Proposed Submission Greater Cambridge Local Plan (Regulation 19) Consultation

Representations

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Prepared for:
Royal London Mutual Insurance Society Ltd

Prepared by:
Stantec UK Ltd

Project Number:
333102875

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

Office Address:
3rd Floor, 50/60 Station Road, Cambridge. CB1 2JH
T: +44 1223 882 000 E: cambridge.uk@stantec.com

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Issued by	**Stantec UK Limited** 3rd Floor, 50/60 Station Road Cambridge CB1 2JH stantec.com	+44 1223 882 000 stantec.com
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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 Proposed Submission Greater Cambridge Local Plan (GCLP) (Regulation 19) Consultation. This response follows representations made on the Draft Greater Cambridge Local Plan (GCLP) (Regulation 18) Consultation submitted in January 2026.

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 19) 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), varied through planning permission 25/00089/S73 was granted on 31 December 2025 and remains extant with several reserved matters approvals already implemented across the Park.

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.

2.2.3 More recently, an application for full planning permission was granted by South Cambridgeshire District Council on 30 June 2026 (ref. 25/03783/FUL) for the demolition and redevelopment of two existing office buildings for a new lab/office building and associated landscaping with construction about to commence.

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 Iceni in 2025 and following Iceni's Review of economic data, context and representation on the Greater Cambridge Local Plan dated June 2026 continues to identify an objectively assessed need for 73,300 jobs over the plan period 2024–2045. As set out in our representations to the GCLP Reg 18 consultation 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 At the GCLP Reg 18 stage, the Councils were still refining the nature and scale of the employment floorspace the policy would 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 which has now been set out in the Proposed Submission GCLP Reg 19 consultation.

4.1.2 The proposed policy sets out that schemes for new office and R&D development (use classes E(g) i) and E(g) ii) over 1,000sqm will be required to provide a minimum of 10% of net additional floorspace GIA, as affordable workspace. Furthermore, within specified established science and business parks in Greater Cambridge (which includes Vision Park), the affordable workspace discount is proposed to be a minimum of 30% below prevailing market rents in perpetuity. The Greater Cambridge Affordable Workspace Study (June 2026) considers Cambridge Research Park as being within the South Cambridgeshire market where a minimum 20% discount below prevailing market rents in perpetuity would apply.

4.1.3 The policy also proposes for new Industrial and Storage (use class E(g) iii, B2 and B8) over 2,500sqm to provide a minimum of 10% of net additional floorspace as affordable workspace (GIA) at a min. of 20% below prevailing market rents in perpetuity.

4.1.4 It is considered that a requirement for a fixed percentage provision of affordable workspace in perpetuity is substantial and is likely to affect the deliverability and viability of some commercial development. Such a restrictive policy will not enable development to respond to market signals in an effective way and the application of this policy, when developments reach a certain quantum of new (net) employment is an inflexible approach which risks reducing the overall delivery of employment floorspace. This effect may be particularly disproportionate for schemes only marginally exceeding the 1,000sqm threshold. It would also contradict part 3a of the policy which requires affordable workspace to meet a local identified need, therefore, this policy is considered to be unsound.

4.1.5 We continue to challenge the draft policy's requirements that affordable workspace should be made available for occupation at the same time as, or prior to, the first occupation of 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.

4.1.6 Paragraph 85 of National Planning Policy Framework (NPPF) 2024 states planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The cumulative requirement of Policy J/AW has the potential to constrain investment and delivery of employment floorspace, particularly at Cambridge Research Park and Vision Park. Therefore, the policy is not considered to be justified, effective or consistent with national policy and does not satisfy the soundness requirements set out in paragraph 36 of the NPPF 2024.

5 Policy J/NE: New employment development proposals

5.1 Response to Policy J/NE:

5.1.1 We support Cambridge Research Park's (CRP) continued designation as an Established Employment Area in the countryside under Policy J/NE Section 6b. of the Proposed Submission GCLP (Regulation 19) which supports employment development in principle. We also support the policy approach of Policy J/NE, section 5 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.

5.1.2 We welcome the distinction made within the "Expansion of existing businesses in the countryside" section 7, 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.

5.1.3 Within the adopted 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.

5.1.4 However, this is not expressed in the current Proposed Submission GCLP (Regulation 19) 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, such as Cambridge Research Park. 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.

6 Summary

6.1.1 This report ('the Representations') has been prepared by Stantec on behalf of Royal London Mutual Insurance Society Ltd ('the Representor') and sets out the Representor's responses to the Proposed Submission Greater Cambridge Local Plan (GCLP) Regulation 19 consultation. These comments have also been submitted online via the Council's consultation portal.

6.1.2 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.

6.1.3 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.

6.1.4 The Representor has submitted comments on the Proposed Submission GCLP Regulation 19 policies in light of the NPPF 2024. The comments seek to ensure the Proposed Submission GCLP Regulation 19 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.