Wellbeing and Social Inclusion Topic Paper

Greater Cambridge Local Plan

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

GREATER CAMBRIDGE
SHARED PLANNING

Topic Paper: Wellbeing and Social Inclusion

1. Introduction and purpose

1.1 This is one of nine topic papers produced to accompany the Proposed Submission (Regulation 19) consultation on the Greater Cambridge Local Plan. The topic papers are:

- Development strategy (with appendices)
- Site allocations
- Climate change
- Biodiversity and green spaces
- Wellbeing and social inclusion
- Great places
- Jobs
- Homes
- Infrastructure

1.2 All of the papers can be found on the Greater Cambridge Shared Planning website as part of the document library for this stage. The topic papers set out how each policy under the relevant Local Plan 'theme' has been updated following on from the Draft Local Plan stage. As such, the topic papers support and complement the Proposed Submission consultation document as they provide a detailed explanation of the basis for each policy.

1.3 The topic paper has a section for each policy which sets out:

- Policy context update – Any national or local policy changes, or other context changes which impact on the policy approach.
- New or updated evidence – Highlighting where new evidence has been prepared since the draft plan stage.
- Additional alternative approaches considered – If any additional reasonable

alternative approaches were identified to the policy.

- Proposed approach – changes that have been made to the approach in the Draft Loca Plan, and why they have been made.

1.4 Representations received at previous stages, including to the Draft Local Plan consultation, are summarised in the Statement of Consultation. This also includes responses to the issues raised.

1.5 The topic papers at previous consultation stages including those which accompanied the Draft Local Plan as are still available to view in our document library.

1.6 The Local Plan is supported by a wide range of evidence which can be found in our document library. Key supporting documents to the plan include:

- Statement of Consultation
- Sustainability Appraisal
- Habitats Regulations Assessment
- Equalities Impact Assessment (EQIA)

1.7 A draft NPPF was published for consultation on 16 December 2025 with comments required by 10 March 2026. The two Councils have submitted their response to this consultation. A final version of the NPPF has not yet been published at time of preparation of the Proposed Submission Local Plan. As a legacy plan, being prepared under the previous plan making system, transitional arrangements mean that the soundness of the Local Plan will be considered against the National Planning Policy Framework December 2024.

2. Wellbeing and Social Inclusion policies

2.1 The following proposed policies areas are addressed in this topic paper:

- WS/HD: Creating healthy new developments
- WS/NC: Meeting the needs of new and growing communities
- WS/CF: Community, sports and leisure facilities
- WS/CH: Cultural and creative hubs
- WS/MU: Meanwhile uses
- WS/IO: Creating inclusive employment and business opportunities through new developments
- WS/HS: Pollution, health and safety
- WS/PH: Public houses

3. Proposed Submission Local Plan update to WS/HD: Creating healthy new developments

Policy context update

3.1 In October 2025 the Leadership Team at Cambridge City Council approved the exploration of a Health in All Policies (HiAP) approach. The Council's Equalities Panel has subsequently approved the inclusion of HiAP wording in Equality Impact Assessments and the Equity Review.

3.2 Health in All Policies is about making sure decisions across areas like housing, transport, education and planning all share a common purpose to support better health and well-being. Different council teams and organisations work together, using tools like policies, strategies, projects and day-to-day practice, to understand how their decisions affect health and inequalities, and adapt their approach over time. A core aim is to improve equity by reducing health inequalities and recognising that people's health is shaped by factors like income, environment, and access to services. In practice, it means using tools like equality impact assessments, joined-up planning, shared data and collaboration to build health and wellbeing into everyday decisions across council services and partnerships.

3.3 The Adults, Health and Commissioning Strategy 2025-2028 supports how Cambridgeshire County Council will work to create a healthy, fair and sustainable Cambridgeshire. It outlines how they will continue to support adults with care and support needs, promote health and wellbeing, and deliver high-quality services that meet the needs of our residents. The Strategy's vision is for everyone in Cambridgeshire to:

- Live healthy, safe, and independent lives
- Access the right care and support, when and where they need it
- Feel included and supported in their community

3.4 The goals of the plan are to:

1. Improve Access. The Council will make it easier for everyone to get help, working with others to give better information about our services.

2. Focus on Safety. The Council want to keep everyone safe. Their services and partners will follow rules to protect people. They will help people to stay living in their homes as much as we can.
3. Increased Place Based Support. The Council will bring more services to local areas. This means people can get the help they need close to home.
4. Be Innovative. The Council will use new technology and find new and different ways to make our services better. This will help people to live on their own for longer.
5. Reduce Inequalities. The Council want everyone to use our services. They will work to remove things that stop people from getting the help they need.
6. Provide Enhanced Carers Support. The Council will help carers more. They will give them breaks and things they need to care for others. They want carers to be healthy and happy too.

New or updated evidence

Greater Cambridge Retail and Leisure Study Reg19 Interim Study Findings (2026)

3.5 **Greater Cambridge Retail and Leisure Study Reg19 Interim Study Findings** (2026) is an interim report compiled to inform future planning policy on town centre, retail and leisure matters in Greater Cambridge, together with a wider strategy for the future of the designated centres, up to 2045. A final version of the report will be issued later this year.

3.6 The report makes the following observations and recommendations regarding money lending/pay day loan shops, betting shops and hot food takeaways, as follows:

- The growth of money lending/pay day loan shops, betting shops and hot food takeaways has raised concerns amongst many local planning authorities and has resulted in a change to permitted development rights (PDR) to control the growth of these uses in town centres. These growth trends are not particularly evident in Cambridge, which only featured three betting shops, (para 3.44).

- There were 27 hot food takeaways in the city centre, 10.8% of all non-retail services, which is slightly below the UK national average of 15.0%. There was a slightly high proportion across the town and district centres surveyed (17.2%), with Mitcham's Corner in particular featured 8 units (26.7% of all non-retail services). This reflects the smaller number of units in the town and district centres and the local nature of hot food takeaways, (para 3.45).

- Non-Class E uses, including pubs, bars, hot food takeaways and other Sui Generis uses, can be controlled in the PSA, but could be encouraged to locate in other parts of the town centres where appropriate i.e. preventing breaks in active frontages, amenity issues (noise/smells), impact on the nature and character of the retail frontages, (para 7.23).

- Betting shops and hot food takeaways are Sui Generis uses that can still be controlled by planning policy and are not affected by changes to the Use Classes Order or Permitted Development Rights, (para 7.24).

- The perceived rise in proliferation of pay day loan shops, betting shops, hot food takeaways, and public houses, filling otherwise vacant spaces across town centres has raised concerns, with change to Permitted Development Rights enacted to control the growth of these uses in town centres. Paragraph 200 of the NPPF references the 'agent of change' principle, whereby a new development should not have a significant adverse effect on the operation of an existing business or community facility, (para 7.26).

- The qualitative audit of centres also allows for analysis of hot food takeaway uses within Greater Cambridge (56 units across the designated centres). This equates to 5.7% of all units, which is below the UK national average of 6.4%. There are, however, discrepancies across the centres and Cambridge City Centre shows a higher concentration of 10.8%. Whilst this is not a pressing concern at the current time, it does not indicate that there is a specific market need for such facilities, (para 7.29).

- Draft Policy WS/HD indicates that hot food takeaways should not be permitted where they are within 400 metres walking distance from the entrances/exits to primary and secondary schools. The objective of this policy criterion relates to public health concerns rather than the appropriate mix of uses. However, the over-concentration of hot food takeaways could also be managed in town centres and other areas, with the agent of change and other amenity-based policies appropriate to control such uses, (para 7.30).

Hot Food Takeaways and fast food outlets

3.7 A Policy Workshop on Integrating health and wellbeing into the Greater Cambridge Local Plan considered the scope for strengthening five health related policy areas relevant to the Greater Cambridge Local Plan. The Healthy Food Environment was one of the five policy areas.

3.8 Hot food takeaway development was highlighted as especially relevant for promoting better health through food systems. Discussion took place around:

- The need to be explicit in defining ‘hot food takeaways’ including clarity around whether healthy takeaways are included. How to define ‘healthy takeaways’.
- Whether the policy could address fast food takeaways and other takeaway food sources such as street-food vendors, dark kitchens and bubble tea shops.
- What can be done about existing takeaways.
- The importance of establishing which population groups are most at risk from exposure to hot food takeaways and the need for a coordinated approach involving an obesity charter, health and wellbeing and planning.
- The promotion of healthier hot food takeaways rather than a blanket refusal of all hot food takeaways, for example, the approval of menus.
- Concern that demand will simply transfer to other unhealthy sources of food such as convenience stores.
- The adoption of ‘Good Growth’ frameworks as a mechanism for integrating

sustainable and healthy food policies with economic growth.

- The integration of other metrics such as population density and vulnerability into the proposed buffer zone and extending the use of the zone to cover hospitals and nurseries.
- How planning policies could deal with the digital environment which can also contribute to social isolation.
- The vulnerability of Cambridge to fast food chains and the opportunities that changes of ownership and the closing of outlets could provide.
- Timed control of opening hours.
- The use of rates to manage the activities of food providers.

Gambling

3.9 The Gambling Act defines gambling as, "betting, gaming or participating in a lottery." Gambling comes in many forms, such as casino games and sports betting, but also includes bingo, lotteries, scratchcards and games machines etc. People can gamble in-person and online.

3.10 The Gambling Commission's Gambling Survey for Great Britain Annual Report (2024) found that nearly half (48 percent) of adults aged 18 and over participated in any form of gambling in the previous four weeks. Gambling participation was 28 percent when those who only participated in lottery draws were excluded.

3.11 Gambling is a recognised public health problem. A 2023 evidence review by the Office for Improvement and Disparities and Public Health England estimated 0.5% of the adult population in England have a gambling problem i.e. gambling "with negative consequences and a possible loss of control". It concluded that that harmful gambling should be considered a public health issue because it is associated with harms to individuals, their families, close associates and wider society.

3.12 On Britain's high streets in-person gambling can take several forms. The most familiar is betting shops which can include counter betting, Self-service Betting Terminals and Fixed-Odds Betting Terminals. Amusement arcades are captured in licensing definitions as Adult Gaming Centres and Family Entertainment Centres. The former are high-street outlets with gaming machines only available to over 18s including slots, casino-style games and fruit machines, the latter are larger arcades which cater for a range of ages.

3.13 Figures from the Gambling Commission Industry Statistics show that the number of betting shops in has fallen by over one third in 10 years from 8,995 in March 2015 to 5,825 in March 2025. Nationally, the number of adult gaming centres as fallen by 12% from 1,610 to 1,415. Family Entertainment Centres have fallen by 43% from 331 to 169.

3.14 The biggest changes in the gambling landscape over recent years have been a growth in the availability of remote gambling (particularly via the internet), the introduction of fixed odds betting terminals into most bookmakers, an increase in the number of casinos, an increase in the prominence of poker (both online and offline), and the introduction of online betting exchanges.

3.15 The Gambling Commission reports that the shift to online play has reflected changing lifestyles in general. Technology and globalisation have meant that gambling is no longer confined to opening hours and largely local events, but instead a 24/7 opportunity and global event-driven marketplace. However, retail remains a significant part of the sector. When lottery draws are excluded 18 percent of the participants in the Gambling Survey for Great Britain had gambled in person, compared with 15 percent online.

3.16 In terms of planning classifications, betting shops and amusement arcades are sui generis uses, which means they do not fall within a particular use class. This means that, if it is not already in that use, any new premise would require planning permission.

Gambling premises in Greater Cambridge

3.17 Using Licensing data from Cambridge and South Cambridgeshire, Figure 1 and Table 1 below show the distribution of gambling premises across Greater Cambridge and within Greater Cambridge's retail centres. The premises are split between the following categories:

- Betting Premises
- Family Entertainment Centres (often called amusement arcades – B3, B4, C and D machine categories)
- Adult Gaming Centres (often called amusement arcades – C and D machines categories)

3.18 In total, there are eleven betting shops in Cambridge and three amusement arcades. In South Cambridgeshire there are four betting shops and one amusement arcade. Using Census 2021 population data this is around 10,407 people per gambling premise in Cambridge and 32,424 people per gambling premise in South Cambridgeshire. Outside London the area with the highest population per betting shop is Glasgow (3,264). The highest in the East of England is Norwich (4,135).

3.19 In 2016, Cambridge City Council's licensing team (Local Area Profile) identified the presence of 16 betting shops and 2 adult gaming centres in the city. In the last 10 years there has therefore been a reduction in betting shops of approximately 31%, mirroring changes nationally. In contrast there has been an increase in the number of amusement arcades albeit this was just one new premise.

3.20 Figure 1 and Table 1 show the local of gambling premises across Greater Cambridge. Within Cambridge apart from an amusement centre at Cambridge Leisure Park and a betting shop on Chesterton High Street, all of the gambling premises are located within a designated retail centre, either Cambridge City Centre, a District and Town Centre or a Local Centre. There is a spatial concentration of premises within Cambridge city centre with more limited provision across smaller retail centres within the remainder of the city. The city centre Primary Shopping Area contains six gambling premises including two betting shops and one amusement arcade along Burleigh Street. A secondary cluster of betting premises is located along Cherry Hinton High Street (two betting shops).

3.21 In South Cambridgeshire gambling provision is dispersed and two of the five premises not located within a designated retail centre.

