CERES PROPERTY

CONSULTATION

RESPONSE

Greater Cambridge Local Plan

Regulation 19

Cambridge Edge Business Park

On behalf of Orchestra Land

September 2026

CERES PROPERTY

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1. EXECUTIVE SUMMARY

1.1 These representations are submitted on behalf of Orchestra Land in response to the Greater Cambridge Local Plan Proposed Submission Regulation 19 consultation. They relate to approximately 24 hectares of land east of Shepreth, south of Foxton and adjacent to the A10, promoted as Cambridge Edge Business Park (the Site).

1.2 The representations retain the central case advanced at Regulation 18, but are updated to address the Proposed Submission Plan, the evidence base and the further policy and transport work prepared for the Site. The Site provides an opportunity for a modern mid-tech and innovation-led employment park, with flexible premises capable of accommodating office, research and development, prototyping, testing, light manufacturing and related storage functions.

1.3 Orchestra Land supports the Plan's objective to maintain Greater Cambridge's internationally significant innovation economy and welcomes the recognition within the evidence base that the area lacks sufficient manufacturing capacity and requires flexible mid-tech accommodation for businesses moving from research and development into commercial production. However, the Plan does not translate that identified need into a sufficiently diverse, deliverable and spatially balanced portfolio of employment allocations. The omission of the Site therefore limits the effectiveness and resilience of the employment strategy.

1.4 The Site is located outside the Cambridge Green Belt, directly adjoining the A10 corridor and between Shepreth and Foxton railway stations. It can complement rather than compete with the established Cambridge cluster by providing accommodation for firms that need more flexible and production oriented space than conventional offices or laboratories. Its allocation would also reduce pressure on existing industrial stock, which is increasingly occupied by mid-tech businesses despite continuing local requirements for warehousing and light industrial space.

1.5 The Site is capable of supporting a genuinely multi-modal development. It lies approximately 1.2 to 1.3 kilometres from Shepreth and Foxton stations, is served by a bus route on the A10, and is positioned alongside the emerging Melbourn/A10 Greenway corridor. A package of site access, crossings, active-travel routes, bus improvements, station cycle parking and an on-site mobility hub can materially improve existing conditions and promote modal shift.

1.6 The principal modification sought is the allocation of the Site for a flexible mid-tech and innovation-led employment park, supported by a bespoke site policy and consequential amendments to Policy

S/DS, Policy J/NE, the employment land schedule, Key Diagram and Policies Map. The policy should allow complementary facilities required to create a sustainable employment destination, including the potential for residential, secure a comprehensive transport and green-infrastructure strategy, and preserve sufficient flexibility to respond to occupier requirements and changing technology sectors.

2. INTRODUCTION

2.1 Ceres Property submitted representations at Regulation 18 in January 2026 in support of the Site's allocation for employment development. Those representations were accompanied by a Vision Document and explained the need for additional mid-tech accommodation, the Site's strategic location and its ability to deliver substantial economic, environmental and transport benefits.

2.2 The purpose of this updated representation is to consider whether the Proposed Submission Plan is legally compliant and sound, identify the relevant policy provisions and explain the modifications required. At Regulation 19, the key issue is whether the Plan is positively prepared, justified, effective and consistent with national policy. The Site is advanced as an additional allocation and as a specific modification capable of remedying shortcomings in the submitted employment strategy.

2.3 The Site extends to approximately 24 hectares of agricultural land on the eastern side of Shepreth, south of Foxton and immediately adjoining the A10. Most of the Site lies within Flood Zone 1, with higher flood-risk land confined principally to part of the northern boundary. Existing trees and landscape features provide a framework for a substantial green and blue infrastructure network. The Site is outside the Cambridge Green Belt.

2.4 The promoted concept is for a flexible mid-tech and innovation-led employment park providing a mix of Use Classes E(g), B2 and B8 accommodation appropriate to modern businesses along with an option including residential. Complementary uses may include a mobility hub, café and limited retail, leisure and hospitality provision needed to support employees and create a sustainable employment destination. The illustrative options provided within the enclosed Vision Document also demonstrate that the Site can accommodate extensive open space, biodiversity enhancements and sustainable drainage.

