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# Response to Regulation 18 Draft Greater Cambridge Local Plan

On behalf of Turnstone  
Real Estate Limited

Land to the south of  
Butt Lane, Milton

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JANUARY 2026

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# Contents

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1	Introduction	2
2	Site & Surrounding Context	4
3	Planning History	5
4	Proposed Development	10
5	Summary of Objections	13
6	Policy S/JH - Employment Need	14
7	Policy S/DS – Development Strategy	16
8	Site Assessment	23
9	Summary	27

Appendix 1 - Site Promotion Plan

Appendix 2 - Vision Document

Appendix 3 - Green Belt Assessment

Appendix 4 - Landscape and Visual Appraisal

# 1 Introduction

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- 1.1 These representations are submitted to the Regulation 18 Draft Greater Cambridge Local Plan (“Draft GCLP”) (December 2025) on behalf of Turnstone Real Estate Limited (“TREL”) in respect of land to the south of Butt Lane, Milton (“the Site”).
- 1.2 The Site is owned by the Diocese of Ely (“the DoE”). TREL has been selected as the DoE’s development partner and the parties have been working collaboratively to develop proposals for the sustainable redevelopment of the Site.
- 1.3 TREL and DoE consider that the Site offers a unique opportunity to assist and contribute to meeting the employment growth requirements of Greater Cambridge in a sustainable manner. In particular, the Site:
  - is well located on the urban fringe meeting the specific locational requirements of the trade counter and wholesale sub-sector of the industrial land market;
  - offers immediate access on the local road network;
  - does not require significant infrastructure upgrades;
  - represents Grey Belt land and hence will have no adverse impact on the wider Green Belt;
  - is deliverable immediately to assist meet the urgent needs of the industrial land sector, particularly for uses already/due to be displaced to enable mixed use development to be delivered on large allocated sites.
- 1.4 These representations are structured as follows:
  - Section 2 describes the Site and the surrounding context;
  - Section 3 explains the relevant planning history;
  - Section 4 provides an overview of the proposed development;
  - Section 5 summaries TREL’s objections to the Draft GCLP;
  - Section 6 describes the objection to employment need (Policy S/JH);
  - Section 7 explains the objection to the Development Strategy (Policy S/DS);
  - Section 8 explains the objection against the failure to identify the Site as a proposed allocation (Policies S/EOC and S/RRA);
  - Section 9 provides overall conclusions.

- 1.5 The DoE previously promoted the Site through the Calls for Sites process, including in March 2025. Alongside TREL, the DoE will also be submitting separate representations which relate to the Site, as well as wider aspects of the Draft GCLP.

## 2 Site & Surrounding Context

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- 2.1 The Site is located immediately to the north east of the City of Cambridge and immediately to the west of Milton which is defined in the Draft GCLP as a Minor Rural Centre.
- 2.2 The Site is broadly rectangular in shape and predominantly flat.
- 2.3 The eastern boundary of the Site is defined by the A10, which separates the Site from the built-up area of Milton to the east. An existing pedestrian bridge over the A10 provides connectivity between the Site and the residential communities in Milton.
- 2.4 The southern and western boundaries are marked by a linear public drain, dense tree plantation and hedgerows. Butt Lane bounds the northern edge of the Site, which is also defined by well established trees and hedgerows, albeit with some breaks/gaps.
- 2.5 The northern portion of the Site accommodates the existing Milton Park and Ride, a surface level car park accommodating approximately 800 spaces, which is owned by the DoE and leased to the operator, Cambridge County Council.
- 2.6 To the south of the Park and Ride is a rectangular parcel of land that recently secured planning permission for a new Police Station, which is currently under construction – this land is excluded from the Site promoted in these representations. To the south, east and west of the Police Station is agricultural land in arable use.
- 2.7 Immediately to the south and west, beyond the established tree belt, locates the Milton Landfill site, and to the north west the Milton Household Recycling Centre. To the north of the Site, beyond Butt Lane, are agricultural land holdings.
- 2.8 The Site benefits from existing vehicular access points from both the A10 and Butt Lane. Approximately 200m to the south is the A14 and its interchange with the A10.
- 2.9 A site location plan is attached at **Appendix 1**.

# 3 Planning History

## The Site

3.1 The Site has been subject to two recently granted planning permissions.

### Police Station

3.2 In March 2021, permission ref 20/04010/FUL was granted for a new police station within the central portion of the Site. The permission comprises a two-storey building containing offices, custody suite and associated facilities, new access, internal access roads, hardstanding, car parking areas and landscaping.

3.3 A copy of the site plan is extracted at Figure 1.

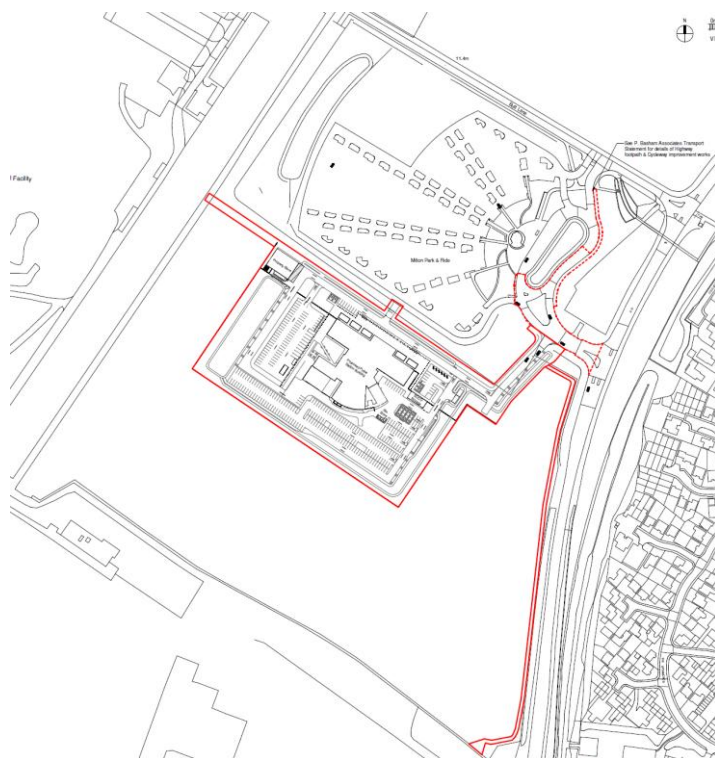


Figure 1: Approved Police Station site plan

3.4 The Council’s assessment of the proposals was made in the context of the former National Planning Policy Framework (“NPPF”) ie prior to the Government’s recent alterations in December 2024 to Green Belt policy and the introduction of Grey Belt.

