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Greater Cambridge Local Plan
Regulation 18 Consultation
By Email Only

Dear Sir/ Madam

REPRESENTATIONS TO THE GREATER CAMBRIDGE LOCAL PLAN (REG 19) ON BEHALF OF PIONEER GROUP

Bidwells LLP is instructed by Pioneer Group Ltd ['Pioneer'] to submit representations to the Draft Greater Cambridge Local Plan (Regulation 18) Consultation ['the draft Plan'].

Pioneer Group

Pioneer Group is Europe's leading vertically integrated platform curating innovation focused ecosystems that increase the chance of business success, providing venture funding, strategic guidance, and state-of-the art real estate.

Established in 2003, Pioneer's business is designed to nurture and accelerate the growth of companies focused on tackling the greatest challenges for human and planetary health.

Pioneer currently manages a portfolio of more than 4m sq.ft in key locations, including London, Manchester, Cardiff, Edinburgh, and Dublin. Through this portfolio it curates a community of entrepreneurs, investors, experts, academics, industries and associations.

The Councils will be aware that Pioneer is embarking upon the comprehensive redevelopment the Grafton Centre as the city's first urban Life Science Centre and incubator. Supporting this, the project will invest significantly in the city's public realm.

Ambition

We support the Councils' recognition throughout the draft Plan's preamble and supporting text that the region makes a substantial contribution to national economic health. However, we suggest that the growth of the Cambridgeshire economy should be specifically mentioned within the Council's 'Vision for Greater Cambridge'. We would encourage the Council to be bold, and to recognise that the region's continued growth – fuelled by both housing and jobs – is critical to delivering the environment in which future generations can flourish.

Complexity

At the outset of these representations, we wish to express concern with respect to the document's length and complexity. The NPPF (2024) states that Plans should be "succinct" (NPPF, 15). At over 830 pages (excluding appendices) the draft Plan is anything but, and many of the policies interact with one another in a way which is not necessary. The draft Plan is of such a length that it hampers the ability of the lay



25 Old Burlington Street, London W1S 3AN
T: [REDACTED] E: info@bidwells.co.uk W: bidwells.co.uk

person to engage with the document. Whilst we are conscious of the geographic extent of the document and the hard work of officers in preparing it, we would urge the Councils to simplify the emerging policies at the next stage.

With respect to specific policies, we wish to make the following representations.

Policy S/JH: New jobs and homes.

Objection: The proposed policy wording presents a requirement to deliver 73,300 jobs over the period 2024-2045 as an objectively assessed need. In our opinion, this figure must be specifically treated as a minimum benchmark rather than a maximum or constraining target.

Supporting evidence to the policy titled the 'Greater Cambridge Employment and Housing Needs Update 2024-2045 (September 2025)¹, concludes at 3.55 that the various scenarios modelled indicate a potential to deliver between 67,600 and 90,900 additional jobs over the plan period. This compares to between 66,600 and 75,800 additional jobs modelled under the previous 2023 evidence. This significant increase in the upper end of the modelling indicates that economic growth expectations have strengthened exponentially, not diminished.

As set out in the Employment and Housing Needs Update, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The evidence identifies a 'Central growth' scenario of 73,200 jobs across the plan period, representing sustained annual growth of around 3,500 jobs and integrating assumptions of slower periods, contractions, and economic shocks, and is therefore inherently conservative rather than reflective of the full growth capacity of the Cambridge economy.

Cambridge's success is not limited to the scientific arena. Life science research and application has seen a technological transformation over recent years. The majority (83%) of the life sciences community is now using some level of automation across their R&D processes (Bidwells & YouGov, 2023). This has innovated the drug development process and clinical trials, but is extending well beyond these areas. Cloud-connected medical devices, artificial intelligence, machine learning, and gene sequencing and editing are evolving rapidly and will deliver new products and transform processes. This will present challenges to companies across the sector to keep pace with the evolution underway. Restricting employment growth to historical trends fails to embrace the advancement technology brings. To do so in one of the most innovative clusters in the world fails to meet the Government's key priority of growing the economy.

