

Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
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Date: 30 January 2026

Our ref: 63559/01/SB/CGJ/NP/JHy/40615364v1

Dear Sir/Madam

Greater Cambridge Local Plan: Preferred Options (Regulation 18) Representation on behalf of Lolworth Developments Limited

We write on behalf of our client, Lolworth Developments Limited ('LDL'), a subsidiary of Salhia Real Estate, to make a representation to the Greater Cambridge Local Plan (Regulation 18) ('GCLP') consultation, which runs until 30 January 2026.

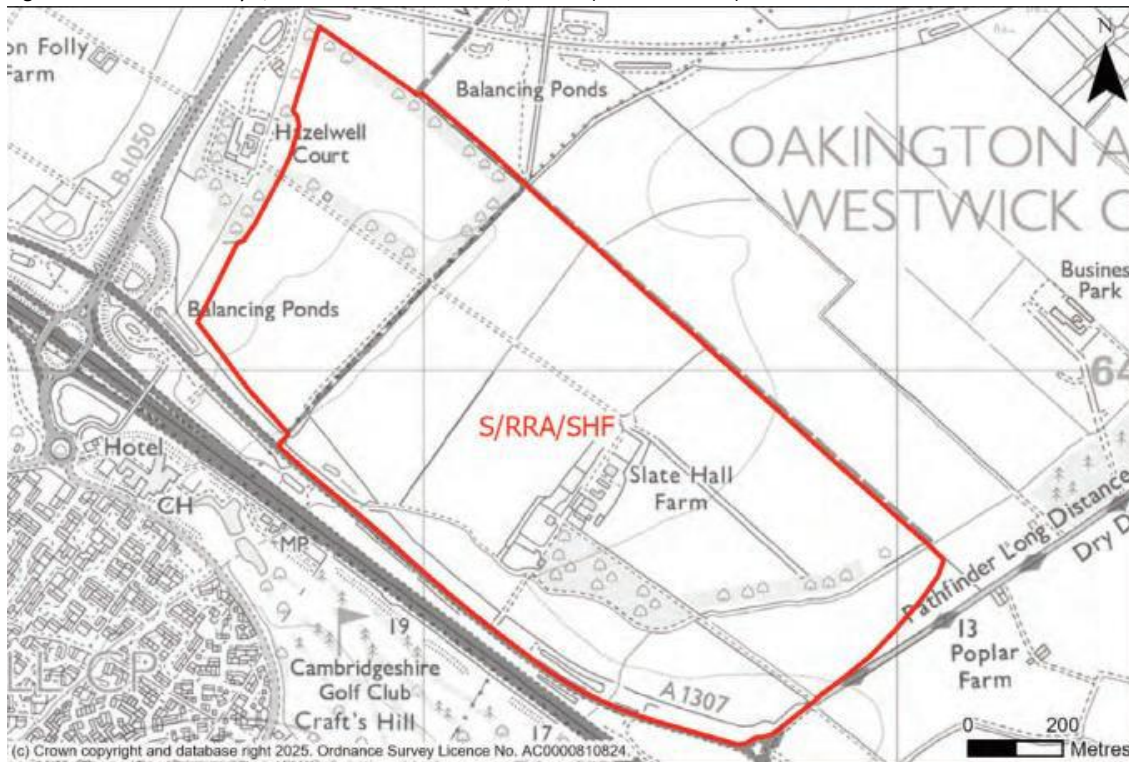
We write further to our representation to the previous Regulation 18 version of the Local Plan (13 December 2021) and our subsequent GCLP submissions, including our Call for Sites response submission (7 March 2025).

Cambridge 25 and Policy S/SHF site allocation

LDL is actively promoting the Cambridge 25 site on the north side of the improved Junction 25 of the A14, opposite Bar Hill, for a sustainable employment park development with business and logistics capability and capacity.

The Cambridge 25 site forms the primary part of the proposed site allocation '*Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)*' in the draft GCLP for a major employment site. The Site Plan for the allocation is shown at Figure 1.

Figure 1 Site Plan of Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



Source: Draft GCLP Figure 109

Structure of Representation

This representation comments on the nine policies with supporting information contained in a number of separate appendices, as set out below. As requested, we have also submitted each policy response separately, via the online consultation system.

- Policy S/JH: New jobs and homes
- Policy S/DS: Development strategy, and accompanying:
 - a. Market Demand Assessment, Savills (January 2026) - **Appendix 1**
- Policy S/SHF: Land north of A1307 Bar Hill (Slate Hall Farm). The Annex (**Annex 1**) at the end of this letter sets out our recommended changes to Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm), and accompanying:
 - a. Site S/SHF Site Allocation: Indicative Masterplan (Chetwoods, January 2026) - **Appendix 2**
 - b. Slate Hall Farm Building Heritage Appraisal Statement (RPS, January 2026) - **Appendix 3**
- Policy J/NE: New Employment Development Proposals, and accompanying:
 - a. Market Demand Assessment, Savills (January 2026) - **Appendix 1**
- Policy CC/NZ: Net zero carbon new buildings

- Policy BG/TC: Improving tree canopy and the tree population
- Policy GP/LC: Protection and enhancement of landscape character
- Policy J/AW: Affordable workspace and creative industries
- Policy I/SD: Servicing and last-mile deliveries

Policy S/JH: New jobs and homes

LDL welcomes the updated draft Policy S/JH: New jobs and homes that (inter alia) sets a target of 73,300 additional jobs over the Local Plan period from 2024 to 2045.

The Greater Cambridge Employment and Housing Evidence Update 2025 ('GCEHEU 2025'), which has informed the emerging policy, takes into consideration the latest market signals and applies the necessary adjustments to inform the employment policy requirements. According to this, there is a need for 317,000 sq.m of industrial and warehousing space by 2045 (alongside a need for over 302,000 sq.m of office and 600,000 sq.m of R&D space). This figure updates the underestimates of floorspace requirements set out in the Council's earlier evidence base work (i.e. which only identified up to 60,000 sq.m of industrial and warehousing need). The revised figures comprise a far more reflective estimate of the market activity across the area.

The GCLP (paragraph 2.11) highlights that there is also *"a higher growth forecast, placing greater weight on rapid growth in the recent past, particularly in key sectors, and that it is recommended providing flexibility in employment land in case the market delivers more jobs than anticipated"* [Lichfields emphasis]. Therefore, the Council recognises the potential for further employment growth over and above the identified need position across the plan period.