3.5 In respect of Green Belt matters, the officer’s report concludes as follows:

*“The submitted Green Belt Assessment concludes that the proposed site ‘is the least sensitive due to its location next to the landfill site and context provided by the Milton Park & Ride. It’s landscape and visual characteristic, and context also play a significant role in lowering the*

*sense of openness one would associate with the open countryside around Cambridge'. Officers agreed with this assessment."*

- 3.6 Paragraph 77 of the officer's report notes that planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. It is explained that whilst the scheme is contrary to Policy S/7 (ie there is no express policy supporting this type of development outside the framework boundary), material considerations including its limited landscape characteristics and value, and the immediate land use context of the park and ride and landfill weigh in favour of departing from the provisions of Policy S/7 in supporting the proposal.
- 3.7 The permission as subsequently varied twice under Section 73 – Ref No: 21/04597/S73 granted on 22 April 2022 and Ref No: 24/01020/S73 granted on 7 June 2024. We understand construction works have now commenced on site.

### Electric Vehicle Charging Hub

- 3.8 In July 2025, permission ref 25/01460/FUL was granted for the erection of an Electric Vehicle ("EV") Charging Hub for 12 No. vehicles with canopy, charging stands, substation, signage totem, landscaping and access.
- 3.9 Figure 2 shows the application boundary which lies to the south east of the Park and Ride and immediately east of the consented police station.



**Figure 2: Approved EV charging facility site plan**

- 3.10 In considering the principle of the development, the officer's report notes that Policy S/7 of the South Cambridgeshire Local Plan (2018) states that outside development frameworks, only allocations within Neighbourhood Plans that have come into force and development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in this plan, will be permitted. In this context the officer's report concludes:

*"Given the high demand for the provision for ultra rapid electric vehicle charging points within the district, as well as their requirement to be specifically located near to main roads (A10 and*

*A14 in this instance), the proposal within this location is considered to be acceptable in principle”.*

3.11 Unlike with the Police Station applications, this proposal was considered in the context of the revised NPPF, and specifically the Grey Belt definition. The officer’s report considers the Grey Belt status of the site and draws the following conclusions:

- *“...the site lies outside of any large built-up area and would not result in the sprawling of an existing built up area. Given the remoteness of the site, it is considered that the proposal would not undermine purpose a).”*
- *“...the proposal would not undermine the purpose of towns merging together due to the location of the site being adjacent to the A10 and not a town.”*
- *“The site is not located within the setting of any historic town within the near vicinity and therefore would not undermine the purpose of criterion d).”*

3.12 As a result, the officer report resolved that:

*“...it is considered that the site does constitute Grey Belt land by definition and is therefore not inappropriate development within the Green Belt, and therefore no very special circumstances are required to be demonstrated in this instance.”*

3.13 Consistent with paragraph 155 of the NPPF, the report then goes on to consider the impact of the development on the remaining Green Belt across the area of the plan (para 155a). It comments that the development would not undermine Green Belt purposes a), b) and d). In response to criteria c) and e) (of paragraph 143 of the NPPF), the officer determined that *“the proposal would to some extent result in some encroachment into the countryside however this encroachment is considered to be relatively restricted and would take up a very small proportion of countryside land when taking into account the total amount of countryside land within the district and the requirement for the provision of ultra rapid EV charging points.”*

3.14 On this basis the proposal was considered to accord with paragraph 155(a).

3.15 Overall, it was concluded that:

*“...it is considered the proposal does fall within the definition as Grey Belt, in accordance with Footnote 55 of paragraph 153 of the NPPF, and is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness. As such, the proposed development would not be inappropriate development within the Green Belt and therefore no very special circumstances would be required in this instance.”*

## Surrounding Area

### Household Recycling Centre and Landfill

- 3.16 On 7 December 2022 planning permission Ref No: CC/21/259/FUL was granted for the redevelopment and expansion of the Milton Household Recycling Centre (“HRC”) to the north west of the Site.
- 3.17 The officer’s report to committee explains that the proposed operations fall within the types of development listed in the NPPF, as not being inappropriate development in the Green Belt. The report explains that the enlarged and redeveloped HRC is located within an area that is completely screened from the surrounding area on all four sides by the raised contours of the adjacent Milton Landfill to the immediate north-west and south-west, and by a thick belt of trees/woodland that adjoins the immediate north-east side and south-east. The HRC site is not considered to be visible from any publicly accessed location, other than a glimpsed view of the signs at the entrance to site, from the junction of the access road where it meets Butt Lane. Overall, the development was not considered to be in conflict with the purposes of the Green Belt and as a result was not considered to be inappropriate development.
- 3.18 On the same day, a related planning permission Ref No: CCC/21/261/VAR was granted to vary the land restoration scheme associated with the Milton Landfill to the west and south of the Site. The extant permission requires the Landfill to be completed and restored by 31 December 2026, and this application sought to make alterations to the restoration scheme to reflect the expansion of the Milton Household Recycling Centre. The revised restoration plan confirms that improvements are to be made to density of the hedgerow boundary along the southern boundary of the Site.

