BIDWELLS

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Greater Cambridge Local Plan
Regulation 18 Consultation

Dear Greater Cambridge Shared Planning,

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

Bidwells LLP is instructed by Pioneer Group Ltd to submit representations to the Draft Greater Cambridge Local Plan (Regulation 19) Consultation.

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 Grafton Centre

The Councils will be aware that Pioneer is embarking upon the comprehensive redevelopment of 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.

As a key landholder in the city, Pioneer Group have submitted several comments to specific policies, which are included in **Appendix 1** for ease of reference. Some key points include:

- Although the Submitted GCLP will be examined against the NPPF 2024 under transitional arrangements, the NPPF 2026 will be the relevant material consideration in terms of national policy once adopted. In addition, all development plan polices which are materially inconsistent with the national decision-making polices (NDMPs) in the NPPF 2026 should be given very limited weight (Annex A, Paragraph 2). There is therefore a need for greater alignment with the ambitions of the new NPPF (2026).
- Although Pioneer Group are supportive of the objectives of the Local Plan, the cumulative list of requirements, in addition to potential CIL liabilities, would create significant viability issues and risk under delivery in the plan period.
- Support for Town Centre Uses in the Local Plan itself and national policy is such that flexibility of uses and densification should be more explicit supported in order to contribute to the vitality of town centres.

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Examination of the Local Plan

Bidwells, on behalf of a number of clients has submitted representations on the above and would be happy to attend the EiP to explain our rationale on this matter should the Inspectors be minded to invite Bidwells to assist in their considerations of the soundness of the plan.

Kind regards

Jonathan Bainbridge
Partner, Planning

Appendix 1: Policy representations to Greater Cambridge Local Plan Reg 19

APPENDIX 1: GRAFTON CENTRE REG 19 REPS SUBMITTED VIA WEB FORM

Policy S/C/AMC: Cambridge Areas of Major Change

Comments

Areas of Major Change should be considered as areas of opportunity in which development is actively supported and encouraged. Whilst the Regulation 19 draft addresses some of our comments at Regulation 18 stage, we remain of the opinion that the wording of the proposed policy is such that it seeks to negatively control development contrary to the presumption in favour. This is because the policy seeks to establish controls which are not necessary and which increase the burden of planning policy upon development viability. Further to the National Planning Policy Framework (August 2026) [NNPF26], 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 not be repeated within this policy.

For example, one such requirement is the need for a 'Cultural and Community Plan' at point 3d, which duplicates Policy WS/NC. Pioneer Group Ltd object to the replication of this policy as this is considered unsound. Furthermore, it is considered that the redevelopment of Areas of Major Change within Cambridge City represent at their core a significant cultural and community benefit and this should be recognised. Similarly, it may not be relevant in every instance to enhance public rights of way or undertake on-site strategic landscaping and these additions may render crucial redevelopment unviable.

The omission of reference to support for higher densities in Areas of Major Change risks limiting the ability of developers to bring genuine, meaningful transformation. Although the Submitted GCLP will be examined against the NPPF 2024, the NPPF 2026 will be the relevant material consideration in terms of national policy once adopted. In addition, all development plan polices which are materially inconsistent with the national decision-making polices (NDMPs) in the NPPF 2026 should be given very limited weight (Annex A, Paragraph 2). If adopted, the omission of support for higher densities would be materially inconsistent with Policy L3 of the NPPF26 which notes that within settlement boundaries, applications for development should involve an increase in density. Additionally Policy TC2 gives substantial weight to the benefits of intensification where it supports the overall vitality and viability of town centres. Accordingly, policy S/AMC should provide explicit support for densification.

An open mindset to densification is also beneficial as it may enable viability challenges to be overcome if present. The Draft Local Plan introduces a number of new policy requirements, including:

- Net Zero Operational Carbon (CC/NZ);
- Supporting a circular economy and sustainable resource use, including a greater emphasis on retaining existing buildings, which can be complex and costly to deliver, may reduce overall floorspace, and can affect market attractiveness (CC/CE);
- Biodiversity Net Gain of 20% (BG/BN);
- Accreditation under the Building with Nature Standards (BG/GI);
- Urban Greening Factor requirements (BG/UGF);
- Provision and enhancement of open space within commercial schemes (BG/EO); and
- Affordable Workspace requirements (J/AW).

Whilst these are positive and important aspects of successful development, they contribute to a higher cost base for development in Greater Cambridge than in many competing locations.In conclusion, the policy regarding Cambridge Areas of Major Change fails to adequately reflect the ambition for the densification of key sites and adds onerous controls such as Community and Cultural Plans which are

duplicated elsewhere in the plan. The cumulative impact of these requirements risks undermining the delivery of development, particularly during the first five to ten years of the Plan period. This is in addition to potential CIL liabilities should this be adopted. The cumulative impact of these requirements represent a potentially major viability hurdle which could be lessened with densification. Otherwise, the plan as it stands risks rendering many opportunities unviable, meaning the district is unlikely to meet its projected employment needs.