2.5 Whilst the principal purpose of the proposed development is to meet the identified need for mid-tech and innovation-led employment accommodation, the scale and characteristics of the Site also provide an opportunity to incorporate a proportionate residential element as part of a comprehensive employment-led mixed-use development. A proportionate residential element would support the Plan's objective of locating homes close to jobs and sustainable transport infrastructure.

3. NEED FOR MID-TECH

3.1 The Proposed Submission Plan is organised around seven themes and includes strategic policies for jobs and homes, the development strategy and a suite of detailed jobs policies. Of particular relevance are Policy S/JH: New Jobs and Homes, Policy S/DS: Development Strategy, Policy J/NE: New employment and development proposals, Policy J/AW: Affordable workspaces and creative industries, Policy J/PB: Protecting Existing Business Space and Policy J/EP: Supporting a range of facilities in employment parks.

3.2 Policy S/DS establishes the overarching development strategy for Greater Cambridge, directing growth towards the most sustainable locations with access to employment, services, public transport and active travel opportunities. The policy seeks to concentrate new homes and jobs within Cambridge, at the edge of Cambridge and within strategic new settlements, whilst protecting the Green Belt and ensuring development is supported by the necessary infrastructure.

3.3 The Regulation 19 Jobs Topic Paper identifies Greater Cambridge as the Global City Cambridge Opportunity Zone. Its priority sectors include life sciences, advanced manufacturing and materials, digital technologies, defence, agri-food and technology, and energy and clean-tech. The evidence also recognises that the area is a major driver of research and development but lacks significant manufacturing capacity, with an ambition to enable more firms to design and manufacture within the region.

3.4 The Jobs Topic Paper further records that the commercial market is not delivering sufficient affordable and flexible workspace for smaller businesses, start-ups, scale-ups and industrial occupiers. It identifies a specific need for flexible R&D and mid-tech accommodation within science parks, business parks and strategic innovation locations, together with strong demand for smaller industrial units, workshops and maker space from advanced manufacturing businesses and firms moving from R&D into production.

3.5 The Iceni Affordable Workspace Study (June 2026) defines mid-tech as flexible accommodation that combines:

- Product development
- Testing
- Light manufacturing / production
- Storage and distribution
- Ancillary office space

3.6 The Study acknowledges that mid-tech occupiers tend to arise from university and science park environments and benefit from being close to those ecosystems. Rural locations are generally sub-optimal, particularly where sustainable transport options are limited. Edge-of-urban locations with strong connectivity are considered the optimal location for mid-tech start-up and scale-up space.

3.7 The evidence therefore establishes both the strategic economic importance of the relevant sectors and a tangible shortage of the premises they require. The difficulty is that the Proposed Submission Plan does not adequately convert that evidence into a broad and deliverable supply of specifically suitable mid-tech sites. A policy framework that recognises a need but relies principally on existing locations or a limited number of major strategic allocations is vulnerable to delay, constrained availability and competition between different employment sectors.

3.8 The evidence also highlights a disconnect between Greater Cambridge's exceptional research and development strengths and the availability of suitable space for businesses seeking to commercialise innovation and scale production activities. While the area has a well-established portfolio of science parks and laboratory accommodation, there remains a shortage of flexible premises capable of accommodating the combination of office space, research and development, prototyping, testing, light manufacturing, storage and distribution functions required by growing mid-tech businesses. As a consequence, there is a risk that firms may be constrained in their growth or forced to relocate outside the area as they progress from research and development into commercial production. The delivery of additional mid-tech accommodation is therefore critical not only to supporting business growth, but also to retaining investment, jobs, skills and innovation within Greater Cambridge.

3.9 The provision of additional mid-tech employment land would also help diversify the employment portfolio across Greater Cambridge. Reliance on a limited number of established science parks and strategic employment locations risks constraining market choice and reducing flexibility for occupiers with specific operational requirements. A broader range of employment locations would improve resilience within the commercial property market, increase opportunities for inward investment and provide businesses with greater choice of accommodation as they expand and evolve.

