



Draft Greater Cambridge Local Plan (Regulation 18) Consultation

Representations

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Prepared for:
Royal London Mutual Insurance Society Ltd

Prepared by:
Stantec

Project Number:
333102875

Registered Office: Stantec House, Kelburn Court,
Birchwood, Warrington, WA3 6UT

Office Address: 50/60 Station Road, Cambridge CB1 2JH
T: 01223 882 000 E: cambridge.uk@stantec.com

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Prepared by:

 Signature
 LP

 Printed Name

Reviewed by:

 Signature
 RM

 Printed Name

Approved by:

 Signature
 RM

 Printed Name



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1 Introduction

1.1 Preamble

- 1.1.1 This report ('the Representations') has been prepared by Stantec on behalf of the Royal London Mutual Insurance Society Ltd ('the Representor') and sets out the Representor's responses to the Draft Greater Cambridge Local Plan (GCLP) (Regulation 18) Consultation.

1.2 The Representor

- 1.2.1 The Royal London Mutual Insurance Society Ltd is the UK's largest mutual life, pensions and investment company, offering protection, long term savings and asset management products and services, and focusses on delivering positive change on behalf of its members and customers. Our client owns Cambridge Research Park, Landbeach and Vision Park, Histon which are key employment destinations and contribute to the regions life sciences and technology clusters in Greater Cambridge.
- 1.2.2 The report sets out information on Cambridge Research Park, Landbeach and Vision Park, Histon and comments on the relevant draft policies of the GCLP (Regulation 18) Consultation. These comments have also been submitted online via the Council's consultation portal.
- 1.2.3 The remainder of this report sets out the Representors comments on specific draft policies in the Plan.



2 Background

2.1 Cambridge Research Park, Landbeach

- 2.1.1 Cambridge Research Park (CRP) is a long-established and successful employment location situated approximately 10 km north of Cambridge city centre, with direct frontage to the A10 and convenient access to both Waterbeach and Cambridge North railway stations. The Park accommodates a strong and diverse commercial base across sectors including biotechnology, technology, medical technology, and professional services, and provides high-quality employment opportunities for the wider sub-region.
- 2.1.2 The Site sits immediately opposite the emerging Waterbeach New Town, a major strategic growth area that will deliver a new settlement of more than 25,000 residents. As Waterbeach develops, the role of CRP as a key employment destination will be further reinforced through improved transport connections and an expanding range of local services and amenities. The proximity of the two sites creates significant potential for a complementary and mutually supportive relationship between new homes and established employment land.
- 2.1.3 CRP also benefits from a well-defined planning history, shaped by four outline planning permissions. The original permissions (1989 and 1994) established the framework for the Park's early phases of development, while a subsequent consent in 2012 enabled further expansion. The most recent outline planning permission (S/4615/18/OL) remains extant with several reserved matters approvals already implemented across the Park.
- 2.1.4 The most recent reserved matters application was submitted for Plot 5000 (application ref. 21/05624/REM) comprising a Reserved Matters application (Access from Beech Road, Appearance, landscaping, Layout and Scale) for the erection of 8,400m² of mixed offices, research and development, light industrial, general industrial, storage and distribution, pursuant to outline planning consent S/4615/18/OL which was approved on 28 June 2022.
- 2.1.5 A Section 73 application has recently been approved on 19 September 2025 for Plot 5000 comprising:

S73 to vary condition 2 (Approved plans) and the discharge of conditions 3 (Hard and soft Landscape scheme), 5 (Tree Pits) and 7 (External surface Materials) of reserved matters application 21/05624/REM (Reserved Matters application (Access from Beech Road, Appearance, Landscaping, Layout and Scale) for the erection of 8,400m² of mixed offices, research and development, light industrial, general industrial, storage and distribution, pursuant to outline planning consent S/4615/18/OL) Additional fire exit doors added to units 10 & 11 on loading door elevation, Landscape design amended to widen and enhance the pedestrian access off Beech Drive between units 10 & 11 and its connection to a new proposed landscaped amenity feature at the centre of the site between units 10 & 13 to strengthen the green link and Elevations of each building enhanced with timber boarding feature.

2.2 Vision Park, Histon

- 2.2.1 Enterprise House and Discovery House (EH&DH) are located within Vision Park, which is an established business park in the village of Histon, to the north of Cambridge. Vision Park is located off Station Road and comprises six buildings in addition to EH&DH, which are used for offices, laboratories and research.
- 2.2.2 The development of Vision Park dates back to the 1980s and relates to various outline and detailed planning permissions, including the most relevant, which are application references S/0642/89/F and S/2057/86/F, granting permission for the erection of buildings for use as office/research and development/manufacturing/storage. We understand these permissions to have been implemented.



