

Your ref: S/RRA/SNR
Our ref: St Neots Road, Dry Drayton
DD:
E:
Date: 20/01/2026

Greater Cambridge Planning Policy
Via Email

Dear Sir / Madam

EMERGING GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION – DRAFT ALLOCATION S/RRA/SNR: LAND TO THE NORTH OF ST NEOTS ROAD, DRY DRAYTON

This representation has been prepared on behalf of Paragon Land & Estates Ltd (hereafter “Paragon”) in relation to their land interests at draft allocation S/RRA/SNR: Land to the North of St Neots Road, Dry Drayton (the “Site”) (see **Appendix 1**).

Paragon is supportive of the draft allocation for employment uses in the emerging Local Plan which recognises that the Site is available, achievable and deliverable. Further, they acknowledge the need to ensure that development across the Site does not prejudice the delivery of the Cambourne to Cambridge Busway nor East West Rail. The Site can also be made available for residential uses should the Council wish to discuss that opportunity.

However, Paragon wishes to make observations regarding the draft policy wording in relation to employment, in particular the restriction of Use Classes across the Site to E(g)(i) office, research and development E(g)(ii) and light industrial (Class E(g)(iii)).

Whilst it is acknowledged that the Site has previously been promoted for such uses, the market has materially moved on since this time, and therefore the range of allocated uses should be expanded to include B2 industrial and B8 storage and distribution. The reasons for which are set out below.

Greater Demand and Industrial and Logistics Uses

Since the Site was first promoted for the uses allocated in the draft policy, there has been a greater recognition of the demand for industrial and logistics warehouse space across Greater Cambridge.

The Council has considered this further within their Greater Cambridge Warehouse and Industrial Space Needs Assessment which was prepared by Icen (March 2025). Table 6.4 of the report identifies indicative land requirements as shown below:



Bidwell House, Trumpington Road, Cambridge CB2 9LD
T: 01223 841841 E: info@bidwells.co.uk W: bidwells.co.uk

Table 6.4 Indicative land requirements by type and location

Type	Proportion of total	Floorspace (sq.m)	Unit sizes (sq.m)	Location
Manufacturing /advanced manufacturing B2	15%	48,000	500 – 5,000	Cambridge commutable
General Industrial B2/B8/E(g)	10%	32,000	500 – 2,500	Urban / urban fringe
Wholesale and trade	10%	32,000	100 – 2,000	Typically urban / urban fringe (trade)
Distribution B8	40%	127,000	2,000 – 5,000+	Strategic Road Network (SRN)
Mid-tech B2/B8/E(g)	10%	32,000	100 – 2,000	Enhanced connectivity to labour market, being urban fringe or science park proximity
Other uses i.e. leisure	15%	48,000	500 – 2,500	Prefer urban / urban fringe
Total	100%	317,000		

Source: Icen Projects (may not sum due to rounding)

This sets out a significant need for warehouse space to satisfy several different functions (residual need of 197,000 sqm). Table 7.5 of the same report further considers existing supply and the approach to distributing need by warehouse / industrial typologies:

Table 7.5 Land recommendations by type and location (notional) (sqm)

Type	Notional need by type (sq.m)	Supply + completions (sq.m)	Residual requirement	Notional approach to distributing residual need by type (sq.m)	Preferred Location
Manufacturing B2	47,550	-6,390 net + 91,200 First Proposals	c.-200,490 (undersupply)	40,000 (10 ha) reflecting limited positive balance	Cambridge commutable
Distribution B8	126,800			100,000 (25 ha)	SRN location / urban fringe for last mile
General Industrial B2/B8/E(g) incl. trade / wholesale	63,400			40,000 (10 ha)	Urban / urban fringe / access
Other uses	47,550	34,652 E(g)(iii)	+2,952 (marginal oversupply)	15,000* (5 ha)	Enhanced urban connectivity / urban fringe / science park proximity
Mid-tech B2/B8/E(g)	31,700				
Total	317,000	119,500	-197,538	197,000	

Source: Icen Projects

There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on this Site.