### Segregated Guided Busway

- 3.19 The Greater Cambridge Partnership is proposing to develop a new 6.5km segregated guided busway and travel hub to improve public transport connections between the new town of Waterbeach and the City of Cambridge. The busway route will link to the relocated Waterbeach railway station, Cambridge Research Park, and the existing busway alignment serving Cambridge Regional College, the Science Park, Cambridge North station, and the city centre. It is understood that a dedicated walking, cycling and horse-riding route will run alongside the bus route.
- 3.20 The off-road busway alignment will tie in with Butt Lane immediately north of the Park and Ride situated on the northern portion of the Site. The route will then continue along a short section of Butt Lane towards Impington, before heading south on a separate off-road alignment to join the existing Guided Busway near Orchard Park.
- 3.21 An EIA Screening Opinion was issued by Cambridge County Council in September 2024 (ref 24/03090/SCOP) and an application is expected to be made shortly under the Transport for Works Act Order. Figure 3 shows the indicative application boundary.

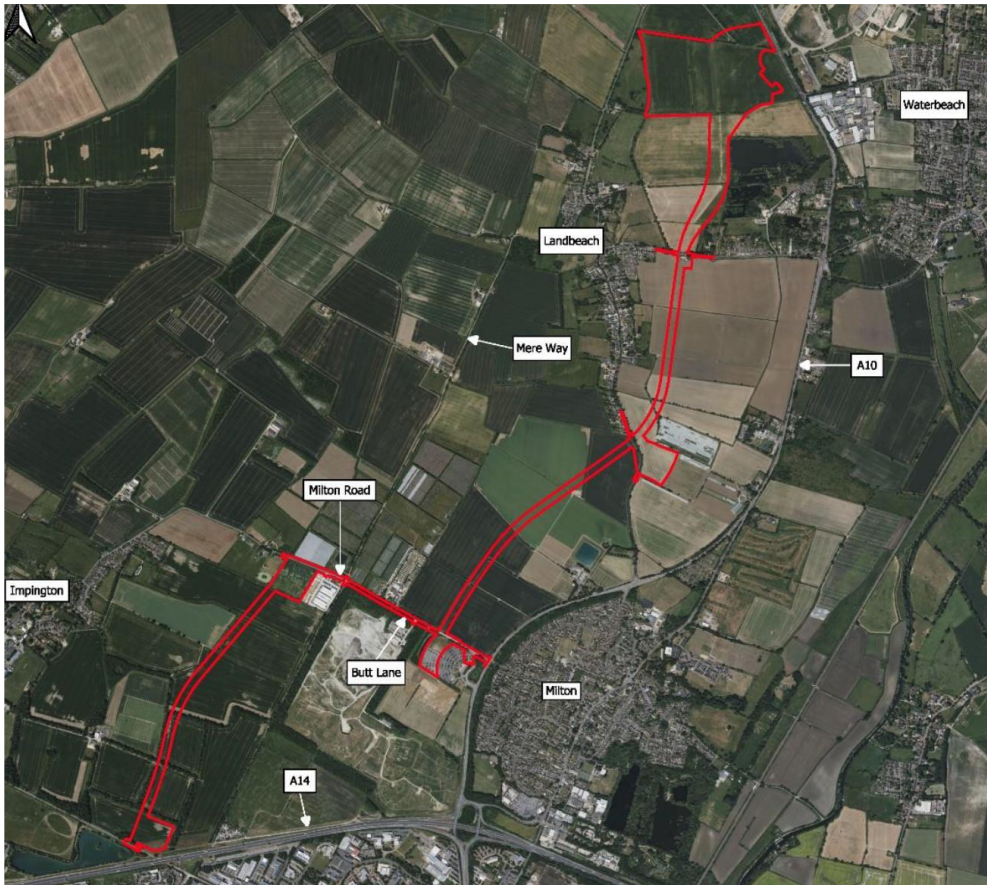


Figure 3: Waterbeach to Cambridge Guided Bus indicative application boundary

### Summary

3.22 In summary, the following noteworthy conclusions can be drawn from the planning history:

- Permission has been granted for a new two storey strategic Police Station facility. The decision was made prior to the December 2024 NPPF amends to Green Belt policy, but nonetheless it was recognised that:
  - the sensitivity of the site was reduced due to its location next to the existing landfill and Park and Ride; and
  - the limited landscape and visual characteristics of the site played a significant role in lowering the site’s sense of openness with the open countryside.
- The EV Charging Hub application was considered against the revisions to the NPPF and it was concluded that the site was Grey Belt land, as it did not ‘strongly contribute’ to purposes a), b) or d), and its loss would not ‘fundamentally undermine’ the remaining Green Belt.

## 4 Proposed Development

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- 4.1 TREL, in conjunction with DoE, has been investigating options for the redevelopment of the Site. A specialist consultant team has been appointed comprising:
- Masterplanning – LDA Design
  - Landscape & Visual – LDA Design
  - Green Belt – LDA Design
  - Transport - KMC Transport Planning
  - Planning – Quod
- 4.2 The Site occupies an important location on the urban fringe, with immediate access onto the A10 and excellent proximity to a local resident population. These conditions are identified in the evidence base to the Draft GCLP (in particular the Greater Cambridge Warehouse and Industrial Space Needs (March 2025)) as being important locational requirements for specific sub-sectors within the industrial market. However, very few sites with such conditions exist across Cambridge.
- 4.3 As a result, the vision for the Site is to accommodate employment floorspace to assist meet the significant growth requirements across Greater Cambridge, with particular focus on displaced industrial uses (to enable the delivery of site allocations), and the needs of trade counter and wholesale operators, and the MidTech sector, that require an urban fringe location.
- 4.4 It is anticipated that the Site will be delivered in two phases. Phase 1 comprises land to the south of the Site ie land to the south of the Police Station, and Phase 2 relates to the land to the north ie existing Park and Ride facility.
- 4.5 The Phase 1 land is enclosed by the Police Station, EV Charging Hub and Park and Ride facility to the north. To the south and west it is bounded by dense vegetation separating the existing landfill site, which is to be further enhanced by the recently approved restoration plan. To the east the Phase 1 land is defined by the A10. The Phase 1 land is, therefore, visually contained and is not a sensitive location. Furthermore, building on the planning decisions of the Police Station and EV Charging Hub, the Site would clearly represent Grey Belt land.
- 4.6 It is proposed that the Phase 1 land accommodate c.32,500sqm of employment floorspace, within units of between 250sqm and 2,500sqm to specifically target the requirements of displaced users, as well as trade counter and wholesale operators.
- 4.7 Phase 2 represents a longer term opportunity that would only arise if the strategic decision was taken to remove the current Park and Ride facility. It should be emphasised that at this stage neither TREL or DoE are promoting the removal of the Park and Ride from the Site, but we are aware that as part of the wider Greater Cambridge transport strategy consideration will

