Representations to Greater Cambridge Local Plan Regulation 19 Consultation

Hill Farm, Hill Farm Road, Whittlesford, Cambridgeshire, CB22, 4QS

September 2026

Site Address: Hill Farm, Hill Farm Road, Whittlesford, Cambridgeshire, CB22 4QS

Project Number: 7127

Client's Name: Seatonhurst Ltd

SEATONHURST

September 2026

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Issue Sheet

Revision	Date	Description	Prepared by	Checked by	Approved by
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APPENDIX 3	**NEED FOR NEW MID TECH INDSUTRIAL DEVELOPMENT IN SOUTH CAMBRIDGE (BTG EDDISONS, AUGUST 2026)**

1 Introduction

1.1.1 These representations have been prepared by Lanpro Services on behalf of Seatonhurst Ltd ('our client') in response to Greater Cambridge's Pre-Submission Local Plan Regulation 19 consultation ('Regulation 19 Local Plan').

1.1.2 The Site was not submitted through the call for sites process or promoted in response to the Regulation 18 consultation. This is because the Site was only recently purchased by our client. Consequently, there was no previous opportunity for our client to promote the Site through the preparation of the emerging Local Plan.

1.1.3 These representations therefore describe the Site and the proposed development and set out why the Site should be assessed as a reasonable alternative for employment development. In particular, the representations explain how the Site could contribute towards meeting the identified need for Mid Tech accommodation during the early part of the Plan period.

1.2 Seatonhurst Ltd

1.2.1 Seatonhurst Ltd is a property investment and development company based in Cambridge.

1.3 Regulation 19 Consultation

1.3.1 The purpose of the Regulation 19 Local Plan is to provide an opportunity for representations to be made regarding the legal compliance and soundness of the Pre-Submission Local Plan before it is submitted for independent examination.

1.3.2 The tests of soundness applicable to the Regulation 19 Local Plan are set out in paragraph 36 of the December 2024 National Planning Policy Framework ('NPPF'). A revised NPPF was published on 17 August 2026. Annex A of the August 2026 NPPF provides that plans being prepared under the new plan-making system should be produced in accordance with that Framework, while other plans should continue to be prepared in accordance with the December 2024 NPPF, subject to the transitional arrangements contained within that Framework. It is understood that Greater Cambridge intends to submit the emerging Local Plan under the legacy plan-making system by 31 December 2026. Accordingly, these representations assess the soundness of the emerging Local Plan against the tests set out in paragraph 36 of the December 2024 NPPF.

1.3.3 Paragraph 36 states that a Local Plan should be:

a) *"**Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs' and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*

b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*

c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.*

d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*

1.3.4 For the reasons set out in these representations, our client considers that the emerging Local Plan has not been demonstrated to be 'sound' in respect of its approach to meeting the identified need for Mid Tech employment accommodation. Accordingly, it is not considered that the emerging Local Plan accords with criteria b) and c) of Paragraph 36 of the December 2024 NPPF.

1.4 Structure of Document

1.4.1 These representations are structured as follows:

- Chapter 1: Introduction – This Chapter sets out the purpose and scope of these representations and provides details of our client, Seatonhurst Ltd.
- Chapter 2: Site Context and Proposal – This Chapter describes the Site, its surroundings and relevant planning designations, and outlines the proposed development.
- Chapter 3: Response to Consultation – This Chapter assesses the relevant policies and evidence underpinning the emerging Local Plan and explains why the Site should be considered for allocation for Mid Tech employment development.
- Chapter 4: Conclusion – This Chapter summarises the principal matters raised and identifies the modifications that should be made to future iterations of the Local Plan.

2 Site Context and Proposal

2.1 Site Context

2.1.1 The Site extends to approximately 7.02 hectares (ha). It is located to the north of Junction 10 of the M11, within the Parish of Whittlesford. A Location Plan identifying the Site is provided at **Appendix 1**.

2.1.2 The built-up area of Whittlesford is approximately 400m to the northeast of the Site. The City of Cambridge lies approximately 5km to the north.

2.1.3 The Site comprises two distinct areas: the 'Western Area' and the 'Brownfield Area'. The land to the north, referred to as the 'Northern Field', lies outside the Site boundary for the purposes of these representations, but is also within our client's ownership.

2.1.4 The 'Western Area' extends to approximately 2.73 hectares and comprises an open agricultural field. It is separated from the M11 to the west and the adjoining field to the north by established hedgerows and tree belts. A small block of woodland and a car park associated with the Cambridge University Assessments site lie to the south. The Western Area adjoins the Brownfield Area to the east.

2.1.5 The central and eastern part of the Site comprise the 'Brownfield Area'. It extends to approximately 4.29 hectares. It adjoins the Northern Field and Western Area to the north and west respectively. The Cambridge University Assessments site lies to the south, while Hill Farm Road runs along its eastern boundary.

