to transform Elizabeth Way bridge area into a cultural hub.	205266 (R Good)
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages	204044 (S Rogers)
<p>Affordable workspace and community-scale creative enterprise align with Girton's economy and support residents who seek local, flexible work.</p> <ul style="list-style-type: none"> The plan should provide affordable, flexible workspaces suitable for small businesses and creatives. Residents support small enterprise and flexible workspace. The plan should locate affordable workspace within the village, not in remote employment areas, and design workspace that respects rural scale and character. Community-scale creative industries fit village character. Affordable units reduce commuting and strengthen local resilience. 	202248 (Y Murray, Girton PC)
Would like to see explicit inclusion of artist studios and art spaces.	202809 (H Cook)
<p>Support Cambridge Junction and Create Cambridge in ask that:</p> <ul style="list-style-type: none"> “Affordable Office Space” is clearly distinguished from “Cultural Production Space” genuinely affordable cultural production space is required (e.g. peppercorn, with rental charges well-below market rates and established based on evidence, ie Wysing Arts Centre's research on affordable 	203625 (Z Svendsen, University of Cambridge), 203848 (N Yeni), 203866 (J Fritsch, University of

<p>artist studios)</p> <ul style="list-style-type: none"> • rehearsal, making and sole-use studios are prioritised over generic co-working • a minimum requirement (e.g., 10% in schemes over 1,000 sqm) is introduced. This safeguards usable creative space from being diluted. 	<p>Cambridge), 204159 and 204162 (M Burman, Cambridge Junction/Create Cambridge), 204394 (L Elmer, New International Encounter), 204676 NEUBAU Architecture Ltd, 204695 (A Giarlis), 204984 (R Cooper, Wysing Arts Centre), 205030 (L Sheerman, University of Cambridge), 205049 (H Paterson), 205123 (J Walsh), 205282 (AC de Azevedo Lamha), 205298 (N Oakley), 205316 (L Howse), 205364 (A Seiglow), 205390 (E Hine, Cambridge Junction/Create Cambridge), 202053, 202054 (H Chamberlain), 202138 (M</p>
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Ridler, Cambridge Junction),
202196 (H Tam), 202302 (L
Mills, Cambridge Junction),
202310 (S Yusuf, Cambridge
Junction/Create Cambridge),
202383 (J Webber), 202404
(S Biller, Kettle's Yard),
202407 (T Shaw), 202458 (K
Jones), 202683 (T Altmann),
202713 (W Townsend),
202751 (C Woods,
Cambridge Junction/Create
Cambridge), 202779 (S
Lee), 202865 (R Tinkler,
Cambridge Junction),
202868 (B Groisman,
Cambridge Junction),
202925 (R Tarry), 202977 (T
Flinders), V Beechey,
203017 (The Arts Theatre
Cambridge), 203330 (N

	Ellis), 203430 (S Ashworth), 203489 (L Heap), 203508 (D Lever)
It is crucial that sustainability is embedded into all aspects of the local plan in the light of ongoing climate breakdown. Therefore, the key strategic priority should be amended to read “Encourage a sustainable and successful mixed economy in Greater Cambridge within ecological limits which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation.”	203723 (R Comins, Cambridge Green Party)
“7. Affordable workspace within a development should not be inferior in terms of location, exposure to noise or other pollution, facilities, light availability, bicycle and vehicular parking, as compared to the non-affordable workspace.” should be added.	203729 (R Comins, Cambridge Green Party)
The cumulative impact of Local Plan requirements on viability and delivery is a concern. There is a need to recognise the cumulative effect of multiple policy requirements which can place significant pressure on scheme viability. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.	203531 (E Pritchard, Cambridge Ahead)
All sci-tech developments should make provision for general employment spaces and also for arts and creative spaces given the lack of provision and the significant economic and social risks of building an	203811 (A Carpen)

economy based on a narrow economic base. This will increase the economic resilience of the Cambridge economy.	
Several science and technology schemes in the local area appear to have stalled and simply are not being delivered at the required rate. Many of these projects will cite development viability as the core reason for this. As such, a mandatory policy requirement to deliver affordable workspace is likely to put added strain on viability and ultimately stymie delivery.	204047 (Mission Street & BGO Propco Newton Ltd)
The application of a flat rate proportion of 10-20% of permitted floorspace is inflexible and would contradict with part 1 of the policy which requires affordable workspace to meet a local identified need. In that sense, there is a risk the policy will be found to be unsound.	204047 (Mission Street & BGO Propco Newton Ltd)
Object to the proposed wording of Policy J/AW. The requirement for affordable workspace would significantly affect scheme viability for schemes that are already facing viability constraints. In light of the requirement for thousands of new jobs in Greater Cambridge, this would severely impact the number of schemes coming forward to deliver this level of growth.	203449 (Babraham Research Campus)
The policy allows affordable workspace to be managed and operated by the owner where they can demonstrate the necessary skills and experience. Given the absence of existing guidance, it should be clarified how an owner would demonstrate competence to deliver affordable workspace effectively.	203449 (Babraham Research Campus)
Affordability also comes in many forms. For example, at Babraham Research Campus they have a 'Live Labs' scheme whereby new start-ups rent bench space and desk space underpinned by the support services running that facility. The company/individual enters into a facility agreement to use the	203449 (Babraham Research Campus)

<p>space. For start-ups in other buildings, they benefit from more flexible lease terms (shorter leases and break terms).</p>	
<p>There is an imperative that a viability clause is added in to the policy wording. This could allow for negotiated contributions and provide justification for the alternative delivery mechanisms outlined in the policy such as off-site provision, or financial payments where on-site affordable workspace is not feasible.</p>	<p>204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 203449 (Babraham Research Campus)</p>
<p>The policy should be drafted to allow developers and/or occupiers an appropriate degree of control over the delivery of affordable workspace on-site. This should allow for flexibility on the location of affordable workspace within the development, duration of occupation and form of affordable workspace. A prescriptive approach where the Council are gifted control of affordable workspace would likely lead to incompatible development. A more flexible approach however, would allow for affordable workspace to be contextual and reasonable, so as to not undermine the developers' wider ambition.</p>	<p>204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>Clarity is requested on how an owner would demonstrate competence to deliver affordable workspace effectively</p>	<p>204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>Cambridge Science Park already provides a broad and established range of workspace typologies, supporting businesses at all stages of growth, from early-stage start-ups and incubator space, through grow-on and scale-up accommodation, to bespoke headquarters buildings for established companies. In this context, the ability to meet affordable workspace requirements flexibly across the wider Cambridge Science Park estate, rather than within each individual development parcel, is supported.</p>	<p>203090 (Trinity College, Cambridge)</p>

<p>This would allow affordable workspace provision to be aligned more effectively with the operational needs of occupiers and the evolving lifecycle of businesses, while still contributing to the overall supply of affordable workspace across the site.</p>	
<p>Support in principle. It is noted that the Local Plan states that “The Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. We would welcome feedback on the approach through this consultation.” It is important that this detail is carefully considered and viability tested, and that stakeholders have further opportunity to consider these details before these matters are concluded.</p>	<p>211559 (Martin Grant Land Limited)</p>

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

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy suggesting the balance between ancillary/complementary uses and employment uses was appropriate and citing the alignment of the policy with national policy and good use of these facilities on Cambridge Science Park. Caveats included that facilities need to be appropriate, viable and assessed on a site-by-site basis. The potential benefits highlighted included: creating a stronger sense of place; enhancing employee wellbeing; and reducing off-site travel. One respondent suggested that the policy could help develop the local bridleway network. Concerns included the impacts of employment parks on village-scale employment and a request to support small village facilities. Two developments were highlighted as delivering the types of facilities highlighted in the policy.