Changes required to the plan

~~1.~~ High quality d~~D~~evelopment within designated Areas of Major Change (AMC) within Cambridge, 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, development proposals within AMCs must be accompanied by the necessary supporting infrastructure, delivered as part of the development or through other stakeholders including relevant local public bodies/organisations. This may include temporary provision where appropriate.~~

~~2. Development may be delivered in advance of such provision, subject to assessment that demonstrates that the proposal will not cause unacceptable impacts.~~

~~3. Additionally, development will be supported:~~

~~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; In instances where the infrastructure provision is to be phased, an approved phasing strategy is in place; and~~

c. Developments should ~~Where they~~ enable active streets and vibrant places that encourage social interaction and foster a sense of community by improving both accessibility and inclusivity.

d. Opportunities for densification are supported in suitable locations and subject to local circumstances in order to achieve vibrant places. This should include providing external plant equipment and/or utility connections to support temporary outdoor community and cultural activities.

~~d. Where relevant, Community and Cultural Plans should be prepared to demonstrate a robust, evidence-led and locally responsive approach for their provision.~~

~~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;~~

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

~~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.~~

Policy S/AMC/FBG: Fitzroy / Burleigh Street / Grafton Area

Comments

With its funding partner Angelo Gordon TPG, Pioneer Group Ltd controls significant landholdings within the Fitzroy Street, Burleigh Street and Grafton Area of Major Change, including the Grafton Centre. Pioneer Group Ltd has previously made representations during the preparation of the Greater Cambridge Local Plan and remains supportive of the principle of regeneration, intensification and diversification within this highly sustainable city centre location.

However, Policy S/AMC/FBG is not considered sound in its current form for three key reasons as expanded on below. Firstly, the lack of flexibility afforded to this key city centre Site contradicts national policy support for city centre redevelopment and amendments to Class E of the Use Class Order. Secondly, the policy should provide greater support for intensification, and thirdly that there should be some recognition of the extant planning permission on the Site within the supporting text.

The policy should be worded so as to establish a baseline that development within the AMC is acceptable, whereas the detailed policy as proposed operates principally as a cumulative list of requirements, many of which conflict with the requirements of existing and emerging national policy which work to support the flexibility of town centre uses and provide a 'positive approach to their growth' (NPPF, 2024). The policy wording requires simplification to ensure that development proposals within the AMC are supported without being restricted by an overly onerous list of requirements.

Additionally, the supporting information notes that 'A central objective of the policy is also to support a flexible approach to uses which will enable a positive response to the shifting dynamics of consumer trends and business needs across short, medium and long-term cycles.' The policy wording however does not reflect the changes afforded by the amendments to the Use Class Order in 2020 and consequently is overly restrictive in the acceptable uses for the area. The 2020 Regulations created Class E and brought together a wide range of former retail, financial and professional service, restaurant, office, research and development, light industrial and other commercial and service uses, meaning that changes between these uses no longer require planning permission under most circumstances. Additionally, Policy TC2 (NPPF, 2026) provides support for 'provision of residential accommodation' in town centres, which should be included in Policy S/AMC/FBG so as to ensure consistency.

Against that legislative context, the policy's repeated distinction between retail, leisure, cultural, office and other commercial uses is unnecessarily rigid. The policy should recognise the role of Class E in enabling buildings and floorspace to respond to changing occupier requirements without repeated applications for planning permission in respect of use.

It is accepted that some uses, including hotels, housing and student accommodation, fall outside Class E and may require separate consideration. However, the policy should not seek to recreate distinctions between individual Class E uses unless clear and proportionate evidence demonstrates that such controls are necessary.

Furthermore, Part 2 requires proposals to be accompanied by evidence justifying "land uses, floorspaces and their redevelopment on a proposal-by-proposal basis". This is excessively broad and appears to require all proposals to justify uses that may already be permitted by the Use Classes Order, the development plan or an extant planning permission which conflicts with objectives set out in the supporting text and national policy relating to objectives for flexibility, resilience and adaptation.

As well as supporting flexibility, the policy should provide further support to intensification of the Site in line with the objectives of Areas of Major Change and Part 4 of the policy which describes that proposals at the Grafton Shopping Centre should include 'significant uplift in floorspace'. The omission of reference

to support for higher densities in Areas of Major Change risks limiting the ability of developers to bring genuine, meaningful transformation. Although the Submitted GCLP will be examined against the NPPF 2024, the NPPF 2026 will be the relevant material consideration in terms of national policy once adopted. In addition, all development plan polices which are materially inconsistent with the national decision-making polices (NDMPs) in the NPPF 2026 should be given very limited weight (Annex A, Paragraph 2). If adopted, the omission of support for higher densities would be materially inconsistent with Policy L3 of the NPPF26 which notes that within settlement boundaries, applications for development should involve an increase in density. Additionally Policy TC2 gives substantial weight to the benefits of intensification where it supports the overall vitality and viability of town centres. Accordingly, policy S/AMC should provide explicit support for densification.