Given the Site's sustainable location in close proximity to large housing proposals (Cambourne and Bourn Airfield), proximity to Cambridge urban fringe and its strong access to the strategic road network; it could function across the range of uses that may look to take up warehouse space as well as function for the current draft allocated uses.

National Planning Policy Framework (NPPF) – December 2025 Consultation Document

Whilst the NPPF consultation document carries limited weight and is subject to change, it does set a clear direction of travel for national policy, particularly a clear set of rules for plan-making.

The need to consider this draft NPPF for plan-making purposes is reaffirmed by the Secretary of State in his letter to Local Authority Leaders and Metro Mayors¹ in December 2025, however, we acknowledge the Council's intention to prepare this Plan under the old plan-making system and therefore the December 2024 NPPF.

Proposed Policy E1: Providing the conditions for long term economic growth - sets out the rules which development plans should follow to support business investment and employment.

Limb 2 of the emerging policy recognises that commercial property markets can change rapidly, and as a result, 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).

In terms of the Site itself, it does not have any spatial qualities or constraints that mean it must be restricted to E(g)(i), (ii) or (iii) uses only. Rather, it has qualities that mean it should be considered for a wider range of uses (ie: good access to the strategic road network).

Proposed Amendments to Policy S/RRA/SNR

As previously outlined, Paragon is supportive of the draft allocation for employment uses in principle on the Site and believe work to date clearly demonstrates it is available, achievable and deliverable. The Site can also be made available for residential uses should the Council wish to discuss this further we would be happy to do so.

However, based upon the evolving commercial market and the special qualities of the Site, we believe that the allocated uses can be expanded to include B2 and B8. This would also be consistent with the emerging direction of travel in the consultation version of the NPPF.

We have set out the proposed changes in bold below to address the use classes matter and to ensure sufficient flexibility should Cambourne to Cambridge ("C2C") or East West Rail. It is acknowledged that C2C has been subject to a public inquiry, however flexibility needs to be retained in policy terms in case the scheme is not delivered. The proposed changes are below:

- *Site area of 4.6 hectares.*

¹ Secretary of State Letter to Council Leaders 16 December 2025: [Letter from the Secretary of State to local authority leaders and metro mayors: Next phase of reforms to accelerate growth and housebuilding](#)

- Capacity for approximately 5,000 square metres of office (Class E(g)(i)), research and development (Class E(g)(ii)), ~~and light industrial (Class E(g)(iii)),~~ **industrial (B2) and storage and distribution (B8).**

1. Development proposals must demonstrate how they will meet the following requirements:

a. The form of the development will need to account for and ~~provide~~ **safeguard** land for the Cambourne to Cambridge transport scheme ~~that will be~~ **should it be** routed through the site;

b. Implement measures necessary to provide good public transport and active travel access to the site from surrounding existing and planned developments;

c. Development of the site must not prejudice the preferred East-West Rail route alignment or its delivery;

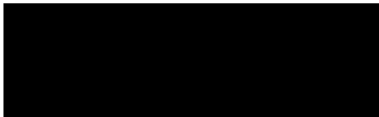
d. Development proposals must enhance the existing southern hedgerow to provide visual screening and include trees of forest scale and understorey planting. Landscape proposals must take into account landscape enhancements associated with the Cambourne to Cambridge Busway and East West Rail; and

e. Must be accompanied by an appropriate archaeological assessment, including the extent, character and condition of the archaeological resource and the likely impact of the development on the archaeological remains.

Summary

I hope the above is clear. However, should you have any questions, or wish to discuss the points made in this representation, please do not hesitate to get in touch.