On a similar basis, the GCEHEU 2025 discusses suppressed demand matters and suggests that, if an 8% availability rate was assumed, there would be an even higher need for industrial and distribution floorspace of 360,000 sq.m (GCEHEU, paragraph 5.26).

Whilst the GCLP is being prepared under the current local plan system and must be consistent with the present National Planning Policy Framework ('NPPF', December 2024), the direction of travel in national policy is also relevant. This is particularly the case when the Government has indicated that *"Development plan policies which are inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework..."* (draft NPPF December 2025 Annex A, paragraph 2). It will seek to publish the NPPF on a timescale that is expected to precede the timing of the Reg19 GCLP.

Consultation draft NPPF Policy E1 highlights the importance of a clear economic vision aligned with the strategic and local economic development strategies to support business investment and employment locally. Moreover, the new draft NPPF gives significant emphasis to 'market signals' in both plan-making (Policy E1.2) and decision-making (Policy E2.2a) policies of Chapter 7 'Building a strong, effective economy'. This represents a clear recognition by the Government of the importance of responding to commercial property market activity in plan-making.

Synthesising the above, and also considering that the Council's evidence focuses solely on 'indigenous' needs arising within Greater Cambridge – and is neutral regarding the wider FEMA strategic

requirements - there is therefore a need to treat these economic need figures as the minimum employment space requirement and allow for appropriate flexibility and a level of choice for different sectors, as well as to enable the higher growth scenario that reflects recent past trends.

Policy Recommendation

On this basis, LDL recommends that the supporting text (para 2.12) to Policy S/JH is amended as below

Building on the jobs forecasts, the EHEU 2025 identifies employment land needs for the 2024-45 plan period as follows, drawing also on market signals and stakeholder engagement, and incorporating a flexibility margin and allowance for vacant floorspace:

- 302,600 sqm offices and 600,000 sqm of Research and Development (R&D) space
- 317,000 sqm of industrial / warehousing (use classes B2/B8).

These employment land figures will be treated as the minimum employment space requirements and to allow for appropriate flexibility and a level of choice for different sectors.

Policy S/DS: Development strategy

Policy S/DS: Development strategy sets out the proposed spatial distribution of jobs (and housing) growth across the area for the period to 2045 and beyond. In terms of the pattern of employment growth, there is a significant focus on the R&D sector, reflective of Greater Cambridge's economy.

Provision Quantum

Nonetheless, a total of 370,000 sq.m of industrial and warehousing space is proposed to be allocated (Policy S/DS 2b.i, 2c.ii, 2e.i & ii) to support the local economy and to accommodate the significant demand for such space as indicated by the Council's evidence.

The GCLP aims to provide for a higher economic need figure (against the 317,000 sq.m minimum requirement); however, this is not considered sufficient 'headroom' to deal with anything more than the identified indigenous needs which, as indicated in the Council's evidence, totals 360,000 sq.m once the recent trends are considered.

Most of this allocation provision (i.e., 330,000 sq.m or 89%) is proposed in the 'Rest of the rural area' (Policy S/DS 1e, 2e(i),(ii)), with the remaining 40,000 sq.m or 11% industrial uses equally divided (20,000 sq.m each) between the edge of Cambridge (Policy S/DS 1b,2b(i)) and the expanded Cambourne (Policy S/DS 1c,2c(ii)).

Most of this industrial and warehousing supply relates to the Slate Hall Farm (the proposed site allocation) at Junction 25, A14 (for which LDL is the main promoter and stakeholder), where the new allocation for approximately 240,000 sq.m employment floorspace for industrial and warehousing uses (Policy S/SHF) accounts for some 65 % of the total allocation provision.

Policy S/DS2e(ii) states that: "a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: including approximately 240,000m² employment floorspace for

industrial and warehousing uses, with a mix of small-medium units to support the growth of a wide range of different businesses”.

This rightly highlights that the Council recognises that the draft site allocation should have a key role in meeting the future industrial and warehousing growth needs of Greater Cambridge over the next 20 years. It is also important to highlight that the size of the allocation site is capable of providing flexibility and choice to the market, in turn significantly enhancing availability in the Greater Cambridge which has been a very constrained market for a long period.

LDL is actively liaising with Council Officers to bring forward logistics and industrial development to significantly enhance the industrial and warehousing supply to meet the identified need.

Scale and Flexibility

However, LDL also considers that some parts of Policy S/DS2e(ii) require amendment to ensure alignment with national policy (NPPF 2024), as well as to provide the necessary flexibility to the market, on the basis that:

- 1 Current NPPF (2024) paragraph 87b highlights the importance of planning policies to address the specific locational requirements of *“storage and distribution operations at a variety of scales and in suitably accessible locations.”* [Lichfields emphasis]. The national policy gives weight to the sector’s specific requirements and highlights the importance of providing a wide range of scales, in recognition of the sector’s particular characteristics.
- 2 The draft NPPF (December 2025) Policy E1.2 goes further and states clearly that *“development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage).”* [Lichfields emphasis].
- 3 Moreover, draft NPPF Policy E1.1.c.ii states that development plans should *“c. Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period, paying particular regard to...making provision for:.ii. 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 (including ‘last mile’ deliveries), transport innovation and decarbonisation;..”* [Lichfields emphasis].
- 4 The Council’s evidence, namely the Greater Cambridge Warehouse and Industrial Space Needs Report 2025 (‘GCW&ISNR’, paragraphs 5.7, 5.14, 5.18, 6.19, 6.24, 7.21), highlights that there is demand for larger-scale units in Greater Cambridge and gives particular emphasis to the A14 corridor. On this basis, the market signals demonstrate clearly the demand for a variety of scales of industrial and particularly warehousing units across Greater Cambridge generally and the A14 corridor in particular.
- 5 Furthermore, the latest market evidence from Savills (**Appendix 1**) highlights (in paragraphs 5.3.3 to 5.3.5) that there is no direct correlation between the size of units and the type of occupiers or the market being served. A fixed threshold does not determine the type of occupier or the market being served.

