BIDWELLS

J/RC: RETAIL AND OTHER COMPLEMENTARY TOWN CENTRE USES

On behalf of our client, Railpen, we submit an objection to part 5 (a and b) of emerging policy J/RC Retail and other Complementary Town Centre Uses.

Greater Cambridge emerging Local Plan Policy J/RC Part 5

Part 5: 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; 632

ii. contribute positively to the vitality, viability and diversity of the centre; and iii. not result in significant adverse impacts on surrounding uses.

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

Railpen requests that part 5 is removed to support the vitality and viability of retail centres and not have a policy position to act to have units vacant for some 12 months merely to fulfil a marketing period.

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.

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

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 use. 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.

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.