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Please complete the following section to indicate which part of the Options Report you are making a representation on.

Representation Details:

Document Title: INFORMAL PLANNING POLICY GUIDANCE OPTIONS REPORT: FOODSTORE PROVISION IN NORTH WEST CAMBRIDGE

Question OR Option OR Paragraph: OPTION B
(If commenting on a Question or Option, please provide the Question number or Option letter)

Please tick ONE box to indicate whether you support, object or are merely commenting on the Question / Option / Paragraph:

☑ SUPPORT   ☐ OBJECT   ☐ COMMENT

Please use a separate form for each Question, Option or Paragraph on which you wish to make a representation.

Written Justification for Objection, Support or Comment:
Please give details to explain your representation supporting, objecting or commenting on the Report. Please be as precise as possible (please continue on separate A4 sheet(s) if necessary).

PLEASE REFER TO THE COVER LETTER SUBMITTED
Summary of Representation:
Please summarise the main issues raised in your representation in no more than 100 words. For objections, include a summary of the change sought followed by the reasons for it (this summary will be included in Committee Reports). If you fail to summarise your representation, it will be summarised for you.

PLEASE REFER TO THE COVER LETTER SUBMITTED

Thank you for making a representation on the Informal Planning Policy Guidance Options Report: Foodstore Provision in North West Cambridge. Please ensure you have signed and dated the form on the front page, and then send it to either of the addresses shown below. Representations must be received before 5pm on Monday 18th October 2010.

Where should I send my form?

<table>
<thead>
<tr>
<th>Mrs Sara Saunders</th>
<th>Mrs Caroline Hunt</th>
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<tr>
<td>Planning Policy Manager</td>
<td>Local Development Framework Team Leader</td>
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<tr>
<td>Cambridge City Council</td>
<td>South Cambridgeshire District Council</td>
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<td>PO Box 700</td>
<td>South Cambridgeshire Hall</td>
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<td>Cambridge</td>
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The information collected will be processed in accordance with the Data Protection Act 1998. Please note that all forms will be available for public inspection and your details will be kept on a database. Your name and details will form an appendix to a Committee Report, which will be made available on our website and will therefore be searchable. By submitting a representation you are agreeing to these conditions.
Mrs Sara Saunders  
Planning Policy Manager  
Cambridge City Council  
PO BOX 700  
Cambridge  
CB1 0JH

13 October 2010  
Client Ref: [redacted]

Dear Mrs Saunders

Informal Planning Policy Guidance Options Report: Foodstore provision in North West Cambridge

On behalf of our client, Universities Superannuation Scheme (USS) Limited, we hereby submit representations to the Informal Planning Policy Guidance Options Report (hereafter referred to as the IPPG) on Foodstore provision in North West Cambridge.

The Grand Arcade shopping centre

USS is a major investor in the Grand Arcade shopping centre which is located in the heart of Cambridge City Centre.

The shopping centre comprises some 450,000 sq ft retail floorspace with 55 stores comprising fashion, beauty, home, food and childrenswear retailers and a 280,000 sq ft John Lewis flagship department store.

USS continues to actively promote the Grand Arcade Centre to prospective tenants and receives interest from a range of retail occupiers. However, this interest will only be realised now and in the longer term if the Council continues to support the Centre as a key retail location.

Principle of retail development in NW quadrant

USS has reviewed the IPPG. In principle USS supports the large scale development of the NW quadrant of Cambridge but only on the basis that the retail element of any such proposals does not compete with the city centre as the prime location for shopping to meet the needs of the City.

USS’ view therefore is that any retail development located within any part of the NW quadrant should be controlled in terms of both size and goods sold as well as the phasing of the development, to ensure that it does not compete with the city centre. In particular USS seeks to ensure that suitable restrictions are imposed on any retail development to restrict the amount of comparison goods retailing that takes place from within the NW quadrant.

The key background retail studies and policy documents referred to in the IPPG provide the basis for the delivery of "local shopping" "small supermarket", "shopping catering for local needs" in connection with
the development of the NW quadrant. The key objective in relation to retail states at para. 3.15 a: "To create sustainable communities with an appropriate provision of shopping and services in appropriate locations, to serve the new and existing population, and reduce the need to travel overall, particularly by car."

