BIDWELLS

POLICY BG/EO (PROVIDING AND ENHANCING OPEN SPACES)

Railpen principally supports the objective of providing and enhancing open space. However, it objects to the policy as drafted as it fails to adequately recognise the specific characteristics of commercial development within Greater Cambridge, particularly development located within established science parks and employment campuses.

Criterion 4 requires all commercial developments exceeding 2,000 sqm GIA to provide open space equivalent to 2.0 hectares per 1,000 employees. This requirement is overly prescriptive and risks undermining the efficient use of employment land. The 2,000 sqm threshold is low, and the blanket requirement for 20 sqm of open space per employee is unlikely to be appropriate across all development types and locations. In particular, schemes in more constrained urban locations may struggle to meet the requirement without comprising the efficient use of land and achieving development viability. NPPF policy L1(1)(a)(iii) expects plans to actively identify through design-led, context-sensitive approaches rather than a blanket formula applied without regard to site context.

The policy also fails to adequately recognise existing open space provision or consider whether additional open space is necessary in all circumstances. Some employment schemes have been masterplanned to incorporate significant areas of green infrastructure and open space from the outset. Requiring each individual development to provide further open space does not reflect the campus-wide approach to open space provision and management already in place.

Furthermore, the policy does not sufficiently recognise the range of open space solutions that may be appropriate in commercial environments including roof terraces, roof gardens, courtyards and other forms of amenity space that can contribute to employee wellbeing and reduce any impact to nearby public open spaces arising from new commercial floorspace without unduly compromising the efficient use of development land.

The policy also provides limited clarity on how the requirement would apply to phased developments or future phases within larger employment campuses. This creates uncertainty for applicants and makes site planning, masterplanning and viability assessments more challenging.

The cumulative effect of these requirements risks placing an unnecessary burden on commercial development, contrary to the objective of supporting sustainable economic growth across Greater Cambridge.

Please provide your comments below (100 words max) (give details of why you consider the plan is not legally compliant or is unsound.)

Railpen supports the objective of providing and enhancing open space but considers the policy overly prescriptive for commercial development. Requiring schemes above 2,000 sqm GIA to provide 2 hectares of open space per 1,000 employees may constrain efficient land use and viability, particularly in urban locations. The policy insufficiently acknowledges existing provision, or alternative forms of amenity space including roof terraces, gardens and courtyards. It also lacks clarity for phased developments. Overall, the requirements risk placing unnecessary burdens on employment growth across Greater Cambridge.

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

Railpen recommends the removal of part 4 of the policy.

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.