Figure 1: Gambling Premises in Greater Cambridge

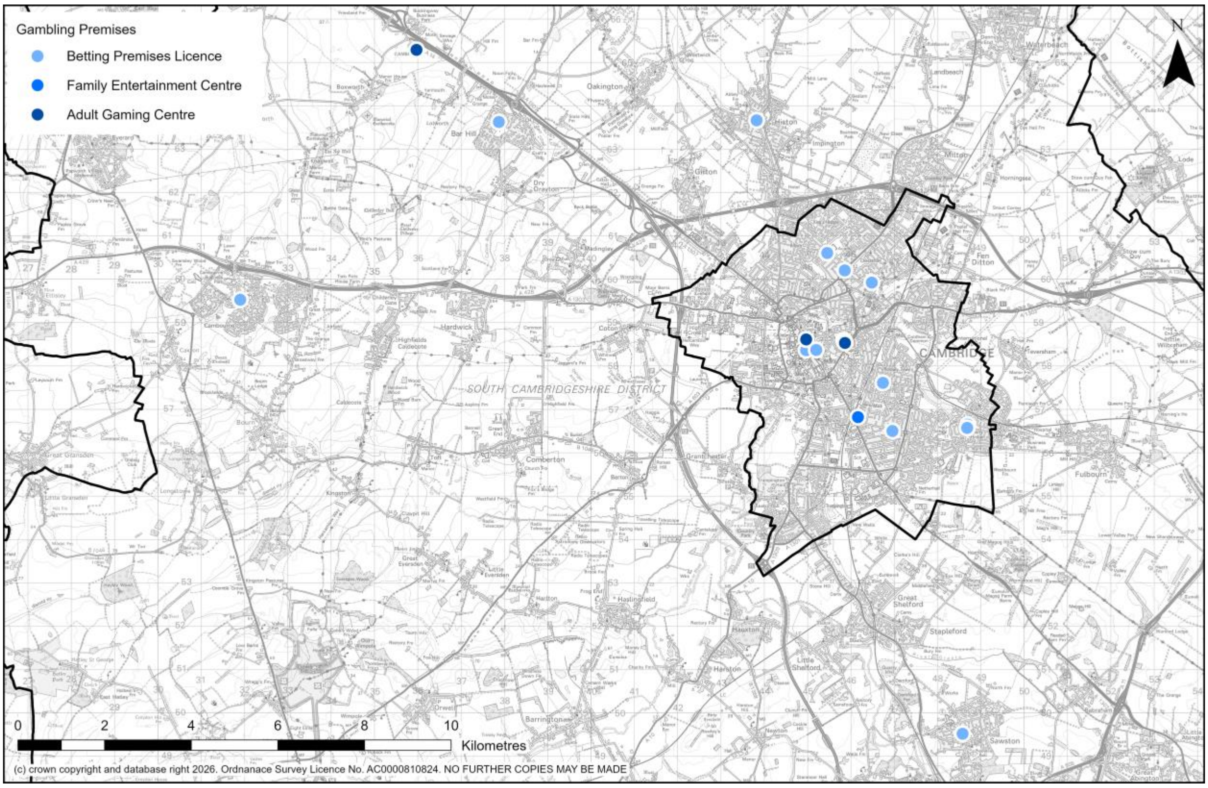


Table 1: Gambling premises in Greater Cambridge by retail centre, 2026

Retail Centre	No. betting shops	Number of amusement arcades
Arbury Court (District and Town Centre)	1	0
Cherry Hinton High Street (District and Town Centre)	2	0
Mill Road East (District and Town Centre)	1	0
Arbury Road/ Milton Road (Local Centre)	1	0
Cherry Hinton Road West (Local Centre)	1	0

Retail Centre	No. betting shops	Number of amusement arcades
Chesterton High Street, East Chesterton (Neighbourhood Centre)	1	0
Cambridge City Centre (Cambridge City Centre)	2	1
Fitzroy/Burleigh Street Area, inc The Grafton (Cambridge City Centre)	2	1
Cambridge Leisure Park	0	1
Cambourne (District and Town Centre)	1	0
Sawston (Local Centre)	1	0
Histon and Impington (Local Centre)	1	0
Bar Hill (Minor Rural Centre)	1	0
Cambridge Services A14	0	1

Source: Cambridge City Council and South Cambridgeshire District councils February 2026

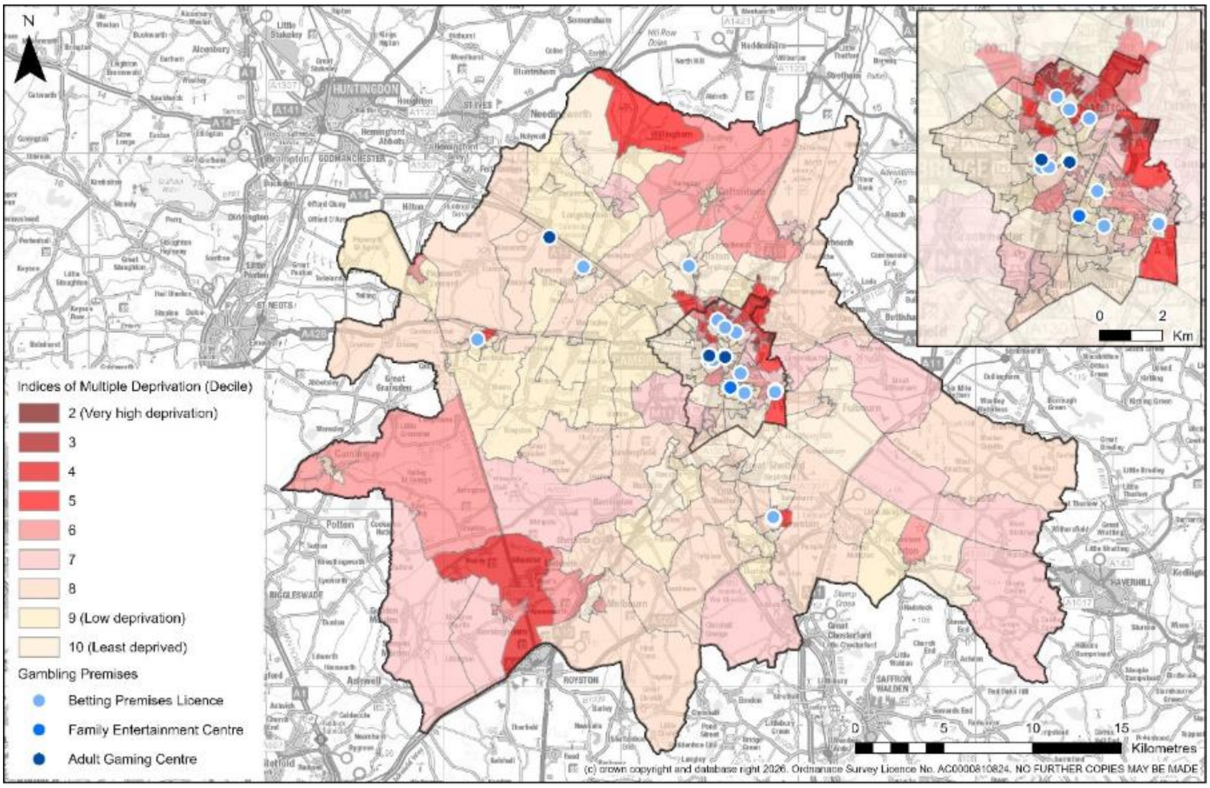
Gambling premises and deprivation

3.22 Figure 2 maps the location of gambling premises against the 2025 Indices of Deprivation by Lower Super Output Area (LSOA) across Greater Cambridge. The Indices of Deprivation measure multiple dimensions of neighbourhood deprivation at a small area level. Each area is ranked by the decile which they fall under. The most deprived areas are ranked as 1 i.e. they fall in the 10% most deprived areas in England. The least deprived areas are ranked as 10 i.e. they lie in the 10% least deprived areas of England.

3.23 In Cambridge, outside of the main retail and entertainment centres in the city centre, around the Grafton Centre, Mill Road and Cambridge Leisure Park, the majority of gambling premises lie within or close to areas of higher deprivation. King's Hedges (5), Abbey (5), Arbury (6) and East Chesterton are the lowest scoring wards in the 2026 indices of Deprivation. Abbey includes one LSOA that scores 2. All other LSOAs in the top 30% most deprived areas are in Abbey or King's Hedges ward. Arbury and East Chesterton both include areas that score 4.

3.24 In South Cambridgeshire, Bassingbourn is the most deprived ward by Decile Average (6) whilst the most deprived Lower Super Output Areas are in Cambourne (5), Histon and Impington (4), Melbourn (4), Milton & Waterbeach (5), Over & Willingham (5) and Sawston (5). Betting shops are located in Cambourne, Sawston and Histon although in the case of Histon this is not close to the LSOA in the top 40% of deprived areas.

Figure 2: Licensed gambling premises (2026) and Indices of Deprivation by Lower Super Output Area (2025) in Greater Cambridge



3.25 A report on the Geography of Gambling premises in Britain by the University of Bristol (Evans, J. and Cross, K. The Geography of gambling premises in Britain. University of Bristol/Standard Life Foundation) in 2021 found that a long-running trend of gambling premises being more common in deprived areas persists in Britain. As of November 2020, it found that 21% of gambling premises were based within the most deprived decile of areas in the country, compared to just 2% in the least deprived decile. By way of comparison, just 10% of supermarkets were located in the most deprived decile and 7% were in the least deprived decile.

3.26 The relationship with deprivation is stronger for 'family entertainment centres' (commonly called 'amusement arcades') – with 34% of such venues located in the most deprived decile. Bingo venues and adult gaming centres (AGCs) also have a strong relationship with deprivation, while it is slightly weaker (but still significant) for casinos and betting shops.

3.27 More recently, research by the BBC in December 2025 found that half of the UK's adult gaming centres are situated in its most deprived neighbourhoods. Analysis of Gambling Commission data showed that 664 of about 1,400 such premises are in the top 20% of deprived areas.

Gambling Harm

3.28 Gambling-related harm is defined as the negative impacts of gambling on individuals' resources, relationships, and health, affecting both people who gamble and those close to them (Wardle et al., 2018).

3.29 The harms associated with gambling identified in the Government's Gambling-related harms evidence review: summary (Jan 2023) can be:

- Financial harms to gamblers and their partners which can often be severe.
- Relationship harms including arguments, relationship strain or domestic abuse.
- Mental and physical health harms including a higher risk of dying including by suicide and higher incidents of self-harm.
- Employment and educational harms including Absenteeism, job turnover, withdrawal from education or reduced educational attainment.
- Criminal and anti-social behaviour harms with some studies identifying that crime that included theft and selling drugs were associated with gambling-related financial difficulties.
- Cultural harms with some studies showing that gambling- related harm is influenced by cultural norms, so some gamblers and their close associates experience additional harm like shame and isolation.

3.30 There are various ways to measure the prevalence of those experiencing problem gambling. The Gambling Survey for Great Britain (GSGB) uses the Problem Gambling Severity Index (PGSI), with the PGSI consisting of 9 items, with each being assessed on a four-point scale: ‘never’ to ‘almost always’. When scores to each item are summed, a total range from 0 to 27 is possible. Scores are grouped into the following categories:

- PGSI score 0: Representing a person who gambles (including heavily) but does not report experiencing any of the 9 symptoms or adverse consequences asked about.
- PGSI score 1 to 2: Representing low risk gambling by which a person is unlikely to have experienced any adverse consequences from gambling but may be at risk if they are heavily involved in gambling.
- PGSI score 3 to 7: Representing moderate risk gambling by which a person may or may not have experienced any adverse consequences from gambling but may be at risk if they are heavily involved in gambling.
- PGSI score 8 or more: Representing problem gambling by which a person will have experienced adverse consequences from gambling and may have lost control of their behaviour. Involvement in gambling can be at any level, but it is likely to be heavy.

3.31 The Gambling Survey for Great Britain Annual report (2024) found that among all participants in the survey, 8.8% had a PGSI score of 1 to 2, 3.1 % had a PGSI score of 3 to 7, and 2.7 percent had a PGSI score of 8 or more.

3.32 Of all adults who had gambled in the past 12 months, the most reported severe consequence was relationship breakdown due to own gambling (1.6%), whilst the most frequently reported potential adverse consequences (happening at least occasionally) were reducing spending on everyday items (6.7%), lying to family (6.0%) and using spendings or borrowing money (5.7%).

3.33 The Government’s Gambling-related harms evidence review: summary (Jan 2023) found that the most socio-economically deprived and disadvantaged groups in England have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm. It concluded that if there are no interventions to improve this situation, harmful gambling is likely to make existing health inequalities worse.

3.34 In 2024, Gambleaware published gambling harm local area data profiles from analysis produced by the OCSI. These profiles explored the estimated levels of gambling harm in local authorities by bringing together data estimated from the Annual Treatment and Support Surveys 2022-2024 (carried out by YouGov) using Multilevel Regression and Post-stratification (MRP) modelling.

3.35 The diagrams and tables below are taken from the report. For Cambridge they show that whilst estimates of the levels of low-risk gambling are similar in Cambridge and Great Britain, estimates of the levels of moderate and problem gambling are higher than the Greater Britain average. The estimates of the levels of high risk gambling are almost double.

