Greater Cambridge Local Plan 2024-2045

Regulation 19 Consultation August – September 2026

Land to the West of Scotland Road Farm, Dry Drayton

Call for sites submission on behalf of Dry Drayton Estate

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1. Introduction

1.1. This call for sites representation is being submitted on behalf of our client, Dry Drayton Estate, in response to the Regulation 19 consultation on the Proposed Submission Greater Cambridge Local Plan 2024–2045 ('the GCLP'). They relate to 'Land to the West of Scotland Road Farm, Dry Drayton' ('the site'), which is being promoted for approximately 100,000 square metres of employment floorspace for B2 and B8 uses. The site forms part of a wider landholding, parts of which have previously been submitted as sites for a new settlement through earlier stages of the Local Plan[1]. The other call for sites submission include land east and west of Scotland Road, with the land to the east falling within the Cambridge Green Belt. Whilst this latest submission proposes solely employment uses on a smaller site than the previous submissions, the site would still have the potential to come forward as part of a larger allocation for a mixed-use development. Either through this Local Plan process or future local plans.

1.2. Notwithstanding this, the planning arguments put forward in this submission, which is supported by the report prepared by Lambert Smith Hampton[2] ('the LSH report'), highlight the benefits of the site coming forward for development early on in the plan period. Especially, as it is not reliant on any infrastructure or land uses proposed through the earlier Call for Sites submissions. Whilst the Councils must consider the site as having the potential to come forward as a stand-alone development or part of a larger, mixed-use allocation, neither option would prejudice the other.

Figure 1: Site location plan



[1] HELAA site ID 40317, XXXX and XXXX
[2] Industrial and Logistics Market and Evidence Review – September 2026

1.3. These representations demonstrate that the allocation of the site would be a logical and deliverable means by which the Councils could meet part of the area's employment needs in a sustainable location. One that would result in a better distribution of B2 and B8 uses across the Greater Cambridge area where staff would have options to travel to work by sustainable modes. This is due to the site's relationship to the A428 corridor, which includes existing and committed settlements and committed public transport infrastructure. Accordingly, the site has the ability to contribute to the supply of industrial and logistics floorspace early on in the plan period adding greater certainty to the supply of employment land.

1.4. Whilst the GCLP is being prepared under the legacy plan making system, with soundness in relation to consistency with national policy being considered against the previous NPPF[3] ('the 2024 NPPF'), the decision-making policies of the latest revision of the NPPF[4] ('the 2026 NPPF') will nonetheless be material considerations in the determination of any applications for sites that are not allocated. This is especially relevant for sites that are physically well-related to existing settlements but outside their development boundaries. These are likely to come forward as speculative applications where there is an evidenced unmet need in accordance with decision-making Policy S5. Especially, where sites would deliver sustainable development by being in locations supported by existing and planned infrastructure.

1.5. Policies E2 and E3 would carry great weight in the determination of any speculative planning application for the site. These policies support economic growth and recognise the need to provide suitable employment land near to where people live.

1.6. Policy E3 and part 1(a) of Policy E2 specifically supports improvements in freight and logistics. Part 1(a) of Policy E3 recognises the importance of accommodating freight and logistics developments where they have good access to transport networks (including via sustainable transport modes where possible) and that they be sited and designed to limit environmental impacts (Part 1(b)).

1.7. Part 2 of Policy E2 provides a route by which applications can accord with Policy S5, where market signals indicate an undersupply of specific types of business land or premises (a) and the specific locational requirements of the proposal are met by existing allocations in the development plan (b). In this case the LSH report provides evidence that both arguments could be used to put forward a speculative application for the site.

1.8. The decision-making policies of the 2026 NPPF show the direction of travel of the Government and the weight it attaches to meeting the needs of different types of development in sustainable locations. This approach is not radically different to the paragraphs of the 2024 NPPF that the GCLP will be examined against. In particular, the requirement of paragraph 111 of the 2024 NPPF to minimise the number and length of journeys needed for employment.

1.9. Furthermore, paragraph 20 of the NPPF 2024 requires strategic policies to make sufficient provision for employment development. Whilst addressing the specific locational requirements of different sectors of the economy are necessary to comply with paragraphs

[3] National Planning Policy Framework – December 2024
[4] National Planning Policy Framework – August 2026

61 and 87. Importantly, the provision of employment uses allocated through the GCLP must be sufficiently flexible to accommodate changing economic needs to accord with paragraph 85 and proactively supports sustainable growth to accord with paragraph 86. How well the proposed B2 and B8 use allocations of the GCLP perform against these requirements are considered in this submission.