Response to main issues raised in representations:

Representations are noted. The need for appropriate supporting facilities to support employment park has been a theme in our employment space, and a number of comments support that principle. The policy acknowledges the need to also consider the impact on nearby centres, which was also raised as a concern.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support selected, including where appropriate and viable and where the type and amount of space is assessed on site-by-site basis. Reasons for support:</p> <ul style="list-style-type: none"> • Strikes an appropriate balance by ensuring such uses remain ancillary or complementary to existing or proposed employment uses. • Aligns with national policy, particularly paragraph 85 of the NPPF (2024), promoting conditions for business investment and expansion. The policy is deemed positively prepared, justified, and effective as per paragraph 36 of the NPPF 2024. • These facilities at Cambridge Science Park are widely used and contribute positively to the day-to-functioning and attractiveness of the Park for both occupiers and visitors. 	<p>204533 (Tritax Big Box Developments), 204471 (The Royal London Mutual Insurance Society Ltd), 203093 (Trinity College, Cambridge), 202501 (M Parsons, University of Cambridge), 211560 (Martin Grant Land Limited)</p>
<p>Employment parks nearby can overshadow local needs. The policy should ensure that employment-park policies do not divert investment away from village-scale employment. Local enterprise requires modest, accessible facilities.</p>	<p>202249 (Y Murray, Girton PC)</p>
<p>The policy should provide support for small business facilities within Girton itself to reduce commuting pressure and recognise the village’s rural context in any employment park policy application.</p>	<p>202249 (Y Murray, Girton PC)</p>
<p>A new recommended policy point: “3. Facilities will be particularly supported when they contribute to sustainability, for example through reuse schemes, recycling facilities, encourage active transport and reducing food waste.”</p>	<p>203731 (R Comins, Cambridge Green Party)</p>

<p>Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages. Providing better infrastructure to tempt and persuade people out of cars is a good idea. Equestrian provision should always be included in rural Active Travel schemes and not just "where appropriate". The current network is extremely disjointed and a minimal part of the Public Rights of Way network. This impacts on the safety of equestrians most of whom are women. Providing such give safe access to the countryside allows them to safely enjoy health and fitness. Cyclepaths and footpaths are joined up; Bridleways should be too.</p>	<p>204045 (S Rogers)</p>
<p>Meaningful and facilities on employment facilities deliver benefits. These include:</p> <ul style="list-style-type: none"> • Creating a stronger sense of place • Enhancing employee wellbeing • Reducing off-site travel 	<p>204533 (Tritax Big Box Developments), 204471 (The Royal London Mutual Insurance Society Ltd)</p>
<p>I have been told you have no cafe facilities at Cambridge Science Park? If so, why not? When I worked there, my employer provided free chocolate, and we all ate that at lunchtime, obviously a very bad idea.</p>	<p>201255 (S Williams)</p>
<p>The emerging masterplan for Cambridge Science Park seeks to build upon this strong existing provision through the introduction of additional services and facilities designed to further support the employment function of the site. These include enhanced indoor and outdoor social and collaboration spaces, leisure and wellbeing facilities, and improved green and public realm spaces. Collectively, these measures will help reinforce Cambridge Science Park as a high-quality, sustainable employment location capable of supporting future growth and development.</p>	<p>203093 (Trinity College, Cambridge)</p>

<p>As part of the public consultation, feedback was gathered on the types of facilities the community would like to see. Tritax Park, Cambridge will provide facilities for employees, visitors and local residents, provisionally including sports facilities and circular walking routes to promote recreation and wellbeing.</p>	<p>204533 (Tritax Big Box Developments)</p>
<p>Facilities in centrally located employment hubs like the Cambridge Retail Park and the Beehive Centre should meet the needs of the wider community through offering a diverse mix of community, sports, leisure, culture or creative hubs facilities.</p>	<p>210564 (J Lewis, Cam Skate)</p>
<p>It is recognised that it is important that there is support for proposals for shared facilities in employment parks and campuses.</p>	<p>211560 (Martin Grant Land Limited)</p>

Policy J/MS: Market and street trading

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by several individuals and organisations, including the Cambridge Liberal Democrats. The Riverside Area Residents' Association and other public and private organisations along with individual members of the public stated their support for the establishment of a designated centre for street trading operations, particularly regular outdoors markets on Walnut Tree Avenue to host various types of markets for residents and visitors, and by Stourbridge Common entrance.

Comments were made by the Cambridge Green Party requesting amendments to paragraphs 2(c) & (d) to ensure appropriate public realm, utilities improvements and flexible spaces are designed to not adversely affect the vitality of the market. Girton PC requested the policy support periodic markets and micro-trading options in Girton, ensure siting prioritises Active Travel access and encourages community-led models that fit village identity. Cambridge Past, Present & Future, while supportive of the policy requested the supporting information refers to the unique historic legacy of Cambridge's traditional market. One member of the public objected to the draft's omission of the special historic significance of Cambridge Market.

An objection was also made to the reference in the supporting text regarding the need to ensure only complementary uses are retained within market stalls, based on similarity of physical products or services. Other objections to the policy were made regarding the lack of provision to retain traditional traders and the services they provide, nor to encourage local food producers and resulting low food-miles produce, including the graziers whose cattle are a greatly valued feature of Cambridge's

commons. On this matter, one member of the public commented on the recent planning application for the Market Square 25/04382/FUL not have regard to traditional traders and the services they provide and local food producers.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The first paragraph of the supporting information has been amended to acknowledge the historic legacy of Cambridge's traditional market.

The policy is applicable to markets and street trading located with the existing and emerging Designated Centres listed in Policy J/RC: Retail and other complementary town centre uses. Suggested locations for markets submitted during the public consultation would therefore fall outside the remit of the policy.

Public spaces suitable for market and, or street trading are also compatible with other public uses. This means a balance needs to be reached where these multi-functional spaces are designed to be safe, accessible and practical for a variety of market/street trading, cultural pursuits and community activities. While markets can help support the vitality and vibrancy of local centres, other temporary uses such as community and cultural activities can have both economic and social benefits. The policy's current wording is considered to reach that balance without prejudicing anyone of these uses, especially if public spaces can host a variety of these different yet complementary activities at the same time.

If the current criteria are met, development proposals should positively enhance the experience for both shoppers and traders while ensuring the markets themselves remain viable, vibrant and safe. Criterion (c) is focussed on ensuring a safe and accessible environment for all market users (both shoppers and traders). Criterion (d) is aimed at ensuring these spaces are also usable for both community and cultural activities. These uses would normally be temporary activities when market activity

is not present, this is particularly important in new centres where market frequency will normally be quite limited and community spaces may not have been fully developed. No policy change is therefore proposed.

An objection was also made to the reference in the supporting text regarding the need to ensure only complementary uses are retained within market stalls, based on similarity of physical products or services. It is important that local markets and street traders complement the local retail and service offer within the Designated Centre to maintain the viability and vitality of permanent retail and service facilities. Permanent retail units will have additional costs compared to temporary market stalls and street traders. Small retailers and food store operators are unlikely to commit to operating permanent retail units if local markets and street traders are allowed to dominate the local retail scene. The provision of cafés is one example whereby a mobile café provider, often small enough to fit on or adjacent to a market stall will, in an emerging new Designated Centre discourage a café opening up in a fixed retail unit. Unless there is sufficient demand for both providers, it is inevitable that the mobile provider will have less risk and low costs compared to the fixed café provider. It is therefore important that local markets are of a size, frequency and type that allows the permanent retail units/operators to trade profitably without significant trade diversion. This is particularly important in new settlements where their designated centres are still emerging; in these circumstances, the market or street trader offer should be subject to additional testing when proposed, to ensure they support these new centres with complementary good and services.

Regarding the objection lodged about the retention of traditional traders, the services they provide and the encouragement of local food producers, the policy relates to the provision of public markets and street trading, it is beyond the scope of planning to determine the nature of the public market and the provenance of their produce. Rather, the policy supports the development of new spaces that can facilitate markets and street trading that might otherwise not be a consideration for new centres and the design of their public realm. These spaces offer the opportunity for established traders to be retained in new locations that might otherwise not come about, especially in the area's new settlements and urban extensions.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support this policy:</p> <ul style="list-style-type: none"> Strongly support protecting the daily market in market square, especially local veg traders and other local sellers. We support this Policy 	<p>202812 (H Cook), 203062 (Cambridge City Council Liberal Democrat Group)</p>
<p>Point 2.c should be amended to read “c. secure appropriate public realm and utilities improvements, where necessary, to ensure the safe operation of street trader activities and maintain public access; and to positively enhance shoppers and traders experience and promote the vitality of the market.”</p> <p>Point 2.d should be amended to read “d. are designed to enable flexible usage for a range of other community and cultural activities only if it can be demonstrated this will not adversely affect the vitality of the market.”</p>	<p>203733 (Cambridge Green Party)</p>
<p>RARA supports establishing a designated centre for street trading operations, particularly regular outdoors markets on Walnut Tree Avenue, an under-used access road, and the space before the entrance of Stourbridge Common, hosting various types of markets for residents and visitors. The areas are not currently designated but have strong potential for smaller markets to emerge and grow over time, given pedestrian footfall and cycle flow data E/W along the river promenade and also N/S between the wards with better connectivity</p>	<p>204456 (Riverside Area Residents Association)</p>
<p>support: designated temporary, flexible outdoors markets/street trading: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project,</p> <ul style="list-style-type: none"> I support establishing a designated centre for street trading operations. 	<p>204950 (M Cleminson), 205224 (Cambridge)</p>

