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Date: 25 September 2026
Our ref: 63559/01/SB/JHy/41636653v1

Dear Sir/Madam

Greater Cambridge Local Plan 2024-2045: Proposed Submission (Regulation 19) - Representation on behalf of Lolworth Developments Limited

Introduction

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 19) ('GCLP') consultation, which runs until 25 September 2026, further to our representation to the previous Regulation 18 version of the Local Plan (30 January 2026) and our previous GCLP submissions.

LDL is actively promoting the Cambridge 25 site to the east of the improved Junction 25 of the A14, opposite Bar Hill, for a sustainable employment park development. The Cambridge 25 site (c.103ha application site) forms the primary part of the proposed 113.3ha site allocation *'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)'* in the draft GCLP.

Consistent with para 1.16 of the Regulation 19 GCLP, LDL representations comment on the GCLP's ability to be found sound, as set out at paragraph 36 of the NPPF (12 December 2024, as amended 7 February 2025).

LDL requests participation in the examination hearing session(s) on the site allocation, employment, development strategy and related policies subject of our representation below.

We also welcome further dialogue with Greater Cambridge Shared Planning on the GCLP.

Structure of Representations

Our representations comment on the nine policies identified below. As requested, we have also submitted each policy response separately, via the online consultation system.

The focus of our representation on each policy is in the context of the Cambridge 25 proposal on the majority of the S/SHF: Land north of A1307 Bar Hill (Slate Hall Farm) site. We therefore first deal with

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this site allocation policy S/SHF, prior to then presenting our representations on the need, development strategy, employment development and other policies (as set out below).

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).

Our representation is also accompanied by various **appendices**, principally but not only forming part of the evidence we provide supporting policy S/SHF.

The policies subject of our representation and their accompanying appendices are as follows:

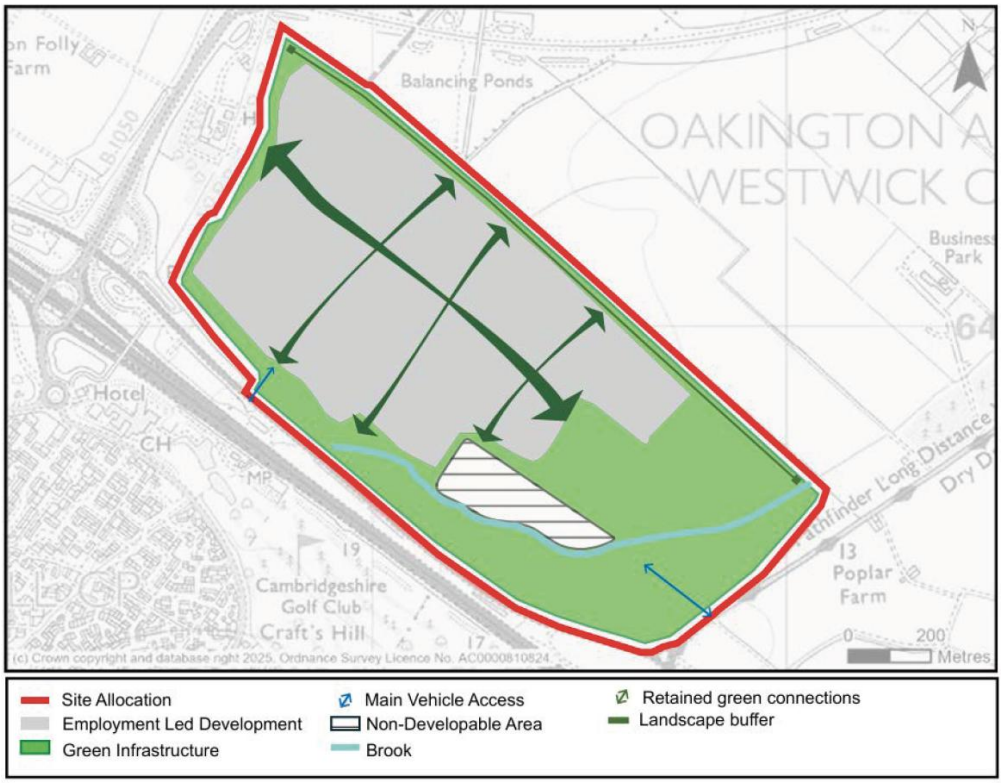
- **Policy S/SHF**: Land north of A1307, Bar Hill (Slate Hall Farm):
  - a Appendix 1 - Outline Planning Application (ref.26/02534) Schedule of Submission Documents and Drawings. As well as Sharepoint link to application submission Submission. Note application submission can also be downloaded on planning register (26/02534/OUT).
  - b Appendix 2 - Recommended changes to HELAA Assessment (HELAA Site ID-40248) for the Cambridge 25 application site.
  - c Appendix 3 - Delivery Statement (Salhia, September 2026).
  - d Appendix 4 - The Slate Hall Farm Building Heritage Appraisal (RPS Tetra Tech, 26 January 2026)
  - e Appendix 5 - Greater Cambridge's Conservation Officer consultation response (dated 04 August 2026) to Outline Planning Application (ref. 26/02534).
  - f Appendix 6 - Market Demand Assessment Chapter of the Cambridge 25 Market Assessment (Savills, May 2026).
  - g Appendix 7 - West Suffolk Local Plan Examination in Public and Inspector's Report (1 July 2025), relevant extracts (pages 1, 5, 9, 23-24 & 60-61)
  - h Appendix 8 - Review of Viability for Policy J/AW (Lichfields, September 2026)
  - i Appendix 9 - Evidence of Rental Values (Bidwells, September 2026)
- **Policy S/JH**: New jobs and homes
- **Policy S/DS**: Development strategy
  - j Appendix 6 - Market Demand Assessment Chapter of the Cambridge 25 Market Assessment (Savills, May 2026)
- **Policy J/NE**: New Employment Development Proposals
  - k Appendix 6 - Market Demand Assessment Chapter of the Cambridge 25 Market Assessment (Savills, May 2026)
- **Policy J/AW**: Affordable workspace and creative industries
  - l Appendix 8 - Review of Viability of Policy J/AW (Lichfields, September 2026)
  - m Appendix 9 - Evidence of Rental Values, prepared by Bidwells

- **Policy I/SD**: Servicing and last-mile deliveries
- **Policy J/EP**: Supporting a range of facilities in employment parks
- **Policy CC/NZ**: Net zero carbon new buildings
- **Policy GP/LC**: Protection and enhancement of landscape character

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

LDL's Cambridge 25 site (c.103ha application site) forms the primary part of the proposed 113.3ha site allocation *'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)'* in the draft GCLP *"for a major new employment site"*. The Indicative Spatial Framework identifying the extent of the Site Allocation is shown at Figure 1.

Figure 1 Indicative Spatial Framework for Policy S/SHF: Land North of A1307, Bar Hill (Slate Hall Farm)



Source: Regulation 19 GCLP Figure 89.

LDL welcomes and supports the site allocation and most of the draft Policy S/SHF wording, this being a continuation of the site allocation and policy from the Regulation 18 GCLP consultation (December 2025).

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Greater Cambridge Evidence Supporting Policy S/SHF Allocation

Planning Practice Guidance (Paragraph: 001 Reference ID: 3-001-20190722) requires plan-making LPAs to undertake "*An assessment of land availability* [to identify] *a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.*"

The Greater Cambridge Housing and Economic Land Availability Assessment ('HELAA'), identifies that both the Cambridge 25 site (HELAA Site ID-40248) and the S/SHF site (HELAA Site ID- 05277) are suitable, available and achievable for economic development uses over the plan period.

Informed by the HELAA and the wider GCLP evidence base, SCDC/CCC have identified the S/SHF site as the most suitable site to meet the majority of Greater Cambridge's strategic B2/B8 development requirements.

The Greater Cambridge Development Strategy Topic Paper (July 2026) explains (at para 5.27) that:

"For industrial and warehousing space, the EHNU 2025 identified a shortfall in space for the plan period that the draft plan needs to meet. As set out in tables 5 and 6 below, sites identified in the Proposed Submission Local Plan provide a flexible supply that more than meet the identified industrial and warehousing floorspace needs for the plan period, noting that precise delivery timing of space at the sites is uncertain. In particular, at the mixed-use strategic allocations, delivery typically follows behind that of housing, and as such may come forward beyond the plan period. Land at Slate Hall Farm, Bar Hill, is a very large site that will come forward in phases and may also continue beyond the plan period."

The Development Strategy, forming policy S/DS, identifies the S/SHF site as one of *the "strategic scale allocations…proposed to meet the majority of the development needs to 2045 and beyond"* as follows (at 2 e. i.):

"Slate Hall Farm, Junction 25, A14 - an allocation for 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: including approximately 220,000 square metres 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 Greater Cambridge Sustainability Appraisal (LUC, July 2026) (paras 5.714-5.722) assesses the draft allocation against the relevant 13 of the 15 Sustainability Appraisal objectives (at Table 5.71), finding the site to score positively against all criteria, bar the 'efficient use of land' objective.

LDL Additional Evidence Supporting Policy S/SHF Allocation

Following pre-application engagement with the GCSP, SCDC and other stakeholders, LDL submitted an Outline Planning Application (OPA) for the Cambridge 25 site (ref.26/02534), validated on 03 July 2026, for the following development:

"Development of up to 230,000 m2 GIA of employment floorspace (within Use Classes E (g)(i), E(g)(ii), E(g)(iii), B2, and B8) together with supporting community and amenity space (within Use Classes F1, F2, E(a), E(b), E(d), and E(f)), nature park and biodiversity zone, service yards and

parking areas, formation of primary means of access, associated landscaping, earthworks, drainage and other associated works (outline, all matters reserved except for the principal means of vehicular access to the Site).”

The OPA scheme and the associated plans and assessments (at **Appendix 1)** serve to demonstrate how the Cambridge 25 site and wider site allocation and policy are proposed to be realised and add to the Councils’ GCLP evidence that this site allocation can successfully and promptly be delivered to meet a significant proportion of the identified employment land requirement. The Cambridge 25 ES and the OPA planning assessments provide detailed assessments of the suitability of major industrial and logistics development on the S/SHF site (also at **Appendix 1).**

The Planning Statement (Planning Prospects, June 2026) (Appendix 1) draws those Cambridge 25 assessment findings together in its conclusion (at para 8.13) that:

“The Proposed Development is supported by a comprehensive suite of technical documents. These deal with the need for the scheme, the socio-economic benefits, and then aspects of design and sustainability, landscape and visual considerations, transport and highways, noise and vibration, air quality, ecology and trees, the historic environment, ground conditions, soils and agricultural land, water resources and flood risk, and health impacts. Considering this material as a whole, the Proposed Development is shown to be acceptable, subject to mitigation measures and taking account of identified impacts. In a number of cases – for example in terms of landscape and visual considerations, transport and highways, amenity, arboriculture, and ground conditions – particular attention is drawn to the eminent suitability of the Site to accommodate development of this type.”

We have also prepared a HELAA Update for the Cambridge 25 site (HELAA Site ID-40248) (at **Appendix 2)** to further demonstrate that the site is suitable, available and achievable for major employment park development, drawing on the plans and assessments forming part of the OPA (ref. 26/02534/OUT) submission.

Salhia and LDL are committed to the successful implementation of its Cambridge 25 employment park development on its land and the realisation of the wider allocation site, contributing to the economic vision and growth priorities of the GCLP. Salhia’s development track record and plan for the delivery of Cambridge 25, following planning permission, are explained in its Delivery Statement (at **Appendix 3**).

Salhia anticipates that construction of the completed development will be phased over several years, guided by market requirements, with the indicative development timetable (ES para 3.4.1) (Appendix 1) currently anticipating that the first buildings being completed in 2029.

Proposed Substantive Modifications to Policy S/SHF

LDL supports the site allocation and most of the draft Policy S/SHF wording. However, we consider it is necessary to seek substantive or clarification modifications to a limited number of elements within the policy, to ensure the policy is more appropriately worded and more consistent with the most up to date available evidence. We also comment on and seek changes to elements of the Supporting Information (text) to the policy.

Annex 1 at the end of this letter/representation sets out our recommended (substantive and clarification) changes to Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm). An explanation of our recommended amendments is provided below:

Uses

The strategic location, size and context of the S/SHF site allocation make it the most suitable and sustainable site for strategic B2/B8 uses in Greater Cambridge. However, we consider it is also appropriate for this to accommodate an element of E(g)(iii) (Light Industrial) use within the site allocation, for reasons including:

1 The Council's evidence on industrial need (in the Greater Cambridge Employment and Housing Needs Update 2024 - 2045, published in 2025 ['EHNU 2025']) does not differentiate between light and general industrial uses.

2 The Development Strategy policy, S/DS, in identifying the strategic scale allocations proposed to meet the majority of the employment development needs, identifies a number of sites suitable for a mix of employment uses including 'industrial uses' and 'industrial processes' – i.e. without distinguishing between light and general industry.

3 The proposed affordable workspace and creative industries policy, J/AW, treats E(g)(iii) light industry alongside B2 general industry and B8 warehousing in limb 2., separately from E(g)(i & ii) in limb 1.

4 It is important for there to be a choice of locations for all manufacturing businesses who may wish to locate or expand in the Plan area, including those of a more routine, light industrial, nature, for whom there is commercial benefit in clustering alongside a B2/B8 cluster.

Therefore, whilst there are some differences in the specific locational and market requirements of the general industrial and logistics sector from light industry, the two industrial uses should not be defined separately in a Local Plan land use context.

We also consider that, in addition to the appropriateness of identifying some Class E(g)(iii) (Light Industrial) use within the land use mix at this Employment Park site allocation, there is also masterplanning and design merit in doing so because light industrial uses generally require smaller units and so encouraging a wider range of building sizes.

However, we do consider the broadening of the acceptable land uses within this allocation to include *Class E(g)(iii)* light industry uses should be controlled to comprise a small proportion of the Employment Park development, to ensure that it does not prejudice meeting the primary strategic B2/B8 needs for development on this site.

On this basis, for the policy's soundness to be more robust, and consistent with LDL's representation on Policy S/DS: Development Strategy, we consider it is necessary to insert an additional sentence within policy S/SHF 6, as follows:

"Class E(g)(iii) (Light Industrial) uses, where the total amount and Class E(g)(iii) (Light Industrial) floorspace does not exceed 30,000 sq m gross."

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Context

Bullet 9 of policy S/SHF states that the development at Land North of A1307, Bar Hill (Slate Hall Farm) must: *"Mitigate the impact of the development on Slate Hall Farm, a potential non designated heritage asset."*

Bullet 16 then states that: *"Slate Hall Farm must be retained as a potential non designated heritage asset."*

This is not consistent with the 2026 HELAA for the site (HELAA Site ID: 05277) which confirms that Slate Hall Farm is not a Non- Designated Heritage Asset, stating:

"The additional information has been assessed, and it is agreed that Slate Hall Farm buildings are not considered to be non-designated heritage assets. Therefore, from a built heritage perspective, the RAG score has been updated to green".

That additional information comprised 'The Slate Hall Farm Building Heritage Appraisal', undertaken by RPS Tetra Tech, 26 January 2026, (at **Appendix 4)** - this originally formed part of our GCLP Reg18 representation, 30 January 2026. For the reasons explained in the statement (pg.2)) it concludes that *"We therefore adjudge the Slate Hall Farm building not to be a non-designated heritage asset."*

More recently, the Greater Cambridge's Conservation Officer has confirmed in their consultation response (dated 04 August 2026) to Outline Planning Application (ref. 26/02534) (at **Appendix 5**), that:

"It had previously been queried whether Slate Farmhouse constituted a non-designated heritage asset (NDHA), however a heritage assessment provided as part of the Local Plan call for site HELAA showed the site had undergone lot of modern development and changes and it is agreed that the building is not considered a NDHA, so can be excluded from the impact assessment."

Accordingly, we consider that bullets 9 and 16 should be deleted to be factually accurate and ensure this policy is justified and therefore sound in accordance with Paragraph 36 (b) of the NPPF 2024. See below:

~~*9 Mitigate the impact of the development on Slate Hall Farm, a potential non designated heritage asset, and its setting.*~~

~~*16 Slate Hall Farm must be retained as a potential non designated heritage asset."*~~

Proposed Clarification Modifications to Policy S/SHF

Introduction

- **Bullet 1**- Below amendment required to remove closed list of who can prepare the Site Wide Masterplan, as this is not justified. For example, it could also be prepared by a developer or prospective occupier(s).

  "A site wide Masterplan will be prepared ~~by the landowners and/or promoters~~ in conjunction with the Council and in consultation with the local community and other stakeholders. The Masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 89 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing

and will be used as a basis for the consideration of subsequent planning applications. The masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the Council).”

Built Form

- **Bullet 13** - Below amendment required to provide a more accurate description of Figure 85- Indicative Spatial Framework for Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm).

  “Focus built form on the north-west and central parts of the site, with the area to the south-east providing substantial green infrastructure, and water management features along the Oakington Brook.”

- **Bullet 14** - Below amendment required to clarify where in the site the building heights need to step down to respond to heritage sensitivity. This would also reflect the Parameter Plan and Design Code for the Outline Planning Application.

  “Management of impact on landscape by ensuring heights are scaled down to the sensitive edges on the western corner of the site, the mass is organised to avoid a ‘block’ effect and sufficient screening is installed.”

- **Bullet 15** - Below amendment to align with NPPF para 215 on the need to balance harm to significant to a designated heritage asset against the public benefits:

  “Through the preparation of a Heritage Impact Assessment, protect as far as possible, and where appropriate, enhance the significance of heritage assets and their setting, including the Grade II The Grange, Grade II Parish Church of All Saints, Lolworth and Grade II 2 and 4 The Green.”*

Movement

- **Bullet 21a -** Replacement of word ‘optimal’ with ‘appropriate and sustainable’, as optimal is undefined and difficult to measure.

  “…the development achieves ~~optimal~~ appropriate and sustainable ~~-~~transport outcomes, including maximising site internalisation and high active and public transport mode shares;”

- **Bullet 21b -** (1) Clarification that trip budget will cover the peak hours of the day for clarity. (2) Removal of requirement that a definitive trip budget needs to be agreed “*prior to submission of the outline application”,* as a vehicular trip budget is normally agreed during the planning application transport assessment process.

  “The quantum and mix of development can be delivered within the agreed vehicular trip budget covering the peak hours of the day. A definitive trip budget based on detailed evidence must be agreed with the Local Highways Authority. ~~prior to submission of the outline application~~ 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.”

Lifespan

- **Bullet 26 -** Clarification:

"In addition to the requirements on the validation checklist, the following will be required at the submission of ~~an outline or~~ a major planning application:

- **Bullet 26 (a, b +g) -** Moved to a new bullet (27) detailing requirements for reserved matters and detailed applications:

  "Reserved matters and detailed planning applications will also be required to submit:

  a A comprehensive environmental management and construction strategy for all phases of development required;

  b Strategies for the long-term management and maintenance of landscape, drainage and green infrastructure; and

  c The approach to the long-term management, maintenance and stewardship of the site, including its infrastructure, services, facilities and built and natural environment, must be identified at the outset through a Management and Maintenance Plan that sets out a comprehensive approach to the long-term management of the site as it evolves."

