

Summaries of Representations and Responses – Jobs Chapter

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Jobs

Hyperlink for all comments

Open this hyperlink - [Jobs](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

27

Abbreviations

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

Executive Summary

Some developers, private-sector organisations and councils expressed support for the aims of the policies in this section. A few parish councils argued the statistics forecasting jobs growth need to be reconsidered after Covid-19 and three respondents argued that the figures were too high.

A few landowners argued that the policies do not promote the needs of Cambridge's high technology clusters or life sciences sectors. Some landowners also emphasised the need for the Local Plan to be flexible in its approach to commercial, retail and leisure uses. Contrastingly Histon and Impington Parish Council argued that new jobs should not be limited to high-tech jobs but cover a range of employment types. The Cambridge and South Cambridgeshire Green Parties argued that the Local Plan must

effectively tackle poverty and inequality in Greater Cambridgeshire and that growth in high-tech clusters will not address these problems. Great Shelford Parish Council argued that the policies in the Jobs Chapter needed to place a greater emphasis upon protecting the rural economy. There were a few comments relating to sites, with developers arguing that their site could deliver the aims of the policies.

Representations for Jobs

Summary of issues raised in comments	Comments highlighting this issue
<p>Agree with the Plan's aim to" encourage a flourishing and mixed economy in Greater Cambridge which includes a wide range of jobs, while maintaining our area's global reputation for innovation"</p>	<p>Councils</p> <p>59699 (Central Bedfordshire Council)</p> <p>Landowners</p> <p>58021 (Imperial War Museum/Gonville and Caius College), 58802 (Trumpington Meadows Land Company, 'TMLC', a joint venture between Grosvenor Britain &</p>

Summary of issues raised in comments	Comments highlighting this issue
	Ireland, GBI, and Universities Superannuation Scheme, USS), Education Institutions 58910 (University of Cambridge)
The policies are positive and forward thinking in the current climate in that they seek to reflect how the approach to working environments is changing, by supporting remote working and improving facilities on employment parks.	59699 (Central Bedfordshire Council)
Needs to be reconsidered in light of COVID, work/lifestyle changes and change in working population.	56759 (Croydon PC), 58465 (Linton PC)
No real examination of what jobs might be in COVID-influenced times. It would be good to see community work hubs similar to WeWork, so that instead of	59237 (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
working from home people have an alternative option.	
Concerned that the draft policies do not provide clear and supportive policies promoting the needs of the high technology clusters that Cambridge is famous for as required by the NPPF at Paras 81 and 83.	58021 (Imperial War Museum/Gonville and Caius College)
Support the Council's aims in respect of jobs, however concerned its approach will constrain sustainable economic growth through a lack of available land to 2041.	58347 (Hallam Land Management Limited)
Support the need to plan for future job growth. However, the proposed number of jobs represents an annual growth rate which is significantly lower than the historic growth rates achieved consistently since 1991. The growth	58870 (CBC Limited, Cambridgeshire County Council and a private family trust)

Summary of issues raised in comments	Comments highlighting this issue
potential of the Life Sciences sector in particular should be reflected in the proposed approach. There has never been a more important time to support and invest in centres of excellence for health and life sciences.	
Jobs are always key	58034 (Great and Little Chishill Parish Council)
Continuing economic growth is vital for the nation, the region, and for Greater Cambridge	57911 (Martin Grant Homes)
The Cambridge economy is important regionally and provides multiple benefits locally. Its international reputation has been a spring-board for diverse local business across a wide range of types, including start-ups, studios, workshops, manufacturing, leisure, retail and logistics businesses. This process needs to be	57911 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
<p>encouraged and facilitated to ensure a diverse local economy is created that ensures that the benefits of growth are spread across the population rather than being focussed solely in one sector or location. This will help to balance social and economic inequalities across the Greater Cambridge area.</p> <p>The ongoing ability of Greater Cambridge to provide economic growth and the faster than envisaged highlighted by the CPIER mean that the Councils should look to draw on this opportunity to deliver better lifestyles for all those living and working in the wider region, and in particular to deliver benefits across the communities of Greater Cambridge.</p>	

Summary of issues raised in comments	Comments highlighting this issue
<p>New jobs should not only cover the options for different educational attainments (which should be strongly supported) but also cover a range of types of employment. We should not be an area of high tech jobs with the rest of the jobs effectively providing for the services support of these businesses and their employers, Working in creative (not just artistic but manufacturing/assembly) environments should be available those not wishing to fly a desk.</p>	<p>58258 & 58263 (Histon & Impington PC)</p>
<p>The Local Plan must effectively tackle poverty and inequality in Greater Cambridgeshire. Further growth in the 'high technology cluster' will not address these problems and risks inflating the 'Cambridge bubble' further, putting a decent standard of living even further out</p>	<p>60788 (Cambridge and South Cambridgeshire Green Parties)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>of reach for a majority of people. Unemployment is not a helpful metric when people hold down multiple jobs but having to choose between heating and eating.</p>	
<p>Need to train resident population to their highest level to meet the needs of professions in this area.</p>	58465 (Linton PC)
<p>Support for Start-ups is also important hence small low rent offices/ premises for start-ups should also be supported.</p>	58258 (Histon & Impington PC)
<p>To ensure a wide range of jobs is available across Greater Cambridge and encourage economic growth, it will be important for the Local Plan to be flexible in its approach to commercial, retail and leisure uses. This is in line with the NPPF (paragraph 81) and the new Use Class E.</p>	57320 (Abrdn), 57275 (Universities Superannuation Scheme - Commercial), 58018 (Universities Superannuation Scheme (Retail))

Summary of issues raised in comments	Comments highlighting this issue
<p>Beyond the wider water resource / supply issue, no substantive comments on the other proposed policies. However, policies will need to include appropriate requirements to ensure that all development avoids adverse impact to the natural environment and delivers net gains for biodiversity in accordance with the requirements of policy BG/BG: Biodiversity and geodiversity.</p>	<p>59986 (Natural England)</p>
<p>There is little about protecting the rural economy, just new businesses in a rural setting. There appears to be no other vision rather than commercialising, meaning no maintenance or protection of existing business. More skills and families are leaving the rural economy as rural landscapes are developed.</p>	<p>59165 (Great Shelford PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
Concerned about the scale of economic growth in the area and its use to drive large amounts of housing growth well about what would be required in other planning areas.	60137 (Christopher Blakeley)
The area needs much better broadband and mobile phone reception to enable remote and home working.	59165 (Great Shelford PC)
New areas of substantial employment MUST have a good transport infrastructure.	58261 (Histon & Impington PC)
Where the proposal is to develop prime agricultural land in the green belt it cannot be deemed to be 'protecting the best agricultural land or supporting the rural economy.	57547 (Stapleford PC)
58,500 new jobs by 2041 is "pye in the sky" and outrageous. Where are the grounds for that.	57580 (D Lott)

Summary of issues raised in comments	Comments highlighting this issue
<p>Policy S/JH considerably underestimates and fails to meet the need for employment floorspace, particularly Class B8 logistics floorspace in Greater Cambridge, and that the proposed Policy J/NE restriction on the provision of large-scale regional and national warehousing and distribution within the area is contrary to economic trends, market evidence and the scale of economic ambition for the Region.</p>	<p>59302 (Avison Young)</p>
<p>No comment</p>	<p>57424 (Huntingdonshire District Council)</p>

Site related Representations for Jobs

Summary of issues raised in comments	Comments highlighting this issue

<p>One employment area we find significant and interesting is the expansion of Cambridge Science Park to the land East of Impington. This was put forward in the call for sites.</p>	<p>58261 (Histon & Impington Parish Council)</p>
<p>Marshall's vision for Cambridge East strongly aligns with the Local Plan's aim to encourage a flourishing and mixed economy in Greater Cambridge, which provides for a wide range of jobs whilst maintaining the area's global reputation for innovation. As a successful business that has been rooted within Cambridge for over 110 years, Marshall is keen to deliver a scheme at Cambridge East that is truly mixed-use and provides employment opportunities at all levels across a range of uses.</p> <p>Marshall has a long legacy of investing in skills. Cambridge East will build on the</p>	<p>58566 (Marshall Group Properties)</p>

<p>established and respected Marshall Apprenticeships by providing a wealth of skills, education and lifelong learning opportunities for people of all socio-economic backgrounds and academic abilities, equipping them for a life of self-sufficiency and ensuring that everyone is able to fulfil their true potential.</p>	
<p>The proposals to promote mixed use development, including residential uses on land towards the east of Melbourn would potentially reduce the prospect of further growth or expansion of the successful employment areas where high-technology, research and development and related facilities are now well-established.</p> <p>Unlike more conventional employment premises, the research and development sector is one where there is significant</p>	58798 (Phase 2 Planning)

potential for growth and one where growth would support and fund additional development.

The proposed allocation of the land adjacent to the existing Science Park for mixed use development (with only 2.5 hectares of the total site area of 6.5 hectares identified for employment use), would potentially restrict the future growth and expansion of this key sector. The proposed allocation represents a unique source of land for the expansion of the Science Park while it is not necessarily the most suitable site for residential development in Melbourn or Meldreth.

Policy J/NE: New employment and development proposals

Hyperlink for all comments

Open this hyperlink - [Policy J/NE: New employment and development proposals](#)> then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

45

Abbreviations

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

Executive Summary

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

Babraham Research Campus Ltd broadly supported the policy but asked that policy wording is clearly written to confirm that employment development will be supported in policy areas in the countryside. Other respondents sought amendments to policy

areas, such as at Granta Park. Gamlingay Parish Council asked that proposals are proportional in scale and retain the character of the rural area so that they correspond with Gamlingay's Neighbourhood Plan.

