

## BEEHIVE CENTRE AND CAMBRIDGE RETAIL PARK (CRP)

### REG 18 LOCAL PLAN REPRESENTATIONS

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Bidwells is providing representation to the Regulation 18 (January 2026) Local Plan on behalf of our client, Railpen. This document outlines the policies within the plan where Railpen object, support, comment or request proposed amendments, along with the rationale for each suggested amendment.

Each policy is addressed individually, with an explanation of the rationale for any proposed amendment and, where applicable, suggested revised wording. Where policies are lengthy, it is made clear which specific elements are being commented upon.

#### **Policy S/AMC: Areas of Major Change**

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to Areas of Major Change. The wording as currently drafted is provided below:

##### **Part 2**

*“2. Additionally, development will only be permitted:*

- a. where it is in accordance with a comprehensive implementation plan for the area which has demonstrable support from all key landowners, or it is supported by evidence to demonstrate that the comprehensive and successful delivery of the development can still take place without this being secured;*
- b. where the development is based on clearly articulated and justified objectives and approach through the provision of a site-wide masterplan, strategies and/or other over-arching coordination documents;*
- c. in instances where the infrastructure provision is to be phased, an approved phasing strategy is in place.”*

##### **Response to part a and b (Comprehensive implementation plan and landowner support)**

Railpen supports the principle of coordinated development and recognises the importance of comprehensive planning in appropriate circumstances. However, the additional criteria set out in points (a)–(c) impose unnecessary and disproportionate requirements that risk undermining the deliverability, flexibility, and effectiveness of development-on-development sites. The policy does not acknowledge that different sites are at different stages; some yet to come forward through planning and some are already very advanced. For example, the Beehive Centre has a recent planning permission with extensive coordinating documents within it. There is no need or benefit to now suggest a new requirement on the Beehive Centre to provide documents to directly address parts a of the policy.

##### **Response to part c (mandatory phasing strategy)**

The blanket requirement for a site-wide masterplan and associated coordination documents is not proportionate in all circumstances. The policy fails to distinguish between large, complex, multi-landowner regeneration areas and sites where incremental or phased development is entirely appropriate. This approach risks over-prescription, reducing flexibility and responsiveness to market conditions and evolving delivery opportunities.

The requirement for an approved phasing strategy wherever infrastructure provision is phased is unnecessarily restrictive. Requiring approval of a phasing strategy at an early stage may constrain otherwise viable schemes and

introduce avoidable delay. The policy should instead focus on ensuring that infrastructure is delivered in a timely and coordinated manner, rather than mandating a specific mechanism.

Railpen proposes the following amended wording to replace the existing text in the draft Local Plan:

*“Additionally, development will only be permitted:*

- a. where it ~~is in accordance with a comprehensive implementation plan for the area which has demonstrable support from all key landowners or it is supported by evidence to demonstrate that the comprehensive and successful delivery of the development can still take place without this being secured~~; will not prejudice the comprehensive and coordinated development of the wider area, having regard to key local strategies and frameworks*
- b. where the development is based on clearly articulated and justified objectives and ~~an appropriate level of coordination approach through the provision of a site-wide masterplan, which may include~~ strategies and/or other over-arching coordination documents;*
- c. in instances where the infrastructure provision is to be phased, ~~an approved phasing strategy is in place. the~~ development demonstrates that necessary infrastructure will be delivered in a timely and appropriate manner”*

This alternative approach retains the Council's objective of coordinated development while ensuring that the policy remains flexible, proportionate, and deliverable. It avoids placing unreasonable obligations on individual landowners and better reflects the realities of development delivery in Cambridge and so better support the timely and effective delivery of the Areas of Major Change.

## Policy S/AMC/BC: Beehive Centre

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to Policy S/AMC/BC: Beehive Centre.