3.10 The evidence further indicates that mid-tech occupiers are increasingly occupying conventional industrial premises due to the limited availability of purpose-designed accommodation. This places pressure on existing industrial stock that continues to serve important warehousing, logistics and local business functions. The delivery of new, purpose-built mid-tech accommodation would therefore provide wider economic benefits by helping to retain an appropriate supply of industrial

premises for other sectors whilst ensuring that innovation-led businesses have access to accommodation suited to their operational requirements.

3.11 The Plan is not justified unless the Councils demonstrate that the selected employment portfolio is the most appropriate strategy when assessed against reasonable alternatives. The Site is a clear reasonable alternative because it is available, outside the Green Belt, strategically located on the A10 corridor, capable of delivering purpose-designed flexible accommodation and supported by a comprehensive transport and landscape strategy.

4. THE CASE FOR ALLOCATION

4.1 These representations are supported by an accompanying Vision Document and Landscape and Visual Overview, which provides further detail on the Site, the proposed development concept and the Site's deliverability. The Vision Document demonstrates how the Site can accommodate a high-quality, landscape-led employment park focused on mid-tech and innovation-led sectors, supported by appropriate transport infrastructure, green infrastructure and complementary facilities. It further illustrates the Site's capacity to deliver the flexible employment accommodation identified as necessary within the Council's evidence base.

4.2 Mid-tech businesses commonly require a combination of office, research and development, prototyping, testing, production, storage and distribution activities within adaptable buildings. They do not fit comfortably within a conventional office or laboratory environment, but nor do they necessarily require a traditional heavy industrial estate. Their requirements include flexible floorplates, servicing, loading, power capacity, yard space and the ability to expand as products move from research through commercialisation and production.

4.3 The Site would directly address this market gap by providing a purpose designed environment. It would offer grow-on and production space for firms that might otherwise leave Greater Cambridge when they outgrow laboratory or office accommodation. This would support business retention, innovation-led growth and the development of regional supply chains.

4.4 A dedicated mid-tech location would also relieve pressure on existing industrial stock. The previous employment evidence identified that mid-tech occupiers are increasingly taking conventional industrial premises. Providing new, purpose-designed mid-tech accommodation would therefore deliver a wider market benefit beyond the businesses occupying the Site.

Strategic Location

4.5 The Site occupies a strategic position between Cambridge and Royston, with immediate access to the A10 and convenient links towards the M11 corridor. It sits within a wider employment geography containing established business parks, innovation centres and industrial estates and can operate as a complementary southern component of the Cambridge economic cluster.

4.6 Unlike a number of potential growth locations around Cambridge, the Site is outside the Green Belt. Allocation would therefore enable the Plan to diversify its employment land supply without requiring Green Belt release. The Site's scale also enables a comprehensive approach to plot sizes, landscape

buffers, ecological enhancement, drainage, movement and supporting facilities rather than piecemeal development.

4.7 The Vision Document identifies a concentration of existing business parks, industrial estates and innovation centres within the surrounding area, including Duxford Business Park, Vision Park, The Way at Fowlmere, Orchard Business Centre, Sawston Park and a range of other employment locations. The Site is therefore capable of functioning as a natural extension of the wider Cambridge employment market, providing additional capacity in a location that already exhibits strong economic and functional relationships with existing centres of employment. Its allocation would complement rather than compete with established employment clusters and would contribute to the diversification and resilience of the Greater Cambridge economy.

Deliverability and Economic Benefits

4.8 The Site is available and capable of progressing promptly. Orchestra Land is willing to work with the Councils to refine the proposals for the Site and bring forward an application in due course.

4.9 The illustrative masterplan work within the Vision Document demonstrates the potential for the Site to deliver a significant number of jobs within Greater Cambridge. Depending upon the final occupier mix and floorspace composition, the employment-led option is capable of supporting between approximately 1,000 and 1,600 jobs across a range of sectors including advanced manufacturing, technology, research and development and associated business services. The Site therefore represents a substantial economic development opportunity capable of making a meaningful contribution towards the employment objectives of the Local Plan.

4.10 The allocation would diversify the Plan's employment offer, increase competition and choice in the commercial land market, and provide resilience if other large or infrastructure-dependent locations are delayed. It would also support the Plan's objectives for inclusive economic growth by enabling a wider range of business types and employment opportunities than a strategy focused predominantly on office and laboratory accommodation.