need to be given to the appropriate location of such facilities. Should, at a future point, it be decided that the Park and Ride should be remodelled (perhaps as part of a sustainable travel hub serving the needs of the northern science park cluster, including decked parking), as previously developed land the opportunity would be available to redevelop the Site for employment led uses (c.27,500sqm) – again most likely focussed on displaced users and trade counter/wholesale/MidTech operators to benefit from the Site’s urban fringe location.

4.8 A Vision document has been prepared by LDA Design (**Appendix 2**) which outlines, for illustrative purposes, a potential masterplanning approach to the redevelopment of the Site across Phases 1 and 2.

4.9 The characteristics of the Site and the surrounding area support its redevelopment for employment led purposes, in particular:

- **Green Belt:** The Site comprises Green Belt land being previously development land, or land that does not strongly contribute to Green Belt purposes, as reflected in the Police Station and EV Charging Hub decisions. By definition the land is poorly performing Green Belt which would have no undermining effect on the wider Green Belt.
- **Strategic Connectivity:** It is well known that significant infrastructure investment is required to support the scale of growth proposed across Greater Cambridge. However, the Site benefits from established transport connections to strategic infrastructure meaning that there is no obstacle to its delivery in infrastructure terms.
- **Local Connectivity:** The Site will benefit from existing infrastructure commitments such as the Waterbeach to Cambridge Busway, a number of north-south cycle improvement schemes such as the Mere Way and the Waterbeach Greenway, and improvements to the A10. This puts the site at the convergence of a number of transport networks making it ideal for redevelopment. The combined Phase 1 and Phase 2 sites, if comprehensively redeveloped, also presents an opportunity to facilitate and complement these investments through further measures which could include:
  - a strategically important east-west cycle connection between Impington and Milton via Butt Lane
  - enhance the bridge crossing of the A10
  - creation of super mobility hub associated with Waterbeach Busway along Butt Lane benefiting residents within Milton and Impington
  - a rationalisation of the road network around the Butt Lane junction with the A10.
- **Topography and Drainage:** The Site is generally low lying and flat which is mirrored within the landscape to the north, being part of the wider Fen landscape. The exception is made-ground associated with Milton landfill which rises around the west and south of the Site. The Site is outside of fluvial flood areas, but is affected by surface water flooding

along the eastern boundary adjacent to the A10. Attenuation features will be located in this area which acts as an opportunity to create habitat and visual amenity.

- **Green Infrastructure:** The site is located within Area 2B Cottenham Fen Edge Claylands within Greater Cambridge Landscape Character Assessment (2021) which is predominantly an arable landscape with medium sized fields arranged in irregular rectilinear patterns defined by straight historic ditches (i.e. Thirteenth Public Drain) and droveways (i.e. Mere Way to the). A number of visually strong tree belts are located along the A10 and around Milton landfill which provide a level of enclosure to the Site, along with the raised ground associated with the latter. Given the general lack of vegetation within the Site, there are opportunities to improve green infrastructure connections along Butt Lane through additional tree planting, that would also help to soften views to development from open fenland landscape to the north. Ditches, trees and planting could also extend into the Site using rectilinear patterns to enhance Fen landscape and help create a distinctive place that attracts people and nature to thrive – especially through improved connectivity to the residential communities in Milton.

## 5 Summary of Objections

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- 5.1 TREL and their consultant team have carefully reviewed the Draft GCLP and its associated evidence base. TREL object to the exclusion of the Site as an allocation to assist meet the significant employment growth requirements across Greater Cambridge, particularly due to the specific site characteristics which respond positively to the aspirations of the GCLP and its supporting evidence base.
- 5.2 In this context, these representations set out objections to the following:
- Employment need (Policy S/JH)
  - Development Strategy (Policy S/DS)
  - Site assessment and allocations (Policies S/EOC and S/RRA)
- 5.3 Each of the above is described in more detail in the sections that follow.

## 6 Policy S/JH - Employment Need

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- 6.1 The Draft GCLP sets a jobs related ‘strategic priority’ which seeks to “*encourage a flourishing, dynamic and mixed economy in Greater Cambridge which includes a wide range of jobs, while maintaining our area’s global reputation for education, research and innovation.*”
- 6.2 The explanatory text explains that Greater Cambridge’s fast-growing economy is driven by successful partnerships between academics, business, investors and local government, and outlines a commitment to sustainable and inclusive growth, which competes at a global level.
- 6.3 To achieve this strategic priority an ambitious approach is required to the delivery of jobs and economic floorspace. However, this is not reflected in the additional jobs figures identified in Policy S/JH – 73,330 jobs to 2045.
- 6.4 The Greater Cambridge Employment and Housing Needs Update (September 2025) (“EHNU 2025”) and the Greater Cambridge Warehouse and Industrial Space Needs (March 2025) (“WISN 2025”) represent two key evidence base documents.
- 6.5 The EHNU 2025 considers various scenarios to assist determine the policy approach that should be adopted for employment growth. The evidence explains that the during the period between 2010 and 2020, the economy grew by almost 4,000 jobs per annum (average annual change) – referred to as the ‘High’ scenario. The document cautions against this scenario moving forward, noting that it includes the ‘bounce back’ following the trough in 2010-2012. However, even allowing for the more severe and highly unusual decline associated with the Pandemic over the period between 2010 and 2023, the economy still grew by almost 3,650 jobs per annum (average annual change).
- 6.6 Instead, it is suggested that a ‘Central’ scenario should be adopted based on a growth of 3,490 jobs per annum. This is said to rely on the period seeing strong growth, but it builds in an assumption that there will be a slower or contracting periods in the economy.
- 6.7 Whilst economic turbulence is inevitable, especially when projecting over a c 20 year period, the establishment of planning policy should be configured to reflect the intended ambition and aspiration regarding growth. In this case, the Draft GCLP seeks to drive Cambridge’s fast growing economy, and improve its ability to compete on the global scale. However, this ambition is not reflected in the proposed additional job number which is based on an average jobs per annum that is less than what has been achieved between 2010 and 2020, and even less 2010-2023 when reflecting the implications of the Pandemic.
- 6.8 This approach does not align with the scale of economic ambition sought across Greater Cambridge. As a minimum the policy should be based on the growth rate achieved in the decade up to 2020. This would assume that the economy sustains the previous absolute level of growth over the plan period, with the larger economic base created year on year making it an achievable objective. This ‘policy-on’ approach better reflects the intent for economic growth across Greater Cambridge.