The Employment and Housing Needs Update acknowledges a 'High' and 'High Sensitivity' scenario, whereby growth would meet or exceed the 2010–2020 trajectory. For the reasons outlined, the high level of growth is feasible in Cambridge and would support the Government's direction of travel. It is therefore important to recognise that higher-growth outcomes remain credible and should not be ruled out by policy.

Whilst we recognise the pressures on housing and infrastructure arising from the regional ambition, it is for these reasons, that we consider the Local Plan should utilise a more optimistic outlook regarding job numbers and include explicit support for higher-growth scenarios. At the very least, to avoid the risk of Policy S/JH being found unsound, the jobs target should be explicitly set out as a minimum reflecting that of housing need.

¹ This is referred to in the draft GCLP as the Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU 2025).

Policy S/PA/CC: Cambridge City Centre

Support: Whilst we consider the policy to unnecessarily duplicate wider policy, the overall approach to encouraging development within the City Centre, and specifically at Fitzroy/Burleigh Street/Grafton Area, is supported.

Policy S/AMC: Areas of Major Change

Object: Areas of Major Change should be considered as areas of opportunity in which development is actively supported and encouraged. However, as demonstrated by the wording: “*Excluding very minor development, development proposals within AMCs will only be permitted in the following circumstances...*” it is considered the policy seeks to negatively control development contrary to the presumption in favour. This will unnecessarily restrict the opportunity of the very change the AMC’s are designed to facilitate. It also conflicts with existing and emerging national planning policy.

In addition, the policy seeks to establish controls which are not necessary and which increase the burden of planning policy upon development viability. This fundamentally conflicts with aspiration to see growth in these areas, and must be avoided. Wider requirements of the AMC policy are picked up elsewhere within the emerging Plan and should therefore be deleted.

The following revisions are therefore put forward:

1. High quality ~~D~~development within the designated Areas of Major Change (AMC), as shown on the Policies Map, is supported in principle. ~~should be of the highest quality design and incorporate the principles of sustainable design and construction. Excluding very minor development,~~

~~2. development proposals within AMCs will only be permitted in the following circumstances:~~

~~a. when the necessary infrastructure and associated arrangements to support that development have been secured, either by delivery as part of the development or through other stakeholders including relevant local authorities;~~

~~b. where acceptable alternative infrastructure provision, including temporary provision where appropriate, has been secured;~~

~~c. where an assessment shows that a particular development can take place in advance of such provision without causing unacceptable impacts.~~

~~2. Additionally, development will only be permitted:~~

~~a. where it is in accordance with a comprehensive implementation plan for the area which has demonstrable support from all key landowners, or it is supported by evidence to demonstrate that the comprehensive and successful delivery of the development can still take place without this being secured;~~

~~b. where the development is based on clearly articulated and justified objectives and approach through the provision of a site-wide masterplan, strategies and/or other over-arching coordination documents;~~

~~c. in instances where the infrastructure provision is to be phased, an approved phasing strategy is in place.~~

~~3.2. In terms of density, activity and movement, development should:~~

~~a. be of higher densities in the city centre, and around key transport interchanges, district centres and local centres, subject to local circumstance;~~

~~b. create active and vibrant places that encourage social interaction and foster a sense of community by improving both accessibility and inclusivity. This should include providing external plant equipment and, or utility connections to support temporary outdoor community and cultural activities.~~

~~4. In protecting existing assets, including open space, heritage assets, landscape and water management, development should:~~

~~a. seek to protect and enhance public rights of way, where possible and existing public assets, in accordance with the applicable Local Plan policy requirement;~~

~~b. develop a new, strong landscape framework that is guided by and incorporates existing positive landscape and townscape features and heritage assets;~~

~~c. where practicable, undertake on-site strategic landscaping to the agreed framework early in the development of the site so that this will become established as development proceeds.~~

S/AMC/DBG: Fitzroy/Burleigh Street/Grafton Area

Object. Further to representations at earlier stages of the draft Plan's development, the Council will be aware that Pioneer represent significant landowners within the proposed DBG AMC. It is again considered that the policy is constructed in a negative manner. Rather than establishing a baseline that development within the AMC is acceptable, it establishes a shopping list of requirements, many of which conflict with the requirements of existing and emerging national policy.