<ul style="list-style-type: none"> • I support regular outdoors markets on the Walnut Tree Avenue under-used access road, hosting various types of markets for residents and visitors, and by Stourbridge Common entrance. • The area is not currently designated but has strong potential for smaller markets to emerge and grow over time, given pedestrian footfall and cycle flow data E/W along the river promenade and also N/S between the wards with better connectivity 	<p>Junction), 204650 (T Woodcock), 204386 (NEUBAU Architects), 204266 (A Giarlis), 204267 (L Cooke)</p>
<p>I strongly believe that the recent planning application for the Market Square 25/04382/FUL doesn't recognise and safeguard the significance and value of our traditional traders, the services they provide, the importance of local, low food miles produce, nor balances the need of both traditional traders and hot food providers. I strongly encourage the drawing of a Local Plan that would protect local food producers, including the graziers whose cattle are a greatly-valued feature of Cambridge's commons, and traditional traders that make up the core of Cambridge appeal to the world. Finally, the high number of traders shouldn't be lowered</p>	<p>205297 (D Fornari)</p>
<p>The draft doesn't even mention the special historic significance of Cambridge Market (which predates the University). Its importance in bringing sustainable, fresh, low food miles produce to the people of Cambridge, and the historic links it provides between the city and its hinterland. The policy needs to promote and protect Cambridge's traditional market and its traders, and enshrine its traditional role in the face of pressures to turn into an outdoor food court</p>	<p>205470 (J Preston)</p>
<p>Against the plans aims, the proposals for Cambridge central market, will reduce the number of stalls and stall holders (who number more than the stalls - different businesses, different days), and their variety. it will destroy some of the greenest businesses in Cambridge increasing greenhouse gas emissions, which the council claim they want to reduce, and cause social exclusion.</p>	<p>205483 (A Copping)</p>

<p>The market traders have been operating successfully for many years without undue noise, smell, litter or traffic problems, and without presenting a danger to the public. If you want to avoid undue noise, don't replace the market with an events space!!</p>	
<p>J/MS 1 daily market in Market Square The selling of affordable, fresh, local seasonal fruit and vegetables will probably disappear from the market in the near future if local producers are not helped by subsidised stall rates and a free parking to allow selling healthy food to the Community. Please have a proportion of the market stalls must be for fresh, local, healthy food.</p>	207536 (Y Dignon)
<p>Cambridge Market isn't broke, so you are going to fix it! Obviously your opinions about it are much more expert than those of the market traders themselves. I think maybe you have an idea of listening to string quartets there in the evening or something??!! Some of the money you are going to spend there should be saved for RUNNING THE LOCAL ELECTIONS IN MAY!</p>	201256 (S Williams)
<p>Markets and street trading could support local enterprise and community activity, fitting well within Girton's identity. (Your document references interest in community-scale business and small local retail.)</p> <p>Key Points: Strong interest in small/local retail → markets are a natural extension. Markets reinforce local economy and community cohesion. They require careful siting to avoid parking and traffic impacts.</p> <p>GPC Requests to the Local Plan: Support periodic markets and micro-trading options in Girton. Ensure siting prioritises Active Travel access. Encourage community-led models that fit village identity.</p>	202250 (Girton PC)

<p>Visiting the market provides a social experience for locals and tourists alike. For locals, like myself, this forms a vital sense of community. Permanent retail units cannot and will not offer this social experience. Thus, a market stall offering the same physical goods or service as a permanent retail unit offers a different overall experience. Because of this I think it would be unjustified to remove market stalls based on similarity of physical products or services. This will be a great loss of community in Cambridge.</p>	<p>203415 (C Long)</p>
<p>The plan makes no provision to retain our traditional traders and the services they provide, nor to encourage local food producers and resulting low food-miles produce, including the graziers whose cattle are a greatly-valued feature of Cambridge's commons.</p> <p>Market Square has been the heart of Cambridge since the Middle Ages and is still an essential asset for Cambridge residents, the same ones who pay rates, contribute to local economy, live their lives here, and have the right to reject a plan which favours turning this site into yet another tourist trap - Cambridge already has enough of these.</p>	<p>202954 (J Addison)</p>
<p>You need to consider all the market square traders, and not just the shops around them. The small businesses need council help & support to continue to provide the goods & services that locals want and require. The market square DOES NOT & SHOULD NOT operate for tourists. The craft market provides for both locals & visitors.</p>	<p>203203 (C Diston)</p>
<p>The supporting information should state that Cambridge's traditional market possesses a unique historical legacy, having served as a vital community hub since before the founding of the University. The daily and Sunday stalls providing fresh food and produce represent a living connection to the city's</p>	<p>204198 (Cambridge Past, Present and Future)</p>

medieval heritage and its enduring relationship with the surrounding agricultural landscape, as well as a sustainable low carbon economy.	
It is recognised that it is important that policy explains the circumstances in which local markets and street traders will be supported in Designated Centres.	211561 (Martin Grant Land Limited)

Policy J/RC: Retail and other complementary town centres uses

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was broadly supported by Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners including the flexibility, in particular Parts 4 and 5. These respond to changing trading patterns and retail needs and given continued fluctuations in economic trends. This is especially the case for large strategic sites that are subject to a phased delivery over a significant period of time.

Stapleford PC commented on the supporting data for planning policy paragraph 2 being flawed because they incorrectly combine Great Shelford and Stapleford as a single 'local centre'. Stapleford PC consider them to be two distinct villages with separate histories, identities, and markedly different levels of services. Great Shelford contains most of the shops and amenities and could reasonably qualify as a local centre on its own, while Stapleford, considered independently does not meet the criteria.

Comments made by Girton PC highlighted the value of local retail, not large town-centre-scale uses. Retail should be modest, flexible, and village-appropriate. There is high interest in local retail which must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. Girton PC requested the Local Plan support modest, village-scale retail units and not large retail formats inappropriate to Minor Rural Centres. It is also important to integrate local retail within the Development Framework.

Comments were made by Abbey Properties Cambridgeshire Limited seeking clarification about paragraph 2 of the policy which refers to a hierarchy of centres with three tiers being suggested. They noted that the National Framework (NPPF) paragraph 91 requires a sequential test where development is outside of an existing centre. The current policy wording could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre.

A member of the public commented on the policy requirement (paragraph 8a) requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals.

Comments made by Cambridge Investment Partnership supported the sequential approach to the location of retail and main town centre uses in Greater Cambridge. They also acknowledged paragraph 4 of the policy regarding acceptable residential development in designated town centre locations. The respondent notes that paragraph 5, specifically criteria 5a and 5b, outlines conditions under which the loss of retail uses, or merging/subdivision of units is supported. The respondent requested that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses.

A member of the public commented on the potential of the Riverside area for small-scale retail and complementary uses. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate.

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet

changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.

Comments submitted by Railpen included a request for the former Beehive Centre site to be excluded from the list of designated Retail Centres in the Local Plan. Its current designation would conflict with the comprehensive, major redevelopment of the site which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity.

Comments submitted by McDonald's Restaurants Ltd questioned the current omission of Bar Hill within the proposed hierarchy of centres which could instead be a Local or District Centre given the current location of a large supermarket with a parade of supporting shops.

Response to the main issues raised in representations:

In response to Stapleford PC's comments about the supporting data for planning policy paragraph 2 being flawed, it should be noted that the corresponding defined local centre for 'Great Shelford and Stapleford' on the draft Policies Map is covers the high street uses in Great Shelford and not Stapleford. This means new retail and other town centres uses, commensurate in size to the centre's role within the hierarchy, will be directed to designated centres in areas they are intended to serve. Such developments in Stapleford (outside the high street boundary designation) would need to satisfy the requirements listed in paragraph 8 to be permitted.

Comments made by Girton PC highlighted the value of local retail, not large town centre scale uses. Retail should be

modest, flexible, and village-appropriate. There is high interest in local retail which must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. Girton PC requested the Local Plan support modest, village-scale retail units and not large retail formats inappropriate to Minor Rural Centres. It is also important to integrate local retail within the Development Framework. The draft policy supports this approach, ensuring retail and other town centres uses are directed to designated centres in areas they are intended to serve. Village-based retail uses would need to be appropriate to their village location.

Comments were made by Abbey Properties Cambridgeshire Limited seeking clarification as the current policy wording could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre. Paragraph 8 of the policy explains the conditions that need to be satisfied for retail and other main town centre uses outside designated centres. For a local shop intended to serve a particular local catchment area, it should be located in accordance with the sequential test. In this instance it should consider all appropriate centres, commensurate to the shop's size and intended catchment area. It is also worth noting that rural shop premises falling within Use Class F2(a) (Local community) category are treated as community facilities. As such a proposal for an F2(a) shop would be considered under Policy WS/CF: Community, Sports, and Leisure facilities. F2(a) are defined as shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres. The supporting text has been amended to clarify the application of the sequential test.