3.36 For South Cambridgeshire, all levels of problem gambling are below the Great Britain average.

Figure 3: People gambling with any negative consequences (PGSI 1-2, 3-7 and 8+) by PGSI score in Cambridge

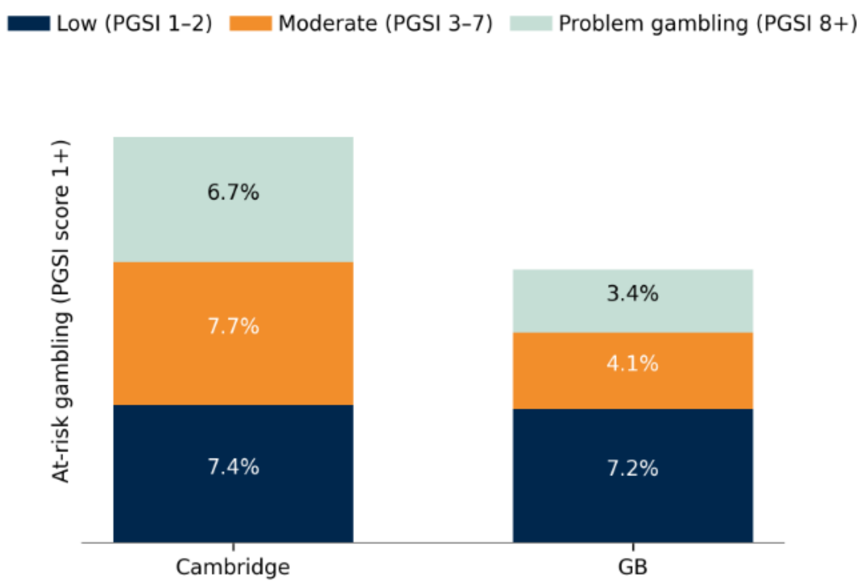
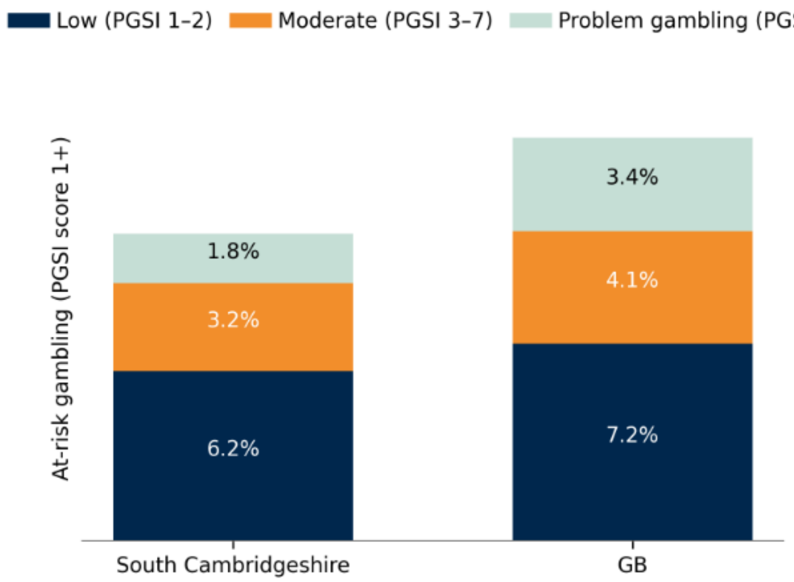


Figure 4: People gambling with any negative consequences (PGSI 1-2, 3-7 and 8+) by PGSI score in South Cambridgeshire



3.37 The OCSI data profile for Cambridge highlights the demographic characteristics of Cambridge that lead to the model of relatively higher levels of ‘problem gambling’ (i.e. a PGSI Score of 8+) in the area. Problem gambling is more prevalent in an area with these characteristics:

- Younger people (aged 18-34): 8.5%, compared with 3.9% across all age groups.
- People from Black, Asian and other Minority Ethnic (BAME) groups: 6.6%, compared with 3.4% for those of White ethnicity.
- People who are unemployed or economically inactive: 3.4%, compared with 3.9% across England.
- Full-time students (linked to the higher prevalence among young adults): 5.1%, compared with 3.9% across all adults in England.
- People not in a relationship: 4.3%, compared with 3.0% for those in a relationship.

3.38 The figures for Cambridge identified in the Gambleware local area estimates can be found in Table 2:

Table 2: Demographic characteristics of Cambridge compared to England

Location	Aged 18-34	Unemployed / Inactive	BAME Groups	Full-Time Student	Not In Relationship
Cambridge	39.7%	30.7%	25.5%	5.2%	67.1%
England	21.5%	20.2%	17.6%	2.2%	55.0%

Source: Gambleaware

Student Gambling

3.39 It could be posited that the demographic characteristics of Cambridge that suggest a population with a greater proportion of problem gamblers may be as a result of the high proportion of students in the area. They are more likely to be 18-34, economically inactive, from different BAME groups, not in a relationship and, of course, a student.

3.40 Censuswide produce a Student Gambling Survey for YGam and GamStop2. A sample of 2,000 students from UK universities participated in the survey, which asked students about their gambling activities, spending habits, influencers, consequences, funding sources, and help-seeking. Students also completed the short-form Problem Gambling Severity Index, a standardised tool for assessing at-risk behaviour in relation to gambling. The finds indicate that:

- 60% of students gambled in the past 12 months; a decrease from 71% in 2022.
- 48% of students who gamble said they had gambled more than they could afford. Among students who gamble, the average weekly loss is £35.25, with 15% losing £50 or more per week to gambling.
- 46% of students who gamble said gambling has had an effect on their university experience, including trouble paying for food, attempting to access hardship loans and missing social activities and work deadlines.
- 1 in 16 (6%) reported that they have deferred or considered dropping out of university due to their gambling
- 28% of students who gamble are at ‘moderate risk’ of harm, and 21% are in the ‘problem gambling’ category.

3.41 Table 3 below, taken from the report shows the types of gambling undertaken by the students in the survey. 6.75% of responders used a high street bookmaker, 9.6% used machines in amusement arcades and 7.8% used high street fruit machines. Those that did use high street premised spent a lot of time in them. Table 4 shows that the average (mean) the number of days in a year that respondents who gamble reported using High Street Bookmakers was just under 100 days. For machines in amusement arcades it was a similar figure and high street fruit machines was approximately 90 days.

Table 3: Participation in Gambling by students

	All	Male	Female	Non-binary	Other
Number of Responses	2000	1002	961	32	5
I do not gamble	38.55%	30.74%	45.89%	56.25%	80.00%
National Lottery	25.40%	25.75%	25.29%	21.88%	0.00%
Online sports bet	22.90%	32.34%	13.74%	6.25%	0.00%
Online bingo	16.05%	14.67%	17.59%	15.63%	0.00%
Online casino games	15.85%	20.26%	11.76%	3.13%	0.00%
Online scratch cards	15.05%	15.87%	14.46%	9.38%	0.00%
Online fruit machines	11.45%	14.87%	7.80%	15.63%	0.00%
Online poker	10.55%	14.27%	6.76%	9.38%	0.00%
Esports	9.75%	14.97%	4.58%	3.13%	0.00%
On machines in amusement arcades	9.60%	10.18%	9.05%	9.38%	0.00%
High street fruit machines	7.80%	11.28%	4.27%	6.25%	0.00%
Private bets	7.40%	10.28%	4.47%	6.25%	0.00%
High street casinos	7.25%	10.48%	3.95%	6.25%	0.00%
High street bookmakers	6.75%	10.28%	3.33%	0.00%	0.00%
On-course horse/dog racing	5.65%	6.99%	4.27%	3.13%	20.00%
Prefer not to say	1.75%	1.50%	2.08%	0.00%	0.00%
Other (please specify)	1.00%	0.90%	1.04%	3.13%	0.00%

Source: Censuswide Student Gambling Survey

Table 4: Gambling days per year

	Mean gambling days per year				
	All	Male	Female	Non-binary	Other
Number of Responses	1194	679	500	14	1
Online fruit machines	108.09	120.89	83.93	88.94	NA
High street bookmakers	99.67	111.32	62.14	NA	NA
Online poker	99.28	106.30	87.28	24.70	NA
High street fruit machines	98.42	105.07	83.60	26.50	NA
Online casino games	94.25	104.75	75.75	52.00	NA
Online sports bet	91.29	105.46	56.52	91.00	NA
High street casinos	90.92	103.22	61.52	3.50	NA
Online bingo	87.78	113.13	66.99	44.90	NA
Private bets	86.43	90.74	78.90	26.45	NA
Esports	72.34	75.81	61.68	20.80	NA
Oncourse horse/dog racing	70.45	95.49	27.68	130.00	12.00
Online scratch cards	68.34	84.84	50.69	11.37	NA
Other (please specify)	59.99	76.67	45.77	52.00	NA
National Lottery	54.28	66.67	39.74	102.19	NA
On machines in amusement arcades	53.38	78.83	24.54	24.70	NA

Source: Censuswide produce a Student Gambling Survey

Existing controls available to local authorities

3.42 The Gambling Act (2005) sets out the requirements for legal gambling participation. The Gambling Commission and licensing authorities share regulation of gambling through licensing, policy and local risk assessment.

3.43 Local Authority Licensing Teams have a duty under the 2005 Act to licence premises where gambling is taking place through the issuing of Premises Licences. The location of the premises in terms of the licensing objectives is relevant to councils' decision making on licensing premises.

3.44 The Statement of Principles for both Cambridge and South Cambridgeshire, as per the guidance, in its Statement of Principles (March 2025 – March 2028) the councils state that it will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder in its consideration of the location of premises.

3.45 For regulatory purposes it is assumed that ‘vulnerable persons includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs”.

3.46 Cambridge’s Local Area Profile includes Ward breakdowns of schools, place of worship and crime and disorder. It also analyses population, health and well-being, deprivation and economic well-being across the city. For South Cambridgeshire, the Statement says there no need for a Local Area Profile due to the low number of gambling outlets and the rural nature of the area. Neither authority have a specific policy in place with regards to areas where gambling premises should not be located.

3.47 On 29 April 2026 Royal Assent was given to the English Devolution and Community Empowerment Act which enables Gambling Impact Assessments to be prepared by licensing authorities to address the proliferation of gambling shops on the high street. It also allows councils to restrict new gambling shops in specific areas based on the findings of the assessment. Specifically, it states that:

> “A licensing authority may publish a document (“a gambling impact assessment”) containing a statement that the licensing authority consider that the grant of any relevant licence, or of any further relevant licences, in respect of premises in one or more parts of their area described in the assessment (the “affected part or parts”) is not likely to be reasonably consistent with one or more of the licensing objectives because of—
>
> (a)the cumulative impact of relevant licences in respect of premises in the affected part or parts, or
>
> (b)other reasons which relate to that licensing objective, or those licensing objectives, and to the affected part or parts.
>
> …”

Additional alternative approaches considered

Local plan policy examples

3.48 Planning policies that manage the prevalence of gambling premises can be found in local plans across the UK. A sample of policy examples are listed in Appendix 1.

3.49 There is variation in the gambling premises that are covered by policies. In some areas, such as Newham and Lambeth only betting shops are included in the policy. In other areas policies are more broadly drawn. Policies in Doncaster and Sandwell cover gambling activities and alternative financial services incorporating betting shops, amusement arcades, pay day loan units and pawnbrokers.

3.50 Of the policies reviewed, no one policy is the same with the individual elements tailored to individual area. There are however some common tools:

- Limitations on concentrations in individual retails centres by:
    - Limiting the number of premises that can be adjacent/consecutive;
    - Specifying that there must by a separation between premises; and
    - Limiting the number or percentage of premises in each retail centre.
- Limiting the numbers of premises within areas by:
    - Specifying the number of premises across an area e.g. no more Than 3 units within a 400 metres of each other; and
    - limiting units based on overlapping of catchment areas.
- Limiting premises in retail areas for reasons of centre vitality and viability and the amenity of residents and town centre users in terms of anti-social behaviour and crime and disturbance.
- Specifying that a retail unit must be vacant for 12 months and marketing having taken place.
- Specifying that the use must generate additional footfall in the retail area.

3.51 In some areas the policy includes variations between types of retail centre, for example, a separation of units is specified in Lambeth's district centres whilst only one unit is allowed in its local centres. Some policies split their policy between the types of uses, for example, Brent has different limits on the proportion of betting shops and amusement arcades allowed within a centre.

Additional alternative approaches considered

3.52 Other alternative approaches include:

- No gambling policy – not considered reasonable as evidence has identified the health risks associated with gambling.
- A more area focused policy for restricting gambling premises was considered linked to areas of higher deprivation, however further evidence would be required to understand the use of gambling premises within local areas and it was considered that the new Gambling Impact Assessments would provide a suitable alternative tool.

Proposed approach

3.53 The following amendments have been made to the Draft Plan policy:

- Part 2 of the policy has been altered to provide clarity that it is capturing policies elsewhere in the Plan. Individual elements and the supporting text have also been altered to reflect individual themes within the Regulation 19 Plan.
- In part 3 "...as appropriate, to take into account how they can contribute to the aims and objectives of those strategies" has been replaced by "and seek to contribute to the aims and objectives of those strategies". Reflecting the importance of placemaking in the health outcomes of individuals and communities, this alteration has been made to give all developers of major sites a more proactive requirement to consider how their development can contribute to the aims and objectives of local and regional primary care and other health strategies.

- To provide clarity, and reflect evidence on harm, betting shops, amusement arcades, hot food takeaways and fast food outlets are included in uses that have a significant impact on health and wellbeing and therefore require a Health Impact Assessment.
- “And” has been added to part 5 (previously part 4) to clarify that both a. and b. must be demonstrated by proposals requiring a full Health Impact Assessment.
- Alterations have been made to the hot food takeaway and fast food outlets element of the policy to reflect the fact, in some circumstances, hot food takeaways can play a role in providing affordable, accessible and/or healthy food. “Normally” has been added to part 6 and a further element has been added to part 7 which allows that in exceptional circumstances a concentration of hot food takeaways and fast food outlets may be acceptable. The addition of Part 9 provides the opportunity for the councils, working with businesses, to improve the healthiness of takeaway and fast food offers.
- Additions have been made to the supporting text to explain the reasoning behind the new elements of the policy and explain “Healthy Catering Principles”.
- Further changes to the Hot Food Takeaways and fast food outlets policy are confirmation that 400m buffer zone around schools, colleges and youth centres should be measured from site boundaries and the replacement of “over concentration” with “harmful concentration”. These changes seek provide clarity on the purpose and implementation of the policy.
- On review, it was considered that where a village or parade of shops have a public house and a convenience shop, the wording of Part 8 of the policy would allow one of these to become a hot food takeaway or fast food outlet. The new wording seeks to ensure that in these circumstances both premises would be retained.
- In the absence of a national definition of fast food outlets, new supporting

text seeks to clarify the distinction between the two uses.

- Whilst the evidence outlined above suggests that the imperative to restrict gambling premises in Greater Cambridge is not high with numbers falling nationally and locally, the low current levels of premises compared to other areas coupled with the high risks of problem gambling in Cambridge, suggest that were demand to return, even a limited demand, this could contribute to undermining the health and wellbeing of individuals in the area.
- A policy to limit new gambling premises to designated centres and to limit concentrations within individual designated centres is considered to be a proportionate response to manage this risk. The requirement for a health impact assessment for gambling premises outlined above would also ensure that applicant considers how any harms arising from gambling-related activity can be minimised and preferably avoided.
- Several alterations have been made to the supporting text to improve its grammar and readability.

4. Proposed Submission Local Plan update to WS/NC: Meeting the needs of new and growing communities

Policy context update

South Cambridgeshire District Council Corporate Plan 2025-2030

4.1 The vision for South Cambridgeshire is for a fairer, kinder, and greener South Cambridgeshire, where all residents will be equal partners in their communities. To aspire to create a better district to the benefit of everyone in our communities. The Council recognises the many challenges that face the district and will continue to work to overcome these to help realise its full potential.