4.11 The Vision Document also demonstrates the flexibility of the Site to accommodate a range of occupier requirements over time. The proposed development is capable of supporting office, research and development, prototyping, testing, light manufacturing and associated storage and distribution uses within adaptable building formats. Such flexibility is particularly important in a rapidly evolving innovation economy, enabling businesses to remain within Greater Cambridge as they grown and evolve.

4.12 While the principal purpose of the proposed development is to meet the identified need for mid-tech and innovation-led employment accommodation, the scale and characteristics of the Site also provide an opportunity to incorporate a proportionate residential element as part of a comprehensive employment-led mixed-use development. The illustrative masterplan options demonstrate that residential development could be accommodated within a defined part of the Site without undermining the delivery, operational requirements or future expansion of the employment uses.

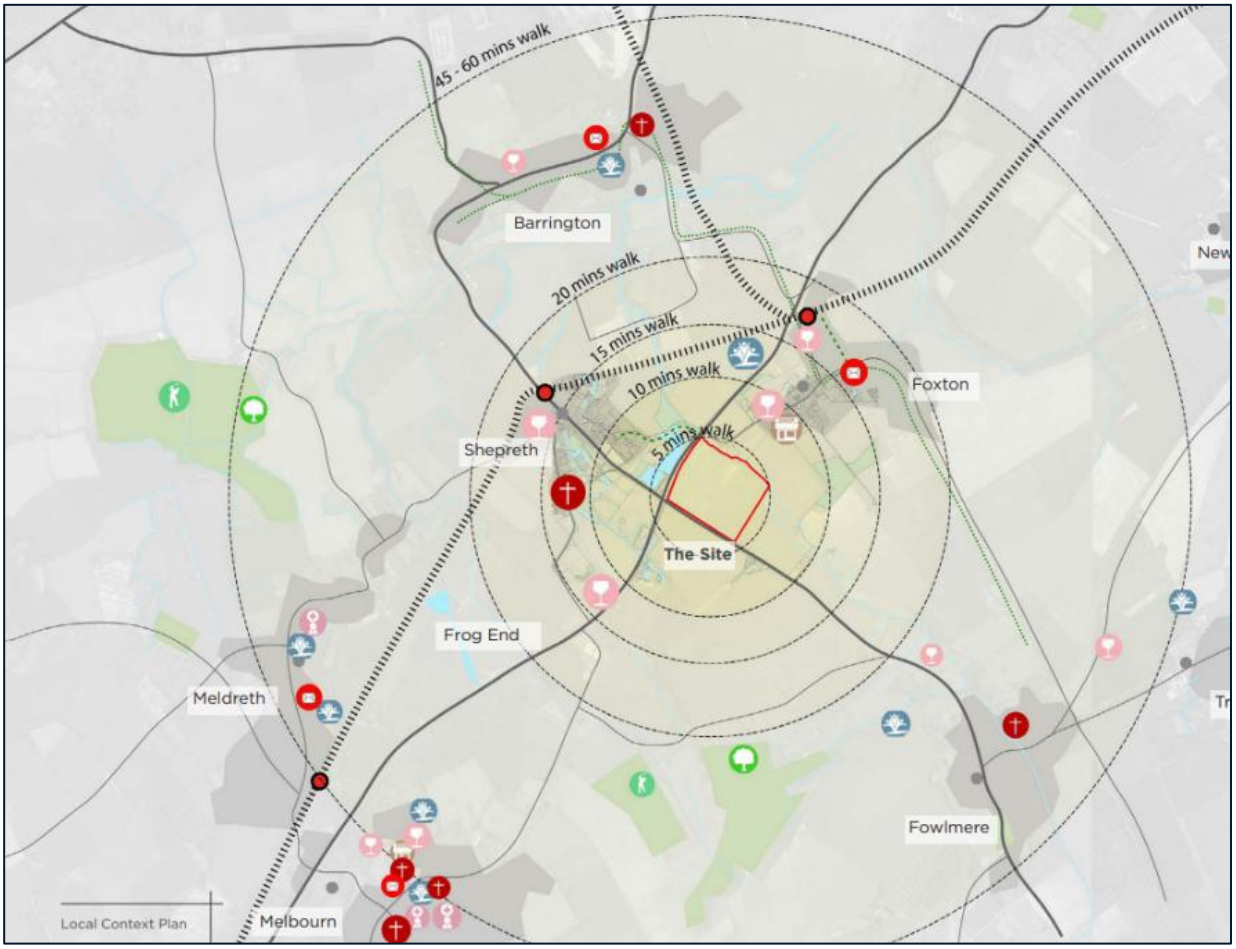
4.13 The proposed employment-led mixed-use development would create a sustainable and well-integrated community by locating homes alongside employment opportunities, supporting facilities, open space and sustainable transport infrastructure. This would enable residents to live close to jobs, services and amenities, reducing the need for longer-distance commuting and encouraging walking, cycling and public transport use. The residential element would also support the vitality and viability of the wider development by helping sustain on-site facilities such as the mobility hub, café, retail, leisure, wellbeing and community uses, while creating activity throughout the day and evening. Together, the co-location of complementary uses, strong sustainable transport connections, and proximity to Foxton and Shepreth railway stations would help create a more active, inclusive and resilient destination, consistent with the Plan's objective of locating homes close to jobs and sustainable transport links.