Some individuals perceived there to be enough employment in the area and thought that facilitating more jobs would create a need for more homes. Contrastingly, other respondents, mainly developers and landowners, perceived the policy to be too restrictive, and that greater flexibility was required. Some argued that the policy should do more to support clusters, and allow more employment development in various locations. Endurance Estates argued that the emerging policies for industrial development would suppress demand. The same respondent argued that the employment land evidence base underestimates the actual need for Class B2 and B8 uses. Similarly, Newlands Developments argued that the Plan needs to account for increasing growth in the research and innovation, logistics and advanced manufacturing sectors especially in the context of the Oxford-Cambridge Arc. Tritax Symmetry stated that the failure to address logistics floorspace will lead to increased vehicle miles as businesses and households are supplied from facilities further away. A few developers, including Lolworth Developments Limited, stated that the Plan does not meet NPPF's requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales.

The Education and Skills Agency asked for the policy to recognise the direct and indirect skills and employment benefits of education facilities. BioMed Realty asked for the policy to support the needs of clusters and proactively recognise opportunities for some densification to make best use of established R&D Parks, and that policies within the emerging local plan should explicitly support employment development. Hallam Land Management Limited argued that there should also be consideration of data centres. There were a few site-specific comments where developers promoted their land as a suitable place to deliver the policies. There were also objectors such as Trumpington Resident Association who argued that certain sites were not appropriate for development.

Representations for Policy J/NE: New employment and development proposals

Summary of issues raised in comments	Comments highlighting this issue
Support	57730 (Bassingbourn-cum-Kneesworth PC), 60261 (Cambridge Innovation Parks Ltd)
Support the ambitions for the Local Plan to encourage a flourishing and mixed economy in Greater Cambridge which includes a wide range of jobs.	58220 (Universities Superannuation Scheme - Retail), 57232 (Abrdn), 57277 (Universities Superannuation Scheme - Commercial)
Agree with the policy direction that employment development under E(g), B2 and B8 use classes, will be supported in the plan.	57423 (Mission Street Ltd)
Support the direction that employment development will be supported in towns and villages where it is of an appropriate scale and character to their location and scale of settlement.	57423 (Mission Street Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Support the consideration of employment proposals on their merits, where they are of an appropriate scale, character and in an accessible location.	58874 (CBC Limited, Cambridgeshire County Council and a private family trust)
Support the policy principles of prioritising new employment development in Cambridge within the mixed use Areas of Major Change such as Cambridge Biomedical Campus.	58874 (CBC Limited, Cambridgeshire County Council and a private family trust)
Support the approach towards new and additional employment premises in villages and specified locations within the countryside as this will offer scope for increasing and diversifying local employment opportunities across the wider Greater Cambridge area potentially reducing the need to commute and supporting the viability of smaller communities	57425 (Huntingdonshire District Council)

Summary of issues raised in comments	Comments highlighting this issue
<p>Support the intended purpose of this policy, which is to identify suitable locations for employment proposals and potential uses that might be acceptable in these locations. There are clear sustainability benefits to focusing employment development at appropriate and accessible locations that are well-linked with existing and committed transport links.</p>	<p>58570 (Marshall Group Properties)</p>
<p>Broadly supported but future policy wording should be clearly written to confirm that employment development will be supported in defined 'Policy Areas in the countryside'</p>	<p>58088 (Babraham Research Campus Ltd)</p>
<p>it is entirely appropriate that the proposed policy direction within the Greater Cambridge Local Plan is one that simply assesses the appropriate scale and</p>	<p>60642 (Bruntwood SciTech)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>character having regard to its location and the scale of settlement.</p> <p>For developments within town and village settlement boundaries, it is the scale and character that are key to ensuring that the overall character of the settlement is maintained.</p>	
<p>Proposals and criteria need to be proportional in scale and character in a rural area as with Mill Hill GAM5 policy, Gamlingay Neighbourhood Plan</p>	<p>56641 (Gamlingay Parish Council)</p>
<p>The proposed policy should make clear that small to medium sized warehousing and distribution will be supported to meet the identified need.</p>	<p>57277 (Universities Superannuation Scheme - Commercial)</p>
<p>There is strong demand for B2/B8 floorspace in Greater Cambridge and</p>	<p>58602 (Endurance Estates - Caxton Gibbet Site), 59045 (Lolworth Developments Limited), 59301 (Avison</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>along the A428 corridor, but that demand is not being met.</p> <p>Demand has grown due to industrial expansions across Cambridgeshire in manufacturing, supply chain logistics and distribution, as well as the various technology sectors.</p> <p>Demand for large scale B8 warehousing is ever growing.</p> <p>There is very limited supply of industrial and distribution/warehouse floorspace, and the supply is not being provided in the area.</p>	<p>Young), 58376 (Hallam Land Management Limited), 60359 (H. J. Molton Settlement), 60399 (Tritax Symmetry)</p>
<p>The current and emerging policies for industrial development are restrictive, and suppress demand.</p>	<p>58602 (Endurance Estates - Caxton Gibbet Site)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Greater Cambridge is relying on other parts of the region to provide industrial and logistics premises.</p>	
<p>The employment land evidence base (the 2020 ELEDES) underestimates the actual need for Class B2 and B8 uses.</p> <p>Key issues:</p> <ul style="list-style-type: none"> -it does not properly take into account existing supply or market signals - it ignores the wider region/functional property market area relevant to Greater Cambridge. - There is insufficient consideration of the economic development needs of industrial occupiers in Greater Cambridge. - The failure to cover large/strategic premises which is contrary to economic 	<p>58602 (Endurance Estates - Caxton Gibbet Site), 59045 (Lolworth Developments Limited), 59301 (Avison Young), 60688 (Newlands Developments)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>trends, market evidence and the scale of economic ambition for the Region</p> <ul style="list-style-type: none"> - The requirements for storage and distribution floorspace are at least 50% to 115% lower than the level of need within Greater Cambridge when considering the latest data, and applying a more consistent approach in estimating employment needs. - recent market and economic trends, particularly in terms of e-commerce has had an impact on demand for logistics floorspace. - Covid and the growth in online sales - the role of logistics in helping to Build Back better after Covid - Brexit, has resulted in increased needs in the food, 3PL, pharmaceutical and healthcare sectors – all of which require 	

Summary of issues raised in comments	Comments highlighting this issue
<p>additional capacity for storage and distribution of inventory.</p> <ul style="list-style-type: none">- Demand from new employers. <p>European distributors and retailers, who pre-Brexit serviced the UK market from the continent, are now actively seeking warehouse premises to create a UK hub</p> <ul style="list-style-type: none">- Demand for large logistics space has also been driven by new activities and sectors that have emerged in recent years.- Growing consumer demand and a focus on shorter delivery timeframes has meant that e-commerce is reshaping the traditional distribution network within the UK	

Summary of issues raised in comments	Comments highlighting this issue
<p>The employment land evidence for B2/B8 uses should be updated and amended.</p> <p>Alternative estimates include:</p> <ul style="list-style-type: none">- Savills estimate that more than 270,000 sqm of industrial floorspace is required over the plan period.- To avoid compromising the functioning of Greater Cambridge's economy and to avoid a sub-optimal distribution network resulting in longer journeys by road and higher vehicle emissions additional land of between 55.0 ha and 71.5 ha needs to be allocated which is suitable, available and deliverable across the Plan period to 2041.	

Summary of issues raised in comments	Comments highlighting this issue
<p>Greater Cambridge must now seek to properly assess and have regard to the requirements for storage and distribution operations of all scales and in suitably accessible locations in line with NPPF, taking account of the relevant FEMA and PMA, and to provide for such facilities. This requires a full assessment of strategic distribution needs, and an appraisal of all the available supply options to accommodate those needs, once identified.</p>	
<p>At the regional level there is ambitious plans for significant economic growth and development across the Oxford-Cambridge Arc and UK Innovation Corridor, including in the research and innovation, logistics and advanced manufacturing sectors to meet these</p>	<p>60688 (Newlands Developments)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>goals. This will need to be taken into consideration as part of future planning for the region alongside the particularly strong market demand for logistics space, the lack of existing supply that is suitable to cater for occupier's requirements and limited development opportunities in the pipeline as described further below.</p>	
<p>There is no evidential basis for the proposed restriction on large-scale regional and national warehousing and distribution within the area in draft Policy J/NE which is also contrary to economic trends, market demand, and national planning policy guidance.</p>	<p>59301 (Avison Young), 60688 (Newlands Developments)</p>
<p>The Plan does not meet NPPF's requirement for planning policies to accommodate the bespoke locational</p>	<p>59045 (Lolworth Developments Limited)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>requirements for storage and distribution operations of all scales, and the PPG's guidance in 'How can local authorities assess need and allocate space for logistics?' (Paragraph 31).</p> <p>The lack of the evidential basis to robustly justify the emerging Policy J/NE stating that large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge clearly undermines the soundness of the Plan as currently proposed.</p>	
<p>While the plan is seeking to provide a range of new employment space this will not, together with the existing allocations, provide a good range in the type, size and location of sites that respond to the</p>	<p>60399 (Tritax Symmetry)</p>

Summary of issues raised in comments	Comments highlighting this issue
needs of businesses. A range of employment sites must be able to cater for the needs of the logistics sector and provide sites of at least 10ha close to the SRN. A single warehouse of 25,000 sqm (which is below the current market average) requires a site of around 10ha.	
Not meeting the needs for industrial and strategic logistics within Greater Cambridge is contrary to national guidance.	58602 (Endurance Estates - Caxton Gibbet Site)
Policy restriction on large scale regional and national warehousing and distribution within the area in Policy J/NE should be removed to align with national planning policy guidance	59301 (Avison Young), 60688 (Newlands Developments)
To not plan appropriately for large scale B8 warehousing risks placing increased	58376 (Hallam Land Management Limited)