2.1.6 In the northwestern part of the Brownfield Area is a pair of semi-detached former dwellings, known as 2 and 4 Hill Farm Cottages, which are enclosed by hedgerows. The buildings were most recently used as offices, but and are now vacant. The principal vehicular access to the Site and two areas of car parking lie to the south of the cottages. The northern car park include four publicly accessible electric-vehicle charging points, while the southern car park serves the Provenance restaurant, which occupies converted buildings at its southern end.

2.1.7 The northern part of the Brownfield Area contains the footprint of a former office building, formerly occupied by Syngenta and demolished around 2011. Two substation buildings remain, surrounded by areas of grassland and trees. To the south are two single-storey, steel frame storage buildings, measuring approximately 48m by 37m and 22m by 37m respectively, together with associated areas of hardstanding. A group of horticultural greenhouses occupies the southwestern part of the Brownfield Area, while the southeastern part contains areas of grassland and trees. A concrete roadway links the southern part of the Brownfield Area with the main access to the Cambridge University Assessments site.

2.1.8 The Northern Field lies immediately north of the Site and comprises principally open agricultural land, together with a small orchard and associated outbuildings in its

northwestern corner. Established hedgerows define its northern, eastern and western boundaries, separating it from adjoining agricultural land and Hill Farm Road.

2.1.9 Although the Northern Field lies outside the Site for the purposes of these representations, it is within our client's ownership and could provide opportunities for biodiversity net gain, landscape enhancement and other appropriate mitigation associated with the proposed development. It should therefore be considered in this context.

2.2 Planning Designations.

2.2.1 The Site lies within the Cambridge Green Belt, the southern boundary of which is the A505. It is also located outside the development framework of Whittlesford.

2.2.2 There are no designated heritage assets within the Site or immediately adjacent. Across the M11, approximately 400m to the southwest, lies the Duxford Airfield Conservation Area; it includes a number of Grade II and Grade II*Listed Buildings. The Whittlesford Conservation Area, and a number of listed buildings, lie approximately 500m to the northeast. A Scheduled Monument relating to a Roman settlement is located approximately 500m to the west.

2.2.3 The Site is not within a statutory ecological designation. The nearest such designation is Thriplow Peat Holes SSSI, located approximately 1km to the northwest. There are no public rights of way within or immediately adjacent to the Site.

2.2.4 The Site lies within Flood Zone 1, according to the Environment Agency (EA's) flood map for planning and is therefore at a low probability of flooding. The EA's map also identifies small areas of the Brownfield Area as being at medium risk of flooding from surface water. The Western Area is not identified as being at risk of surface-water flooding.

2.2.5 Natural England's predictive Agricultural Land Classification mapping indicates that the Site may comprise Grade 3a agricultural land. The absolute extent and grading of any best and most versatile agricultural land would be confirmed through a detailed site-specific agricultural land classification survey.

2.2.6 The Site is located within a mineral safeguarding area (MSA) for sand and gravel as shown on the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).

2.2.7 The Site is within the Imperial War Museum Duxford Safeguarding Zone.

2.3 Site Proposal

2.3.1 The Site proposal comprises approximately 30,000sqm of employment floorspace, together with ancillary office accommodation, supporting infrastructure, landscaping, biodiversity enhancements and recreational space. The employment floorspace would principally fall within use classes E(g)(ii) Research and Development, E(g)(iii) Industrial Processes, B2 General Industrial, B8 Warehouse and Distribution.

2.3.2 The anticipated employment units would be designed and built to a high standard and would provide flexible accommodation capable of meeting the requirements of a range of occupiers operating within Cambridge's knowledge-intensive and technology-related sectors. This type of development is commonly referred to as 'Mid Tech' accommodation and typically combines office, research and development, production, industrial and ancillary storage space. Such accommodation typically supports businesses moving beyond the research stage into product development, testing, prototyping and production, where conventional office or laboratory premises may not meet their operational requirements.

2.3.3 The proposal would include the retention of the existing electric vehicle charging facility and Provenance restaurant. It would also provide additional landscape planting and biodiversity enhancements. Vehicular access would be taken from the existing access onto Hill Farm Road.

2.3.4 An illustrative masterplan showing how the proposal could be accommodated within the Site is provided at **Appendix 2**.

3 Response to Consultation

3.1.1 This chapter assesses the relevant policies and supporting evidence underpinning the Regulation 19 Local Plan. It considers whether its approach to meeting the identified need for Mid Tech employment accommodation is justified and effective.

3.1.2 While the Plan recognises the importance of supporting Greater Cambridge's knowledge-intensive sectors, our client considers that it has not demonstrated that sufficient land will be available to meet the identified need for Mid Tech accommodation, particularly during the early part of the Plan period.

3.2 Provision of Additional Space for Employment Uses to support Greater Cambridge's Employment Needs

3.2.1 Emerging Policy S/JH seeks to meet the Greater Cambridge's objectively assessed need in between 2024-2045, including provision to support an additional 73,300 jobs and the continued growth of its knowledge intensive sectors.

3.2.2 Part of the evidence baes which supports the Regulation 19 Local Plan is the *Greater Cambridge Warehouse and Industrial Space Needs Study* (prepared by Iceni in March 2025[1]).