A member of the public commented on the policy requirement (paragraph 8a) requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals. The location of designated centres and their constituent town centres uses are very much determined by their accessibility, as such their location is inherently central to the area they serve and highly accessible by a variety of sustainable forms of transport.

Comments made by Cambridge Investment Partnership requested that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses. The marketing requirements, listed in paragraphs 4(a) and 5(a) are intended to test the commercial viability of the existing units and their current configuration. The output from these requirements should inform the commercial viability of these uses/spaces. The policy breadth of permissible uses (office, retail, leisure or cultural development) also provides a flexible approach to their continued use as a commercially viable use.

A member of the public commented on the potential of the Riverside area for small-scale retail and complementary uses. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate. The policy has already proposed to designate a part of Newmarket Road as a Local Centre. The supporting text also recognises Neighbourhood Centres as valuable means of providing for the everyday needs of smaller communities.

Both Railpen and Pioneer Group objected to the proposed policy approach which incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. The draft policy has been written with full regard to the NPPF and makes no mention of applying restrictions that result in fundamental conflicts with the NPPF or Town and Country Planning (Use Classes) Order. The supporting text explains how Changes to the Town and Country Planning (General Permitted Development) Order have resulted in various planning uses that were previously distinct being categorised under Use Class E (commercial, business and service). Change of use between the different types of planning uses listed under Class E does not constitute development and subsequently does not normally require planning permission. Whilst recognising the benefits and flexibility that Class E can bring, it also increases the risk of main town centre uses emerging in inappropriate edge-of-centre and out-of-centre locations, which could harm the vibrancy and vitality of Greater Cambridge's network of centres and eventually lead to the loss of retail and other town centre uses.

Similarly, valuable retail, leisure and other main town centres uses could in some cases be changed to other uses within Class Use E. The policy seeks to minimise this by establishing clear criteria for most development involving main town centre uses outside of Greater Cambridge's existing and emerging designated centres. However, the councils may apply other planning controls to safeguard main town centre uses in the most appropriate locations in the hierarchy of centres and reduce the proliferation of such uses elsewhere, including applying conditions on new development limiting the ability to change key retail or leisure floorspace to other uses within Use Class E without the need for planning permission. Other Permitted Rights may also be subject to restrictions dependent on local circumstances.

Comments submitted by Railpen included a request for the former Beehive Centre site to be excluded from the list of designated Retail Centres in the Local Plan. Its current designation would conflict with the comprehensive, major redevelopment of the site which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity. The proposed outline includes a replacement Local Centre and therefore it is considered necessary to designate the site accordingly. This does not preclude other uses coming forward on site.

Comments submitted by McDonald's Restaurants Ltd questioned the current omission of Bar Hill within the proposed hierarchy of centres. Bar Hill is currently designated as an existing Minor Rural Centre; this designation was reviewed as part of the review of the area's existing Settlement Hierarchy which concluded it should remain as a Minor Rural Centre.

Greater Cambridge Retail & Leisure Study – Interim Findings Report (2026) indicates the Tesco Extra Superstore, referred to in the comments has a sales floorspace of approximately 10,566 square metres net and a benchmark turnover of approximately £75 million. The report establishes that it is currently the largest supermarket in Greater Cambridge. The Tesco Extra Superstore is of a size that clearly serves a much wider catchment area than that of Bar Hill. The adjacent parade of shops also provide other town centre uses (at the time of writing this report) two opticians, one audiologist, a locksmith offering

other services including engraving & shoe repairs, a pet food supermarket, a restaurant and a café. Given Bar Hill’s resident population of approximately 4,000 people, it is again reasonable to assume these shops and services serve a much wider catchment than just Bar Hill. It is therefore reasonable to describe both the supermarket and other shops as an out-of-centre development. The NPPF’s description of a ‘Town centre’ clearly excludes "existing out-of-centre developments, comprising or including main town centre uses" as such and in accordance with the NPPF, the town centre facilities at Bar Hill do not constitute a town centre and therefore these have been omitted from the proposed hierarchy of centres.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>The supporting data for Clause 2 are flawed because they incorrectly combine Great Shelford and Stapleford as a single “local centre.” They are distinct villages with separate histories, identities, and markedly different levels of services. Although their development boundaries touch in one area, they are otherwise divided by Green Belt. Great Shelford, which contains most of the shops and amenities, could reasonably qualify as a local centre on its own. Stapleford, considered independently, does not meet the criteria.</p> <p>Treating them as one would misapply planning policy in Stapleford, creating inappropriate retail pressures and unacceptable development impacts on both communities.</p>	<p>201639 (Stapleford PC), 210952 (Great Shelford PC)</p>
<p>While section 8.a of the policy requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals.</p>	<p>202566 (P Tribble)</p>

<p>The respondent supports the sequential approach to the location of retail and main town centre uses in Greater Cambridge.</p> <p>The respondent acknowledges Part 4 of the policy regarding acceptable residential development in designated town centre locations. The respondent notes that Part 5, specifically criteria 5a and 5b, outlines conditions under which the loss of retail uses or merging/subdivision of units is supported.</p> <p>The respondent requests that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses.</p>	<p>204406 (Cambridge Investment Partnership)</p>
<p>The Riverside area has potential for small-scale retail and complementary uses, especially if Newmarket Road is re-established as a local centre and high street. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate.</p>	<p>204982 (M Cleminson)</p>
<p>Part 2 of the policy refers to a hierarchy of centres with three tiers being suggested. It must be noted that NPPF paragraph 91 does not require an assessment of each centre in order - it requires a sequential test where development is outside of an existing centre. As worded the policy could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre. Clarification should be provided.</p>	<p>205075 (Abbey Properties Cambridgeshire Limited)</p>
<p>The proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to</p>	<p>207452 (Pioneer Group)</p>

<p>adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.</p>	
<p>Girton values local retail, not large town-centre-scale uses. Retail should be modest, flexible, and village-appropriate. Key Points: Survey shows high interest in local retail. Retail must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. GPC Requests to the Local Plan: Support modest, village-scale retail units. Avoid large retail formats inappropriate to Minor Rural Centres. Integrate local retail into the Development Framework.</p>	202251 (Girton PC)
<p>We request that the former Beehive Centre site is excluded from the list of designated Retail Centres in the Local Plan. Designating the site as a Retail Centre creates a direct policy conflict with the Council's ambition to achieve a comprehensive, major redevelopment of the site, which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity.</p>	203451 (Railpen)
<p>Railpen objects to the inclusion of the Beehive Centre in Policy J/RC part 5, stating that the current wording imposes unnecessary and disproportionate requirements that could undermine development effectiveness. Railpen requests the exclusion of the former Beehive Centre site from the designated Retail Centres in the Local Plan, citing a conflict with the Council's plans for comprehensive redevelopment, including a commercial R&D-led scheme. Railpen objects to the wording of paragraph 8.92 related to Policy J/RC, advocating for greater flexibility to prevent empty shop locations and enhance deliverability, aligning with the goals of the NPPF.</p>	203988 (Railpen)

<p>Broadly support Policy J/RC. The local centre at Darwin Green has been implemented in part and will establish further as occupations increase. The flexibility within the Policy, in particular Parts 4 and 5, are welcomed in order to adapt to changing trading patterns and retail needs and given continued fluctuations in economic trends. This is especially the case for large strategic sites that are subject to a phased delivery over a significant period of time.</p>	<p>203104 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>
<p>Policy J/RC supporting text 8.80, It is unclear how Bar Hill meets this definition, Bar Hill is not a small rural hinterland and contains a large population, Tesco Superstore, along with a parade of supporting retail shops, large car parking area and petrol filling station. The retail area of Bar Hill is not dispersed across the settlement and could easily be identified on the Policy Map. It is therefore questioned whether Bar Hill is appropriately categorised within the hierarchy of centres and could instead be a Local or District Centre.</p>	<p>207892 (McDonald's Restaurants Ltd)</p>
<p>Support. It is recognised that it is important that the policy includes support for a new town centre at Cambourne North.</p>	<p>211562 (Martin Grant Land Limited)</p>

Policy J/SA: Cambridge City's Primary Shopping Area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/SA, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.

Comments from the Cambridge City Council Liberal Democrat Group cited concerns about the harm caused by gambling and betting outlets. They requested restrictions on such outlets to avoid large concentrations in one area.

Comments made by Girton Parish Council raised concerns about the application of the policy and requested clarification on the matter. Girton PC also stated their support for dispersed local retail rather than centralised city-focused provision.

Comments were received about the function and role of Cambridge East as a secondary shopping area / urban centre for the specific purposes of residential needs both within the city and the surrounding new towns and villages, along with other support functions.