Proposed Amendments to Supporting Information

Small and Medium Scale Commercial Uses

Policy S/SHF requires *"a flexible range of appropriate units that can support a wide range of businesses and that can be adapted to accommodate changing business requirements within the following uses classes".*

However, the supporting information to the policy, refers to *"…small and medium scale commercial uses…"* when referring to a flexible range. This conflicts with policy, is inappropriate and overly prescriptive in relation to the type and size of units, given the employment need and demand and site suitability for a range including larger units on a strategic site allocation.

The prescriptive approach contradicts both the NPPF 2024 (paragraph 87b) and the NPPF 2026 (Policy E1 2.), as well as the property market needs evidenced in the area (relating to both the Council's evidence, namely the Greater Cambridge Warehouse and Industrial Space Needs Report (2025) and the Market Demand Assessment Chapter of the Cambridge 25 Market Assessment (Savills, May 2026) (at **Appendix 6**).

This report (at paragraphs 6.3.2 to 6.3.5) 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. The key points are:

1 There are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units above 100,000 sqft (Appendix 6, Table 6.1), for example:

  a Cambridge University Press & Assessment (CUPA);

  b Fred Smart Logistics; and

  c Hain Daniels.

2 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 6, Section 6.4.3), Greater Cambridge is considerably under-providing larger scale industrial units. These comparable centres have a far higher representation of larger scale units over 100,000 sq. ft. This is evidential of the supply in Greater Cambridge, having been artificially suppressed relative to comparable locations elsewhere; it also highlights the vital role that such units play enabling the proper function of the I&L market.

3 The last eight years of policy restriction, since the adoption of South Cambridgeshire LP Policy E/11, has severely constrained existing businesses from finding suitable accommodation within Greater Cambridge due to a lack of availability of premises of sufficient scale. Examples include Marshalls, Cambridge Aerospace and DHL (Appendix 6, paragraphs 6.4.6- 6.4.12).

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.

We would finally draw attention to the West Suffolk Local Plan Examination in Public and Inspector's Report (July 2025) (**Appendix 7**), where a similar size unit cap for logistics units was removed (see para 250, repeated below):

We concluded under main issue 1 that there is significant demand for large scale strategic logistics development in the wider sub region, and an identified need for 35 hectares in West Suffolk. The restriction on such developments comprising more than 9,000 sqm is not therefore justified or consistent with national policy which recognises the critical role that such development plays in enabling an efficient, sustainable and effective supply of goods for consumers and businesses as well as contributing to local employment opportunities. Policy SP12 therefore needs to be modified to allow large scale logistics development on suitable allocations and employment areas, provided that it is consistent with national policy and does not prevent more localised needs being met. (Lichfields emphasis).

In comparison, the GCSP evidence in the Iceni report (2025 GC Employment and Housing Needs Update) identifies a minimum need in Greater Cambridge for 317,000 sq m of new B2/B8 Employment floorspace to 2045, with an existing critical undersupply of land and premises to meet the needs of the I&L sector and this is particularly severe in relation to large units (**Appendix 6**, para 5.5.4).

On the above basis, and consistent with LDL's representation on Policy S/DS: Development strategy, we would also seek an amendment to the supporting text to ensure this accords with para 36(d) of the NPPF 2024, as follows:

"The policy enables a range of ~~small and medium scale~~ commercial uses 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~~ unit sizes. ~~Small and medium sized units are defined as less than 9,300 square metres (100,000 square feet).~~ Development should come forward in phases ~~which respond to local needs~~."

Policy S/JH: New Jobs and Homes

Policy S/JH sets out a target of 73,300 jobs over the 2024-2045 period based on the Greater Cambridge Employment and Housing Evidence Update 2025 ('EHNU 2025').

The ENHU 2025 identifies a need for 317,000 sq.m of industrial / warehousing (Use Classes B2/B8) space by 2045, alongside a need for over 302,000 sq.m of office and 600,000 sq.m of R&D space. Building on the jobs forecast, these need figures take into consideration the latest market signals and stakeholder engagement, applying necessary adjustments to inform the employment policy requirements (GCLP paragraph 2.12).

The 317,000 sq.m of industrial/warehousing figure updates the underestimate of floorspace requirements set out in the Council's previous evidence base work (i.e. ELEDS 2020, which only identified up to 60,000 sq.m of industrial and warehousing need over the 2020 to 2041 time period). The revised figures comprise a more reflective estimate of the market activity across the Greater Cambridge 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 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 EHNU 2025 discusses suppressed demand matters and suggests that, if an 8% availability rate was assumed, there would be a higher need for industrial and distribution floorspace of 360,000 sq.m (EHNU, paragraph 5.26).

Whilst the GCLP is being prepared to be consistent with the previous National Planning Policy Framework ('NPPF 2024'), the latest (August 2026) national planning policy framework ('NPPF 2026') is also relevant. This is particularly the case in decision-making, as not only do the NPPF DM policies apply from 17 August 2026, but also: *"Development plan policies which are materially inconsistent with the national decision-making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted or made against this Framework…."* (NPPF, 2026, Annex A, paragraph 2).

NPPF 2026 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 national policy 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 needs arising within Greater Cambridge and is neutral regarding the wider FEMA strategic requirements (Greater Cambridge Warehouse and Industrial Space Needs 2025 para 0.23, which is included in the EHNU 2025 needs figure), there is 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

For this reason and in order to be more effective and to accord with paragraph 36(c) of the NPPF 2024, Policy S/JH should be amended as follows:

"Development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for:

1. *A minimum of 73,300 additional jobs to support the Greater Cambridge's knowledge intensive sectors, and also provide a diverse range of local jobs;"*

Policy S/DS: Development Strategy

Policy S/DS: Development Strategy sets out the proposed spatial distribution of jobs (and housing) growth across the Greater Cambridge 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 and offices sectors, reflective of Greater Cambridge's economy.

Provision Quantum

Nonetheless, a total of 350,000 sq.m of industrial and warehousing space is proposed to be allocated (Policy S/DS 2bi, 2cii, 2ei and 2eii) for industrial and warehousing purposes (B2/B8), alongside an additional 183,800 sq.m for office, research and industrial uses (i.e., Eg/B2/B8) (Policy S/DS 2ci1, 2ci2, 2civ and 2cv), to support the local economy and to accommodate the significant demand for such space as indicated by the Council's evidence. The allocated land purely for office and research & development totals over 1.2m sq.m (i.e. Policy S/DS 2aii, 2bii, 2biv,2ciii,2di and 2dii).

On this basis, the GCLP aims to provide for a higher economic need figure against the 317,000 sq.m minimum requirement for industry and warehousing; 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, total 360,000 sq.m once the recent trends are considered.

Most of this allocation provision (i.e., 310,000 sq.m or 88.5%) is proposed in the 'Rest of the rural area' (Policy S/DS 1e, 2ei and 2eii), with the remaining 40,000 sq.m or 11.5% industrial uses equally divided (20,000 sq.m each) between the edge of Cambridge (Policy S/DS 1b,2bi) and the expanded Cambourne (Policy S/DS 1c,2cii).

The open employment class allocations relate to large residential-led allocations in Cambourne North (Policy S/DS 2ci) of 108,000 sq.m, Cambourne (Policy S/DS 2ci2) of 34,600 sq.m, Waterbeach New Town (Policy S/DS 2civ) of 39,800 sq.m and, finally, in Bourn Airfield new village (Policy S/DS 2cv) of

just 1,400 sq.m. None of these is expected to provide a significant amount of industrial and warehousing space.

Most of the industrial and warehousing supply relates to the proposed Slate Hall Farm site allocation (Policy S/DS 2ei) at Junction 25, A14 (for which LDL is the main promoter and stakeholder), where the new allocation for approximately 220,000 sq.m employment floorspace for industrial and warehousing uses (Policy S/SHF) accounts for some 63 % of the total industrial and warehousing provision. The strategic location and size of the allocation site provides flexibility and choice to meet the needs of the historically under-supplied Greater Cambridge market.

This highlights that the Council recognises that the draft site allocation S/SHF is intended to have a key role as the principal strategic location for 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 can provide 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.

We therefore consider policy S/DS to be sound, save in respect of prescribing the scale of the unit sizes.

Scale and Flexibility

However, Policy S/DS 2ei appears overly prescriptive in terms of unit sizes, given that there is no justification for excluding a wider unit size range that could be provided on this largest and principal site allocation. This should also be aligned with the updated Policy J/NE (8), to allow flexibility for a wider range of unit sizes subject to supporting evidence demonstrating those needs. Indeed, this is essential to achieve the stated aim of the policy, which itself refers to supporting *"the growth of a wide range of different businesses."*

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

The importance of providing for flexibility aligned with market requirements is highlighted in NPPF 2026 Policy E1 point 2, which requires local plans to be flexible in response to the changing commercial property requirements and states in particular that *"…development plans should not be overly prescriptive about the types of uses or unit sizes 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].

Moreover, NPPF 2026 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].

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.

The prescriptive approach also contradicts the property market needs evidenced in the Market Demand Assessment Chapter of the Cambridge 25 OPA Market Assessment (Savills, May 2026) (at **Appendix 6**).

This report (at paragraphs 6.3.2 to 6.3.5) 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. The key points are:

1 There are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units above 100,000 sqft (Appendix 6, Table 6.1), for example:

   a Cambridge University Press & Assessment (CUPA);

   b Fred Smart Logistics; and

   c Hain Daniels.

2 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 6, Section 6.4.3), Greater Cambridge is considerably under-providing larger scale industrial units. These comparable centres have a far higher representation of larger scale units over 100,000 sq. ft. This is evidential of the supply in Greater Cambridge, having been artificially suppressed relative to comparable locations elsewhere; it also highlights the vital role that such units play enabling the proper function of the I&L market.

3 The last eight years of policy restriction, since the adoption of South Cambridgeshire LP Policy E/11, has prevented existing businesses from finding suitable accommodation within Greater Cambridge due to a lack of availability of premises of sufficient scale. Examples include Marshalls, Cambridge Aerospace and DHL (Appendix 6, paragraphs 6.4.6- 6.4.12).

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.

We would finally draw attention to the West Suffolk Local Plan Examination in Public and Inspector's Report (July 2025) (**Appendix 7**), where a similar size unit cap for logistics units was removed (see para 250, repeated below):

We concluded under main issue 1 that there is significant demand for large scale strategic logistics development in the wider sub region, and an identified need for 35 hectares in West Suffolk. The

restriction on such developments comprising more than 9,000 sqm is not therefore justified or consistent with national policy which recognises the critical role that such development plays in enabling an efficient, sustainable and effective supply of goods for consumers and businesses as well as contributing to local employment opportunities. Policy SP12 therefore needs to be modified to allow large scale logistics development on suitable allocations and employment areas, provided that it is consistent with national policy and does not prevent more localised needs being met. (Lichfields emphasis).

In comparison, the GCSP evidence in the Iceni report (2025 GC Employment and Housing Needs Update) identifies a minimum need in Greater Cambridge for 317,000 sq m of new B2/B8 Employment floorspace to 2045 , with an existing critical undersupply of land and premises to meet the needs of the I&L sector and this is particularly severe in relation to large units (**Appendix 6**, para 5.5.4).

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.

Policy Recommendation

Therefore, in order to be justified and accord with paragraphs 36(b) and (d) of the NPPF 2024, and therefore be sound in all respects, Policy S/DS 2e(i) should be amended as follows:

"i. Slate Hall Farm, Junction 25, A14 – an allocation for 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: including approximately 220,000 square metres employment floorspace for industrial and warehousing uses, with a mix of ~~small-medium~~ units~~s~~ sizes to support the growth of a wide range of different businesses;"

Policy J/NE: New Employment Development Proposals

We note that Policy J/NE point 8 in relation to 'large-scale warehousing and distribution facilities' has been altered since Regulation 18 stage so that proposals for strategic scale facilities providing for national or regional needs will not be permitted unless it can be demonstrated that there is an unmet need for such facilities that *"must and can be appropriately provided within Greater Cambridge having regard to other policies and priorities within and arising from the Local plan"*. The supporting text (paragraph 8.17) specifies that 'appropriately met' can mean that the development does not generate traffic movements that impede the delivery of the wider development strategy. It also (paragraph 8.17) specifies units exceeding 9,300 sq.m as the benchmark to be applied for the purposes of interpreting the policy.

From the Council's response document (Consultation Statement, Appendix 12: Response to Representations - Jobs) it is understood that the Council considers that strategic scale logistics

developments would be addressed in the forthcoming SDS (that commences in late 2026), and their neighbouring authorities and those in the relevant functional economic market area (FEMA), have developed a Statement of Common Ground with the Cambridgeshire & Peterborough Combined Authority, which confirms the need to assess strategic warehousing facilities serving national or regional markets across the FEMA.

In general terms, as noted at Regulation 18, LDL does not consider that any policies that seek to be restrictive or reduce flexibility – or overly prescriptive in terms of unit size thresholds – in relation to addressing market requirements or business needs can be justified or effective in policy. This is not consistent with the NPPF 2024 (paragraph 87b) and NPPF 2026 (E1.2). Furthermore, our view is that the implementation of this Plan cannot rely upon a future SDS, which is yet to be developed and with no confirmed timetable for adoption. This would leave a policy vacuum in relation to large-scale needs across the FEMA.

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 national policy.

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, as well as stakeholder engagement (through the Council's evidence, namely the GCW&ISN (Iceni,2025) and the Understanding demand for B8 premises across Greater Cambridge (WSP, 2021), which is also cited within the Council's evidence – i.e., GCW&ISN 2025) highlight the latent demand for larger-scale units in the area. This was also recognised by the Council in the Jobs Topic Paper 2025, paragraph 3.42 (see pg.5).

In addition, recent market evidence from Savills (**Appendix 6 -** paragraphs 6.3.2 to 6.3.5) 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. The key points are:

1 There are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units above 100,000 sqft (Appendix 6, Table 6.1), for example:

   a Cambridge University Press & Assessment (CUPA);

   b Fred Smart Logistics; and

   c Hain Daniels.

2 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 6, Section 6.4.3), Greater Cambridge is considerably under-providing larger scale industrial units. These comparable centres have a far higher representation of larger scale units over 100,000 sq. ft. This is evidential of the supply in Greater Cambridge, having been artificially suppressed relative to comparable

locations elsewhere; it also highlights the vital role that such units play enabling the proper function of the I&L market.

3 The last eight years of policy restriction, since the adoption of South Cambridgeshire LP Policy E/11, has prevented existing businesses from finding suitable accommodation within Greater Cambridge due to a lack of availability of premises of sufficient scale. Examples include Marshalls, Cambridge Aerospace and DHL (Appendix 6, paragraphs 6.4.6- 6.4.12).

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. Continuing to restrict larger units will therefore continue to constrain economic growth.

A policy choice to limit provision for regional (and national) occupiers is not consistent with the NPPF 2024. In particular, NPPF 2024 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 NPPF 2026 gives additional emphasis to meeting regional economic growth (and weight to the future Spatial Development Strategies in plan-making).

NPPF 2026 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.

Moreover, NPPF 2024 paragraph 87b and NPPF 2026 E1.2 aim to allow for flexibility across a variety of scales; NPPF 2026 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 6**) highlight the undersupply of larger industrial and warehousing units in Greater Cambridge.

In addition, the potential consequence of Policy J/NE 8 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.

NPPF 2026 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 NPPF 2026 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 national policy.

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 removed to ensure alignment with the national policy and, more importantly, to serve efficiently the needs of the local market.

Policy Recommendation

Therefore, LDL considers that part 8 of Policy J/NE is not justified and therefore not sound in accordance with paragraph 36(b) of the NPPF 2024; it should therefore be deleted.

As a minimum, the wording should be amended as follows to make clear that it does not apply to allocated sites within the Plan:

"8. Proposals for large scale warehousing and distribution facilities on non-allocated sites providing for national or regional needs will not be permitted unless it can be demonstrated that:…

a. there is an unmet need for such facilities that must and can be appropriately met within Greater Cambridge, having regard to other policies and priorities within and arising from this Plan; and

b. the proposal will not impede delivery of warehousing and distribution and industrial space that meets local market needs in market sector priority locations

Policy J/AW: Affordable Workspace

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

Such a 'universal' policy jeopardises the deliverability of proposed industrial and storage developments, as we set out below. Lichfields have reviewed the Greater Cambridge Local Plan Viability Report, prepared by Aspinall Verdi and published in July 2026. We find that the Report does not provide a reasonable representation of the viability position for all forms of commercial development across the Greater Cambridge area and that it is not possible to reasonably conclude that the requirement for the provision of affordable workspace would not undermine the viability of commercial development in Greater Cambridge.

Our reasoning is provided in **Appendix 7** (below), but we summarise the key arguments below:

1 The assessment of viability is based on the testing of an insufficient number and range of site typologies. Critically, no consideration has been given to the viability implications of large scale industrial and logistics developments such as that envisaged within the proposed 'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)' site allocation in the draft GCLP – i.e. a major employment site of 220,000sqm of B2/B8 use. Nor has consideration been given to other strategic employment site allocation typologies.

2 The assumptions that have been applied in respect of costs are inadequate as they:

a Under-estimate construction costs;

b Fail to make any provision for external and abnormal costs; and,

c Under-estimate contingency costs.

3 The assumptions that have been made in respect of rental value and yields overestimate the gross development value of industrial development.

The implication of these shortcomings is that it is not possible to reasonably conclude that the requirement for the provision of affordable workspace would not undermine the viability of commercial development in Greater Cambridge. We do not consider that Policy J/AW limb 2 is justified, as it is not based on clear and proportionate evidence; it also fails to have regard to reasonable alternatives. In addition, we consider that the policy is not effective, as it would undermine significantly the deliverability of commercial development.

Iceni's Greater Cambridge Affordable Workspace Study (June 2026) ('GCAW 2026') underpins this policy. The evidence highlights that there is justification for policy intervention, given that there are smaller businesses, scale-ups, creative industries and certain industrial occupiers that need to be accommodated according to the business profile of the area.

GCAW 2026 makes it clear that affordable workspace requirements should be tailored to the different market conditions across Greater Cambridge rather than applying a single approach everywhere (para 9.1.2). The evidence states clearly that those requirements are most acute in the central locations and particularly in the established innovation clusters, with needs for affordable office and R&D workspace as part of major office and R&D and mixed-use developments in those locations.

GCAW also states clearly (para 9.1.5) that, particularly for the industrial market, a distinct policy approach in relation to affordable space will be required to reflect the fact that the market is comprised of a number of sub-sectors with different locational and space need requirements which are not currently appropriately reflected in the supporting viability. With respect to large industrial and logistics developments it is also stated (para 9.1.5):

"…However, large industrial and logistics developments are often located in areas that are less suitable for managed affordable workspace provision."

