



Cambridge and South
Cambridgeshire Local
Plan - Consideration of
the National Planning
Policy Guidance with
respect of Employment
and Retail

RD/Strat/380

November 2014

ID	NPPG Paragraph	How this is addressed in the evidence base?
A	<p>Paragraph: 002 Reference ID: 2a-002-20140306</p> <p>Identify the future quantity of land or floorspace required for economic development uses including both the quantitative and qualitative needs for new development.</p>	<p>The SHMA identifies the objectively assessed need for jobs and homes taking account of economic forecasts.</p>
B	<p>Paragraph: 002 Reference ID: 2a-002-20140306</p> <p>Provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply.</p>	<p>The ELR Update 2012 (RD/E/020) and ELR Update 2013 (RD/E/030) identify the land and floorspace required for employment development over the Plan period for both districts. It also analyses and discusses the qualitative needs for new employment development over the plan period.</p>
C	<p>Paragraph: 003 Reference ID: 2a-003-20140306</p> <p>Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.</p>	<p>The Cambridge Retail and Leisure Update 2013 (RD/E/130) identifies the floorspace required for retail and leisure development over the plan period for Cambridge. It also analyses and discusses the qualitative needs for new retail development over the plan period. Cambridge acts as a sub-regional centre and meets the retail needs of many residents of South Cambridgeshire.</p> <p>In South Cambridgeshire, the 2008 Retail Study concluded that there would be capacity to accommodate the phased development of Northstowe for convenience shopping, and this would meet anticipated needs to 2021(at that time it was envisaged the town centre would be completed by 2021). The Cambridge Retail and Leisure Study Update 2013 (RD/E/130) also takes account of Northstowe, identifying the potential clawback of spending currently directed towards Cambridge. The Northstowe Town Centre planning application is currently being considered, which will determine the scale of retail in the settlement, and will be considered against policies in the Northstowe Area Action Plan. Retail needs will be an issue for future area action plans for the new settlements proposed in the Local Plan.</p> <p>The ELR 2012 (RD/E/020) analyses</p>

		employment land in terms of property market sub-areas (page 16, paragraphs 3.3-3.10) and the quality of the premises on offer. Conclusions are drawn at paragraph 3.45 and 4.20.
D	<p>Paragraph: 003 Reference ID: 2a-003-20140306</p> <p>Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.</p>	<p>The methodology used in the Population Housing and Employment Forecasts Technical Report (RD/Strat/080) ensures that all outlying scenarios are discounted from the analysis before a final population figure is arrived at; see section 6 of the report from which jobs and homes figures were derived.</p> <p>The approach taken in the Cambridge Retail and Leisure Update 2013 (RD/E/130) involved a baseline scenario and sensitivity testing. This was considered reasonable and proportionate.</p>
E	<p>Paragraph: 004 Reference ID: 2a-004-20140306</p> <p>The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.</p>	<p>The forecasts used in the objective assessment of need were unbiased and no constraints were applied to the assessment of need for employment and retail need.</p> <p>Policies in the submitted Plans were informed by evidence that also took account of relevant constraints (e.g. the City Centre Capacity Study, Employment Land Review etc).</p>
F	<p>Paragraph: 005 Reference ID: 2a-005-20140306</p> <p>There is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need. But the use of this standard methodology set out in this guidance is strongly recommended because it will ensure that the assessment findings are transparently prepared. Local planning authorities may consider departing from</p>	<p>The Technical Report (RD/Strat/080) uses a wide range of reputable datasets to provide a robust assessment of need. The methodology used in the Technical Report and SHMA (RD/Strat/090) conforms with the methodology set out in the NPPG as described in this document.</p>

