Consultation Response: Objection to Policy S/RRA/SHF — Land north of A1307, Bar Hill (Slate Hall Farm)

Representation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Respondent: Enabling Place Limited, Madingley

Date: September 2026

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

Summary of representation

We operate a business in Madingley and object to the proposed allocation of land north of the A1307 at Bar Hill (Slate Hall Farm) for employment development of approximately 220,000 sqm GIA. Our objection is grounded in three tests of soundness under the National Planning Policy Framework (NPPF):

1. The policy is not justified. The evidence does not demonstrate that the aspirational mix of smaller B2 units will be delivered. The policy contains no minimum B2 quantum, no reserved plots and no phasing requirement that would secure smaller units ahead of larger B8 buildings — and the LPA's own evidence shows industrial requirements were six times higher than available space at end June 2024, yet developers are still not delivering smaller general industrial units, with B2 land instead lost to housing, offices and laboratories. The market evidence therefore indicates the site will be developed predominantly for B8 logistics, which is a fundamentally different proposition in scale, character and traffic impact.

2. The policy is not effective (deliverable). The transport impacts of the allocation are unresolved. The policy itself acknowledges this by requiring a Transport Assessment, trip budget, HGV-routing plan and monitoring arrangements to be agreed at a later stage. There is no evidence that HGVs generated by the development can reach the strategic road network without routing through Madingley, Dry Drayton and other villages. A second, adjacent logistics development (Tritax Park Queens' Cambridge) is at an advanced pre-application stage under a Planning Performance Agreement — with DPD already committed as first occupier — and no cumulative assessment has been published (Logistics Matters; Tritax Big Box). These two villages have local road connections between the A1307 and A428 which are marked as ‘Unsuitable for HGVs’. Both villages have experienced an increase in traffic volumes and HGVs since the A14 upgrade and the creation of the A1307 Local Access road.

3. The policy is not consistent with national policy. The NPPF requires that planning policies should be underpinned by relevant and up-to-date evidence (NPPF). The transport evidence base does not adequately assess HGV routing, cumulative impacts, or the effects on village communities, and the allocation proceeds without a

demonstrated direct connection to the strategic road network. The policy is accordingly unsound unless modified as set out below.

2. The policy is not justified

2.1 The policy aspiration for B2 delivery is not supported by evidence

The supporting text states that "the site should deliver a range of small and medium sized units" (defined as less than 9,300 sqm / 100,000 sq ft) and that "development should come forward in phases which respond to local needs" (Policy S/RRA/SHF, Proposed Submission Greater Cambridge Local Plan). However, the policy does not secure a minimum quantum of B2 floorspace, does not reserve plots for B2 use, and does not establish any delivery mechanism that would ensure smaller units are built before or alongside larger B8 buildings.

The distinction between a policy aspiration and a policy requirement is fundamental. An allocation that merely permits B2 use while structurally incentivising B8 development is not justified by evidence — it is an expression of hope.

2.2 The Council's own evidence shows the market is not delivering B2 floorspace despite overwhelming demand

The problem is not absent demand — the Council's own evidence shows the opposite. Its Jobs Topic Paper for the emerging Plan records Bidwells' finding that, owing to limited new development and the continued loss of industrial space to other uses, **industrial requirements in Cambridge were six times higher than available space at end June 2024** (Jobs Topic Paper, October 2025). LSH report that the local industrial land market "continues to grapple with strong competition from more valuable commercial uses, predominantly science and technology". Stakeholders consulted for the same study reported displacement of general industrial tenants from land allocated for residential — "it feels like industrial is at the bottom of the pile" — and that occupiers unable to find production space "invariably move out to Huntingdonshire, Ely or other locations".

This is the decisive viability evidence for this allocation: if six-fold excess demand is not producing small-unit B2 development, the constraint is not demand but the developer's appraisal. Granting a permission-shaped aspiration for B2 on a site whose highest-value use is a B8 big-box estate adds nothing.