On the basis that the retail provision in the NW quadrant is aimed at serving local needs, and primarily food shopping, USS considers in response to Question 1 that the word "food" should be included after "of" and before "shopping".

USS considers there should be more emphasis and controls placed on any retail development within the NW quadrant to ensure that the policy basis and objectives for the area are maintained via the delivery of associated food shopping development aimed to meet local needs.

Split of convenience and comparison goods

The IPPG states that the Supplementary Retail Study (February 2010) assumes a 70:30 food (convenience) to non-food (comparison) split for a superstore of 3,500 sq m net, and for the supermarket sized stores (2,000 sq m net) a 75:25 convenience to comparison split is assumed (para 4.15).

In the Option A the IPPG assumes that all the net floorspace is convenience floorspace and there is no comparison floorspace.

In all the other Options the level of comparison floorspace will increase with the increase in size of the proposed units. USS accepts that a supermarket will include a small proportion of non food goods but a superstore is more likely to include a higher proportion of comparison floorspace which goes beyond meeting the needs of the local area, but instead will compete directly with the city centre.

Paragraph 4.20 of the IPPG suggests that the addition of large format foodstore provision in NW Cambridge will significantly reduce leakage of expenditure from the PCA, provide consumer choice and reduce the need to travel.

In USS' experience the larger the store is the more likely it is that the store will include more comparison floorspace at the expense of convenience floorspace. Thus it does not necessarily follow that providing a larger store in any location will meet more of the main food shopping needs of each urban expansion area and the nearby parts of NW Cambridge, unless restrictions are placed on any store to ensure an appropriate level of convenience floorspace is provided in each case.

USS supports Option B which provides for supermarket development only.

It follows therefore that USS does not support Options C or D which both include superstore options which are more likely to include comparison shopping that will compete directly with the city centre and will not meet the overall objectives set out in adopted and emerging policy for NW Cambridge which seeks to provide for facilities being provided which meet the needs of the new and existing population in the local area.

Notwithstanding these comments it is essential that whichever options are taken further forward the IPPG should include restrictions on the amount of comparison floorspace proposed to protect the city centre.
Drivers Jonas Deloitte.

from large comparison retail development outside the city centre which would normally be contrary to the provisions of PPS4. These restrictions should also be included in any future decision notices for any foodstore development to ensure the emphasis is on the sale of convenience goods, and that comparison goods floorspace should not increase over and above the stated ratios in the IPPG document. USS would suggest the following wording for such condition:

**Superstore:**

"Upon completion of the foodstore hereby approved, no more than 30% of the net floorspace of the store shall be used for the display or sale of comparison shopping including items such as clothing, footwear, household and recreational goods ".

**Supermarket:**

"Upon completion of the foodstore hereby approved, no more than 25% of the net floorspace of the store shall be used for the display or sale of comparison shopping including items such as clothing, footwear, household and recreational goods ".

These proposed conditions are in accordance with Circular 11/95 as being reasonable.

**Phasing of foodstore development**

USS believes that the scale of the foodstore should be relevant to need at this location in line with the background evidence. Paragraph 4.57 of the IPPG states that the Retail Study (February 2010) has focused an appropriate form and scale of foodstore provision in 2021 once all development in the North West area is completed.

USS advise that the development of the supermarket or superstore should be linked with the phasing of the housing development in the North West Cambridge to ensure that it is providing additional retail to serve the local catchment. This is to ensure that there would be no impact on the City Centre and the Grand Arcade shopping centre.

The IPPG should therefore make it clear that the foodstore provision should be linked to the completion of the housing elements of each development area.

In addition, USS advise that any decision notice for any future foodstore should include a condition to ensure that development is phased in line with Appendix A (Staging Development – paragraph 42) of Circular 11/95. USS suggest the following wording for such condition:

"The work comprised for the development of the foodstore hereby permitted shall not be commenced before the residential development comprised within x development area is completed".
We look forward to receiving confirmation that these representations have been received by the Council. If you would like to discuss any element of these proposals, please contact Claire Morison (0207 303 3447) at this office.

Yours sincerely

Giulia Bunting
for Deloitte LLP (trading as Drivers Jonas Deloitte)

cc. Neil Hardiman
    Jonathan Brookes

USS
JLL