	<p>the methodology, but they should explain why their particular local circumstances have led them to adopt a different approach where this is the case. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.</p>	
G	<p>Paragraph: 007 Reference ID: 2a-007-20140306</p> <p>Local planning authorities should assess their development needs working with the other local authorities in the relevant HMA or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.</p>	<p>The SHMA was jointly prepared by all local authorities in the Cambridge sub-regional housing market area which is also a functional economic area. The SHMA chapter dealing with objectively assessed needs (chapter 12: Forecasts for homes of all tenures) was published in May 2013 and is the key chapter of the SHMA supporting the Local Plans. The SHMA considers the full housing and jobs needs for the Cambridge Sub Region HMA as part of an integrated approach to future population, housing and economic needs. This is important given the strong links between jobs and homes in this growth area, where a high proportion of new homes are required to support forecast new jobs. The SHMA is supported by the Population, Housing and Employment Forecasts Technical Report¹.</p>
H	<p>Paragraph: 007 Reference ID: 2a-007-20140306</p> <p>Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their HMA but should co-ordinate future housing reviews so they take place at the same time.</p>	<p>Cambridge City Council and South Cambridgeshire District Council have a close functional relationship and have positively aligned the preparation of their plans as far as possible.</p> <p>Other authorities in Cambridgeshire are running to slightly different timescales for Plan preparation, but they have worked together appropriately to prepare evidence for plan making. The SHMA was jointly prepared.</p>
I	<p>Paragraph: 007 Reference ID: 2a-007-20140306</p> <p>Local communities, partner organisations, Local Enterprise Partnerships, businesses and business representative organisations, house</p>	<p>The ELR 2012 (RD/E/020) involved interviews with local businesses and agents.</p> <p>The Retail and Leisure Study Update 2013 (RD/E/130) involved a survey of households.</p>

¹ Population, Housing and Employment Forecasts Technical Report (Cambridgeshire County Council Research and Performance Team) (RD/Strat/080)

	builders, parish and town councils, designated neighbourhood forums preparing neighbourhood plans and housing associations should be involved from the earliest stages of plan preparation, which includes the preparation of the evidence base in relation to development needs.	There was also extensive participation in the plan making process by range of stakeholders, through workshops and consultation, as identified in the Councils respective Statements of Consultation (Cambridge: RD/Sub/C/080; South Cambridgeshire RD/Sub/SC/090).
J	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>In understanding the current market in relation to economic and main town centre uses, plan makers should liaise closely with the business community to understand their current and potential future requirements.</p>	<p>There has been thorough consultation with all relevant stakeholders including with the business community in order to better understand their current and potential future requirements. Specifically, the ELR 2012 (RD/E/020) involved interviews with local businesses and agents in order to inform the assessment of employment land needs.</p> <p>The Councils worked with City Centre Management, landowners and agents when working on the retail strategies in the Local Plans. Extensive consultation has provided ample opportunity for organisations and the public to influence these policies.</p> <p>There was also extensive participation in the plan making process by range of stakeholders, through workshops and consultation, as identified in the Councils respective Statements of Consultation (Cambridge: RD/Sub/C/080; South Cambridgeshire RD/Sub/SC/090).</p>
K	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>The recent pattern of employment land supply and loss to other uses (based on extant planning permissions and planning applications). This can be generated though a simple assessment of employment land by sub-areas and market segment, where there are distinct property market areas within authorities.</p>	<p>The ELR 2008 (RD/E/010) analysed past completions and losses of employment land², and this analysis identified the past historic pattern of losses of employment land in Cambridge and gains in South Cambridgeshire. This analysis looked at sub-areas and market segments within each authority area.</p> <p>This pattern of development was analysed further in the ELR 2012 (RD/E/020), which examined where losses had taken place and where there were areas of high demand (see paragraphs 3.3-3.17 & 3.45).</p>

² Employment Land Review 2008 (RD/E/010), maps 1-8; paragraphs 4.3-4.13, pages 33-37 and 4.82-4.85, pages 54-55