In addition, the policy fails to recognise a) the flexibility afforded by reforms to the Use Classes Order, and b) that an existing planning permission has been granted for the comprehensive redevelopment of the Grafton Centre, and the process of implementing that permission is now underway.

Revisions are therefore proposed as follows:

~~1. Development proposals across this policy area, will be supported. if they:~~

~~a. create a positive, balanced and attractive environment, to support the vitality and viability of the area for retail, leisure, cultural and other associated town centre activities;~~

~~b. integrate positively with both the historic environment and the surrounding neighbourhoods;~~

~~c. support the delivery of public realm improvements, adopting an integrated approach towards public realm and streetscape design, linked to adjacent development proposals; and~~

~~d. support the provision for a shared surface along Fitzroy Street and Burleigh Street, adopting an integrated approach for both cyclists and pedestrians designed to ensure safety for all surface users and improved management of servicing, subject to further discussion with the Transport Authority.~~

~~2. Reflecting the identification of the AMC as a potential location suitable for tall buildings, aAn urban design led approach should be taken to inform the appropriate scale and massing of~~

development proposals in the policy area. ~~Proposals should also be accompanied by evidence to justify land uses, floorspaces and their redevelopment on a proposal-by-proposal basis.~~

Grafton Shopping Centre

3. Comprehensive and or, more intensive redevelopment in the former Grafton Shopping Centre for a range of **Commercial, Business and Service, and complementary city-centre** uses will be supported, including uses associated with ARU's East Road campus.

4. Proposals to extend and reconfigure the former shopping centre building to provide additional floorspace should include:

a. site intensification, providing a significant uplift in floorspace for a range of uses which complement both the city centre, the surrounding area and the skyline of the city;

~~b. an overarching street-based development strategy framework to guide the site's re-configuration over the short, medium and long term;~~

~~c. a material improvement in the quality of the city centre environment and public realm to support the overall vitality and viability of the area; and~~

~~c. d. a better urban relationship with the surrounding neighbourhoods and high street interfaces.~~

5. Where feasible, proposals should **establish a clear hierarchy of routes for pedestrians, cyclists and private motor vehicles including an integrated approach to the management of servicing in the short and long term; and:**

a. re-integrate the area with adjacent streets and establish a more sensitive response to the townscape beyond the policy area's boundary;

b. create better east-west and north-south connections, improving the area's links with the surrounding neighbourhoods;

c. create a more permeable and legible network for pedestrians and cyclists.

~~Proposals should establish a clear hierarchy of routes for pedestrians, cyclists and private motor vehicles including an integrated approach to the management of servicing in the short and long term; and~~

~~d. Provide a movement strategy integrating with any proposals the Greater Cambridge Partnership may have for the city.~~

Selective and Infill Development Opportunities

~~6. Infill development opportunities include selective reconfiguration of service yard spaces around the edge of the former Grafton Shopping Centre. Proposals should:~~

~~a. to the north, enhance service areas with a focus on public realm and wayfinding improvements to improve linkages from Newmarket Road; and~~

~~b. to the south, create a more active and positive edge along Burleigh Place service area~~

Fitzroy Street

7. Grafton West Car Park is an appropriate location for more significant redevelopment of *various use*, subject to car parking evidence supporting its redevelopment, further townscape analysis and feasibility analysis. The more intensive redevelopment of the car park, *where feasible*, should:

- a. establish a more efficient use of the site;
- b. re-establishing the broad historic structure of lanes with Fitzroy Street into the wider fabric of the neighbourhood.

