BIDWELLS

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.

Response to part 5:

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

Across Greater Cambridge's network of centres (including Cambridge City Centre but 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.

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.

Response to part 8c

Railpen suggests amendments to the wording of Policy J/RC part 8(c). The existing wording of policy 8(c) is shown below:

8. Proposals for retail and other main town centre uses outside designated centres will only be permitted where:

c. for retail and leisure proposals where the development exceeds 500 square metres of gross internal floorspace, the proposal is accompanied by a Town Centre Impact Assessment to demonstrate that there would be no significant adverse impacts on existing, committed and planned investment or on the vitality and viability of centres that may be affected.

500sqm is just a fifth of the national default of 2,500sqm (Policy TC4(1) NPPF 2026) for Impact Assessments, representing a significant departure from national policy. A threshold set this low will also draw a wide range of modest, everyday proposals, such as single convenience stores, restaurant or gym units, for example, creating an onerous and expensive requirement for small retailers. As currently drafted, criterion 8(c) is exposed to challenge at Examination as unjustified and disproportionate. We recommend the Council either reinstate the national default threshold or bring forward robust, finalised evidence to support a lower figure
Railpen suggests that the wording of condition 8(c) is altered to the policy wording below:

8. Proposals for retail and other main town centre uses outside designated centres will only be permitted where:

c. for retail and leisure proposals where the development exceeds ~~500~~ 2,500 square metres of gross internal floorspace, the proposal is accompanied by a Town Centre Impact Assessment, proportionate to the scale and nature of the proposal to demonstrate that there would be no significant adverse impacts on existing, committed and planned investment or on the vitality and viability of centres that may be affected.

Para 8.91

Railpen objects to the wording of para 8.91 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. We suggest that paragraph 8.91 is removed.

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

Railpen considers Policy J/RC unsound because its application to the Beehive Centre would impose unnecessary and disproportionate restrictions on the loss or reconfiguration of retail uses. The marketing and evidential requirements could reduce flexibility, delay redevelopment and risk retaining vacant or unsuitable units. More fundamentally, continued designation of the Beehive Centre as a Retail Centre conflicts with the strategic objective for its comprehensive redevelopment as a mixed-use, R&D-led scheme with a new local centre, improved public realm and enhanced connectivity. The policy should therefore be amended to remove the Beehive Centre from the designated Retail Centre network and better reflect its planned future role.

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.