- 6 In contrast, there are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units of a significant size. For example (based on data extracted by CoStar in November 2025 as combined with data presented in **Appendix 1**) the following companies already occupy large buildings in Greater Cambridge:
- a. Hain Daniels (also known as Hain Celestial) occupies 290,000 sqft manufacturing and food processing facility in Histon. This is an US food producer with regional facilities in various locations in the UK, including Henley-upon-Thames, Leeds and the unit in Greater Cambridge, among others. As described in **Appendix 1** (Table 5.1), the site was originally occupied by the Chivers family- i.e., the largest producer in the country (, who began jam production in the 1870s). The operations were replaced by Premier Foods, who bought redeveloped the facilities, and then was purchased by Hain Daniels, who continue to produce jam from the site, among other products.
 - b. Huntsman Advanced Materials, who occupy 250,000+ sqft in Duxford, is a leading global (US interests) material solutions provider. The Duxford facility's key products and services include epoxy adhesives, methacrylate adhesives, aerospace systems, polyol systems, isocyanate adhesives, epoxy filters distributed across Europe, Africa and Middle East. There are two more facilities in the UK, in Wilton, Redcar and King's Lynn.
 - c. Hexcel is a leading producer of advanced structural materials, with a significant presence in the UK, particularly at its Duxford site, where they occupy a large unit of over 385,000 sqft split in various subunits. Founded in 1934, Hexcel specialises in carbon fibre reinforcements and resin systems and is recognised as the world leader in honeycomb manufacturing for the commercial aerospace industry. The Duxford facility manufactures a wide range of products, including prepregs and adhesives, for applications in aerospace, defence, and automotive sectors.
 - d. Fred Smart Logistics (**Appendix 1**, Table 5.1) currently occupies a 120,000 sqft in Papworth Everard. The company is part of the Frederic Smart & Son Ltd which started as an agricultural products trader locally. The company initially established its presence in Whittlesford in 1919 when it bought a mill and since then it has continued to expand its operations.
 - e. Cambridge University Press & Assessment (**Appendix 1**, Table 5.1) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use, with about 5% of the floorspace for offices. In particular, the warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.
- 7 A restriction of larger industrial units is unique across the markets of other comparable locations – i.e., those with similar economic and market characteristics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich (**Appendix 1**, Section 3.6, pg. 21-22). In particular, an analysis of the industrial and warehousing leasing activity across various unit scales in those areas demonstrates that all other locations have significantly higher activity in units above 100,000 sqft, with Oxford recording the highest (66% of leasing activity relating to units above 100,000 sqft since 2018). The equivalent in Greater Cambridge is just 11% (the lowest across the sample of other locations) relating to a single transaction in an older warehouse building, namely the CDC Building, by retailer White Stores. This highlights that similar markets need this segment of industrial provision to

function appropriately as well as indirectly implies that there is a substantial market gap in the stock offer of Greater Cambridge.

Over the last eight years and since the South Cambridgeshire LP Policy E/11 adoption, there have been existing businesses, namely Marshalls and DHL (**Appendix 1**, paragraphs 5.1.2, 5.4.6 to 5.4.8) that have had to relocate away from Greater Cambridge due to a lack of availability of premises of sufficient scale.

Extrapolating these trends, the latent demand for larger-scale units will continue increasing, and the lack of such provision will displace investment further away and jeopardise the retention of existing businesses if they are unable to accommodate their growth plans within Greater Cambridge.

In summary, the fact that national and international providers already have a presence in the area should be taken into consideration as part of the market dynamics locally, alongside the fact that there are local businesses that cannot accommodate their growth plans locally and are forced to move out of the area.

Synthesising this evidence, we consider that the justification for this policy, seeking to limit commercial uses to small- and medium-sized units, is plainly not justifiable, nor aligned with national policy. To the contrary, it will actively constrain local growth, contrary to national policy. The Jobs Topic Paper (paragraph 3.42) implies that only regional and national distributors have large size requirements above 100,000 sqft, and it is a policy choice to “*continue the approach included in the adopted South Cambridgeshire Local Plan 2018*”. This conflicts with the NPPF and contradicts the market signals and the market demand reported in the Council’s own evidence and that included at Appendix 1. If this policy were to remain unchanged, it will likely distort the functioning of the market, by limiting flexibility and choice to meet business needs on the principal and largest employment allocation site in the GCLP.

Policy Recommendation

On this basis, LDL recommends that Policy S/DS2e(i) is amended as below:

“e. In the Rest of the Rural Area:

*i. Slate Hall Farm, Junction 25, A14 – a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: including approximately 240,000m² employment floorspace for industrial and warehousing uses, with **an appropriate mix of small-medium** unit sizes to support the growth of a wide range of different businesses **and respond to the changing needs of the industrial and warehousing sector in Greater Cambridge. ..”***

Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm) Site Allocation

LDL welcomes draft Policy S/SHF and, as the primary landowner/stakeholder of the proposed site allocation, will liaise with the Council to successfully implement the allocation and contribute significantly to the economic vision and growth priorities of the GCLP.

The Site Allocation Topic Paper ('SATP') finds that the site offers "...the best location in terms of meeting key locational preferences..." identified in the GCW&ISNR and goes on to explain the reasons why (para 7.15).

The SATP also identifies that the site allocation reflects the agglomeration of two site promotions (para 7.12). The other promoter is the owner of the Slate Hall Farm existing employment area, indicatively identified as the 'Employment Led Development' area on GCLP Figure 108. LDL is capable of both bringing forward its land for development independently and to incorporate and facilitate the bringing forward and accessing the smaller part of the allocation site. LDL is actively liaising with this fellow site promoter on bringing forward their development land as part of a co-ordinated and comprehensive phased delivery of the whole allocation site, as demonstrated by the S/SHF Site Allocation: Indicative Masterplan (at **Appendix 2**).

The 'Vision and identity' section (points 1 to 3) sets out the objectives of the allocation. We concur with point 1 that, aligned with the NPPF and its proposed revisions, "*It will provide a range of logistics and industrial uses that can support the long-term needs of the Greater Cambridge population and economy*"

Development Capacity

The 'Uses' section (point 4) sets out the proposed land use provision and approximate quantum of the development in the allocation. It identifies that the site allocation has "...capacity for approximately 220,000 sq.m GIA of commercial uses providing a flexible range of small-to-medium scale units...". The indicative capacity has been informed by various parts of the GCLP Evidence base.