The monitoring record confirms the same pattern at the level of delivery: 4,701 sqm of B2 manufacturing space demolished at Sawston Trade Park for offices; around 3 hectares of B1/B2/B8 land at Gamlingay and 9 hectares at Dales Manor, Sawston, being redeveloped residentially; and 1.34 hectares of South Cambridgeshire employment land lost to other uses in 2024–25 alone (Greater Cambridge Authority Monitoring Report 2024–25). The 2024–25 net gain of 7.72 hectares of business land was dominated by R&D and office completions on established campuses (Granta Park,

Lockton House); no comparable delivery of small-unit general industrial floorspace is recorded. The Council's own commissioned study recommends around 317,000 sqm of additional industrial and warehousing space across the plan area — yet the Slate Hall Farm policy secures no mechanism that would ensure any of its aspirational 40% B2 component is actually built.

Delivery experience reinforces the point. At Cambourne, employment-designated land owned through the Council's own investment partnership was redeveloped for housing (Property Week; Cambium Square); at Northstowe, Council-owned Enterprise Zone land has delivered no employment floorspace in over a decade (SCDC Northstowe report). Whatever the eventual mix intended for those sites, neither demonstrates that allocation alone produces industrial delivery — and neither involved a developer voluntarily choosing small-unit B2 over a higher-value alternative use.

2.3 The market evidence points to a B8-dominated outcome

Cambridge has strong demand for large industrial and logistics units. The latest local market evidence records 117,000 sq ft of industrial take-up in the first half of 2025, with a further 50,000 sq ft under offer, a shortage of units above 50,000 sq ft, and prime standard industrial rents reaching £20 per sq ft (Bidwells, Cambridgeshire Industrial Databook, September 2025). The national big-box logistics market also remained active: H1 2025 take-up exceeded the pre-Covid average, with 44 big-box units under offer, although most vacant stock was second-hand and new speculative development remained limited (DTRE Big Box Logistics Report, Q2 2025).

This evidence supports a substantial B8 opportunity at Slate Hall Farm but simultaneously undermines the case for smaller B2 delivery. A developer weighing options will compare:

- A multi-let B2 estate with slower absorption, higher servicing costs, more walls, doors, circulation space and estate infrastructure per square metre, a fragmented tenant base, and rent-sensitive local occupiers; against
- A large B8 building with a single or small number of occupiers, stronger covenant strength, clearer investment value, and the ability to support a higher land value.

Unless the planning framework controls phasing or reserves land specifically for B2, the second option is likely to dominate. The site's strategic location — which the policy cites as a benefit — actually makes smaller B2 units less deliverable, because the land has an alternative use capable of supporting a higher-value logistics development.

2.4 The likely market-led floorspace outcome

For the 220,000 sqm allocation, a realistic market-led expectation is:

Use class	Policy aspiration	Market-led outcome
B8 (logistics/warehousing)	~60%	~75% (165,000 sqm)
B2 (general industrial)	~40%	~25% (55,000 sqm)

The "B2" element is most likely to comprise hybrid industrial/storage units, advanced manufacturing or assembly space, trade-related industrial uses, or larger units with ancillary storage — delivered in a later phase after the principal B8 development. Pure small-unit B2 development is the least certain component, and the greatest risk is that nominally "B2" floorspace is delivered as flexible space that can subsequently be occupied as B8 or another more profitable use. *(See supporting tables document, Table 1.)*

2.5 The distinction between demand and deliverable demand

It is useful to separate three types of demand:

- **Underlying B2 demand:** businesses that would like local industrial premises.
- **Effective B2 demand:** businesses able and willing to pay the rent needed for new-build space.
- **Deliverable B2 demand:** demand that produces a viable development scheme at current land and construction costs.

The Council's own evidence base illustrates the gap between the first and third categories. Six-fold excess demand over supply, combined with continuous loss of existing industrial land to higher-value uses, demonstrates effective and underlying demand that does not translate into deliverable schemes: the land economics defeat the appraisal at every existing Cambridge-area site, and nothing in the Slate Hall Farm policy changes that arithmetic. Enterprise Zone status and rates relief may improve occupier demand, but they do not by themselves solve the developer's appraisal problem.