- 6.9 It should also be noted that para 2.10 of the Draft GCLP refers to the central case as the 4,000 additional jobs per annum, however, this is not consistent with the EHNU 2025.
- 6.10 The increase in additional jobs per annum will clearly have an associated implication on the scale of employment floorspace to be accommodated, which would need to be revised accordingly.
- 6.11 The current evidence base converts the proposed additional job number into a floorspace requirement having considered a series of factors. One key factor relates to the allowance made for displaced existing employment space. Section 3 of the WISN 2025 describes the existing industrial land context across Greater Cambridge, and highlights the number of existing estates that are due to be lost as a result of site allocations for mixed use development eg Clifton Road, Cowley Road, Nuffield Road, Milton Road, Dales Manor, South Cambridgeshire, Trinity Hall, etc.
- 6.12 Many of these estates comprise smaller units containing 'population serving uses' such as trade counters, wholesalers, vehicle repairs, etc.
- 6.13 Furthermore, the evidence base also recognises that a significant proportion of the existing industrial stock is aging. It is estimated that 53% of the industrial stock is pre 1990, which might equate to c.100,000sqm that may be at risk of loss/redevelopment.
- 6.14 The evidence base acknowledges the historic levels of loss as a result of the normal churn in the property market. However, the assumptions presented only allow for between 25% and 50% of losses to be replaced on new sites, despite acknowledging the pressure on the aging stock and the existence of significant suppressed demand across many industrial sectors, particularly wholesale.
- 6.15 As a result, the proposed industrial need requirement of 317,000sqm set out in paragraph 2.12 is considered to be an under-estimate of the overall requirement if market signals are appropriately applied, particularly in respect of existing floorspace that will be displaced by mixed use allocations, the significant scale of aging industrial stock that may be lost/redeveloped, and the scale of suppressed demand.
- 6.16 The policy and evidence base should be updated accordingly, including having regard to the revised additional job number as described above.

## 7 Policy S/DS – Development Strategy

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- 7.1 Section 2 of the Draft GCLP sets out the proposed Development Strategy. Specifically, Policy S/DS sets out the strategy for the pattern and scale of development across Greater Cambridge to meet the overall vision and strategic priorities of the draft GCLP.
- 7.2 TREL’s appointed consultant team has carefully analysed Policy S/DS and its supporting evidence base, and raise three primary objections to the policy, all linked to the failure to identify the Site as an appropriate allocation for employment purposes, namely:
- The failure of the policy to reflect the outcomes of the published evidence base in terms of the locational requirements of general industrial uses;
  - The failure of the policy to reflect the outcomes of the published evidence in supporting the displacement of existing industrial land due to the emphasis on allocating large, complex sites; and
  - The failure to recognise role of that Grey Belt land could play in assisting to meet employment needs.
- 7.3 Each of the above are addressed in turn.

### Locational Requirements

7.4 The Government has described the need to deliver economic growth as its ‘number one mission’<sup>1</sup>. This is reflected in the NPPF which seeks to ‘build a strong, competitive economy’.

7.5 Paragraph 85 explains that:

*“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 approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”*

7.6 Furthermore, paragraph 86 explains that planning policies should:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;

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<sup>1</sup> Plan for Change, Kickstarting Economic Growth, December 2024

- set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as ... freight and logistics.

7.7 Paragraph 87 explains that planning policies “*should recognise and address the specific locational requirements of different sectors*”, including making provision for:

*“storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and*

*the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience”.*

7.8 The evidence base produced in support of the Draft GCLP sought to address these issues. In particular, the WISN 2025 identifies the typology of industrial sub-sectors that are important to the Greater Cambridge market, and considers the characteristics of each, including ‘locational requirements’.

7.9 In broad terms the WISN 2025 defines the sub-sectors of the industrial market as:

- Manufacturing/advanced manufacturing
- General industrial including wholesalers and trade counters
- Warehousing and distribution (which is split into national/regional; final mile and ultra urban)
- Mid Tech.

7.10 The WISN 2025 describes the different requirements of each sub-sector, having regard to a variety of factors including unit size, unit height, vehicles access and network access.

7.11 The document also undertook stakeholder engagement to identify key issues linked to the amount and type of industrial space, and locational priorities. In respect of general industrial space the following conclusions arose:

- demand reported for small and mid size general industrial properties from 5,000 sq.ft to 20,000 sq.ft (500 – 1,900 sq.m) including trade counter, wholesale, motor repair, construction yards and other local population serving industries who find it difficult to find space in Cambridge and serve their market.
- concerns were raised about the displacement of general industrial tenants due to current industrial land being allocated for residential. Many citing that it was unclear where existing companies would go once residential development begins, and as such one stakeholder stated “it feels like industrial is at the bottom of the pile”.