8. Subject to further townscape analysis, there is also an opportunity to consider the buildings to the north of Fitzroy Street to achieve a more comprehensive approach, focusing on the listed building at 17 Fitzroy Street. ~~Key interventions should also include:~~

- ~~a. enhanced connections through to Maids Causeway / Newmarket Road;~~
- ~~b. mews style homes fronting onto Salmon Lane, at a scale that responds positively to the townscape;~~
- ~~c. new dwellings set around courtyard gardens, fronting a new pedestrian route to Fair Street;~~
- ~~d. potential redevelopment along parts of Fitzroy Street; and~~
- ~~e. targeted improvements to shop fronts on the southern side of Fitzroy Street.~~

Burleigh Street

9. Opportunities to improve the retail and leisure offer on both sides of Burleigh Street, including the retention of smaller, flexible retail units will be supported including selective shopfront improvements or sensitive infill / redevelopment along the southern side beyond No. 74 Burleigh Street. Proposals should take account of the area's features as follows:

- a. distinctive buildings to maintain the area's more positive examples of existing townscape character and independent retailing;
- b. on the north side of Burleigh Street, the retention of more sensitive buildings including shopfront enhancements, refurbishment of historic shopfronts, and potential selective redevelopment of buildings; and
- c. on the south side of Burleigh Street, shopfront improvements with opportunities for refurbishment and potential infill development;

10. On East Road, The Snug and adjacent properties form a key group of finer grain buildings and should be retained as part of any future redevelopment proposals.

Policy CC/NZ: Net zero carbon new buildings

Comment. Whilst worthy, the objectives of draft Policy CC/NZ are likely, upon adoption of emerging national policy, to become out of date as policies should not set quantitative standards nor duplicate matters addressed by Building Control. We therefore suggest that the policy should be deleted.

Policy BG/BG: Biodiversity and geodiversity

Comment. Government makes clear within the emerging national policy that development plans should only set BNG targets in excess of statutory requirements within site specific allocations.

Policy BG/TC: Improving tree canopy cover and the tree population

Object. Both adopted and emerging versions of the NPPF make clear that planning policies should promote the effective use of land in meeting the need for homes and other uses, particularly in sustainable locations. This is further strengthened through the direction of travel set out in emerging Policy L2 of the reformed NPPF.

An overarching requirement for major development to demonstrate a minimum of 30% tree canopy cover risks introducing an inflexible and prescriptive constraint that could undermine development capacity, density and viability. As such, it is not aligned with national planning policy or with the Government's stated ambition for growth.

Policy WS/NC: Meeting the needs of new and growing Communities

Comment. National planning policy requires that development plans, not planning applications identify shortfalls in the availability of community facilities and infrastructure. Reforms to the NPPF include a proposed requirement for developments which significantly increase local populations to provide for community facilities and improvements to public service infrastructure – either by delivery or financial contribution. The Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency

Policy WS/CF: Community, sports and leisure facilities

Comment. We again consider there to be conflict with emerging national planning policy. National decision-making policy HC6 provides a simplified policy which should be applied.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

Support: We support the Councils in seeking to maximise local economic opportunities through major developments.

Policy GP/ST: Skyline and tall buildings

Object. Whilst we support the spirit of the draft policy it is considered that it should be revised to ensure that it does not unnecessarily conflict with wider aspirations for the optimisation of brownfield land impacting the ability to deliver on the aspiration for growth. We would propose the following amendments:

1. Tall Buildings are defined as those which are significantly taller than the surrounding built form.

21. Proposals for taller tall buildings will be supported where they are appropriate to their location and demonstrate a positive response to the wider setting. Developments that break or cause significant change to the existing skyline ~~and/or significantly taller than the surrounding built form~~ (as defined by the local context heights in Appendix H: Skyline and tall buildings guidance), will be assessed against the following criteria:

a. Location, setting and context – applicants must demonstrate through visual appraisals, with supporting accurate visual representations, how the proposals fit within ~~the existing~~, and

~~contribute towards existing and planned landscape and townscape and provide a clear assessment of how proposals maintain or enhance the skyline.~~

b. Impact on the historic environment – applicants must demonstrate and quantify the potential harm of proposals to the significance of heritage assets ~~and their settings. or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis. These~~ This will include impact on key landmarks and viewpoints (identified in Appendix H: Skyline and tall buildings guidance) ~~including from main streets, local vantage points (such as bridges) and open spaces as well as, dynamic views from roads and, where applicable, The River Cam corridor. For Cambridge, Within Cambridge city,~~ proposals must ensure that the character and appearance of a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints.