Summary of issues raised in comments	Comments highlighting this issue
and unintended pressure on existing / planned employment floorspace.	
Failure to address the logistics floorspace needs of Greater Cambridge will lead to increased vehicle miles as businesses and households are supplied from facilities further away. There will also be greater stress on businesses seeking to fulfil orders from greater distances.	60399 (Tritax Symmetry)
The locations supported for E(g), B2 and B8 uses under J/NE i.e. in Cambridge Within towns and villages, Close to but outside settlement boundaries of villages, In defined 'established employment areas in the countryside' and In the countryside for the expansion of existing businesses) are not appropriate for either general industrial uses or for logistics development. The plan is looking to	60399 (Tritax Symmetry)

Summary of issues raised in comments	Comments highlighting this issue
impose a blanket prohibition on large scale national and regional warehousing and distribution centres in Greater Cambridge.	
Greater Cambridge will need to consider whether regional distribution centres are being provided in sustainable locations in adjoining authority areas to meet any regional need before unilaterally abdicating responsibility to meet regional needs.	60399 (Tritax Symmetry)
The Plan needs to reflect the current and future needs of the logistic industry as that need is now manifesting itself, post Covid and post Brexit. Large sustainable sites close to the SRN need to be identified in a planned way.	60399 (Tritax Symmetry)

Summary of issues raised in comments	Comments highlighting this issue
There should be consideration of data centres for which demand is growing and which tend to compete for B8 floorspace.	58376 (Hallam Land Management Limited)
Due to widening gap between the supply of and demand for industrial space the policy direction which encourages employment development at appropriate scales on village boundaries is supported.	59301 (Avison Young)
New areas of substantial employment must have a good transport infrastructure.	58262 (Histon and Impington PC)
To provide flexibility to take into account the long-term connectivity and travel projects or other such contextual development that may better enable long term sustainable transport opportunities recommend that the text below is included:	57423 (Mission Street Ltd)

Summary of issues raised in comments	Comments highlighting this issue
<p>"A degree of flexibility will be provided when considering the accessibility and transport options available to a proposal for employment development, to consider nearby short, medium and long term sustainable transport projects that may influence the sustainability of a proposal beyond the nearby infrastructure currently available."</p>	
<p>It should be made clear that co-location is an acceptable way to help meet both the warehousing and distribution and housing needs in the area.</p>	<p>57277 (Universities Superannuation Scheme - Commercial)</p>
<p>Recognise preference for brownfield land but such land can have high biodiversity value which needs to be mitigated.</p>	<p>58877 (Cambridge Past, Present & Future)</p>
<p>In order to encourage a flourishing and mixed economy in Greater Cambridge which includes a wide range of jobs it is</p>	<p>58220 (Universities Superannuation Scheme - Retail), 57232 (Abrdn), 57277</p>

Summary of issues raised in comments	Comments highlighting this issue
important that proposed policy allows flexibility for employment uses. This would be in accordance with Paragraph 82 of the NPPF.	(Universities Superannuation Scheme - Commercial)
<p>In order to support economic growth, innovation and to strengthen the strategic role and reputation of Greater Cambridge it is vital that the policies are drafted with sufficient flexibility including:</p> <ul style="list-style-type: none"> • To allow the benefits of a proposal to provide a world-class bio-medical facility (and employment opportunities) outside a settlement boundary/development framework to be balanced against any conflict with policy in this regard, particularly where it meets high standards of sustainability. 	57528 (Mr Henry d'Abo)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"><li data-bbox="562 316 1093 624">• To afford great weight in the determination of a planning application to the economic and wider needs case for bringing forward a bio-medical facility (and employment opportunities)<li data-bbox="562 647 1093 956">• To give great weight to the ability to bring forward an innovative and comprehensive manifesto of sustainable travel measures to support a proposal in the rural area<li data-bbox="562 979 1093 1347">• To support proposals for employment uses which also provide associated land uses such as shops, creche and cafés should, where these uses are open to the wider community. And deliver significant community	

Summary of issues raised in comments	Comments highlighting this issue
benefit and improve the sustainability credentials of the local area.	
Whilst recognising the intense demand for employment space in Greater Cambridge, recommend the councils take a pragmatic approach to new employment development which recognises the longer-term ability for E(g) uses to change to education, and the benefits education brings to the local labour market.	57487 (ESFA - Department for Education)
Some flexibility in the policies and site allocations is requested, recognising the direct and indirect skills and employment benefits of education facilities such as Cambridge Maths School.	57487 (ESFA Department for Education)
The Government recently introduced the new Use Class E to promote flexibility in	58220 (Universities Superannuation Scheme - Retail), 57232 (Abrdn), 57277

Summary of issues raised in comments	Comments highlighting this issue
<p>town centres. It is crucial that the Local Plan does not seek to restrict sub-uses within the wider Use Class E. This would be in direct conflict with the aims of Use Class E and would therefore be unlikely to be considered sound by a Planning Inspector during examination.</p>	<p>(Universities Superannuation Scheme - Commercial)</p>
<p>It is essential that a more ambitious approach is taken in seeking to capture and accommodate the substantial demand in office, R&D, lab and associated manufacturing space in the Greater Cambridge area. There is a need to provide sufficient supply in order to meet the balanced homes/jobs requirements and to reflect the high employment density and employment skills these uses engender.</p>	<p>60160 (U&I PLC and TOWN), 60767 (U+I Group PLC)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The Higher Growth option should be pursued to reflect the Combined Authority's commitment to doubling GVA by 2040 and capitalise on the significant appetite for research/knowledge-based, commercial development in the City.</p>	
<p>The focus on local employment opportunities outside defined areas greatly limits the opportunity to bring forward a major new innovation cluster as there is little support or flexibility for this.</p>	<p>58022 (Imperial War Museum/Gonville and Caius College)</p>
<p>GCLP should continue with South Cambridgeshire Local Plan Policy E/9 which provides a clearer and stronger strategic policy which permits employment clusters in suitable locations which draw on specialisms of Cambridge area in identified sectors and in...“other locally driven clusters as they emerge”.</p>	<p>58022 (Imperial War Museum/Gonville and Caius College)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>This would more closely accord with NPPF (Para 81 and 83). It would enable new innovation clusters in appropriate locations, and enable the area to continue as an engine for economic growth particularly in innovation sectors, also reflecting emerging OxCam ARC strategy.</p>	
<p>Support of continuation of the designation of established areas in the countryside including incorporation of Granta Park.</p>	<p>58720 (TWI)</p>
<p>The boundary to the Granta Park established employment area should be extended to include the area covered by the extant consent S/1110/15/OL which is subject to a reserved matters submission.</p>	<p>58721 and 58772 (TWI)</p>
<p>Policies in the Local Plan need to be flexible enough to supporting the needs of clusters and proactively recognise</p>	<p>58712 (TWI), 59298 (BioMed Realty)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>opportunities for some densification to make best use of established R&D Parks, including Granta Park.</p> <p>They need to recognise the growth opportunities on established Parks as they continue to evolve and be supportive of these, recognising the need to be able to respond to changing market below and re-invest in the existing built form.</p> <p>Policies within the emerging local plan should explicitly support employment development, and Granta Park should be being given similar weight to other campus developments.</p>	
<p>Policies should be put in place which are supportive of adaptation over time and a new policy be included such as an “opportunity area” that that recognises</p>	<p>58710 and 58756 (TWI), 59298 (BioMed Realty)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>opportunities afforded through the redevelopment of Granta Park, through both a rationalisation and upgrading of the existing building stock and the opportunities afforded to attract new occupiers through sensitive new development.</p> <p>The sustainability credentials of the site are changing through the significant infrastructure improvements that are being delivered improving connectivity to Cambridge, but also nearby settlements. This will open new opportunities for the Park to continue to evolve and make better use of the site.</p>	
<p>Given the need to plan for higher employment growth, the spatial approach and proposed allocations are somewhat</p>	<p>60277 (Commercial Estates Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
limited and do not fully explore the potential of South East Cambridge to support other existing clusters.	
Is it still appropriate for Cambourne Business Park to be an Established Employment Area in the Countryside given South Cambridgeshire District Council's aim to develop a large proportion of the site as residential?	59261 (Cambourne TC)
The Councils should not arbitrarily limit themselves at this key stage in the local plan process by not countenancing Green Belt release, particularly in those locations such as South East Cambridge where there is already an established employment cluster that could suitably accommodate further development.	60277 (Commercial Estates Group)

Summary of issues raised in comments	Comments highlighting this issue
There should be an explicit reference against development in the Green Belt, for example at CBC.	56991 (Trumpington Residents Association)
Large capacity for employment development in more suitable locations already exists and there is no need for CBC to expand into the Green Belt	56991 (Trumpington Residents Association)
There seems to be no mechanism for the Councils to control the extent of growth and the risks that high growth brings to the local society and the pressure it places for more homes. There is a risk that if the number of jobs grows at a faster rate than projected, there will be a demand for even more homes than currently planned.	56991 (Trumpington Residents Association)
Object. The policy should include provision for new other rural based enterprises such as equestrianism which	57043 (KWA Architects)