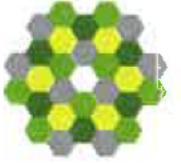
Kind regards,



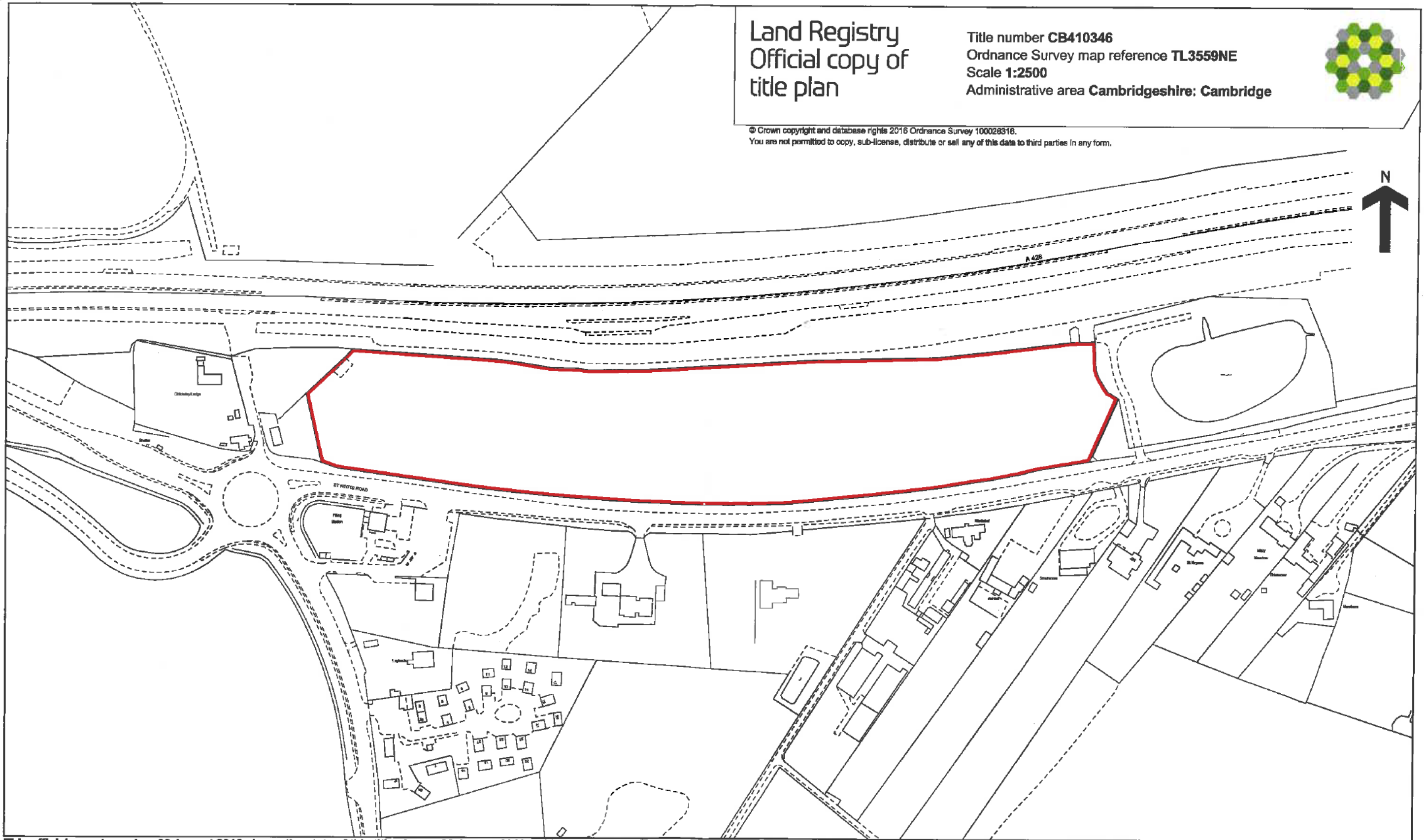
Gareth Pritchard
Partner

Land Registry
Official copy of
title plan

Title number **CB410346**
Ordnance Survey map reference **TL3559NE**
Scale **1:2500**
Administrative area **Cambridgeshire: Cambridge**



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