4.2 South Cambridgeshire priorities are as follows:

- Healthy and supported communities
- Sustainable homes and vibrant places
- Being green to our core
- Helping businesses to thrive in South Cambridgeshire
- Financially secure and fit for the future

4.3 The ambition of the 'Healthy and supported communities' priority is to create a district where people feel safe, supported, and confident in their communities.

4.4 As part of the Corporate Action Plan, the Action Plan continues to outline the work to deliver new community facilities at Northstowe. This includes the new permanent community centre for phase one – the Unity Centre – (now open), helping ensure Northstowe has new, state of the art spaces to support its growing and thriving community.

4.5 The Council also intends to provide rental space for businesses, including via its commercial premises and space for start-ups and small businesses at its South Cambs Hall office building. Through the Visit South Cambs website, there will also be continued promotion of the district's high streets, events and businesses.

Corporate plan 2022-27: our priorities for Cambridge

4.6 Cambridge City Council's corporate plan for 2022 to 2027 sets out our four key priorities for the city over the next five years.

- Leading Cambridge's response to the climate and biodiversity emergencies and creating a net zero council by 2030
- Tackling poverty and inequality and helping people in the greatest need
- Building a new generation of council and affordable homes and reducing homelessness
- Modernising the council to lead a greener city that is fair for all

4.7 The Council will work with voluntary and community groups and local employers to help strengthen local communities, and we will work cooperatively with partners to address the underlying issues. And we will seek to listen to and work with our communities, making sure that we work in partnership with residents rather than simply doing things for them.

Cambridge City Council Community Wealth Building - Strategy and Approach (March 2024)

4.8 Cambridge City Council's community strategy is driven by their Community Wealth Building Strategy, which replaced the previous anti-poverty strategy. The core vision is "One Cambridge, Fair for All", focusing on tackling poverty, creating a fairer economy, empowering local communities, and keeping wealth circulating locally.

4.9 The City Council has had an anti-poverty strategy since 2014, which has focussed on improving the standard of living and daily lives of residents in Cambridge who are experiencing poverty; and helping to alleviate issues that can lead households on low incomes to experience financial pressures. Over the past 10 years, this approach has been gradually evolving and forms part of the City Council's new Community Wealth Building Strategy, which will run from April 2024 onwards, when the current anti-poverty strategy ends.

4.10 The Community Wealth Building Strategy will outline the City Council's approach to reducing poverty and inequality in Cambridge and supporting a more inclusive, fair and sustainable economy. The strategy takes a broad definition of community ‘wealth’, one that addresses economic inequality alongside other forms of wealth, including building human, social, knowledge, physical, natural and institutional ‘capital’ - all these forms of capital are needed to create sustainable prosperity.

4.11 The Community Wealth Building approach will focus on four areas of work:

1. **Using the Council’s resources, assets and powers**
    - Procurement and spending power
    - Buildings and land assets
    - Voluntary sector grant funding
    - Employment practices
2. **Building an inclusive and sustainable economy**
    - Encouraging businesses and anchor institutions to adopt good
    - Employment and procurement practices
    - Local business and social enterprise support
    - Influencing learning and skills provision
3. **Building community power**
    - Working collaboratively with communities
    - Giving individuals agency and empowering communities
    - Focusing on strengths and potential that exist in communities
4. **Taking a holistic, systems-based approach**
    - Working collaboratively with a range of stakeholders, including communities, partner organisations and businesses

4.12 To summarise, as part of our Community Wealth Building approach, the Council would make the following key asks of local partners:

1. **Spend and procurement** – to consider how to maximise social value in procurement and to develop local businesses and social enterprises into the supply chain.
2. **Workforce and employment** – to adopt positive employment practices, including a commitment to pay the Real Living Wage, secure employment, good development and progression opportunities, recruiting people from local communities, and providing high quality training and apprenticeships that meet current and future skills gaps.

3. **Finance and investment** – to invest in local initiatives to address inequality (through the Greater Cambridge Social Impact Fund or company Environmental Social and Governance (ESG) programmes)
4. **Buildings, land and assets -** to consider opportunities to use or manage building and land assets for community benefit, including opening up assets to community access or use and to create social value.
5. **Empowering communities** – to work with and help empower local communities to develop solutions to local problems. 6. Community and voluntary sector support – to help strengthen local community and voluntary organisations by aligning funding opportunities with other partners and supporting skilled volunteering by staff.
6. **Collaborative working** – working together as partners and stakeholders to address poverty and inequality and ensure all residents of Cambridge can benefit from the city's prosperity.

New or updated evidence

4.13 **Greater Cambridge Burial Study (Interim)** (2026) sets out a review of funerary legislation, policy and trends followed by the baseline position in terms of burial spaces and funerary facilities in Greater Cambridge, as well as providing an understanding of the area's current demographic. The study also considers the current needs and capacity in addition to identifying both opportunities and constraints for disposition post-death. Future demographic projections and mortality forecasting are also provided along with the study's findings and recommendations, establishing future needs. The final section considers potential approaches for ensuring that existing and future funerary provision is delivered as needed and sustainably managed.

4.14 The overall estimated shortfall in burial spaces during the Plan Period across Greater Cambridge is approximately 3,120. These figures are preliminary and the final version of this study will set out a finer grain analysis about the finer grain analysis about the geographical distribution of this shortfall. The shortfall identified is not focussed on one area but spread across Cambridge and at new settlements separated from the city. The report takes into account the needs of different faith groups and the provision of their disposition post-death.

4.15 The interim report also recommended the additional need created by new settlements should be provided within them, as part of the essential infrastructure provided by the developers. The number of burial spaces provided should extend beyond the expected requirement of the Plan Period to truly meet the needs of the new communities for a reasonable period of time. If the ground/water conditions are not suitable for onsite provision, in accordance with legislation and the Environment Agency’s guidance, developers should complete their own assessments to identify sites for locating suitable burial provision in an alternative location and to provide sufficient capacity at that location. This may include neighbouring parishes where more suitable burial ground conditions may exist.

4.16 **Greater Cambridge Community Infrastructure Study** (2026) provides a practical planning tool for deciding what community infrastructure new development should provide or fund across Greater Cambridge.

4.17 The study focuses on the spaces, facilities and local assets that help people meet, organise, access support and take part in community life. This includes community centres, village halls, parish halls, libraries, faith spaces with active community use, youth spaces, women’s and specialist support spaces, schools with genuine community use, and other stable community-serving assets.

4.18 The study brings together mapped asset-location data, community facilities evidence, workshop evidence, officer interviews, existing resident survey evidence, demographic and growth evidence, standards and comparator evidence, and draft planning evidence.

4.19 The main findings of the report include:

- Greater Cambridge has a wide community infrastructure network, with many community-facing assets already recorded.
- Mapped asset-location data records indicate 223 geolocated community-facing or contextual entries in Cambridge City and 517 in South Cambridgeshire. These records show distribution, clusters and possible gaps.

- Workshop and officer evidence highlighted gaps between buildings being present and provision working well, including visibility, welcome, affordability, booking, youth use, kitchens, storage, transport access, management capacity and revenue.
- Community facilities evidence shows that growth can place additional pressure on existing assets and stewardship arrangements, so new development needs to plan for early usable space, improvements to existing facilities, long-term management and clear routes for contributions.
- Cambridge City has a dense community infrastructure network comprising of a network of Council-supported community-centres alongside community-led provision. The city also has clear local gaps and growth pressures, especially where existing neighbourhoods sit close to major development areas such as Cambridge East, the eastern fringe and southern institutional growth locations.
- South Cambridgeshire has a dispersed network of village, parish and growth-area provision. Many places rely on village halls, parish facilities, faith spaces, schools and volunteer-led management. The South Cambridgeshire community facilities evidence supports a 129 square metres per 1,000 population benchmark and shows that quality, accessibility, running costs and local stewardship are as important as the headline amount of floorspace.
- Major growth locations need early, visible and usable provision. New settlements, strategic allocations, large urban extensions and employment-led campuses need Community Plans, clear phasing, on-site and off-site decisions, safeguarded capacity, youth-capable space, kitchen and storage capability, revenue support and long-term stewardship.
- Community infrastructure needs to work for people who may face barriers to access. This includes young people and teenagers, older people, disabled people, carers, low-income households, non-drivers, women and girls, LGBTQIA+ communities, faith communities, new arrivals and groups that may need safe or trusted meeting space.

4.20 The study recommends the use of Community Plans as the main mechanism for larger developments and locally complex proposals. The Community Needs Assessment should sit inside the Community Plan, alongside the proposed provision, engagement, phasing, funding, stewardship, management, monitoring and review arrangements.

4.21 The study supports the use of proportionate Community Plans for strategic sites, larger residential developments, larger employment developments and other proposals where local context, cumulative growth or pressure on existing provision creates material community infrastructure issues.

4.22 **Greater Cambridge Cultural Infrastructure Strategy (Interim) - Stage 2** (2026) identifies how planned growth in Greater Cambridge necessitates and can support the vision and priorities for cultural infrastructure established through the Greater Cambridge Cultural Infrastructure Strategy Stage One, which were based on an extensive audit of existing infrastructure provision, engagement with key stakeholders in cultural infrastructure delivery, and community involvement.

4.23 The Stage 2 report makes the case for cultural infrastructure as a core component of social and economic infrastructure, essential to delivering sustainable, inclusive and high-quality places and therefore the need to provide and maintain infrastructure through new development to support planned development and mitigate the impact of development.

4.24 The report also identifies the need for contributions through S106 agreements, in addition to wider funding mechanisms, to deliver the necessary cultural infrastructure to support Greater Cambridge's economic and population growth.

4.25 See also section under Policy WS/NC: Meeting the needs of new and growing communities.

Additional alternative approaches considered

4.26 None

Proposed approach

4.27 The following amendments have been made to the Draft Plan policy:

Burial Grounds, Cemeteries and Crematoriums

- Paragraph 10 has been added to explain the circumstances that need to be satisfied proposals for new cemeteries, burial grounds, natural burial sites, supporting buildings and extensions to existing facilities including crematoriums will normally be supported.
- Additional supporting text provided to support the delivery of new burial grounds, cemeteries and crematoriums.

Community & Cultural Infrastructure

- The sub-heading Indoor Community Facilities has been amended to include Indoor and Outdoor Community and Cultural Facilities.
- Paragraph 6 has been amended to explain the metrics that should be applied by applicable developments as part of the process of calculating their contribution towards community and cultural infrastructure.
- It also requires applicable developments to submit Community and Cultural Plans as part of the planning application process to establish a robust, evidence-led and locally responsive approach for their provision and long-term viability.
- Additional supporting text provided to support the delivery of community and cultural plans.

Leisure routes

- Paragraph 9 has been added to require new development to provide or contribute towards leisure routes, suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside.
- Additional supporting text provided to support the delivery of leisure routes.

5. Proposed Submission Local Plan update to WS/CF: Community, sports and leisure facilities

Policy context update

5.1 See section under Policy WS/NC: Meeting the needs of new and growing communities.

New or updated evidence

5.2 **Greater Cambridge Indoor Sports Facility Strategy (ISFS)** (2026) has been developed in accordance with Sport England's prescribed methodology and builds on the work completed by the ISFS 2016 version which planned up to 2031. The updated version plans for the period up to 2031 and from 2032 to 2045, while acknowledging some developments will not be completed until after 2045.

5.3 The latest ISFS states how the scale of planned housing growth to 2045 will generate increased demand for sport and leisure facilities and there will therefore be a need to develop new swimming pools, sports halls, fitness facilities and a range of other leisure facilities. All strategic housing sites, and large employment sites, should be collecting developer contributions towards the provision of both new and improved indoor sports facilities.

5.4 The new facilities will be funded through both off and on-site s106 contributions. However, it is also likely that other funding will be needed given the increasing cost of sports infrastructure.

5.5 **Greater Cambridge Playing Pitch Strategy (PPS) (Interim)** (2026) has been developed in accordance with Sport England's prescribed methodology and builds on the work completed by the PPS 2016 version which planned up to 2031. The updated version plans for the period up to 2031 and from 2032 to 2045, while acknowledging some developments will not be completed until after 2045.

5.6 The PPS provides an up-to-date analysis of supply and demand for playing pitches (grass and artificial) and its current and future demand in the local authority. The strategy and the evidence base upon which it is based is delivered using national guidance and facility insight from specific Governing Bodies of Sport. The assessment focusses on natural and artificial facilities used by football; rugby union, cricket; and hockey.

5.7 Within these sports, the strategy seeks, as far as is practicable, to include consideration of all forms of play, whether: club and league based (formal) competitions and training; less formal programmed forms of the respective sports (e.g. turn up and play products such as Rush Hockey, walking football, All Stars Cricket, and Touch Rugby); and informal and un-programmed play by groups of residents, workers, students, school friends (out of school).

5.8 The PPS provides a holistic analysis of sports facilities across the Study Area. This will lead to a comprehensive set of recommendations for the future development of leisure / health and wellbeing provisions, in line with the needs of local residents.

- **Greater Cambridge Outdoor Courts & Rinks Strategy (OCRS) (Interim)** (2026). The OCRS has been developed for Greater Cambridge and provides an assessment of outdoor tennis, padel outdoor netball and outdoor bowls facility provision in the area, following Sport England's Assessing Needs and Opportunities guidance. This assessment was undertaken in collaboration with the Lawn Tennis Association (LTA), England Netball (EN), Bowls England (BE) and British Crown Green Bowling Association (BCGBA).

Additional alternative approaches considered

5.9 None

Proposed approach

5.10 The following amendments have been made to the Draft Plan policy:

- Paragraph 1, an additional criterion has been added requiring all proposals (excluding minor applications) to facilitate community access to new or enhanced facilities through measures such as a community use agreement, unless it can be demonstrated that it is not feasible.

- Paragraph 7 has been added to require developers prepare, where appropriate management and maintenance strategies, approved by the Local Planning Authorities. These will ensure the facility's or service's robust and effective implementation, adoption and maintenance in the long term.
- Additional supporting text provided to include the use of Sport England's community use agreement templates and guidance. It also clarifies how facilities should only be counted towards meeting public need where there is secured, affordable and long-term legally binding community access agreement in place.