Summary of issues raised in comments	Comments highlighting this issue
have to be located in the rural area and which have significant economic and social benefits.	
Does not take the post pandemic ways of working into account. Office demand is becoming less with flexible working and hot-desking; shops are closing because of greater on-line purchasing.	59463 (S Buckingham)
There is already full employment in the area and facilitating more jobs just creates a need for more homes. True affordable homes are what is needed.	59463 (S Buckingham)
It is disingenuous to expect that the people moving into these new homes will be the same people as those taking the new jobs. Currently there are many residents who commute to jobs outside Cambridge and many others who work in	59463 (S Buckingham)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge but choose to live outside and commute in.	
The jobs that are desperately needed are green jobs: those that will enable existing homes to be retrofitted, and the training that accompanies them; and care jobs.	59463 (S Buckingham)
There is evidence that high-tech employment growth is actually damaging to low-skilled workers.	59463 (S Buckingham)
There seems to be too much emphasis on growing research and development jobs. There should be more zones for "ordinary" jobs for those who have not benefited from a university education.	58073 (B Marshall)
The concept of "Providing jobs near to residents" will only work where the pool of local residents is suitable for the employment. Businesses will not accept	57597 (R Pargeter)

Summary of issues raised in comments	Comments highlighting this issue
a requirement to recruit in a small geographical area.	
The plan does not support the employment growth to the south of the City with housing allocations within the RSC. This is a major failing of the Plan.	59146 (Grosvenor Britain & Ireland)
This has to be continuously worked on as a living document	60415 (Great and Little Chishill PC)
<p data-bbox="510 759 1108 1070">Any proposed development along or close to A505 will impact on North Hertfordshire, positively in terms of increased employment opportunities or negatively in terms of additional traffic using the A505.</p> <p data-bbox="510 1145 1108 1353">A10 is most direct route for North Herts residents to Cambridge and the Cambridge Biomedical Campus. With the Campus set to expand, residents in North</p>	58685 (North Hertfordshire District Council)

Summary of issues raised in comments	Comments highlighting this issue
Herts will be well placed to take jobs or use facilities at Campus. Additional trips by car on A10 would significantly negatively impact on Royston.	
There is not enough information to comment	56760 (Croydon PC)

Site related Representations for Policy J/NE: New employment and development proposals

Summary of issues raised in comments	Comments highlighting this issue
Development at Hazlewell Court will allow for new employment opportunities in a variety of sectors, creating jobs for local people and helping to boost the Greater Cambridge economy. The site is also an established rural business park, and there is an opportunity for this	57200 (R Cowell)

<p>provision to be expanded. This small scale employment provision can also act as incubator units to help new businesses grow and we see this as a complementary role to the proposed larger scale commercial proposals at Slate Hall Farm, Bar Hill (Site URN 236).</p>	
<p>The Clifton Road Industrial Estate site allocation should be flexible enough to allow for some small to medium sized warehousing and distribution uses on the redeveloped site.</p>	<p>57277 (Universities Superannuation Scheme - Commercial)</p>
<p>The focus on local employment opportunities greatly limits the opportunity to bring forward a major new innovation cluster as there is little support or flexibility for this.</p>	<p>58022 (Imperial War Museum/Gonville and Caius College)</p>
<p>One employment area we find significant and interesting is the expansion of Cambridge Science Park to the land East</p>	<p>58262 (Histon and Impington PC)</p>

<p>of Impington. This was put forward in the call for sites.</p>	
<p>The Plan should allocate circa 50ha of land at Scotland Farm for employment uses. The HELAA Assessment finds the site suitable for employment, save in respect of archaeology and access. HLM would request this assessment be revisited in light of the evidence now available and submitted with these representations. Its allocation would be entirely consistent with national planning policy, particularly paragraphs 11a and 104. Aligning new jobs with C2C and the Scotland Farm Travel Hub, in an accessible location close to East West Rail, is entirely consistent with Government policy.</p>	<p>58376 (Hallam Land Management Limited)</p>
<p>Cambridge East has a number of characteristics that make it a unique opportunity for the area. The potential</p>	<p>58570 (Marshall Group Properties)</p>

exists for a combination of a research hub, space for all levels of education and the commercial space to accommodate both large scale global occupiers and the flexible, affordable space for the small, high growth businesses. It can include maker spaces, space for growing sectors that require mid-level skills, and the leisure and retail offer will provide opportunity for entry level jobs. This will create a mix of employment and training opportunities suitable for residents of different skill levels as Marshall can expand the offering of the Marshall Apprenticeship programme.

It offers economic and sustainability benefits that cannot be delivered elsewhere. It will make a significant contribution to the target of doubling GVA by delivering both more jobs and more

<p>productive jobs. It will attract and grow jobs in higher productivity sectors, transport investment will increase agglomeration effects across the city and investment in training will help existing residents boost their skills and productivity. The mix of jobs and types of employment floorspace to support these jobs at Cambridge East will be the subject of further discussion and testing with the GCSP.</p>	
<p>TWI, as an organisation, needs to adapt and evolve to changing market conditions and the research requirements of its member organisations, and reflect changing operational requirements and respond to poor environmental performance of some of their older building stock. There is likely to be requirements to repurpose or replace</p>	<p>58710 and 58756 (TWI), 59298 (BioMed Realty)</p>

some of the existing buildings on the site during the next 10-15 years.

TWI is undertaking a review of its business strategy and related space requirements, which are likely to flex and adapt over the life of this next Local Plan.

Would therefore encourage the Council to put in place policies which are supportive of this adaptation over time and a new policy be included such as an “opportunity area” that that recognises opportunities afforded through the redevelopment of the site, through both a rationalisation and upgrading of the existing building stock and the opportunities afforded to attract new occupiers through sensitive new development.

<p>The sustainability credentials of the site are changing through the significant infrastructure improvements that are being delivered improving connectivity to Cambridge, but also nearby settlements. This will open new opportunities for the Park to continue to evolve and make better use of the site.</p>	
<p>The provisions in the development plan need to give greater weight to the significance of Granta Park, but also recognise the need to provide flexibility to allow for the continued evolution of the park, and in doing so recognise the requirements of the Welding Institute.</p> <p>Policies within the emerging local plan should explicitly support employment development, and Granta Park should be being given similar weight to other campus developments.</p>	58712 (TWI)

<p>Future employment growth at the Cambridge Biomedical Campus is a nationally and internationally-significant opportunity for the Life Sciences sector and the future prosperity of Cambridge.</p> <p>Enabling the expansion of the Campus into the identified Major Area of Change is nationally important. The Campus is part of a thriving Life Sciences ecosystem within Cambridgeshire but is the only place where major hospitals are co-located with advanced research institutes, higher education, and the international headquarters of Life Sciences companies, and the only place where the full cycle of discovering, demonstrating and delivering healthcare innovations can be found in one place.</p>	<p>58874 (CBC Limited, Cambridgeshire County Council and a private family trust)</p>
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<p>Support the development of detailed criteria to ensure proposals for employment development will be acceptable. The nature of future employment development is anticipated to be agreed with GCSP as part of the Campus' Local Plan policies.</p>	
<p>The Cambridge Innovation Parks West proposals would directly respond to policy J/NE. It would contribute to the spatial distribution of employment land – providing significant and high-quality floorspace and shared campus-style facilities in a predominantly rural, yet sustainable location.</p>	60261 (Cambridge Innovation Parks Ltd)
<p>Given the need to plan for higher employment growth, the spatial approach and proposed allocations are somewhat limited and do not fully explore the potential of South East Cambridge to support other existing clusters. Land to</p>	60277 (Commercial Estates Group)

the South East of Cambridge provides an opportunity to deliver additional employment land in a sustainable location; fundamentally, it can facilitate growth despite its current location within the Green Belt.

As such, the Councils should not arbitrarily limit themselves at this key stage in the local plan process by not countenancing Green Belt release, particularly in those locations such as South East Cambridge where there is already an established employment cluster that could suitably accommodate further development. The expansion of the PTP cluster should be specifically supported by the GCLP, and the Green Belt release of such sites could in fact lead to more sustainable outcomes, for example by facilitating a nature network

<p>as discussed in the previous section, and by delivering jobs in close proximity to homes.</p>	
<p>In relation to Land to the east of Whittlesford Highway Depot in Whittlesford Bridge, commercial development of the site would provide a substantial boost to local job opportunities and would constitute a comprehensive expansion of the existing employment space along the site's western boundary. Furthermore, aligning with the aims of Policy J/NE and various other sustainability initiatives forwarded by the Greater Cambridge Partnership, development of the site would provide new commercial space with direct links to rail networks, therein reducing the need for incoming commuters to rely on their private cars.</p>	<p>60359 (H. J. Molton Settlement)</p>

<p>It is entirely appropriate given the proposed policy direction to acknowledge that the present use of Melbourn Science Park as a employment park is accepted and that the nature and scale of its existing character provides the opportunity for redevelopment to develop a much more modern approach to employment parks and to work alongside the authorities and the local community to develop a strong vision that continues the legacy of this part of the village to the village of Melbourn.</p> <p>Where Melbourn is identified as a Rural centre within the settlement hierarchy it is entirely appropriate that our client looks positively at the opportunities that exist for redevelopment of the park. Whilst the Local Plan similarly does not list Melbourn Science Park as one of the key</p>	60642 (Bruntwood SciTech)
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<p>employment sites outside the Green Belt as stated in the Local Plan 2018, supporting text to Policy J/NE states that development in locations which provide a range of suitable units, including for start ups, SME's and incubatory units will be supported.</p>	
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Policy J/RE: Supporting the rural economy

Hyperlink for all comments

Open this hyperlink - [Policy J/RE: Supporting the rural economy](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

13

Abbreviations

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

Executive Summary

There were less representations in response to this policy than other policies in the Jobs Chapter. The University of Cambridge and parish councils supported the policy. The Campaign to Protect Rural England (CPRE) stated that the policy should be strengthened and properly enforced, and KWA Architects argued the scope of the policy should not be limited to reusing and replacing buildings. Bassingbourn-cum-Kneesworth Parish Council stated that the policy should protect small rural employment sites, but not permit expansion into the countryside, and development should consider the impact of traffic on the rural road network and on net zero targets. Huntingdonshire District Council expressed concern over the deliverability of the policy in the context of the wide range of uses facilitated through the prior approval and notification process.