3.2.3 The Report concludes that there is a need for additional industrial and warehousing floorspace, and that this should be provided adjacent to the Strategic Road Network (M11, A14 and A428) on the basis that these represent "*optimum locations*" (paragraph 7.21). The Site lies immediately north of Junction 10 of the M11 and is therefore well positioned in relation to the strategic road network.

3.2.4 The Study also identifies a clear need for Mid Tech accommodation capable of supporting Greater Cambridge's knowledge-intensive sectors. As explained in Chapter 2 of these representations, Mid Tech accommodation generally comprises a mix of Class 'B' uses with larger office space. It can therefore meet the operational requirements of businesses progressing from research and development into testing, prototyping and production, supporting Greater Cambridge's knowledge intensive sectors (principally life sciences and IT).

3.2.5 In considering the spatial distribution of this provision, Paragraph 7.22 of the 2025 Study states:

"An additional edge of centre location with closer city proximity and links would be preferable or ensuring enhanced connectivity to current and future proposals".

3.2.6 The Study identifies the new phase at Eddington as capable of contributing towards this requirement for Mid Tech uses. The recent resolution to grant approval at Committee for Eddington Phase 2 includes the provision of flexible employment floorspace within Class

[1] EBGCLPIWSSMar25v1Mar25_0.pdf

E(g) and sui generis (Greater Cambridge reference: 25/037456/OUT)[2] . Although Eddington Phase 2 may contribute towards elements of Mid Tech demand, its description of development does not expressly provide for uses within Classes B2 or B8. This therefore limits its ability to accommodate the full range of production, industrial and storage activities included within the emerging Local Plan's definition of Mid Tech.

3.2.7 Eddington should not therefore be regarded as necessarily meeting the full range of identified Mid Tech requirements. Further provision will likely be needed to ensure that the employment strategy provides an appropriate choice of sites and premises for businesses with differing operational requirements.

3.2.8 Emerging Policy S/CE provides for a new city district at Cambridge East, including approximately 8,000 homes and significant employment floorspace. This is expected to include approximately 20,000 sq m gross internal area of B2 and B8 floorspace for Mid Tech and general industrial uses.

3.2.9 Cambridge East is therefore expected to make an important contribution to longer-term Mid Tech provision. However, paragraph 7.22 of the 2025 Study states:

"Cambridge East could play a role in meeting Mid Tech but is coming later in the Plan Period which would not meet shorter term demand."

3.2.10 The Council's own evidence therefore indicates that Cambridge East is not expected to meet shorter-term demand for Mid Tech accommodation. The Regulation 19 Local Plan also anticipates longer-term Mid Tech provision through the expansion of Cambourne. Although this provision would contribute towards needs arising later in the Plan period, it would not address the shorter-term requirement identified in the 2025 Study.

3.2.11 Accordingly, the identified provision at Eddington, Cambridge East and Cambourne will likely not provide the full range of Mid Tech accommodation required throughout the Plan period. In this context, the Plan has clearly not demonstrated how the identified shorter-term demand will be met before the later provision at Cambridge East and Cambourne becomes available.

3.2.12 Our client instructed BTG Eddisons to prepare a Needs Assessment, shown at **Appendix 3**. The Assessment considers the need for new Mid Tech industrial development within South Cambridgeshire.

3.2.13 It confirms that the evidence base supporting the Regulation 19 Local Plan identifies a need for substantial employment accommodation within the Research and Development (R&D) and industrial and Mid Tech sectors, as confirmed in the 2025 Report referenced above.

3.2.14 These sectors are identified as important components of the Greater Cambridge economy in the 2020 Employment Land and Economic Development Evidence Study and subsequent evidence, including the 2025 Study. The Regulation 19 Local Plan similarly

[2] 25.03746.OUT and 25.03753.OUT Committee Report Final.pdf

recognises the national and international importance of the Greater Cambridge economy and identifies Mid Tech as comprising uses within Classes E(g), B2 and B8.

3.2.15 The BTG Eddisons Needs Assessment identifies the following principal considerations to support additional Mid Tech provision:

1. Accommodation choice – Occupiers that have previously taken up life science space and now seeking a wider choice of units to support their technical production stage.
2. Retention of growing companies – Occupiers wish to remain in Greater Cambridge and therefore require immediate space so that they do not relocate outside the region, therefore, continuing Greater Cambridge's economy.
3. Supply chain and innovation – Life science and R&D companies rely on specialist suppliers. Mid Tech units can also provide these specialist supply spaces, ensuring the Greater Cambridge supply chain is maintained.
4. Operational suitability – Many occupiers that had been in R&D space require different commercial space, such as floor loading and power, which cannot easily be delivered with existing commercial space.
5. Sustainable transport and accessibility – Proximity to the public transport network, active travel routes as well as the Strategic Road Network.

3.2.16 The Site is capable of contributing towards the identified requirement for Mid Tech accommodation. It is ideally located in proximity to established centres of research, innovation and technology-related employment, including Cambridge Biomedical Campus (12km to the north), Babraham Research Park (10km to the northeast) and Granta Park (8km to the east).