6. Proposed Submission Local Plan update to WS/CH: Cultural and creative hubs

Policy context update

6.1 See section under Policy WS/NC: Meeting the needs of new and growing communities.

New or updated evidence

6.2 See section under Policy WS/NC: Meeting the needs of new and growing communities.

Additional alternative approaches considered

6.3 None

Proposed approach

6.4 The following amendments have been made to the Draft Plan policy:

- The policy approach has not been changed, rather it has been slightly amended to remove duplication of ‘networking’ in paragraph 1 and criteria lettering in paragraph 2.
- Paragraph 2 has been amended, removing reference to “rather than duplicate” in the fifth criterion.

7. Proposed Submission Local Plan update to WS/MU: Meanwhile uses

Policy context update

7.1 None.

New or updated evidence

7.2 In February 2026 Cambridge Ahead's Youth Advisory Committee published Temporary Space, Lasting Impact: Meanwhile Use as Infrastructure for Placemaking. The report explains the economic, social & community and environmental benefits and the strategic value that meanwhile uses can bring. It highlights the practical ways in which meanwhile uses can help tackle inequality and support Cambridge City Council's Wealth Building Strategy. Turning vacant buildings into affordable spaces which can be used by local businesses and community groups, gives entrepreneurs a more affordable way to test their ideas, and provides venues where residents can come together for community activity such as to tackle local issues or strengthen social cohesion. The case studies provided in the report provide some useful practical learning including:

- Featuring meanwhile use opportunities early in discussions around placemaking, as an infrastructure cost at the outset and as fundamental to the development of the place is important to avoid 'tokenistic' or 'bolt on' meanwhile use projects.
- Utilising vacant retail units through meanwhile use enables community organisations and early-stage start-ups to pilot ideas in high-footfall, accessible locations, helping to maintain day-to-day vibrancy in shopping centres while laying the groundwork for future longer-term occupation.
- Meanwhile use can emerge organically when landlords engage early with local community groups. Offering short-term access to vacant units allows organisations to pilot ideas, build community support and keep sites active while redevelopment plans progress.

7.3 The report outlines a series of considerations for good meanwhile use including "Embedding meanwhile use into local planning policy and practice would encourage asset owners to plan for it from the outset as part of their placemaking strategy."

Additional alternative approaches considered

7.4 None

Proposed approach

7.5 The following amendments have been made to the Draft Plan policy:

- The term "large-scale" has been removed from Part 1 of the policy and the sentence adjusted to accommodate this change. This acknowledges that meanwhile uses can bring benefits to different scales of sites and buildings.
- Part 2 of the policy has been revised to require all phased major development to submit an appropriate Meanwhile Use Feasibility Study, and, if feasible, an appropriate Meanwhile Strategy. This recognises the significant positive impacts that meanwhile uses can bring to new communities.
- Changes have been made to the supporting text to make it read better and to highlight the role of meanwhile uses in providing a continuity of provision during redevelopment. A new paragraph highlights the importance of early discussions to maximise the benefits of meanwhile uses.
- A newly introduced paragraph to the supporting text outlines the expectations of what would be included in a meanwhile use strategy. This will help applicants to understand the councils' expectations for a strategy and enable the effective use of resources in its preparation and sign-off.

8. Proposed Submission Local Plan update to WS/IO: Creating inclusive employment and business opportunities through new developments

Policy context update

8.1 Get Cambridgeshire and Peterborough Growing, the Cambridgeshire and Peterborough Combined Authority Local Growth Plan approved in October 2025, states that its growth ambition indicates that by 2035 we will need significant numbers of additional workers qualified to degree level.

8.2 "A key challenge for the C&P region will therefore be ensuring that our residents have access to high-quality further education (FE) and higher education (HE) provision, to ensure that businesses within our region have access to a pipeline of talent. This will necessitate addressing existing barriers and challenges our residents face, particularly within specific areas of C&P, as well as ensuring that there are a range of pathways for progression to higher-level skills. Of critical importance will be the role our FE colleges and Independent Training Providers play in the delivery of vocational and technical learning, particularly the delivery of Level 3 qualifications, the demand for which will increase with the evolving specialisation of our economy.

8.3 Without suitable and accessible pathways to skills attainment within our region, our residents will not be able to fully benefit from the higher wages and access to good jobs which will be driven by Growth within our economy."

8.4 The Strategy's vision is to stimulate a thriving labour market, where everyone has the opportunity for good work and to progress in their career, and where we work towards achieving the goal of an 80% employment rate.

8.5 The Construction sector is identified as part of the 'everyday' economy, which is considered to be critical to maximising economic activity and participation. Achieving positive outcomes for those working in the Everyday Economy - or for those seeking to make their way into it, it states, are key to ensuring future Growth impacts the lives of all residents.

8.6 Meeting the skills requirements of sectors within the Everyday Economy is considered to be at the heart of supporting positive, inclusive outcomes across the economy as a whole. The Strategy's focus on the Everyday Economy seeks to ensure that learning and training opportunities are designed and delivered to help local people at all levels of the economic spectrum - supporting people with complex needs to enter the labour market for the first time while simultaneously embedding global-level talent within highly specialised technology industries.

New or updated evidence

8.7 Further exploration has been carried out of what appropriate in lieu payments should be if a skills plan was not implemented directly by the development. This can be found in Appendix A below.

Additional alternative approaches considered

8.8 None.

Proposed approach

8.9 The following amendments have been made to the Draft Plan policy:

- Elements of the policy has been slightly altered to improve their clarity.
- An “and” is introduced to the list of what will be expected to be included in an Employment and Skills Plan to indicate that all of the elements would be expected.
- A 20% requirement for the proportion of jobs to be secured for local residents has been added for clarity and specifically tied to the construction phase of the development. A review of existing developments in the Greater Cambridge area with S106 agreements indicates that 20% is a reasonable target for local construction employment.
- A new supported employment places requirement for the occupation stage of a development has been added to the policy and supporting text. This is considered to be appropriate given the growing number of local residents who have difficulty accessing the Greater Cambridge local labour market. More detail on this can be found in Appendix A.
- An addition, “Employment and Skills Plans will be agreed on a site-by-site basis. For local micro businesses or quick construction works, should the developer be unable to fulfil the obligations set out in the policy, the

developers must engage with the councils to confirm if an alternative requirement would be acceptable.", responds to a number of representations received by seeking to ensure that there is flexibility incorporated into the policy to respond to the characteristics, including costs, of individual developments.

- An additional element has been added to the policy to cover circumstances where reasonable endeavours have not been made to meet an agreed employment and skills plan. Should this circumstance occur, an equivalent contribution for the shortfall in outputs will be sought by the councils.
- In the supporting text, to provide clarity that it is not just one of the examples and benchmarks listed are all required, an "and" has been added.
- The supporting text has also been altered to reflect reforms to the Planning system. More detailed guidance may be provided in a technical note rather than in supplementary planning guidance.
- Formulae for in-lieu payments has been added in Appendix G and the supporting text to the policy now outlines what areas of activities any money received will be spent on.

9. Proposed Submission Local Plan update to WS/HS: Pollution, health and safety

Policy context update

9.1 No additional policy context update.

New or updated evidence

9.2 No additional evidence update.

Additional alternative approaches considered

9.3 No additional alternative approaches identified.

Proposed approach

9.4 The following amendments have been made to the Draft Plan policy:

- Paragraph 1a amended to reference the role of lighting in protective security, to better reflect opportunities for addressing designing out crime.
- Create a new paragraph 1d, clarifying requirements to consider the impact on wildlife and nature conservation, and landscape character, particularly at settlement edges and the surrounding countryside.
- Supporting text – additional information on the role of the policy including the consideration of land contamination along with specific references to technical documents.
- Supporting text – on light pollution, specific reference has been added to barbastelle bats, reflecting comments raised by Natural England, and its association with the Eversden and Wimpole Woods European Special Area of Conservation (SAC). Reference was also added to best practice guidance on lighting, and the role lighting places in implementing policies within the Great Places theme.
- Supporting text – on hazardous materials, reference was added that

consideration must be given to preventative design measures and protective security preventing access to hazardous materials.

10. Proposed Submission Local Plan update to WS/PH: Public Houses

Policy context update

10.1 No additional policy context update.

New or updated evidence

10.2 Additional desk-based public houses assessments were completed to check their status and update our records, accordingly, leading to a finalised safeguarded pubs list that is now an appendices to the Plan.

10.3 **Greater Cambridge Retail and Leisure Study Reg19 Interim Study Findings** (2026) is an interim report compiled to inform future planning policy on town centre, retail and leisure matters in Greater Cambridge, together with a wider strategy for the future of the designated centres, up to 2045. A final version of the report will be issued later this year.

10.4 The report makes the following observations and recommendations regarding pubs and bars, as follows:

- Across Cambridge's network of centres there were 50 pubs/bars (5.1% of all units), which is broadly equivalent to the UK average (5.2%). The number of pubs/bars is higher in Cambridge City Centre (13, 12.4%), reflecting its position in the hierarchy and regional role.
- The Local Plan should be supportive of new pub and bar proposals and the continued development of the evening economy to increase the provision of pubs and bars also presents an opportunity to reduce vacancies across the authority area, where such changes comply with the relevant agent of change and neighbouring amenity considerations. Proposals to adapt the format of public houses, improving operational efficiencies, and their overall viability should be supported.

Additional alternative approaches considered

10.5 No additional alternative approaches identified.

Proposed approach

10.6 The following amendments have been made to the Draft Plan policy:

- Paragraph 1 has been re-written to clarify the circumstances where proposals will be supported for new or enhanced public houses, wine bars, and other drinking establishments where food is secondary.
- Paragraph 3 has been amended to provide additional clarification about the policy requirements along with the inclusion of a List of Safeguarded Public House Sites (featured in Appendix J). The latter clarifies the list of public houses including their curtilage that the policy will apply to. The list will be reviewed periodically.
- Appendix G has been amended to provide more clarity regarding public house viability appraisals.
- No amendments have been made to the supporting text other than for grammatical purposes.

Appendix A: Employment and Skills Payments in-lieu (Policy WS/IO: Creating inclusive employment and business opportunities through new developments)

1. Introduction

Greater Cambridge Local Plan Proposed Submission Plan Policy WS/IO states that payments in-lieu of construction benchmarks and occupation targets will only be considered in exceptional circumstances where the developer can satisfactorily demonstrate that:

a. there are circumstances specific to the scheme such that direct provision is not operationally feasible, or

b. an alternative means of delivery would result in a more effective outcome.

The policy also states that should instances occur where the target outputs in Employment and Skills Plans (ESPs) are not met or are partially met and the councils consider that reasonable endeavours have not been made, an equivalent contribution for the shortfall in outputs will be sought by the councils.

The proposed formulae for in-lieu payments are as follows:

1.1 Construction phase

i) Apprenticeships starts:

Shortfall against target number of apprenticeship starts

X (multiplied by)

£26,000 (the average net cost to employers in delivering an apprenticeship at Level 2 and 3)

ii) Job placements:

Shortfall against target number of job placements

X (multiplied by)

£3,417 (the average cost per job placement)

iii) School and College Engagement

Shortfall against target number of days activities

X (multiplied by)

£1,919 (the average cost of arranging 1 meaningful encounter for every pupil by the end of Year 11)

iv) Local Employment

Shortfall in the target of 20% of jobs (including apprenticeships) filled by local residents in Greater Cambridge

X (multiplied by)

£6,500 (the cost of employment support)

Target construction outputs (i)-(iii) will be calculated using benchmarks from the Construction Industry Training Board (CITB) National Skills Academy for Construction (NSAfC) Project Based Approach. In Greater Cambridge, the outputs of benchmark KPI2 (Jobs Started by NSAfC Projects) are expected to be apprenticeships.

1.2 Operational phase

i) Supported Employment

Shortfall in the number of supported employment places to be provided by the development.

Target Supported Employment to be calculated as follows:

SE = A X (multiplied by) B X (multiplied by) C

A. The number of jobs, including apprenticeships, estimated to be created during the occupation phase (calculated using the employment densities included in Greater Cambridge Employment and Housing Evidence Update, Iceni Projects Ltd, 2023)

B. 67.8 % (the percentage of Greater Cambridge residents expected to be employed as part of the workforce)

C. 5% (the percentage of Greater Cambridge working age residents who are unemployed or economically inactive but wanting to work)

In-lieu calculation:

Shortfall in Supported Employment target (SE)

X (multiplied by)

£6,500 (the cost of employment support)

All the costs contained in the formulae, will be reviewed annually by the councils and will be subject to appropriate indexation, to ensure that they remain appropriate to cover costs.

2. Rationale for proposed in-lieu charges

The following section explains the in-lieu costs identified for use in Greater Cambridge, and the reason for their selection.

2.1 Construction Phase

Apprenticeships (£26,000 per apprenticeship start): Reflects the cost of supporting a young person through a full level 2 and 3 construction programme as evidenced by a national government research paper on the true costs to employers published in 2012. The study covered the cost of supervision and administration by the employer as well as salary costs. The cost has not been inflated from the 2012 figures because the study is widely used by other local authorities without challenge and although a more recent study is not available, £26,000 is reasonable as a mid-point for gross employer costs for a full apprenticeship in today's market.

See salary costs on the government apprenticeship website which range from c£16-£30K - 102 results found (page 1 of 11) - Find an apprenticeship - GOV.UK

Source: BIS research paper number 67. Employer investment in apprenticeships and workplace learning: the fifth net benefits of training to employers study

Work Placements (£3,417 per work placement): Based upon Waltham Forest's methodology of using the average cost per person of a Level 1 and Level 2 Diploma. This methodology is proposed to ensure that there is an outcome for the person on placement in terms of addressing a skills gap that will lead them onto further work via an accredited qualification and is based upon course fee information.

The figure was provided by a local Waltham Forest college (minimum 26 weeks) which in 2016/17 prices was £3,234. This would be £4,522 in today's prices. Looking at local college course prices in Greater Cambridge Anglia Ruskin University guidance is that the fees for a full time Level 2 accredited qualification range from

£2,882 to £3,417. £3,417 has therefore been chosen as the unit cost for a work placement.

School and College Engagement (£1,919 per day): The councils expect developers to engage with local schools and colleges and support them to promote the achievement of the skills and qualifications needed for employment in the construction and built environment sectors of the development phase and also to promote the jobs/career paths that will be created in the occupation phase.