There were contrasting views about the role of bridleways, the CPRE argued that opening up of tracks and bridleways at scale will increase security risk to farms, whereas the British Horse Society asserted that a safe, well connected bridleway network should be seen as an important facility for economic, social and well-being.

Representations for Policy J/RE: Supporting the Rural Economy

Summary of issues raised in comments	Comments highlighting this issue
Object as the policy should not be limited to reusing and replacing buildings. Some valuable rural enterprises can require new buildings, e.g. equestrianism. These businesses support economic, health and environmental wellbeing.	57047 (KWA Architects)
A safe, well connected bridleway network should be seen as an important facility for economic, social and well being. It is an important source of diversification for farmers, a significant rural employer and good for health particularly for women.	56701 (British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
Grazing land is good for carbon sequestration.	
Concern over the deliverability of the policy in the context of the wide range of uses facilitated through the prior approval/ notification process,	57426 (Huntingdonshire District Council)
Supports the policy	56761 (Croydon PC), 56917 (Cllr Sargeant/West Wickham PC), 59009 (University of Cambridge), 60017 (Steeple Morden PC), 60093 Guilden Morden PC
Very important	60416 Great and Little Chishill PC
The policy should protect small rural employment sites, e.g. Melbourn Science Park and Bassingbourn Wireless Station, but not permit expansion into the countryside. Any development of these sites must consider the impact of traffic	57731 (Bassingbourn-cum-Kneesworth PC)

Summary of issues raised in comments	Comments highlighting this issue
on the rural road network and on net zero targets.	
The policy should be strengthened and properly enforced. The rural economy can be diversified but at its core are farmers and their interests must be protected. Opening up of tracks and bridleways at scale will increase the security risk to farms.	59583 (Campaign to Protect Rural England)
If proposals relate to solar or windfarms the policy need to relate back to CC/RE and protection of landscape.	58880 (Cambridge Past, Present & Future)
Waste- localised anaerobic digestion plants are needed to deal with local food and farming waste, animal waste, green waste, tree debris and grass cuttings- a strategic plan is needed across the Greater Cambridge area.	56642 Gamlingay PC

Policy J/AL: Protecting the best agricultural land

Hyperlink for all comments

Open this hyperlink - [Policy J/AL: Protecting the best agricultural land](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

29

Abbreviations

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

Executive Summary

Some parish councils, government and political organisations expressed support for the policy. However, Abbey Properties Cambridgeshire Limited questioned the need for this policy as they perceived it to already be included in national policy. A few respondents argued that the Plan's housing proposals could exacerbate climate change which would harm agricultural land. Similarly, the Campaign to Protect Rural England argued there should be no building on South Cambridgeshire land due to its potential to harm food production. Cambridge and South Cambridgeshire Green Parties asked for reassurances that this policy would not prevent habitat restoration projects on drained peat soils currently under agricultural use.

There were a few representations relating to specific sites; some argued that the policy would be contravened by the relocation of the Cambridge Waste Water Treatment Plant and the Cambridge Biomedical Campus proposals. Whereas some developers argued that there were clear instances when it would be necessary to build upon agricultural land and posited specific examples.

Representations for Policy J/AL: Protecting the best agricultural land

Summary of issues raised in comments	Comments highlighting this issue
<p>Support:</p> <ul style="list-style-type: none"> • Strongly, in the light of grade I peat soil requiring remedial action and the need for increased food security. • Critically important • As supported in the Sustainability Appraisal. • Very important and must be a priority 	<p>Individuals</p> <p>60138 (C Blakeley), 60417 (Great and Little Chishill),</p> <p>Parish Councils</p> <p>57740 (Bassingbourn-cum-Kneesworth PC), 56762 (Croydon PC), 56918 (Cllr. David Sargeant/West Wickham PC), 57948 (Ickleton PC), 59931 (Fen Ditton</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p>PC), 60018 (Steeple Morden PC), 60094 (Guilden Morden PC);</p> <p>Political organisations</p> <p>60789 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Welcome the recognition of soil as a valuable resource and key element of the environmental ecosystem which requires protection, in accordance with paragraph 174 of the NPPF.</p>	<p>59985 (Natural England)</p>
<p>The policies is contravened by:</p> <ul style="list-style-type: none"> • Allowing development at Honey Hill to facilitate the development of NEC • Cambridge Biomedical Campus 	<p>56508 (C Martin), 56992 (Trumpington Residents Association), 57540 (A Martin), 57560 (Save Honey Hill Group), 57623 (J Pratt), 58233 (J Mead)</p>
<p>The emerging Local Plan should support the principle of adopted Policy NH/3 by</p>	<p>57560 (Save Honey Hill Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
clearly identifying the corresponding agricultural land and Green Belt cost that would require allocation in the Local Plan as a consequence of the proposed North East Cambridge development to allow a comprehensive assessment to be made.	
There are potential conflicts between this policy and CC/CS which need to be explored	60789 (Cambridge and South Cambridgeshire Green Parties)
The NPPF states "Where significant development is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality"	56992 (Trumpington Residents Association)
Supported in principle however the plan should the emerging Local Plan should support the principle of adopted Policy NH/3 by being clear on the dependency of policy S/NEC North East Cambridge	57560 (Save Honey Hill Group), 58141 (M Asplin)

Summary of issues raised in comments	Comments highlighting this issue
on agricultural land use to ensure objective responses on land use.	
Support agricultural land protection which is above sea level, and has suitable sustainable drainage (above water table)	56643 (Gamlingay PC)
The proposed policy captures the importance of restricting development which could lead to the irreversible loss of the best agricultural land (Grades 1, 2 or 3a)	57560 (Save Honey Hill Group), 57623 (J Pratt)
The proposed policy is reinforced by the concerns raised in response to the First Conversation, regarding carbon sequestration, biodiversity, and our ability to meet our food growing needs.	57560 (Save Honey Hill Group), 57623 (J Pratt)
Agricultural land must be protected. The more land that is lost to development, the more carbon emissions due to importing food and building properties.	58035 (D Blake)

Summary of issues raised in comments	Comments highlighting this issue
Sea level rise will cause flooding of the Fens by 2100, the remaining agricultural land south of Cambridge will be damaged by EWR and its associated housing. Why do you implicitly support that?	57045 (W Harrold)
It is in the national interest to stop building on South Cambridgeshire land. It prevents food imports, will be required when climate change causes the Fens to flood reducing a key source of agricultural products for the UK.	59584 (Campaign to Protect Rural England - CPRE)
Policy needs to take account of alternative reversible uses of agricultural land e.g. equestrianism.	57048 (KWA Architects)
<p>There will be some instances where the loss of agricultural land will be required to meet development needs. This includes:</p> <ul style="list-style-type: none"> • Trumpington South 	57183 (Southern & Regional Developments Ltd), 57260 (European Property Ventures - Cambridgeshire), 58804 (Trumpington Meadows Land Company – TMLC - a joint venture

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> The relocation of the Cambridge WRC 	between Grosvenor Britain & Ireland – GBI - and Universities Superannuation Scheme – USS), 60468 (Anglian Water Services Ltd)
This policy is unnecessary as the use of best and most versatile land is included under national planning policy	58888 (Abbey Properties Cambridgeshire Limited)
The policy should be strengthened and properly enforced	59584 (Campaign to Protect Rural England - CPRE)
To protect the remaining carbon stock in our peatlands and restore them to a net carbon sink, significant land management changes will be necessary including allowing some rewetting of the peat soils. This will entail loss of agricultural yields (which must however be set against the total collapse of food production in the worst climate scenarios). Reassurance is sought that this policy would not prevent	60789 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
habitat restoration projects on drained peat soils currently under agricultural use.	
The policy does not provide any bespoke reference to renewable or infrastructure developments both of which are likely to require the use of such land given the locations of grid connections	58888 (Abbey Properties Cambridgeshire Limited)
No comment	57428 (Huntingdonshire District Council)

Site related comments for Policy J/AL: Protecting the best agricultural land

Summary of issues raised in comments	Comments highlighting this issue
The proposed allocation 'Trumpington South' is classed as being Grade 2 agricultural land across 98% of the site. TMLC considers the need for	58804 (Trumpington Meadows Land Company – TMLC - a joint venture between Grosvenor Britain & Ireland –

<p>development is sufficient to override the need to protect the agricultural value within the land.</p>	<p>GBI - and Universities Superannuation Scheme – USS)</p>
<p>Agree that the relocation of the Cambridge WRC including its sludge treatment operations from the NE Cambridge allocation would release a sustainable brownfield location for development. This inevitably then requires a justifiable trade- off between harm to Green Belt and the loss of agricultural land (Policy J/AL) and the benefits of releasing the site which if it did not occur would likely require development in Green Belt and on greenfield sites – albeit in less accessible and sustainable location(s).</p>	<p>60468 (Anglian Water Services Ltd)</p>

Policy J/PB: Protecting existing business space

Hyperlink for all comments

Open this hyperlink - [Policy J/PB: Protecting existing business space](#)> then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

13

Abbreviations

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

Executive Summary

There were not many representations submitted in response to this policy. Some individuals, developers, charities, and parish councils expressed support for the policy. Contrastingly, Croydon parish council argued that protecting business spaces should be considered on a case-by-case basis. A few developers, including Abrdn, argued that the policy should recognise the increasing importance of town centres catering for flexible uses, and that office uses are not always required. The same respondents also stated that re-developing brownfield land and re-providing existing uses alongside co-located residential uses is a better way to utilise land.