3.2.17 The Site also benefits from direct access to Junction 10 of the M11 and lies approximately 1.77 kilometres from Whittlesford Parkway railway station. The station provides services to Cambridge, London Liverpool Street and Stansted Airport. These connections provide a basis for access by a range of transport modes, with improvements to walking, cycling and public transport connectivity provided as part of any future development.

3.2.18 The Site is within our client's control and is being actively promoted for Mid Tech employment development. Subject to the necessary planning, technical and infrastructure assessments, it has the potential to contribute towards meeting the identified need during the early part of the Plan period.

3.2.19 The evidence supporting the Regulation 19 Local Plan identifies a shorter-term requirement for Mid Tech accommodation. However, the emerging Local Plan has not demonstrated that its proposed employment strategy will provide the full range of E(g), B2 and B8 accommodation needed to meet that requirement during the early part of the Plan period.

3.2.20 Our client therefore considers that the Regulation 19 Local Plan has not demonstrated that it justified or effective in this respect. The Council should assess additional reasonable alternatives capable of delivering Mid Tech floorspace earlier in the Plan

period, including the Site. Further, the Site should be allocated for Mid Tech employment development in future iterations of the Local Plan through a site-specific policy establishing the appropriate mix of uses, development parameters, infrastructure requirements and mitigation measures.

3.3 Emerging Policy S/GB – The Green Belt

3.3.1 Emerging Policy S/GB seeks to maintain a Green Belt around Cambridge in order to preserve the City's unique character, maintain and enhance the quality of its setting and prevent communities in the environs of Cambridge from merging into each other and with Cambridge. The policy states that proposals for development within the Green Belt will only be approved in accordance with national policy.

3.3.2 The Site lies within the Green Belt. However, our client asserts that the Site falls within the definition of the Grey Belt and constitutes a reasonable alternative for employment development.

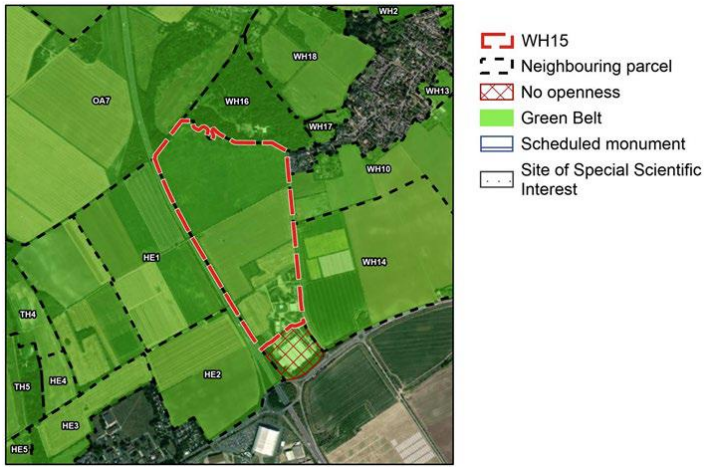
3.3.3 The December 2024 NPPF defines Grey Belt as previously developed land or land that does not strongly contribute towards purposes a), b) or d).

3.3.4 As previously noted, the Site comprises two distinct components. The Brownfield Area comprises previously developed land and therefore meets the definition of the Grey Belt. The Western Area does not comprise previously developed land. However, our client has assessed the lands' contribution to Green Belt purposes (a), (b) and (d) and concludes that it should also considered Grey Belt.

Greater Cambridge Green Belt Assessment (2021)[3]

3.3.5 The Site forms part of a wider Parcel identifies as WH15. It extends to the north of the Site towards the existing woodland and the western boundary of the settlement of Whittlesford. The Plan showing Parcel WH15 is set out below:

Figure 3.1: Parcel WH15: Green Belt Assessment 2021



[3] Greater Cambridge Green Belt Assessment

3.3.6 In terms of its contribution to Purpose a) of the NPPF, the 2021 Assessment concludes that the Parcel as a whole makes a **limited / no contribution** [our emphasis] (i.e. it does not strongly contribute).

3.3.7 Regarding Purpose b), the 2021 Assessment stated that the Parcel made a significant contribution. However, in its updated July 2026 Green Belt Assessment[4], Greater Cambridge acknowledged that this conclusion is not accurate as government guidance subsequently published requires that Purpose b) focuses consideration on gaps between towns rather than smaller settlements. Therefore, our client contends that the Site makes a **limited/no contribution** towards Purpose b) (i.e. it does not strongly contribute).

3.3.8 With respect to Purpose d), the 2026 Green Belt Assessment states that Greater Cambridge only has Green Belt because of the historic character of Cambridge. It adds that assessing Cambridge against a locally specific application of NPPF Purpose d) is more appropriate (paragraph 3.14 of the 2026 Assessment).

3.3.9 The 2026 Assessment reassessed the wider parcel of WH15 against the contribution to Purpose d). The table below shows the summary of the findings for the whole of Parcel 15.