For Slate Hall Farm, the policy needs to distinguish between: B2 floorspace that is merely permitted; B2 floorspace that is secured through a phasing or delivery requirement; B2 floorspace that is demonstrably viable at the proposed land value; and flexible B2/B8 floorspace that may in practice operate as B8. Without those distinctions, the allocation could deliver the strategic logistics function while failing to provide the smaller mid-tech / industrial premises that the policy is intended to secure.

3. The policy is not effective (deliverable)

3.1 The transport impacts are unresolved

The policy allocates approximately 220,000 sqm of employment floorspace. The closest comparable scheme is Newlands Park Cambridge, a proposed logistics development on land near Swavesey/Boxworth (approximately 6 miles west of Slate Hall Farm). A TRICS-based traffic movement estimate prepared for Boxworth Parish Meeting calculated that a 150,000 sqm logistics development at that site would generate approximately 525 HGV movements per weekday, alongside approximately 1,275 van movements and 2,540 car movements — a total of approximately 4,350 daily vehicle movements (Boxworth Parish Meeting, Boxworth Gateway — TRICS-based traffic movement estimate). For context, daily HGV movements into Cambridge Services on the A14 total 750–785 (Boxworth Parish Meeting). Scaling the Newlands TRICS-derived HGV figure proportionally to the Slate Hall Farm allocation (220,000 sqm — approximately 47% larger) produces an estimate of approximately 770–777 HGV movements per weekday if the site is developed entirely for B8 logistics. This equates to approximately 32 HGV movements per hour averaged across 24 hours; 49 per hour over a 16-hour operating day; or 65 per hour over a 12-hour operating day. These figures represent one-way movements, so they could involve approximately 389 HGV arrivals and 389 departures each weekday. *(See supporting tables document, Table 2.)*

3.2 A market-realistic HGV estimate

Even under a more conservative, market-realistic scenario (75% B8 / 25% B2) using moderate HGV generation rates (0.75 HGV arrivals per 1,000 sqm per operating day for B8 and 0.25 for B2 — indicative figures for consultation purposes, to be tested against TRICS data and site-specific transport evidence at the planning application stage), the likely full-occupation total could be approximately:

Component	Floorspace	Arrivals/day	Departures/day	Movements/day
B8	165,000 sqm	124	124	248
B2	55,000 sqm	14	14	28
Total	**220,000 sqm**	**138**	**138**	**276**

Assuming six operating days per week, this equates to approximately 1,656 HGV movements per week.

If the B8 element becomes a high-intensity parcel, grocery or third-party logistics (3PL) operation, the B8 rate could approach 1.0 arrival per 1,000 sqm per day. On that basis, the site could generate approximately 370–410 HGV movements per day, depending on the final B2/B8 split.

3.3 The policy acknowledges that transport effects are unresolved

The policy requires: "A definitive trip budget based on detailed evidence… agreed with the Local Highways Authority prior to submission of the outline application"; a "strategic

and local transport mitigation plan… prepared by the developer in consultation with the Local Highways Authority, Local Planning Authority and National Highways"; financial contributions towards transport measures; and a "monitor and manage approach… throughout the site's delivery" (Policy S/RRA/SHF, Proposed Submission Greater Cambridge Local Plan). These requirements are acknowledgments that the transport effects of the allocation have not been assessed, let alone resolved, at the plan-making stage. An allocation that defers its own transport evidence to the planning application stage is not effective — it is a placeholder.

3.4 Highway connectivity and the risk of village routing

The site is described as strategically close to the A14, M11 and A428. But proximity alone does not ensure that HGVs will use those routes. If the site is connected primarily through the local road network, operators and satellite-navigation systems may route vehicles through Madingley and Dry Drayton where this provides a shorter, faster or more reliable connection between the site and the M11, A428 or destinations to the south and west.

The limited connectivity between the A14, M11 and A428 increases this risk. Traffic seeking to move between these strategic routes may use the A1303/Madingley corridor and connecting roads rather than remaining on the national highways network. This could turn the villages into informal distributor routes for a large logistics estate. The risk is structural rather than marginal: the site's only realistic non-strategic fallback route towards the A428 and M11 to the south and west passes through the Madingley corridor, and the corridor's history demonstrates its attractiveness to through-traffic.