Railpen suggests amendments to the wording of Policy S/AMC/BC part 1 (a and c). The wording as currently drafted is provided below:

*“1. Development proposals across this policy area, will be supported if they:*

*a. create a positive, balanced and attractive environment, to support the vitality and viability of this area;*

*c. support the delivery of public realm improvements, adopting an integrated approach towards public realm and streetscape design, linked to adjacent development proposals;”*

### Response to part a:

The intention and practical application of this criterion is unclear. The terms “vitality and viability” (part a) are well-established planning concepts, most commonly used in the assessment of town centre and retail uses. As currently drafted, the criterion risks creating uncertainty and ambiguity for decision-makers and applicants, particularly given the scale and mixed-use nature of the proposed redevelopment. While ‘vitality and viability’ have a strong foundation in retail policy, the policy (and the extant planning permission for the site) is to reduce/remove the amount of retail floorspace. Policies should be sufficiently precise to provide clarity and certainty, particularly where they are intended to guide large-scale, long-term redevelopment.

### Response to part c:

Additionally, the requirement to link public realm and streetscape design to “adjacent development proposals” (part c) introduces a level of dependency on third-party land, perhaps separate ownerships, and future proposals over which an individual applicant may have no control. As currently drafted, the policy risks undermining deliverability by implying that development proposals could be required to coordinate with, or be contingent upon, adjacent sites coming forward in a particular form or timeframe. It also risks delaying otherwise acceptable development where adjacent proposals are uncertain, evolving, or not progressing. Policies must be effective, deliverable and flexible.

To improve clarity and ensure the policy better reflects the site’s strategic role and planned evolution, Railpen proposes the following amended wording to replace the existing text in the draft Local Plan:

*“Development proposals across this policy area, will be supported if they*

*a. create a positive, balanced and attractive environment, to support the ~~vitality and viability of this area~~ successful regeneration of the site and its integration with the surrounding area*

*c. support the delivery of public realm improvements, adopting an integrated approach towards public realm and streetscape design ~~linked to adjacent development proposals~~; which responds positively to the surrounding context and, where reasonably practicable, has regard to adjacent development proposals.”*

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## Part 2.

2. Railpen suggests amendments to the wording of Policy S/AMC/BC part 2 (a and b). The wording as currently drafted is provided below:

*Any proposals to reconfigure the retail park to provide alternative uses must include:*

- a. *“an overarching development and environmental strategy framework to guide the site’s re-configuration over the short, medium and long-term;*
- b. *a material improvement in the quality of the site’s environment and public realm to support the overall vitality and viability of the area. This should include providing external plant equipment to support outdoor cultural activities”*

**Response to part a:**

As drafted, the requirement for an “overarching development and environmental strategy framework” lacks clarity and precision. The term is undefined within the Local Plan and does not correspond to any commonly recognised planning document, which creates uncertainty for applicants and decision-makers as to its scope, content, level of detail, and status within the decision-making process. This ambiguity risks placing an open-ended and potentially onerous burden on development proposals, contrary to the requirement for planning policies to be clear, justified and effective.

**Response to part b:**

The terms “vitality and viability” are well-established planning concepts, most commonly used in the assessment of town centre and retail uses. As currently drafted, the criterion risks creating uncertainty and ambiguity for decision-makers and applicants, particularly given the scale and mixed-use nature of the proposed redevelopment. While ‘vitality and viability’ have a strong foundation in retail policy, the policy (and the extant planning permission for the site) is to reduce/remove the amount of retail floorspace. Policies should be sufficiently precise to provide clarity and certainty, particularly where they are intended to guide large-scale, long-term redevelopment.