Parcel 5.1: Parcel WH15 – Harm rating and Grey Belt Status (Green Belt Assessment, 2026)

Parcel Ref	Release Scenario	Area (ha)	Harm	Purpose D Contribution	Provision Grey Belt?
WH15	Release of land as an expansion of Whittlesford	48.19	Very High	Strong	No

3.3.10 It is considered that the conclusion of the 'strong' contribution is due to concerns about Whittlesford merging with Duxford, therefore making a considerable contribution to the special character of the historic town.

3.3.11 However, the Site itself is considerably smaller than Parcel WH15. It is only 15% of Parcel WH15. Indeed, the Western Area only constitutes 6% of the total Parcel size.

3.3.12 The Western Area is contained by the M11 to the west, the Brownfield Area to the east and land associated with the Cambridge University Assessments site to the south. Its northern boundary is formed by existing vegetation, which could be reinforced through additional structural landscaping. These features distinguish the Site from the wider Parcel assessed by the Council. In particular, the M11 forms a substantial and permanent boundary to the west, while the Brownfield Area and existing development to the south influence the Site's immediate context. It is in this context that our client considers that the Site makes a **limited / no contribution** [our emphasis] to Purpose d) (i.e. it does not strongly contribute).

[4] Greater Cambridge Green Belt Assessment

3.3.13 Having regard to the Site's contained character, existing development and relationship with permanent physical boundaries, our client considers that there is a strong basis for concluding that the Site meets the definition of Grey Belt.

3.3.14 As the Site clearly falls within the definition of Grey Belt, it is considered appropriate to assess it against the criteria set out in Paragraph 155 of the NPPF, which have been carried forward in Policies GB7 and GB8 of the 2026 NPPF. It is noted that the criteria below are only relevant to the determination of planning applications. However, it is considered appropriate to demonstrate its suitability as a suitable location for immediate Mid Tech delivery.

a) The development would utilise Grey Belt and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the aera of the Plan.

3.3.15 As demonstrated above, the Site clearly falls within the definition of the Grey Belt.

3.3.16 It is also considered that its development would not fundamentally undermine the purpose of the Green Belt (taken together) across Greater Cambridge. Given that the Brownfield Area is previously developed land, only the Western Area has been assessed. The Western Area extends to approximately 2.73ha and represents just 0.01% of the Green Belt in the context of the overall Green Belt for Cambridge (26,090ha)[5]. The Illustrative Masterplan included at **Appendix 2** provides opportunities to mitigate the impact still further.

3.3.17 The development of the Western Area would therefore **not fundamentally undermine** [our emphasis] the purposes (taken together) of the remaining Green Belt across Greater Cambridge.

b) There is a demonstrable unmet need for the type of development proposed

3.3.18 As demonstrated earlier in these representations, there is a clear and current demonstrable unmet need for Mid Tech, and that the development of the Site can be delivered early in the Plan Period. This is supported by evidence carried out by BTG Eddisons (**Appendix 3**). It is therefore contended that these representations sufficiently demonstrate the overwhelming need to allocate this Site for Mid Tech development in future iterations of the Local Plan.

c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

3.3.19 The Site is ideally located in proximity to sustainable transport modes. The Site is adjacent to a bus stop at Hill Farm, which provides services to Cambridge and Whittlesford. Our client would further be willing to liaise with relevant stakeholders to increase these services if considered necessary.

[5] https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2024-to-2025/local-authority-green-belt-england-2024-25-statistical-release

3.3.20 The Site is also located approximately 1.77km to the west of Whittlesford Parkway Train Station. Our client is also willing to work with stakeholders to improve the accessibility of the route to the Station via sustainable modes if considered necessary.

3.3.21 The Site is also located approximately 1.2km to the southwest of the National Cycle Route 11, which starts at Stansted Mountfitchet and ends at King's Lynn. It traverses through other cities, including Cambridge and Ely.

3.3.22 In this context, the Site offers a genuine choice of transport modes, in accordance with the requirements of Paragraph 110 of the 2024 NPPF.

Conclusion

3.3.23 The Council's Green Belt evidence assesses parcel WH15 as a whole and records a strong contribution to purpose (d). However, the assessment does not consider the Site on its own basis, given that it is materially smaller than parcel WH15, together with the difference in its constituent parts being part developed and part agricultural land, together with its relationship with the M11 and surrounding development.

3.3.24 Our client considers that the Site should be subject to a separate, site-specific assessment as part of the consideration of reasonable alternatives. That assessment should determine the extent to which the Site meets the Grey Belt definition and the level of harm that would arise from its release.

3.3.25 When considered alongside the identified requirement for Mid Tech accommodation, the Site falls within the definition of the Grey Belt, together with its availability and relationship with the strategic road network, there is a strong basis for allocating the Site as an employment allocation in future iterations of the Local Plan. Its allocation would contribute towards meeting Greater Cambridge's employment needs during the early part of the Plan period.

4 Conclusion

4.1 Summary

4.1.1 For the reasons set out in these representations, our client considers that the Regulation 19 Local Plan has not yet been demonstrated to be justified or effective in respect of its approach to meeting the identified need for Mid Tech employment accommodation, particularly during the early part of the Plan period.