L	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>Market intelligence (from local data and discussions with developers and property agents, recent surveys of business needs or engagement with business and economic forums).</p> <p>Market signals, such as levels and changes in rental values, and differentials between land values in different uses.</p> <p>Public information on employment land and premises required.</p> <p>The locational and premises requirements of particular types of business.</p>	<p>The ELR 2012 (RD/E/020) was informed by a review of the commercial property market by Savills. This review examined how different property market areas functioned, cross-checked between local authority data and Savills' own economic data, and involved interviews with businesses and other stakeholders. This review included exploring rental yields and land values.</p> <p>The Cambridge Cluster at 50 (RD/E/060), commissioned by EEDA, also involved extensive interviews with the business community. The Cambridge Cluster at 50 study is a key piece of evidence base that has informed the Councils' Plans.</p>
M	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>Information held by other public sector bodies and utilities in relation to infrastructure constraints.</p>	<p>The Councils' Infrastructure Delivery Study (RD/T/010) and the Update (RD/T/020) were produced to accompany the Local Plans. These were used to identify infrastructure constraints. The production of these documents involved consultation with other public sector bodies and utilities.</p>
N	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>The existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (though it is important to recognise that existing stock may not reflect the future needs of business). Recent statistics on take-up of sites should be consulted at this stage, along with other primary and secondary data sources to gain an understanding of the spatial implications of 'revealed demand' for employment land.</p>	<p>Both the ELR 2008 (RD/E/010) and the ELR 2012 (RD/E/020) considered the existing stock of employment land and buildings. The ELR 2012 (RD/E/020) considered statistics on take-up as well as a range of other primary and secondary data. This is used to help inform the likely business needs and future market requirement for employment land.</p>
O	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>Identification of oversupply and evidence of market failure (e.g. physical or ownership constraints that prevent</p>	<p>The ELR 2012 (RD/E/020) also looked at physical and ownership constraints that may prevent sites coming forward. It does not identify any specific constraints, but does note the lack of speculative employment</p>

	<p>the employment site being used effectively, which could be evidenced by unfulfilled requirements from business, yet developers are not prepared to build premises at the prevailing market rents).</p>	<p>development in the area³.</p> <p>The ELR 2012 (RD/E/020) analyses which segments of the market are oversupplied and which are undersupplied and explores the quality and quantity of sites available in different sub markets. The ELR 2012 (RD/E/020) identifies issues in the supply of office space in Cambridge City Centre and the northern fringe in the medium term and difficulties in retaining industrial land in Cambridge when competing against higher value uses. The Plans responds to these issues by planning for significant new employment development around the new railway station at Cambridge Northern Fringe East, protecting offices throughout Cambridge and protecting industrial land in Cambridge.</p> <p>In combination with the Cambridge and South Cambridgeshire Transport Plan, the local plans aim to improve the accessibility of a number of business parks in South Cambridgeshire, which will support their ability to meet future needs.</p>
P	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>A simple typology of employment land by market segment and by sub-areas, where there are distinct property market areas within authorities, should be developed and analysed. This should be supplemented by information on permissions for other uses that have been granted, if available, on sites then or formerly in employment use.</p>	<p>The ELR 2012 (RD/E/020) did look at sub-areas and market segments (see chapter 3), it also examined the loss of employment land to other uses and made recommendations to combat this, particularly around the loss of industrial land (see paragraph 8).</p>
Q	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>When examining the recent take-up of employment land, it is important to consider projections (based on past trends) and forecasts (based on future scenarios) and identify occurrences where sites have been developed for specialist economic uses. This will help</p>	<p>The ELR 2012 (RD/E/020) and 2013 (RD/E/030) considered forecasts and past trends.</p>

³ ELR 2012 (RD/E/020) paragraphs 3.13, 3.26, 3.32 and 3.45

	to provide an understanding of the underlying requirements for office, general business and warehousing sites, and (when compared with the overall stock of employment sites) should form the context for appraising individual sites.	
R	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>Analysing supply and demand will allow plan makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied.</p>	The ELR 2012 (RD/E/020) identified particular demands, for example for offices in Cambridge ⁴ . The ELR explores the quality and quantity of sites available for different sub-markets ⁵ .
S	<p>Paragraph: 030 Reference ID: 2a-030-20140306</p> <p>Employment land markets can overlap several local authority areas.</p>	The ELR 2012 (RD/E/020) considered the Greater Cambridge area, comprising Cambridge and South Cambridgeshire, which is the focus of the Cambridge employment market. It does this in a comprehensive manner.
T	<p>Paragraph: 032 Reference ID: 2a-032-20140306</p> <p>Plan makers should consider forecasts of quantitative and qualitative need (i.e. the number of units and amount of floorspace for other uses needed) but also its particular characteristics (e.g. footprint of economic uses and proximity to infrastructure). The key output is an estimate of the scale of future needs, broken down by economic sectors.</p> <p>Local authorities should develop an idea of future needs based on a range of data which is current and robust. Authorities will need to take account of business cycles and make use of forecasts and surveys to assess employment land requirements.</p>	<p>The ELR 2012 (RD/E/020) analyses which segments of the market are oversupplied and which are undersupplied and explores the quality and quantity of sites available in different sub markets. The ELR 2012 identified issues in the supply of office space in Cambridge City Centre and the northern fringe in the medium term and difficulties in retaining industrial land in Cambridge when competing against higher value uses. The Plans respond to these issues by planning for significant new employment development around the new railway station at Cambridge Northern Fringe East, south of Fulbourn Road and at new settlements, protecting offices throughout Cambridge and protecting industrial land in Cambridge.</p> <p>The ELR 2012 considered the Cambridge area, comprising Cambridge and South Cambridgeshire, which is the focus of the</p>