1.10. There is a strong argument for the allocation of the site regardless of the weight attached to the decision-making policies of the 2026 NPPF. This due to the following benefits that the development of the site would deliver:

- Provide approximately 100,000 sqm of B2 and B8 floorspace to help meet existing and future employment needs within the Greater Cambridge area creating a greater diversity of employment opportunities;
- Add greater flexibility and certainty to the employment land supply by enabling early delivery of B2 and B8 floorspace within the plan period;
- Meet some of the distribution and logistic needs of Cambridge and the surrounding settlements as well as contributing to regional and national distribution networks;
- Utilise an existing access onto the strategic highway network without any further off-site works needed to accommodate the new development;
- Locate employment growth on the A428 corridor, diversifying provision beyond the existing and proposed B2 and B8 sites on the A14 corridor and improving the resilience of the employment land strategy. This corridor also forms part of the wider Cambridge to Oxford Arc that has been identified as a major area of growth between the two university cities;
- Create jobs close to existing, committed and proposed residential developments at Hardwick, Highfields Caldecote, Bourn Airfield, Cambourne, Cambourne West and Cambourne North;
- Utilise existing and committed transport infrastructure in close proximity to the site, including the Cambourne to Cambridge busway, Scotland Farm Travel Hub and the proposed East West Rail station at Cambourne North.
- Make efficient use of a site that has a high degree of visual containment provided by the buildings of Scotland Road Farm and the landscaped bund alongside the A428.
- Provide a readily deliverable standalone allocation which is not dependent on Cambourne North, East West Rail or the delivery of a wider residential-led masterplan.

1.11. These matters are discussed in more detail in the following sections.

- Section 2 considers the site's sustainable location, including its relationship with nearby settlements, planned residential growth and sustainable travel infrastructure.

- Section 3 addresses landscape matters, including the existing screening provided by Scotland Road Farm and the landscaped bund to the south, as well as the scope for additional landscape buffers.
- Section 4 reviews the Proposed Growth Strategy with regards to B2 and B8 provision across proposed allocations, discussing the need for a broader distribution of employment provision beyond the A14 corridor.
- Section 5 provides a summary of the representations.
- Section 6 addresses deliverability.
- Section 7 sets out the specific policy changes that are proposed.

2. Sustainable Location

2.1. The site benefits from an existing access off the Scotland Road roundabout to the north of the A428 flyover. This access has been designed to accommodate the large agricultural vehicles that regularly access Scotland Road Farm. Within the site there are B8 use buildings that are also accessed off the roundabout. Similarly, the roundabouts to the north and south of the flyover accommodate traffic from the farm and would not need any modifications to accommodate the additional traffic associated with the proposed B2 and additional B8 uses. The A428 junction has slip roads that allow traffic to access and egress in both east and west directions. This is the nearest junction of the A428 to Cambridge with this degree of east west connectivity. This allows vehicles to access the strategic road network without having to travel through nearby villages.

2.2. Within the site there is an internal access road that would be used to access the site. This would avoid any conflicts between agricultural and commercial traffic. Minor modifications would be proposed to ensure that the internal access road included segregated routes for pedestrians and cyclists as part of the measures to encourage staff to use sustainable modes of travel.

2.3. The A428 provides direct east-west connectivity between Cambridge and the wider sub-region by way of a dual carriageway. To the west, the A428 connects the site with Bedford and the A1. Whilst this route presently includes sections of single carriageway, the section between Caxton Gibbet and the Black Cat Roundabout is being upgraded to a dual carriageway by Highways England. To the east the A428 joins with the A14 as well as providing connectivity with Cambridge and the M11 (approx. 5.3km). The location makes the site well-placed for B2 and B8 uses, which require good connectivity with the wider strategic highway network. The allocation of the site would also support a broader distribution of B2 and B8 uses beyond the allocation on the A14 corridor proposed by the GCLP.

2.4. The scale of growth planned to the west of Cambridge (along the A428 corridor and on the fringes of the city) there is likely to be local logistic needs to serve these growing populations. The site would also be well placed to serve these developments as well as serving new settlements at Northstowe and Waterbeach via the A14.

2.5. The site is accessible by walking and cycling from the existing and planned settlements along the A428 corridor. In particular, it is located within walking distance of sites on St

Neots Road, Hardwick, Highfields Road, Caldecote and Bourn Airfield. Further afield, Cambourne and Cambourne West are within cycling distance of the site. The GCLP proposes and allocation for the extension of Cambourne to the north of the A428.

2.6. The relationship between the site and these nearby developments is important. The delivery of B2 and B8 employment floorspace in this location would place jobs close to existing and planned homes, helping to support shorter trips to work that would provide greater opportunities for employees to travel by sustainable modes rather than relying on cars. This is in contrast to the proposed B2 and B8 allocations along the A14 corridor that are more remote from the nearest settlements and would offer less opportunities for employees to use sustainable modes of travel. Walking to these sites from nearby settlements would not be realistic given the distances and lack of lit pedestrian routes. Similarly, cycling would not be appealing given the environment alongside the A14. As there are no bus routes that have stops near to the A14 sites, employees using public transport would not be an option.

2.7. In contrast, the A428 corridor will be served by the now committed Cambourne to Cambridge busway. This will provide a largely off-road, rapid bus route between Cambourne and Cambridge via Bourn Airfield, Hardwick, Coton and the West Cambridge site. Alongside the bus route there will be a segregated route that is dedicated for non-motorised users. The scheme will include stops at Cambourne, Bourn Airfield, Scotland Farm Travel Hub, Hardwick, Coton and Cambridge West. This route will provide frequent and reliable public transport services together with improved active travel infrastructure.