There is currently no published evidence demonstrating what proportion of the forecast HGV movements would use these roads. A sensitivity analysis is therefore necessary. On the estimated 777 daily movements (full B8 scenario), the effects could be approximately:

Village-route share	HGV movements per day
10%	78
20%	155
30%	233
50%	389

Even a 20% village-route share would mean approximately 155 additional HGV movements per weekday through the two-village network, or around six to seven per hour averaged across 24 hours. If divided equally, this would be approximately 78

movements per day through each village. The actual peak-hour effect could be considerably higher. On the more conservative market-realistic estimate (276 movements/day), a 20–30% village-route share would still produce approximately 55–83 additional HGV movements per weekday through Madingley and Dry Drayton. The Transport Assessment required before the allocation is confirmed should test this full range of village-route shares, not a single central assumption. *(See supporting tables document, Table 3.)*

The relevant question is not whether the site is adjacent to the A14 — it is whether the proposed access arrangements will physically and operationally ensure that HGVs can reach the national highways network without using unsuitable village roads. The policy does not answer this question.

Before the A14 upgrade (opened 2020), Cambridgeshire County Council undertook modelling (CHARM3a) of the likely traffic impacts on villages surrounding the route, which argued that the new A14 and A1307 Local Access Road would reduce traffic flows through the centre of Madingley from 2,600 to 2,400 vehicles per day. Unsuitable for HGV signs were introduced on all roads into Madingley in 2020.

By 2025 the measured flow is 3,180 vehicles per day, of which 126 are HGVs (ATC survey for Skanska/National Highways, A428 Site 24 High Street Madingley, 17 February – 13 March 2025) — flows already 22–28% above the modelled baseline despite the promised reduction, with counted HGVs rising from ~105/day in 2023 to ~126/day in 2025 with no logistics development yet built in the corridor. With the 20% village-route share used above, the Slate Hall Farm allocation alone could increase the number of HGVs through the village by at least 40%.

The cumulative impacts of other proposed B8 developments along the A1307 corridor are only likely to increase the number of HGVs unless mitigation measures are put in place to prevent HGV traffic using the village-to-village link roads as convenient alternatives to the main road network. *(See traffic evidence summary, Attachment 3.)*

3.5 Cumulative impact of A14 logistics proposals

The Slate Hall Farm allocation is not an isolated proposal. It is one of four major logistics and industrial schemes clustered along approximately six miles of the A14 corridor west of Cambridge, each at a different stage of the planning process:

a. Slate Hall Farm ("Cambridge 25"), Bar Hill — draft Local Plan allocation; outline application submitted. Policy S/SHF allocates 113.3 hectares north of the A1307 for approximately 220,000 sqm GIA of B2/B8 floorspace (Policy S/SHF, draft Greater Cambridge Local Plan). An outline planning application (ref. 26/02534/OUT) has been submitted for up to 230,000 sqm GIA across Use Classes E(g)(i–iii), B2 and B8

(Swavesey Parish Council); the promoter indicates around 2,900 permanent jobs (Cambridge 25).

b. Tritax Park Queens' Cambridge, Noon Folly Farm — pre-application, PPA agreed. Tritax Big Box is preparing a detailed planning application for a logistics and advanced manufacturing park on a 304-acre site immediately adjacent to Slate Hall Farm at A14 Junction 25, comprising five units totalling approximately 892,000 sq ft (~83,000 sqm), targeting BREEAM Excellent and EPC A ratings (Logistics Matters, "DPD secures build-to-suit at proposed 900,000 sq ft Cambridge scheme"). No application has yet been submitted; the promoter is working with Greater Cambridge Shared Planning Service under a Planning Performance Agreement, with a detailed application expected imminently (Tritax Big Box project page). DPD has signed an Agreement to Lease for a purpose-built 63,000 sq ft parcel hub (Logistics Matters; Tritax Big Box). The scheme is expected to deliver 2,500–3,000 FTE jobs, with phase 1 anticipated on site in Q1 2027 and full completion in 2029, subject to planning.

c. Newlands Park Cambridge, Brickyard Farm, Boxworth — promoted scheme, no application. The proposal is to develop the site adjacent to the A14/Boxworth Services, covering 220 acres (approx. 80 hectares) with up to 150,000 sqm of warehousing space in 14 buildings with eaves heights of up to 21m. A planning application is yet to be submitted, but it is Newlands' intention to submit an application later this year (Newlands UK portfolio).

d. Jaynic – south of Boxworth Services — draft Local Plan allocation. Policy S/RRA-2 allocates 24.26 hectares south of Boxworth Services for approximately 90,000 sqm GIA of B2/B8 floorspace, including around 2.25 hectares of lorry parking providing approximately 150 HGV spaces (Policy S/RRA-2, draft Greater Cambridge Local Plan).