4.1.2 The emerging Local Plan anticipates that Mid Tech accommodation will be provided principally at Eddington and Cambridge East, with further provision at an expanded Cambourne later in the Plan period. Although Eddington Phase 2 may contribute towards elements of this demand, its description of development for the current outline planning application does not expressly include uses within Classes B2 or B8. Its ability to accommodate the full range of production, industrial and storage activities associated with Mid Tech uses, therefore appears to be limited.

4.1.3 Cambridge East is also expected to make an important contribution to Mid Tech provision. However, the Council's evidence indicates that it will come forward later in the Plan period and will not meet shorter-term demand. The proposed longer-term provision at Cambourne would similarly not address the requirement arising during the early part of the Plan period.

4.1.4 Our client has instructed BTG Eddisons to prepare its own Needs Assessment. It identifies an existing requirement for appropriately specified Mid Tech accommodation within Greater Cambridge. This is consistent with the evidence supporting the emerging Local Plan, which recognises the importance of providing suitable premises for the area's knowledge-intensive and technology-related sectors.

4.1.5 Our client's Site is being actively promoted for up to 30,000 sq m of Mid Tech employment floorspace. It is located immediately north of Junction 10 of the M11 and in proximity to Whittlesford Parkway railway station and established centres of research, innovation and technology-related employment. The Site clearly has the potential to contribute towards meeting the identified requirement during the early part of the Plan period.

4.1.6 The Site forms part of the substantially larger Green Belt parcel WH15 in the Council's evidence base. The Council's assessment of that parcel records a strong contribution to Green Belt purpose (d). However, it does not assess the Site separately or distinguish between the existing developed land within the Brownfield Area and the agricultural land within the Western Area. Our client considers that the Site clearly falls within the definition of the Grey Belt and meets the relevant 'tests' if a planning application was advanced.

4.1.7 In this context, our client requests that the Local Plan is modified to allocate the Site for approximately 30,000 sq m of employment for Mid Tech uses, supported by an appropriate site-specific policy and corresponding amendment to the Policies Map.

4.1.8 Our client wishes to participate in the relevant hearing sessions at the Examination in Public in order to explain and develop the matters raised in these representations.

Appendix 1 Location Plan (reference: 7129-LAN-XX-XX-DR-A-0001-P01)



NOTES

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SITE BOUNDARY - 7.02Ha

OWNERSHIP BOUNDARY

PURPOSE OF ISSUE	RIBA STAGE
PL - PLANNING SUBMISSION	0-2

DRAWING STATUS
S2 - SUITABLE FOR INFORMATION

PROJECT TITLE
Hill Farm Whittlesford

CLIENT
James Harvey

DRAWING TITLE	SCALE
Location Plan	@A3

DATE	DRAWN BY	CHECKED BY	APPROVED BY
01.09.2026	TO	AVW	

DRAWING NUMBER

PROJECT NO | DRAWING FIELDS | REVISION

7127-LAN-XX-XX-DR-A-0001-**P01**

Lanpro
Architecture | Masterplanning & Urban Design | Landscape Architecture
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Tel: 01223 776 740
lanpro.co.uk

Appendix 2 Illustrative Masterplan (reference: 7127-LAN-XX-XX-DR-A-0100-P01)



KEY:

1 - Commercial/ Industrial Buildings

2 - Restaurant/ Retail

3 - Padel Court

4 - Soft Play/ Children Play

5 - Car Parking

6 - EV Parking

Potential for Multi-Storey Car Park

Opportunity for BNG

Site Boundary

Phase 1

Phase 2

Total GIA 23,000 sqm (247,570 sqft)

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Appendix 3 Need for new Mid Tech Industrial Development in South Cambridge (BTG Eddisons, August 2026)

Need for New Mid-Tech Industrial Development in South Cambridge

Pre-Application Planning Statement

4th August 2026

Executive Summary

This report supports a pre-application submission for new industrial and mid-tech employment units in South Cambridge. The Greater Cambridge evidence base identifies substantial employment, R&D and industrial growth requirements and a need for additional flexible industrial and mid-tech accommodation.

South Cambridge is particularly well placed to meet this requirement because it sits close to the Cambridge Biomedical Campus, Babraham Research Campus, Granta Park, Unity Campus, the A11/M11/A505 corridors and Cambridge's skilled labour pool. For occupiers in research and development, engineering, prototyping, diagnostics, devices, clean-tech, deep-tech and specialist manufacturing, this combination of proximity, connectivity and specification is often more important than lowest-cost industrial and warehouse stock.

The evidence points to a requirement for buildings that are more flexible than standard industrial accommodation: good eaves heights, loading doors, power capacity, service yards and parking, combined with higher-quality office/lab-enabled content, amenity, sustainability standards and an environment attractive to science and technology occupiers. This is the "mid-tech" sector: part industrial, part technical workspace, and highly relevant to the Cambridge growth economy.

The proposed development would therefore respond positively to identified employment land needs, support the growth sectors prioritised within the Greater Cambridge evidence base, and provide suitable accommodation that enables local companies to remain and grow within the Cambridge ecosystem rather than displacing to less suitable or less connected locations.