The figure has been calculated using the report 'Assessing benchmarks of good practice in school career guidance' commissioned by the Gatsby Charitable Foundation published in 2014. The Gatsby benchmarks of good practice are used by government to set standards for schools, colleges and independent training providers on providing careers guidance in line with Ofsted expectations and are therefore the right measure to calculate in-lieu costs against.

The study calculated the cost to a typical school of achieving the Gatsby Benchmark 5 of at least one meaningful encounter with an employer for every pupil aged 11 or over was £1,363. With inflation applied in line with the cumulative CPI the rate now would be £1,919.

Source: Microsoft Word - Gatsby_Draft report_Final.docx

Local Employment (£6,500 per job): Covers the provision of employment opportunities which have appropriate support to make them suitable for Greater Cambridge residents, particularly those who are unemployed and/or have difficulty accessing employment.

The £6,500 is proposed a reasonable mid-point between the three benchmarks listed below. This would be applied to any shortfall in the number of Greater Cambridge residents employed in the construction phase of the development following the application of the 20% requirement for local.

£4,100 is the average cost for supporting an economically inactive resident to find sustainable work. This cost is based on Connect to Work allocations for Cambridgeshire and Peterborough and is a proxy for the investment needed to support long term economically inactive residents into employment. The unit cost does not take account of the wider support that sustains the programme and does not include the County Council services, education, support by charities and third sector, health, and community development costs which all contribute to supporting adults into employment. DWP, Connect to Work Grant Guidance 2025

£6,500 is the cost of training, preparing and placing an unemployed person claiming Employment Support Allowance into sustainable employment paid by the DWP to its suppliers. Work Programme - programme costs to 31 March 2014

£8,217 is the average cost per paid job outcome for employment support services for people with learning disabilities and/or mental health problems. This is estimated from National Development Team for Inclusion 2014

2.2 Occupation phase

Supported Employment:

The focus of the occupation stage of a development will be on supporting residents who are unemployed or economically inactive and have difficulty accessing a job. This will include marginalised young people who face disadvantages in the labour market. The number of local residents expected to be employed by a development will be estimated by applying the current local employment rate to the estimated jobs to be generated by a development. The proportion of local residents currently unemployed or economically inactive and wanting to work will then be applied to the resulting figure to estimate the number of local residents likely to be needing more intensive employment support to work on the site. To calculate the in-lieu payments the resulting figure will then be multiplied by the cost of providing the support.

Number of apprenticeships and jobs estimated to be created during occupation phase To be calculated based on the GIA floorspace of the development proposal. The Greater Cambridge Employment and Housing Evidence Update 2023 (Iceni Projects Ltd) provided employment densities for different uses tailored to Greater Cambridge and it is reasonable to apply these densities to floorspace figures to obtain the number of jobs to be created by a development in its occupation phase.

Source: Greater Cambridge Employment and Housing Evidence Update

Local employment percentage. A local resident is defined as any person of working age living in Greater Cambridge at the time they begin employment. In Greater

Cambridge the local employment rate is 67.8 %, based upon the Greater Cambridge Employment and Housing Needs Update 2024/2025 which uses 2011 Census Data as the most reliable source given COVID 19 impacts on commuting patterns during the 2021 Census. This shows that in 2011, 115,105 of residents both lived and worked in Greater Cambridge or worked from home out of the 169,748 total of people working in Greater Cambridge

Source: Greater Cambridge Employment and Housing Needs Update 2024-2045 Final Report – September 2025 Published as part of draft Local Plan (Regulation 18) for consultation December 2025 – January 2026

Unemployment and economic inactivity. The economic inactivity rate for those aged 16-64 is 22.2% in Cambridge and 16.7% in South Cambridgeshire (Annual Population Survey Jan 2025-Dec 2025). The unemployment for the same period is 3.2% and 1.3% respectively. In Cambridge City 26.4% of economically inactive residents wanted a job. In South Cambridgeshire there is not an equivalent figure available for that period. albeit 94.9% do not want a job. Combining the two areas, just under 5% of residents aged 16-64 are unemployed or economically inactive and want a job.

Source: Annual Population Survey (Jan 2025-Dec 2025)

Supported Employment costs: £6,500 is proposed a reasonable mid-point between the four benchmarks listed below. This would be applied to any shortfall in the number of supported employment places provided to local residents in the occupation phase of the development.

£4,100 is the average cost for supporting an economically inactive resident to find sustainable work. This cost is based on Connect to Work allocations for Cambridgeshire and Peterborough and is a proxy for the investment needed to support long term economically inactive residents into employment. The unit cost does not take account of the wider support that sustains the programme and does not include the County Council services, education, support by charities and third sector, health, and community development costs which all contribute to supporting adults into employment. DWP, Connect to Work Grant Guidance 2025

£5,000 is an estimated cost per young person at risk of NEET or NEET engaged in the Youth Trailblazer programme led by the Cambridgeshire and Peterborough Combined Authority. This does not take account of wider support that sustains the programme therefore the unit cost would be higher to incorporate County Council services, education, youth service provision, health, and community development costs which all contribute to supporting young people who are NEET or at risk of NEET. (Public Pack)Agenda Document for Funding Committee, 08/12/2025 10:00

£6,500 is the cost of training, preparing and placing an unemployed person claiming Employment Support Allowance into sustainable employment paid by the DWP to its suppliers. Work Programme - programme costs to 31 March 2014

£8,217 is the average cost per paid job outcome for employment support services for people with learning disabilities and/or mental health problems. This is estimated from National Development Team for Inclusion 2014

3. Background evidence

The formulae outlined above have been developed drawing on a comparative review of approaches to in-lieu payments for employment and skills provision across a selection of local planning authorities in England, alongside research into relevant benchmark costs. This ensures that the approach is both evidence-based and appropriate to the Greater Cambridge context. The four authorities whose policies closely align with the proposed approach for Greater Cambridge are:

- Reading
- Stevenage
- Essex
- Lambeth

These authorities were selected on the basis that they have established Employment and Skills Plan requirements, supported by defined methodologies for calculating financial contributions where direct delivery is not achieved. In addition, a light-touch review of other local authority policies has been undertaken to provide further contextual understanding.

To assess the financial implications of each approach, the respective methodologies have been applied to a range of development typologies drawn from the Greater Cambridge Draft Local Plan Viability Assessment. This has been undertaken in two stages:

- Using the original cost assumptions within each authority's methodology; and
- Updating these assumptions to reflect current values, adjusted for inflation.

The findings for each authority area are outlined below. This is followed by a comparative summary and a summary of the lessons for Greater Cambridge.

3.1 Background

Greater Cambridge Local Plan Proposed Submission Plan Policy WS/IO, seeks to create inclusive employment and business opportunities through new development. Under this policy, developments over 1,000 square metres (within Use Classes E, B2, B8, C1, F1, F2 and Sui generis), as well as residential developments of over 10 dwellings, are required to prepare and implement an Employment and Skills Plan. This is expected, as a minimum, to demonstrate how developers will meet the benchmarks set out in the NSAfC Project Based Approach during the construction phase.

They include:

- Work placements for people in education and not in education.
- On-site jobs created lasting at least a month including apprentices, new entrants and graduates (local areas decide the split between these)
- Careers events including information about career opportunities, routes into the industry and what it's like to work in construction.
- Training weeks are the number of weeks individuals in the project workforce follow an approved training course. These could be apprenticeships, traineeships or technical or higher-level qualifications.
- Qualifications achieved including:
    - Vocational awards and diplomas equivalent to Level 2 or above
    - Apprenticeship completions
    - Professional qualifications
    - Leadership and management courses, such as from the Institute of Leadership and Management

- Health and safety courses, such as IOSH, NEBOSH, SMSTS and SSSTS
- Green skills

Skills and employment plans will include other initiatives outside the scope of the NSAfC Approach such as pupil work experience. The outputs defined in the NSAfC Framework may also be targeted at specific groups, for example young people or people with disabilities.

Table 1 shows the NSAfC benchmarks applied to a selection of developments from the Greater Cambridge Draft Local Plan Viability Assessment. Larger housing developments have been excluded from the analysis as the NSAfC guidance states that where a development value is over £100,000 CITB a formula has been developed to calculate Benchmarks and CITB should be consulted in such cases.

Table 1: NSAfC benchmarks applied to a selection of developments

Development	Work Placements	Jobs created	CCIAG events	Training weeks on site	Qualifying the workforce (NVQ2+)	Qualifying the workforce (Industry certification)	Qualifying the workforce (Total)	Green skills training (person hours)
A. Greenfield Science Park building 35% office/65% labs, 2763 m2 NIA	1	3	2	116	2	7	9	500
B. CBD Office building, 4250 m2 NIA	3	5	3	181	3	9	12	781
C. Greenfield fringe office park building, 8,500 m2 NIA	4	7	4	363	5	12	17	1,562
D. B2/B8 Greenfield, 5,000m2 NIA	1	1	1	69	1	4	5	297
E. Greenfield distribution/ warehouse, 10,000m2 NIA	1	3	2	41	3	5	8	625
F. Brownfield hotel (Fringe), 1,500m2 NIA	3	2	2	87	1	5	6	375

Development	Work Placements	Jobs created	CCIAG events	Training weeks on site	Qualifying the workforce (NVQ2+)	Qualifying the workforce (Industry certification)	Qualifying the workforce (Total)	Green skills training (person hours)
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	1	0	1	32	1	3	4	297
Urban, 12 flats	2	1	1	26	1	3	4	385
Urban, 50 flats	4	4	4	93	3	6	9	303
Brownfield Edge of Cambridge,150 houses and flats	9	9	7	292	7	9	16	946
Brownfield Dispersal villages, 50 homes	4	4	4	93	3	6	9	303
Greenfield Dispersal villages, 250 homes	12	11	10	525	10	10	20	1703

During their occupation phases it is expected that commerical development over 1,000 square metres, will deliver further employment and training targets. This must include providing a minimum number of supported employment places to local residents. As outlined in part 1.2, this will be calculated as follows:

A X (multiplied by) B X (multiplied by) C

Where:

A. is the number of jobs, including apprenticeships, estimated to be created during the occupation phase (calculated using the employment densities included in the Greater Cambridge Employment and Housing Evidence Update 2023).

B. is 67.8%, which is the percentage of Greater Cambridge residents expected to be employed as part of the workforce.

C. is 5%, which is the percentage of Greater Cambridge working age residents who are unemployed or economically inactive but wanting to work.

3.2 Local authority example - Reading

3.2.1 Policy overview

The Reading Employment, Skills and Training Supplementary Planning Document (SPD) (2013) requires the use of Section 106 planning obligations to secure employment and skills outcomes for qualifying developments.

3.2.2 Scope and thresholds

These requirements apply to:

- Commercial developments of 1000 square metres or more (or sites of 1 hectare or more); and
- Residential developments of 10 units or more (or sites of 0.5 hectares or more)

The policy covers both the construction phase and the end-user (occupation) phase of development.

3.2.3 Employment and Skills requirements

Developers are required to prepare and implement an Employment and Skills Plan (ESP), typically including:

- Delivery of apprenticeships
- Employment and training initiatives
- Work experience opportunities, particularly for young people and those not in education, employment or training (NEET)
- Measures to maximise local labour participation
- Commitments to local procurement

Where an ESP is agreed, delivery is expected to align with benchmarks derived from the NSAfC and relevant labour market data.

3.2.4 In-Lieu contributions

Where an ESP is not agreed, financial contributions are sought in-lieu of delivery.

Construction Phase Contribution:

£2,500 × (Gross Internal Area (square metres) ÷ 1,000)

- The £2,500 figure reflects the estimated average cost of construction training, as established in the SPD (source not specified).

Occupation Phase Contribution:

(Gross Internal Area (square metres) ÷ employment density) × 50% × 30% × £1,500

Where:

- 50% represents the target proportion of jobs filled by local residents
- 30% represents the proportion without Level 2 qualifications
- £1,500 reflects the average cost of end-user training (source not specified)

3.2.5 Monitoring and administration

Monitoring of delivery is undertaken by the Skills for Business Coordinator (SfBC), with fees set at:

- £25 per construction training output
- £15 per end-user training output

In addition, 3% of total contributions is allocated to support the SfBC role.

Table 2: Reading figures applied to Greater Cambridge developments – construction phase

Development	Floorspace GIA (square metres)*	ESP not provided	ESP not provided March 2026 prices (Inflation calculator | Bank of England)
A. Greenfield Science Park building (35% office/65% labs, 2,316 m2 NIA	2,725	£6,813	£9,733
B. CBD Office building, 4250 m2 NIA	5,000	£12,500	£17,859
C. Greenfield fringe office park building, 8,500 m2 NIA	10,000	£25,000	£35,717
D. B2/B8 Greenfield, 5,000m2 NIA	5,000	£12,500	£17,859
E. Greenfield distribution/ warehouse, 10,000m2 NIA	10,000	£25,000	£35,717
F. Brownfield hotel (Fringe), 1,500m2 NIA	1,875	£4,687	£6,697

G. Greenfield Supermarket South Cambs, 1,000m2 NIA	1,000	£2,500	£3,572
Urban, 12 flats	941	£2,353	£3,361
Urban, 50 flats	3,952	£9,880	£14,113
Brownfield Edge of Cambridge,150 houses and flats	13,596	£33,990	£48,554
Brownfield Dispersal villages, 50 homes	4,786	£2,393	£17,092
Greenfield Dispersal villages, 250 homes	23,467	£58,668	£83,806

* GIA figures taken from the Greater Cambridge Draft Local Plan Viability Assessment

Table 3: Reading figures applied to Greater Cambridge developments – Occupation phase

The table below assumes target local jobs rates in the occupation phase of 20% and 50%. The percentage of residents in Greater Cambridge without RQF2 and above is 6.1%. This is used in the calculation rather than Reading's figure of 30%.