It is, therefore, clear that the draft Policy J/AW limb 2 contradicts the GCLP's evidence base, which highlights that the provision of affordable workspace could not be 'suitable' on large industrial and warehouse development sites. There is a clear misinterpretation of the draft Policy J/AW limb 2 that the affordable workplace needs would be accommodated in large industrial and logistics developments, as these are not the locations where the affordable workspace is actually needed, which, according to the

evidence (GCAW para 9.1.9) is required within Cambridge City and the city fringe locations. The implication of adopting such a policy on large industrial and logistics sites risks the potential for inefficient use of space if affordable workspace is not taken up.

Synthesising the above, neither the Council's evidence nor the viability review demonstrates that a universal minimum of 10% of net additional floorspace as affordable workspace (GIA), at a minimum of 20% below prevailing market rents in perpetuity in industrial and storage developments of over 2,500 sq.m is sound.

Policy Recommendation

Delete limb 2 policy J/AW:

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

Policy J/EP: Supporting of a Range of Facilities in Employment Parks

LDL notes Policy J/EP and endorses the principle of appropriately scaled facilities being supported in business parks and employment areas. This would include Cambridge 25.

LDL notes this is a closed list of facilities, and therefore in order for Policy J/EP to be more 'justified' in accordance with NPPF para 36(b), it is requested that the list of activities in the policy is aligned with para 8.47 of the supporting text which includes additional activities such as 'changing and childcare facilities. Accordingly, LDL request the policy is amended as follows:

"Appropriately scaled facilities including cafes, restaurants, convenience shop, indoor and outdoor social spaces and leisure and sports facilities, changing and childcare facilities, green spaces, ~~eating, social~~ and collaboration and networking spaces will be supported in business parks and employment areas where…"

Alternatively, and to ensure such policy is flexible enough to accommodate market changes (like we saw in COVID), the policy wording could be amended to include "for example" after "including" to identify this is not a closed list.

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 sound and consistent with paragraph 36 of the NPPF (2024).

Policy CC/NZ: Net Zero Carbon New Buildings

'Policy CC/NZ: Net zero carbon new buildings' states (at 1.) that *"New development (with the exception of householder applications) 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 (e.g. energy intensive industries or where sustainable generation may exist nearby) and/or an alternative off-site solution may be preferable.

In order for Policy CC/NZ to be 'effective' in accordance with Para 36 of the NPPF (2024), LDL considers the below amendments to the wording of limb 1. should be introduced to allow flexibility, where it can be justified:

"Where appropriate (with the exception of householder applications) 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."

This requested amendment for flexibility was also raised by LDL at Regulation 18 stage. It was identified and recognised by the GCSP as a Main Issue in the 'Summary of Main Issues' to Policy CC/NZ (pgs. 49-50) of the 'Consultation Statement Appendix 8: Response to Representations- Climate Change' but then the GCSP was silent on this matter in the subsequent 'Response to the main issues raised in representations' (pgs. 51-54).

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 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]*

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The NPPF para 187a only requires that 'valued landscapes' are protected and enhanced (i.e. not conserved) and that this is not the same as 'local landscape character'. GCSP acknowledge in the 'Consultation Statement Appendix 11: Response to Representations- Great Places(pg.87) that *"… there are no defined valued landscapes within Greater Cambridge…"*.

The NPPF 2026 Policies N1 and N2 do not mandate a particular level of protection but require assessment when identifying opportunities for improving the natural environment and when providing safeguards.

For 'local landscape character', NPPF para 187b is most relevant, for which the policy requirement is to *"recognise the intrinsic character and beauty of the countryside"*.

Instead, GCSP make the case in the 'Consultation Statement Appendix 11: Response to Representations- Great Places(pg.88) that "*the intention of the policy to protect, conserve and enhance local landscape character is in line with NPPF section 12 on achieving well-designed places, which says that planning policies and decisions should ensure that developments 'are sympathetic to local character and history"*.

We do not agree that NPPF para 187b has been considered appropriately.

Therefore, Policy GP/LC is not consistent with national policy as required at paragraph 36(d) of the NPPF (2024). In order to make Policy GP/LC sound, LDL considers the below amendments to Policy GP/LC are required:

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;"

Concluding Remarks

We trust that the above LDL policy representations, in particular the rationale provided for the amendments recommended, assists GCSP and the Greater Cambridge Councils to finalise the GCLP for submission to the Secretary of State.

Yours faithfully

[redacted]

Steven Butterworth
Senior Director
BA (Hons) BPl MRTPI

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Annex 1: Recommended Changes to Policy S/SHF: Land North of A1307, Bar Hill (Slate Hall Farm)

Recommended Changes to Policy S/SHF: Land North of A1307, Bar Hill (Slate Hall Farm)

LDL Team changes shown by ~~strikethrough~~ (deletes) and underlined (new) red text

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

1 *A site wide Masterplan will be prepared ~~by the landowners and/or promoters~~ in conjunction with the Council and in consultation with the local community and other stakeholders. The Masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 89 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the Council).*

2 *Given the scale and long term construction of the development, a site wide Design Code must be submitted alongside the Masterplan. This will set the overarching design and placemaking objectives and principles, ensuring that each phase of future development positively contributes towards the high quality outcomes expected.*

Objectives and place identity

3 *Land North of A1307, Bar Hill (Slate Hall Farm) will be a 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. It will provide a range of logistics and industrial uses which can support the long-term needs of residents and businesses in Greater Cambridge.*

4 *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.*

5 *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 design of the development will respond to its landscape setting in terms of the height, design and placement of buildings.*

Uses

6 *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 220,000 metres square (GIA) of commercial uses providing a flexible range of appropriate units 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);*

c *Class E(g)(iii) (Light Industrial) uses, where the total amount and Class E(g)(iii) (Light Industrial) floorspace does not exceed 30,000 sq m gross;*

d *Supporting amenities to meet the needs of staff; and*

e *The development capacity of the site must be established though a landscape-led masterplan process.*

The development of Land North of A1307, Bar Hill (Slate Hall Farm) must do the following:

Context

7 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*

8 *Retain and respond to the setting of Oakington Brook and its associated flood zone by including substantial areas for green infrastructure and water management.*

~~9 *Mitigate the impact of the development on Slate Hall Farm, a potential non-designated heritage asset, and its setting.*~~

10 *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.*

11 *Maintain the usability of the bridleways which run through and around the site.*

Built form

12 *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 impacts on key views and vistas; and*

ii *Ensuring high-quality design of buildings, including through use of appropriate materials and colour palettes*

13 *Focus built form on the north-west and central parts of the site, with the area to the south-east providing substantial green infrastructure, and water management features along the Oakington Brook.*

14 *Management of impact on landscape by ensuring heights are scaled down to the sensitive edges on the western corner of the site, the mass is organised to avoid a 'block' effect and sufficient screening is installed.*

15 *Through the preparation of a Heritage Impact Assessment, protect as far as possible, and where appropriate, enhance the significance of heritage assets and their setting, including the Grade II The Grange, Grade II* Parish Church of All Saints, Lolworth and Grade II 2 and 4 The Green.*

~~*16 Slate Hall Farm must be retained as a potential non-designated heritage asset.*~~

Public Sector

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

Nature

18 *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.*

19 *Protect, positively plan for and deliver dark corridors for bats and other nocturnal 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

20 *Secure active travel and public transport improvements to support first occupation of the site, ensuring sustainable access to the site for workers and local residents by walking, wheeling, cycling and public transport, and that the site integrates successfully with the highways network, by:*

a *Contributing to and enabling new and improved active travel infrastructure and delivering a Mobility Hub to maximise sustainable methods of travel to, from and around the site, providing improved connectivity from Cambridge, Northstowe and the planned allocation at Cambourne North and other nearby villages including Oakington, Bar Hill, Girton and Histon and Impington;*

b *Contributing to a package of bus service improvements to serve the site, including associated infrastructure enhancements and off-peak services to cover shift patterns, with connections to nearby railway stations, mobility hubs, Cambridge, Cambourne (including the planned allocation at Cambourne North), Northstowe, St Ives and other nearby villages;*

c *Maximising opportunities for sustainable last mile deliveries through cargo bikes, e-vehicles and other sustainable modes; and*

d *Providing safe and adequate road access to the site from the Strategic Road Network, including any off-site highways mitigations and junction improvements where required and measures necessary to minimise the impact of HGVs on local communities.*

21 *The agreed masterplan and Transport Strategy for the site must demonstrate how:*

a *the development achieves ~~optimal~~ appropriate and sustainable transport outcomes, including maximising site internalisation and high active and public transport mode shares;*

b *The quantum and mix of development can be delivered within the agreed trip budget covering the peak hours of the day. A definitive trip budget based on detailed evidence must be agreed with the Local Highways Authority. ~~prior to submission of the outline application~~ 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.*

22 *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, Local Planning Authority and National Highways. This must include making financial contributions towards and, as appropriate, enabling any other transport measures necessary to make the development of the site acceptable in transport terms, as evidenced at planning application stage, including:*

a *Sustainable and public transport measures;*

b *Vehicular transport measures, including site access arrangements;*

c *A Traffic Management Plan, including a routing plan and appropriate enforcement measures;*

d *Infrastructure costing and delivery phasing; and*

e *Mechanisms for delivery, monitoring and review including potential delivery through Section 106 obligations, or CIL or other appropriate funding mechanisms.*

Resources

23 *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. The FRA must including modelling of Oakington Brook. No development should be located within 8m of Oakington Brook apart from permitted access.*

24 *Provide appropriate space for the ongoing maintenance of the watercourses.*

25 *Planning conditions will be imposed to minimise the adverse effects of construction activity on the amenity of nearby communities and the environment.*

Lifespan

26 *In addition to the requirements on the validation checklist, the following will be required at the submission of any ~~n outline or~~ a Major planning application:*

~~*a A comprehensive environmental management and construction strategy for all phases of development required, will be conditioned; and*~~

~~*b Strategies for the long-term management and maintenance of landscape, drainage and green infrastructure*~~

c *A more detailed Heritage Impact Assessment;*

d *A desk based Archaeological Assessment;*

e *Landscape and Visualisation Assessment; and*

f *A strategic and local transport mitigation plan (in consultation with the Local Highways Authority and Local Planning Authority).*

27. *Reserved matters and detailed planning applications will also be required to submit:*

a. *A comprehensive environmental management and construction strategy for all phases of development required;*

b. *Strategies for the long-term management and maintenance of landscape, drainage and green infrastructure; and*

c. *The approach to the long-term management, maintenance and stewardship of the site, including its infrastructure, services, facilities and built and natural environment, must be identified at the outset through a Management and Maintenance Plan that sets out a comprehensive approach to the long-term management of the site as it evolves.*

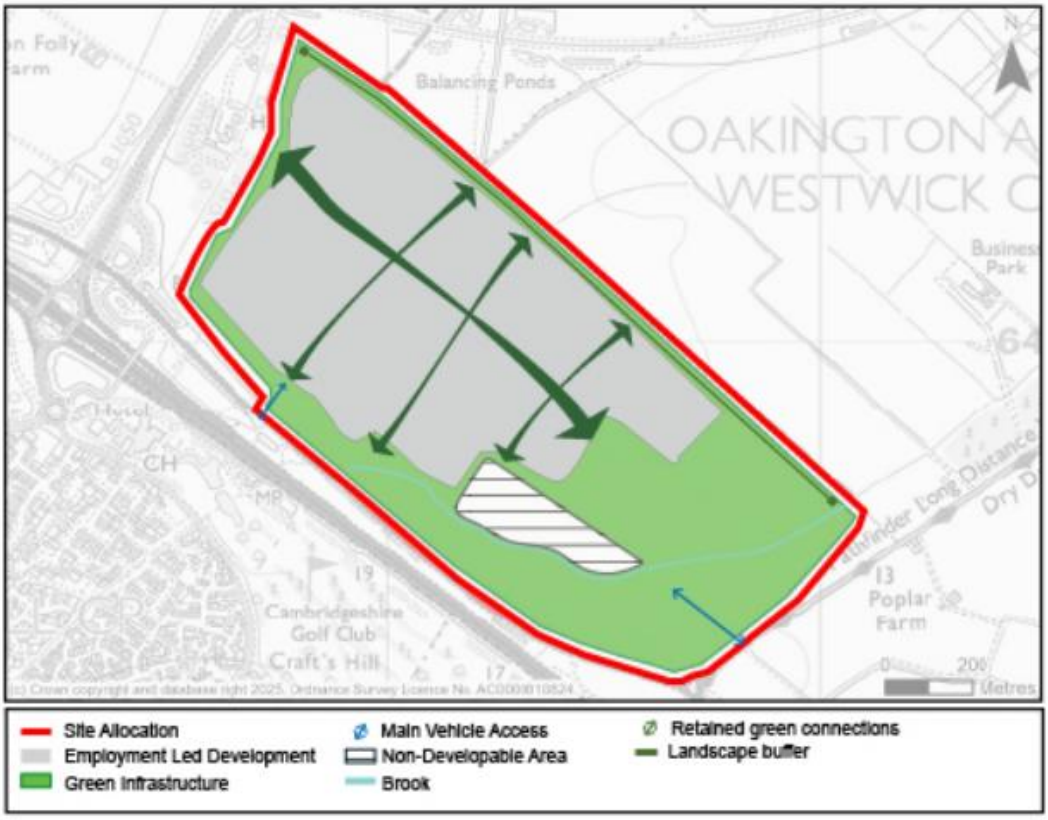


Figure 85: indicative Spatial Framework for Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

Supporting information

- *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.*
- *The policy enables a range of ~~small and medium scale~~ commercial uses 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~~ unit sizes. ~~Small and medium sized units are defined as less than 9,300 square metres (100,000 square feet).~~ Development should come forward in phases. ~~which respond to local needs.~~*
- *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.

- *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.*
- *The southeastern part of the 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 and central parts of the site.*
- *Monitoring will ensure full accountability and if necessary further mitigation, or refocussed mitigation which may be needed to ensure that overall compliance with the trip budget is achieved. The full detail of these mechanisms will be established in the s.106 obligations entered into on the grant of outline consent.*

LICHFIELDS

Appendix 1: Outline Planning Application (ref.26/02534) Schedule of Submission Documents and Drawings. As well as Sharepoint link to application submission Submission. Note application submission can also be downloaded on planning register (26/02534/OUT).

planningprospects
planning and development consultancy

Greater Cambridge Shared Planning Service
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

30 June 2026

Dear Sir, Madam

OUTLINE PLANNING APPLICATION FOR DEVELOPMENT OF UP TO 230,000m² GIA OF EMPLOYMENT FLOORSPACE (WITHIN USE CLASSES E(g)(i), E (g)(ii), E(g)(iii), B2, and B8) TOGETHER WITH SUPPORTING COMMUNITY AND AMENITY SPACE (WITHIN USE CLASSES F1, F2, E(a), E(b), E(d), and E(f); NATURE PARK AND BIODIVERSITY ZONE; SERVICE YARDS AND PARKING AREAS; FORMATION OF PRIMARY MEANS OF ACCESS; ASSOCIATED LANDSCAPING, EARTHWORKS, DRAINAGE AND OTHER ASSOCIATED WORKS WITH ALL MATTERS RESERVED EXCEPT FOR THE PRINCIPAL MEANS OF VEHICULAR ACCESS.
APPLICATION ON BEHALF OF LOLWORTH DEVELOPMENTS LTD AND WELNEY FARMS PROPERTY LIMITED

Planning Prospects Ltd have been instructed by Lolworth Developments Ltd and Welney Farms Property Ltd ("the Applicants") to submit a planning application to South Cambridgeshire District Council (''SCDC'', ''the Council'') in relation to proposals for the development of a site on land east of junction 25 of the A14, between Bar Hill and Northstowe, in South Cambridgeshire (''the Site''). The scheme is to be known as "Cambridge 25".

The application has been submitted in outline, with all matters reserved except for the principal means of vehicular access. Planning permission is sought for the development of up to 230,000m² GIA of employment floorspace (within Use Classes E(g)(i), E(g)(ii), E(g)(iii), B2, and B8) together with supporting community and amenity space (within Use Classes F1, F2, E(a), E(b), E(d), and E(f); nature park and biodiversity zone; service yards and parking areas; formation of primary means of access; associated landscaping, earthworks, drainage and other associated works (outline, with all matters reserved except for the principal means of vehicular access to the site) (''the Proposed Development'').

The application has been submitted via the Planning Portal under reference PP-15009136. It is supported by drawings and reports which are listed in the schedule appended to this letter. An Environmental Impact Assessment (EIA) has also been undertaken. This is reported in an Environmental Statement (ES) that has been submitted with the application. It is informed by a Scoping Opinion initially issued by GCSPS on 14th October 2025 and subsequently updated on 8th April 2026 to reflect a revised application boundary. The application fee of £213,860.00 (inc. VAT and service charge) based the Site area of 103.3 hectares has been paid via the Planning Portal.

In making the planning application it is our submission that the proposal represents a high quality, sustainable development. The Proposed Development will provide significant benefits and there are compelling grounds to grant planning permission, noting that:

The site forms a very substantial part of a proposed strategic employment allocation in the draft Local Plan (Regulation 18). This is under draft Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm) for approximately 240,000m² of employment floorspace with ancillary uses.

This application seeks to advance the Proposed Development on the majority of the draft policy allocation, on the land which is under the control of the Applicants. It demonstrates the Site is suitable, available and deliverable for the development in line with the draft allocation. It also supports the future development of the remaining wider allocation.

The Proposed Development will positively contribute to the supply of industrial and logistic floorspace, on a strategic scale, and where a substantial need is identified in the emerging Greater Cambridge Local Plan (GCLP). The Applicants have undertaken an assessment of the need and this is set out in the submitted supporting Market Assessment. This is a significant and material planning benefit in favour of the proposal.

The proposals represent substantial investment into the district and will generate considerable job opportunities. The Proposed Development will provide for high-quality employment floorspace which meets the modern-day needs of the industrial and logistics sector. Flexibility is provided in the range of uses sought for the employment premises. This is to respond to the requirements of any future occupiers. Ancillary community and amenity uses are also proposed.

Moreover, the proposals include considerable enhancements to green infrastructure including a biodiversity zone, plus a significant area for a nature park which would be accessible for employees and visitors at the employment premises as well as the general public.

The Site is a suitable location for the type and scale of development proposed. The centre of Cambridge is located approximately 8.9 km to the south-east, and the Site is the closest area of non-greenbelt land to the city in this direction. The Site is also close to a strategic road network along with a substantial pool of existing workforce. Moreover, it is accessible by a range of sustainable travel modes. Two principal access points are proposed from the A1307. Full details of these are provided for approval at this stage. These access points will connect to the internal road infrastructure within the scheme.

A parameters-based approach has been followed in defining the nature and extent of the Proposed Development. This approach is landscape-led with a focus on Green Infrastructure and is expressed on the submitted Parameters Plan and complementary Landscape Parameters Plan.

The Parameters Plan defines extensive areas of landscape infrastructure which include the retention of existing mature woodland belts and dark corridors as well as proposed landscaping. A large area to the eastern part of the site will provide for a nature park, including pedestrian and cycle routes and key drainage infrastructure. The area to the south-east is reserved for a biodiversity zone providing ecology mitigation and contributions towards the overall biodiversity net gains across the scheme (in excess of 20%). These features are expressed more fully on the complementary Landscape Parameter Plan.