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

Representations for Policy J/PB: Protecting existing business space

Summary of issues raised in comments	Comments highlighting this issue
General support for policy.	56644 (Gamlingay PC), 57233 (Abrdn), 57733 (Bassingbourn-cum-Kneesworth PC), 58075 (B Marshall), 59585 (CPRE)
Should be considered on a case-by-case basis.	56763 (Croydon PC)
Policy J/PB will need to justify with evidence where loss is proposed. The policy should recognise that it is increasingly important for town centres to cater for flexible uses, and that office uses are not always required.	57233 (Abrdn), 58221 (Universities Superannuation Scheme (USS) (Retail)

Summary of issues raised in comments	Comments highlighting this issue
An effective way of better utilising land is to redevelop brownfield land and re-provide the existing uses alongside co-located residential uses.	57233 (Abrdn), 57278 (Universities Superannuation Scheme (USS) – Commercial), 58221 (Universities Superannuation Scheme (USS) (Retail))
Policy should ensure it does not restrict ongoing operation of existing uses in interim period before redevelopment.	57278 (Universities Superannuation Scheme (USS) – Commercial)
If business is required to relocate, accommodation needs to be available for employees who relocate.	57733 (Bassingbourn-cum-Kneesworth PC)
Protection for existing business space also needs to extend to ensure that expansion opportunities are supported. This includes ensuring that other development that is supported by the plan does not unduly constrain existing successful business sites.	58278 (DB Group (Holdings) LTD)
This policy is a high priority.	60418 (Great and Little Chishill PC)
No comment.	57430 (Huntingdonshire DC)

Site related comments for J/PB: Protecting existing business space

Summary of issues raised in comments	Comments highlighting this issue
<p>Hazlewood Court, Bar Road, Lolworth (Site URN 676) is currently used for commercial purposes, supporting a small but well-occupied rural business park. Proposal will allow for an increase in local employment opportunities and protection of business and employment and will help to develop a more inclusive economy. Development would have potential to support the sustainability of the existing business park through providing supporting services including hotels, conference and meeting space.</p>	<p>57208 (R Cowell)</p>
<p>USS intends to bring forward Clifton Road Industrial Estate for re-</p>	<p>57278 (Universities Superannuation Scheme (USS) – Commercial)</p>

<p>development within plan period; however, prior to its redevelopment existing tenants should not be restricted in the operation of their business.</p>	
<p>Marshall proposed development at Cambridge East will result in relocating existing business at Cambridge Airport. Marshall are considering options for retaining elements of business in Greater Cambridge/Wider Cambridgeshire which would align with the intention of Policy J/PB.</p>	<p>58577 (Marshall Group Properties)</p>

Policy J/RW: Enabling remote working

Hyperlink for all comments

Open this hyperlink - [Policy J/RW: Enabling remote working](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

20

Abbreviations

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

Executive Summary

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

D Lister argued that policies to support work hubs where remote workers from different companies can come together. The University of Cambridge stated that it supports agile working, including the creation of agile working hubs on the University's estate. A few developers explained how their sites could support the aims of the policy.

Representations relating to J/RW: Enabling remote working

Summary of issues raised in comments	Comments highlighting this issue
General support for the policy	<p>District and parish Councils</p> <p>56645 (Gamlingay PC), 56764 (Croydon PC), 56919 (West Wickham PC), 59700 (Central Bedfordshire Council), 60019 (Steeple Morden PC), 60095 (Guilden Morden PC)</p> <p>Landowners and Developers</p> <p>58080 (B Marshall), 59531 (Countryside Properties – Bourn Airfield), 60530</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p>(Taylor Wimpey UK Ltd), 60590 (Countryside Properties – Fen Ditton site)</p> <p>Charities and Think Tanks</p> <p>57778 (Carbon Neutral Cambridge), 59586 (CPRE)</p> <p>Education Institutions</p> <p>59044 (University of Cambridge)</p> <p>Political Organisations</p> <p>60790 (Cambridge and South Cambridgeshire Green Parties)</p>
This is critically important to Greater Cambridge and neighbouring areas.	59934 (Fen Ditton PC), 60419 (Great and Little Chishill PC)
Home and remote working are important aspects of keeping rural communities economically sustainable in a manner	56919 (West Wickham PC), 57778 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
compatible with reducing carbon emissions.	
The policy in the SCDC Local Plan should be considered for wider implementation.	57734 (Bassingbourn-cum-Kneesworth PC)
Policy must be based on rigorous assessment of need.	60790 (Cambridge and South Cambridgeshire Green Parties)
Local employment hub demand may be effected by risk posed by COVID and future development not clear.	60790 (Cambridge and South Cambridgeshire Green Parties)
Residential extensions should be tested against proof of need.	60790 (Cambridge and South Cambridgeshire Green Parties)
Further exploration needed of funding models for employment hubs. Publicly funded hubs should be explored.	60790 (Cambridge and South Cambridgeshire Green Parties)
Support investment in communications infrastructure across the city to support the increase in remote working. This is	57847 (D Lister), 58266 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
essential as low speed broadband will result in home working not been practical.	
Consider that the policy could be strengthened to refer to the provision of home office space in new dwellings as the emphasis is currently on the delivery of external hubs or extensions of existing dwellings. Not everyone will be able to live in premises with a spare bedroom hence ensuring new homes have space for a desk is a minimal requirement to support home working.	58266 (Histon & Impington PC), 59700 (Central Bedfordshire Council)
Policies to support work hubs where "remote" workers from different companies can comingle also seems like a good idea, especially if close to residential sites.	57847 (D Lister)
The University has embraced remote working as a response to the pandemic	59044 (University of Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
<p>restrictions, and will continue to support agile working in the longer term, where appropriate to roles. This will include the creation of agile working hubs on the University's estate, for its operational purposes, but a successful permanent transition will also depend on the ability of staff to work remotely at home and/or at hubs.</p>	
<p>No comment.</p>	<p>57431 (Huntingdonshire District Council)</p>

Site related comments for Policy J/RW: Enabling remote working

Summary of issues raised in comments	Comments highlighting this issue
<p>The Bourn Airfield proposals will make appropriate provision to achieving the objectives of this policy through the</p>	<p>59531 (Countryside Properties – Bourn Airfield)</p>

Summary of issues raised in comments	Comments highlighting this issue
provision of co-working space and provision of fibre broadband to all homes.	
Whilst the policy does not place any requirements on new developments to consider this matter, it is highlighted that the development of Land north of Cambridge Road, Linton would benefit from homes that include provision of studies and include the necessary broadband services to easily facilitate home working.	60530 (Taylor Wimpey UK Ltd)
The Fen Ditton proposals will make appropriate provision to achieving the objectives of this policy through the provision of co-working space and provision of fibre broadband to all homes.	60590 (Countryside Properties – Fen Ditton site)

Policy J/AW: Affordable workspace and creative industries

Hyperlink for all comments

Open this hyperlink - [Policy J/AW: Affordable workspace and creative industries](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

16

Abbreviations

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

Executive Summary

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

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

Representations for J/AW: Affordable workspace and creative industries

Summary of issues raised in comments	Comments highlighting this issue
<p>Support</p> <ul style="list-style-type: none"> • Very important now and going forward. 	<p>Parish Councils</p> <p>57740 (Bassingbourn-cum-Kneesworth PC),</p> <p>Landowners or developers</p> <p>58580 (Marshall Group Properties), 59831 (Dry Drayton PC), 60161 (U&I</p>

	PLC and TOWN), 60278 (Commercial Estates Group), 60420 (Great and Little Chishill PC), 60768 (U+I Group PLC)
Support affordable workspaces but with greater affordability of 60% rather than the 80% in the policy.	58269 (Histon and Impington PC)
Support 20% affordable workspace if development is above 1,000m2	56646 (Gamlingay PC)
Local affordable workspace can reduce commuting and increase local employment opportunities	59587 (Campaign to Protect Rural England - CPRE)
The policy would increase access to affordable flexible spaces for start-up businesses and small and medium-sized enterprises (SMEs) across Greater Cambridge. This plays an important role in helping to address social inclusion.	60278 (Commercial Estates Group)
The requirements of Policy J/AW are questioned based on a lack of evidence justifying the level of affordable	57429 (Mission Street Ltd)

workspace and what scale of development should provide it.	
The policy is unnecessary and unreasonable. If a business cannot afford to occupy a commercial development then it will operate either from home or via an alternative route – perhaps hiring incubator type space on an irregular/as needed basis. It is not acceptable for a commercial development to subsidise workspace.	58895 (Abbey Properties Cambridgeshire Limited)
Clarity is required on: <ul style="list-style-type: none"> • Definition of affordable • How affordable workspace is to be calculated and applied across the districts • What constitutes a ‘larger commercial development’ 	56765 (Croydon PC), 57429 (Mission Street Ltd)
Flexibility should be included within the policy so that the rate of affordable workspace is proportionate to the scale of	57429 (Mission Street Ltd)

the development on a site by site basis
as:

- The job market and skills found within the London authorities cited will differ from Greater Cambridgeshire and therefore drawing the comparison and providing a blanket percentage requirement for affordable workspace across employment development will not necessarily be as appropriate within the unique circumstances of the area and the need may also vary depending on the surrounding uses and context.
- Employment space rents across the City and South Cambridgeshire differ greatly, depending on locations; indeed, it is this range of rents across types