c. Scale and massing – applicants must demonstrate using scaled drawings, sections, accurate visual representations and models, how their proposals will deliver a high-quality addition to the skyline. This will include assessment of the cumulative impact ~~at both strategic and local levels with other existing or emerging proposals as well as against the baseline at the time the application is being made of~~ committed development.

d. Design quality – applicants must demonstrate how their proposals create well- proportioned buildings expressing elegance, proportionality and verticality that articulate base, middle and top using high quality materials and detailing that architecturally integrates plant, lift overruns and flues. Where appropriate, proposals should introduce a mix of uses that generate activity and a human scale at street level.

e. Amenity and microclimate – applicants must ~~demonstrate~~ carefully consider the ~~that there is no adverse~~ impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking or overshadowing, and ~~that there is~~ adequate sunlight and daylight within and around the proposals.

f. Public Safety – ~~demonstrate consideration of public safety requirements as part of the overall design. Suicide prevention— applicants must demonstrate how their proposal incorporates appropriate mechanisms to reduce access to means of suicide. Design will be determined by the structure of the buildings and its surroundings.~~

Policy GP/HA: Designated heritage assets

Object: As proposed, the draft policy does not allow for any harm to designated heritage assets and fails to recognise the balancing exercise required by both the National Planning Policy Framework (2024) and the Planning (Listed Buildings and Conservation Areas) Act 1990.

The statutory duties under Sections 66 and 72 of the 1990 Act require decision-makers to have special regard to the desirability of preserving the setting of listed buildings and special attention to preserving or enhancing the character or appearance of conservation areas. These duties do not impose an absolute prohibition on harm, but instead require any harm to be identified and weighed in the planning balance.

Similarly, the NPPF (2024) explicitly allows for harm to designated heritage assets where this is justified and outweighed by public benefits, through a structured assessment of significance, harm and justification. The proposed policy wording fails to reflect this approach and is therefore inconsistent with national policy and legislation.

The use of mandatory language in Part 2 of the policy overstates the statutory and policy tests and removes the necessary scope for professional judgement and balancing.

Policy GP/HA should therefore be amended to reflect the statutory wording and the NPPF approach, replacing mandatory language with more proportionate wording that allows impacts on heritage significance to be assessed in the round, taking account of scale, context and public benefits in accordance with legislation and national policy.

Policy GP/ND: Non-designated heritage assets

Object: Similarly, draft policy seeks to “ensure the retention and enhancement” of non-designated heritage assets. National policy does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits.

Draft Policy GP/ND should be amended to reflect the NPPF’s proportionate approach and allow impacts to be assessed through balanced decision-making.

Policy J/AW: Affordable workspace and creative industries

Object: The requirement for affordable workspace may significantly affect development viability for schemes that are already facing significant pressures. In the absence of detailed viability testing, and appropriate flexibility within the policy to account for unknown viability pressures, it is considered that the policy conflicts with requirements of the NPPF.

It is suggested that if the policy is carried forward, a viability clause should be added in. This could allow for negotiated contributions and provide justification for alternative delivery mechanisms as outlined in the draft policy.

Policy J/RC: Retail and other complementary town centre uses

Object: The proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support.

To achieve our understanding of the Councils’ aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of ‘Agent of Change’.

Policy J/SA: Cambridge City’s Primary Shopping Area

Object: Given that the Council now proposes to split policy in respect of the Primary Shopping Area from draft Policy J/RC, the objections in relation to J/RC follow into the wording proposed for J/SA.

Next Steps

Thank you for the opportunity to contribute to the emerging policies at this stage. We look forward to working with the Councils as the emerging Local Plan develops. Please do not hesitate to get in touch if it would help to discuss any of the comments raised in greater detail.

Yours faithfully,



Jonathan Bainbridge
Partner, Planning

For and on behalf of Bidwells LLP