This is also supported by the exploration of this area as a potentially suitable location for tall buildings in the Skyline and Tall Buildings Strategy as part of the Newmarket Road Area of Search. This should also be reflected in the policy wording, as supported by Policy L3 of the National Planning Policy Framework (NPPF, 2026) which notes that within settlement boundaries, applications for development should involve an increase in density. The reference in the policy to buildings that “complement” the skyline is subjective and does not explain how the acknowledged opportunity for intensification is to be balanced against townscape and heritage considerations. Instead, Policy S/AMC/FBG should establish that greater height is acceptable in principle where supported by appropriate townscape, heritage, environmental and design assessment.

An open mindset to densification is also beneficial as it may enable viability challenges to be overcome if present. The Draft Local Plan introduces a number of new policy requirements, including:

- Net Zero Operational Carbon (CC/NZ);
- Supporting a circular economy and sustainable resource use, including a greater emphasis on retaining existing buildings, which can be complex and costly to deliver, may reduce overall floorspace, and can affect market attractiveness (CC/CE);
- Biodiversity Net Gain of 20% (BG/BN);
- Accreditation under the Building with Nature Standards (BG/GI);
- Urban Greening Factor requirements (BG/UGF);
- Provision and enhancement of open space within commercial schemes (BG/EO); and
- Affordable Workspace requirements (J/AW).

Whilst these are positive and important aspects of successful development, they contribute to a higher cost base for development in Greater Cambridge than in many competing locations.In conclusion, the policy regarding Cambridge Areas of Major Change fails to adequately reflect the ambition for the densification of key sites and adds onerous controls such as Community and Cultural Plans which are duplicated elsewhere in the plan. The cumulative impact of these requirements risks undermining the delivery of development, particularly during the first five to ten years of the Plan period. This is in addition to potential CIL liabilities should this be adopted. The cumulative impact of these requirements represent a potentially major viability hurdle which could be lessened with densification. Otherwise, the plan as it stands risks rendering many opportunities unviable, meaning the district is unlikely to meet its projected employment needs.

Finally, the supporting text for Policy S/C/AMC: Cambridge Areas of Major Change highlights the importance of having an ‘over-arching framework or equivalent masterplan’ to ensure that development occurs in a ‘joined-up manner’. However, no reference is made in Policy S/AMC/FBG to the planning permission which was granted in April 2025 (ref: 23/02685/FUL). Instead, the supporting information references ‘The Grafton Area Masterplan and Supplementary Planning Document’ which was adopted in 2018, significantly predating the permission which has now been implemented. It is considered that this document can only be afforded limited weight due to the significant change in context since then.

Reference should instead be made in the supporting text to note that permission for the comprehensive redevelopment of the Grafton Centre has been granted and implemented.

Changes required to the plan

In addition to reference to the extant planning permission 20/02685/FUL in the supporting text, policy wording should be amended as follows:

1. Development proposals across this policy area for regeneration and densification, will be supported in principle. ~~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, a~~A~~n 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.~~ To support flexibility and vitality of town centre uses, a range of uses including residential is supported.

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. To support this intensification, taller buildings will be supported where suitably justified in a Townscape and Visual Impact Assessment.

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

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

Comments

Pioneer Group Ltd supports the overall policy objectives; however, the policy as drafted is overly prescriptive and should be amended to provide greater flexibility.

The policy wording states that new development must achieve net zero operational emission. To ensure the policy remains effective and deliverable, this wording should be amended to state that developments are *"encouraged to"* or *"should seek to meet the identified standards unless technical or viability reasons indicate otherwise"*. Without such flexibility, there is a risk that the policy could constrain the delivery of commercial development and sustainable growth across Greater Cambridge.

Given that several of the requirements exceed current Building Regulations standards, a more proportionate approach is required to ensure the policy remains effective and deliverable.

> Part A (Space Heating Demand) requires development to achieve a space heating demand of 15-20 kWh/m² GIA/year. While this reflects best practice standards associated with LETI and Passivhaus, it goes beyond national requirements and will have significant design and cost implications. Requiring compliance in all circumstances is unrealistic and fails to recognise the practical challenges associated with delivering development across different sites.
>
> Part B (Energy Use Intensity (EUI)) requires offices, research facilities and other non-residential development to align with the UK Net Zero Carbon Buildings Standard 2030 EUI targets. This approach is similarly prescriptive and relies on evolving benchmarks that may change over time. The policy should therefore provide flexibility rather than requiring strict compliance with standards that continue to develop.