Aggregate floorspace. The four A14 sites together total approximately **543,000 sqm of B2/B8 employment floorspace within around six miles of the corridor** — 220,000 sqm at Slate Hall Farm, up to 150,000 sqm at Newlands, approximately 83,000 sqm at Tritax Park and 90,000 sqm at Jaynic. In addition, the draft Local Plan allocates 108,000 sqm GIA of employment floorspace at Cambourne North (13,000 homes) and 3,500 homes at Bourn Airfield (outline consented July 2024), both feeding the same A428/A1307 corridor (Boxworth Parish presentation, 11 December 2025).

The evidence gap. The Slate Hall Farm policy expressly requires "a cumulative assessment of other planned employment, housing and highway schemes in the A14/A428/M11 corridor" (Policy S/RRA/SHF). No such assessment has been published. Yet the planning authority is simultaneously:

- determining an outline application for up to 230,000 sqm at Slate Hall Farm (ref. 26/02534/OUT) (Swavesey Parish Council);

- scoping a detailed application for an adjacent logistics park at Tritax Park Queens' Cambridge under a Planning Performance Agreement (Tritax Big Box); and
- consulting on the draft Local Plan allocation for Jaynic (Policy S/RRA-2).

This is a fundamental evidence gap. The Council cannot demonstrate that the cumulative transport, environmental, landscape, flood-risk and infrastructure impacts of approximately 543,000 sqm of logistics floorspace across four sites within six miles of each other — including two immediately adjacent schemes at Junction 25 — plus the housing growth at Cambourne North and Bourn Airfield, have been assessed, let alone that they are capable of being mitigated. The requirement for cumulative assessment is a policy condition of the Slate Hall Farm allocation itself; it should be satisfied before the outline application is determined, not after. *(See supporting tables document, Table 4.)*

3.6 No direct strategic road connection is secured

The primary mitigation for HGV impact should be a direct, fully engineered connection from the development to the national highways network, designed in consultation with National Highways and the local highway authority. Local road connections should not be used as the principal means of serving a strategic scale logistics development. The policy does not require this. It refers to the site's "proximity" to the A14 and its "good access to the strategic road network" but does not commit to a specific, direct HGV delivery access arrangement. If a direct strategic connection cannot be delivered before occupation, the allocation should not permit B8 logistics use at the proposed scale.

4. The policy is not consistent with national policy

4.1 Inadequate evidence base

The NPPF requires that planning policies should be "informed by, and based on, relevant and up-to-date evidence" (NPPF). The transport evidence base for the Slate Hall Farm allocation does not include:

- A detailed origin-and-destination assessment for HGVs, vans and cars associated with the maximum proposed floorspace;
- Junction and link modelling for the A14, M11, A428, A1303, Madingley, Dry Drayton and connecting local roads;
- Route-choice modelling using realistic travel times, congestion, junction delays and satellite-navigation behaviour;
- Separate reporting of HGV movements (rather than combining HGVs with general traffic);

- Peak-hour and overnight assessments;
- A cumulative assessment incorporating the Tritax Park Queens' Cambridge proposals and other planned employment and housing schemes;
- Automatic traffic counts and classified vehicle surveys in Madingley and Dry Drayton; or
- A safety assessment covering village centres, narrow roads, bends, junctions, footways, cycle routes, schools, bus stops and vulnerable road users.