4.14 Accordingly, the allocation policy should retain sufficient flexibility to allow either a wholly employment-led development or an employment-led mixed-use scheme containing a proportionate residential component.

Sustainable Transport and Accessibility

4.15 The Site occupies a sustainable location between Foxton and Shepreth, with access to two railway stations on the Cambridge to London King's Cross line. Shepreth Station is approximately 1.2 to 1.3 km west of the Site, representing around a 15 to 17-minute walk or four-minute cycle journey. Foxton Station is approximately 1.3 km to the north-east, around a 16 to 18-minute walk or four to five-minute cycle journey. Both stations provide hourly services to Cambridge and London King's Cross, offering genuine opportunities for travel by rail and supporting modal shift away from private car use.

4.16 The below graphic indicates the local amenities within the vicinity of the site along with the walking distances.



4.17 The Site is also served by the No. 26 bus service, operated by A2B Bus and Coach along the A10 corridor. The nearest stopping point is approximately 320 metres south-west of the centre of the Site and provides a service towards Cambridge and Royston, currently operating at approximately two-hour intervals. The area also benefits from the expanding Tiger on Demand service, which provides pre-booked demand-responsive transport with designated stops at Shepreth Station, the Memorial and Frog End.

4.18 Walking and cycling accessibility will be further enhanced by the Melbourn Greenway improvements currently under construction along the A10 corridor. The A10 Greenway forms part of the Greater Cambridge Greenways programme and will provide a continuous route of approximately 10.5 km, linking Royston with Meldreth, Melbourn, Shepreth and Harston before continuing towards Cambridge through Trumpington Meadows and the Guided Busway. The route combines new

infrastructure with improvements to the existing network, creating safer and more convenient opportunities for walking and cycling between the Site and nearby settlements. Further detail on the Melbourn Greenway improvements are provided in the Vision Document.

4.19 Existing local connections include the footway along Fowlmere Road between the A10 and Shepreth Station, which is predominantly lit, together with the wider footway and cycle network serving Foxton, Shepreth and surrounding settlements. Development of the Site therefore presents an opportunity to reinforce these connections through high-quality pedestrian and cycle infrastructure, improved crossings of the A10, enhanced links to both railway stations and contributions towards cycle parking and public transport facilities. Collectively, these measures would integrate the Site with the established and emerging sustainable transport network and support a development in which walking, cycling and public transport are practical alternatives to private car travel.

4.20 The below graphic indicates the site's proximity and connectivity to the Foxton and Shepreth stations.



4.21 The scheme can also provide a number of improvements:

- A new site access arrangement from the A10, with cycle design and crossing provision developed in accordance with current guidance.

- New and improved pedestrian and cycle links to the A10 Greenway, Shepreth, Foxton, Fowlmere Road and both railway stations.
- Upgrading the existing A10 bus stop from its current limited condition, including shelter, accessible boarding, crossing facilities and real-time information where feasible.
- Contributions towards improved frequency, accessibility and operating days for the No. 26 service, together with integration with Tiger on Demand or an equivalent demand-responsive service.
- An on-site mobility hub including secure cycle parking, e-bike and e-scooter facilities where lawful, car-club bays, EV charging, parcel lockers, travel information and cycle-repair facilities.
- Contributions towards cycle parking at Shepreth and Foxton stations and targeted improvements to pedestrian pinch-points and lighting on routes to the stations.
- Travel-plan measures and potential shuttle or last-mile connections proportionate to occupier demand and phased delivery.