Policy S/DS (e) states: "*Slate Hall Farm, Junction 25, A14 – a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: including approximately 240,000m² employment floorspace for industrial and warehousing uses, with a mix of small-medium units to support the growth of a wide range of different businesses;*"

The Site Allocations Topic Paper (SATP, para 7.12) states that - "*Consideration of site capacity: The site has been proposed by two site promoters. The larger proportion existing of the whole site allocation with the exception of Slate Hall Farm and the existing employment area proposed 240,000 sqm of employment floorspace. The existing employment site has separately been nominated through the call for sites process and these two sites have been brought together. This will enable the site to be planned for and delivered holistically.*"

The SATP (para 7.13) then explains that - "*The eastern part of the site is identified for green infrastructure, water management and biodiversity improvement. The developable area of the site is around 70 hectares, but also includes hedgerows and other features including a bridleway that need to be incorporated into green corridors and other mitigation. Applying a plot ratio of 0.3, would deliver a capacity of approximately 220,000 square metres which would need to be refined through a landscape lead masterplanning process.*"

GCSP have, in estimating a 70 ha developable area and 0.3 plot ratio, adopted a cautious approach to confidently identify a minimum capacity that this allocation site might bring forward, to be considered

against the employment need requirement. We consider that approach is an appropriate starting point for a local plan allocation but, as the SATP recognises, this estimate “...*would need to be refined through a landscape led master-planning process.*” LDL have adopted a landscape-led master-planning process for its site and the whole S/SHF site allocation. This has informed the emerging site masterplan, which was used to inform the 240,000 sq.m provision figure in the SATP (derived from the LDL team and the SHF promoters).

We therefore consider it appropriate to align the Development strategy and site allocation capacity estimates, by using the former (240,000 sq.m), given the previous LDL GCLP submission / evidence on development capacity and clarifying in policy S/SHF that the development quantum is to be established through a landscape-led masterplan process.

Unit Sizes

LDL’s concern relates to the fact that, similar to Policy S/DS 2e(i), the second sentence of Policy S/SHF4, in stating “*small-to-medium scale units*”, and the corresponding para 3.5.5 of the Supporting Information, are unnecessarily and overly prescriptive in relation to the type and size of units. This contradicts both the NPPF 2024 (paragraph 87b) and the draft NPPF (Policies E1.1.c.ii and E1.2) as well as the property market needs evidenced in the area (relating to both the Council’s evidence, namely GCW&ISNR, and the recent market report attached in this representation (**Appendix 1**)). This (at paragraphs 5.3.3 to 5.3.5) demonstrates that, in commercial property market terms, the size of any unit does not directly relate to the market it serves - i.e., local or regional needs.

In particular, as noted above, it is evident that national and international providers already have a presence in the area as well as there are local businesses that were forced to move out of the area as their growth plans and requirements for larger premises were not accommodated. These points are discussed below:

- 1 The latest market evidence, as presented in **Appendix 1** (paragraphs 5.3.3 to 5.3.5), highlights that there is no direct correlation between the size of units and the type of occupiers or the market being served. A fixed threshold does not determine the type of occupier or the market being served.
- 2 There are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units above 100,000 sqft. In particular:
 - a. Hain Daniels (also known as Hain Celestial) occupies 290,000 sqft manufacturing and food processing facility in Histon. This is an US food producer with regional facilities in various locations in the UK, including Henley-upon-Thames, Leeds and the unit in Great Cambridge, among others. As described in **Appendix 1** (Table 5.1), the site was originally occupied by the Chivers family - i.e., the largest producer in the country (who began jam production in the 1870s). The operations were replaced by Premier Foods, who bought redeveloped the facilities, and then was purchased by Hain Daniels, who continue to produce jam from the site, among other products.
 - b. Huntsman Advanced Materials, who occupy 250,000+ sqft in Duxford is a leading global (USA interests) material solutions provider. The Duxford facility's key products and services include epoxy adhesives, methacrylate adhesives, aerospace systems, polyol systems, isocyanate

adhesives, epoxy filters distributed across Europe, Africa and Middle East. There are two more facilities in the UK, in Wilton, Redcar and King's Lynn.

- c. Hexcel is a leading producer of advanced structural materials, with a significant presence in the UK, particularly at its Duxford site, where they occupy a large unit of over 385,000 sqft split in various subunits. Founded in 1934, Hexcel specialises in carbon fibre reinforcements and resin systems, and is recognised as the world leader in honeycomb manufacturing for the commercial aerospace industry. The Duxford facility manufactures a wide range of products, including prepregs and adhesives, for applications in aerospace, defence, and automotive sectors.
 - d. Fred Smart Logistics (**Appendix 1**, Table 5.1) currently occupies a 120,000 sqft in Papworth Everard. The company is part of the Frederic Smart & Son Ltd which started as an agricultural products trader locally. The company initially established its presence in Whittlesford in 1919 when it bought a mill and since then it has continued to expand its operations.
 - e. Cambridge University Press & Assessment (**Appendix 1**, Table 5.1) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use, with about 5% of the floorspace for offices. In particular, the warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.
- 3 In addition, it is important to highlight that compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich (**Appendix 1**, Section 3.6, pg. 21-22), the presence of larger-scale industrial units is significantly higher, highlighting that their markets need this segment to function appropriately as well as indirectly implying that there is a market's gap in the stock offer of Greater Cambridge.
- 4 As a result, the last eight years policy restriction, since the adoption of South Cambridgeshire LP Policy E/11 has already forced existing businesses away from Greater Cambridge due to a lack of availability of premises of sufficient scale. Examples include Marshalls and DHL (**Appendix 1**, paragraphs 5.1.2, 5.4.6 to 5.4.8).

Extrapolating these trends, the latent demand for larger-scale units will continue increasing, and the lack of such provision will displace investment further away and jeopardise the retention of existing businesses if they are unable to accommodate their growth plans within Greater Cambridge.

Furthermore, the Council's evidence, namely the GCW&ISN 2025, cites the 'Understanding demand for B8 premises across Greater Cambridge', authored by WSP in 2021 on behalf of Greater Cambridge Partnership and the Greater Cambridge Shared Planning Service, which presents the findings of the engagement with the industry (19 interviews with stakeholders), and indicates that there is latent demand for larger scale units in the area with emphasis on the need for medium- to large-scale B8 units.

On a similar basis, the justification (at paragraph 3.5.5 of the supporting information) should also be amended to delete size-specific references and also the threshold of "less than 9,300 square metres (100,000 square feet)."

Employment Use Mix

We consider that the major employment park site allocation should not be restricted to B2/B8 uses only, given it is also suitable for E(g)(i) (Offices), E(g)(ii) (Research & Development) and E(g)(iii) (Light Industrial) employment uses. However, we concur that, as the site's strategic location and size makes it particularly suitable to meet the very considerable need for B2 and B8 employment uses, these should be the priority. However, there is merit in accommodating other complementary employment uses, both as part of the Employment Park mix and to accommodate smaller buildings as part of the masterplanning and design process, provided these collectively comprise a small proportion of the employment park development.