4.2 Premature allocation

The NPPF requires that plans are justified — based on proportionate, up-to-date evidence — and effective, meaning deliverable over the plan period, and that plan-making addresses the cumulative impacts of development (NPPF). An allocation that defers all transport assessment to the planning application stage, does not secure a direct strategic road connection, and has not assessed the cumulative impact of an adjacent scheme of comparable scale is premature: the plan has not been shown to be effective, and the residual risk falls on villages whose ability to accommodate that impact has never been tested. Development should only proceed where its impacts would not be unacceptable (NPPF); on the present evidence base, the acceptability of these impacts is simply unknown.

5. Required evidence before the allocation proceeds

The Council should require a full, independently reviewed Transport Assessment before confirming the allocation. It should include:

1. A detailed origin-and-destination assessment for all HGVs, vans and cars associated with the maximum proposed floorspace.
2. Junction and link modelling for the A14, M11, A428, A1303, Madingley, Dry Drayton and all connecting local roads.
3. Route-choice modelling using realistic travel times, congestion, junction delays and satellite-navigation behaviour.
4. Separate reporting of HGV movements, rather than combining HGVs with general traffic.
5. Peak-hour and overnight assessments, not only daily averages.
6. Cumulative assessment of the Slate Hall Farm outline application (26/02534/OUT), the Tritax Park Queens' Cambridge proposals, the proposed Newlands Park Cambridge scheme, and all other planned employment, housing and highway schemes in the A14/A428/M11 corridor.

7. Automatic traffic counts and classified vehicle surveys in Madingley and Dry Drayton before development is approved.
8. A comparison of alternative access options, including a direct connection to the strategic road network.
9. A safety assessment covering village centres, narrow road, bends, junctions, footways, cycle routes, schools, bus stops and vulnerable road users.
10. An independently audited HGV assignment model, with the underlying assumptions and matrices made publicly available.

6. Required mitigation if the allocation proceeds

If the allocation is maintained, the following measures should be secured through the allocation policy, planning conditions, a Section 106 agreement and, where appropriate, a highway agreement:

6.1 Direct strategic road connection

- The main HGV access should connect directly to the A14 or another demonstrably suitable strategic road junction, not via the A1307.
- The access should be designed to accommodate the largest anticipated HGVs without requiring them to use Madingley or Dry Drayton.
- Local road connections should be restricted to local traffic, emergency access, walking, cycling and public transport, unless an independent assessment demonstrates that they cannot be used by through HGVs.
- The site layout should prevent HGVs from bypassing the strategic access through secondary estate roads.

6.2 Phased occupation and trip caps

- If a direct strategic connection cannot be delivered before occupation, the allocation should not permit B8 logistics use at the proposed scale.
- Any interim permission should be subject to a strict phased cap and a binding requirement that the strategic connection is operational before further floorspace is occupied.
- Occupation should be limited by a binding HGV trip budget. Additional floorspace should not open until monitoring demonstrates that the agreed routing arrangements are effective.

6.3 Measures to prevent HGV traffic through Madingley and Dry Drayton

1. **Extend the existing environmental HGV Limits** to include both Dry Drayton and Madingley. At present these cover the area between the A14 and A428 from Hilton to Boxworth, but does not cover the link roads through Dry Drayton and Madingley.
2. **Mandatory HGV routing plan.** Every occupier and logistics operator should be required to route HGVs to and from the site via the designated strategic road access, covering both inbound and outbound journeys, including empty vehicles.
3. **Physical restrictions.** The highway authority should assess weight, width, height or access restrictions on roads where HGV through-routing would be unacceptable, with legally enforceable restrictions, suitable signing, and exemptions for genuine local deliveries.
4. **ANPR monitoring.** Automatic number-plate recognition cameras should be installed at site exits and on key roads through Madingley and Dry Drayton, with data identifying HGVs using prohibited routes.
5. **GPS-based compliance.** Operators should be required to use route-compliant GPS systems, with contracts prohibiting routing through the villages except for authorised local deliveries or emergencies.
6. **Enforceable penalties.** The developer and occupiers should face financial penalties for repeated non-compliance, with funds ring-fenced for village traffic management, road safety and monitoring.
7. **Real-time route management.** The routing system should not redirect HGVs through the villages during congestion, incidents or closures on the A14, M11 or A428. Emergency diversion arrangements should be agreed in advance with the highway authority.
8. **Trigger-based mitigation.** Predetermined trigger levels should require additional measures if HGV flows through either village exceed the agreed baseline by specified amounts.
9. **Construction traffic controls.** Construction HGVs should be subject to the same routing restrictions as operational traffic, with a separate Construction Traffic Management Plan, delivery booking system and enforcement regime.
10. **Long-term monitoring.** Monitoring should continue for the lifetime of the development, not just during the first year of operation. Results should be published regularly and reviewed by an independent highway consultant.
11. **Village safety improvements.** Any residual traffic increase should fund independently designed improvements to footways, crossings, visibility, speed