⁴ ELR 2012 (RD/E/020) paragraph 3, page i

⁵ ELR 2012 (RD/E/020) chapter 3, pages 16-34

	<p>Emerging sectors that are well suited to the area being covered by the analysis should be encouraged where possible. Market segments should be identified within the employment property market so that need can be identified for the type of employment land advocated.</p> <p>The available stock of land should be compared with the particular requirements of the area so that 'gaps' in local employment land provision can be identified</p>	<p>Cambridge employment market.</p> <p>The ELR and the Plans are encouraging emerging sectors, such as clean tech.</p> <p>The ELR, and subsequently the Plans, have responded to the changing needs of businesses, providing greater flexibility to accommodate a mix of uses to support the evolving needs of businesses in the Cambridge Cluster.</p>
U	<p>Paragraph: 032 Reference ID: 2a-032-20140306</p> <p>Plan makers should consider:</p> <ul style="list-style-type: none"> • sectoral and employment forecasts and projections (labour demand); • demographically derived assessments of future employment needs (labour supply techniques); • analyses based on the past take-up of employment land and property and/or future property market requirements; • consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics. 	<p>The Councils considered sectoral jobs forecasts (labour demand) from the LEFM and EEFM.</p> <p>The Councils considered demographically and economically derived population forecasts to inform an integrated assessment of future employment needs (labour supply). Please see the Explanation of Objectively Assessed Need and Technical Report for more detail.</p> <p>The ELR 2008 (RD/E/010) and 2012 (RD/E/020) looked at past take-up rates, and a range of other data before considering conclusions.</p>
V	<p>Paragraph: 033 Reference ID: 2a-033-20140306</p> <p>The increasing diversity of employment generating uses (as evidenced by the decline of manufacturing and rise of services and an increased focus on mixed-use development) requires different policy responses and an appropriate variety of employment sites. The need for rural employment should not be overlooked.</p>	<p>The ELR 2012 (RD/E/020), and subsequently the Plans, have responded to the changing needs of businesses, providing greater flexibility to accommodate a mix of uses to support the evolving needs of businesses in the Cambridge Cluster.</p> <p>The plans also have policies protecting existing employment in order to ensure a range of employment opportunities and a variety of types of employment are encouraged in the rural area.</p>
W	<p>Paragraph: 033 Reference ID: 2a-033-20140306</p> <p>Labour supply models are based on population and economic activity</p>	<p>The EEFM produces jobs-led population (labour supply) forecasts which are not derived either from future population or housing stock.</p>

	<p>projections. Underlying population projections can be purely demographic or tied to future housing stock which needs to be assessed separately. These models normally make predictions for a period of 10 to 15 years. Plan makers should be careful to consider that national economic trends may not automatically translate to particular areas with a distinct employment base.</p>	<p>Both the EEFM and LEFM include consideration of a wide range of business sectors to produce jobs forecasts. At a local level in the EEFM, for example, the outlook for each sector reflects the national outlook for that sector, so the outlook, and pace of recovery, in each area depends on its sector mix.</p> <p>Forecasting did consider local economic indicators, applying different growth rates to different sectors.</p>
X	<p>When translating employment and output forecasts into land requirements, there are four key relationships which need to be quantified. This information should be used to inform the assessment of land requirements. The four key relationships are:</p> <ul style="list-style-type: none"> • Standard Industrial Classification sectors to use classes; • Standard Industrial Classification sectors to type of property; • employment to floorspace (employment density); and • floorspace to site area (plot ratio based on industry proxies). 	<p>All four key relationships were examined in the ELR 2008 (RD/E/010) and ELR 2012 (RD/E/020).</p>
Y	<p>Paragraph: 001 Reference ID: 2b-001-20140306</p> <p>Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.</p>	<p>The Retail and Leisure Study Update 2013 (RD/E/130) assesses the retail needs of Cambridge and the surrounding area in full. The Study monitors the different rates of development in the City Centre compared with out of Centre⁶. Due to uncertainty around the rise of internet shopping and the impact of new centres in major developments in South Cambridgeshire⁷, Cambridge City Council is planning to meet retail needs to 2022 and closely monitor the situation. This follows the recommendation from the Retail and Leisure Study Update 2013 (RD/E/130)⁸.</p>
Z	<p>Paragraph: 001 Reference ID: 2b-001-</p>	<p>The Cambridge Local Plan (RD/Sub/C/010)</p>

