BIDWELLS

S/AMC/BC: BEEHIVE CENTRE

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy parts 1a, 2a, 2b, 3a and supporting paragraphs 3.1.131 and 3.1.132 wording relating to Policy S/AMC/BC: Beehive Centre.

Railpen suggests amendments to the wording of Policy S/AMC/BC part 1 (a). 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 successful regeneration of the site and its integration with the surrounding area to support the vitality and viability of this area;

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.

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 successful regeneration of the site and its integration with the surrounding area ~~to support the vitality and viability of this area~~;

Response to Part 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. *"A clear set of development and environmental objectives and overarching development and environmental strategy framework to guide the site's re configuration over the short, medium and long-term; and*
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. *"A clear set of development and environmental objectives and overarching development and environmental strategy ~~framework~~ to guide the site's re configuration over the short, medium and long-term; and*
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"*

Response to part 3:

Railpen requests amendments to the wording of Policy S/AMC/BC part 3 (a). 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;

The reference to east–west connections fail 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;

Response to Para *3.1.131*

Railpen suggests amendments to the wording of Policy S/AMC/BC para 3.1.136, 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 3.1.96 *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 after 3.1.96:

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.

Response to Para 3.1.98

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~~ development and environmental requirements ~~overarching~~ ~~development and environmental strategy framework~~ , to ensure a cohesive approach to the site's comprehensive redevelopment."

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

Railpen considers the policy unsound because several requirements are unclear, imprecise and insufficiently justified, creating uncertainty for applicants and decision-makers. References to "vitality and viability" are inappropriate in the context of a site transitioning away from predominantly retail uses, while the undefined "overarching development and environmental strategy framework" risks imposing an open-ended and disproportionate burden. The policy also fails to reflect physical constraints on connectivity and does not adequately acknowledge the Secretary of State's December 2025 permission for comprehensive redevelopment of the Beehive Centre. Amendments are therefore required to ensure the policy is clear, effective, proportionate and properly reflects the site's established planning context.

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 and to site-specific policies related to large sites in Railpen's ownership. 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.