As drafted, the cumulative effect of these requirements risks undermining the viability and deliverability of commercial development, contrary to the objective of supporting sustainable economic growth across Greater Cambridge. Furthermore, once adopted the policy would be immediately materially inconsistent with Policy PM13 (NPPF, 2026) which requires "clear and robust costed rationale" where energy requirements go above the Building Regs. In the absence of such rationale the policy would be rendered inconsistent and carry limited weight in decision making.

Changes required to the plan

In order to ensure the viability and deliverability of future commercial development, the policy should be amended to ensure that it is clear that new development is encouraged to achieve net zero operational emissions and that the use of offset payments is acceptable.

1. Where practical, n~~N~~ew development (with the exception of householder applications) must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand thensupplying all energy demand through onsite energy generation. Through the submission of an Energy Statement incorporating energy performance calculations undertaken using a methodology capable of providing accurate predictions of total in-use energy (such as CIBSE TM54 or the Passivhaus Planning Package), proposed new development will demonstrate the following hierarchical approach:

Net Zero Carbon buildings – operational emissions

Part A: Space heating

2. Achieve a specific space heating demand as follows:

a. All new dwellings must strive to achieve a space heating demand of 15 – 20 kilowatt-hours (kWh) per meter squared Gross Internal Area (GIA) per year.

b. All new non-domestic buildings must strive to achieve a space heating demand of 15 – 20 kWh per meter squared GIA per year.

3. All heating should be provided through low carbon fuels (not fossil fuels).

4. No new developments should be connected to the gas grid.

Part B: Total Energy Use Intensity (EUI)

5. EUI targets are achieved as per building type (set out in kWh per meter squared GIA per year) as follows:

a. All dwellings must strive to achieve an EUI of no more than 35 kWh per meter squared per year.

b. Non-domestic buildings must strive to achieve the following EUI where technically feasible and viable by building type:

i. Offices: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

ii. Schools: 65 kWh per meter squared per year.

iii. Multi-residential (e.g. student accommodation): Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

iv. Retail: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

v. Leisure: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

vi. Research facility: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

vii. Higher education teaching facilities: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

viii. Light industrial uses: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

ix. Hotel: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

x. All other non-residential uses: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).

Part C: Energy performance/Onsite Renewable Energy

6. Proposals must seek to maximise opportunities to generate on-site renewable energy and facilitate flexibility to enable the development, where possible, to achieve all energy demands through onsite energy generation.

7. Proposals that include battery storage to maximise the use of onsite energy generation will also be supported.

Part D: Energy Offsetting and Assured Energy Performance

8. Where economic viability or technical constraints prevent policy compliance, proposals must first and foremost strive to meet the space heating and total energy consumption thresholds. Proposals must then benefit as much as possible from onsite renewable energy generation. Energy offsetting should only be used as a last resort (for example where there is limited roof space to generate renewable energy). Offsetting payments must be used to invest in additional renewable energy generation to ensure that net zero carbon buildings are delivered. These offsets will primarily be delivered via developer contributions to a fund which would be ring-fenced for use only to deliver local projects that would deliver the required shortfall in renewable energy. In some cases, it may be acceptable for the developer to conduct direct delivery of these local energy offsetting projects rather than provide a financial contribution, subject to Council approval of the proposed projects based on meeting criteria around their effectiveness, suitability and guaranteed delivery timescales.

9. All applicable developments must demonstrate use of an assured performance method in order to ensure that the buildings' operational energy performance reflects design intentions and addresses the performance gap, which may be secured via condition.

10. For reporting purposes, all development over 50 homes and 5,000sqm GIA of employment floorspace should complete in-use energy monitoring. Net Zero Carbon Buildings – construction and embodied carbon

11. All major development must demonstrate, through the Sustainability Statement, what measures have been taken to reduce embodied carbon content as far as possible through lean design, choice of materials and material efficiency.

Proposals for large scale new-build developments (a minimum of 100 homes or a minimum of 10,000sqm GIA of non-residential floorspace) must submit a Whole Life Carbon Assessment using a nationally recognised whole life carbon assessment tool and demonstrate actions to reduce up-front embodied carbon emissions (modules A1-A5 of the RICS methodology – see Figure 102). This should include reducing emissions associated with construction plant.

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

Comments

Pioneer Group Ltd object to Policy WS/NC as drafted on the grounds that it places disproportionate obligations on commercial development, lacks certainty regarding the scale of infrastructure requirements, and will likely adversely affect development viability and deliverability of commercial developments to come forward.

The policy provides insufficient certainty regarding the extent and scale of contributions that may be required, making it difficult to accurately assess development costs, viability and deliverability of development proposals. A particular challenge when deciding to purchase a site before entering the planning process; planning policy should give a high degree of certainty to assess a site pre-planning.