Careful consideration has been given to ensure that a high-quality employment scheme can be delivered. The supporting Design and Access Statement (DAS) discusses the influences directing the

evolution of the Proposed Development and the underpinning key design principles. The DAS explains how these have been developed and informed by the suite of technical supporting information. It also demonstrates that key consideration has been given to the site constraints, surrounding uses and built environment.

Development zones have been defined to show the extent of the developable area for buildings together with their associated access, service and parking areas, landscaping and drainage infrastructure. Maximum building height parameters have also been identified for each of the development zones to align with the modern requirements of the industrial and logistic sector. It also responds to the nature of the site with lower heights in more sensitive areas.

A Design Code has been prepared following detailed discussion with Officers and is also submitted as part of the planning application. This provides a set of design requirements for the future detailed phases of development. Furthermore, an Illustrative Masterplan shows one way the development could be delivered in line with the parameters and Design Code. This confirms the proposed parameters are achievable and would deliver a high-quality scheme which is appropriate for the location and setting of the Site. It also demonstrates how the proposals could facilitate the wider draft policy allocation coming forwards.

The application is supported by a Lighting Strategy plan and Utilities Strategy Plan. The Lighting Strategy illustrates that there will be no negative impact on ecology or the amenity of neighbouring properties. The utilities strategy demonstrates how, electricity, water and telecommunications will be provided in principle. A Sustainability Statement and Energy Strategy has also been submitted.

A Flood Risk Assessment (FRA) has also been prepared. The FRA confirms that the Site is suitable for development, with a low residual risk of flooding. It also demonstrates that the proposals will not increase the risk of flooding either on site or off-site. Moreover, the proposed Drainage Strategy includes a range of SuDS measures to store rainwater and reduce runoff. The Nature Park across the southern part of the Site will play an important role as a natural flood management area, providing controlled storage during extreme events for Oakington Brook and reducing peak flows. The analysis shows that the greenfield discharge rate from the Site will be significantly restricted through the Proposed Development to both of the relevant watercourses (Longstanton Brook and Oakington Brook).

Other site-specific development issues have been appropriately addressed including matters such as access and traffic, protection of ecological interests, consideration of air quality and noise impacts. These aspects have influenced the development parameters.

In summary:

The Proposed Development corresponds with the economic role of sustainable development. It represents significant inward investment into the district, delivering new industrial and logistics floorspace to meet an identified need. The Proposed Development will make efficient use of a site with a draft allocation for employment, and provide high quality, sustainable industrial and logistics floorspace which meets modern-day needs.

It will create opportunities for new businesses to locate within Greater Cambridge, while enabling existing business to expand and remain within the region. Thereby, it will contribute to a strong, responsive, and competitive economy by delivering significant job opportunities during both the construction and operational phases.

The Proposed Development accords with the social role of sustainable development. It will contribute to a strong, vibrant and healthy community through the provision of a wide range of employment opportunities within a high-quality development that is close to existing homes. It will also provide a range of supporting amenity and community uses, significant enhancements to green infrastructure, and a publicly accessible nature park.

The Proposed Development accords with the environmental role of sustainable development. It seeks to protect and enhance the local natural environment, enhance biodiversity, managing surface water via sustainable drainage designs, promote sustainable travel and mitigate against climate change.

I trust the application is complete and can be acknowledged and registered. Should you require any further information or clarification, please do not hesitate to contact me

Yours faithfully



Claire Taylor - MRTPI, Principal Planner
For and on behalf of Planning Prospects Ltd

Land East of A14 Junction 25: Proposed Industrial & Logistics Development "Cambridge 2
Schedule of Submitted Drawings and Reports - 30th June 2026 (1

Proposal - Outline planning application for employment development, all matters reserved save for main points of vehicular ac

Drawings (2)

Number	Revision	Name	Scale	Author
Site / General				
4585-CA-00-00-DR-A-00100	PL14	Site Location Plan*	1:2500	Chetwoods
4585-CA-00-00-DR-A-00111	PL1	Existing Site Layout Plan (inc. PROW)	1:3000	Chetwoods
Proposal				
4585-CA-00-00-DR-A-00106	PL18	Development Parameters Plan*	1:2500	Chetwoods
X9531-FPCR-XX-XX-DR-L-0003	P10	Indicative Landscape Strategy Plan	nts	FPCR
X9531-FRCR-XX-XX-DR-L-0002	P05	Landscape Parameters Plan*	nts	FPCR
4585-CA-00-00-DR-A-00102	PL13	Illustrative Masterplan	1:2500	Chetwoods
Infrastructur				
184265/A/14	n/a	A1307 Northern Site Access & Spur Signals Modification (Preliminary Layout)*	1:500	SLR / KMC
184265/A/013	n/a	A1307 Southern Site Access (Preliminary Layout)*	1:500	SLR / KMC

Reports / Other

Reference	Revision	Name	Author
Planning			
		Application Form	PPL
		Certificate / Notices	PPL
		Covering Letter	PPL
		Schedule of Submitted Documents	PPL
		Payment	Applicant
Supporting			
		Planning Statement	PPL
		Statement of Community Involvement	Camargue
Pt 1 & Pt 2 - June 2026	PL1	Design and Access Statement with Waste Management	Chetwoods
June 2026	PL1 - Rev 9	Design Code	Chetwoods
333702184-STN-ZZ-ZZ-DR-ME-4000	P01 (2026.06.22)	Utilities Strategy Plan	Stantec
333702184-STN-ZZ-ZZ-DR-E-3000	P01 (2026.06.22)	External Lighting Strategy Plan	Stantec
May 2026		Market Assessment	Savills
333702184-P01-S2	P01 (2026.06.22)	Energy and Sustainability Statement	Stantec
30510215/1	1	Phase I Geo-Environmental Desk Study	MJM
333702184	Rev 01	Health Impact Assessment	Stantec
		BNG Report (provided at ES Appendix 7.9)	FPCR
		BNG Statutory Metric (provided at ES Appendix 7.9A)	FPCR
ES			
		ES Volume 1 - Text	
		1 Introduction	SLR
		2 Site Description	SLR
		3 Development Description	SLR
		4 Approach and Scope	SLR
		5 Consideration of Alternatives	SLR
		6 Traffic and Movement	SLR / KMC
		7 Ecology	FPCR
		8 Landscape and Visual	FPCR
		9 Cultural Heritage	RPS TetraTech
		10 Air Quality	Sharps Redmore
		11 Noise & Vibration	Sharps Redmore
		12 Water Resources & Flood Risk	Stantec / MJM
		13 Soils & Agricultural Land	SLR
		14 Socio-Economics	Savills
		15 Climate Change	Stantec
		16 Summary of Residual and Cumulative Effects	SLR
		Statement of Expertise; Reference List; Glossary; Next Steps	SLR
		ES Volume 2 - Appendices	*Authors as Above*
		Appendix 1.1: Site Location Plan	
		Appendix 1.2: Parameters Plan	
		Appendix 1.3: Illustrative Masterplan	
		Appendix 4.1: Scoping Report	
		Appendix 4.2: Scoping Opinion	
		Appendix 6.1: Transport Assessment	
		Appendix 6.2: Site-wide Framework Travel Plan	
		Appendix 7.1: Relevant legislation, policy and guidance	
		Appendix 7.2: Assessment Methodology	
		Appendix 7.3: Badger Survey Report (Confidential)	
		Appendix 7.4: Bat Survey Report	
		Appendix 7.5: Bird Survey Report	
		Appendix 7.6: Invertebrate Survey Report	
		Appendix 7.7: Reptile Survey Report	
		Appendix 7.8: Riparian Mammal Survey Report	
		Appendix 7.9: Biodiversity Net Gain Report	
		Appendix 7.9a: Biodiversity Net Gain Metric	
		Appendix 7.10: Arboriculture Report	
		Appendix 8.1: Policy Planning	
		Appendix 8.2: LVIA - Methodology & Assessment Criteria	
		Appendix 8.3: Landscape Character	
		Appendix 8.4: Figures	
		Appendix 8.5: Zone of Theoretical Visualisation	
		Appendix 8.6: Photomontages	
		Appendix 8.7: Landscape Effects Table	
		Appendix 8.8: Visual Effects Table	
		Appendix 8.9: Indicative Landscape Strategy	
		Appendix 9.1: Archaeological Desk based Assessment	
		Appendix 9.2: Geophysical Survey Report	
		Appendix 9.3: Geophysical Survey Report	
		Appendix 9.4: Geophysical Survey Report	
		Appendix 9.5: Archaeological Interim Statement	
		Appendix 10.1: Legislation, Policy and Guidance	
		Appendix 10.2: Consultation	
		Appendix 10.3: Construction Fugitive Dust Assessment	
		Appendix 10.4: Air Quality Dispersion Modelling Inputs	
		Appendix 10.5: Air Quality Assessment Figures	
		Appendix 11.1: Legislation, Policy and Noise Guidance	
		Appendix 11.2: Survey Results	
		Appendix 11.3: Construction Calculations	
		Appendix 11.4: Sound Plan Input Assumptions	
		Appendix 11.5: Sound Plan Results	
		Appendix 11.6: Change in noise level Operational Traffic (dB)	
		Appendix 12.1: Flood Risk and Drainage Strategy	
		Appendix 13.1: Relevant legislation, policy and guidance	
		Appendix 13.2: Agricultural Land Classification	
		Appendix 15.1: Policy and Legislative Context	
		ES Non-Technical Summary	

1 Submitted on-line. Planning Portal Ref:PP15009136
2 Drawings for approval marked *

LICHFIELDS

Appendix 2: Recommended Changes to HELAA Assessment (HELAA Site ID-40248) for the Cambridge 25 Application Site

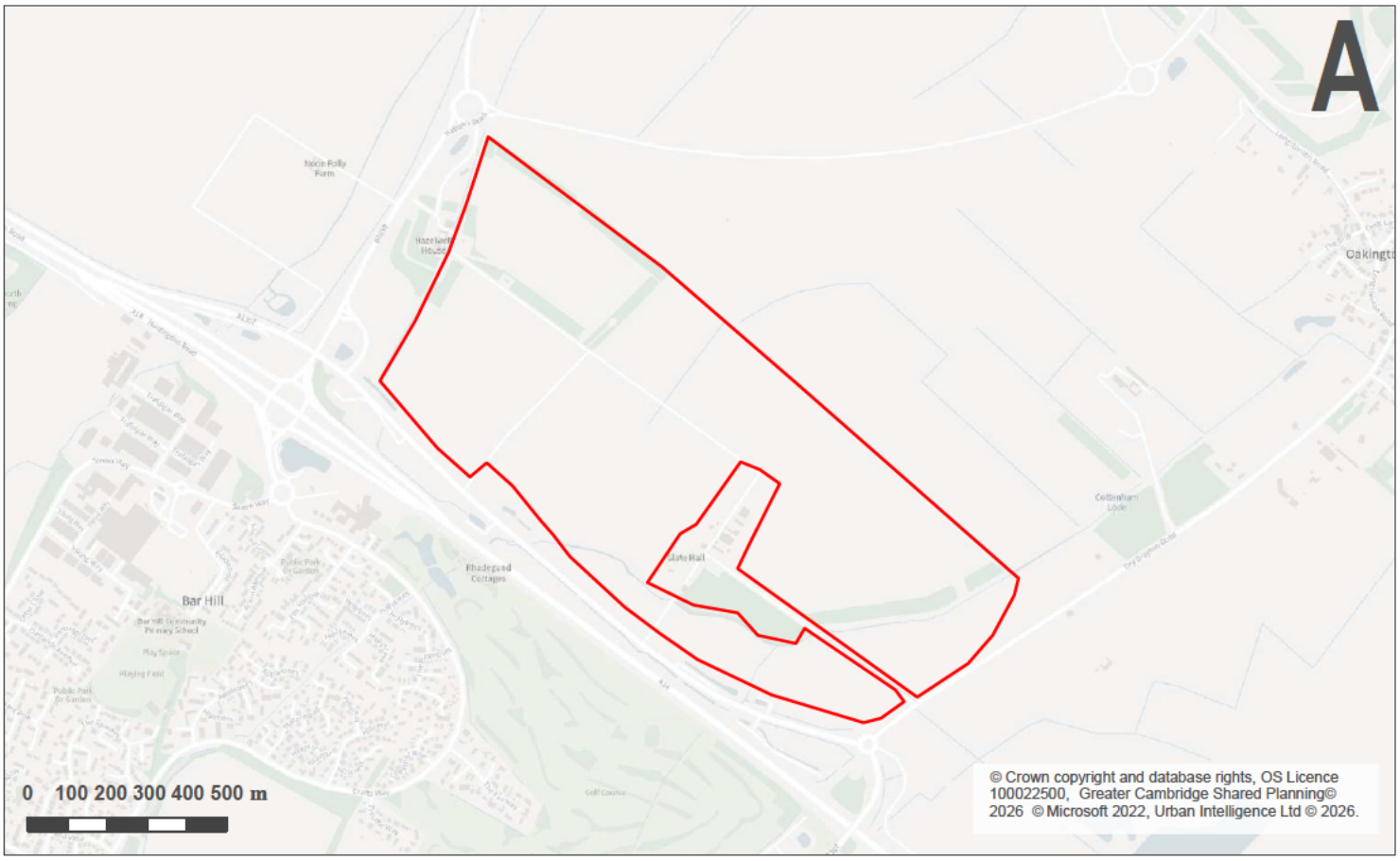
LDL GCLP Reg19 Representation – LDL HELAA Update for Cambridge 25 site within allocation S/SHF **[Appendix 2]**

(**Note 1-** All LDL comments relate to the Cambridge 25 site only (HELAA Site ID- 40248- 'C25 HELAA'), drawing on the assessments forming part of the outline planning application('OPA') (ref. 26/02534/OUT) submission.

Note 2 - For completeness and where stated, we have copied GCSP commentary from the allocation wide HELAA (HELAA Site ID- 05277 'Allocation HELAA') (this is clearly identified)

Note 3- All Greater Cambridge HELAA commentary prior to 2026 has been grey shaded for ease of reading.)

Land at Junction 25 of A14, Bar Hill



A map of Land at Junction 25 of A14, Bar Hill

Site information	
Site ID	115165
HELAA Site ID	40248
Suitable Site Area (ha)	100.59
Ward/Parish	Longstanton
Greenfield or Previously Developed?	Greenfield
Category of site	Dispersal: Villages / Transport Corridor
Category of settlement	Not within or adjacent to an existing settlement

Current use(s)	Agricultural Land / Building
Proposed development	Non-Residential
Proposed employment floorspace (m2)	70000- 260000
Proposed residential capacity	0
Suitability	
Adopted Development Plan Policies RAG 2026	C25 HELAA- **Amber** LDL Assessment- **Amber**

Adopted Development Plan Policies Comment 2026	C25 HELAA Development of the site has some potential policy constraints, but these could be overcome through the planning application process.
Flood Risk RAG Assessment 2026	C25 HELAA- **Amber** LDL Assessment- **Green**
Flood Risk Officer Comment 2026	C25 HELAA Flood Zones: 4% is in Flood Zone 2. 3% is in Flood Zone 3. Climate Change: 8% is in a climate-change-adjusted flood zone. Surface Water: 5% lies in a 1-in-1,000-year event. 2% lies in a 1-in-100-year event. 3% lies in a 1-in-30-year event. LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**] includes an Environmental Statement which includes Chapter 12: Water Resources and Flood Risk and appendix 12.1. Section 6.7 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *"The Environment Agency flood maps show small areas of flood zone 2 and 3 (areas of medium to high risk of flooding) each side of the Oakington Brook on the Site. All proposed buildings and hardstanding areas of the Proposed Development are positioned well away from these areas in flood zone 1 (low flood risk). Fluvial flooding only occurs in close vicinity to the brook and in areas designated for landscaping and wetland / attenuation features. Therefore, the risk of fluvial flood to the Proposed Development is considered very low.* *The Site has been identified as being within an area of serious water stress. To mitigate the impact, it is proposed that the Proposed Development meets the BREEAM 'Excellent' standard for water consumption.* *Potential impacts with respect to construction and operational phases of the Proposed Development have been assessed. Following mitigation measures being implemented, there will be no significant effects in regard to water resources and flood risk."*

Flood Risk RAG Assessment 2025	Amber
Flood Risk Officer Comment 2025	Based on the information provided, the site assessment scoring remains as Amber. Whilst a proportion of the site is within flood risk zone 1, the site contains an area at high risk of fluvial and surface water flooding around Oakington Brook. Additionally the hydraulic modelling information referenced was not supplied to the LPA so we are unable to verify its suitability. Flood Zones: Partially in Flood Zone 2 (4%). Partially in Flood Zone 3 (3%). Surface Water Flooding: 3% lies in a 1 in 30 year event. 2% lies in a 1 in 100 year event. 5% lies in a 1 in 1000 year event.
Flood Risk RAG Assessment 2023	Amber
Flood Risk Officer Comment 2023	A response to HELAA assessment Proposed Development at Slate Hall Farm, Barhill, Cambridge by MJM consulting engineers. Based on this new information, the site assessment scoring remains as Amber. Whilst a proportion of the site is within flood risk zone 1, the site contains an area at high risk of fluvial and surface water flooding around Oakington Brook. Additionally the hydraulic modelling information referenced was not supplied to the LPA so we are unable to verify its suitability.
Flood Risk RAG Assessment 2021	Amber
Flood Risk Officer Comment 2021	The site is within flood zones 3a or 3b.
Landscape RAG Assessment 2026	C25 HELAA- Silent Allocation HELAA- **Amber** LDL Assessment- **Green**
Landscape Comment 2026	<u>C25 HELAA</u> Silent <u>Allocation HELAA</u> New supporting information and representations from the developer has been submitted including detailed comments on the wording of the allocation policy and other relevant policies in the draft local plan. The new information doesn't change the landscape assessment which remains amber. <u>LDL Assessment</u> The application submission (ref. 26/02534/OUT) [**Appendix 1**] includes an Environmental Statement which includes Chapter 8: Landscape & Visual and appendices 8.1 – 8.9). Section 6.3 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *"The Greater Cambridge Landscape Character Assessment (GCLCA) shows the Site within Landscape Character Area (LCA) 2A 'Longstanton Fen Edge Claylands'. The Site and its wider landscape context are not subject to any national, local or other landscape designations.* *PRoW within and around the Site include: bridleway Longstanton 10; bridleway Longstanton 15 and Oakington & Westwick 9; a footpath/*

	cycleway runs alongside the A1307; and a cablestayed pedestrian overbridge across the A14 provides a connection to Bar Hill. *Localised visual containment is provided by existing tree belts and hedgerows surrounding the Site and by the rising landform and further trees around Bar Hill to the southwest of the A14. Existing vegetation cover around Bar Hill provides visual separation to the A14, the Site and the landscape to the north. Other settlements at Lolworth, Oakington and Longstanton lie respectively to the west, east and north of the Site have minimal intervisibility with the Site.* *Construction activities will result in temporary, phased, adverse effects on all those that have views of the works.* *Existing positive features will be retained as far as practicable and incorporated into a comprehensive Green Infrastructure (GI) framework which will provide new planting and features for both recreation and wildlife. The majority of vegetation within the Site will be retained. Green corridors and a nature park will be created on Site that will help screen the Proposed Development.* *In addition to the daytime visual assessment undertaken, the Site has been visited at night. The lighting strategy will meet the current environmental standards of good practice to prevent any significant effects from light pollution.* *Extensive GI will encompass approximately 50% of the total site area. The cohesive GI framework retains and enhances existing features of value, delivering comprehensive environmental mitigation. Creation of a Nature Park focussed along Oakington Brook will delivering biodiversity net gain and landscape enhancements."*
Landscape RAG Assessment 2025	Amber
Landscape Comment 2025	Based on the updated information, the overall score has been changed to Amber. The site is in an area of exposed, open farmland and the scale of the proposed development will make it highly visible and bring significant change to the landscape. However, the existing framework of small woodlands, tracks, field boundary trees and hedgerows will be retained and incorporated into the proposed layout and provide some mitigation for the development. Retention of a large swathe of green space on the east of the site will also mitigate the impacts on landscape. Further sensitive mitigation will be required.
Landscape RAG Assessment 2023	Red

Landscape Comment 2023	The information submitted include a Landscape and Visual Appraisal. The findings of the appraisal, considerably devalue the contribution of the site to long and open views across the countryside. In addition, the site contributes to a rural separation between the expanding development at Northstowe, Longstanton and Oakington and the newly completed A14. It is considered that the submitted information does not alter our original assessment.

