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.

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

Part 3 of Policy S/PRIA is worded as follows:

Part 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.*

Paragraph 3.1.121 of Policy S/PRIA is worded as follows:

Para 3.1.121 *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*

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

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. It should also be made clearer when the suggested document would come forward, we request (if it is a policy requirement that is kept) that it is as part of a planning application.

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

Part 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 3.1.121 *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*

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 (especially to site specific allocations), 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.