Criterion 6 is particularly onerous in requiring contributions towards community and cultural facilities based on prescribed floorspace standards, alongside the submission of Community and Cultural Plans. The policy fails to recognise existing community, cultural and recreational facilities already provided with many commercial and employment developments. Furthermore, it does not adequately justify why commercial proposals should be expected to deliver such significant social infrastructure. Employees do not generate demand for local community and cultural facilities in the same way as residential developments.

Criterion 7 and 9 similarly place unreasonable expectations on commercial developments to provide or contribute toward sports and recreational facilities. The policy does not adequately account for existing provision, on-site facilities already delivered as part of employment campuses, or whether a development proposal would generate a demonstrable need for additional facilities. Any requirement for on-site provision or financial contributions should be evidence-based, proportionate and directly related to the impacts arising from the development.

Criterion 11 requires services and facilities to be delivered during the "early phases" of development. This lacks clarity and provides limited certainty for the timing as to when infrastructure and facilities would be expected to come forward. To ensure the policy remains flexible, it is recommended that the policy should allow the timing of delivery to be determined on a case-by-case basis, taking into account the scale and phasing of the development.

Changes required to the plan

Identifying and addressing needs

1. New development will be required to include or contribute to the delivery of the services and facilities necessary to meet the needs of the development and mitigate the impact of development on existing local facilities where there is a demonstrable need, and it is viable and deliverable to do so.
2. The scale and range of facility and service provision or contribution must be appropriate to the level of need (including the specific needs of different demographic groups) generated by the

development, and it must be adaptable to population growth and demographic changes. In making assessments of need and the timing of delivery of the facility or service, regard must be had to:

a. The capacity, quality, and accessibility of existing facilities in the locality; and
b. Any local strategies recognised by the Local Planning Authorities that seek to improve public health, indoor sports & recreation, social and cultural wellbeing, and the sustainability of communities.

3. Development of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in delivering the facilities off site. Acceptable provision and arrangements will be determined in consultation with service providers.
4. Proposals for residential sites of 200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure) and employment development of over 5,000 square metres must be informed by detailed assessments of both sports, recreation, culture and community needs, and include strategies that address identified needs. Submitted strategies to meet community and cultural needs must demonstrate that the local community and stakeholders have been engaged to guide the provision of community facilities to be introduced as part of the site-wide development strategy. Measures may be required to assist the development of a new community, such as through community development workers.

Indoor and outdoor community and cultural facilities

5. All residential development will contribute towards the provision of indoor and outdoor community and cultural facilities to meet the needs generated by the development. Development of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery. Other developments will contribute to off-site provision through planning obligations or through a Community Infrastructure Levy (CIL) as appropriate.
6. ~~Contributions for community facilities will be based on a standard of 129 square metres of such floorspace per 1,000 additional population. Contributions for cultural facilities will be 100 square metres per 1,000 additional population and 1.5% of Net Internal Area commercial space. This is based upon a combination of the Arts Council England benchmark and Museums, Libraries and Archives (MLA) Standard applied to the local context (using the Department for Culture, Media and Sport Participation Survey). For all applicable proposals, Community and Cultural Plans will form part of the planning submission process, and these must demonstrate a robust, evidence led and locally responsive approach for their provision and long-term viability. All plans should: identify the needs generated by the proposal; detail the provision required including their specification and delivery schedule; and provide details about their funding, stewardship and monitoring, to ensure their successful implementation. These plans will be secured through Section 106 agreements.~~

Indoor and outdoor sports requirements

7. Residential development must contribute towards both indoor and outdoor sports facilities including ancillary uses such as changing facilities appropriate to the scale and location of the development, informed by needs identified in the Indoor Sports Facility Strategy, Playing Pitch Strategy and Outdoor Courts and Rinks Strategy or successor documents. Where justified, provision can be off-site via financial contributions towards publicly accessible provision.
8. Commercial development should avoid adverse impacts on publicly available sports facilities with on-site provision for employees. Where justified, this provision can be provided off-site via financial contributions towards publicly accessible provision.