On this basis, and similarly to LDL's representation on Policy S/DS: Development strategy, we would also seek an amendment of Policy S/SHF4, as provided in **Annex 1** (further below).

Policy Requirements

Draft policy S/SHF, first explains the GCLP vision, identity and uses proposed within the allocation. It then sets out a series of policy requirements. We consider all of these considerations to be appropriate but not the use of the word "must" in the preamble, without qualification, as this implies that all requirements should be treated as 'policy absolutes'.

It is appropriate that applications are required to address each topic, but there may be good planning reasons for meeting a policy requirement differently, or other reasons to justifying departing from a particular criterion. There is also a need to assess whether harm arises from such an assessment and to consider that against the planning benefits when undertaking a 'planning balance' exercise.

We consider it is appropriate to address this point by amending and adding to the preamble as follows: "~~...must~~ *should* do the following, *unless justified otherwise*".

Context

We concur with paras 5–9, save for para 7 on heritage, because the Slate Hall Farm Building Heritage Appraisal Statement (RPS, January 2026) (at **Appendix 3**) has assessed that the Slate Hall Farm building and adjudged this to not be Non-Designated Heritage Asset.

We therefore consider para 7 should be deleted:

"7 Mitigate the impact of the development on Slate Hall Farm, a potential nondesignated heritage asset, and its setting"

Figures 106 and 108

We consider it necessary to correct or otherwise amend these two figures:

Figure 106 (Strategic Vision Area: for the Rest of Rural Area) inaccurately depicts the extent of Green Belt which runs to the boundary of the A14 and Dry Drayton Road; it does not include part of the Slate Hall Farm site allocation. The correct boundary is shown on the GCLP policies map ([here](#)) and should be amended accordingly.

Figure 108 (Spatial Framework for Policy S/SHF), whilst indicative, and should be identified as such, would benefit from greater accuracy and amendment to:

- revise the diagrammatic Retained Slate Hall Farm Non-Development Area to more closely reflect the actual location of existing development and site ownerships;
- revise the diagrammatic employment parcels to more closely reflect the location of proposed development; and
- amend the Green Infrastructure shown to more closely reflect the site’s existing vegetation cover and improved landscape strategy.

We also consider that, having identified the suitability of the principal highway access on to the A1307, it ought to indicatively reflect the two points of vehicular access that LDL propose on to the A1307, as identified on S/SHF Site Allocation: Indicative Masterplan (at **Appendix 2**).

Policy J/NE: New employment development proposals

Policy J/NE: New employment developments guides proposals for employment development across the area. Aligned with LDL’s representations on Policies S/JH, S/DS and S/SHF, Policy J/NE7 and the supporting information in paragraph 8.19 are considered ‘too prescriptive’ in terms of national policy (NPPF 2024, paragraph 87b and draft NPPF 2025, E1.1.c.ii and E1.2) and, more importantly, they misinterpret the function and dynamics of the logistics industry.

As phrased, the draft policy limits any warehousing and distribution development above 9,300 sq.m on the basis that this size threshold differentiates between local and regional/national operations. For the reasons discussed below, this is not considered to be an accurate reflection of market realities in Greater Cambridge (or indeed anywhere else), it would potentially result in a distortion to the functioning of the market and is not consistent with the existing and draft NPPF:

- 1 There is no evidence that large-scale warehousing units above 9,300 sq.m (100,000 sqft) are solely accommodating national or regional needs. In contrast, there are occupiers serving Greater Cambridge that have such requirements, but they are not reflected in either the net absorption data or in the completions rates economic growth scenario, given that existing policy has not allowed for larger units to be developed in the last 15-20 years. The market signals, reflecting enquiries and activity (**Appendix 1**, Table 5.2), as well as stakeholder engagement (through the Council’s evidence, namely the GCW&ISN 2025 and the Understanding demand for B8 premises across Greater Cambridge 2021, which is cited within the Council’s evidence) highlights the latent demand for larger-scale units in the area. This is also recognised by the Council in the Jobs Topic Paper paragraph 3.42 (see pg.5).
- 2 In addition, the latest market evidence as presented in **Appendix 1** (paragraphs 5.3.3 to 5.3.5) highlights that there is no direct correlation between the size of units and the type of occupiers or the market being served. A fixed threshold does not determine the type of occupier or the market being served
- 3 More importantly, there are already a number of both local and national/international companies operating in Greater Cambridge that occupy industrial units above 100,000 sqft. In particular:

- a. Hain Daniels (also known as Hain Celestial) occupies 290,000 sqft manufacturing and food processing facility in Histon. This is an US food producer with regional facilities in various locations in the UK, including Henley-upon-Thames, Leeds and the unit in Greater Cambridge, among others. As described in **Appendix 1** (Table 5.1), the site was originally occupied by the Chivers family - i.e., the largest producer in the country (who began jam production in the 1870s). The operations were replaced by Premier Foods, who bought and redeveloped the facilities, and then was purchased by Hain Daniels, who continue to produce jam from the site, among other products.
 - b. Huntsman Advanced Materials, who occupy 250,000+ sqft in Duxford, is a leading global (USA interests) material solutions provider. The Duxford facility's key products and services include epoxy adhesives, methacrylate adhesives, aerospace systems, polyol systems, isocyanate adhesives, epoxy filters distributed across Europe, Africa and Middle East. There are two more facilities in the UK, in Wilton, Redcar and King's Lynn.
 - c. Hexcel is a leading producer of advanced structural materials, with a significant presence in the UK, particularly at its Duxford site, where they occupy a large unit of over 385,000 sqft split in various subunits. Founded in 1934, Hexcel specialises in carbon fibre reinforcements and resin systems, and is recognised as the world leader in honeycomb manufacturing for the commercial aerospace industry. The Duxford facility manufactures a wide range of products, including prepregs and adhesives, for applications in aerospace, defence, and automotive sectors.
 - d. Fred Smart Logistics (**Appendix 1**, Table 5.1) currently occupies a 120,000 sqft in Papworth Everard. The company is part of the Frederic Smart & Son Ltd which started as an agricultural products trader locally. The company initially established its presence in Whittlesford in 1919 when it bought a mill and since then it has continued to expand its operations.
 - e. Cambridge University Press & Assessment (**Appendix 1**, Table 5.1) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use, with about 5% of the floorspace for offices. In particular, the warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.
- 4 In addition, it is important to highlight that compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich (**Appendix 1**, Section 3.6, pg. 21-22), the presence of larger-scale of industrial units is significantly higher. This highlights that markets need this segment to function appropriately, and emphasises Greater Cambridge market's gap in the stock offer (particularly in the context of existing policy which has effectively stymied the development of larger units).
 - 5 As a result of the policy restriction for the last eight years - since the adoption of South Cambridgeshire LP Policy E/11- there have already been two businesses - namely Marshalls and DHL (**Appendix 1**, paragraphs 5.4.6 to 5.4.8) - that have had to relocate from Greater Cambridge due to a lack of availability of premises of sufficient scale.
 - 6 Continuing to restrict larger units will constrain economic growth by increasing the latent demand for such units or result in businesses relocating and employment being lost locally.

