# POLICY S/PRIA/CRP: CAMBRIDGE RETAIL PARK (CRP)

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy wording relating to S/PRIA/CRP: Cambridge Retail Park (CRP).

Railpen Supports the amended wording of Policy S/PRIA/CRP part 1 (a).

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Railpen suggests amendments to the wording of part 2 (a and c) of policy S/PRIA/CRP worded below:

*"Proposals to reconfigure the retail park to provide additional floorspace will include:*

*a. An overarching development and environmental strategy framework to guide the site's re-configuration over the short, medium and long-term;*

*c. A better urban relationship with Newmarket Road, the Beehive Centre development and the surrounding neighbourhoods."*

We request that the reference to a "framework" 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 at Cambridge Retail Park (CRP) through is already formed Framework Document.

Railpen recommends that part c of the wording is amended to overcome the uncertainty for what an 'urban relationship' is and rather provide a clearer policy direction that any future application that comes forward will respond positively to the adjacent area.

Railpen suggests the amended wording, which is provided below:

*"Proposals to reconfigure the retail park to provide additional floorspace will include:*

*a. An overarching development and ~~environmental strategy framework~~ steering document to guide the site's re-configuration over the short, medium and long-term;*

*c. ~~A better urban relationship with Newmarket Road, the Beehive Centre development and the surrounding neighbourhoods.~~ An improved design approach that responds positively to the adjacent areas"*

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Railpen suggests amendments to the wording of part 3(b and d) of policy S/PRIA/CRP worded below:

*"where feasible proposals should:*

*b. Improve connectivity with surrounding neighbourhoods including creating 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. The text should therefore be updated to read:

*b. Improve connectivity with surrounding neighbourhoods including creating better ~~east-west and north-south~~ connections, improving the area's links with the surrounding neighbourhoods"*

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Railpen suggests amendments to the wording of part 4 of policy S/PRIA/CRP worded below:

*Part 4: An urban design led approach should be taken to inform the appropriate scale and massing of development proposals in the policy area. Studies will also be required to justify proposed land uses floorspaces and their redevelopment on a proposal-by proposal basis.*

Railpen suggests amendments to the wording of part 4 of policy S/PRIA/CRP, to incorporate a reference to a steering document. The suggested wording of part 4 is provided below:

Part 4: An urban design led approach should be taken to inform the appropriate scale and massing of development proposals in the policy area. Studies will also be required to show that land use proposals will be in accordance with the approved steering document ~~justify proposed land uses floorspaces and their redevelopment~~ on a proposal-by-proposal basis.

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**Supporting Information**

Railpen requests amendments to the wording of para 3.1.125 of policy S/PRIA/CRP.

We recommend that the wording be amended to refer to a "steering document". 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.

The amended wording of para 3.1.125 is provided below:

para 3.1.125: *It is, however recognised that the site is subject to many constraints related to the current leaseholders on site that may limit these opportunities, in the short-to-medium term. However, 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~~ steering document, to ensure a cohesive approach to the park's evolution, ensuring it remains 'open for business' throughout.*

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

Railpen's concern is that Policy S/PRIA/CRP, as drafted, will not be effective or justified. Requiring an "overarching development and environmental strategy framework" is seen as an impractical, inflexible mechanism unlikely to be deliverable, whereas a "steering document" would achieve the same coordinating purpose more flexibly. The requirement for a "better urban relationship" with surrounding areas is too vague to give applicants or decision-makers clear direction, undermining certainty. And the policy's reference to "east-west" connections is flawed, ignoring the railway line forming the site's eastern boundary. meaning these parts of the policy are not based on robust, proportionate evidence.

**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.