Leisure routes

9. ~~New development will be required to provide or contribute towards leisure routes, suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes include supporting Public Rights of Way Improvement Plans or providing leisure routes.~~

New burial grounds, cemeteries and crematoriums

10. Proposals for new cemeteries, burial grounds, natural burial sites, supporting buildings and extensions to existing facilities including crematoriums will be supported where it can be demonstrated that:
a. There is an identified need for additional burial provision for the community the proposal it intended to serve; The site is both accessible and close to the community it is intended to serve.
b. Burial facilities intended to serve new settlements, city-wide or sub-regional Proposed Submission Local Plan 2024 – 2045 549 c. communities would need to demonstrate that they are provided in a sustainable location, including supporting sustainable travel.
c. The proposal would not result in unacceptable impacts on the character, appearance or tranquillity of the location and includes appropriate landscaping, boundary treatments and planting;
d. The development would not conflict with Green Belt policy;
e. The development would not adversely affect groundwater Source Protection Zones (SPZ), surface water quality or the water environment in line with the Environment Agency's guidelines;
f. The proposal would not have an unacceptable impact on heritage assets and archaeological remains, to be assessed through appropriate investigation and mitigation where required;
g. Any traffic, parking, servicing, lighting or operational impacts would not result in unacceptable harm to residential amenity, local character or highway safety;
h. Where possible, existing trees, hedgerows, watercourses and other landscape features are retained and incorporated; and
i. That, where relevant, proposals should demonstrate how they respond to the burial requirements of different faith and community groups, including where these meet the needs of a sub-regional community.

Implementation

11. ~~The timely delivery of services and facilities will be required, including the provision of key services and facilities in early phases of the development.~~ Phasing will be established through planning obligations or conditions on a case-by-case basis, and this may include requirements for the use of meanwhile or temporary uses to ensure local needs can be supported until permanent facilities are delivered.
12. As appropriate to the nature of facilities and services provided, the developer will prepare management and maintenance strategies, to be approved by the Local Planning Authorities, to ensure robust and effective implementation, adoption and maintenance in the long term.

Policy GP/ST: Skyline and tall buildings

Comments

Pioneer Group Ltd consider that this policy is overly restrictive and should be amended to provide greater flexibility and ensure that decisions are based on a balanced assessment of planning considerations and allow delivery of Cambridge's growth aspirations without unnecessarily conflict with wider aspirations for the optimisation of brownfield land.

The policy adopts a cautious approach to tall buildings and places significant limitation on opportunities to optimise development capacity. This is of particular concern for commercial development, where building upwards in appropriate locations 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 these appropriate locations, taller buildings can make a positive contribution to sustainable development and economic growth. This is especially true in brownfield locations such as the Fitzroy/Burleigh Street/Grafton Area of Major Change (Policy S/AMC/FBG) where densification can provide vitality and ensure the best/ most efficient use of previously developed land. For example, Part 4 of Policy S/AMC/FBG states that proposals at the Grafton Shopping Centre should include 'significant uplift in floorspace' which may require an increase in height above the Urban Zone Height Threshold of 19m. This has been demonstrated as capable of being acceptable through the extant planning permission 23/02685/FUL. Indeed, Policy L3 of the National Planning Policy Framework (2026) [NPPF26] notes that within settlement boundaries, applications for development should involve an increase in density. Therefore, to ensure that policies are materially consistent with national policy when used for development management, policies should respond to the NPPF26, by providing additional support for densification. Pioneer Group Ltd therefore propose that Areas of Major Change are not subject to Policy GP/ST.

Additionally, densification serves to aid with viability of delivery, especially in the context of potential future CIL liabilities and the requirements of the new Plan when considered as a whole. Where densification is required to support other significant benefits, such as the vitality of town centres as outlined in Policy TC2 [NPPF, 2026] it should be supported. Additionally, the Inspector's call-in decision relating to the Beehive Centre (Appeal ref: APP/Q0505/V/25/3360616) found that additional height was not directly equivalent to harm. At IR13.19 the decision states "The scheme would not harm the townscape of wider Cambridge. The parameter plan and Design Code would ensure that the development was divided visually into separate parts, that the mass was broken up through varied elevational design and material tones, and that an interesting roof profile was created, thus reducing the scheme's perceived bulk." Therefore through effective design choices, the harm arising from densification and taller buildings can be suitably mitigated.

In addition Criterion d notes that proposals in Cambridge 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, including the Cambridge Commons'. The scale of development already occurring in Cambridge and several extant planning permissions is such that this is not an accurate description of the existing skyline and should be deleted.

Criterion e states that "applications must demonstrate that there is no adverse impact on neighbouring buildings and open space…" (emphasis added). 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. To be consistent with national policy and be considered sound, this must be addressed.

Changes required to the plan

The current wording establishes an unreasonable "no adverse impact" test, rather than applying the balanced approach expected through the planning process. It must be changed to "no unacceptable impact".

An exemption should be applied to Appendix H at paragraph H.25 which notes that "Where extant planning permissions have provided suitable assessment to demonstrate that the proposal will not cause inacceptable impacts, no further assessment is required within those parameters."