Landscape RAG Assessment 2021	Red
Landscape Comment 2021	The site has experience considerable change due to the nearby A14 upgrade works. The landscape character of this area has undergone disruption and is degraded due to the intrusion of a major transport route. Development of this site would further degrade the landscape character of the area. Limited low-level development could be achieved if focused near the existing developed area and well buffered.
Biodiversity and Geodiversity RAG Assessment 2026	C25 HELAA- Silent Allocation HELAA- **Amber** LDL Assessment- **Green**
Biodiversity and Geodiversity Officer Comments 2026	C25 HELAA and Allocation HELAA Both silent LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**] includes an Environmental Statement which includes Chapter 7: Ecology and appendices 8.1 – 8.9). Section 6.2 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *"A series of ecological surveys were conducted between 2020 and 2025, including habitat surveys, and specific surveys for badgers, bats, birds, invertebrates, reptiles, and riparian mammals (otters and water voles).* *The Ouse Washes is a Special Protection Area (SPA) and Ramsar site 10 km from the Site. Additionally, the Eversden and Wimpole Special Area of Conservation (SAC) is 11.1 km to the south of the Site. These Sites are not directly hydrologically linked and do not have a potential impact pathway to the Site, therefore are sufficiently distant that no significant effects are anticipated.* *The Site is predominantly arable farmland, which is of limited ecological value. However, a number of key ecological features were identified, including mature treelines, a broadleaved woodland, the Oakington Brook, hedgerows, and two ponds.* *A high number of invertebrate species (520 in total) were recorded, including Species of Principal Importance such as the White-letter Hairstreak butterfly and White-spotted Pinion moth. A low population of common lizard was found on-site, with grass snakes recorded nearby. The Site also supports a population of water voles and is used as a commuting route by otters along the Oakington Brook. Bat surveys identified a regularly used commuting corridor for Barbastelle bats (an Annex II species), and birds included a probable Hobby nest, a Schedule 1 species.* *The Proposed Development will cause a minor loss of mature treeline habitat to facilitate a new access road. This impact is, however, considered to be reversible in the long-term as new habitats establish.* *The assessment has identified a potential adverse impact on bats,*

	particularly the Barbastelle bat commuting corridor along the mature treelines. This could result from disturbance due to light spill from construction and operation, making the effect significant if left unmitigated. The loss of breeding and foraging habitat for farmland birds, such as skylark and yellow wagtail, and invertebrate assemblage, is considered to have an adverse impact. *The Proposed Development has been designed to avoid significant impacts where possible, by locating development on the less ecologically valuable cropland. The majority of mature treelines, the eastern woodland, and the Oakington Brook will be retained and buffered. A CEMP will be implemented with measures to protect retained habitats from pollution, siltation, and accidental damage. Specific mitigation includes a sensitive lighting strategy for construction and operation (less than 0.2 lux in sensitive areas) to protect bats, a passive displacement exercise for reptiles, and a licence-led translocation for water voles from a pond that will be lost. Compensation for lost habitats will be provided through extensive habitat creation measures, including new ponds, species-rich grassland, and new woodland. Where required new access roads will include wildlife underpasses to maintain connectivity for otters and water voles. To provide a long-term benefit, bat and bird boxes will be erected, and a mink monitoring program will be implemented. The proposals will be delivered in accordance with a Habitat Management and Monitoring Plan (HMMP) which will detail how the retained, created and enhanced habitats will be managed for a minimum period of 30 years. This will be provided as part of the information required to discharge the mandatory Biodiversity Net Gain condition that will be improved on the Site by the Environment Act 2021.* *With mitigation in place there will be no adverse significant effects on ecology as a result of the Proposed Development."*
Biodiversity and Geodiversity Guideline Comments 2026	
Biodiversity and Geodiversity RAG Assessment 2025	Amber
Biodiversity and Geodiversity Officer Comments 2025	Having considered the submitted information, the assessment of biodiversity and geodiversiity has not changed substantially. The proposed site may contain priority habitat which will require assessment and possible compensation if removed. A development of the size and scale described would not provide any specific ecological risks to statutory or non-statutory designated sites. However, this does not remove the likelihood of protected and priority species being impacted.
Biodiversity and Geodiversity Guideline Comments 2025	Development of the site may have a detrimental impact on a designated site, protected habitats, priority species, or ecological assets with a regional or local protection, but the impact could be reasonably mitigated or compensated.
Biodiversity and Geodiversity RAG Assessment 2023	Amber

Biodiversity and Geodiversity Officer Comments 2023	No additional information has been provided in relation to ecology impacts and mitigation. The amended site boundary also does not raise any additional ecological issues. Therefore, there is no change to the site assessment scoring.
Biodiversity and Geodiversity Guideline Comments 2023	Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.
Biodiversity and Geodiversity RAG Assessment 2021	Amber

Biodiversity and Geodiversity Officer Comments 2021	Consultation with Natural England unlikely to be required(unless residential). Hedgerows, woodland, mature trees and watercourses may qualify as priority habitat/Habitats of Principal Importance and support protected/notable species. Otherwise likely to be of low ecological value (arable). Buildings and mature trees may support roosting bats (if suitable). Records of bats (including barbastelle), water vole and otter within site. Farmland bird populations may be present.
Biodiversity and Geodiversity Guideline Comments 2021	Development of the site would not have a detrimental impact on any designated site, or those with a regional or local protection.
Policy RAG Rating 2026	C25 HELAA: **Green** LDL Assessment: **Green**
Policy Officer Comment 2026	C25 HELAA The site is wholly outside of protected open space. Detrimental open space impacts are not anticipated.
Policy RAG Rating 2025	Green
Policy Officer Comment 2025	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.
Policy RAG Rating 2023	
Policy Officer Comment 2023	
Policy RAG Rating 2021	
Policy Officer Comments 2021	
Historic Environment RAG Assessment 2026	C25 HELAA: Silent Allocation HELAA: **Green** LDL Assessment: **Green**
Historic Environment Comments 2026	C25 HELAA Silent Allocation HELAA The additional information has been assessed and it is agreed that the Slate Hall Farm buildings are not considered to be non-designated heritage assets. Therefore, from a built heritage perspective, the RAG score has been updated to Green LDL Assessment RPS Tetra Tech, the LDL heritage consultant appraised whether they consider the Slate Hall Farm building to be a non-designated heritage asset

	and found that it is not a NDHA, in their Slate Hall Farm Building Heritage Appraisal Statement, 26 January 2026, – this originally formed part of the LDL Reg18 representation, 30 January 2026. [**Appendix 4**] The application submission (ref. 26/02534/OUT) [**Appendix 1**] Environmental Statement includes Chapter 9: Cultural Heritage and appendices 9.1-9.5. Section 6.4 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *"The sensitive receptors identified when considering cultural heritage were:* *• St Michael's Church a Grade II* listed building;* *• The Grade II listed cottage known as The Grange;* *• The Grade II listed milestone; and* *• The Longstanton Conservation Area.* *The Proposed Development would result in no effect to the heritage assets identified above."*
Historic Environment RAG Assessment 2025	Amber
Historic Environment Comments 2025	Based on the additional information provided, the assessment score remains amber. Slate Hall Farm (a potential non-designated heritage asset) has been excluded from the red line. Nevertheless, the HELAA rebuttal simply reiterates previous comments. The applicants have assessed the site for archaeological remains and have concluded that there are some on the site. Taking this into consideration, the site should remain amber on heritage grounds too as the archaeological evidence could point to the existing building having heritage potential. Development of the site could have a detrimental impact on non-designated heritage asset or its setting, but the impact could be reasonably mitigated.
Historic Environment RAG Assessment 2023	Amber
Historic Environment Comments 2023	The site was originally classed as amber as the assessor considered that Slate Farm may be a NDHA or may be on an earlier site with archaeological potential. The applicants have assessed the site for archaeological remains and have concluded that there are some on the site and that it should remain as amber for that category. Taking this into consideration, the site should remain amber on heritage grounds too as the archaeological evidence could point to the existing building having heritage potential.
Historic Environment RAG Assessment 2021	Amber

Historic Environment Comments 2021	Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated.
Archaeology RAG Assessment 2026	C25 HELAA: Silent Allocation HELAA: **Amber** LDL Assessment: **Green**

Archaeology Officer Comment 2026	C25 HELAA Silent Allocation HELAA Extensive evidence of Iron Age and Roman activity is recorded within, and in the vicinity of the proposed area. This includes evidence for structures of Roman date possibly relating to a Villa estate. Further information would be necessary to determine the suitability of this site for development. LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**] includes an Environmental Statement which includes Chapter 9: Cultural Heritage and Appendices 9.1-9.5. Section 6.4 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *"Archaeological receptors identified on Site include:* • *The late Prehistoric/Romano-British remains on Site;* • *The site of Mesolithic flint tools; and* • *The site of Neolithic flint tools* *It is anticipated that a programme of archaeological excavation, recording, analysis and reporting will be agreed with the SCDC Archaeological Advisor, secured by a condition to planning consent. Whilst the archaeological receptors will be removed, this will be undertaken under archaeological conditions and will preserve the archaeology by record. This will offset their physical loss by realising their archaeological potential."* Post OPA submission, further survey work has been undertaken by Tetra Tech which identifies that the archaeological remains are no more than regional significance and the archaeological interest of the Application Site can be secured via a suitably worded condition being attached to an outline planning consent, requiring archaeological mitigation in advance of development comprising open area excavation, recording and assessment and programs of outreach and publication.
Archaeology RAG Assessment 2025	Amber
Archaeology Officer Comment 2025	Extensive evidence of Iron Age and Roman activity is recorded within, and in the vicinity of the proposed area. This includes evidence for structures of Roman date possibly relating to a Villa estate. Further information would be necessary to determine the suitability of this site for development.
Archaeology RAG Assessment 2023	Amber
Archaeology Officer Comment 2023	Based on the additional information provided, the assessment for the site remains unchanged as Amber as there is evidence of archaeology in the area that will require further investigation.
Archaeology RAG Assessment 2021	Amber

<table>
<tr><td>Archaeology Officer Comment 2021</td><td>Extensive settlement of Iron Age and Roman date known in the area</td></tr>
<tr><td>Accessibility RAG Assessment</td><td>C25 HELAA- Amber
LDL Assessment- Green</td></tr>
<tr><td>Accessibility Comment</td><td>C25 HELAA
Adequate accessibility to key local services, transport, and employment opportunities.

LDL Assessment
The application submission (ref. 26/02534/OUT) [Appendix 1]. includes an Environmental Statement which includes Chapter 6: Traffic and Movement]. This includes the below appendices:
- Appendix 6.1: Transport Assessment
- Appendix 6.2: Site-wide Framework Travel Plan

Paras 3.4.1 and 3.4.2 of the Transport Assessment (KMC Transport Planning) state:
“The site's close proximity to Bar Hill provides very convenient access to local amenities within walking and cycling range, reducing the need for employees to undertake additional short car journeys. A summary of some of these local amenities are presented in Table 3.1

Table 3.1 – Local Amenities
<table><tr><th>Type of Amenity</th><th>Name of Amenity</th><th>Distance from Site (m)</th><th>Walking Times (minutes)</th><th>Cycling Time (minutes)</th></tr><tr><td>Bus stop</td><td>‘Acorn Avenue</td><td>1,150</td><td>14</td><td>4</td></tr><tr><td>Restaurant</td><td>The Fox</td><td>1,200</td><td>15</td><td>4</td></tr><tr><td>Bus stop</td><td>‘Tesco’ Bus Stop</td><td>1,350</td><td>17</td><td>5</td></tr><tr><td>Supermarket</td><td>Tesco Extra ‘Bar Hill’</td><td>1,350</td><td>17</td><td>5</td></tr><tr><td>Cafe</td><td>Costa Coffee</td><td>1,400</td><td>17</td><td>5</td></tr><tr><td>Shopping Centre</td><td>The Mall</td><td>1,400</td><td>17</td><td>5</td></tr><tr><td>Fast Food / Takeaway</td><td>Churchill’s Fish & Chips Bar Hill</td><td>1,400</td><td>17</td><td>5</td></tr><tr><td>Gym</td><td>JH Fitness Academy</td><td>1,700</td><td>21</td><td>6</td></tr></table>
As referenced later in Chapter 4, a number of amenities are also proposed to be provided within the development, potentially including facilities such as a nursery, café, gym, an amenity hub with community space, plus a nature park with various walking routes (around wooded areas, lakes and ponds), and a mobility hub with waiting facilities. All of these amenities will be accessible within a short walk and cycle from each building and are proposed to enhance the existing local amenities currently on offer to future staff and existing residents in the area.”</td></tr>
<tr><td>Site Access RAG Assessment 2026</td><td>C25 HELAA- Silent
Allocation HELAA- Amber
LDL Assessment- Green</td></tr>
<tr><td>Site Access Officer Comment 2026</td><td>C25 HELAA
Silent</td></tr>
</table>

	Allocation HELAA- 05277 The proposed site is acceptable in principle subject to detailed design. Based upon the Masterplan, the access proposed to Zones 1A and 1B appears to have insufficient junction spacing with the existing junction on the A1307 to the west of the site. This access may be amended to an emergency access, with all zones served from a single point of access. Consultation should be undertaken with the CCC Transport Assessment team. LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**]. includes an Environmental Statement which includes Chapter 6: Traffic and Movement]. This includes the below appendices: - Appendix 6.1: Transport Assessment - Appendix 6.2: Site-wide Framework Travel Plan Paras 9.1.7- 9.1.10 of the Transport Assessment (KMC Transport Planning) states: *"Pedestrian and cyclist access to the site will be provided as part of two proposed accesses onto the A1307 shared active travel link on the southwest border of the site and also via Bridleway 151/10 to the north of the site.* *An internal network of shared footways and cycleways will also be provided on site, in line with pedestrian and cycle desire lines and connecting with each building and plot on the site. A network of shared footways and cycleways will also be provided towards the east of the site within the Biodiversity Net Gain (BNG) area.* *Two points of vehicle access to the site will connect directly with the A1307, the first just southeast of Bridleway 151/10 on the southeastern boundary and then the second further west. These access points will also include pedestrian and cyclist infrastructure as outlined above.* *Both site access junctions will be signalised to help maximise capacity, work in conjunction with the existing A1307/A1050 signalised junctions, allow for safe controlled active travel movements alongside vehicle movements, and provide a segregated Pegasus crossing facility for equestrians and a separate Toucan crossing for all NMUs over the site access."* Para 9.2.1 of the Transport Assessment then concludes: *"Based on the contents of this Transport Assessment, it is considered that the impacts of the proposed development are not severe, nor would there be an unacceptable impact on road safety, NMU accessibility, and highway capacity. There should therefore be no reason on transport grounds why the proposed development should be prevented or refused."*
Site Access RAG Assessment 2025	Amber

Site Access Officer Comment 2025	Based on the additional information provided, assessment of the site remains unchanged as Amber. The site is acceptable in principle, subject to greater detail. A significant level of infrastructure will be required outside the site boundary to encourage more sustainable transport links. It is unclear whether these sustainable transport links can be achieved within the local available constraints.
Site Access RAG Assessment 2023	Amber
Site Access Officer Comment 2023	Based on the new information provided, the site access assessment remains unchanged. The proposed site is acceptable in principle subject to detailed design.
Site Access RAG Assessment 2021	Amber
Site Access Officer Comment 2021	The proposed site is acceptable in principle subject to detailed design. The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site.
Transport and Roads RAG Assessment 2026	C25 HELAA- Silent Allocation HELAA- **Amber** LDL Assessment-**Green**

Transport and Roads Guideline Comments 2026	C25 HELAA Silent Allocation HELAA The site has sustainable links to Northstowe but does not have very good bus and cycle links to Cambridge. Development of the site will likely cause severe junction capacity issues at the Bar Hill Interchange due to the reduction in lanes originally proposed on the northbound off-slip as part of the A14 highways works. There are constraints, which mean that additional required capacity cannot be easily implemented hence the reliance on the reduction of car trips through modal shifts to public transport and active travel, which do not yet have the appropriate infrastructure. Any potential impact on the functioning of trunk roads and/or local roads will need to be mitigated. LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**]. includes an Environmental Statement which includes Chapter 6: Traffic and Movement and Appendices 6.1-6.2. Paras 9.1.12 of the Transport Assessment (KMC Transport Planning) states: *"Following the proposed mitigation strategy to upgrade the existing A1307-B1050 Jughandle Junctions, and A14 Junction 25, the proposed development is expected to have a Nil Detriment impact on network capacity. All other junctions assessed for capacity within the study area are predicted to operate within capacity in the future 2030, 2035 and 2045 with committed development plus proposed development weekday peak scenarios."*
Transport and Roads RAG Assessment 2025	Amber