BTG Eddisons

BTG Eddisons has provided commercial property agency services in the Cambridge and mid-Anglia region for around 35 years. This was previously under the firm Barker Storey Matthews, which BTG Eddisons acquired in 2019. BTG Eddisons has been awarded the "Most Active Agent in Cambridgeshire" and the "Most Active Agent in the East of England" for the tenth year running, based on the number of transactions completed. The high number of transactions gives us extensive and detailed knowledge of the markets in which we operate.

Ben Green is a director and head of agency at BTG Eddisons' Cambridge office, with 23 years' experience as a commercial property agent in the regional market.

Purpose of the Report

This note is intended to form part of a pre-application submission. It sets out why new industrial units in South Cambridge are needed, with particular emphasis on demand from research and development, technology, life sciences and knowledge-intensive companies. The analysis focuses on the qualitative and locational need for modern mid-tech industrial accommodation to support research, technology, advanced manufacturing and innovation-led businesses.

The Cambridge Growth Economy

Cambridge is internationally recognised as a centre for life sciences, biotechnology, digital technology, research and development, engineering and advanced manufacturing.

Policy and evidence context

The Greater Cambridge employment evidence base recognises the importance of the Cambridge economy, its employment clusters and the need to plan positively for employment land. The 2020 Employment Land and Economic Development Evidence Study assessed Greater Cambridge's property market, economic clusters, employment land supply and floorspace requirements to 2041. Subsequent evidence for the emerging Local Plan updates the needs period to 2045 and specifically identifies life science, ICT, industrial and warehousing growth-sector evidence as part of the plan-making evidence base.

The emerging planning context is therefore not simply about providing generic employment land. It is about ensuring that the right type of space is available in locations that sustain Cambridge's role as a global innovation economy. Mid-tech industrial units in South Cambridge would contribute to that objective by providing flexible employment accommodation that supports the practical operational needs of R&D and technology companies.

Cambridge's growth economy and the role of South Cambridge

Cambridge's innovation economy is anchored by the University, the Biomedical Campus, Addenbrooke's, Babraham, Granta Park, Cambridge Science Park, Unity Campus and a wider network of specialist firms and investors. The cluster has particular strengths in life sciences, biotech, medical devices, ICT, AI, engineering, electronic systems, agri-tech and deep-tech.

The growth of these sectors creates accommodation requirements that are not always satisfied by conventional warehouses, offices or laboratories. As companies move from discovery and research into development, testing, pilot production and commercialisation, they often require more operationally robust premises: loading access, goods movement, power, plant, servicing, secure yards and flexibility to combine workshop, light production, R&D and office functions.

South Cambridge is well positioned for this type of requirement. It is close to the southern arc of science and life science activity, benefits from access to the M11, A11 and A505 corridor, the rail network, and provides a location that can serve both Cambridge-based occupiers and companies operating across the wider Golden Triangle.

Need for Mid-Tech Accommodation

Mid-tech space combines industrial, R&D, storage and office functions. Evidence identifies growing demand from scale-up and innovation-led businesses requiring prototype, testing and pilot manufacturing facilities.

Bidwells' March 2026 Cambridge Industrial Databook reports renewed demand from knowledge industries: take-up of industrial space in Cambridge during 2025 was 246,000 sq ft, with 142,000 sq ft under offer at the end of the year, occupier requirements totalling 1.688

million sq ft, availability of 5.6%, prime standard industrial rents at £21.00 psf and prime mid-tech rents at £27.50 psf.

DTRE's Golden Triangle science and technology market intelligence reported 22,600 sq ft of laboratory and mid-tech take-up in Cambridge in Q1 2025, 63,000 sq ft under offer and 639,000 sq ft of total demand, of which 317,000 sq ft was classed as active. This supports the view that even in a cautious market, Cambridge retains live demand for practical technical space.

We are aware of several companies currently seeking mid-tech accommodation in South Cambridgeshire, including:

- Blighter Surveillance Systems
- Excelitas
- ESM Global
- Server Choice
- Klura Labs
- Enetic
- IMV Europe & 1G Dynamics

Why South Cambridge

There are numerous reasons why new mid-tech units are needed in South Cambridge.

Accommodation choice: existing science and business parks provide important space, but occupiers at the scale-up and technical production stage require a wider choice of units that can combine industrial functionality with R&D quality. A lack of this choice risks constraining growth or forcing firms into compromised premises.

Retention of growing companies: Cambridge's economic value is greatest when companies can remain within the ecosystem as they move from research through development and production. New mid-tech units would reduce the risk of displacement to locations outside the cluster. Occupiers would also benefit from proximity to Cambridge Biomedical Campus, Babraham Research Campus, and Granta Park.

Supply-chain and innovation benefits: R&D and technology companies increasingly rely on nearby specialist suppliers, equipment firms, contract manufacturers and technical service providers. Industrial accommodation close to Cambridge supports these supply-chain links.