⁶ Cambridge Retail and Leisure Study Update 2013, Paragraph 7.49

⁷ Cambridge Retail and Leisure Study Update 2013, Paragraphs 7.59-7.62 and Table 7.3

⁸ Cambridge Retail and Leisure Study Update 2013, Paragraphs 9.24-9.25

	<p>20140306</p> <p>This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers.</p>	<p>sets appropriate parking standards within the City Centre. These reflect the consultation on parking standards undertaken in the Issues and Options 2 consultation. Pages 625-638 of the Cambridge Statement of Consultation (RD/Sub/C/080) give further detail of how these parking standards were arrived at. Parking charges are not a matter for the plan.</p>
AA	<p>Paragraph: 001 Reference ID: 2b-001-20140306</p> <p>The National Planning Policy Framework sets out two key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans.</p>	<p>Policy 6 in the Cambridge Local Plan requires the implementation of the sequential approach to retail and other main town centre uses.</p> <p>Cambridge City Council proposes using the same threshold proposed in the NPPF for testing the impact of out of centre retail floorspace (i.e. 2,500sqm). This follows the recommendation of the Retail and Leisure Study Update 2013 (RD/E/130)⁹.</p> <p>The South Cambridgeshire Submission Local Plan Policy E/21 and E/22 require implementation of a sequential approach to retail, and provide a retail hierarchy.</p>
AB	<p>Paragraph: 001 Reference ID: 2b-001-20140306</p> <p>The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy). It applies only above a floorspace threshold as set out in paragraph 26 of the National Planning</p>	<p>South Cambridgeshire proposes using thresholds of 500sqm or 250sqm to test the impact of out of centre retail floorspace. This reflects the rural nature of the district, and the potential impact of larger stores on village centres.</p>

⁹ Cambridge Retail and Leisure Study Update 2013 (RD/E/130), paragraph 9.49-9.50, page 110

	Policy Framework.	
AC	<p>Paragraph: 002 Reference ID: 2b-002-20140306</p> <p>A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a Local Plan, including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other Government Departments and the sector may be useful in producing such a strategy.</p>	<p>Together the vision for Cambridge to 2031, the strategic objectives and policies 6, 9, 10 and 11 in the Cambridge Local Plan (RD/Sub/C/010) form a positive vision and strategy for a successful Cambridge City Centre which supports economic growth and maintains Cambridge special character that underpins its success.</p> <p>Together the vision for South Cambridgeshire to 2031, the objectives and policies E/21, E/22 and E/23 in the South Cambridgeshire Local Plan (RD/Sub/SC/010) form a positive vision and strategy for retail uses in South Cambridgeshire.</p> <p>The Councils worked with City Centre Management, landowners and agents when working on the retail strategies in the Local Plans. Extensive consultation has provided ample opportunity for organisations and the public to influence these policies.</p> <p>The Cambridge Retail and Leisure Study Update 2013 is informed by the Portas Review 2011¹⁰.</p>
AD	<p>Paragraph: 003 Reference ID: 2b-003-20140306</p> <p>Any strategy should be based on evidence of the current state of town centres and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions:</p> <ul style="list-style-type: none"> • what is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. This assessment should cover a three-five year period, but should 	<p>The Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080) sets out how the strategy for provision of retail was arrived at, pages 96-107; 118-138.</p> <p>Policy 6 in the Cambridge Local Plan requires the implementation of the sequential approach to retail and other main town centre uses.</p> <p>The South Cambridgeshire Submission Local Plan Policy E/21 and E/22 require implementation of a sequential approach to retail, and provide a retail hierarchy.</p>