- 7.12 The WISN 2025 concludes that the primary driver for general industrial (including MOT car repair, trade park, wholesale, etc) and MidTech is the need to be within or close to Cambridge due to the proximity of its customer base. Therefore, the WISN 2025 identifies the locational requirement for general industrial and MidTech to be within or on the edge of the urban area with good access arrangements.
- 7.13 The WISN 2025 notes that land south of Coldham's Lane, originally identified for general industrial / distribution, was reported as having had the potential to fill up in six months with industrial occupiers, but is described as now being promoted by developers for life science – which has since been approved. The document explains that due to high demand for land and values associated with residential and lab space, rent prices are increasing within Greater Cambridge, putting many businesses under pressure. The WISN explains that the local customer base of general industrial occupiers means that vehicle trips would increase if they were displaced to outer locations. As such it is noteworthy that Bidwell's cited the highest industrial sector requirement being for wholesale/trade counter at 43%.
- 7.14 Overall, the WISN 2025 concludes that c30% of the residual industrial land need is for sites on the urban fringe (for general industrial and MidTech uses, as well as last mile local distribution), with the remainder (ie manufacturing and distribution) being in commutable locations or close to the strategic road network (ie A14 and M11).
- 7.15 However, the strategic employment allocations identified in Policy S/DS fail to identify sites that meet the identified locational requirements for general industrial operators, and are capable of being delivered in the short term to meet identified needs.
- 7.16 The strategic sites identified in Policy S/DS to meet industrial needs generally fall into 2 categories a) delivery as part of a large mixed use allocations; or b) sites on the A14. We deal with the former in the section below.
- 7.17 In terms of the proposed sites on the A14, these are remote from the urban boundary of Cambridge and therefore fail to meet identified locational requirements (as defined by the NPPF). This has two primary consequences, firstly it results in additional vehicular movements by car which is inconsistent with the key themes and strategic objectives of the Draft GCLP ie managing climate change, promoting active travel and reducing private car use. Secondly, it divorces operators from the local population and established customer base that they serve. The WISN explains the importance of this locational requirement for the general industrial and MidTech sectors, specifically those wholesale and trader counter operators, whose business model is based on being in close proximity to its customer base ie vehicle repairs, MoT, sales and construction related activities, etc.
- 7.18 The Site now promoted by TREL would meet these specific locational requirements, being located on the urban fringe with excellent access the local road network and close to the existing local resident population. There are few other sites that are able to meet these key locational requirements and facilitate delivery in the short term to address immediate, urgent needs.

## Displaced Uses and Site Delivery Complexity

- 7.19 As explained above, the Development Strategy delivers the majority of the employment requirements, in particular general industrial space, on sites off the A14 or as part of larger mixed use site redevelopments, such as North East Cambridge or Cambridge East.
- 7.20 In respect of the latter, it is accepted that such sites have the opportunity to deliver general industrial floorspace as part of a mixed use offer. However, sites like North East Cambridge are typically highly complex, and will require extensive masterplanning and pre-application engagement, before a planning application is advanced and development can be delivered.
- 7.21 The need for general industrial space to support the local economy is immediate and urgent, and the over reliance on large complex sites will cause further unacceptable and unnecessary adverse impacts to this sector.
- 7.22 Furthermore, allocated sites such as North East Cambridge already contain existing general industrial floorspace. Whilst the policy aspires to deliver replacement space as part of any redevelopment scheme, there will inevitably be a period of time when the existing use is displaced pending its reprovision. During this time, it is important that opportunities exist in the right location to rehouse these employment uses to ensure that they continue to meet the needs of the local resident population, but that they do so in an efficient and sustainable manner that does not result in increased vehicular trips by the private car.
- 7.23 By way of example we have examined 3 existing industrial areas that are due to be redeveloped as part of wider regeneration proposals - namely Clifton Road and Nuffield Road industrial estates, and land adjacent to the Cambridge Science Park (Milton Road). The results can be summarised as follows:
- Clifton Road
    - 48 separate industrial premises
    - Predominance of building material and tools businesses (16 units or 33%), with the next highest being motor trade (6 units or 12.5%)
    - 46% are national operators and 27% are local businesses
  - Nuffield Road
    - 19 separate industrial premises
    - Predominance of service provider businesses (6 units or 32%), with the next highest being building material and tools (5 units or 26%)
    - 63% are local businesses

- Milton Road
  - 4 separate premises
  - All occupiers within the motor trade sector

7.24 The analysis reinforces the significant number of occupiers that would be displaced by site redevelopment. There is a predominance within these estates of occupiers in the building materials and motor trade sectors that clearly need to be within the Cambridge urban area or close to it to be able to serve their customers. Furthermore, it is noteworthy the large proportion of the occupiers are local businesses who rely on the immediate customer base that they have cultivated over time and would likely struggle more than national occupiers if alternative sites were significantly removed from the urban area.

7.25 The Site now promoted by TREL provides the opportunity to meet existing and urgent needs, whilst also supporting relocated businesses, enabling them to remain close to their current resident catchment. The ability to rehouse displaced occupiers will also in turn support the swifter delivery of allocated sites.

## Grey Belt

7.26 The Government’s revisions to the NPPF in December 2024 introduced a series of planning reforms that were specifically intended to facilitate development and support economic growth.

7.27 The Government’s announcement of the revised NPPF explained the introduction of a “*new common sense approach*” to Green Belt, which requires local planning authorities to identify and prioritise development upon ‘Grey Belt’ land.

7.28 The Government emphasise that they continue to attach ‘great importance’ to the Green Belt, but that needs to be understood in the context of the newly defined ‘Grey Belt’ definition which intentionally seeks to facilitate development on poorly performing Green Belt land.

7.29 The NPPF explains that Green Belt boundaries should only be altered in exceptional circumstances evidenced and justified through the update of a Local Plan. Paragraph 147 advises that before concluding whether exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Paragraph 148 explains that as part of this process the need to promote sustainable patterns of development (having regard to paragraphs 110 and 115 of the NPPF) should be considered.