Operational suitability: many innovation-led occupiers require loading, power, resilience, floor loading and servicing that cannot be delivered easily in converted offices or constrained urban buildings. Purpose-built units can meet these requirements more efficiently.

Sustainable transport and accessibility: connected to the public transport network and to active travel routes, including dedicated cycle routes and proximity to Whittlesford Parkway and Cambridge South Train Stations. Good highway access with links to the M11 and A11/A505 corridors.

Conclusions

There is a demonstrable and evidenced need for new industrial and mid-tech accommodation in South Cambridge. The need is driven by Cambridge's expanding R&D, technology and knowledge-intensive sectors, the operational requirements of companies progressing from research to development and commercialisation, and market evidence showing active demand for high-quality industrial and mid-tech space.

Providing new, flexible units close to Cambridge and its research campuses would make a positive contribution to the local economy. It would help retain growing companies, support innovation-led employment and strengthen supply-chain provision and provide the type of practical technical accommodation that the Cambridge market increasingly requires.

We trust you find the above helpful however if we can be of further assistance, please do not hesitate to contact us.

Kind regards

[redacted]

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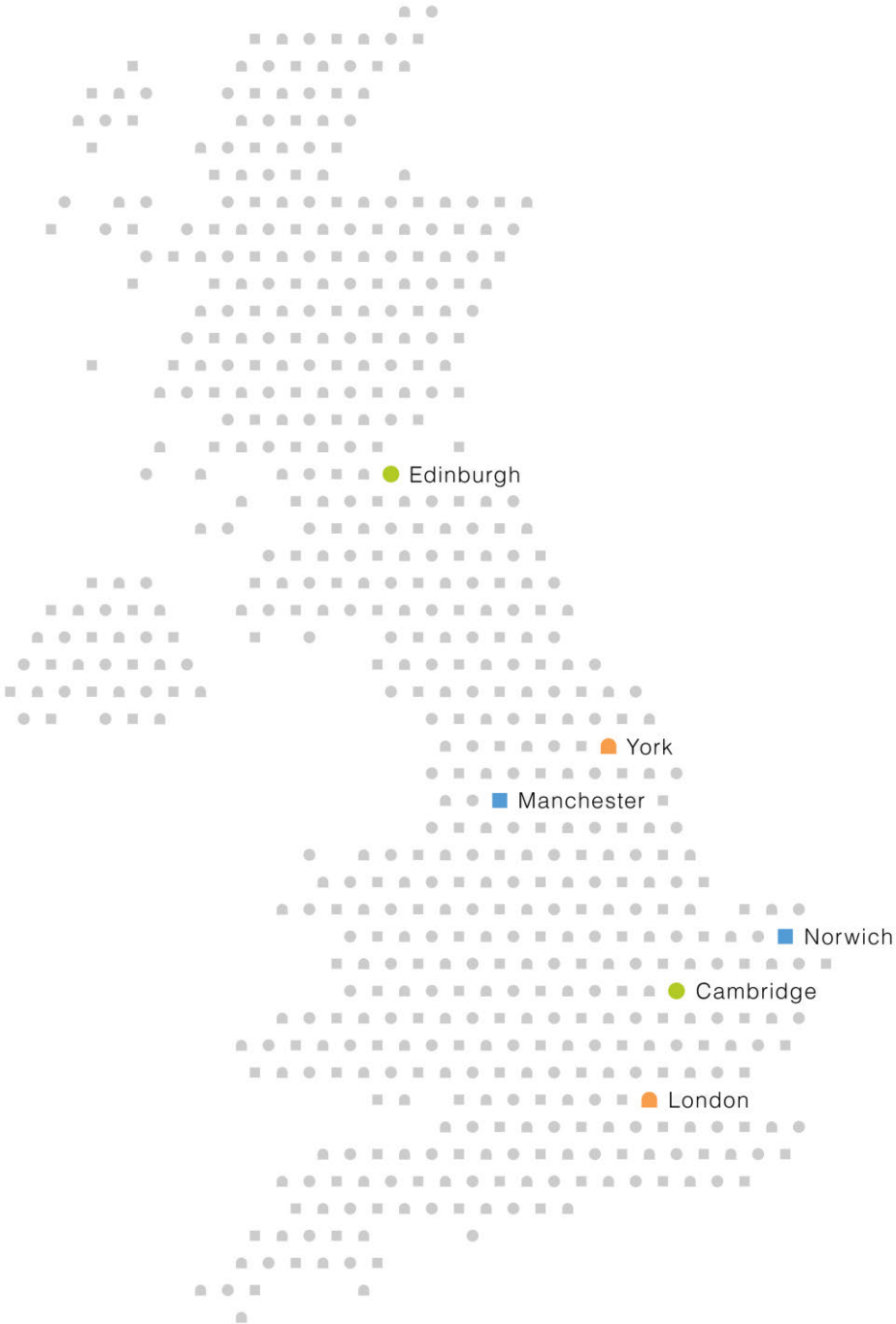
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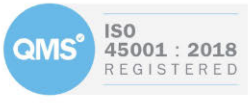

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