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 ~~only~~ be supported where they demonstrate a positive response to their wider setting and satisfy 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 landscape and townscape and demonstrate how the proposal maintains or enhances the character and quality of the skyline. Proposals for tall buildings will be assessed on a site-by-site basis with the expectation that a robust evidence base will be provided to demonstrate that they are appropriate to their context;

b. Impact on the historic environment – applicants must demonstrate and quantify the potential harm of proposals to the significance of heritage assets or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis. These will include impact on key landmarks and viewpoints (identified in Appendix I) and 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, 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, including the Cambridge Commons;~~

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

d. Design quality – applicants must demonstrate how their proposals create high quality, 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 to ensure a well-articulated skyline. 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 that there is no unacceptable ~~adverse~~ impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking, overshadowing, overheating, glare and reflectivity. Proposals must demonstrate through appropriate technical testing that acceptable microclimatic conditions will be achieved and that opportunities have been taken to minimise urban heat island effects, including through design responses to wind, thermal comfort and surface overheating, and that there is adequate daylight to habitable rooms and sunlight to external spaces both within the proposals and to neighbouring properties and open spaces; and

f. Suicide prevention – applicants must demonstrate how their proposal incorporates proportionate design measures to reduce access to means of suicide having regard to the height, form and public accessibility of the building. Design will be determined by the structure of the buildings and its surroundings.

Policy J/AW: Affordable workspace and creative industries

Comments

Pioneer Group Ltd objects to Policy J/AW as unsound and considers its drafting raises legal compliance concerns under section 19(2) of the Planning and Compulsory Purchase Act 2004 (regard to national policy). The objection is tested against the four tests of soundness: positively prepared, justified, effective, and consistent with national policy.

Criterion 1 catches office and R&D development "over 1,000 square metres" with a minimum 30% (or 20%) rent discount "in perpetuity." The 30% tier alone applies across the Defined Development Extent of Cambridge and sixteen named science and business parks (para 8.50, which is the knowledge-intensive floorspace Policy S/JH relies on). Unlike affordable housing, which has extensive, tested national policy behind it, NPPF contains no equivalent mandate for discounted commercial floorspace held in perpetuity, this is a locally invented obligation with no defined review or release mechanism if the identified need reduces over a building's life. It permanently impairs asset value, not merely development-stage viability, and the evidence base does not appear to model that long-term effect.

The impact on development-stage viability, when all other cumulative requirements from the new Local Plan and potential future CIL Viability is taken into account, is such that the required employment projections set out in Policy S/JH are unlikely to be met. Whilst many of the individual policies are proposed for valid reasons and support Greater Cambridge's ambition to achieve high quality development, their cumulative effect presents a significant risk to the deliverability of future schemes. The delivery of 73,200 jobs during the Plan Period, or even more as set out under the recently adopted Local Growth Plan, therefore risks being undeliverable with such constraints on developers.

Criteria 3(b)(ii) and 3(c) turn on matters "demonstrated to the satisfaction of the Council", which is an undefined test. Criterion 3(b)(i)'s route via an "approved list" of providers cannot presently be relied on, since paragraph 8.55 confirms the list "will be developed ahead of adoption" and so does not yet exist. Payment in lieu is restricted to four narrow circumstances (criterion 4), with any general viability case requiring a full independently assessed open-book assessment, the one general discount for high fit-out typologies like R&D (para 8.43) is confined to supporting text, undefined in amount, and purely discretionary. Pioneer Group request that this is added into the main policy text.

Criteria 4 accepts for payment in lieu under specific circumstances, however Pioneer Group Ltd note that where developers have significant landholdings across the district it may be more appropriate to deliver affordable workspace elsewhere in a more meaningful contribution on a different Site which is not necessarily near to the development as stipulated by part 3(f). Clearer provision for offsite contribution should be added into the policy to ensure that the best quality affordable workspace is provided in the best locations, rather than a blanket requirement on each individual development. Similarly, in order to support the diverse needs of start-ups and SMEs who seek to occupy these spaces, the policy should make clear that the affordable workspace should be delivered to CAT A fitted out space. This also helps to reduce the environmental costs of wasted fit outs where occupiers needs may differ.

This is a further, cumulative burden on scheme delivery, and Pioneer Group understand it is not alone in that view. J/AW's 10% floorspace-in-perpetuity obligation, plus an annual monitoring requirement for the life of the building, sits on top of Policy WS/NC's community needs assessment and contributions, Policy BG/EO's 2.0 hectares per 1,000 employees open space standard, and Policy CC/CE's compliance costs, all capable of applying to the same office or R&D building. Unless the whole-plan Viability Assessment (para 2.27) has modelled this cumulative effect on representative office and R&D typologies, rather than testing J/AW in isolation, the policy risks being neither justified nor effective, undermining delivery of Policy S/JH's own 73,200 jobs requirement.