To improve clarity and ensure the policy better reflects the site’s strategic role and planned evolution, Railpen proposes the following amended wording to replace the existing text in the draft Local Plan:

- a. *“~~an overarching development and environmental strategy framework~~ clear set of development and environmental objectives to guide the site’s re-configuration over the short, medium and long-term;*
- b. *a material improvement in the quality of the site’s environment and public realm to support the overall **vitality and viability regeneration** of the area. This should include providing ~~external plant~~ equipment to support outdoor cultural activities”*

**Part 3**

3. Railpen requests amendments to the wording of Policy S/AMC/BC parts 3 (a and b). The wording as currently drafted is provided below:

*Where feasible, proposals should:*

- a. *create better east-west and north-south connections, improving the area’s links with the surrounding neighbourhoods;*
- c. *provide a movement strategy integrating with any proposals the Greater Cambridge Partnership may have for the wider area.*

The reference to east–west connections fails to acknowledge the presence of the railway line along the site’s eastern boundary. In addition, the future role of the Greater Cambridge Partnership is uncertain, and references to it should therefore be removed.

Railpen proposes the following amended wording to replace the existing text in the draft Local Plan:

*“Where feasible, proposals should:*

- a. ~~create better east-west and north-south connections, improving the area's links~~ Take opportunities to improve the connectivity with the surrounding neighbourhoods;
- c. ~~where feasible and proportionate, having regard to timing and certainty of local infrastructure projects~~ provide a movement strategy integrating with any proposals ~~the Greater Cambridge Partnership may have for in~~ the wider area.”

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## Supporting text

Railpen suggests amendments to the wording of Policy S/AMC/BC para 3.1.131, not least to acknowledge the important fact that the site received consent from the Secretary of State for the comprehensive redevelopment of the site. This is a material matter for the context of the policy and must be recognised that the consent defines that development and what is required from it.

**Para 3.1.131** *The former Beehive Centre area provides an important edge-of-centre brownfield site for intensification for a range of uses that complement the adjacent residential and retail park uses. This reconfiguration and intensification of uses affords the site many opportunities to improve its accessibility within the site and beyond, including access to Cambridge Retail Park which should be maximised to encourage the use of sustainable forms of transport to access the area and help reduce vehicular congestion. The area's long-term strategy is also expected to improve the area's environment and appeal for residents, local workers and visitors from further afield.*

The policy does not adequately reflect the Secretary of State's December 2025 decision granting planning permission for a comprehensive redevelopment of the site, which included a commercial R&D scheme, a new local centre, significant public realm improvements, a new public park, and enhanced connectivity. The applicant suggests the addition of the following wording:

**Para 3.1.131** *The former Beehive Centre area provides an important edge-of-centre brownfield site for intensification for a range of uses that complement the adjacent residential and retail park uses. This reconfiguration and intensification of uses affords the site many opportunities to improve its accessibility within the site and beyond, including access to Cambridge Retail Park which should be maximised to encourage the use of sustainable forms of transport to access the area and help reduce vehicular congestion. The area's long-term strategy is also expected to improve the area's environment and appeal for residents, local workers and visitors from further afield.*

*In December 2025, the Secretary of State granted planning permission for a comprehensive redevelopment of the site, comprising a commercial R&D-led scheme including a new local centre, significant public realm, a new public park and enhanced connectivity. That consented scheme is supported by approved phasing plans and a coordinated, site-wide approach to future development, which together meet the policy expectations for a Comprehensive Implementation Plan and an overarching development and environmental strategy framework.*

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## Supporting Information

### Para 3.1.132

Railpen suggests amendments to the wording of Policy S/AMC/BC para 3.1.132. The wording of this is shown below:

*“All short-to-medium proposals should have regard for the site's long-term ambition. Relevant public realm, landscape, movement and servicing strategies should consider how these have regard for these progressive stages and remain consistent with the area's agreed overarching development and environmental strategy framework, to ensure a cohesive approach to the site's comprehensive redevelopment.”*

The reference to an “overarching development and environmental strategy framework” is unclear, as the policy does not define what it is, when it is required, or the purpose it is intended to serve, creating uncertainty for applicants and decision-makers. Railpen suggested the amended wording below:

*“All short-to-medium proposals should have regard for the site’s long-term ambition. Relevant public realm, landscape, movement and servicing strategies should consider how these have regard for these progressive stages and remain consistent with the area’s ~~agreed clear set of development and environmental requirements-overarching development and environmental strategy framework~~, to ensure a cohesive approach to the site’s comprehensive redevelopment.”*

## **Policy J/RC: Retail and other complementary town centre uses**

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to Policy J/RC: Retail and other complementary town centre uses.