Transport and Roads Guideline Comments 2025	Having considered the updated information, the overall score has remained unchanged. The site has sustainable links to Northstowe. The site does not have very good cycle links to Cambridge. Development of the site will likely cause severe junction capacity issues at the Bar Hill Interchange due to the reduction in lanes originally proposed on the northbound off-slip as part of the A14 highways works. There are constraints, which mean that additional required capacity cannot be easily implemented hence the reliance on the reduction of car trips through modal shifts to public and active travel, which do not yet have the appropriate infrastructure. Robust mitigation, Transport Assessment and Travel Plan work will be required.
Transport and Roads RAG Assessment 2023	Amber
Transport and Roads Guideline Comments 2023	Following further consideration of the site, including the additional information, the site assessment has been changed to amber. Whilst the site is remote from any existing passenger transport infrastructure, development would need to provide high quality passenger transport links to Cambridge, links into local non-motorised user facilities (via the existing A1307 cycleway) and will impact on the A14 and associated junctions and local links. Will require a robust Travel Plan.
Transport and Roads RAG Assessment 2021	Red
Transport and Roads Guideline Comments 2021	Transport Assessment and Travel Plan required.
Noise, Vibration, Odour and Light Pollution RAG Assessment 2026	C25 HELAA- Silent Allocation HELAA- Silent LDL Assessment- **Green**
Noise, Vibration, Odour and Light Pollution Guideline Comments 2026	C25 and Allocation HELAA Silent LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**] includes an Environmental Statement which includes Chapter 11: Noise and Vibration including appendices 11.1-11.6. Section 6.6 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *A survey of existing baseline noise levels has been carried out at noise sensitive properties identified in the vicinity of the Site. These sensitive receptors are:* • *Orchard Cottages;* • *Hazelwell Cottages;* • *Poplar Villas;* • *Oakington;* • *Bar Hill;* • *Phypers Cottages;* • *Slate Hall; and* • *residential and commercial properties on Hattons Road and Dry Drayton Road* *The survey found that existing noise levels are dominated by road traffic predominantly from the A14.*

	Noise and vibration from construction of the Proposed Development will be carried out in accordance with a CEMP, which will include details of how noise and vibration will be mitigated. Noise and vibration from construction activities will be carried out in accordance with best practice methods in BS 5228. Following implementation of mitigation measures for predicted noise levels there will be no significant residual effects. *The assessment has considered the impact of noise from operation of the Proposed Development, including from mechanical services plant, break-out from proposed units and servicing activity. Compliance with the recommended noise criteria will result in a minor adverse impact at the residential receptors and negligible effect at the commercial receptors of Bar Hill Hotel, Oakington Business Park, and Hazelwell Court. The effect is not considered significant.* *When considering noise from external activity during the day without mitigation significant adverse effects are expected at Slate Hall. During the night, significant adverse effects will exist for residents at Orchard Cottages and Slate Hall. As a result of mitigation measures, including acoustic screening along the boundary of the Site with Slate Hall, it is considered there will be no significant effects.* *The changes in road traffic levels is considered to be negligible (not significant) at all receptors.*
Noise, Vibration, Odour and Light Pollution RAG Assessment 2025	Amber
Noise, Vibration, Odour and Light Pollution Guideline Comments 2025	The assessment of the site remains unchanged as Amber. The proposed site will be affected by road traffic noise from nearby main roads but is acceptable in principle subject to appropriate detailed design considerations and mitigation.
Noise, Vibration, Odour and Light Pollution RAG Assessment 2023	Amber
Noise, Vibration, Odour and Light Pollution Guideline Comments 2023	New information provided has not changed the assessment. The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation. Detailed site specific assessments will be required for any future planning applications at this location.
Noise, Vibration, Odour and Light Pollution RAG Assessment 2021	Amber

Noise, Vibration, Odour and Light Pollution Guideline Comments 2021	The site is capable of being developed to provide healthy internal and external environments in regard to noise I vibration/ odour/ Light Pollution after careful site layout, design and mitigation.
AQMA RAG Assessment 2026	C25 and Allocation HELAA- Silent LDL Assessment- **Green**
Air Quality Officer Comment 2026	C25 and Allocation HELAA Silent

	LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**]. includes an Environmental Statement which includes Chapter 10: Air Quality Section 6.5 of the ES Non-Technical Summary (SLR, June 2026) [**Appendix 1**] states: *"Sensitive receptors include Hill Farm Cottages, Rhadegund Cottages, Hackers Fruit Farm, residential properties along Dry Drayton Road, Hazelwell House, Noon Folly Farm, The Willows, residential properties along Oakington Road, Catch Hall Farm, Weaver's Field, Hatton's Road, Lofthouse Way, Eaton Way, the B1050, and Over Road, also and Little Owl Pre-School. These sensitive receptors are located within 250 m from the Site boundary.* *During the construction and operation of the Proposed Development there is the potential for air quality impacts as a result of road vehicle exhaust emissions associated with vehicles travelling to and from the Site. Following assessment, results indicated that effects were not predicted to be significant at any sensitive receptors.* *Mitigation measures to reduce the impacts from road vehicle exhaust emissions include the following:* *• Provision of a Travel Plan to encourage sustainable transport modes to and from the Site;* *• Provision of secure cycle storage;* *• Provision of green infrastructure throughout the Site to absorb pollution; and* *• Provision of Electric Vehicle charging points* *Based on the results of the assessment, air quality effects associated with the Proposed Development are not considered to be significant."*
AQMA RAG Assessment 2025	Amber
Air Quality Officer Comment 2025	Based on the additional information provided, assessment of the site remains unchanged as Amber. The site does not fall within an Air Quality Management Area (AQMA). Given the scale of the scheme, inherent/intrinsic designed-in air quality mitigation measures may be necessary to offset impacts on designated AQMAs.
AQMA RAG Assessment 2023	Amber
Air Quality Officer Comment 2023	The additional information provided does not significantly affect air quality issues or mitigation. Therefore the assessment of the site remains unchanged since the original assessment. The site is located outside an AQMA but there is potential for an impact on AQMA which will require inherent / intrinsic designed in Air Quality mitigation.
AQMA RAG Assessment 2021	Amber
Air Quality Officer Comment 2021	Partially in AQMA. Will require inherent / intrinsic designed in AQ mitigation.
Contaminated Land RAG Assessment 2026	C25 and Allocation HELAA- Silent LDL Assessment- **Green**

Contaminated Land Officer Comments 2026	C25 and Allocation HELAA Silent LDL Assessment The application submission (ref. 26/02534/OUT) [**Appendix 1**] includes a 'Preliminary Risk Assessment' prepared by DTS Raeburn Limited (part of Igne) Ground Contamination is addressed at Section 8.0 and concludes (pg.18) that: *"On the basis of the foregoing, the risk to the proposed development from ground contamination is generally considered to be low. However, a limited amount of soil sampling and contamination laboratory testing should be considered as part of any future ground investigation works in order to confirm the observations and to provide data for construction workers, in addition to aid classification of surplus soil arisings (if any) for off-site disposal."*
Contaminated Land RAG Assessment 2025	Amber
Contaminated Land Officer Comments 2025	The additional information provided does not significantly affect environmental health issues or mitigation. Therefore the assessment of the site remains unchanged since the original assessment as this is a site with the potential for historic contamination and planning conditions will be required.
Contaminated Land RAG Assessment 2023	Amber
Contaminated Land Officer Comments 2023	The additional information provided does not significantly affect environmental health issues or mitigation. Therefore the assessment of the site remains unchanged since the original assessment as this is a site with the potential for historic contamination and planning conditions will be required.
Contaminated Land RAG Assessment 2021	Amber
Contaminated Land Officer Comments 2021	Potential for historic contamination, conditions required.
Overall Suitability Score	C25 and Allocation HELAA – **Amber** LDL Assessment- **Green**
Further constraints	
Agricultural Land Classification Grade 1 (% overlap)	0

Agricultural Land Classification Grade 2 (% overlap)	**70.80** **36.74%** The application submission (ref. 26/02534/OUT) [**Appendix 2**] includes a 'Agricultural Land Classification Report' (June 2026) prepared by Wardell Armstrong
Agricultural Land Classification Grade 3 (% overlap)	**29.20** **33.70% Subgrade 3a** **16.59% Subgrade 3b** The application submission (ref. 26/02534/OUT) [**Appendix 2**] includes a 'Agricultural Land Classification Report' (June 2026) prepared by Wardell

	Armstrong
Agricultural Land Classification Grade 4 (% overlap)	0
Agricultural Land Classification Non Agricultural (% overlap)	0 **12.97%** The application submission (ref. 26/02534/OUT) [**Appendix 2**] includes a 'Agricultural Land Classification Report' (June 2026) prepared by Wardell Armstrong
Agricultural Land Classification Urban (% overlap)	0
Source Protection Zone (% overlap)	0
Highways England Zones	A14 West
Available	-
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The site was submitted by the landowner and/or site promoter who has confirmed that the site is available for development in the timescales indicated.
Are there known legal or ownership impediments to development?	No
Is there planning permission to develop the site?	Greater Cambridge Assessment No, Application pending for retrospective change of use for the recycling of inert (CD&E) waste into recycled aggregate material. (23/04293/FUL) LDL Assessment LDL submitted an Outline Planning Application (OPA) for the development of a 230,000 sqm Employment Park on the c.100ha Cambridge 25 site (ref.26/02534), validated on 03 July 2026.
When will the site be available for development?	0 to 5 years
Available RAG	**Green**
Achievable	-
Is there a reasonable prospect that the site will be developed?	The land has been promoted by the landowner and or developer and is known to be available for development. The site has a low existing use value and development is likely to be economically viable
Achievable RAG	**Green**
Capacity	-
Prevailing Density (weighted) (dwellings per ha)	30
Residential capacity at prevailing density	1509
Estimated employment space (m2)	70000- 260000

	230,000
Estimated start date	0-5 Years
Estimated annual build-out rate (pa)	-
Development completion timescales (years)	6-10 Years 3-10 years

Appendix 3: Delivery Statement (Salhia, September 2026)

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S/SHF Site Allocation and Cambridge 25: Delivery Statement

Introduction

The purpose of this Delivery Statement is to explain how the promoter of the (102.2ha) Cambridge 25 site, comprising the majority of the (113.3ha) policy S/SHF site allocation, intends to deliver the c.230,000 sqm Cambridge 25 Employment Park development.

Lolworth Developments Limited and Salhia Real Estate Company

Lolworth Developments Limited is the property development company behind Cambridge 25, leading its promotion through the GCLP process. It is a wholly owned subsidiary of Salhia Real Estate Company of Kuwait.

Salhia, established in 1974, is a name synonymous with the creation, ownership and management of fine commercial real estate, both in Kuwait and abroad including the UK.

Salhia is a major developer and owner/ asset manager in Kuwait's retail, leisure, hotel and office market, focussed on Kuwait City. It is a publicly quoted Property Company listed on the Kuwaiti stock exchange and has a reputation for creating high quality "best in class" projects.

Their most recently completed project in Kuwait City is the c 4m sq ft Assima Mall. This 6 level shopping and leisure complex together with a 54 storey office tower and aparthotel (Marriott Executive Apartments) was completed in 2021 at a cost of c $700m and is owned by the Company.

Salhia has also pursued an international development strategy for over 30 years in the UK and Europe. An example of this was the delivery of 16 high-quality residential complexes for the elderly in Germany.

Salhia's development activity in the UK has included the delivery of projects both in Joint Venture and on a solus basis.

Salhia formed a JV with St Modwen Properties PLC (now Indurent) in 1997 which, at its peak, was worth over £600m. This collaboration has included the acquisition, development and sale of a number of development projects located in the north west, south, and south east of England, London and the Midlands.

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More recently, Salhia has self-funded and is developing out the £150m mixed use "Beorma Quarter" regeneration project in Birmingham city centre, which includes the 29 storey Beorma Tower, providing over 250,000 sq ft of offices, retail and residential accommodation.

This development, which is located next door to the Bull Ring Shopping Centre and is due to be completed in October 2026 is an excellent example of Salhia's delivery capabilities and the type of high-quality project which they are renowned for creating.

Cambridge 25

Salhia was attracted by the opportunity to promote, develop and own a strategic employment park on the outskirts of Cambridge, on the Cambridge 25 site, leading to it entering into a conditional contract with the site's single landowner, Welney Farms Property Limited.

Salhia then appointed a highly experienced and capable professional team of development managers, planning consultants, architects, engineers, traffic consultants, ecologists, landscape architects, environmental consultants, commercial leasing agents and others, with a proven track record of promoting and assessing employment park development, through the plan-making and planning application processes, and delivering high-quality logistics and employment park developments in the UK.

Salhia is presently focussed on those planning processes and while its current objective is to develop out and retain ownership of an Employment Park of the highest quality (once it has secured planning permission) it is used to working in Joint Venture with other property companies. Salhia are well versed and experienced in procuring the delivery of their Projects in different ways.

Salhia has received, during the GCLP promotion process, unsolicited approaches from a number of large UK logistics and employment park developers who have expressed an interest in becoming involved in the delivery of the Cambridge 25 development.

Therefore, if at the appropriate time Salhia were to favour such a delivery route they are confident that there would be no shortage of interested JV partners.

Summary

Salhia is a Kuwait-based property owner, developer and asset manager with substantial experience and capabilities in the delivery of large-scale high-quality development projects across many development sectors both at home but also internationally, including the UK. It prides itself on the delivery of "best in class" high-quality major

SALHIA

property developments, applying its considerable financial resource, development expertise and experience.

Salhia has secured the land and assembled a planning team well capable of promoting and securing the GCLP site allocation and planning permission for a c. 230,000 sq m employment park development on the Cambridge 25 site.

Post receipt of planning, Salhia's focus will be on the early delivery of a high-quality exemplar landscape led major Employment Park through the application of its considerable financial resources and property development expertise.

While it remains Salhia's intention to fund and develop out Cambridge 25 and thereafter to retain its ownership, mirroring their strategy with their Beorma Quarter project in Birmingham, the Company is aware that there are substantial property companies in the UK who have expressed interest in being involved in the Project in some way.

From a commercial perspective this provides Salhia with alternative procurement options should this be something they wish to explore at some point in the future.

[redacted]

Name: Nasser Al- Ghanim
Title: Investment Group Head
Salhia Real Estate Company K.S.C

Appendix 4: The Slate Hall Farm Building Heritage Appraisal (RPS Tetra Tech, 26 January 2026)

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26th January 2026

SLATE HALL FARM BUILDING HERITAGE APPRAISAL STATEMENT

RPS (a Tetra Tech Company) act as the heritage consultant to LDL on the Cambridge 25 development project. We have been asked to appraise whether we consider the Slate Hall Fram building to be a non-designated Heritage asset (NDHA) or otherwise, in the light of the draft GCLP site allocation indicating that this has the 'potential' to be a NDHA. We have undertaken our heritage appraisal informed by our inspection of the building and its setting and research.

Policy S/SHF: Land North of A1307 Bar Hill (Slate Hall Farm) includes the following statement:

The development of Land North of A1307, Bar Hill (Slate Hall Farm) must do the following:

[…]

7. Mitigate the impact of the development on Slate Hall Farm, a potential non-designated heritage asset, and its setting.

[…]

Slate Hall Farm is shown on Ordnance Survey mapping from the late 19th century onwards as a typical square courtyard farmstead with an entrance at the south-western corner. The ranges making up three sides of the courtyard were demolished between the 1950s and the 1970s and replaced with generic 20th century large farm storage buildings, probably as part of the reorganisation and modernisation of the farmstead that included the construction of the current detached farmhouse to the south-west. The southern range and the southern end of the western range are the only remaining parts of the nineteenth century farmstead that survive. The southern range is split into a two-storey brick with cement render building which seemingly continues to be in residential use and a single storey building. The building has no intrinsic heritage interest and no real legibility as having originated as part of a courtyard farmstead

The present setting of the 19th century farm buildings comprises their immediate surroundings of mixed 20th century commercial, storage and light industrial uses. This results in a very modern, un-agricultural setting. The wider surroundings do provide a more agricultural setting, though the farmhouse and modern commercial activity are markedly contained by perimeter planting, and the farm and the fields do not present as an obvious co-functional group.

We therefore adjudge the Slate Hall Farm building not to be a non-designated heritage asset.

Richard Smalley FSA BA (Hons) MCIfA AssocIHBC

Senior Director

Tetra tech/RPS

RPS Consulting Services Ltd. Registered in England No. 01470149.



Slate Hall Farm



Slate Hall Farm setting



Slate Hall Farm setting



Slate Hall Farm setting

LICHFIELDS

Appendix 5: Greater Cambridge's Conservation Officer Consultation Response (dated 04 August 2026) to Outline Planning Application (ref. 26/02534)

GREATER CAMBRIDGE
SHARED PLANNING

APPLICATION - CONSULTATION RESPONSE

Consultee:	BNE - Conservation
Reference Number:	26/02534/OUT
Proposal:	Development of up to 230,000 m2 GIA of employment floorspace (within Use Classes E (g)(i), E(g)(ii), E(g)(iii), B2, and B8) together with supporting community and amenity space (within Use Classes F1, F2, E(a), E(b), E(d), and E(f)), nature park and biodiversity zone, service yards and parking areas, formation of primary means of access, associated landscaping, earthworks, drainage and other associated works (outline, all matters reserved except for the principal means of vehicular access to the Site).
Site Address:	Land East of Junction 25 Of the A14, Huntingdon Road, Bar Hill, Cambridgeshire
Case Officer:	Luke Waddington
Responding Officer:	Emily Carter
Date:	04/08/2026

☒ No objection
☐ Further information and / or amendments are required:
☐ Object for the following reasons:
☐ Outside remit of this consultee's specialism

Documents Reviewed

- Cover Letter
- Planning Statement
- Design and Access Statement
- Environmental Statement Chapters 1.0-5.0, 9.0 and 16.0 and Appendices 8.5 and 8.6
- Site Plan
- Illustrative master plan
- Parameter plan
- Landscape parameter plan
- A1307 Northern Site Access plan
- A1307 Southern Site Access plan
- 26/00771/SCOP Scoping report and Scoping opinion

The site and proposals

The site is a 103Ha area of land located immediately north of the A14, to the northeast of Junction 25 and is currently used for agriculture. Central to the site is Slate Hall Farm (outside the red line) which is comprised of the remains of a much-altered 19th century farmstead, and mixed 20th century commercial, storage and light industrial uses, which are contained by perimeter planting.

The proposed development would introduce large scale-built development for employment, community and amenity uses onto the site with associated vehicle access and parking, planting and drainage features. The proposals have been developed though a PPA process and the submitted Environmental Statement scope has been agreed via an earlier scoping opinion application (26/00771/SCOP).

The heritage assets

The Environmental Statement has considered impact on cultural heritage in accordance with the advice given in the Scoping Opinion 26/00771/SCOP. There are no heritage assets on site which would be directly or indirectly affected by the proposed development.

Heritage assets that have been scoped in to the impact assessment are:

- Grade II milestone 85m South of the southern Boundary
- Grade II* Church of St Michaels at Longstanton
- Grade II The Grange, St Michaels, Longstanton
- Longstanton Conservation Area

It had previously been queried whether Slate Farmhouse constituted a non-designated heritage asset (NDHA), however a heritage assessment provided as part of the Local Plan call for site HELAA showed the site had undergone lot of modern development and changes and it is agreed that the building is not considered a NDHA, so can be excluded from the impact assessment.

The impact of the proposals on the heritage assets

It is agreed that the assessment provided in chapter 9.0 of the Environmental Statement sufficiently summarises the sensitivities of the above heritage assets and the magnitude of impacts both at construction and operational phases. While there would be greatest intervisibility between the listed milestone and the development site, it is agreed that it derives its significance from it age and road-side position, and the development in its setting will not impact the ability to appreciate this. The church of St Michael and The Grange are at sufficient distance and suitably screened, and the site does not directly contribute to their significance, so again impact on their significance will be negligible.