Response to the main issues raised in representations:

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. The draft policy has been written with full regard to the NPPF and makes no mention of applying restrictions that result in fundamental conflicts with the NPPF or Town and Country Planning (Use Classes) Order. The supporting text explains how, in order to support the Primary Shopping Area's (PSA) retail, leisure and town centres services, all new retail, leisure and mixed-use town centre development within the designated PSA will be controlled using appropriate planning measures, including conditions, to ensure ground-floor occupancy is restricted to specific land uses identified as generally acceptable in the PSA, as set out in the policy. Planning controls may also be used to restrict the use of permitted development rights to change the use of existing units or control movement between different uses that fall within the same planning use class.

Changes to the Town and Country Planning (General Permitted Development) Order have resulted in various planning uses that were previously distinct being categorised under Use Class E (commercial, business and service). Change of use between the different types of planning uses listed under Class E does not constitute development and subsequently does not normally require planning permission. Whilst recognising the benefits and flexibility that Class E can bring, it also increases the risk of main town centre uses in the PSA changing without consideration for the role and function of the PSA which it is intended to provide. The NPPF defines PSAs as an area where retail development is concentrated. Paragraph 90(b) also states planning policies should make clear the range of uses permitted in such Primary Shopping Areas.

In Cambridge City Centre, in recent years several useful retail shops and services have converted to fast-food outlets. Opticians and other types of retail shops have been replaced by fast food 'restaurants'; they include minimal seating to distinguish themselves from fast food/takeaway. It is therefore important that the PSA is allowed to perform its role and

function by ensuring units within its boundary are retained to meet consumers' retail needs. As such, the Councils are keen to protect and, where possible, enhance the Primary Shopping Area's important retail functions and frontages. To achieve this, retail along with other leisure and town centre services will be promoted on ground floor level spaces with retail use taking precedence, whilst other leisure (arts, culture and entertainment) uses will be supported on basement levels or upper floors provided they do not undermine the PSA's retail functions.

In response to the concerns raised by the Cambridge City Council Liberal Democrat Group about gambling and betting uses on the high street, policy WS/HD: Creating healthy new developments has been amended. This policy now includes measures to direct these uses to designated centres where their number will be restricted.

For clarification, Girton is not part of Cambridge's Primary Shopping Area and therefore not applicable to any part of Girton. The policy is only applicable to Cambridge's Primary Shopping Area, as designated on the draft Policies Map.

In response to the comments received regarding Cambridge East, the urban extension is intended to form part of a large urban extension. It is expected to have a district centre with a few smaller local centres. It is important that people can easily access shops and services using sustainable forms of development, to meet their day-to-day needs. This will reduce the need for travel extensively for their daily needs and support viable and vibrancy district and local centres. It is important that these centres complement other centres including the city centre and nearby town centres (both planned and emerging) including those beyond Greater Cambridge. If Cambridge East were to provide services for people beyond its catchment area, this would encourage people to travel further from their own centres and cause 'trade-diversion' undermining other city/town centres. Town centre uses in Cambridge East will need to be carefully planned to ensure they complement rather than undermines other centres.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>As we commented earlier for the policy Creating Healthy New Developments we would like to add on something around gambling and betting harm and restrictions on such outlets to avoid large concentrations in one area. We would support further evidence being gathered on this now so it could be included at Regulation 19.</p>	<p>203067 (Cambridge City Council Liberal Democrat Group)</p>
<p>Given that the Council now proposes to split policy in respect of the Primary Shopping Area from draft Policy J/RC, the objections in relation to J/RC follow into the wording proposed for J/SA</p>	<p>207453 (Pioneer Group)</p>
<p>Girton is not part of Cambridge's Primary Shopping Area; retail needs are local and community-focused. Key Points: PCA policies must not be applied to Girton. Girton requires small, rural-appropriate retail. Avoid policies that centralise retail activity away from villages. GPC Requests to the Local Plan: Clarify that PCA policies do not apply to Girton. Support dispersed local retail rather than centralised city-focused provision.</p>	<p>202252 (Girton PC)</p>
<p>Consider designating Cambridge East as a secondary shopping area / urban centre for the specific purposes of residential needs both within the city and the surrounding new towns and villages. These could be as support functions for the anchor institutions I've suggested in other submissions. (City hall for unitary council, large concert hall, lifelong learning college, railway station/transport interchange). Provision could also be made for a nighttime economy neighbourhood where venues can stay open late without disturbing residential neighbourhoods or colleges.</p>	<p>203812 (A Carpen)</p>

Policy J/VA: Visitor accommodation, attractions and facilities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Members of the Cambridge Hoteliers Association (CHA) highlighted the importance of visitor accommodation to the Greater Cambridge economy but also the rising costs, lower occupancy levels and a shift towards operating models with lower costs being faced by the sector. As a result, they state they are facing serious viability challenges. The requests for the plan are that given the current oversupply in the market, including from short term lets, it should not support additional hotel provision until a significant clear, evidence-led increase in underlying overnight demand can be demonstrated and the existing oversupply is cleared; to avoid exacerbating the overall supply, it should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing; that short-term lets are fully integrated into its evidence base and policy framework, rather than treated as a peripheral or secondary issue; for compulsory registration linked to clear planning control to be explicitly embedded within policy; it acknowledges the commercial realities for hotels wishing to complete a change to more economically viable use classes and greater consistency in the application of affordable housing policy across accommodation types is introduced to support housing delivery and reduce unintended incentives.

Elsewhere, whilst some aspects of the plan were welcomed, there were objections to the policy from some other respondents. Concerns included the stringency of the proposed test for assessing the loss of visitor accommodation given the housing pressures in Greater Cambridge and the capacity of key Cambridge city centre areas to accommodate visitors safely and pleasantly. A more

proportionate and economically grounded approach to the conversion of visitor accommodation to housing was requested, as was an assessment of the capacity of city centre areas to accommodate predicted visitors to feed into the Plan's assessment of the quantum of tourism to plan for and the hard and soft infrastructure to provide. A strategy to direct visitors to suitable (less conflictual) parts of the centre would help manage impacts. The potential of tourist tax(es) funding was highlighted.

Further concerns were expressed around the conversion of smaller dwellings to visitor accommodation and, in particular short-term lets. The impacts cited included cumulative impacts of these conversions on disruption from increased visitor traffic and negative effects on local workers seeking rental properties. Additional work was requested to establish an evidence base on these impacts and to ensure the policy remains robust against potential national policy changes. There was a request for the policy to acknowledge IWM Duxford's designation as an Area of Major Change and one for the policy to express support for visitor accommodation within new / expanded settlements. A parish council request was to resist large-scale visitor accommodation, support only low impact village-appropriate accommodation and protect the rural edges of villages and countryside that provides a barrier between village and urban development. Hotels, potentially with large conferencing facilities, were supported on science/technology parks and close to a train station, although not to the point where it compromised the space available for science-based development. It was requested that an additional criteria be added to proposals for new or extended tourist facilities and visitor attractions in the countryside – that the site should be accessible by public or active transport. The value of the equestrian sector to the visitor economy was also highlighted.

Response to the main issues raised in representations:

Representations are noted. The visitor economy continues to be an important economic sector for Greater Cambridge, helping to generate a range of jobs for local residents and to support a large number of local businesses. It's importance locally has been

balanced with the need for affordable new homes and with the ability of owners to respond to market signals and it is considered that the continuation and extension of the protections for existing visitor accommodation from the 2018 Cambridge Local Plan is reasonable. It is the role of the plan to ensure that there is sufficient visitor accommodation for the demand for bedspaces generated by visitors to Greater Cambridge. As a land use plan, it is not appropriate for the plan to seek to control the numbers or destinations of visitors to different parts of the area. Agencies such as Visit Cambridge and Visit South Cambs, including as part of the newly announced Cambridgeshire and Peterborough Local Visitor Economy Partnership (LVIP), have a key role in ensuring that there is the knowledge, infrastructure and funding to ensure that the impacts of Greater Cambridge as a visitor destination are positive for residents, businesses and visitors. By supporting new visitor attractions that complement the existing cultural heritage of the city, are limited in scale and assist the diversification of the attractions on offer, especially to better support the needs of families, the Local Plan recognises the need to diversify and enhance the visitor experience in Cambridge whilst recognising the potential negative impacts that large scale developments could bring.