7.30 The approach adopted within the Draft GCLP is explained in the Development Strategy Topic Paper (December 2025), in particular Appendix 4. The Topic Paper explains why the GCSP does not consider the exceptional circumstances exist in this instance.

7.31 However, the evidence base and Sustainability Appraisal process nonetheless consider a series of alternative development strategy approaches to meet identified needs, including the use of Green Belt land on the edge of Cambridge. The Topic Paper explains that such

theoretical Green Belt sites could provide sustainable locations to accommodate forecast growth requirements. Key evidence findings include:

- Transport – would support a high level of active mode travel (walking and cycling) and low car mode share. New or improved connecting transport infrastructure may be needed, but given the opportunities for active travel they would likely limit the need for completely new transport infrastructure beyond that already planned;
- Green Infrastructure - may place additional recreational pressure on existing GI, but conversely may provide an opportunity for developments to cater for GI deficits in neighbouring areas
- Equalities - potential to promote equality and inclusivity by providing people with access to a wide range of services via sustainable modes of travel
- Jobs - would be successful given existing sector strengths in and close to Cambridge

7.32 Overall, the Topic Paper concludes that Green Belt sites on the edge of the urban area could perform well. However, the Topic Paper explains that the main disadvantage of such an approach would likely be the significant harm to the Green Belt. However, this conclusion pre-supposes that such sites are Green Belt, rather than Grey Belt land.

7.33 The context of the Site now promoted by TREL means that it is quite clearly Grey Belt land. The Phase 1 land is bound to the north by the emerging Police Station and the EV Charging Hub, and is bound to the south and west by The Milton Landfill site. The Council concluded that the land of the EV Charging Hub was Grey Belt, and that its redevelopment would not undermine the wider Green Belt purposes. This same conclusion is applicable to the Phase 1 land given the immediate built context on its boundaries.

7.34 Phase 2 of the Site represents previously developed land and would also satisfy the Grey Belt tests.

7.35 As a result, by definition as Grey Belt land, the Site could be allocated for development without having any undermining affect on the wider Green Belt, and without having to undertake a local plan wide review of Green Belt boundaries.

7.36 The Development Strategy Topic Paper explains that an update to the 2021 Green Belt Study will be undertaken to respond to Grey Belt policy. To assist this process in respect of the Site, TREL has commissioned a Grey Belt appraisal which is attached to these representations (**Appendix 3**).

## Summary

7.37 In summary, TREL object to the development strategy set out in Policy S/DS as it:

- Fails to reflect the locational requirements for general industrial space as set out in the evidence base
- Has an over-reliance on general industrial space being provided on large, complex mixed use sites which will not be deliverable in the short term and typically already contain industrial occupiers that will be displaced;

- Failure to recognise the Site as Grey Belt and its ability to contribute towards meeting industrial needs without resulting in any harm to the Green Belt.

## 8 Site Assessment

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- 8.1 Policy S/EOC and Policy S/RRA set out site allocations on the edge of Cambridge and the rest of the Rural Area respectively. The Site occupies a location which could arguably fall into either of these two categories.
- 8.2 For the reasons described earlier in these representations the Site has an important role to play in assisting meet the need for general industrial floorspace, including in supporting the displacement of existing floorspace lost through mixed use allocations.
- 8.3 TREL's consultant team has undertaken extensive work to analyse the appropriateness of the Site for development, having regard to all key planning and technical considerations. This work has demonstrated that there are no technical showstoppers that would prevent the Site being redeveloped.
- 8.4 The Council has previously assessed the Site through the HELAA process and reached a similar conclusion, with the majority of the HELAA criteria achieving a RAG score of 'Green' or 'Amber', including:
- Flood Risk (Amber) – whilst the Site is wholly in Flood Zone 1, small elements (up to 11%) are subject surface water flood risk which can be managed through on-site mitigation
  - Biodiversity (Amber) – no priority habitats recorded on site, albeit boundary features likely to have ecological value which can be addressed through scheme design
  - Open Space/Green Infrastructure (Green)
  - Historic Environment (Green)
  - Archaeology (Amber) – roman settlement recorded in the area
  - Accessibility (Green)
  - Site Access (Amber) – access acceptable subject to detailed design
  - Transport and Roads (Amber) – any potential impact capable of being mitigated
  - Noise, Vibration, Odour and Light Pollution – all impacts capable of being mitigated
  - AQMA (Amber) - impacts capable of being mitigated
  - Contaminated Land (Amber) – conditions required to manage potential historic contamination
  - Available (Green)
  - Achievable (Green)
- 8.5 The HELAA exercise confirms agreement that none of the above criteria are considered obstacles to the realisation of development on the Site.
- 8.6 The only HELAA criteria where the Site scored 'Red' relates to Landscape. The HELAA concludes as follows:

*“Development throughout this site would have a significant adverse impact to the wide and local landscape character and views. It would be an encroachment into the landscape, permanent, remove existing open agricultural fields and an urbanisation of the rural countryside. Even with a reduction in commercial floor space and residential units with landscape mitigation measures the harm would still be significant and unacceptable”.*