There will be a small degree of adverse impact on the setting of Longstanton Conservation Area, with possible long-distance views of the tops of buildings, however it is agreed the degree of separation and screening would mean the visual impact would be very minor. Overall, the impact is considered a low level of less than substantial harm in NPPF terms. In accordance with paragraph 215 of the NPPF where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The County Council Archaeology Team are best placed to advise on below grown heritage impacts and proposed mitigation strategies.

Recommendation

Comment have been made with reference to the 1990 Planning (Listed Buildings and Conservation Areas) Act s. 66 [1] and 72 [1] and Chapter 16 of the NPPF (2024)

It is considered that the proposal will not adversely affect the significance setting of the Listed Buildings. The proposals will cause a low level of less than substantial harm to the setting of the Conservation Area for the reasons set out above. The degree of harm needs to be weighed against the public benefits of the scheme.

The proposals will meet the requirements of Local Plan policy NH/14 for the reasons set out above.

Appendix 6: Market Demand Assessment Chapter of the Cambridge 25 Market Assessment (Savills, May 2026)

6. Market Demand Assessment

6.1 Summary

6.1.1 Overall, there is a good level of demand evidenced by occupier requirements across the full spectrum of size ranges. However, transactions of units of 1,858 sq. m (20,000 sq. ft) in Greater Cambridge have been very limited over the last 2 years with only four transactions since 2024. This is indicative of a very constrained supply position of suitable units in line with our analysis at **Section 3** (and confirmed by the Local Authority's evidence base).

6.1.2 There are numerous examples of local businesses within Greater Cambridge and the wider Cambridgeshire area that occupy premises in excess of 9,300 sq. m. This is clear evidence that an arbitrary limit on the size of the unit to be permitted at the Subject Site would result in not being able to meet the full spectrum of local market demand. There is also evidence of occupiers that have been forced to look elsewhere due to a lack of availability of premises of sufficient scale (both local companies – Marshalls - and national companies seeking to serve Greater Cambridge - DHL).

6.1.3 The Subject Site is ideally placed to assist in meeting this pent up demand. In order to meet demand from local occupiers it is essential that a full range of unit sizes can be accommodated without restriction, as proposed.

6.2 Introduction

6.2.1 An analysis of market demand within Greater Cambridge is provided within this Section in order to illustrate the types of occupiers and scale of demand to which the proposals for the Subject Site will respond.

6.3 Characteristics of Demand

6.3.1 Our analysis of market demand is provided within the context of the dynamics of the I&L sector and the general principles of how this market functions.

6.3.2 There is a misconception implicit in the Great Cambridge's emerging local plan that the role of large units in excess of 9,300 sq. m is purely to accommodate regional and national occupiers and that the need of local occupiers is for only small and mid-sized units. It therefore follows in this erroneous line of thinking that large units are not needed to meet demand from local occupiers.

6.3.3 Businesses within the sector occupy buildings across a wide range of scales to meet their specific business needs. The size of the unit does not determine the type of occupier, or the market being served; it is much more nuanced. There is no fixed threshold above which it can be determined that the catchment of the facility is greater than local. This will be determined by the company's specific business model, customer base and supply chain linkages.

6.3.4 Furthermore, companies which are based locally have many reasons for requiring premises of both smaller and larger scales subject to business needs. In contrast, a company can be multi-national with no local connection and require a small facility.

6.3.5 Experience shows that it is common for locally-based companies to require large premises to meet their operational requirements as they grow and adapt to changes in the business environment. Savills has identified a number of local Greater Cambridge companies who occupy large units that were built prior to the restrictive policy. If these companies' operations required them to relocate to large premises today, they would have to leave the area. **Table 6.1** provides three examples of local, Greater Cambridge-based occupiers of large units.

6.3.6 Further examples of companies which are outside, but in close proximity to, Greater Cambridge include:

- Granta Processors Limited: long standing Cambridge-based company processing seeds and pulses for human consumption. The origin of Granta UK goes back over 100 years. They now occupy a very old warehouse unit of c. 9,420 sq. m (101,412 sq. ft) in St Neots.
- G's Fresh: a family owned fresh produce company which was founded in Ely in 1952 and now occupy a premises of c. 18,580 sq. m (200,000 sq. ft).

6.3.7 It is very clear that local companies require a wide range of unit sizes, including those in excess of the proposed 9,300 sq. m threshold which is included with the draft allocation of the Subject Site.

Table 6.1 Local Occupiers in Greater Cambridge with Large I&L / Logistics Premises

OCCUPIER	IMAGE
Cambridge University Press & Assessment (CUPA) occupies a c. 17,187 sq.m (185,000 sq.ft) warehouse built in 1990. The building is primarily in industrial use with about 5% of the floorspace for offices. The occupier is part of the University of Cambridge. CUPA's main job is to design and produce exams used around the world. 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.	
Fred Smart Logistics occupies a c. 11,148 sq. m (120,000 sq. ft) warehouse in Papworth Business Park in Papworth Everard that was built in 2014. The private company carries out logistics (storage and distribution). Although newly established, the company is part of the longstanding Frederic Smart & Son Ltd which started as an agricultural products trader. The company initially established its presence in Whittlesford in 1919 when it bought a mill. The company has continued to expand its operations, acquiring larger warehouse sites to expand its storage and distribution capacity.	

OCCUPIER	IMAGE
Hain Daniels occupies a 26,942 sq. m (290,000 sq. ft) warehouse on Chivers Way in Histon built in 1990. Whilst Hain Daniels is based in Leeds, the Histon site was originally occupied by the Chivers family who began jam production in the 1870s. The facility became one of the largest jam and preserves manufacturers in Britain. The Histon operation was replaced by Premier Foods who bought the local factory and redeveloped it. The local operation was then purchased by Hain Daniels who continues to produce jam from the site, continuing the Chivers family's food production activities. Today, the site accommodates a range of activities including food manufacturing, R&D, supply chain logistics, and packing and warehousing.	

Source: Savills, CoStar, 2026

6.3.8 Furthermore, regional and national companies also have a requirement to serve their customer base within Greater Cambridge as part of their wider operation. This includes Greater Cambridge residents, as well as local business within all sectors, including R&D, education and life sciences for example, that are all underpinned by an efficiently operating I&L sector (something which is not currently facilitated within Greater Cambridge, which is often being served from further afield due to lack of supply of land and premises). This is inefficient and unsustainable.

6.3.9 Accordingly, the application proposals respond to a full range of occupier requirements from companies of all scales, seeking to serve Greater Cambridge from high quality and well-located premises which enable excellent access to customers, labour supply and their wider supply chain.

6.4 Occupier Demand

6.4.1 It is important to note that, as a general principle, most occupier requirements start with a relatively wide search area (particularly those for logistics operators) which are then refined and narrowed down, subject to availability of suitable opportunities.

6.4.2 It should also be noted that occupier requirements do not respect local authority boundaries. Occupiers are guided by their particular business model, including those factors outlined at **Section 2** of this report in relation to accessibility to customers, labour and supply chain companies. Occupier requirements therefore often relate to a sub-regional or regional geography and/or a catchment around key transport links (for example, the A14 Corridor).

6.4.3 Finally, given the artificial suppression of availability of larger size band units which is evidenced within **Section 3**, occupiers would be very unlikely to specify a narrow search area around Cambridge in the knowledge that there is no availability.

6.4.4 In the context of these points, we have provided analysis of relevant current live market requirements which have a Cambridgeshire and Greater Cambridge focus and would therefore consider the

Subject Site within their locational search parameters at **Table 6.2** below. Please note that this is not an exhaustive list and represents a snapshot in time.

Table 6.2: Live Requirements

Ref	COMPANY	SIZE (sq. m)	SIZE (sq. ft)	SEARCH AREA	COMMENTS
1	Marshalls Aerospace	10,219 – 11,148	110,000 – 120,000	Cambridge / Newmarket	Separate to Land Systems requirement which is reviewed below. Premises required by end 2026.
2	Bretts transport	9,290 -23,225	100,000 - 250,000	Cambridgeshire	Cambridgeshire occupier seeking more accessible location. Contract led requirement. Existing premises preferred.
3	SBH obo occupier	4,645 – 16,258	50,000 – 175,000	Cambridge + 25 miles	Large yard and multiple loading doors. Existing buildings.
4	MM Flowers	13,935 - 27,871	150,000 – 300,000	Cambridgeshire	Existing unit at Alconbury. Seeking new premises on a Build to Suit basis.
5	Hilton Foods	13,935-18,580	150,000-200,000	Cambridgeshire	Viewed existing buildings in the past but requirement remains unsatisfied. Likely to favour built to suit with some cold store fit out.
6	Arena Group	18,580 – 23,225	200,000 – 250,000	Cambridgeshire	Currently based in St Ives. Seeking new larger premises.
7	Bensons for Beds	23,225	250,000	Cambridgeshire / A14	Considering relocation from existing premises at Huntingdon.
8	DHL/Evri	4,645 – 18,850	50,000 – 200,000	Cambridgeshire	Requirement for premises to serve Cambridgeshire area. Considering unit in Peterborough.
9	Westland horticulture	46,451+	500,000 +	A1 / A14 / Cambridgeshire	Long standing unsatisfied requirement. Existing premises at Peterborough and Alconbury. Relocation from Peterborough unit with Cambridgeshire catchment.
10	Confidential occupier c/o CBRE	37,161+	400,000 +	A14 Corridor	Has focused on existing / under construction options in Corby but remains unsatisfied. Considering Peterborough and would look at locations along the A14. Contract led.

Ref	COMPANY	SIZE (sq. m)	SIZE (sq. ft)	SEARCH AREA	COMMENTS
11	Newmark obo occupier	23,225 – 32,516	250,000 – 350,000	East Midlands/West Midlands/ Beds/ Cambs	Large yard required, target 2026 occupation.
12	JLL obo occupier	11,148 – 23,225	120,000 – 250,000	A14 Corridor – Cambridge to Felixstowe	B2 occupier requiring new premises.
13	CBRE obo occupier	4,645 – 27,871	50,000 – 300,000	Bedford + 30 miles	Existing or Build to Suit

Source: Savills Industrial Agency April 2026

6.4.5 It is clear that there is a range of demand from occupiers seeking new premises which would be suitable for the Subject Site should this be available. Demand is across a full range of unit sizes including many requirements in excess of the arbitrary 9,300 sq m / 100,000 sq ft definition suggested in the supporting text to emerging policy. However, the lack of available land and premises within Greater Cambridge (and the shortage across the wider FEMA) means that it is challenging for these occupiers to find a location to meet their needs. As a result, a number of requirements have remained unsatisfied for some considerable time.

6.4.6 *Marshall Land Systems* is an example of a locally based company that have been unable to find appropriate permanent space to date within Greater Cambridge in order to facilitate their continued growth and expansion.

6.4.7 Marshall Group, who are based in Cambridge, has sold part of their business (Marshall Land Systems), to a Canadian based investment company (Flowing River Capital). The sale meant that Marshall Land Systems were seeking a new site. They are in temporary space in Cambridge but had a requirement to find a new warehouse and be operational by the end of 2026. They were seeking factory / warehouse space of 13,935 sq. m (150,000 sq. ft) with a further 1,858 sq. m (20,000 sq. ft) of offices and c.300 car parking spaces for staff.

6.4.8 The strong preference was to be within 30 miles of Cambridge however, despite a lengthy search, they were unable to identify suitable options in this area. They therefore inspected options as far afield as Bury St Edmunds and Ipswich. Business needs have subsequently changed and they are rumoured to be taking a premises much further afield to meet a contract requirement. This has been confirmed by Marshalls who are quoted within a BBC article as follows:

> *Marshall Land Systems said it had actively sought suitable, cost-effective premises within the local area "but had been unable to find an option" to "allow the business to continue operating in an efficient and financially sustainable way".*[8]

6.4.9 (Please note that Marshalls Aerospace now have a new and separate requirement which is included within **Table 6.2** above)

[8] 'Defence contractor to move manufacturing to Wales' www.bbc.co.uk, 15th May 2026 https://www.bbc.co.uk/news/articles/cdjpzd22ejzo

6.4.10 *Cambridge Aerospace* (a locally based aerospace engineering company) also had a longstanding requirement for a unit of 4,645 -6,503 sq. m (50,000 – 70,000 sq. ft) within Cambridgeshire. This has now been satisfied by a combination of four smaller units at Bourn Quarter (see below) reflective of the lack of suitable sized premises within the search area.

6.4.11 *DHL*: further evidence is provided by DHL's search, albeit now somewhat historic. DHL signed a long-term lease for a 11,770 sq. m (126,689 sq. ft) unit at Lightning Park, Huntingdon in Q1 2023. DHL serve Greater Cambridge from this unit and had originally sought to locate within Cambridge and surrounds but expanded their search area due to lack of availability. This demonstrates the need to be flexible around unit size in order enable occupiers to efficiently serve the Cambridge market. This is indicative of market sentiment, that Greater Cambridge is currently being served from the surrounding sub-region out of necessity and inability to find suitable land and premises more locally.

6.4.12 The lack of available land to provide high quality modern I&L floorspace in units of scale within Greater Cambridge has directly impeded this occupier's ability to deliver expansion, efficiency and meet business needs. This has ultimately resulted in their search area being expanded outside Greater Cambridge. This investment and economic benefits (including employment) may well be lost to the area as a result. The alternative being that the occupier remains in sub-optimal accommodation thereby impeding the operation and productivity of their business.

6.5 Greater Cambridge Take-up

6.5.1 Take up of I&L floorspace within Greater Cambridge is considerably constrained by a lack of supply (particularly in relation to larger units as highlighted above and within **Section 3** of this report).

6.5.2 Whilst there is some churn of small units, there has been very limited take up of units in excess of 1,858 sq.m (20,000 sq. ft) over the last 24 months, being limited to the following transactions:

- *Cambridge Aerospace* have taken 4 units at Bourne Quarter in February 2026 totalling 7,573 sq. m (81,515 sq. ft). The units comprised of 1,844 sq. m (19,857 sq. ft), 1,500 sq. m (16,146 sq. ft), 1,494 (16,083 sq. ft) and 2,735 (29,442 sq. ft).
- *Tesla* took a unit of 3,884 sq. m (41,808 sq. ft) at Bar Hill in November 2024.
- *Arken Pop International* took a unit of 2,939 sq. m (31,630 sq. ft) at The Way, Royston in May 2024.
- *UKRI* took a unit of 2,990 sq. m (32,183 sq. ft) at Trafalgar Way, Bar Hill in April 2024

6.5.3 In line with our findings set out within **Section 3** and **Section 5**, as well as with Greater Cambridge's own evidence base which is reviewed at **Section 4**, it is clear that transactional activity within the I&L sector is being significantly supressed within Greater Cambridge due to a lack of supply, notably in relation to larger units.

6.6 Conclusion

6.6.1 Despite a clear demand for I&L premises across a range of sizes, including larger units in excess of 9,300 sq. m, both local and national companies seeking to serve Greater Cambridge are unable to find suitable accommodation and, as a result, take up has been very limited. This unmet demand causes delays in occupiers finding space, results in businesses leaving the area and serving Greater Cambridge from alternative locations, and causes occupiers to either stay in sub-optimal space, or take smaller units in order to meet their business needs. All of which negatively impacts on the functioning of the I&L market (and therefore the wider economy) of Greater Cambridge.

6.6.2 The application proposals are ideally placed, given the Subject Site's scale and excellent locational credentials, to respond to the full spectrum of demand from occupiers (including local businesses) seeking premises from which to serve Greater Cambridge.

LICHFIELDS

Appendix 7: West Suffolk Local Plan Examination in Public and Inspector's Report (1 July 2025), Relevant Extracts (pages 1, 5, 9, 23-24 and 60-61)

APPENDIX A

The Planning Inspectorate

Report to West Suffolk District Council

by
Rosalyn Kirby BA (Hons) DipTP MRTI
and
William Fieldhouse BA (Hons) MA MRTPI

Inspectors appointed by the Secretary of State

Date: 1 July 2025

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the West Suffolk Local Plan

The Plan was submitted for examination on 24 May 2024

The examination hearings were held between 5 November 2024 and 11 December 2024

File Ref: PINS/F3545/429/1

Non-Technical Summary

This report concludes that the West Suffolk Local Plan provides an appropriate basis for the planning of the District, provided that a number of main modifications are made to it. West Suffolk Council has specifically requested that we recommend any main modifications necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal and habitats regulations assessment of them. The main modifications were subject to public consultation over a six-week period in March and April 2025. In some cases we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment, and all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Amend the plan period from 2023-2040 to 2024-2041.
- Amend policy SP9 and key diagram to clarify the spatial strategy.
- Update the minimum housing requirement from 806 to 765 homes per year to reflect latest local housing need calculated using the standard method.
- Update the total housing land supply (14,875 homes) to take account of the latest information for the modified plan period 2024-2041 (from 15,486 homes 2023-2040).
- Update the employment land requirement to 86 hectares for the modified plan period 2024-2041 (from 63 hectares 2023-2040).
- Update the total employment land supply (90 hectares) to take account of the latest information for the modified plan period 2024-2041 (from 86 hectares for 2023-2040).
- Delete the restriction on large scale logistics development over 9,000 sqm.
- Amendment to policy SP15 to ensure it is effective in securing the provision of transport and other infrastructure improvements needed to support development.
- Amend the requirements relating to site allocations to ensure that they are justified, effective and consistent with national policy.
- Amend various policies to reflect the findings of the Habitats Regulations Assessment.
- Various amendments to ensure the Plan provides an effective strategic framework for neighbourhood plans.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

15. The main strategic matters addressed during the preparation of the Plan were:

- Strategic pattern and scale of growth, including housing and employment land needs.
- Road and rail implications of cross-boundary routes and projects.
- International, national and locally important conservation sites.
- Water supply and quality.
- Energy supply and capacity.
- Education and primary health care.
- Police and emergency services.
- Tourism, leisure and culture facilities.
- Horse racing industry.
- RAF Mildenhall and RAF Lakenheath.

16. The main methods of engagement used by the Council included inception meetings in 2021; consulting all relevant local planning authorities and prescribed bodies at each stage of the Plan and during the preparation of evidence; bespoke meetings and workshops on particular issues; and preparing position statements at key stages.

17. Whilst a number of strategic matters remained unresolved at the time the Plan was submitted for examination, including in relation to the strategic road network and habitats regulations assessment, that was a consequence of representations made at regulation 19 stage rather than a failure on the part of the Council to try to address them earlier in liaison with the relevant bodies during the preparation of the Plan. In so far as those unresolved issues relate to soundness, we deal with them under the relevant main issues.