4.22 These measures demonstrate that the existing transport position is capable of improvement through development. There is thus a credible package of transport improvements capable of providing safe access, promoting active and public transport and mitigating the effects of development.

Other Considerations

4.23 The concept options demonstrate that development can be directed away from the principal area of higher flood risk and structured around existing trees, hedgerows and landscape features. The north-eastern part of the Site provides an opportunity for a substantial open-space and sustainable drainage area, while ecological enhancements could include new woodland, wetland habitat, open mosaic grassland, street trees and green roofs.

4.24 A landscape-led masterplan can create a robust edge to development, protect sensitive features and provide walking routes through a connected green infrastructure network. The scale of the Site allows operational employment requirements to be balanced with biodiversity net gain, drainage, visual mitigation and employee amenity.

4.25 Detailed matters will require assessment through the planning application process, including flood risk, drainage, ecology, landscape and visual effects, heritage and archaeology, noise, air quality and utilities. However, none of these matters have been identified as an overriding constraint that would

prevent development of the site. These matters are capable of being addressed through any site-specific policy criteria and subsequent planning application.

4.26 From a landscape perspective, the Site benefits from the absence of any national or local landscape designation. Whilst the Site lies within the open countryside between Foxton and Shepreth, the Landscape and Visual Overview confirms that it is not subject to any statutory landscape designation and does not contain landscape features of particular sensitivity within the Site itself. The Site largely comprises a single arable field and therefore provides an opportunity for development to be planned around retained boundary features, new green infrastructure and landscape enhancements.

4.27 The Landscape and Visual Overview demonstrates that visibility of the Site is not uniform across the surrounding landscape. Existing woodland blocks, shelter belts, hedgerows and tree cover provide a degree of visual containment, particularly when viewed from the south and west. Whilst the landscape is more open to the north and east, the assessment identifies opportunities for additional planting and landscape mitigation to reinforce existing boundaries and filter views of development. This indicates that any future proposals can be informed by the existing landscape framework rather than requiring the introduction of an entirely new landscape structure. Accordingly, landscape considerations do not represent a constraint to the allocation of the Site and further detailed landscape and visual assessment work will be undertaken in support of any future planning application.

5. POLICY RESPONSE

Policy S/DS: Development Strategy

5.1 Support is given to the principle of directing growth towards locations that support Greater Cambridge's innovation economy and can be served by sustainable transport. However, Policy S/DS is not justified or effective insofar as it omits a suitable and deliverable employment opportunity at Shepreth/Foxton and relies on an insufficiently diverse portfolio of employment locations.

5.2 The Site would provide a complementary form of employment growth that is not readily accommodated within city-centre or laboratory-led locations. Its allocation would strengthen the rural southern economy without dispersing conventional low-density development, because the proposal is specifically tied to the A10 corridor, two railway stations, the Greenway network and an identified strategic need for mid-tech floorspace.

5.3 A significant benefit of the Site is that it lies outside the Cambridge Green Belt whilst maintaining strong transport connectivity to Cambridge, Royston and the wider economic area. The allocation would therefore provide an opportunity to expand the employment land portfolio in a highly accessible location without requiring Green Belt release. This offers a clear and reasonable alternative capable of supporting economic growth whilst remaining consistent with the Plan's objectives of protecting the strategic function and permanence of the Green Belt.

Policy J/NE: New employment and development proposals

5.4 The objective of supporting new employment development is welcomed. However, the policy should be applied through a spatial strategy that identifies sufficient sites for the sectors and building types evidenced as necessary. Reliance on criteria-based applications outside allocations does not provide the certainty required to plan infrastructure, secure comprehensive development or attract investment in a new mid-tech cluster.