- 7 A policy choice to limit provision for regional (and national) occupiers is not consistent with the NPPF. In particular, NPPF paragraphs 86c, 86e and 87b require the necessary levels of flexibility in accommodating specific modern economy - including (inter alia) freight and logistics - needs, recognising the evolving economic circumstances as well as the specific locational requirements for the sector “*at a variety of scales*”. Moreover, the proposed NPPF revisions give additional emphasis to meeting regional economic growth (and weight to the future Spatial Development Strategies in plan-making).
- 8 The proposed NPPF Policy E1.1.a also sets out a clear alignment between the economic strategic priorities and the Industrial Strategy with the plan-making. The Industrial Strategy emphasises the role of the freight and logistics sector and its part in growing the economy nationally and has stated that a new plan for the sector will be published in due course. It is on this basis that anticipated regional and national priorities for the sector will be further weighted in the near future, making it even more important to consider those needs now as part of emerging plans.
- 9 Moreover, NPPF paragraph 87b and the proposed NPPF E1.2 aim to allow for flexibility across a variety of scales; the draft NPPF E1.2 in particular states that development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage). The rationale of, effectively, carrying over an outdated legacy policy against the identified needs for larger units is not sound, given the evidence of demand for larger-scale industrial and warehousing units in the area. As aforementioned, both Council’s evidence and the latest market evidence (in **Appendix 1**) highlight the undersupply of larger industrial and warehousing units in Greater Cambridge.
- 10 In addition, the potential consequence of Policy J/NE 7 as phrased, would be to give rise to unmet strategic B8 needs. The Planning Practice Guidance (‘PPG’) paragraph 031 advises that, where needs for strategic facilities exist, policy-making authorities should collaborate with infrastructure providers and other parties to identify the scale of need across the relevant market, and the authorities will then need to consider the most appropriate locations for meeting these identified needs. The proposed NPPF Policy E2.2 goes further in this regard, by stating that, if market signals demonstrate undersupply of specific types of land or premises, considering the relevant catchment area (which could expand beyond Greater Cambridge’s boundaries), or specific locational requirements exist, then, in compliance with the proposed NPPF S5, the development could be permitted. In other words, if the GCLP limits the supply of units above 9,300 sq.m, given that this is a historically constrained market, there is the risk that such units would be promoted outside the provisions of the GCLP - through the development management process – with locally needed employment being paradoxically contrary to the provisions of the development plan. By allowing greater flexibility for the proposed allocations to accommodate some strategic larger-scale needs, if required, the GCLP will be more effectively able to demonstrate that it is aligned with the NPPF.
- 11 Furthermore, the policy as presently drafted provides limitations in terms of any future proposal’s viability, as it constrains market flexibility and future occupiers’ choice by limiting options for larger units which, based on market evidence, are subject to high levels of demand.

In summary, the thresholds that limit the size of units in an effort to constrain regional and national activity need to be amended to ensure alignment with the national policy and, more importantly, to

serve efficiently the needs of the local market. On this basis, we propose amendments as presented below.

Policy J/NE 7

*“7. Large scale warehousing and distribution centres providing for national or regional needs will not be ~~permitted~~ **prioritised** in Greater Cambridge. The focus is on meeting the identified Greater Cambridge needs for **an appropriate range of warehousing and industrial uses and unit sizes.**”*

This wording (or similar) provides flexibility while simultaneously highlighting that the Council aims to utilise better the available industrial and warehousing land by promoting a range of activities across various uses, types, sizes and recognises the importance of the market activity in plan-making.

On a similar basis, the supporting information in paragraph 8.19 needs to be amended as below:

*“8.19- Significant additional space for industrial and distribution space has been allocated in the Strategy section of this document responding to identified needs. Proposals for warehouse and distribution centres meeting local needs within or beyond these sites may be supported subject to other policy requirements. However, proposals for large scale warehousing or distribution centres; ~~which for the purposes of this policy we define as those premises generally exceeding 9,300 square metres (100,000 square feet) and which serve a wider regional or national function;~~ **will not be prioritised as the aim of the policy is to provide for a wide range of uses, types and sizes to meet demand across the local area**”.*

Other Policies

Policy CC/NZ: Net zero carbon new buildings

‘Policy CC/NZ: Net zero carbon new buildings’ states that *“Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand then supplying all energy demand through onsite energy generation.”* [Lichfields emphasis].

LDL notes the requirement to follow a hierarchical approach of reduction heat and power demand, however, raises concerns with flexibility on the subsequent requirement to supply all energy demand through on site energy generation, as there may be some instances where this is not possible and/or an alternative off-site solution may be preferable.

Accordingly, LDL considers the below amendments to the wording should be introduced to allow flexibility, where it can be justified:

*“Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand then supplying all energy demand through onsite energy generation, **unless, satisfactorily justified otherwise**”*

Policy BG/TC- Tree Canopy

Part 7 of Policy BG/TC: Improving tree canopy cover and the tree population states that *“Development proposals should maintain a buffer zone of at least 15 metres from the boundary of any ancient*

woodland, ancient and veteran trees, ancient hedgerows and any development boundary, to avoid root damage (known as the root protection area). The size and type of buffer zone will vary depending on the scale, type and impact of the development. All proposals should ensure that appropriately wide buffer strips are possible next to tree groups.” [Lichfields emphasis]

The principle of protecting ancient woodland, ancient and veteran trees, ancient hedgerows is supported through a 15 m buffer zone. However, the inclusion of a 15 m buffer zone from “any development boundary” is unnecessary, as it appears to require a buffer zone from any development boundary, irrespective if there are any *ancient woodland, ancient and veteran trees, ancient hedgerows trees* in this location, or indeed any trees.