- 8.7 In light of the judgement reached by the Council, TREL has commissioned LDA Design to prepare a Landscape and Visual Appraisal – a copy of which accompanies these representations (**Appendix 4**).
- 8.8 The Appraisal focuses on Phase 1, but also provides an analysis of the wider spatial context and outlines how this strategic context informs considerations for the Site as a whole.
- 8.9 To aid the identification of receptors likely to be most affected by development on the Site and those which are unlikely to have visibility, a Zone of Theoretical Visibility (“ZTV”) study was generated, based on development height parameters of 10m and 12m within the western and eastern parts of the Phase 1 land respectively. The analysis was carried out using a topographic model including settlements and woodlands as visual barriers in order to provide a more realistic indication of potential visibility (i.e. LiDAR).
- 8.10 The ZTV shows theoretical visibility of the proposed development across a relatively narrow corridor of land to the north up to Landbeach. An area of theoretical visibility is also indicated to land south-east of Waterbeach. Visibility from land to the north-west, west, south and west is screened by the topography of the made ground in Milton landfill, as well as vegetation that encloses the site, including along the western edge of Milton and the A10.
- 8.11 The Appraisal explains that following a site survey, it was found that views towards Phase 1 are very limited and extremely localised. These are short distance filtered and direct views into the Site within approximately 50m to the east, from the A10. Visibility from the A10 ceases beyond Butt Lane, to the north where vegetation associated with Milton Park and Ride and Butt Lane screen views. There is intervisibility within fields north of Butt Lane but visibility towards the proposed development from Landbeach is limited and heavily filtered by vegetation along Butt Lane and within/adjacent to Milton Road Park and Ride. This will only be further screened by consented development immediately north of Phase 1 associated with Police Station and EV charging hub.
- 8.12 In summary the Appraisal’s findings are as follows:
- **Landscape Character:** The Phase 1 land forms part of LCA 2B Cottenham Fen Edge Claylands. To the south of the character area, it is affected by urban influences, which is particularly apparent within and surrounding the Site associated with Milton Park & Ride, construction of Police Station and the A10. The Milton landfill to the south and west of is incongruous to the character area with land rising by up to c. 15m above average ground levels in the otherwise flat and low-lying landscape. GCSP judges the sensitivity of the land and surrounding study area as being Medium-Low to development, acknowledging that the woodland blocks west of Milton (i.e. surrounding the Site) would mitigate potential development in this area, and that there could be opportunities for taller development parameters. It is considered that the landscape value of the land is of Community Value. It is assessed that development would not undermine key

characteristics of the landscape, and with appropriate landscape-led design, can help enhance or deliver the green infrastructure initiatives and landscape guidelines GCSP aspire for. The Appraisal comments that the same principle and conclusions would apply to Phase 2.

- **Visual:** Landform and vegetation to the immediate south and west help to contain views of potential development in these directions. The substantial tree belt along the western edge of the Milton, adjacent to the A10, also helps to contain views to the west. Consequently, the only direction where there would be potential visibility of the proposals is to the north. However, this is fragmented by existing woodland blocks/tree planting along Butt Lane, within Milton Park and Ride, as well as the construction of the Police Station, immediately north of the Site. Due to a lack of PRow network in this area, visual receptors potentially affected by the proposed development with the greatest effect on views would be limited to users of the local road network (i.e. Butt Lane and A10), users of Milton Park and Ride and users of bridge over A10 linking Milton with Park & Ride. Distant and barely perceptible changes to views would occur to residents associated with Landbeach, c. 1.4km to the north-east. All other visual receptors in the study area would receive negligible effects. Consequently, the effect on visual receptors is extremely localised being within close proximity to the boundary to north (up to Butt Lane) and east. Future delivery of Phase 2 would not result with significant changes to the conclusions of the Appraisal. Given the flat and low-lying nature of the landscape to the north, more distant views to Phase 2 would be perceived as a replacement of views towards Milton Park and Ride, Police Station and Phase 1, rather than as an advancement of development into the landscape. Enhancement of woodland and tree planting along Butt Lane will also help to filter and soften views to built form, stitching into the wooded setting found west of Milton.
- The Appraisal also identifies opportunities to be considered at the next stage of design development, namely:
  - Setting back development from the A10 so that built form is not too prominent in views from A10. As land is lower lying to the west of the Site, set back can be used for sustainable drainage solutions, as well as creating an attractive frontage to the Site.
  - Retain and enhance existing field hedgerows and trees within the layout.
  - Creation of tree lined streets in a geometric pattern reflecting local field patterns
  - Increasing tree canopy cover by creating a grid of green infrastructure connecting the existing woodland blocks around the Site, as well as helping to improve urban greening.
  - Within the more visually sheltered west of the site, larger footprint buildings are to be located whilst smaller footprint buildings to be located in the more visible east.
  - Limit height of proposed development up to 12m.
  - Where possible and appropriate, integrate and expand green infrastructure proposals/strategies within adjacent consented development into Site layout to create a cohesive masterplan for Milton Park.

- 8.13 In summary, the Site has been tested through the HELAA process, and save for landscape, it is agreed that there are no technical matters that would prevent redevelopment.
- 8.14 A Landscape and Visual Appraisal has been submitted alongside these representations, which demonstrates that when assessing the specific context of the Site and having regard to the development proposed, the visual effects of the development are limited and will not result in significant adverse effects.
- 8.15 TREL would be happy to meet with officers to discuss this technical evidence in more detail if useful.
- 8.16 Overall, in light of the absence of any site constraints and the ability of the Site to assist meet the specific employment growth requirements forecast for Greater Cambridge, the site should be allocated under Policy S/EOC or S/RRA.

## 9 Summary

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- 9.1 TREL consider that the Site offers a unique opportunity to assist and contribute to meeting the employment growth requirements of Greater Cambridge in a sustainable manner. In particular, the Site:
- is well located on the urban fringe meeting the specific locational requirements of the trade counter/wholesale and MidTech sub-sector of the industrial land market;
  - offers immediate access on the local road network;
  - does not require significant infrastructure upgrades;
  - represents Grey Belt land and hence will have no adverse impact on the wider Green Belt;
  - is deliverable immediately to assist meet the urgent needs of the industrial land sector, particularly for uses already/due to be displaced to enable mixed use development to be delivered on large allocated sites.
- 9.2 TREL object to the exclusion of the Site as an allocation to assist meet the significant employment growth requirements across Greater Cambridge, particularly due to the specific site characteristics which respond positively to the aspirations of the GCLP and its supporting evidence base.
- 9.3 In this context, these representations set out objections to the following:
- Employment need (Policy S/JH)
  - Development Strategy (Policy S/DS)
  - Site assessment and allocations (Policies S/EOC and S/RRA)