Changes required to the plan

1.Subject to viability, ~~P~~proposals for new office and R&D development (use classes E(g)i and E(g)ii) over 1,000 square metres will be required to provide a minimum of 10% of net additional floorspace (GIA) as affordable workspace.

a. Within the Defined Development Extent of Cambridge and allocations on the edge of Cambridge, and within specified established science and business parks in Greater Cambridge and proposed extensions to these allocated within this Plan, the affordable workspace discount should be a minimum of 30% below prevailing market rents in perpetuity.

b. Within South Cambridgeshire, outside the Defined Development Extent of Cambridge and specified established science and business parks, the affordable workspace discount should be a minimum of 20% below prevailing market rents in perpetuity.

2.Proposals for new Industrial and Storage developments (use classes E(g)iii, B2 and B8) over 2,500 square metres will be required to provide a minimum of 10% of net additional floorspace as affordable workspace (GIA) at a minimum of 20% below prevailing market rents in perpetuity.

3. The details of the form and nature of affordable workspace to be provided will be agreed with the councils on a case-by-case basis however, the following requirements will apply when affordable workspace is secured:

a. The type and specification of affordable workspace must address an identified local need. Workspace types may be affordable artist studios, office, research and development, light industrial or general industrial workspace and maker spaces in light industrial use.

b. Subject to paragraph 3c. below, affordable workspace schemes must be operated and managed:

i. By an affordable workspace provider on the Councils' approved list; or

ii. By the owner, or alternative party, where it is demonstrated to the satisfaction of the council that they have the necessary skills and experience.

c. Where occupiers are from specific sectors that have cultural or social value such as cultural organisations, charities, public health services, voluntary and community organisations, the councils will explore opportunities for long term management and delivery of workspace by the occupiers, in which case it will need to be demonstrated to the satisfaction of the Councils that the occupiers have the necessarily skills and experience to do so.

d. Where affordable workspace is required:

i. An Affordable Workspace Statement must be submitted at the outline or full planning application stage;

ii. An Affordable Workspace Operational Management Plan must be prepared by the developer, submitted to and approved by the Councils at least three months prior to the first occupation of the development;

e. The affordable workspace should be made available for occupation at the same time as, or prior to, the first occupation of 50 percent of the non-affordable element of the remaining economic floorspace in the development, unless justified on site specific circumstances. The

50% threshold may be reviewed through viability evidence or phasing discussions on particularly large or complex schemes; and

f. Affordable workspace secured should be provided on-site unless a suitable alternative location within a suitable location near to the development, such as within the science or business park in which the development is located, is agreed with the councils.

g. Affordable workspace should be delivered as shell or CAT A fit out to allow for flexibility of occupiers

4.Off-site provision, or ~~P~~payment in lieu will only be acceptable in the following circumstances:

a.Where an occupier requires exclusive use of a single office property, such as a global headquarters building, evidenced by a signed agreement for lease, pre-let or owner-occupier commitment confirming the exclusivity requirement; or

b.Within developments involving multiple landowners, where the applicant demonstrates that coordinated on-site delivery and long-term management has been explored and is not reasonably achievable; or

c.Where the applicant and Councils agree that an off-site provision or in-lieu contribution would deliver materially greater economic, operational or placemaking benefit than on-site provision; or

d.Where the applicant demonstrates, through an independently assessed open-book Viability Assessment undertaken in accordance with the Councils' adopted viability methodology, that on-site provision is not viable.

5. Where fit out costs are likely to be high, for example in R&D or workshop space the proportion of affordable workspace provided could be lower than the policy requirement given the lower values associated with this type of space. The proportion of discounted floorspace in these cases will be determined through consideration of site characteristics and viability.

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

Comments

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 as amended in 2020, 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 does not provide sufficient evidence to justify this position. 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' whereby the applicant seeking a change of use is responsible for providing any necessary mitigation resulting from that change, rather than existing established uses being restricted.

Part 5 of Policy J/RC restricts proposals which would result in "the loss of any retail or other main town centre use", which is in direct conflict with national policy which works to support the flexibility of town centre uses and provide a 'positive approach to their growth' (NPPF, 2024). As it stands, the policy wording does not reflect the changes afforded by the amendments to the Use Class Order in 2020 and consequently is overly restrictive in the acceptable uses for the area. The 2020 Regulations created Class E and brought together a wide range of former retail, financial and professional service, restaurant, office, research and development, light industrial and other commercial and service uses, meaning that changes between these uses no longer requires planning permission under most circumstances. The

policy should recognise the role of Class E in enabling buildings and floorspace to respond to changing occupier requirements without repeated applications for planning permission.

Instead, the policy should focus on supporting the vitality of town centres through allowing flexibility as outlined in Chapter 7 of the NPPF (2024) and particularly under paragraph 90(a) where planning policies should support town centres to "grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters" (NPPF, 2024).

Changes required to the plan

Paragraph 5 should be removed from Policy J/RC to reflect the flexibility afforded by the 2020 amendments to the Use Class Orders and in accordance with Paragraph 90(a) of the NPPF (2024) which allows for diversification of town centres in response to industry changes.