The prevalence and impacts of short term lettings are considered in our Greater Cambridge Future Hotel Need Study (2025) which has provided the evidence base for the policy and in the First Proposals topic paper which considered the impacts of concentrations of short term letting in areas. The Government have [indicated](#) that they are introducing a mandatory national registration scheme for short-term lettings in England which is expected to begin in 2026. The introduction of a licensing scheme will provide an accurate picture of the number and location of premises within Greater Cambridge which can then be used to support the implementation of future Government policy. Were Government to introduce a new use class for short term lettings in line with a previous Government consultation, any new lettings would require planning permission. The proposed Local Plan policy states that where planning permission is required, it allows the conversion of residential properties to visitor accommodation use only in exceptional circumstances. The policy would therefore be complementary to such a national policy change.

The supporting information for J/VA sets out that where proposals for apart-hotels or serviced apartments are considered to fall within Use Class C3 or comprise sui generis uses which have the characteristics of a C3 use, such proposals will be assessed via relevant housing policies in the Local Plan including requirements for affordable housing. It also sets out that where apart-hotels and serviced apartment units fall under C1 or Sui Generis uses, the councils will take steps to ensure they will not be used for any other purpose.

It is considered that the importance of Imperial War Museum Duxford is reflected in policy S/AMC/IWM: Imperial War Museum, Duxford. The Local Plan should be read as a whole and it is not therefore considered appropriate to cross reference to policy S/AMC/IWM within policy J/VA. The policy recognises that science and business parks are suitable locations for new visitor accommodation and whilst other policies in the plan seek to ensure that non-employment uses are ancillary or complementary to the primary employment uses. It is considered that the policy will ensure that any new visitor accommodation or attractions will be appropriately scaled to their location, including any new towns or settlements. Other policies in the plan address the need for opportunities for active travel to/from new developments.

The Draft Policy was informed by our Greater Cambridge Future Hotel Need Study (2025). We therefore asked the consultants who carried out the study to review the representations which we received where there was reference the findings of the Study. The response can be found below.

A focus on hotels

The study does present both hotel and short let supply and performance information. The balance of information presented is significantly determined by the data available but both sectors are presented. The focus on hotel projections is fundamentally driven by the scope of work. It is also appropriate since hotel and hotel-style serviced apartment accommodation is the dominant form of

accommodation, includes providers of accommodation at scale per site (10 to 230+ rooms); and as regulated and planned providers of accommodation, it is this sector that should be the driving component of planning future overnight accommodation.

Short let accommodation has grown significantly nationally and in the Cambridge area. In parallel, hotel room night supply and demand has grown enormously in Cambridge city in the last 10 years. This growth has been despite the growth in short lets, and strong occupancies are still maintained. This shows that there is a growth market to address in hotel provision that is not being absorbed by short let supply increases. There is a need to focus on future hotel supply because hotels have a significant role in city brand, international recognition, and business tourism significantly, as well as leisure. Hotel room provision is not interchangeable with short lets provision; it is a larger and significantly growing market in itself and one that is appropriate to forecast for.

The extent of short let accommodation is noted in the study. This market segment runs alongside hotels. As explained, demand for future hotel rooms should not be considered to be met by short let supply as a direct and equal equivalent to being met by hotel room supply. There is some interplay in the guest markets using hotels and short let accommodation, but it is not appropriate for future hotel provision and planning to be determined by the relatively uncontrolled sector of short lets. Rather, it is important to plan for potential future hotel need (and its evolution in types as determined by market desire) in order to create a destination with accommodation supply that is planned, controlled and fitting to the brand positioning of Greater Cambridge now and in the future as an international business and tourism hub, as well as growing residential area.

A prioritising of hotels enables suitable provision in locations that fit wider planning objectives. It is important to not limit future hotel provision as the response to growth in short lets. Rather, the market determines whether planned-for hotel permissions are pursued and the matter to be addressed is the control of provision and regulation of short let accommodation such that it becomes a type of planned provision that is operating and taxed on a level playing field with hotels.

Extent of hotel supply

For clarification, the study supports the principle that overnight accommodation need is a response to demand drivers. As such, expected growth in these drivers is the determinant of expected future hotel need, and growth in tourism support and generators of tourism demand are key in the future success of hotels.

A net increase of new supply is not expected within a context of no additional demand. Indeed the study did not forecast a need for additional supply in the immediate term. The forecast was presented for additional supply need from 2027 based on assumed market growth and supply openings.

Additional supply need was determined due to projected growth in demand, which in turn is a function of other projections such as business growth and leisure demand. If such growth does not occur then this will have an onward impact on hotel demand. It is the market that will determine the viability of future hotels. Supply projections are made in order to plan for potential future need rather than to limit the behaviour of the market.

An annual occupancy of 78% has been used to determine future supply. This is a level that we consider appropriate for this area as a stabilised market based on its weekly and monthly seasonality. It is important to note though that this does not mean that all hotels will be currently at this level, some will be above and some below, and different subsectors of the supply will perform in different ways. It is a suitable average for modelling this market however and is above the national average. In 2024, the national average for regional UK was 76.3% occupancy and £93 ADR [STR]. In relation to Cambridge performance at 77.2% occupancy and £110 ADR [STR] at that time it is not unreasonable to consider 78% occupancy as a position for when additional supply could be absorbed.

It is additionally of note that Cambridge enjoys a level of occupancy and ADR superior to many other locations where the hotel market remains competitive and healthy. A future scenario of hotel provision may alter the current premium occupancy and ADR achieved but this does not warrant limitation of hotel permissions by the council. It is a markets matter. The overall objective of a council is assumed to be to have a healthy hotel market and the wider benefits and facilitations thereof, and does not include a remit to protect individual hotels.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Object selected	202503 (M Parsons, University of Cambridge), 204225 (S Nicholas, Cambridge Past, Present and Future), 203532 (Cambridge Ahead), 205117 (W Davies)
Support selected	203073 (K Porrer, Cambridge City Council Liberal Democrat Group)

<p>Visitor accommodation is not a primary need. If proposed, it must respect rural character, avoid traffic impacts, and support the local economy and avoid undermining landscape or community facilities. Small-scale, low-impact models are acceptable if locally beneficial. The policy should resist large-scale visitor accommodation; only support small, low-impact, village-appropriate proposals and protect the Girton Gap and rural edges from tourism-driven development.</p>	<p>202253 (Y Murray, Girton PC)</p>
<p>Welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply.</p>	<p>203532 (E Pritchard, Cambridge Ahead)</p>
<p>Concern regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge's sustained and exceptional growth trajectory, there is a strong case for facilitating the conversion of visitor accommodation to residential use or student accommodation through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes and/or student accommodation.</p>	<p>202503 (M Parsons, University of Cambridge), 203532 (E Pritchard, Cambridge Ahead)</p>
<p>Permitted Development regulations limit the Local Planning Authority's ability to regulate conversions of smaller dwellings to visitor accommodation, affecting housing availability. The cumulative impacts of these conversions in Cambridge cause disruption from increased visitor traffic and the negative effects on local workers seeking rental properties. There should be further work on the policy before Regulation 19 to establish an evidence base on the impact of converting smaller dwellings and to ensure the policy remains robust against potential national policy changes.</p>	<p>203073 (K Porrer, Cambridge City Council Liberal Democrat Group)</p>

<p>As an additional point under “11. Proposals for new or extended tourist facilities and visitor attractions (excluding accommodation) in the countryside will be supported where it can be demonstrated that:”, we recommend adding “f. The site should be accessible by public or active transport.”</p>	<p>203736 (R Comins, Cambridge Green Party)</p>
<p>The importance of hotels to the local economy and social infrastructure is highlighted including through their spending in local businesses, the year round employment opportunities they offer, their role in the Cambridge Cluster eco-system supporting inward investment, international collaboration and major employment hubs by providing accommodation, and meeting and networking space as well as their role in place-making including reinforcing city centre vitality, providing consistent day and evening footfall and supporting Cambridge’s global brand as a centre of excellence. Constraining or destabilising the hotel sector risks not only the loss of discretionary visitor spend but also weakening the wider ecosystem that supports employment, business growth, innovation and long-term economic resilience. The CHA considers that protecting the viability of the hotel sector is integral to delivering the Local Plan’s wider economic, employment and placemaking objectives.</p> <p>Cambridge’s hotel sector is operating in an increasingly high-cost environment alongside weakened demand, lower occupancy levels and an accelerating shift in visitor accommodation towards aparthotels, serviced apartments, B&Bs and home-stay style models, which can operate with materially lower operating costs and fewer staffing requirements. The market is also becoming increasingly saturated, with new bedspaces coming forward in a relatively small geographic area and continued pipeline supply expected. Hotels are therefore responding to serious viability challenges by diversify their offers to protect occupancy and footfall, for example by expanding bar and food-led propositions.</p>	<p>204169, 207773, 211860, 211861, 211862, 211863, 211864, 211866, 211867, 207772 and 211876 (R Finn, Hilton Cambridge City Centre), 204256 (S Andreou, Centennial Hotel), 204322 (K Bentley), 204606 (S Papon, The Lensfield Hotel), 204966 and 204987 (R Norfolk), 205034 (S Garwood, Holiday Inn Express Cambridge West Cambourne), 205117 (W Davies), 205130 (R Hutton, Holiday Inn), 205207, 206931, 206932, 206933, 206934, 206935 and 206936 (D Rowson,</p>

