BIDWELLS

POLICY S/AMC: AREAS OF MAJOR CHANGE

Policy S/AMC: Cambridge 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 3:

"*3. Additionally, development will only be supported:*

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 to deliver schemes at 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. Phasing can change over time and may not be precisely know at such an early stage in the development process. Phasing is important but requiring approval of a phasing strategy at an early stage may constrain otherwise viable schemes and introduce avoidable delay. The policy should instead require at least an indicative phasing strategy to show how a site is capable of timely phasing, but not suggest a binding strategy is required to early in the process.

Summary of why Railpen consider the plan is not legally compliant or is unsound

The policy is considered unsound because it is overly prescriptive, insufficiently justified and may undermine effective delivery. It imposes blanket requirements for implementation plans, site-wide masterplans and phasing strategies without recognising differing site circumstances or stages of delivery. This could duplicate work already undertaken for advanced or consented sites, such as the Beehive Centre, while unnecessarily constraining incremental development. The requirements may reduce flexibility, delay delivery and restrict the ability of schemes to respond to changing

market conditions. A more proportionate approach should focus on securing coordinated development and timely infrastructure delivery, with requirements tailored to individual site circumstances.

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

"3. Additionally, development will only be supported:

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 it is possible to 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.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary

Railpen wishes to participate in the relevant hearing session(s) because its representations raise a number of concerns regarding the soundness, effectiveness and deliverability of policies across the Plan. These concerns relate to matters including policy justification, proportionality, flexibility, implementation and the practical implications of applying the proposed policy framework to development sites at different stages of the planning and delivery process.

Participation in the hearings would allow Railpen to explain these concerns in greater detail, respond to the Council's evidence and clarify how particular policy requirements may operate in practice. It would also provide an opportunity to discuss potential modifications that could improve the clarity, effectiveness and deliverability of the Plan while still achieving its overarching objectives.

Given the breadth of Railpen's representations and its direct interest in the implementation of the Plan, participation would assist the Inspector by providing a landowner and development perspective on the practical consequences of the proposed policies. Railpen therefore considers that its involvement in the relevant hearing sessions would make a useful contribution to the examination of whether the Plan has been positively prepared, is justified, effective and consistent with national policy.