Development	Floorspace GIA (sq. m)	ESP not provided 20% target	ESP not provided March 2026 prices 20% target (Inflation calculator | Bank of England)	ESP not provided 50% target	ESP not provided March 2026 prices 50% target (Inflation calculator | Bank of England)
A. Greenfield Science Park building 35% office/65% labs, 2,316 m2 NIA	2,725	£2,639	£3,770	£6,584	£9,407
B. CBD Office building, 4250 m2 NIA	5,000	£7,071	£10,102	£17,676	£25,254

C. Greenfield fringe office park building, 8,500 m2 NIA	10,000	£14,141	£20,203	£35,352	£50,507
D. B2/B8 Greenfield, 5,000m2 NIA (50/50 split assumed)	5,000	£1,880	£2,686	£4,699	£6,713
E. Greenfield distribution/ warehouse, 10,000m2 NIA	10,000	£2,902	£4146	£7,255	£10,365
F. Brownfield hotel (Fringe), 1,500m2 NIA **	1,875	-	-	-	-
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	1,000	£1,046	£1,494	£2,614	£3,735

* Density calculations are based on figures in the Greater Cambridge Employment and Housing Evidence Update 2023, Iceni Projects Ltd and HCA Employment Density Guide 3rd edition 2015

** an alternative density calculation would be required.

3.3 Local authority example - Stevenage

3.3.1 Policy overview

The Stevenage Developer Contributions Supplementary Planning Document (SPD) (2025) sets out requirements for securing local employment and skills outcomes through major development. The policy emphasises the importance of ensuring that the benefits of growth are directly realised by local residents.

3.3.2 Scope and thresholds

The requirements apply to major developments, with obligations secured through Section 106 agreements.

3.3.3 Employment and Skills requirements

Developers are expected to meet the following targets during the construction phase:

- 5–10% of on-site construction jobs to be filled by Stevenage residents

- One apprenticeship per 10 construction jobs, to be filled by a Stevenage resident or student (capped at 10 apprenticeships)
- Monitoring and reporting of performance against these targets

3.3.4 In-Lieu contributions

Where monitoring demonstrates that these targets have not been met, the SPD requires financial contributions in-lieu of delivery, calculated as follows:

- £4,000 per construction job not filled by a Stevenage resident
- £2,000 per apprenticeship not filled by a Stevenage resident or student
- £500 per apprenticeship as an administrative fee to support the brokerage system

Where apprenticeship opportunities cannot reasonably be provided (for example, due to short construction programmes), a reduced contribution is applied:

- £1,000 per apprenticeship not created

The SPD does not specify the evidence base for these cost assumptions, but notes that the contribution levels have been set at a level intended to avoid impacting scheme viability while generating meaningful investment in local employment and training.

The Stevenage approach does not include requirements or in-lieu contributions relating to the end-user (occupation) phase of development.

Table 5: Stevenage figures applied to Greater Cambridge developments – construction phase

These figures are based on the NSAfC benchmarks for the selected developments in Greater Cambridge and a target percentage of 20% of construction jobs filled by local people. The £500 fee per apprenticeship position is not included.

Development	Construction jobs	20% construction jobs	100% targeted jobs (20%) not filled by local residents	Jobs created (apprenticeships)	100% apprentice-ships not achieved (assumed CITB Jobs created)	Total 100% not achieved February 2025 prices	Total 100% not achieved March 2026 prices ([Inflation calculator | Bank of England]())
A. Greenfield Science Park building 35% office/ 65% labs, 2763 m2 NIA	35	7	£28,000	3	£6,000	£34,500	£35,805
B. CBD Office building 4250 m2 NIA	61	12.2	£48,800	5	£10,000	£58,800	£61,024
C. Greenfield fringe office park building 8,500m2 NIA	116	23.2	£92,800	7	£14,000	£106,800	£110,840
D. B2/B8 Greenfield, 5,000m2 NIA	21	4.2	£16,800	1	£2,000	£18,800	£19,511

Development	Construction jobs	20% construction jobs	100% targeted jobs (20%) not filled by local residents	Jobs created (apprentices hips)	100% apprenti ce-ships not achieved (assumed CITB Jobs created)	Total 100% not achieved February 2025 prices	Total 100% not achieved March 2026 prices ([Inflation calculator | Bank of England](#))
E. Greenfield distribution/ warehouse, 10,000m2 NIA	43	8.6	£34,400	3	£6,000	£40,400	£41,928
F. Brownfield hotel (Fringe) 1,500m2 NIA	25	5	£20,000	2	£4,000	£24,000	£24,908
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	8	1.6	£6,400	0	N/A	£6,400	£6,642
Urban, 12 flats	8	1.6	£6,400	1	£2,000	£8,400	£8,718
Urban, 50 flats	35	7	£28,000	4	£8,000	£36,000	£37,362

Development	Construction jobs	20% construction jobs	100% targeted jobs (20%) not filled by local residents	Jobs created (apprenticeships)	100% apprentice-ships not achieved (assumed CITB Jobs created)	Total 100% not achieved February 2025 prices	Total 100% not achieved March 2026 prices ([Inflation calculator | Bank of England]())
Brownfield Edge of Cambridge, 150 houses and flats	108	21.6	£86,400	9	£18,000	£104,400	£108,349
Brownfield Dispersal villages, 50 homes	39	7.8	£31,200	4	£8,000	£39,200	£40,683
Greenfield Dispersal villages, 250 homes	207	41.4	£165,600	11	£22,000	£188,600	£195,734

3.4 Local authority example – Essex

3.4.1 Policy overview

The Essex County Council Developers’ Guide to Infrastructure Contributions (Revised 2023) sets out the Council’s approach to securing infrastructure contributions, including employment and skills provision. While not a statutory planning document, the Guide provides detailed cost assumptions, requirements, and expectations to support decision-making by developers, local planning authorities, and planning committees.

3.4.2 Scope and thresholds

An Employment and Skills Plan (ESP) is required for:

- Residential developments of 50 dwellings or more; and
- Employment developments delivering 2,500 square metres (GIA) or more of floorspace.

Where it can be demonstrated that direct delivery is not operationally feasible, or that an alternative approach would result in a more effective outcome, financial contributions in-lieu may be considered.

3.4.3 Employment and skills requirements

For the construction phase, Essex aligns with the NSAfC benchmarks. These include expectations relating to:

- Apprenticeships
- School and college engagement
- Work experience placements

The Guide provides a summary of expected outputs; however, these are not differentiated by development type in the same way as the NSAfC benchmarks.

For the occupation (end-use) phase, Essex places a particular emphasis on supported employment opportunities for local residents, especially those requiring additional support to access the labour market

3.4.4 In-Lieu contributions

Essex adopts a detailed, output-based approach, with separate formulas for different types of employment and skills provision

Construction phase

Contributions are calculated based on the shortfall against target outputs:

Apprenticeships

Shortfall × £26,000

(Average net cost of delivering a Level 2 or 3 apprenticeship)

School and College Engagement

Shortfall in activity days × £1,472

(Average cost of facilitating one meaningful engagement encounter)

Work Experience Placements (minimum one week)

Shortfall × £8,272

(Average cost of delivering a work experience placement)

Occupation phase

Supported Employment Opportunities

Shortfall × £8,217

- Target: 1 supported job placement per 2,500 square metres of commercial floorspace
- Placements should last a minimum of 4–6 months and prioritise Essex residents
- Cost reflects the average expense of employment support services for individuals requiring additional assistance (e.g. those with disabilities or barriers to employment)

3.4.5 Additional contributions (not linked to shortfalls)

Pre-Employment and Skills Training Provision**

This contribution is required regardless of shortfall and supports broader workforce development activity.

Formula:

(Number of jobs and apprenticeships created) × 79% × 27.7% × £2,000

Where:

- 79% represents the proportion of Essex residents expected to be employed locally
- 27.7% reflects the proportion of residents with lower qualification levels (≤ NVQ1) requiring support

£2,000 reflects the average cost of providing training and employment support

3.4.6 Evidence base for cost assumptions

The Essex approach is supported by a range of published sources, including:

- £26,000, the average net cost to employers in delivering a construction apprenticeship at Level 2 and 3, is sourced from Employer Investment in Apprenticeships and Workplace Learning: The Fifth Net Benefits to Employers Study, London: Department for Business Innovation and Skills, Research Report 67 - Hogarth, T., Gambin, L., Winterbotham, M., Koerbitz, C., Hasluck, C., Baldauf, B. (2012).
- £1,472, the average. cost of arranging 1 meaningful encounter, is sourced from PWC, Assessing Benchmarks of Good Practice in School Career Guidance (Appendix 3, using School B estimated costs as this best reflects the average profile of an Essex secondary school) National Development Team for Inclusion.
- £8,217 average cost per paid job outcome for employment support services for people with learning disabilities and/or mental health problems from The cost effectiveness of Employment Support for People with Disabilities - NDTi2C_March_2014_final_v2.pdf

Some cost assumptions (e.g. work experience placements and pre-employment training) are included without clearly referenced sources

Table 6: Essex figures applied to Greater Cambridge developments – construction phase

These figures are based on the NSAfC benchmarks for the selected developments in Greater Cambridge

Development	100% apprentice-ships not achieved	100% work placements not achieved	100% careers events not achieved	Total 2023	Total March 2026 prices ([Inflation calculator | Bank of England])
A. Greenfield Science Park building 35% office/65% labs, 2763 m2 NIA	£78,000	£8,272	£2,944	£89,216	£94,989
B. CBD Office building, 4250 m2 NIA	£130,000	£24,816	£4,416	£159,232	£169,536
C. Greenfield fringe office park building, 8,500 m2 NIA	£182,000	£33,088	£5,888	£220,976	£235,276
D. B2/B8 Greenfield, 5,000m2 NIA	£26,000	£8,272	£1,472	£35,744	£38,057
E. Greenfield distribution/ warehouse, 10,000m2 NIA	£78,000	£8,272	£2,944	£89,218	£94,992
F. Brownfield hotel (Fringe), 1,500m2 NIA	£52,000	£24,816	£2,944	£79,760	£84,921
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	-	£8,272	£1,472	£9,744	£10,375
Urban, 12 flats	£26,000	£16,544	£1,472	£44,016	£46,864
Urban, 50 flats	£104,000	£33,088	£5,888	£142,976	£152,228
Brownfield Edge of Cambridge,150 houses and flats	£234,000	£74,448	£10,304	£318,752	£339,379

Development	100% apprentice-ships not achieved	100% work placements not achieved	100% careers events not achieved	Total 2023	Total March 2026 prices (Inflation calculator | Bank of England)
Brownfield Dispersal villages, 50 homes	£104,000	£33,088	£5,888	£142,976	£152,228
Greenfield Dispersal villages, 250 homes	£286,000	£99,264	£14,720	£399,984	£425,868

Table 7: Essex figures applied to Greater Cambridge developments – Occupation phase

Development	Floorspace GIA (sq. m)*	Occupation outputs not achieved 2023	Occupation outputs not achieved March 2026 prices (Inflation calculator | Bank of England)
A. Greenfield Science Park building (35% office/65% labs, 2763 m2 NIA	2,725	£8,957	£9,537
B. CBD Office building, 4250 m2 NIA	5,000	£16,434	£17,497
C. Greenfield fringe office park building, 8,500 m2 NIA	10,000	£32,868	£34,995
D. B2/B8 Greenfield, 5,000m2 NIA	5,000	£16,434	£17,497
E. Greenfield distribution/ warehouse, 10,000m2 NIA	10,000	£32,868	£34,995
F. Brownfield hotel (Fringe), 1,500m2 NIA	1,875	£8,217	£8,749
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	1,000	£3,287	£3,500

3.5 Local Authority example – Lambeth

3.5.1 Policy overview

Policy ED15 (Employment and Training) in the Lambeth Local Plan 2020-2035 (Sept 2021) states that “the council will support employment and training schemes to maximise local employment opportunities and help address skills deficits in the local population.”

3.5.2 Scope and thresholds

A site-specific Employment and Skills Plan (ESP) is required from major development proposals which should address how the developer intends to deliver the requirements outlined below.

Developers must make all reasonable endeavours to meet the requirements. If the developer can demonstrate to the satisfaction of the council that there are circumstances specific to the scheme such that either direct provision is not operationally feasible, or that an alternative means of delivery would result in a more effective outcome, then the council may consider a financial contribution in-lieu.

3.5.3 Employment and skills requirements

i. A target of 25 per cent of all jobs created by the development (in both the construction phase and net additional jobs for the first two years of end-use occupation of the development) to be secured by the council for local residents. Through one or more of the following:
    a. Provision of apprenticeships for Lambeth residents, with demonstrable targeted engagement of those aged under 25. The council expects that ordinarily, one new apprenticeship would be capable of being generated by every 1,000 square metres of development or every 10 residential units provided.
    b. Provision of employment opportunities in the end-user phase which have appropriate support to make them suitable for long-term unemployed Lambeth residents. The council would expect every 2,500 square metres of development to be capable of generating at least one paid job placement lasting for a minimum of six months.
    c. Provision for notification of job vacancies, arising from both the

construction and end-use phases, to the council or any other agency nominated by the council.

d. Provision for delivery of bespoke pre-employment and skills training for Lambeth residents that will provide them with the skills and experience to access the jobs that are being created.

ii. Developers to engage with local schools, colleges and/or community organisations to promote amongst young people the range of careers available, skills and qualifications needed for employment in the construction and commercial sectors of the end-use occupiers in place during the first two years of the development.

3.3.4 In-Lieu contributions

Apprenticeships for Lambeth residents aged under 25 (construction and end use phases).

Shortfall in apprenticeship starts x £26,000

(Average net cost of delivering a Level 2 or 3 apprenticeship)

Supported employment opportunities in the end user phase for long-term unemployed Lambeth residents

Shortfall supported employment opportunities x £8,217

(Average cost per paid job outcome for employment support services for people with learning disabilities and/or mental health problems)

3.3.5 Additional contributions (not linked to shortfalls)

Financial contributions to help support those sections of the Lambeth workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills will be required.

Notification of job vacancies, arising from both the construction and end use occupation and **Work with the Council in the design and delivery of bespoke pre-employment and skills training for Lambeth residents**

Formula:

Number of jobs to be created x 25% x 17.8% x £6,500

Where:

- The number of jobs created is applied to the construction phase and end-use development during the first two years.
- 25% is the percentage of Lambeth residents expected to be employed as part of the workforce
- 17.8% of Lambeth residents with qualifications equivalent to or less than NVQ1 requiring training and/or support
- £6,500 average cost for Lambeth unemployed resident in terms of support and training to obtain access to a skilled job.

Engagement with young people aged 11 to 19 through local schools and colleges to promote relevant skills and qualifications.