<p>In addition, the cost base for hotels is expected to rise sharply through business rates changes: UK Hospitality estimates the average hotel will face an overall increase of 115% over the next three years</p> <p>While plan-led provision is essential, there is concern that the scale of additional bedspaces envisaged risks materially overshooting realistic demand when set against current trading conditions and recent delivery including the growth in short term lets leading to provision of double the upper growth projection set out in the 2012 Hotel study.</p> <p>Evidence of the effect this oversupply is having on the market can be found in occupancy rates. The 2025 hotels study states that a hotel occupancy rate of 78% is needed to achieve a stabilised hotel market across Greater Cambridge. CHA members consider that the market is therefore not stabilised with such occupancy levels seldom achieved under current market conditions. Encouraging further hotel growth risks embedding structural oversupply, undermining viability, investment confidence and employment across an established sector. Given existing and consented supply and the scale of short-term lets already operating, the Local Plan should not support additional hotel provision until a significant clear, evidence-led increase in underlying overnight demand can be demonstrated; and the existing oversupply is cleared.</p> <p>The draft Local Plan places significant emphasis on the provision of additional visitor accommodation as a means of increasing overnight visitors. This approach is overly supply-led and insufficiently focused on the underlying drivers of demand. These drivers are the presence of attractions, employment uses,</p>	<p>Concilio Communication), 205305 (D Chaplin, Gonville Hotels Limited), 205479 (P Greer, CUA Hotel Limited)</p>
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events, conferences, cultural institutions and visitor experiences that require people to stay overnight. The CHA's position is that the Local Plan should prioritise demand-driving uses that increase overnight stays and economic activity and should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing.

In Cambridge there remains significant scope to strengthen and diversify demand-driving uses that increase dwell time, extend stays and convert day visits into overnight visits e.g. strategy for improved transport infrastructure, conference and exhibition facilities, academic and research-related events, cultural and performance venues, festivals, major sporting and recreational events, and publicly accessible attractions that operate year-round. The Local Plan should place greater emphasis on supporting such demand-driving uses, particularly where they help to reduce seasonality, smooth weekly and annual occupancy patterns and reinforce Cambridge's position as an international destination. It should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing to avoid exacerbating the structural oversupply highlighted above.

A fundamental concern with the draft Local Plan is that its approach to visitor accommodation need does not adequately reflect the scale and impact of short-term lets. While these uses now form a substantial part of Cambridge's accommodation offer, they are not fully integrated into the Plan's evidence base or policy framework. While the 2025 Hotels Study recognises the importance of maintaining an adequate supply of accommodation to support economic growth, this evidence

demonstrates that the baseline position already reflects a material level of provision once all accommodation types are considered. It is essential that short-term lets are fully integrated into the Local Plan's evidence base and policy framework, with a more cautious, fully integrated assessment of hotel need that explicitly accounts for the scale and impact of short-term lets, rather than treated as a peripheral or secondary issue before encouraging additional hotel bedroom growth.

The level of bedroom growth predicted in the 2012 Hotels Study has been substantially exceeded. When short-term lets are incorporated into the analysis, this indicates a combined supply of almost 3,600 visitor accommodation bedrooms, more than double the number of bedrooms in the upper growth scenario envisaged in the 2012 study. The Local Plan risks planning for further growth against an already oversupplied market, reinforcing the need for a more cautious, fully integrated assessment of hotel need that explicitly accounts for the scale and impact of short-term lets before encouraging additional hotel bedroom growth.

Hotels operate within a comprehensive and highly regulated and high-cost environment whilst short-term lets operate at scale under a materially lighter-touch regime, frequently without equivalent planning scrutiny or effective enforcement. This creates an uneven playing field and distorts market behaviour. Failure to deal with unauthorised short-term letting has contributed to nuisance impacts in residential areas and undermined amenity and community cohesion. It also places pressure on the housing market, particularly affordability including for key workers, by reducing the supply of homes. The CHA considers that, without compulsory registration linked to clear planning control, the Local Plan will fail to

address regulatory imbalance, housing loss and market distortion caused by short-term letting, and therefore calls for these measures to be explicitly embedded within policy.

Without registration, the Council cannot easily identify which properties are operating as short-term rentals, distinguish genuine home-sharing from commercial activity, or ensure compliance with basic requirements. Registration should be linked to an explicit policy framework confirming when short-term letting amounts to a material change of use and requiring planning permission. The Plan should also enable the designation of controlled zones (such as the city centre and other high-pressure areas) where planning permission for short-term letting is compulsory. Where hosts operate multiple short-term lets, these should be treated as aggregated commercial activity for VAT and business rates compliance purposes to ensure parity with regulated visitor accommodation.

The draft Local Plan adopts a restrictive approach to changes of use involving visitor accommodation, particularly where this would result in the loss of existing hotels. At the same time, the Plan states that the conversion of existing residential properties to hotels will only be supported in exceptional circumstances, in order to maintain housing supply and protect residential amenity. While this objective is understood, the policy position is internally inconsistent and undermined in practice by the widespread growth of short-term lets. Introducing a registration requirement, supported by the designation of controlled zones in areas of highest housing pressure, would allow the Local Plan to draw a clear and enforceable distinction between genuine residential use, incidental home-sharing, and commercial short-term accommodation. This would significantly strengthen the Plan's ability to protect

housing stock, while restoring parity between informal accommodation and professionally managed hotels.

Residential properties are already being converted into commercial visitor accommodation through short-term letting, generally without planning consent. Effective enforcement is not economically practical and therefore despite widespread acknowledgement of the issues, the Council is hard pressed to get on top of this. The result is a situation where informal, lightly regulated accommodation can displace housing with relative ease, while formal hotel operation is correctly constrained and tightly controlled. This inconsistency weakens the credibility of the policy framework and highlights the need for a more coherent and enforceable approach to use change.

The Plan's approach to changing existing hotel use to alternative uses is slow, resource-intensive and poorly aligned with real-world market conditions. It prevents buildings from responding efficiently to economic signals, locks in underperforming uses, and delays the delivery of potentially more beneficial outcomes, including housing. The CHA therefore calls for the Local Plan to acknowledge commercial realities for hotels wishing to complete a change to more economically viable use classes.

The draft Local Plan's approach to affordable housing has the potential to influence development outcomes through the application of different requirements to residential development and certain forms of visitor accommodation. Evidence suggests that variations in affordable housing thresholds can play a role in shaping development proposals and land-use choices. A revised affordable housing requirement

<p>of 25% could help to support housing delivery and scheme viability across a broader range of sites. Plus, greater consistency in the application of affordable housing requirements across residential and other uses would help to reduce unintended incentives and ensure that development decisions are guided by the most appropriate and policy-aligned use of land.</p> <p>These issues point to the need for a more integrated, proportionate and enforceable approach to visitor accommodation within the Local Plan – one that recognises the full spectrum of accommodation provision, aligns regulatory requirements more closely across uses, and allows market forces to operate within a clear and consistent planning framework. The Local Plan offers a timely opportunity to begin addressing the impacts of short-term lets through the planning system, including through compulsory registration, clearer change-of-use triggers and the removal of exemptions that undermine housing protection. While planning policy alone cannot resolve all aspects of short-term let regulation, these measures would represent an important first step in establishing greater oversight, fairness and consistency.</p>	
<p>Given the quantum of visitors, particularly day visitors, and their impact on central areas of the City (impacted by both visitors and their vehicles and already unpleasantly congested), especially with projected population growth which will increase current pressures, the Plan should assess the capacity of key city centre areas to accommodate visitors safely and pleasantly, considering costs and benefits to determine the quantum of tourism for which the Plan should plan and make provision for.</p>	<p>204225 (S Nicholas. Cambridge Past, Present and Future)</p>