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- 2.2.3 More recently, an application for full planning permission was submitted by Royal London in 2025 and validated by South Cambridgeshire District Council on 29 September 2025 (ref. 25/03783/FUL). That application is for the demolition and redevelopment of two existing office buildings for a new lab/office building and associated landscaping.



3 Policy S/JH: New jobs and homes

3.1 Response to Policy S/JH

- 3.1.1 The latest evidence on need in Greater Cambridge undertaken by Icenl in 2025, identified an objectively assessed need for 73,200 jobs over the plan period 2024–2045. We acknowledge that a minimum of this scale of growth is needed to support the knowledge-intensive sectors, including life sciences and technology, while also supporting a diverse range of employment opportunities. However, we suggest that this figure will likely need to evolve to align with the Government’s broader growth agenda whilst ensuring the vision can be achieved sustainably.
- 3.1.2 Cambridge Research Park, Landbeach and Vision Park, Histon are sustainably located, established and strategically important employment destinations that already make a significant contribution to Greater Cambridge’s science and technology clusters. These locations are well placed from a public transport and access to homes perspective, to accommodate further growth through intensification and redevelopment, helping to deliver additional jobs in accessible locations in Greater Cambridge.



4 Policy J/AW: Affordable workspace and creative industries

4.1 Response to Policy J/AW

- 4.1.1 It is understood the Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of and payments in-lieu calculations.
- 4.1.2 It is considered that a requirement for a prescriptive percentage provision of affordable workspace over a fixed period, or in perpetuity, will challenge the deliverability and viability of some commercial development. This will not enable development to respond to market signals in an effective way and the application of this policy, when developments reach a certain amount of new (net) employment is an inflexible approach. This would contradict part 1 of the policy which requires affordable workspace to meet a local identified need, therefore, this policy is considered to be unsound.
- 4.1.3 We would challenge the draft policy's requirements that affordable workspace should be delivered before or at the same time as 50% of the non-affordable workspace. Based on our understanding of the science and technology occupier market, start-up business prefer to co-locate close to established, more mature, businesses so that they can fully take advantage of the clustering benefits which can in turn drive innovation. Part 4, as drafted, therefore may not properly reflect market signals and again may hinder quick delivery of floorspace within the early parts of the plan period.



5 Policy J/EP: Supporting a range of facilities in employment parks

5.1 Response to Policy J/EP

- 5.1.1 We support Policy J/EP, as it appropriately enables a range of flexible facilities within employment parks, including indoor and outdoor leisure, eating, social and collaboration spaces where this is appropriate and viable. These facilities help to create a stronger sense of place, support employee wellbeing and seek to reduce the need for workers to travel off-site during the working day which may involve reliance on private car trips for lunchtime and incidental needs. The policy strikes an appropriate balance by ensuring such uses remain ancillary or complementary to existing or proposed employment uses.
- 5.1.2 We also support the requirement for new or expanded employment sites and business parks to consider and demonstrate how the needs of workers and visitors will be met in a coordinated way which enables flexibility. The policy is considered to be consistent with national policy, particularly paragraph 85 of the NPPF (2024), which seeks to create the conditions in which businesses can invest and expand.
- 5.1.3 Overall, it is considered this policy is positively prepared, justified and effective as set out in paragraph 36 of the NPPF 2024.



6 Policy J/NE: New employment development proposals

6.1 Response to Policy J/NE:

- 6.1.1 We support Cambridge Research Park's (CRP) continued designation as an Established Employment Area in the countryside under Policy J/NE Section 5b. of the Draft Greater Cambridge Local Plan (Regulation 18) which supports employment development in principle, although we highlight CRP should be viewed as being within an urban location given it is adjacent to the new town of Waterbeach. We also support the policy approach of Policy J/NE, section 4 which sets out that within Established Employment Areas in the countryside proposals for employment development will be permitted where they are of a scale and character that reflects their location which seeks to support job creation in Greater Cambridge.
- 6.1.2 We welcome the distinction made within the "Expansion of existing businesses in the countryside" section 6, which explicitly excludes Established Employment Areas (EEA). This appropriately recognises EEA's strategic importance and ensures that additional and overly restrictive requirements are not applied to these key employment locations.
- 6.1.3 Within the current South Cambridgeshire Local Plan 2018 the Plan sets out the Council will consider the case for removing restrictive planning conditions and planning obligations imposed under previous development plans which have served their purpose of supporting the embryonic high tech R&D sector and are not consistent with the current approach to local economic development.
- 6.1.4 However, this is not expressed in the current Draft Greater Cambridge Local Plan (Regulation 18) and should be incorporated into policy J/NE to enable flexibility which is particularly important for established high-tech and R&D sites that have matured since those restrictions were imposed. This will support business investment and expansion, in line with paragraph 85 of the NPPF 2024, which places significant weight on supporting economic growth and productivity and creating the conditions for businesses to invest and expand.