5.5 The policy and supporting text should expressly recognise that mid-tech development may require a combination of E(g), B2 and ancillary B8 uses, together with servicing, yards and complementary facilities. Such flexibility is essential because individual businesses often combine research, testing, production and storage within the same operation and their needs change as they scale.

Policy J/AW: Affordable workspace and creative industries and Policy J/EP: Supporting a range of facilities in employment parks

5.6 The recognition of affordable and flexible workspace is strongly supported. The Site is capable of providing smaller units, grow-on accommodation, maker space and managed workspace alongside larger premises. Any requirement to provide affordable workspace in additional to that proposed should nevertheless be proportionate to viability, location and the operational characteristics of mid-tech development, with flexibility over on-site provision, phasing and management arrangements.

5.7 Policy J/EP is also supported in principle. A successful employment park requires a proportionate range of supporting facilities to reduce unnecessary journeys and provide an attractive working environment. The Site allocation should therefore permit a mobility hub, café, limited retail and leisure or wellbeing uses, childcare or sports provision where justified, and other facilities demonstrably ancillary or complementary to the principal employment function.

Modifications Required

5.8 To make the Plan justified, effective and positively prepared, the following modifications are sought:

- Allocate the Site as Cambridge Edge Business Park for a flexible mid-tech and innovation-led employment development.
- Amend Policy S/DS, the employment land schedule, Key Diagram and Policies Map to identify the allocation.
- Introduce a bespoke allocation policy supporting a mix of Use Classes E(g), B2 and B8 suited to mid-tech, advanced manufacturing, R&D, prototyping, testing and related production and storage.
- Permit proportionate complementary uses and facilities that support the employment function and reduce travel demand, including a mobility hub, café and limited retail, leisure, wellbeing and childcare provision.
- Allow a proportionate residential component as part of an employment-led mixed-use scheme.

Suggested Site Allocation Policy

5.9 Policy S/CEBP: Cambridge Edge Business Park, Shepreth/Foxton

Land east of Shepreth and south of Foxton, as shown on the Policies Map, is allocated for a high-quality, landscape-led employment park focused on mid-tech, innovation, advanced manufacturing and related technology sectors. Development will provide a flexible mix of Use Classes E(g), B2 and B8, together with ancillary and complementary facilities necessary to support the principal employment function. A proportionate element of residential development may also be supported.

6. CONCLUSION

6.1 In conclusion, the emerging Local Plan and supporting evidence base identify a clear and growing requirement for flexible mid-tech employment accommodation capable of supporting businesses as they evolve from research and development into commercial production. The evidence demonstrates that Greater Cambridge's continued economic success depends not only on maintaining its world-leading innovation sectors, but also on providing the premises necessary to retain businesses, investment and skilled jobs within the area as those businesses scale and expand.

6.2 Additional mid-tech accommodation would help address an under-supplied market segment, diversify the employment land portfolio, relieve pressure on existing industrial premises and provide greater choice and flexibility for occupiers. The proposed development is particularly well placed to support long-term economic growth, business retention and innovation, whilst assisting in the delivery of the Local Plan's wider economic objectives.

6.3 Cambridge Edge Business Park is a strong deliverable additional allocation. It is outside the Green Belt, located on the A10 corridor, accessible to two railway stations and the emerging Greenway network, and capable of delivering a comprehensive employment development with substantial transport, landscape and biodiversity enhancements. It can provide the flexible space required for businesses to move from research and development into commercial production while complementing existing employment locations and protecting conventional industrial stock for other local needs.

6.4 The flexibility of the proposed development to accommodate a proportionate residential element alongside employment uses would further support the Plan's objectives of locating homes close to jobs and sustainable transport infrastructure, whilst contributing to the long-term viability and vitality of the wider development.

6.5 The Landscape and Visual Overview prepared by Aspect Landscape Planning concludes that development of the type proposed could be accommodated on the Site without resulting in significant adverse landscape or visual effects, subject to the incorporation of appropriate mitigation and enhancement measures and a detailed Landscape and Visual Appraisal.

6.6 The Site should therefore be allocated through the modifications set out above. Orchestra Land wishes to participate in the relevant Examination hearing sessions concerning the development strategy, employment land supply, mid-tech need, sustainable transport and the omission of the

Site, and remains committed to constructive engagement with the Council and relevant stakeholders.