LDL therefore proposes this is addressed by the below amendments to Part 7 of Policy BG/TC:

*“Development proposals should maintain a buffer zone of at least 15 metres from the boundary of any ancient woodland, ancient and veteran trees, **and** ancient hedgerows **and any development boundary**, to avoid root damage (known as the root protection area). The size and type of buffer zone will vary depending on the scale, type and impact of the development. All proposals should ensure that appropriately wide buffer strips are possible next to tree groups.”*

Policy GP/LC: Protection and enhancement of landscape character

Part 1.a. of Policy GP/LC: Protection and enhancement of landscape character states that “1. All new development proposals must a. protect, conserve and enhance the local landscape character as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents;” [Lichfields emphasis]

LDL notes that this is inconsistent with Paragraph 187(a and b) of the current NPPF (December 2024) which states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;” [Lichfields emphasis]*

Firstly, we note that the NPPF para 187a only requires that ‘valued landscapes’ are protected and enhanced (i.e. not conserved) and this is not the same as ‘local landscape character’. For ‘local landscape character’, NPPF para 187b is most relevant, for which there is a lower policy requirement to “*recognise the intrinsic character and beauty of the countryside*”.

Therefore, in order to be consistent with the adopted NPPF, LDL considers the below amendments to Policy GP/LC:

“1. All new development proposals must a. ~~protect~~, conserve ~~and enhance~~ the intrinsic character and beauty of the local landscape ~~character~~, as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents;”

Policy J/AW: Affordable workspace and creative industries

Draft Policy J/AW does not (itself) explicitly require ‘affordable workspace’; instead it identifies a detailed specification for affordable workspace, should a future policy require it.

GCLP para 8.44 states that “The Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. We would welcome feedback on the approach through this consultation.”

LDL does not consider an affordable workspace policy to be necessary or appropriate in the industrial and warehouse sectors, having regard to the economic needs, market demand and signals in these sectors, or indeed for any other reason.

Policy I/SD: Servicing and last-mile deliveries

LDL notes Policy I/SD and endorses limb 4 which requires that “Proposals for any new industrial and distribution centres that will generate significant freight traffic must provide sufficient facilities for long-term and overnight lorry parking.” The GCLP also considers the general (non-scheme specific) overnight lorry parking need being met by the expansion of the existing facilities at J24 of the A14, as proposed in allocation ‘S/RRA/SCS Land to the south of Cambridge Services’. We consider this distinction in the two types of overnight lorry parking to be appropriate.

Concluding Remarks

We trust that our representations assist you to progress the draft GCLP to the Reg19 version. We would be happy to discuss any aspect with you, should that assist.

Yours faithfully

Steven Butterworth
Senior Director
BA (Hons) BPl MRTPI

Annex 1: Recommended Changes to Policy

S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

Changes shown by ~~strikethrough~~ (deletes) and underlined (new) red text

What this policy does

3.5.3 *This policy allocates a site on the A14 corridor to help meet the areas need for industrial and logistic space*

Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

Vision and Identity

- 1 *Land North of A1307, Bar Hill (Slate Hall Farm) will be a master-planned employment led development that responds sensitively to the local landscape, and secures access to new green infrastructure for future workers and the local community. It will provide a range of logistics and industrial uses which can support the long-term needs of residents and businesses in Greater Cambridge.*
- 2 *The site's proximity to Northstowe, Cambridge and nearby villages will provide active travel opportunities for employees and visitors and sustainable last-mile delivery opportunities, as well as providing good access to the strategic road network, critical to support the proposed employment uses.*
- 3 *The development of the site will be landscape-led, with new buildings set within a mature landscape setting. The protection and enhancement of wildlife habitats will be prioritised alongside the creation of new open spaces for recreational use by workers and local residents. The ~~site's~~ design of the development will respond to its landscape setting in terms of the height, design and placement of buildings.*

Uses

- 4 *Land North of A1307, Bar Hill (Slate Hall Farm) (site area of 113.3 hectares) is allocated for a major new employment site, as shown on the Policies Map and indicative Spatial Framework. The Development Strategy identifies the site for approximately 2420,000 metres square (GIA) of commercial uses, providing a flexible range of ~~small-to-medium-scale~~ appropriate unit sizes that can support a wide range of businesses and that can be adapted to accommodate changing business requirements within the following uses classes*
 - a *Class B2 (General Industrial);*
 - b *Class B8 (Storage or Distribution) ~~servicing local needs;~~ and*
 - c *Supporting amenities to meet the needs of staff.*

B2/B8 uses are preferred to meet the identified need and exploit the site's strategic location and size. However, E(g)(i) (Offices), E(g)(ii) (Research & Development) and E(g)(iii) (Light Industrial) uses are

also acceptable employment uses, provided these complement the predominant B2/B8 use and collectively comprise a lesser proportion of the employment development floorspace.

The development capacity of the site is to be established through a landscape-led masterplan process.

The development of Land North of A1307, Bar Hill (Slate Hall Farm) ~~must~~ should do the following, unless justified otherwise:

Context

- 5 Take a positive approach to managing and mitigating impacts on the surrounding landscape, including long-range views of the site, by:
 - a retaining and reinforcing existing mature trees and tree belts;
 - b maximising opportunities to create new landscape areas and corridors, ensuring that new buildings are set within a mature landscape context; and
 - c preparing and implementing a landscape-led Masterplan for the site, which must be submitted and approved by the Local Planning Authority as part of the first planning application for the site.
- 6 Retain and respond to the setting of Oakington Brook and its associated flood zone by including substantial areas for green infrastructure and water management.
- 7 ~~Mitigate the impact of the development on Slate Hall Farm, a potential non-designated heritage asset, and its setting.~~
- 8 Prepare appropriate archaeological assessments which consider the extent, character and condition of the archaeological resources and the likely impact of the development on archaeological remains.
- 9 Maintain the usability of the bridleways which run through the site

Built Form

- 10 Take a comprehensive approach to the planning and delivery of the site, including:
 - a Ensuring the landscape-led Masterplan addresses the whole site, ensuring broad alignment between land in different ownerships; and
 - b Preparing a site-wide Design Code to ensure a design-led approach to the site which must:
 - i address building heights, massing and scale to ensure development proposals fit into their context and respond to and reduce or mitigate impacts on key views and vistas; and
 - ii ensuring high-quality design of buildings, including through use of appropriate materials and colour palettes
- 11 Focus built form on the west and central part of the site, with the area to the southeast providing substantial green infrastructure, and water management features along the Oakington Brook.