¹⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6292/2081646.pdf

	<p>also take the lifetime of the Local Plan into account and be regularly reviewed</p> <ul style="list-style-type: none"> • what is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability • can the town centre accommodate the scale of assessed need for main town centre uses? This should include considering expanding centres, or development opportunities to enable new development or redevelop existing under-utilised space. It should involve evaluating different policy options (for example expanding the market share of a particular centre) or the implications of wider policy such as infrastructure delivery and demographic or economic change • in what timeframe should new retail floorspace be provided? • what complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered? • how can parking provision be enhanced and both parking charges and enforcement be made proportionate, in order to encourage town centre vitality? <p>Strategies should identify changes in the hierarchy of town centres, including where a town centre is in decline. In these cases, strategies should seek to manage decline positively to encourage economic activity and achieve an appropriate mix of uses commensurate with a realistic future for that town centre.</p>	
AE	<p>Paragraph: 004 Reference ID: 2b-004-20140306</p> <p>Local planning authorities should take</p>	<p>The Cambridge Retail and Leisure Study Update 2013 (RD/E/130) looked at the following market signals that were taken into</p>

	<p>full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.</p>	<p>account when developing policy:</p> <ul style="list-style-type: none"> • Advice on economic outlook¹¹; • Research on internet shopping¹²; • Advice on sales efficiency¹³; • Modelling of space requirements¹⁴; • Surveys of floorspace and retail units¹⁵; • Published retailer requirements¹⁶; and • Household telephone survey¹⁷.
AF	<p>Paragraph: 005 Reference ID: 2b-005-20140306</p> <p>The following indicators, and their changes over time, are relevant in assessing the health of town centres:</p> <ul style="list-style-type: none"> • diversity of uses • proportion of vacant street level property • commercial yields on non-domestic property • customers' views and behaviour • retailer representation and intentions to change representation • commercial rents • pedestrian flows • accessibility • perception of safety and occurrence of crime • state of town centre environmental quality <p>Not all successful town centre regeneration projects have been retail led or involved significant new development. Improvements to the public realm, transport (including parking) and accessibility as well as</p>	<p>The Cambridge Retail and Leisure Study 2013 assesses the health of the City Centre¹⁸ against a number of criteria including:</p> <ul style="list-style-type: none"> • The range of facilities on offer; • The convenience and comparison offer; • Its accessibility and parking restrictions; • The quality of the shopping environment; • The representations of various retailers; • Safety; • The potential for environmental improvements; • Customers' views; • Vacancy rate; and • Scope for expansion. <p>The Cambridge Retail and Leisure Study 2013 (RD/E/130) also looks at the Local and District Centres¹⁹.</p> <p>The Cambridge Local Plan (RD/Sub/C/010) identifies the Fitzroy/Burleigh Street/Grafton Area of Major Change as capable of meeting the majority of Cambridge's retail needs to 2022, see policy 11.</p>

¹¹ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 14, Paragraphs 3.3-3.7

¹² Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 15, Paragraphs 3.8-3.10

¹³ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 17, Paragraphs 3.16-3.20

¹⁴ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 18, Paragraphs 3.21-3.23

¹⁵ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 26-27 & 31, Tables 4.3-4.6

¹⁶ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 32, Table 4.7

¹⁷ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 33-34, Paragraph 4.38

¹⁸ Cambridge Retail and Leisure Study 2013 (RD/E/130), Page 34, Bullets 1-5

¹⁹ Cambridge Retail and Leisure Study 2013, Section 5

	<p>other measures promoted through partnership can also play important roles.</p> <p>Any strategy should identify relevant sites, actions and timescales, and be articulated clearly in the Local Plan, where it can be considered by local people and investors. It should be regularly reviewed, assessing the changing role and function of different parts of the town centre over time.</p>	
AG	<p>Paragraph: 006 Reference ID: 2b-006-20140306</p> <p>It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in paragraph 26 of the National Planning Policy Framework.</p>	<p>Due to uncertainty around the rise of internet shopping and the impact of new centres in major developments in South Cambridgeshire²⁰, Cambridge City Council is planning to meet retail needs to 2022 and closely monitor the situation. This follows the recommendation by the Retail and Leisure Study Update 2013 (RD/E/130)²¹.</p>
AH	<p>Paragraph: 007 Reference ID: 2b-007-20140306</p> <p>Please see here for the World Tourism Organisation's definition of tourism.</p> <p>Tourism is extremely diverse and covers all activities of visitors. Local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When</p>	<p>The Cambridge Hotel Futures (RD/E/150) looking at identify the scale and nature of new hotel development required to meet the City's future business and leisure tourism needs through to 2031. This study engaged with hotel operators, Colleges and others at a workshop on 29 March 2012 (RD/E/150 – page 3, paragraph 1.1.3).</p>

