POLICY GP/ST (SKYLINE AND TALL BUILDINGS)

Policy GP/ST is overly restrictive and should be amended to provide greater flexibility and ensure that decisions are based on a balanced assessment of planning considerations.

The policy adopts a cautious approach to tall buildings and places significant limitation on opportunities to optimise development capacity in a sustainable way. This is of particular concern for commercial development, where building upwards can be an effective way of accommodating growth, supporting intensification and making efficient use of constrained sites. The policy should more clearly recognise that, in appropriate locations, taller buildings can make a positive contribution to sustainable development and economic growth.

Criterion e states that “applications must demonstrate that there is no adverse impact on neighbouring buildings and open space…”. By its nature, development can give rise to some level of impact, and the planning system requires these impacts to be weighed against the benefits of a proposal. The current wording establishes an unreasonable "no adverse impact" test, rather than applying the balanced approach expected through the planning process.

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

Railpen considers Policy GP/ST overly restrictive and seeks greater flexibility to ensure decisions reflect a balanced assessment of planning considerations. The policy takes an unduly cautious approach to tall buildings, potentially limiting opportunities to intensify commercial development, optimise constrained sites and support sustainable economic growth. In suitable locations, taller buildings can make efficient use of land and deliver positive planning benefits. Criterion e is also problematic because requiring “no adverse impact” on neighbouring buildings and open space sets an unrealistic test. Development will often create some impacts, which should instead be weighed proportionately against the wider benefits of the proposal and should rather be assessed against “*no unacceptable impact*”.

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

Part 1:

Development proposals that break or result in a significant change to the existing skyline, or are significantly taller than the surrounding built form (as defined by the local context heights in Appendix I: Skyline and Tall Buildings Guidance), must demonstrate how they will maintain or enhance the distinctive skyline and character of Cambridge and the surrounding district. Such proposals will be supported where they demonstrate a positive response to their wider setting, and satisfy the following criteria having regard to the following considerations, and where any identified harm, individually or cumulatively, is not judged in the overall planning balance, to outweigh the public benefits of the proposal including the contribution it makes to meeting identified housing and employment needs and to the efficient use of land:

Supporting information 7.37 insertion:

The scope and detail of assessment required under criteria (a)–(e) should be proportionate to the extent to which a proposal exceeds the relevant local context height and tall building threshold.

Para 7.34

Given the large number of designated heritage assets within the historic core of Cambridge, including a significant number of highly graded heritage assets of great national importance, the potential impact that a proposal for a tall building may have on the significance of those assets will be a critical factor in the consideration of the proposal. ~~For~~

~~this reason, it is very unlikely that there would be many instances or scope for introducing new tall buildings in or around the historic core.~~ Proposals in or around the historic core will be subject to a correspondingly high standard of justification and scrutiny under criterion 1(b), assessed on their individual merits. The impact on the setting of heritage assets should be assessed in accordance with the guidance set out in The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) and Tall Buildings: Historic England Advice Note 4 or any successor documents.

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.