Railpen objects to the inclusion of Policy J/RC part 5. The wording as currently drafted is provided below:

*Across Greater Cambridge’s network of centres (excluding the Primary Shopping Area), proposals that would result in the loss of any retail or other main town centre use or in the reconfiguration of separate planning units through the merging of two or more units or sub-division of a unit will only be supported where:*

- a. there is no market demand for the existing unit(s) or potential replacement unit(s) of the same size and use, as demonstrated through an up-to-date marketing exercise for at least 12 months in accordance with the guidance provided in Appendix G: Marketing, local needs assessments and viability appraisals of this Local Plan demonstrating that the premises are not reasonably capable of being used or redeveloped for a town centre use acceptable in the centre; or*
- b. evidence is submitted that demonstrates the new use or reconfiguration of planning units (through merger or sub-division) would:*
  - i. meet an identified need for alternative community, retail or leisure facilities;*
  - ii. contribute positively to the vitality, viability and diversity of the centre; and*
  - iii. not result in significant adverse impacts on surrounding uses*

the additional criteria set out in policy J/RC impose unnecessary and disproportionate requirements that risk undermining the deliverability, flexibility, and effectiveness of development on the site. Policies should allow for greater flexibility and not impose unnecessary constrain, which may lead to empty units.

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## **Greater Cambridge’s Hierarchy of Designated Centres**

On behalf of our client, Railpen, we request that the former Beehive Centre site is excluded from the list of designated Retail Centres in the Local Plan. Designating the site as a Retail Centre creates a direct policy conflict with the Council’s ambition to achieve a comprehensive, major redevelopment of the site, which includes a commercial R&D-led scheme, a new local centre, enhanced public realm, and improved connectivity. Railpen suggests amendments to the wording of para 8.92 related to Policy J/RC

The supporting text makes reference to certain restrictions that the Council might put in place to reduce the permitted development rights of a scheme in main town centres. Railpen objects to the policy, on the grounds that greater flexibility should be offered to avoid the potential for empty shop locations, enhance deliverability and align with the goals on flexibility within the NPPF.

## Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge.

### Part 1.

1. Railpen suggests amendments to the wording of part 1(c) of policy S/PRIA worded below:

*c. help sustain or deliver local shops and services.*

The reference to local shops is not sufficiently clear or defined in planning policy. Each PRIA is different and it is not evident that all PRIAs should 'help sustain or deliver local shops and services' therefore it is requested that this is amended as shown below:

*c. help sustain or deliver ~~local shops and services~~ facilities and amenities appropriate to function and character of the area*

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### Part 3:

3. Railpen suggests amendments to the wording of part 3 and para 3.1.156 of policy S/PRIA worded below:

3 "Where proposals provide opportunities and potential challenges, site promoters should develop a policy framework, approved by the planning authority to promote and guide overall change during the life of the plan for the relevant area."

*Para 3.1.156 "it is recognised that while development can improve an area's attractiveness it can also challenge the area's character, in such circumstances site promoters are encouraged to develop a policy framework to guide the area's reconfiguration. Site specific policies requirements are also included, to highlight key local characteristics along with short and long-term opportunities and area aspirations that development should take account of as part of any planning application."*

We recommend that the wording be amended to refer instead to "steering document(s)". This would achieve the same objective of guiding and coordinating change over the life of the plan, while providing a more practical, flexible and deliverable mechanism aligned with the comprehensive approach already established; such as at Cambridge Retail Park (CRP) and its already formed Framework Document. The content and full intentions of a policy framework is not clear, but infers an unnecessary degree of additional policy layered over the Local Plan.