²⁰ Cambridge Retail and Leisure Study Update 2013, Paragraphs 7.59-7.62 and Table 7.3

²¹ Cambridge Retail and Leisure Study Update 2013, Paragraphs 9.24-9.25

	<p>planning for tourism, local planning authorities should:</p> <ul style="list-style-type: none"> • consider the specific needs of the tourist industry, including particular locational or operational requirements; • engage with representatives of the tourism industry; • examine the broader social, economic, and environmental impacts of tourism; • analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and • have regard to non-planning guidance produced by other Government Departments. <p>Local planning authorities may also want to consider guidance and best practice produced by the tourism sector. Further guidance on tourism can be found on the Visit England website.</p>	
AI	<p>Paragraph: 009 Reference ID: 2b-009-20140306</p> <p>In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.</p> <p>The checklist below sets out the matters that should be considered when taking a sequential approach to plan-making:</p> <ul style="list-style-type: none"> • Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the 	<p>Cambridge City Council's strategy of meeting all comparison floorspace needs to 2022 within the City Centre (mainly at the Grafton) has meant that there has not been a need to apply the sequential approach. Policy 6 in the Cambridge Local Plan requires the implementation of the sequential approach to retail and other main town centre uses.</p> <p>The South Cambridgeshire Submission Local Plan Policy E/21 and E/22 require implementation of a sequential approach to retail.</p>

	<p>supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses</p> <ul style="list-style-type: none"> • Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed • If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on? <p>Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.</p>	
AJ	<p>Paragraph: 011 Reference ID: 2b-011-20140306</p> <p>Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.</p>	
AK	<p>Paragraph: 012 Reference ID: 2b-012-20140306</p> <p>The sequential test seeks to deliver the Government's "town centre first" policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations.</p>	<p>Cambridge City Council is planning to meet the full comparison retail needs to 2022; this is entirely within Cambridge City Centre's Primary Shopping Area. The plan does not meet the needs to 2031 due to uncertainty around the rise of internet shopping and the impact of new centres in major developments in South Cambridgeshire²², Cambridge City Council is planning to meet retail needs to 2022 and closely monitor the situation. This follows the recommendation</p>

²² Cambridge Retail and Leisure Study Update 2013, Paragraphs 7.59-7.62 and Table 7.3

		by the Retail and Leisure Study Update 2013 (RD/E/130) ²³ .
AL	<p>Paragraph: 013 Reference ID: 2b-013-20140306</p> <p>The purpose of the test is to ensure that the impact over time (up to five years (ten for major schemes)) of certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. The test relates to retail, office and leisure development (not all main town centre uses) which are not in accordance with an up to date Local Plan and outside of existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.</p>	<p>Cambridge City Council proposes using the same threshold proposed in the NPPF for testing the impact of out of centre retail floorspace (i.e. 2,500sqm). This follows the recommendation of the Retail and Leisure Study Update 2013 (RD/E/130)²⁴.</p> <p>South Cambridgeshire proposes using thresholds of 500sqm or 250sqm to test the impact of out of centre retail floorspace.</p>
AM	<p>Paragraph: 014 Reference ID: 2b-014-20140306</p> <p>If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres.</p>	<p>The Local Plans are based on meeting the assessed need for retail up to 2022 in accordance with the sequential approach. Issues around not meeting the needs to 2031 will be dealt with through vigilant monitoring and a Plan review in 2019.</p>

²³ Cambridge Retail and Leisure Study Update 2013, Paragraphs 9.24-9.25

²⁴ Cambridge Retail and Leisure Study Update 2013 (RD/E/130), paragraph 9.49-9.50, page 110