Formula:

Apprenticeships expected to be created/2 X (£2,001+£12,950)

Where:

- £2,022 is the average cost of arranging 1 meaningful encounter (£2,001)
- £12,950 is the cost of 1 workplace experience for every pupil by the end of Year 11.

3.3.6 Evidence base for cost assumptions

The Lambeth approach is supported by a range of published sources:

- £6,500 is the cost of training, preparing and placing an unemployed person claiming Employment Support Allowance into sustainable employment paid by the DWP to its suppliers. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/325995/Work_Programme_Costs_v7_2014-07-01.pdf (March 2014)
- £2,001 and £12,950 are sourced from PWC, Assessing Benchmarks of Good Practice in School Career Guidance (Appendix 3, using School B estimated costs as this best reflects the average profile of a Lambeth secondary school) http://www.gatsby.org.uk/uploads/education/reports/pdf/pwc-assessing-benchmarks-of-good-practice-in-school-career guidance.pdf

Table 8: Lambeth figures applied to Greater Cambridge developments – construction phase

These figures are based on the NSAfC benchmarks for the selected developments in Greater Cambridge.

Development	100% apprentice-ships not achieved	Total 2021	Total March 2026 prices (Inflation calculator | Bank of England)
A. Greenfield Science Park building (35% office/65% labs, 2763 m2 NIA)	£78,000	£78,000	£98,421
B. CBD Office building, 4250 m2 NIA	£130,000	£130,000	£164,035
C. Greenfield fringe office park building, 8,500 m2 NIA	£182,000	£182,000	£229,649
D. B2/B8 Greenfield, 5,000m2 NIA	£26,000	£26,000	£32,807
E. Greenfield distribution/ warehouse, 10,000m2 NIA	£78,000	£52,000	£65,614
F. Brownfield hotel (Fringe), 1,500m2 NIA	£52,000	£52,000	£65,614
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	-	-	-
Urban, 12 flats	£26,000	£26,000	£32,807
Urban, 50 flats	£104,000	£104,000	£131,228
Brownfield Edge of Cambridge,150 houses and flats	£234,000	£234,262	£295,262
Brownfield Dispersal villages, 50 homes	£104,000	£104,000	£131,228
Greenfield Dispersal villages, 250 homes	£286,000	£286,000	£360,876

Table 9: Lambeth figures applied to Greater Cambridge developments – Occupation phase

This excludes apprenticeship outputs which are assumed to be delivered during the construction stage.

Development	Floorspace GIA (sq. m)*	Occupation outputs not achieved 2021	Occupation outputs not achieved March 2026 prices (Inflation calculator | Bank of England)
A. Greenfield Science Park building (35% office/65% labs, 2763 m2 NIA	2,725	£8,217	£10,368
B. CBD Office building, 4250 m2 NIA	5,000	£16,434	£20,737
C. Greenfield fringe office park building, 8,500 m2 NIA	10,000	£32,868	£41,473
D. B2/B8 Greenfield, 5,000m2 NIA	5,000	£16,434	£20,737
E. Greenfield distribution/ warehouse, 10,000m2 NIA	10,000	£32,868	£41,473
F. Brownfield hotel (Fringe), 1,500m2 NIA	1,875	£8,217	£10,368
G. Greenfield Supermarket South Cambs, 1,000m2 NIA	1,000	£8,217	£10,368

3.6 Construction stage summary

Table 10: A comparison of in-lieu construction payments across areas for selected developments

	C. Greenfield fringe office park building, 8,500 m2 NIA	D. B2/B8 Greenfield, 5,000m2 NIA	Urban, 12 flats	Greenfield Dispersal villages, 250 homes
Reading	£25,000	£12,500	£2,353	£58,668
Stevenage	£106,800	£18,800	£8,400	£188,600
Essex	£220,976	£35,744	£44,016	£399,984
Lambeth	£182,000	£26,000	£26,000	£286,000

Table 11: A comparison of in-lieu construction payments across areas for selected developments with updated prices to March 2026.

	C. Greenfield fringe office park building, 8,500 m2 NIA	D. B2/B8 Greenfield, 5,000m2 NIA	Urban, 12 flats	Greenfield Dispersal villages, 250 homes
Reading	£35,717	£17,859	£3,361	£83,806
Stevenage	£110,840	£19,511	£8,718	£195,734
Essex	£235,276	£38,057	£46,864	£425,868
Lambeth	£229,649	£32,807	£32,827	£360,876

Whilst developers in Reading are expected to deliver outputs based on NSAfC construction benchmarks construction projects and labour market patterns in the industry, Reading's formula for the calculation of in-lieu payments is not related to the NSAfC benchmarks. It is simply the gross internal floor area of scheme (m2) divided by 1000m2 and then multiplied by £2,500 which is considered to be the average cost of training in 2013. No source for this figure is provided.

Reading's figures are the lowest of the four authorities with figures for most schemes less than a third of the nearest figures which are from Stevenage. Reading's SPD was prepared in 2013. Table 11 shows the figures if inflation is applied, Reading's figures remain substantially below the other authorities even when adjusted for inflation.

Developers in Reading are also asked for a monitoring fee for a Skills for Business Coordinator (SfBC) to monitor the agreed Employment and Skills Plan which is £25 per training output as agreed through the ESP.

Stevenage's Developer Contributions SPD was adopted in 2025. The outputs asked for are not related to NSAfC outputs. Developers are required to attempt to fill 5% to 10% of construction jobs on-site associated with their development with Stevenage residents and to fill one apprenticeship position per 10 construction jobs on-site with a Stevenage resident or student (with a cap for requirement of 10 apprenticeships).

A source is not provided for the Stevenage figures (£2,000 and £4,000) however it is stated that they are "considered appropriate so as not to affect the viability of a scheme, but to provide potentially significant funds to those wanting to undertake training or provide jobs for local residents." Stevenage is the only authority that was reviewed that asks for payments in-lieu where there is a shortfall in the percentage of construction jobs achieved.

If a major development in Stevenage could not provide suitable apprenticeship opportunities due to the quick construction of the development project, and the resultant lack of suitable opportunity to provide apprenticeships, they should pay a lesser fee of £1,000 per number of targeted apprenticeships not created rather than the £2,000 fee."

A fee of £500 per apprenticeship position is also asked for as an administrative fee towards the brokerage system to fill apprenticeship positions.

Stevenage's figure sits in the middle ground of the four authorities and the payments applied appear to seek a balance between the costs of employment and skills initiatives and the viability of schemes. Essex (2023) and Lambeth (2021) use the same figure for apprenticeship costs (£26,000) to calculate their outputs. For Lambeth this is the only payment they require in-lieu of construction outputs whereas Essex ask for in-lieu payments where apprenticeships, work placements (£8,272) and careers events (£1,472) are not achieved.

Essex's figures are applied to NSAfC benchmarks so that the formula is directly linked to any underachievement of outputs. They ask for the highest payments of all the authorities, however they provide sources on most of the figures which directly link to the cost of provision.

Essex also requires an additional pre-employment payment not related to in-lieu payments for the provision for notification of job vacancies, arising from both the construction and end-use occupation, to the Council or any other agency nominated by the Council and the delivery of bespoke pre employment and skills training for Essex residents that will provide them with the skills to access the jobs that are being created. £2,000 is used as the average cost for Essex unemployed resident in terms of support and training to obtain access to a skilled job.

Lambeth also ask for payments not related to shortfalls in outputs. This includes for the notification of job vacancies, arising from both the construction and occupation stages and for bespoke pre-employment and skills training for Lambeth residents and engagement with young people aged 11 to 19 through local schools and colleges to promote relevant skills and qualifications. The former includes the figure of £6,500 to represent the average cost for Lambeth unemployed resident in terms of support and training to obtain access to a skilled job. The latter includes £14,951 as the average cost of arranging 1 meaningful encounter (£2,001) and 1 workplace experience (£12,950) for every pupil by the end of Year 11.

3.7 Occupation stage summary

Location	C. Greenfield fringe office park building, 8,500 m2 NIA	C. Greenfield fringe office park building, 8,500 m2 NIA (March 2026 prices)	D. B2/B8 Greenfield, 5,000m2 NIA	D. B2/B8 Greenfield, 5,000m2 NIA (March 2026 prices)
Reading	£35,352	£50,507	£4,699	£6,713
Stevenage	N/A	N/A	N/A	N/A
Essex	£32,868	£34,995	£16,434	£17,497
Lambeth	£32,868	£41,473	£16,434	£20,737
K&C (Cambridge)	£54,091	-	£15,222	-
K&C (South Cambs)	£27,045	-	£7,298	-

Reading's formula for the occupation phase includes a proportion of jobs to be filled by Reading residents. As part of its formula Reading uses £1,500 is stated as "Average cost of end user related training". The source of this figure is not provided.

Both Lambeth and Essex use a formula which divides the square metres of a development by £2,500 and multiplies this by £8,217 which is the average cost per paid job outcome for employment support services for people with learning disabilities and/or mental health problems.

The resulting costs for office developments in the three areas are roughly similar, whilst the figure for B2/B8 space is different reflecting the fact that the Reading formula is more development specific as it uses employment densities in the calculation.

Elsewhere, for the occupation phase, Kensington and Chelsea use the new floor area of a development divided by the number of employees per square metres and then multiplies this by the current proportion of unemployed residents seeking work in the Borough and then by £3,500. This is not an in-lieu calculation, it is a sum of money to be provided.

3.8 Lessons for Greater Cambridge

- For the construction phase, a system of in-lieu payments linked to NSAfC benchmarks similar to those used in Essex would be the most transparent and easily implementable method of seeking in-lieu payments albeit this would not provide for the receipt of costs where other NSAfC benchmarks are not achieved e.g. training days or green skills.
- Where the Greater Cambridge policy requirement for 20% of jobs to be taken by local residents is not achieved during the construction phase, a formula similar to that used in Stevenage would also be appropriate.
- There may be circumstances were the NSAfC outputs are not appropriate, for example where construction projects are very quick. In these cases, greater flexibility to respond on a case-by-case basis would be appropriate.
- A range of costs are applied by authorities across England. A clear justification for figures included in any Greater Cambridge formulae and the ability to adjust figures for inflation will be important in ensuring that the opportunity costs for the replacement of outputs can be covered for the duration of the Local Plan.
- Given Greater Cambridge's higher levels of local employment and the growing number of residents who are unemployed or economically inactive, it is appropriate for Greater Cambridge to focus on supporting local residents who have difficulty accessing the labour market in the occupation phase of a development. An in-lieu payment for the occupation phase should be based on the target outputs for supported employment for local residents.
- Basing requirements on expected job creation using employment densities for individual uses is a reasonable and proportionate approach for the occupation stage.

Annex 1: CITB benchmark definitions

Work Placements: This KPI is aimed at providing people with the opportunity to carry out tasks agreed by their supporting organisation (where applicable) and the employer enabling the individual to gain a meaningful insight into the construction sector.

- This Benchmark quantifies work experience on NSAfC Projects for students (14 years plus) from schools, colleges – including T-Levels placements - and universities who undertake a work-experience placement for a minimum of five working (consecutive or non-consecutive) days*. This KPI is aimed at providing students with the opportunity to carry out tasks agreed by the education provider and the employer enabling the learner to gain a meaningful insight into the construction sector.
- It also quantifies work experience on NSAfC Projects for people who are not enrolled on a course of education/study and who undertake a work-experience/pre-employment placement for a minimum of five working (consecutive or non-consecutive) days. This can include individuals from organisations such as the Prince's Trust, Probation Service, Job Centre Plus, Women into Construction, Armed Forces re-settlement programmes or local community organisations. It may also be appropriate for individuals seeking a career change.

This Benchmark relates to the ESP template spreadsheet rows:

- Work Experience Placement (In Education)
- Work Experience Placement (Not in Education).

Jobs Created: the creation of new and sustainable job opportunities for new entrants into the sector who are required on the project site(s) by the main contractor or subcontractor.

- People who are employed as apprentices
- People previously unemployed
- People transferring from other industries
- Graduates.

CCIAG events: the number of events focused on improving the image of the sector, organised and delivered in the course of the project. Events must be aimed at increasing awareness of the opportunities available within the industry, what it is like to work in construction and how to get into the sector. To be counted, the activity must be formally structured and agreed by the project and the participating organisation.

The key Benchmark groups for delivery of this outcome are:

- Entrants 14-19 (e.g., people currently not in education, employment or training, or school students, school leavers, college students)
- Undergraduates
- Influencers (e.g., schools/universities, adult influencers, careers advisors, learning providers, community groups).

Training weeks on site: This Benchmark quantifies the number of weeks of formal training undertaken by trainees/new entrants working on a NSAfC Project. This will involve training following a recognised syllabus of study which has been accredited/certificated by either an awarding body for that qualification or by the recognised issuing organisation. One training week equals five working days.

This Benchmark relates to the ESP template spreadsheet rows:

- New entrants undertaking apprenticeships
- New entrants undertaking technical/higher level qualifications.

Qualifying the workforce (NVQ2+): This Benchmark relates to on-site based individuals gaining a nationally recognised qualification equivalent to Level 2 or above. Achievements can include vocational awards/diplomas, apprenticeship completions, professional qualifications, leadership and management courses including ILM, and Health and Safety (including IOSH, NEBOSH, SMSTS & SSSTS). Outcomes must be accredited by a nationally recognised professional institution or awarding body.

It relates to people achieving operative, technical or higher-level industry certification. Achievements can include short duration courses, project specific learning e.g., products, installation, technologies, or may relate to occupational competence, licence to practice or sector specific training e.g., the environment, sustainability, health and safety.

Outcomes must be accredited by public education establishments, employers or other training providers and may be held externally or in-house and must be a minimum duration of 3 hours. This Benchmark relates to the ESP template spreadsheet rows:

- Qualifications achieved (NVQ2 or above)
- Qualifications achieved (technical or higher level).

Green skills training (person hours): This Benchmark emphasises the need for everyone engaged in a project to understand the concept of Net Zero and the importance of taking steps to achieve it. The Benchmark quantifies the number of hours spent on Green Skills training by employees of the contractor and the contractor's supply chain. The nature and duration of training will depend on the project's needs and the prior experience of the workforce. Examples of relevant training are provided in Annex A. Outcomes captured under this KPI cannot contribute to the achievement of any other Benchmark. There is to be no double counting.