<p>of product that provides the necessary ecosystem for research and development companies to thrive.</p>	
<p>Support the aims of this policy but concern that it will have the same problem as so-called “affordable” housing, i.e. that 80% of the market rate in Cambridge is still out of the reach of most. Ideally, the rate which is considered ‘affordable’ should be set through assessment of the ability of the target market to pay these rates.</p>	<p>60791 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Recommend that affordable workspace requirements are subject to viability to ensure otherwise marginal schemes are not unnecessarily restricted from coming forward.</p>	<p>57279 (Universities Superannuation Scheme - Commercial)</p>
<p>Provision of affordable workspace on-site is not always appropriate therefore the proposal to allow flexibility for financial</p>	<p>57279 (Universities Superannuation Scheme - Commercial), 60278 (Commercial Estates Group)</p>

contributions for equivalent off-site provision is supported	
No comment	57432 (Huntingdonshire District Council)

Site related comments for Policy J/AW: Affordable workspace and creative industries

Summary of issues raised in comments	Comments highlighting this issue
The proposals at Burlington Park will aim to deliver a diversity of research and development floorspace of different sizes and rental points, providing an alternative to other, high-rental location, whilst still being in the Southern Cluster. This would allow Burlington Park to support the local R&D ecosystem and help companies at all stages of their development continue to thrive.	57429 (Mission Street Ltd)

<p>Marshall is supportive of this policy intent and is committed to providing a scheme that offers a broad range of opportunities. The delivery of a wide range and mix of employment floorspace is an important consideration in the evolution of the design of Cambridge East. Marshall has instructed specialist commercial advisers to provide advice on what mix of uses Cambridge East should be looking to deliver. This advice will also serve to ensure that Cambridge East is both fit for today's requirements, but is also sufficiently flexible to ensure it is future proofed.</p>	58580 (Marshall Group Properties)
<p>The important role the policy would have in helping to address social inclusion and it would provide an additional benefit to Green Belt release in at Land to the South East of Cambridge.</p>	60278 (Commercial Estates Group)

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

Hyperlink for all comments

Open this hyperlink - [Policy J/EP: Supporting a range of facilities in employment parks](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

5

Abbreviations

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

Executive Summary

There were fewer representations attached to this policy than other policies in the Jobs Chapter. A few parish councils and landowners expressed support for the policy. Gamlingay Parish Council expressed support for the policy but asked for additions such as ensuring showering facilities and water refilling stations are required in all new employment facilities. The landowner CBC Limited, Cambridgeshire County Council and a private family trust argued that the Cambridge Biomedical Campus has a deficit in existing facilities and they supported the provision of flexible business spaces on the site to enable it to become more successful. The Cambridge and South Cambridgeshire Green Parties asked for green spaces to be included in employment parks.

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

Summary of issues raised in comments	Comments highlighting this issue
Support the principle of the policy.	<p>Individuals</p> <p>Parish Councils</p> <p>57740 (Bassingbourn-cum-Kneesworth PC)</p> <p>Landowners or developers</p> <p>56647 (Gamlingay PC), 58876 (CBC Limited, Cambridgeshire County Council and a private family trust)</p>
Showering facilities and water refilling stations are required in all new employment facilities.	56647 (Gamlingay PC)
Section 106 contributions are required.	56647 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
Investment support for active travel is required with development of all new business and employment.	56647 (Gamlingay PC)
No comment.	57433 (Huntingdonshire District Council)
The Campus has a deficit in existing facilities due to rapid development over time. Further supporting flexible business spaces will enable it to become more complete, dynamic and successful.	58876 (CBC Limited, Cambridgeshire County Council and a private family trust)
A range of green spaces should be provided in employment parks to ensure employees have access to nature for wellbeing, space to walk and use. Cambridge Science Park is an example where there is a duck pond and grass.	60792 (Cambridge and South Cambridgeshire Green Parties)

Policy J/RC: Retail and centres

Hyperlink for all comments

Open this hyperlink - [Policy J/RC: Retail and centres](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

20

Abbreviations

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

Executive Summary

Several respondents expressed support for the policy. Bassingbourn-cum-Kneesworth PC argued that the policy needed to have a greater focus on rural shops and services. ABRDN, the Universities Superannuation Scheme and the Education and Skills Funding Agency supported elements of the policy but objected to Article 4 Directions that restrict alternative uses, arguing that alternative uses improve vitality of city centres. Contrastingly, Cambridge Past, Present and Future argued that shops and services should be protected from change of use through removal of permitted development rights. A few developers, including ABRDN, disagreed with bullet point three of the policy, which states that the Council will resist the loss of retail or other town centre uses in existing centres and primary shopping areas, because this was not perceived to be sufficiently flexible to adapt to the contemporary economic

climate. Cambridge and South Cambridgeshire Green Parties argued that encouraging small-scale units in Cambridge may not be sufficient to attract the range of users mentioned in the policy.

Representations for J/RC: Retail and centres

Summary of issues raised in comments	Comments highlighting this issue
Support the principle of the policy.	57435 (Huntingdonshire District Council)
Support the protection of small high streets	56648 (Gamlingay PC)
This needs to be carefully assessed in light of the Covid changes that may now become permanent.	56766 (Croydon PC)
Abrdn supports: <ul style="list-style-type: none"> • ambition to update existing retail policies to reflect new Use Class E. • city centre approach to retail, recognising this is the most sustainable location for such uses. 	57235 (Abrdn)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • developing a specific approach to retail policy for Cambridge city centre, including its shopping centres. <p>Abrdn notes:</p> <ul style="list-style-type: none"> • use of policy J/RC to support retention of retail and leisure uses with revitalisation of high streets. • Critical policy allows sufficient flexibility for complementary uses in retail areas. Decline in demand for retail space means there needs to be an element of re-purposing and an increased leisure and residential offering. • Policy J/RC should support all uses within Use Class E. • In attached topic paper - evidence on key retail trends, including shift to 	

Summary of issues raised in comments	Comments highlighting this issue
<p>online shopping and resultant lower footfall in retail areas.</p> <ul style="list-style-type: none"> • City centres are evolving to becoming experiential destinations, with plethora of different uses. Changing dynamics and economics. Recognised by Government in changes it has introduced, such as the new Class E. • Welcomes Councils' offer to engage with investors about future ambitions for city centre. <p>Abrdn strongly objects to:</p> <ul style="list-style-type: none"> • Continued resistance to the loss of retail or other town centre uses in existing centres and primary shopping areas where it would undermine their vitality or ability to serve local communities 	

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> Article 4 Directions that restrict alternative uses, these often improve vitality of city centres by diversifying mix of uses and bringing more people in at different times of day. 	
<p>Supports the proposed approach to support retail within new mixed use developments which are located outside of district centres. This will be important to ensure new residents have local everyday facilities that can be accessed sustainably, for example by walking or cycling.</p>	<p>57280 (Universities Superannuation Scheme -Commercial)</p>
<p>Support for the diversification of uses on high streets. While education is not necessarily a town centre use, it can lead to significantly increased footfall in struggling retail areas.</p>	<p>57488 (ESFA Department for Education)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>CMS proposal will have up to 200 students aged 16-19, with a high degree of independence in shopping, eating out and supporting the night-time economy. We recommend that the final policy makes an allowance for education as a use which can support the long-term vibrancy and appeal of town and city centres. This would be consistent with the amended Use Classes Order which allows many town centre uses to be changed to a state-funded school without express planning consent. We recommend that Greater Cambridge policies accept the principles of that legislative framework, rather than attempting to block permitted development rights through Article 4 Directions.</p>	

Summary of issues raised in comments	Comments highlighting this issue
Policy should have a strong focus on supporting village shops and services.	57739 (Bassingbourn-cum-Kneesworth PC)
No mention of cycle safety. Need to improve cycle storage and cycle safety.	57867 (Histon and Impington PC)
<p>USS supports:</p> <ul style="list-style-type: none"> • ambition to update existing retail policies to reflect new Use Class E. • city centre approach to retail, recognising this is the most sustainable location for such uses. • non-Class E uses within the city centre such as cinemas and leisure facilities which can complement retail uses and ensure retail areas in Cambridge continue to flourish. • developing a specific approach to retail policy for Cambridge city centre, including its shopping centres. 	58222 & 58230 (Universities Superannuation Scheme -Retail)

Summary of issues raised in comments	Comments highlighting this issue
<p>USS notes:</p> <ul style="list-style-type: none">• use of policy J/RC to support retention of retail and leisure uses with revitalisation of high streets.• Critical policy allows sufficient flexibility for complementary uses in retail areas. Decline in demand for retail space means there needs to be an element of re-purposing and an increased leisure and residential offering.• Consumer demand is pivoting towards experience-led shopping destinations and accessible convenience-oriented retail places.• Submission of evidence on key retail trends, including shift to online shopping and resultant lower footfall in retail areas.	