Public Space

- 12 *Create new parkland and amenity spaces, creating spaces for people working and visiting the site, and spaces focused on biodiversity enhancement*

Nature

- 13 *Prepare and submit, for approval by the Local Planning Authority as part of the first planning application, a site wide biodiversity strategy with an overarching approach to ecology and the environment.*
- 14 *Protect, positively plan for and deliver dark corridors for bats and other nocturna species particularly within the Oakington Brook corridor, including (but not limited to):*
- a *Preparing a site-wide lighting strategy keep lighting to a minimum, which where necessary should be directional and movement sensitive if appropriate*
 - b *Incorporating appropriately sized buffers around woodlands and along the extent of Oakington Brook, which is an important bat corridor. Buffers must be subject to appropriate positive management to maintain biodiversity value including habitats for water vole and otter populations.*

Movement

- 15 *Secure active travel and public transport improvements, ensuring sustainable access to the site for workers and local residents, and ensure the site integrates successfully with the highways network by*
- a *Providing new and improved active travel infrastructure and a Mobility Hub to maximise sustainable methods of travel to, from and around the site, including from larger settlements such as Cambridge, Northstowe, Bar Hill and Cambourne North, Girton, Histon and Impington;*
 - b *Maximising opportunities for sustainable last mile deliveries through cargo bikes, e-vehicles and other sustainable modes; and*
 - c *Providing safe and adequate road access to the site from the Strategic Road Network following engagement with the Highways Authority and National Highways, including junction improvements where required*
- 16 *A trip budget based on detailed evidence must be agreed with the Local Highways Authority prior to planning applications for **further** development. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.*
- 17 *The applicant must submit a comprehensive Transport Assessment, Traffic Management Plan and Travel Plan for the whole allocation with the first planning application. The Traffic Management Plan must include a traffic routing plan and arrangements for enforcement.*
- 18 *To support delivery of the agreed Masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and Local Planning Authority.*

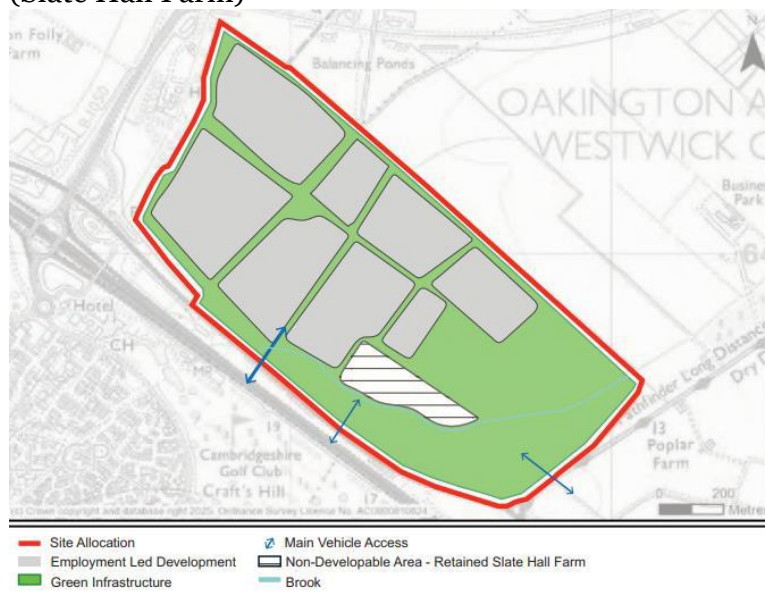
Resources

- 19 *Develop a comprehensive approach to water management strategy, including appropriate avoidance and mitigation measures to address fluvial and surface water flood risk, and which takes opportunities for betterment by controlling run off from the site to reduce flood risk downstream both to Longstanton Brook and Oakington Brook.*
- 20 *Provide appropriate space for the ongoing maintenance of the watercourses.*
- 21 *Planning conditions will be imposed to minimise the adverse effects of construction activity on the amenity of nearby communities and the environment.*

Lifespan

- 22 *A site-wide spatial Masterplan and Design Code must be submitted for approval by the Local Planning Authority as part of the first application for planning permission. Delivery of the development, including any individual phases, must be in accordance with the phasing plan(s) which must accompany the first planning application. **The Masterplan #** must demonstrate how comprehensive development of the site will be achieved, including how and when infrastructure required for each phase will be delivered.*
- 23 *The applicant must also prepare and submit:*
 - a *A comprehensive environmental management and construction strategy for the first planning application and then for all subsequent phases of development; and*
 - b *A strategy for the long-term management and maintenance of landscape, drainage and green infrastructure for the first planning application and then for all subsequent phases of development;*

Figure 108: Indicative Spatial Framework for Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



[Amend Figures 106 and 108 as recommended in our Policy S/SHF representation (above)].

Supporting Information

3.5.4 This site is allocated for employment uses to meet the demand for local warehousing and logistics, advanced manufacturing and general industrial employment floorspace identified in the studies informing the draft Local Plan.

3.5.5 The policy enables a range of **small and medium scale** commercial uses of an appropriate scale to come forward and it will be important that there is sufficient variety in their form and floorplate size and flexibility in their design to ensure that they cater for a range of different business types and can be adapted over time to meet changing local business needs. As the focus of the site should be on meeting the identified local **Greater Cambridge** needs, the site should deliver a range of appropriate **small and medium sized units sizes**. Development should come forward in phases which respond to local needs.

3.5.6 Given the scale and nature of the proposed uses, the policy identifies a positive approach to landscape mitigation, seeking to create an exemplar proposal that is set within a mature landscape. This is to support the health and well-being of those working and visiting the site but also mitigate landscape and long-distance view impacts, existing ecological habitats and species and identified flood risk areas.

Figure 109: Site Plan of Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



[No proposed amends.]

3.5.7 The required mitigation measures also include further Archaeological Assessment, which is required given the archaeological potential in this area. Development is also contingent upon the provision of safe and adequate vehicular access to the public highway,

the provision of active travel connections to nearby settlements and maximising opportunities to facilitate sustainable last mile deliveries, given the site's location close to Cambridge and several nearby towns and villages.

3.5.8 *The southeastern part of the site contains the corridor of the Oakington Brook. This provides a flood risk constraint but also an opportunity to manage water effectively and mitigate flood risk downstream. The area is also important for biodiversity mitigation. Development should therefore be restricted to the north western parts of the site.*