Railpen's suggested amended wording is provided below:

3. "where proposals provide opportunities and potential challenges, site promoters should develop a ~~policy framework steering document~~, approved by the planning authority ~~as part of a planning application~~ to promote and guide overall change during the life of the plan for the relevant area"

*Para 3.1.156 "it is recognised that while development can improve an area's attractiveness it can also challenge the area's character, in such circumstances site promoters are encouraged to develop a ~~policy framework steering document~~ to guide the area's reconfiguration. Site specific policies requirements are also included, to highlight key local characteristics along with short and long-term opportunities and area aspirations that development should take account of as part of any planning application."*

## S/PRIA/CRP: Cambridge Retail Park (CRP)

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to S/PRIA/CRP: Public Realm Improvement Areas (PRIA).

**Part 1:**

Railpen suggests amendments to the wording of part 1(b) of policy S/PRIA/CRP worded below:

*b. integrate positively with both the adjacent Beehive Centre development (Policy Ref. S/AMC/BC:) and the surrounding neighbourhoods;*

Reference to sufficient integration between CRP and Beehive is not sufficiently clear or measurable as a policy objective. Amended wording is provided below:

*b. **integrate Respond** positively with both the adjacent Beehive Centre development (Policy Ref. S/AMC/BC:) and the surrounding neighbourhoods;*

**Part 2:**

2. Railpen suggests amendments to the wording of part 2 (a and c) of policy S/PRIA/CRP worded below:

2a) "Where proposals provide opportunities and potential challenges, site promoters should develop a policy framework, approved by the planning authority to promote and guide overall change during the life of the plan for the relevant area."

2c) "~~a better urban relationship with Newmarket Road, the Beehive Centre development and the surrounding neighbourhoods.~~

We request that the wording be amended to refer instead to "steering document(s)". This would achieve the same objective of guiding and coordinating change over the life of the plan, while providing a more practical, flexible and deliverable mechanism aligned with the comprehensive approach already established at Cambridge Retail Park (CRP) through is already formed Framework Document.

Railpen recommends that part c of the wording is amended to overcome the uncertainty for what an 'urban relationship' is and rather provide a clearer policy direction that any future application that comes forward will respond positively to the adjacent area.

Railpen suggests the amended wording, which is provided below:

2a) "Where proposals provide opportunities and potential challenges, site promoters should develop a **policy framework, steering document** approved by the planning authority to promote and guide overall change during the life of the plan for the relevant area."

2c) "~~a better urban relationship with Newmarket Road, the Beehive Centre development and the surrounding neighbourhoods~~ An improved design approach that responds positively to the adjacent areas"

**Part 3:**

3. Railpen suggests amendments to the wording of part 3 (a and c) of policy S/PRIA/CRP worded below:

*"Where feasible, proposals should:*

*a. create better east-west and north-south connections, improving the area's links with the surrounding neighbourhoods;*

*c. provide a movement strategy integrating with any proposals the Greater Cambridge Partnership may have for the wider area."*

The reference to east-west connections fails to acknowledge the presence of the railway line along the site's eastern boundary. In addition, the future role of the Greater Cambridge Partnership is uncertain, and references to it should therefore be removed.

~~“a. create better east-west and north-south connections, improving the area’s links Take opportunities to improve the connectivity with the surrounding neighbourhoods;~~

~~c. where feasible and proportionate, having regard to timing and certainty of local infrastructure projects provide a movement strategy integrating with any proposals the Greater Cambridge Partnership may have for in the wider area.”~~

#### Part 4:

4. Railpen suggests amendments to the wording of part 4 of policy S/PRIA/CRP worded below.

An urban design led approach should be taken to inform the appropriate scale and massing of development proposals in the policy area. Studies will also be required to show ~~that land use proposals will be in accordance with the approved steering document justify proposed land uses floorspaces and their redevelopment~~ on a proposal-by-proposal basis.