management, cycle routes and bus-stop facilities. These measures should not be treated as a substitute for preventing inappropriate HGV routing.

6.4 B2 delivery mechanism

- The policy should secure a minimum quantum of B2 floorspace through a phasing or delivery requirement, not merely permit it.
- B2 plots should be reserved and brought forward in early phases, before the principal B8 development.
- Public-sector intervention should be considered for B2 delivery, given that neither market-led delivery nor Local Plan policies have managed to produce B2 floorspace at the scale needed — the onus is on the Council to justify why this allocation will differ.

7. Conclusion

The proposed allocation of land at Slate Hall Farm has the potential to generate approximately 276–777 additional HGV movements per weekday, depending on the B2/B8 split and operating intensity. This range is consistent with — indeed more conservative than — the trip rates implied by the best available corridor evidence: the Newlands TRICS-based estimate, prepared for a 150,000 sqm development at a comparable corridor location, equates to around 3.5 HGV movements per 1,000 sqm per weekday, and scaled to Slate Hall Farm's 220,000 sqm this implies approximately 770 HGV movements per day (Boxworth Parish Meeting TRICS estimate; Newlands UK portfolio). Measured HGV traffic on Madingley High Street currently stands at approximately 126 vehicles per day (ATC survey, February–March 2025, classes 5–11, Skanska for National Highways). Even under a more conservative market-realistic scenario, and even if only 20–30% of HGVs misroute through village roads, this represents between 55 and 233 additional HGV movements per day through Madingley and Dry Drayton — an increase of up to 185% over the existing measured flow — in communities that have no strategic road function and whose road geometry, footways and junctions are wholly unsuited to HGV traffic. The 276–777 range covers Slate Hall Farm alone, while the corridor-wide HGV generation — including Newlands' 525/day and Jaynic's 150-space lorry park — will be materially higher.

The policy is not justified because the evidence does not demonstrate that the aspirational B2/B8 mix will be delivered. The LPA's own evidence shows industrial requirements six times higher than available space, with sustained land-value competition from higher-value uses ensuring that neither the market nor previous allocations have delivered small-unit B2 floorspace (Jobs Topic Paper; AMR 2024–25).

The policy is not effective because the transport impacts are unresolved, no direct strategic road connection is secured, and no cumulative assessment has been

conducted with the adjacent Tritax Park Queens' Cambridge development (pre-application, PPA agreed with Greater Cambridge Shared Planning Service; approximately 892,000 sq ft / ~83,000 sqm across five units, with DPD signed as first occupier — Tritax Big Box; Logistics Matters).

The policy is not consistent with national policy because it is not underpinned by relevant and up-to-date transport evidence (NPPF), does not meet the NPPF's requirements for sound plan-making, and defers fundamental impact assessment to the planning application stage.

The allocation is unsound unless modified. It should be opposed or deferred unless the Council can demonstrate that:

1. A direct and suitable connection to the national highways network will be delivered;
2. Local road access will not be used by through HGVs;
3. The transport impacts have been modelled transparently and independently, including cumulative assessment with the Tritax Park Queens' Cambridge proposals;
4. The development will operate within a binding HGV trip budget;
5. Enforceable physical, technological and financial measures will prevent HGV traffic through Madingley and Dry Drayton; and
6. A credible delivery mechanism secures the B2 floorspace that the policy aspires to deliver — or the allocation is honestly recast as a strategic logistics site — part of a six-mile-long corridor of "big boxes" 21m+ tall from Cambridge Services up to the edge of the Green Belt — and assessed accordingly.

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