18. Demand for large scale strategic logistics development in the wider sub region was considered during the employment land review carried out in 2021 and 2022 and the update to this in 2024. That involved consultation with other relevant local planning authorities who also had opportunities to discuss the matter at various liaison meetings during the preparation of the Plan. Whilst, for reasons set out later in this report, we do not consider the restriction on storage and distribution uses over 9,000 sqm floorspace to be justified, all of the relevant authorities are content that the Council effectively engaged with them in relation to that strategic matter and we agree that was the case.

19. We are, therefore, satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis with relevant authorities and bodies in the preparation of the Plan and that the duty to co-operate has been met.

and summarises the reasons why each is not allocated. That makes clear that some omission sites are suitable and available but were not allocated as they are not required to meet the identified need for housing and economic development.

76. It is of course the case that different allocations could have been chosen if a different selection methodology had been used, including taking a more flexible approach to sites that did not adjoin but were reasonably well related to settlements. Similarly, different allocations could have been selected if greater weight had been given to previously developed land, including that with existing E class uses that could be converted to residential; or to land being promoted for development that could help to deliver additional capacity at a particular school. A more refined approach could also have been taken to consideration of whether part of a proposed site was suitable even if other parts were at risk of flooding or unsuitable for other reasons.

77. However, the fact that alternative methods could have been used, and / or different judgements made, does not mean that the Council's approach was not reasonable. We are satisfied that the methodology used was appropriate and justified as it was consistently applied with judgements made on the basis of proportionate, relevant evidence in the context of a sound spatial strategy. Furthermore, for the reasons set out under the previous main issue it has resulted in a distribution of development proposed in the Plan that is consistent with the spatial strategy and national policy. We consider later in this report whether each of the allocations is justified and whether the Plan identifies a sufficient quantity and mix of sites to ensure that the identified need for development can be met in the plan period.

Conclusion

78. We are therefore satisfied that the allocations in the Plan were selected using an appropriate methodology based on proportionate, adequate, up-to-date evidence.

Issue 4 – Is the Plan informed by a proportionate and adequate assessment of viability consistent with national policy and does the evidence demonstrate that the total cumulative cost of all relevant policies will not undermine the deliverability of development?

79. A viability assessment was carried out between 2021 and 2024 to inform the preparation of the Plan[32]. The assessment adopted a residual land value approach, making informed assumptions about development costs (including the cumulative cost of meeting all national standards and policy requirements in

[32] Viability Evidence and Assessment, Dixon Searle Partnership [B9a to B9g].

the Plan), sales values, benchmark land values and developer profits. The development typologies reflect the types of development proposed in the Plan, and a number of specific allocation proposals were tested. Different scenarios were assessed, sensitivity tests undertaken, and consultation carried out with representatives from the development industry, site promoters and affordable housing providers.

80. Some representors have provided their own evidence suggesting that costs associated with construction, section 106 contributions, biodiversity net gain, finance, and professional fees could be higher; sales values could be lower; developer profits should be higher; and benchmark land values should be higher. However, some of the higher costs suggested fall within the range of scenarios tested, and all of the assumptions made in the assessment are based on relevant national or locally specific data and analysis. Overall, we are satisfied that the assessment was carried out in accordance with national planning guidance[33] and the assumptions made were reasonable based on relevant, up to date, adequate evidence.

81. The viability assessment did not specifically consider large scale logistics development. As the submitted Plan includes a policy seeking to prevent storage and distribution uses comprising more than 9,000 sqm of floorspace that is understandable. Whilst we have modified the Plan to remove that restriction as set out under Issue 10, such developments are not specifically proposed nor are they necessary to achieve the Plan's objectives. We do not, therefore, consider any further viability evidence is needed in that regard. Furthermore, given the strong market demand that we were told exists for such types of development in the wider region we assume that if a planning application were to be put forward it would be on the basis that the proposal is viable.

82. The viability assessment indicates that the total cumulative cost of all relevant policies, including the requirements for affordable housing, will not undermine the viability of the development that the Plan assumes will take place during the plan period.

Conclusion

83. We therefore conclude that the Plan is informed by a proportionate and adequate assessment of viability consistent with national policy which demonstrates that the total cumulative cost of all relevant policies will not undermine the deliverability of development.

[33] PPG ID:10.

Finally, the requirement relating to flood risk needs to be modified to be consistent with national policy and ensure that residents are safe [**MM36**]. The reasoned justification to policy LP24 needs to be modified accordingly, and to reflect the modification to policy SP10 described earlier in this report [**MM36**].

Conclusion

248. Subject to the main modifications described above, the Plan identifies the need for additional traveller accommodation based on robust up-to-date evidence and identifies sufficient opportunities to ensure that those needs can be met over the plan period.

Issue 10 – Are the policies relating to economic development and town centres justified and consistent with national policy, and will they be effective in ensuring that identified development needs can be met in appropriate locations throughout the plan period?

Strategic employment (policy SP12)

249. In addition to modifying policy SP12 to reflect the revised plan period and updated evidence of employment need as described under main issue 1, the parts of the policy and reasoned justification that repeat or summarise other policies in the plan, including allocations, need to be deleted or amended to avoid ambiguity and inconsistency and thereby ensure effectiveness. Furthermore, to provide clarity and conciseness, the parts of policy SP12 relating to existing general employment areas and rural employment areas need to be moved to a separate strategic policy which we consider below.

250. We concluded under main issue 1 that there is significant demand for large scale strategic logistics development in the wider sub region, and an identified need for 35 hectares in West Suffolk. The restriction on such developments comprising more than 9,000 sqm is not therefore justified or consistent with national policy which recognises the critical role that such development plays in enabling an efficient, sustainable and effective supply of goods for consumers and businesses as well as contributing to local employment opportunities[62]. Policy SP12 therefore needs to be modified to allow large scale logistics development on suitable allocations and employment areas, provided that it is consistent with national policy and does not prevent more localised needs being met.

[62] PPG ID: 2a-03120190722.

251. Subject to the modifications [**MM43**], we are satisfied that policy SP12 is justified and clearly sets out the overall strategic approach to the provision of employment land over the Plan period.

General employment areas and rural employment areas

252. To ensure that the established employment areas are clearly set out in the Plan, a new strategic policy and reasoned justification need to be included. This identifies the 26 general employment areas and 20 rural employment areas and defines the range of identified employment uses that are likely to be supported, along with criteria against which proposals will be assessed against. The new policy also clearly protects these areas for employment uses to address local and sub regional employment needs [**MM44**].

Safeguarding existing employment land and businesses

253. Policy LP36 sets out more detailed development management criteria intended to protect and safeguard the defined general and rural employment areas, sites allocated for employment uses, and land and existing businesses which are not specifically identified in the Plan.

254. Clarification on marketing criteria is necessary to accord with the flexibility that the NPPF expects, and as the policy relates to all employment sites the reference to strategic sites in the last paragraph of the policy needs to be deleted [**MM45**].

255. Subject to these modifications we are satisfied that the policy is justified and will be effective in safeguarding employment uses to accommodate the employment needs of the District.

Sites allocated for employment development

AP3 North of Rougham Tower, Bury St Edmunds

256. This 63 hectare mixed use allocation includes 20 hectares of employment land. To be consistent with modified policy SP12, the restriction on storage and distribution uses needs to be deleted. The requirement relating to walking and cycling routes should be deleted as this matter is addressed in more detail in policy LP57. The provision of a landmark building upon the site should not be restricted to a certain area but rather be part of the design strategy for it and the policy should be modified to address this point [**MM69**].

257. Subject to the modifications we are satisfied that policy AP3 will be effective in delivering employment land within the Plan period.

Appendix 8: Review of Viability for Policy J/AW (Lichfields, September 2026)

LICHFIELDS

Appendix 8 - Review of viability of draft Policy J/AW (Lichfields)

Policy J/AW(2) of the Greater Cambridge Plan contains a requirement for new Industrial and Storage developments over 2,500sqm to provide a minimum of 10% of net additional floorspace as affordable workspace at a minimum of 20% below prevailing market rents. This policy requirement is supported by evidence contained in the Greater Cambridge Local Plan Viability Report, which was prepared by Aspinall Verdi and published in July 2026. The report states (at paragraph ES32) that *"all typologies are viable for which this policy would apply."* Having reviewed the viability evidence in detail, our view is that this conclusion does not represent a reasonable representation of the viability position for all forms of commercial development across the Greater Cambridge area.

We set out the basis for this concern below.

Insufficient number and range of site typologies

A total of 18 commercial site typologies were considered by the assessment (as detailed in Table 5.27 of the Viability Report). Of these,

1 Two industrial (B2/B8) typologies were considered; these relate to greenfield industrial park developments and the provision of 2,500sqm and 5,000sqm (GIA) floorspace.

2 One logistics/distribution warehouse (B8) typology was considered; this relates to a greenfield industrial park developments and the provision of 10,000sqm (GIA) floorspace.

In each case, the assessment assumes a plot ratio of 0.6, such that the sites to which these figures relate would range from 0.42ha to 1.67ha.

We are concerned that this does not in any way represent the full range of development proposals that are likely to come forward in Greater Cambridge, nor represent many of the development proposals planned to come forward in the GCLP. This oversight has implications on strategic allocation sites, for example, Site allocation 'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)' in the draft GCLP for a major employment site of 220,000sqm of B2/B8 use. Given the importance of this strategic site to the draft Plan strategy, we would expect a strategic B2/B8 development site to have been tested as a specific typology. The typologies tested are entirely unrepresentative of the form of development anticipated by Policy S/SHF as well as other scales of industrial and logistics development and other strategic employment site allocations.

We consider that the range of site development typologies are therefore not sufficient to determine the viability of commercial development across the Plan area.

Inadequacies in input assumptions

Tables 5.25 and 5.26 of the Viability Assessment set out the input assumptions that were used to inform analysis undertaken by Aspinall Verdi. We would express the following concerns about these inputs:

1 Build costs

Building Cost Information Service ('BCIS') data has been adopted in respect of build costs. We agree that this is an appropriate source of information. For industrial development, the assessment adopts a base build cost of £954/sqm. A review of the BCIS data for industrial development with a locational

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adjustment for Cambridgeshire highlights a significant range from £474/sqm (livestock buildings) up to £5,036/sqm (Data Centres). The adoption of a blanket build cost is not appropriate as it entirely fails to capture the full range of industrial premises that are likely to be developed in Cambridgeshire.

Furthermore, we note that the average base build cost across this sample is £1,530/sqm, or £1,368/sqm when data centres are omitted. These figures are between 43% and 60% higher than the figure that has been adopted by the Viability Appraisal. The implication of this is that Aspinall Verdi has very substantially under-estimated the build costs associated with industrial development in Greater Cambridge.

2 External and abnormal costs

Whilst we agree that application of BCIS costs is a reasonable (and consistently applied) basis for viability assessment, it is crucial to recognise that these standard build cost figures primarily include the basic construction and structural costs of a building, including a contractor's preliminaries, overheads. They do not include any allowance for external works (e.g. landscaping, external drainage, boundary walls, and paving outside the building footprint) or abnormal works (e.g. to address exceptional site conditions, heavy demolition, contaminated land remediation, or unusual substructure requirements). Separate allowances should therefore be applied in respect of these components.

No reference is made in Table 5.26 to any adjustment for external or abnormal costs. We note that the Council's viability evidence that informed its CIL charging schedule included an allowance of 10% for externals with respect to industrial development. Whilst we believe a figure of between 15% and 20% to represent a typical allowance for industrial development, the fact that the CIL evidence base included any adjustment for external represents an acknowledgement on the part of Greater Cambridge's advisers that this adjustment is a necessary input to viability assessments. There is no explanation as to why Aspinall Verdi adopted a divergent approach to BNP Paribas (author of the CIL viability assessment) or why this difference was accepted by the local authorities.

The viability assessment similarly fails to include any allowance for abnormal costs. It is recognised that BCIS figures do account for a baseline level of site works (including site set up and standard foundations), but these cannot be reasonably described as constituting "abnormal" costs. Critically, BCIS does not cover any site-specific abnormal costs.

It is recognised that it is difficult to provide a blanket assumption regarding site-specific abnormal costs and that every site is different. However, abnormal costs can typically be in the order 20% of base build costs. On an industrial and logistics park development, such as that anticipated by draft allocation S/SHF, the requirement for significant infrastructure costs – including, but not limited to highways, utilities, ecology, and groundworks – means that abnormal costs could represent an even greater proportion of build costs.

A failure to have adequate regard for the potentially significant cost components of external and abnormal works is that the costs of development is almost certain to be significantly under-estimated, resulting in the viability position being over-stated.

3 Inadequate allowance for contingency

Table 5.26 indicates that an allowance of 3% has been made for contingencies on greenfield commercial developments and that 5% has been allowed in respect of brownfield sites. The basis for these figures is not known but the commentary states that *"more site due diligence* [is] *required"*. We agree that an

allowance should be made to account for unforeseen costs that arise throughout the development period. A rate of 10% represents a typical allowance in respect of this.

The importance of an adequate contingency allowance becomes even more significant in the absence of any allowance for abnormal costs. The inclusion of contingency costs is also particularly relevant in the current economic context. For example, in the period from 2021 to 2025, developers had to account for an exponential and unexpected increase in build costs of c.20% (between October 2021 and 2025). Given that current geo-political uncertainties have the potential to result in further increases to inflation and interest rates, it is more important than ever to ensure that sufficient flexibility is built into the viability modelling that underpins the Local Plan.

The implication of this is that it is not possible to draw robust conclusions in respect of the viability of industrial and logistics development in Greater Cambridge, and the ability of this form of development to sustain affordable workspace. The global geo-political and market uncertainties reinforce this finding and place even greater emphasis on the importance of making sufficiently realistic allowances for all cost additions to a standard BCIS cost, and then add in an appropriate contingency, in this context.

Rental values and yield rates

Table 5.24 of the Viability Assessment sets out the values and yield assumptions that have been applied in respect of different types of commercial properties. It applies the following in respect of industrial development:

1 Industrial (prime): £18/sqft (£193.76/sqm) / yield: 5.5%; and,

2 Industrial (secondary): £15/sqft (£161.46/sqm) / yield: 6.5%.

A review of CoStar data comprising 546 industrial units throughout Greater Cambridge identifies a significant range of actual rental values from £54.03/sqm up to £592.02/sqm[1]. Across the sample of premises with actual rental rates provided, an average rental rate of £144.87/sqm is identified. This is important in highlighting the significant variation in rental levels for different types of industrial property. Given the range of premises that would fall within the category of 'Industrial use (B2/B8) including data centres, it is neither possible nor appropriate to apply just two rental values for this category of development across the entire Plan area.

Another core assumption within the viability assessment modelling is an assumed yield rate of 5.5% or 6.5% depending on market area. Whilst a prime yield rate of 5.5% is considered acceptable at present in the context of prime industrial developments it should be noted that 10-year gilt yields have recently risen to their highest levels since the 2008 financial crisis[2]. The implication of rising 10-year gilt yields could lead to upward trending commercial yields. Should prime yields increase, this would have a negative implication on the Gross Development Value and worsen the viability position of schemes. Taken together, both factors would worsen the viability position across industrial development relative to the adopted assumptions.

[1] CoStar "Industrial" category includes both B2 and B8 Use Classes (exported March 2026)
[2] UK Debt Management Office: Historical Average Daily Gilt Yields data (exported September 2026)

Bidwells[3] has provided information regarding appropriate average rental values for new build storage and distribution units in Greater Cambridge. This highlights that rental values vary by scale of development. Bidwells advise that smaller units (up to 30,000 sqft) could typically be expected to command rental values of £15.00/sqft (£161.46/sqm), whereas larger units (over 100,000 sqft) could achieve £13.00/sqft (£139.93). This range is between 17% and 28% below the figure set out in the Viability Assessment.

The impact of these differences can be understood through a review of the property value of each rental value/yield combination assumption made in the Councils' evidence base, namely:

1 A rental income of £193.75/sqm and a 5.5% gross yield would generate a property value of **£3,522.85**; and,

2 A rental income of £161.46/sqm and a 6.5% gross yield would generate a property value of **£2,484/06**.

By contrast, a rental income of £139.93/sqm (from Bidwells evidence, Appendix 9) and a 5.5% gross prime yield (from the Council's evidence base) would generate a property value of **£2,544.00/sqm** – this is 28% below the level associated with the figures contained in the Council's Viability Review.

Further testing must be undertaken to reflect more appropriate rental values and yield assumptions, and to have regard to the differences in rental values by type of premises and area. Without this, it will not be possible to achieve an accurate understanding in respect of the viability of industrial development in Greater Cambridge.

Conclusion

As set out above, we do not concur with the conclusion of the Viability Assessment that was prepared by Aspinall Verdi that *all typologies are viable for which this policy* [J/AW] *would apply"*. By way of summary, this position is based on the following concerns:

1 The **assessment of viability is based on the testing of an insufficient number and range of development site typologies**. Critically, no consideration has been given to the viability implications of the policy in respect 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 of 220,000sqm of B2/B8 use or other strategic employment site allocations.

2 The **assumptions** that have been applied in respect of **costs** are **inadequate** as they:

a Under-estimate construction costs;

b Fail to make any provision for external and abnormal costs; and,

c Under-estimate contingency costs.

3 The **assumptions** that have been made in respect of **rental values overestimate** the gross development **value** of industrial development.

[3] Bidwells are a leading real estate adviser with significant expertise in the industrial and logistics property market across Cambridgeshire. The team has extensive experience in managing major industrial instructions across the region and regularly provide research insights into the market performance through its Cambridge Industrial Databook publication.

The implication of these shortcomings is that **it is not possible to reasonably conclude that the requirement for the provision of affordable workspace would not undermine the viability of commercial development in Greater Cambridge**.

We do not consider that Policy J/AW is justified, as it is not based on clear and proportionate viability evidence; it also fails to have regard to reasonable alternatives. In addition, we consider that the policy is not effective as it would undermine the deliverability of commercial development.

Appendix 9: Evidence of Rental Values, prepared by Bidwells (September 2026)

Joshua Hymer

Subject: FW: Greater Cambridge Local Plan Viability for Affordable Workspace -produced by Aspinal Verdi in July 2026 [LICH-DMS.FID215049]

From: Walter Scott [redacted]
Date: Friday, 25 September 2026 at 12:36
To: GRAEME COSGROVE [redacted]
Subject: Greater Cambridge Local Plan Viability for Affordable Workspace -produced by Aspinal Verdi in July 2026

Hi Graeme

I understand that Aspinal Verdi in their Affordable Workspace viability assessment include an assessment of prime B2/B8 Storage and Warehousing Rents at a level of £194 sq m or £18 psf.

This appears to be very broad-brush and doesn't account for nuances in the market in terms of quantum of space. For example, in our experience, this would be grossly overstating the levels of rents that would be achievable for new build storage and distribution units greater than say, 50,000 sq ft, in Greater Cambridge.

In our opinion, more appropriate rental levels would be in the region of £15.00 psf for units up to 30,000 sq ft, £14.00 psf for units between 30,000 and 100,000 sq ft and £13.00 psf for units over 100,000 sq ft.

I hope this is of assistance.

Kind regards

Walter

BIDWELLS

Walter Scott BSc (Hons) MSc MRICS

Partner, Industrial & Logistics Agency

[redacted]

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