7 Policy S/WNT: Land North of Waterbeach

7.1 Response to Policy S/WNT

- 7.1.1 Part 15b of policy S/WNT requires Waterbeach New Town to provide direct, segregated high quality pedestrian and cycle links to nearby existing facilities such as Cambridge Research Park.
- 7.1.2 We support part 15b of policy S/WNT as it promotes sustainable travel and enables effective integration between Waterbeach New Town and the adjacent Cambridge Research Park which is an Established Employment Area. High-quality walking and cycling connections will reduce reliance on private car trips and support access to jobs, services and facilities across Waterbeach New Town and to and from Cambridge Research Park. It should be recognised that occupiers of CRP will still need to travel using the private vehicle in light of the timescales for the new sustainable travel based infrastructure.
- 7.1.3 This approach is consistent with paragraph 109 of the NPPF 2024, which requires transport issues to be considered from the earliest stages of plan-making and development, using a vision-led approach to promote walking, cycling and public transport and to create well-designed, sustainable places.
- 7.1.4 Policy S/WNT and part 15b of policy S/WNT is therefore considered to be justified and effective as set out in paragraph 36 of the NPPF 2024.



8 Policy S/RRA/CH: Land at Compass House, Chivers Way, Histon and Impington

8.1 Response to Policy S/RRA/CH

- 8.1.1 We support this policy which seeks to allocate land at Compass House for office E(g) (i), research and development E(g) (ii) and associated ancillary uses as this will help to create the conditions in which businesses can invest, expand and adapt as set out in paragraph 85 of the NPPF 2024. These uses are also needed to support a modern economy as set out in paragraph 86c of the NPPF 2024 although, we highlight this site does not exist in isolation and is spatially linked to Vision Park and the Histon & Impington Station Area.
- 8.1.2 The NPPF 2024 promotes comprehensive and coordinated development and it is considered the policy wording should be amended to include ensuring the development aligns through collaboration with the Mixed Use Development in Histon & Impington Station Area (Area of Major Change) (policy S/AMC/HIS) and with Vision Park (owned by our client). This will help to deliver coherent masterplanning, high-quality design outcomes and long-term deliverability with a comprehensive approach to placemaking across Vision Park, Compass House, and Histon & Impington Station Area holistically. It is considered this amendment to the policy is required to ensure it is effective as set out in paragraph 36 of the NPPF 2024.



9 Policy S/AMC/HIS: Mixed Use Development in Histon and Impington Station Area

9.1 Response to Policy S/AMC/HIS

- 9.1.1 We support this policy because it marks the area around the former Histon & Impington Railway Station and Guided Busway as an Area of Major Change through mixed use redevelopment and this will help to create the conditions in which businesses can invest, expand and adapt as set out in paragraph 85 of the NPPF 2024. These uses are needed to support a modern economy as set out in paragraph 86c of the NPPF 2024 although, we highlight this site does not exist in isolation and is spatially linked to Compass House and Vision Park.
- 9.1.2 The NPPF 2024 promotes comprehensive and coordinated development and it is considered the policy wording should be amended to include ensuring the development aligns, in collaboration with Land at Compass House, Chivers Way (policy S/RRA/CH) and with Vision Park (owned by our client). This will help to deliver coherent masterplanning, high-quality design outcomes and long-term deliverability with a comprehensive approach to placemaking across Vision Park, Compass House and Histon & Impington Station Area holistically. It is considered this amendment to the policy is required to ensure it is effective as set out in paragraph 36 of the NPPF 2024.



10 Summary

- 10.1.1 This report ('the Representations') has been prepared by Stantec on behalf of Royal London Mutual Insurance Society Ltd ('the Representer') and sets out the Representer's responses to the draft Greater Cambridge Local Plan (GCLP) Regulation 18 consultation. These comments have also been submitted online via the Council's consultation portal.
- 10.1.2 Our client owns Cambridge Research Park, Landbeach and Vision Park, Histon which are key employment destinations and contribute to the regions life sciences and technology clusters in Greater Cambridge as well as the national economy.
- 10.1.3 Cambridge Research Park (CRP) is a long-established and successful employment location situated approximately 10 km north of Cambridge city centre, with direct frontage to the A10 and convenient access to both Waterbeach and Cambridge North railway stations. Enterprise House and Discovery House (EH&DH) are located within Vision Park, which is an established business park in the village of Histon, to the north of Cambridge. Vision Park is located off Station Road and comprises six buildings in addition to EH&DH, which are used for offices, laboratories and research.
- 10.1.4 The Representer has submitted comments on the draft GCLP Regulation 18 policies in light of the National Planning Policy Framework (NPPF) 2024. The comments seek to ensure the draft GCLP Regulation 18 plan is 'sound' as set out in paragraph 36 of the NPPF 2024 which requires it to be a) positively prepared, b) justified, c) effective and d) consistent with national policy.