#### Supporting Information

3.1.159 Railpen **requests amendments** to the wording of para 3.1.159 of policy S/PRIA/CRP worded below:

*It is, however recognised that the site is subject to many constraints related to the current leaseholders on site that may limit these opportunities, in the short-to-medium term. However, all short-to-medium proposals should have regard for the site’s long-term ambition. Relevant public realm, landscape, movement and servicing strategies should consider how these have regard for these progressive stages and remain consistent with the area’s agreed overarching development and environmental strategy framework, to ensure a cohesive approach to the park’s evolution, ensuring it remains ‘open for business’ throughout.*

The requirement for an “overarching development and environmental strategy framework” lacks clarity and precision. The term is undefined within the Local Plan and does not correspond to any commonly recognised planning document, which creates uncertainty for applicants and decision-makers as to its scope, content, level of detail, and status within the decision-making process. This ambiguity risks placing an open-ended and potentially onerous burden on development proposals, contrary to the requirement for planning policies to be clear, justified and effective. This must be replaced with a reference to a ‘steering document’ which would better relate to the already formed ‘Cambridge Retail Park Framework Document’.

Alternative wording is suggested below:

*It is, however recognised that the site is subject to many constraints related to the current leaseholders on site that may limit these opportunities, in the short to medium term. However, all short to the medium proposals should have regard for the site’s long term ambition. Relevant public realm, landscape, movement and servicing strategies should consider how these have regard for these progressive stages and remain consistent with the area’s agreed ~~overarching development and environmental strategy framework steering document~~, to ensure a cohesive approach to the park’s evolution, ensuring it remains ‘open for business’ throughout.*

#### J/RC: Retail and other Complementary Town Centre Uses

On behalf of our client Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to J/RC: Retail and other Complementary Town Centre Uses.

#### Part 5:

The opening paragraph says:

*Across Greater Cambridge’s network of centres (excluding the Primary Shopping Area), proposals that would result in the loss of any retail or other main town centre use or in the reconfiguration of separate planning units through the merging of two or more units or sub-division of a unit will only be supported where:*

This is an overreach of policy in the context of Class E and the government giving a clear direction that there should be free movement between many uses without requiring planning consent. This same attitude should be applied to reconfiguration of planning units to ensure there can be a responsive retail environment to best support the vitality and viability of town centre uses. A policy position for a 12 month marketing period will bring delay and would lead to greater periods of vacancy which will act against the vitality and viability of retail areas.

Railpen requests that part 5 is deleted.

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### **Hierarchy of Designated Centres**

This includes Beehive Centre as a 'District and Town Centre'; however, the Beehive Centre is to be an Area of Major Change, with its own policy to promote that change (S/AMC/BC) and has received in December 2025 planning consent for the complete redevelopment of the site which will remove much of the retail floorspace. It is peculiar and inappropriate to have two policies that so clearly act against each other: S/AMC/BC promoting change and J/RC inferring some protected status to its retail function.

Railpen requests that the Beehive Centre is removed from the named list of Hierarchy of Designated Centres.

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### **S/PRIA/ED: Eastern Gate**

Railpen supports the policy and its reference in Part 1 to the Beehive Centre and Cambridge Retail Park and how the Eastern Gate area and adjoining or nearby sites can collectively deliver a greater beneficial impact to the local area.

Railpen requests an amendment to **Part 1 f** of policy S/PRIA/ED as currently worded below:

*f. integrate positively with the adjacent Cambridge Retail Park (Policy Ref. S/PRIA/CRP), Beehive Centre (Policy Ref. S/AMC/BC), Fitzroy/Burleigh Street/Grafton Area (Policy Ref. S/AMC/FBG) and surrounding neighbourhoods.*

References to 'integration' is not sufficiently clear or measurable as a policy objective. Amended wording is provided below for precision and clarity:

*f. ~~integrate~~ respond positively ~~with to~~ the adjacent Cambridge Retail Park (Policy Ref. S/PRIA/CRP), Beehive Centre (Policy Ref. S/AMC/BC), Fitzroy/Burleigh Street/Grafton Area (Policy Ref. S/AMC/FBG) and surrounding neighbourhoods.*