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Policy J/RC should support all uses within Use Class E. • City centres are evolving to becoming experiential destinations, with plethora of different uses. Changing dynamics and economics. Recognised by Government in changes it has introduced, such as the new Class E. • Different retail areas operate in different contexts. • Welcomes Councils' offer to engage with investors about future ambitions for city centre. <p>USS strongly objects to:</p> <ul style="list-style-type: none"> • Continued resistance to the loss of retail or other town centre uses in existing centres and primary shopping areas where it would 	

Summary of issues raised in comments	Comments highlighting this issue
<p>undermine their vitality or ability to serve local communities</p> <ul style="list-style-type: none"> • Article 4 Directions that restrict alternative uses, these often improve vitality of city centres by diversifying mix of uses and bringing more people in at different times of day. 	
<p>Will the City Centre be able to support Leisure activities? Traditionally these are outside the city centre. If so, transport plan is essential to out of town leisure facilities.</p>	<p>58271 (Histon & Impington PC)</p>
<p>The hierarchy must include the centres in the new settlements and new communities. Facilities in these locations needs to be protected to serve the residents and prevent car journeys. Vital shops and services should be protected</p>	<p>58894 (Cambridge Past, Present & Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
from change of use through removal of permitted development rights.	
<p>There are empty shops.</p> <p>Public transport is too expensive which encourages people to travel in cars.</p> <p>Local Authorities are increasing charges for cars to travel in to the city centre, meaning there is nothing to encourage people into the town and city centres.</p> <p>There is a risk that the commercial centre of Cambridge will suffer considerably under current plans.</p>	59279 (Great Shelford Parish Council)
The policy should acknowledge the flexibility of Class E to support the revitalisation of high streets. Local authorities should be open to all manner of uses and mix of complimentary uses.	59308 (Brydell Partners)

Summary of issues raised in comments	Comments highlighting this issue
A positive and creative approach to town centres would enable delivery of housing and jobs in highly sustainable locations. Policy must be flexible to accommodate rapidly changing market conditions.	
The repurposing of buildings for residential use should be controlled by Local Planning Authority Building Control	59588 (CPRE)
Historic shopfronts can positively contribute to an area both aesthetically and economically. The restoration of a such shops has provided Derby with bespoke shopping leading to much larger footfall.	59682 (Historic England)
Support for small commercial/retail premises in rural communities	59711 (Caldecote PC)
Support update to polices on retail and leisure these should take account of changes due to Covid and empty spaces.	60793 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
Welcome 'establish a hierarchy of centres across Greater Cambridge'. In Cambridge 'encouraging small-scale units' may not be sufficient to attract the range of users mentioned.	

Site related comments for Policy J/RC: Retail and centres

Summary of issues raised in comments	Comments highlighting this issue
Marshall is pleased that the GCSP recognise that there is opportunity at Cambridge East to provide a range of retail and leisure services and facilities to serve the Greater Cambridge population.	58581 (Marshall Group Properties)
Supportive of the policy. The proposals for the expansion of the Campus will include an element of retail which will reduce journeys, support daily life on the Campus and meet residents' and employees' needs.	58884 (CBC Limited, Cambridgeshire County Council and a private family trust)

Policy J/VA: Visitor accommodation, attractions and facilities

Hyperlink for all comments

Open this hyperlink - [Policy J/VA: Visitor accommodation, attractions and facilities](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

14

Abbreviations

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

Executive Summary

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

Concern was expressed over the loss of housing to short terms letting accommodation. There were also concerns over the capacity of visitor attractions to accommodate increased visitor numbers, with the levels likely to grow given growing population in the area and the development of new visitor accommodation. There was a request that the policy should support well-designed, sustainable improvements to existing attractions and a suggestion that new visitor accommodation should be asked for a contribution to mitigate their impact. Greater clarity was requested regarding when new attractions would be acceptable in rural areas and concern that the policy would have the potential to conflict with the Plan’s green infrastructure policies.

Representations for Policy J/VA: Visitor accommodation, attractions, and facilities

Summary of issues raised in comments	Comments highlighting this issue
General support for the policy.	<p>Parish Councils</p> <p>57740 (Bassingbourn-cum-Kneesworth PC),</p> <p>Landowners or developers</p> <p>58023 (Imperial War Museum/Gonville and Caius College), 58584 (Marshall</p>

Summary of issues raised in comments	Comments highlighting this issue
	Group Properties), 58892 (CBC Limited, Cambridgeshire County Council and a private family trust)
Our County is an important tourist destination and so we should support all visitors and tourism.	60421 (Great and Little Chishill Parish Council)
No comment.	57436 (Huntingdonshire District Council)
This policy needs careful consideration as there is a danger of prime housing being made into Airbnb type of accommodation.	56767 (Croydon PC)
Visitor accommodation, attractions and facilities can complement retail uses. The city centre would be an appropriate location for such uses due to its transport links and proximity to visitor attractions. The proposed policy J/VA should set out that these uses will be appropriate in existing retail uses.	57238 (Abrdn), 57281 (Universities Superannuation Scheme – Commercial), 58223 (Universities Superannuation Scheme – Retail)

Summary of issues raised in comments	Comments highlighting this issue
<p>Attractions at Duxford including the museum, major air show events, conference and corporate hire facilities supplies the market for an on-site hotel, planning consent has been granted. Economic model identified under-supply of business and tourist accommodation and will contribute towards addressing this and supporting visitor economy.</p>	<p>58023 (Imperial War Museum/Gonville and Caius College)</p>
<p>Pleased that there is recognition that there are opportunities at Cambridge East to provide a range of retail and leisure services and facilities to serve the Greater Cambridge population.</p>	<p>58584 (Marshall Group Properties)</p>
<p>There is an identified need at the Campus for visitor accommodation, particularly for business activities but also for visitor use. Campus expansion could provide hotel space alongside a</p>	<p>58892 (CBC Limited, Cambridgeshire County Council and a private family trust)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>conference centre for which there is also an identified deficit. The Campus is in serious need of floorspace to allow for the mixing of different staff from different institutions to enable knowledge spill-over and idea sharing. A diverse development offer allows the Campus to move towards an interconnected and vibrant innovation district promoting collaboration and innovation.</p>	
<p>The policy should recognise that some natural and cultural visitor attractions have a carrying capacity beyond which they will be harmed. There appears to be a conflict in approach between 'supporting attractions which can be accessed by sustainable travel' and restricting tourist facilities and attractions which don't need to be in a rural location.</p>	<p>58930 (Cambridge Past, Present & Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
We would be concerned if these policies prevented the delivery of green infrastructure.	
Holiday accommodation has impacted on the supply of rented flats in central Cambridge. A number of companies have bought property near Cambridge Station and in South Petersfield and converted them to short-term lets. This policy needs to be stronger and more importantly enforced.	59219 (F Gawthrop)
Policy support should be provided for well designed, sustainable improvements and enhancements to existing visitor attractions. Many existing services and facilities are operating close to their limits (including visitor facilities at Trust properties) and the impact of additional population pressure on tourist facilities	59230 (National Trust)

Summary of issues raised in comments	Comments highlighting this issue
<p>and visitor attractions is likely to be harmful if such facilities are not able to flex or adapt to meet increasing demands.</p>	

Site related comments for Policy J/VA: Visitor accommodation, attractions, and facilities

Summary of issues raised in comments	Comments highlighting this issue
<p>Land at Hazelwood Farm, Lolworth (HELAA site 52680):</p> <p>The development of a hotel at Site URN 676, will contribute to the provision of tourist accommodation within Greater Cambridge, meeting this growing need, helping develop the local economy and delivering employment opportunities for the area, provide high quality</p>	<p>57225 (R Cowell)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>accommodation and remote work space.</p> <p>Proposals will complement the proposed strategic employment development on the adjoining land referred to as Slate Hall Farm, Bar Hill (Site URN 236). The provision of visitor accommodation would provide a support function with ancillary services that can further the sustainability of the proposed employment development.</p>	

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

Hyperlink for all comments

Open this hyperlink - [J/FD: Faculty development and specialist/language schools](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section:

12

Abbreviations

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

Executive Summary

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

Representations for Policy J/FD: Faculty development and specialist / language schools

Summary of issues raised in comments	Comments highlighting this issue
Support policy.	57741 (Bassingbourn-cum-Kneesworth PC), 59085 (Metro Property Unit Trust)
No comment.	57439 (Huntingdonshire District Council)
Support policy direction. We recommend that the supporting text makes a distinction between privately operated and state-funded education, due to changes of use under permitted development rights.	57489 (ESFA -Department for Education)
Object to the policy not housing students in family homes (esp. for language students). Family homes provide a source of income for those on low incomes and is beneficial as a learning experience for the student. Providing student accommodation worsens the learning experience and leads to more under-utilised facilities.	58079 (B Marshall)

Summary of issues raised in comments	Comments highlighting this issue
Any reduction in car parking must be backed up with a high-quality transport system.	58274 (Histon & Impington PC)
<p>ARU makes the following comments</p> <ul style="list-style-type: none"> • Proposed policy direction should begin "Recognising that they make a significant contribution to society, we propose to support new or enhanced faculty and specialist facilities/development in Greater Cambridge which meet the following requirements:.. " • Supporting text should better reflect ARU's role and plans. • It should be made clear that ARU "is developing a new masterplan for their Cambridge campus on East Road. This will focus on consolidation and refurbishment 	58373, 58389 & 58410 (ARU)

Summary of issues raised in comments	Comments highlighting this issue
<p>and/or redevelopment of campus buildings with further adaption to provide blended learning/teaching with a mix of on campus and off-site learning and teaching using digital technologies. Opportunities for expansion of the campus through new acquisitions is also being explored."</p>	
<p>We agree that Policy 43 of the Cambridge Local Plan (2018) has value and should be rolled forward into the Greater Cambridge Local Plan.</p>	<p>59096 (University of Cambridge)</p>
<p>"The use of family dwelling houses to accommodate students of specialist colleges and/or language schools only is not appropriate". The should be changed to 'not allowed'. This policy has</p>	<p>59294 (Frank Gawthrop)</p>

Summary of issues raised in comments	Comments highlighting this issue
previously operated to the detriment of local people.	

Site related comments Policy J/FD: Faculty development and specialist / language schools

Summary of issues raised in comments	Comments highlighting this issue
Supportive of the policy that supports new teaching hospital facilities and specialist faculty development. These are types of development will come forward as part of the future expansion of the Campus.	58893 (CBC Limited, Cambridgeshire County Council and a private family trust)