<p>Unrestrained numbers of tourist visitors (we did not find a forecast of day visitor numbers in the documentation) will further exacerbate the problem.</p> <p>Tourism should be viewed through lens of the area's global reputation for education, research and innovation, maintaining this reputation requires the city to be an attractive place for residents, including internationally mobile workers.</p>	
<p>The Plan should provide hard and soft infrastructure for the estimated desired numbers of both day visitors and longer-staying tourists, along with a strategy to direct them to suitable (less conflictual) parts of the centre. The funding for this and for curating the city centre (information, signage, street cleaning, pavement maintenance etc.) might be sought from a form of tourist tax(es), which should include a modest charge on group tours if possible.</p>	<p>204225 (S Nicholas, Cambridge Past, Present and Future)</p>
<p>Support policies that encourage visitor accommodation in mixed-use developments, such as science parks, as it helps prevent the conversion of houses into short-term lets in surrounding neighbourhoods ((some of which are negatively affecting the appearance and character of those neighbourhoods).</p>	<p>204225 (S Nicholas, Cambridge Past, Present and Future)</p>
<p>Visitor accommodation on science parks should minimise land use for this purpose to ensure sufficient space for science-based development. This should be reflected in the policy or supporting text.</p>	<p>204225 (S Nicholas, Cambridge Past, Present and Future)</p>
<p>The policy refers to visitor attractions outside the defined development of Cambridge will be permitted only where they utilise and enhance existing assets, are appropriate for their location and acceptable in terms of need, environmental and traffic impacts. To acknowledge and establish support in principle for</p>	<p>208282 (Imperial War Museum)</p>

<p>appropriate development at IWM Duxford, the text should be changed to recognise that IWM Duxford has a specific designation as an Area of Major Change under policy S/AMC/IWM as follows:</p> <p>“In South Cambridgeshire there are a number of assets which have become major tourist visitor attractions, such as the World War II airfield at Duxford which is now home to the Imperial War Museum, and Wimpole Hall which is owned by the National Trust. Facilities such as these can only be developed where the assets exist.</p> <p>Imperial War Museum Duxford is treated as a special case as a museum which is a major tourist / visitor attraction, educational, commercial and aviation facility and is designated as an Area of Major Change under policy S/AMC/IWM which provides scope for further development focused on aviation and other uses which are complementary and support the future of the museum site.</p> <p>The policy is intended to support the districts existing attractions and assets. It is not the intention of the policy to encourage new major tourist attractions.”</p>	
<p>Pleased to see references to Wimpole Hall as a major tourist visitor attraction, and support policy J/VA which seeks to support existing attractions and new associated infrastructure where appropriate.</p>	<p>211084 (MEE Planning Team, The National Trust)</p>
<p>One or two of the sci-tech park developments should be encouraged to build a large 4-star hotel with very large conferencing facilities. (A main conferencing hall with capacity for at least 1,000 seated). It should also be located close to an existing or proposed railway station.</p>	<p>203813 (A Carpen)</p>
<p>Rural Active Travel and PROW network should be bridleway to include horseriders. Horseriding is good economic activity - horseriding holidays, contributing to local jobs, pubs, etc.</p>	<p>204051 (S Rogers)</p>

MGL consider that the proposed policy wording does not provide express support for visitor accommodation within new / expanded settlements, and it is important that it does provide support for this as part of a demand-led, mixed and balanced economy.	211563 (Martin Grant Land Limited)
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Policy J/FD: Faculty development and specialist/language school

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was support for the policy approach from the University of Cambridge, highlighting its alignment with their Strategic Estate Framework, which aims for effective land use, mixed uses on larger sites, improved public realm, active frontages, and reduced car parking. The University of Cambridge suggested further clarity regarding the inclusion of sites outside the City Centre that are not listed as strategic University Sites.

Comments were made by ARU indicated the benefits of their university campus to Greater Cambridge should be explored further in the supporting text. ARU commented on their strong support for university development within the Eastern Gate and Grafton Area of Major Change. However, parts of the East Road campus may well deliver student accommodation, as well as faculty teaching/administrative facilities. On this basis, ARU requested that the extent of the ARU 'campus' be defined within this policy and associated proposals map so that it can suitably inter-relate with the reading of other policies such as draft Affordable Housing (H/AH) policy. Such an approach would provide greater clarity when interpreting the Development Plan as a whole.

Cambridge Past Present & Future expresses concern over the differing terminology used in the policy, noting that Faculty Development and language schools are 'supported' while University developments are merely 'permitted', questioning the rationale behind this distinction. The respondent also requested clarification on point (b) regarding language schools, specifically whether the policy applies only to non-local students, as the current wording lacks clarity on this aspect. The

respondent highlights the absence of location considerations for language schools, suggesting that large language schools near residential areas could lead to conflicts due to noise from hostels accommodating students, recommending that the policy should address this potential issue.

Concerns from Girton PC were raised about the impact existing education facilities have on local infrastructure. New faculty proposals must be evaluated against impacts on Active Travel, safety, and rural character. The PC requested the new Local Plan require safe Active Travel routes for any new faculty or education-related proposal, impact assessments on landscape and character; and avoid institutional expansion that urbanises Girton.

Further responses received included comments about the approach taken towards campus expansion, supporting new campuses such as Eddington and not the intensification of existing campus locations. Other comments related to the utility of specialist/language schools providing new students with some practical wayfaring guidance or even bespoke transport on their initial arrival, often with luggage to facilitate their welcome and avoid inconvenience to local residents also trying to use the same local public transport.

[Response to the main issues raised in representations](#)

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Paragraph 6 of the policy has been amended to clarify the approach taken for other university sites beyond the city centre that are not specifically listed elsewhere in the policy. The policy wording is intended to allow sufficient flexibility for applicable sites from either university.

To address specific concerns raised by Cambridge Past Present & Future, paragraph 7(a) has been amended with an additional requirement that addresses concerns over local residents' amenity, and paragraph 7(b) clarifying that paragraph

7(b) applies to non-local students.

Following proposed changes to the Affordable Housing (H/AH) policy, there is no longer a requirement to define the extent of the ARU 'campus' within this policy or associated proposals map.

Other transport related matters would normally been treated by Policy I/ST: Sustainable Transport and Connectivity. The reference to the continued support for development of Eddington (Site C/NWC) has not changed in Policy J/FD: Faculty development and specialist/language school.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
It would be helpful if specialist language schools could provide their students with a guide to the local area before arrival. Large numbers of students with no change for bus fare when they arrive at the station, all with luggage and excitedly shouting in their own language, can be off putting to residents and can seem intimidating. Maybe language schools could be required to provide their own transport for the students to avoid embarrassment and delays when trying to board the bus?	201042 (P Spowart)
Girton already experiences infrastructure pressure from proximity to education facilities (e.g., Eddington). New faculty proposals must be evaluated against impacts on Active Travel, safety, and rural character. Key Points: Significant traffic and severance concerns near Eddington. Additional education-related development must ensure safe routes. Village identity must not be overshadowed by adjacent	202254 (Girton PC)

<p>institutional uses. GPC Requests to the Local Plan: Require safe Active Travel routes for any new faculty or education-related proposal. Assess impacts on landscape and character. Avoid institutional expansion that urbanises Girton.</p>	
<p>The respondent supports the proposed policy, highlighting its alignment with their Strategic Estate Framework, which aims for effective land use, mixed uses on larger sites, improved public realm, active frontages, and reduced car parking.</p> <p>The respondent suggests that clarity is needed regarding the inclusion of sites outside the City Centre that are not listed as strategic University Sites, such as the Centre for Mathematical Sciences and Homerton, for the uses mentioned in paragraph 1. It is recommended that if paragraph 6 is intended to address these additional sites, this should be explicitly stated in the policy</p>	<p>202505 (University of Cambridge)</p>
<p>The respondent expresses concern over the differing terminology used in the policy, noting that Faculty Development and language schools are 'supported' while University developments are merely 'permitted', questioning the rationale behind this distinction. The respondent requests clarification on point (b) regarding language schools, specifically whether the policy applies only to non-local students, as the current wording lacks clarity on this aspect. The respondent highlights the absence of location considerations for language schools, suggesting that large language schools near residential areas could lead to conflicts due to noise from hostels accommodating students, recommending that the policy should address this potential issue.</p>	<p>204237 (Cambridge Past, Present and Future)</p>
<p>It is vital that university departments and colleges continue to engage with the expanded geography of Greater Cambridge. I welcome the two new college campuses at Eddington, testimony such forward thinking. Elsewhere this is some inertia, and a sustained wish to cram expansion into familiar spaces,</p>	<p>205255 (M Jones)</p>

<p>for example creating new college facilities close to existing dining facilities. This has nothing to do with 'demonstrable educational need' and rather more to do with a lack of imagination.</p>	
<p>The value of ARU to Greater Cambridge should be explored further in the supporting text. ARU strongly supports University development within the Eastern Gate and Grafton Area of Major Change. However, parts of the East Road campus may well deliver student accommodation, as well as faculty teaching/administrative facilities. On this basis, ARU considers that the extent of the ARU 'campus' should be defined within this policy and associated proposals map so that it can suitably inter-relate with the reading of other policies such as draft H/AH. Such an approach provides greater clarity when interpreting the Development Plan as a whole.</p>	203952 (Anglian Ruskin University)