2.8. The Scotland Farm Travel Hub is of particular relevance to the site as it will include a new Park and Ride to the east of Scotland Road. To provide enhanced cycle and pedestrian connectivity to the new Park and Ride there will be changes to the roundabouts either side of the A428 flyover. These changes will have the added benefit of providing enhanced routes for pedestrians and cyclists to access the site.

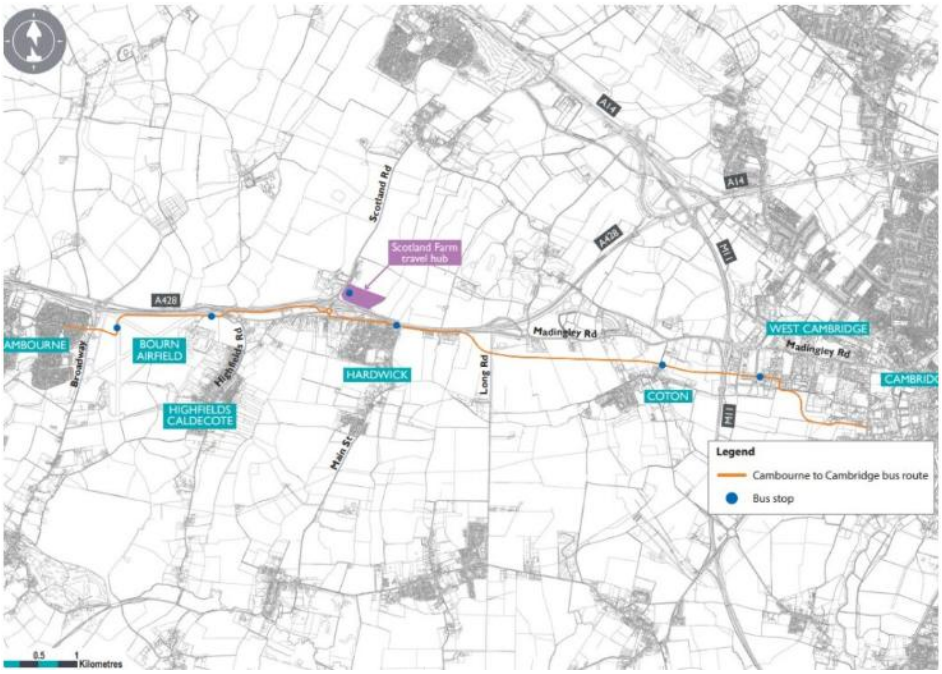
2.9. The sustainability of the site will be further enhanced by the East West Rail proposals that include a new station to serve Cambourne. This station would support the proposed allocation of Cambourne North. East West Rail has identified that the new station would provide faster and more reliable rail connections, including a potential journey time of around 16 minutes between Cambourne and Cambridge, and would connect Cambourne eastwards to Cambridge and westwards towards Bedford, Milton Keynes and Oxford.

2.10. The emerging Cambourne North station is therefore a key element of the sustainable transport context for the A428 corridor. Greater Cambridge's own Rail Integration Study (November 2025) identifies East West Rail as a potential catalyst for growth at Cambourne and emphasises the importance of connecting the new transport infrastructure with existing settlements west of Cambridge. The site would sit within this wider transport and growth corridor, where improved rail, bus and active travel connections are expected to strengthen accessibility over the plan period.

2.11. At Scotland Road Farm and within the converted agricultural buildings to the east of the road (Dry Drayton Industries) there are employment units comprising offices and retail uses. The companies in these units would benefit from the enhanced logistics provided by the proposed allocation and could also benefits from the warehousing use. Dry Drayton Industries also accommodates food outlets and recreational facilities. These are all within a

short walk from the site and would be complementary to the proposed allocation by offering recreational facilities for employees of the B2 and B8 units.

Figure 2: Scotland Farm Travel Hub



2.12. Taken together, the site's relationship with the A428, nearby existing and planned residential development, Cambourne North station, the Cambourne to Cambridge busway and the Scotland Farm Travel Hub demonstrates that it is a sustainable location for employment development. The site would be capable of supporting employees' travel to work by public transport and active travel, while also providing the strategic road connectivity required for B2 and B8 uses.

2.13. Whilst there are sustainability benefits from the proposed public transport enhancements to the A428 corridor, they will nonetheless have a visual impact upon the landscape of the surrounding area. This impact will inevitably lower the landscape sensitivity of the site.

3. Landscape Matters

3.1. The landscape context of the site is key when considering the impacts of a type of employment that is characterised by large buildings. It is recognised that the Councils have expressed concerns about the wider landscape impacts of the larger sites promoted through early stages of the Local Plan. Which include land to the east of Scotland Road that forms part of the Cambridge Green Belt. Whilst these impacts could be mitigated through new landscaping, the development of the smaller site in isolation would not need the same level of mitigation. Especially as it would not include any Green Belt land. Any development within the site would have less of a visual impact upon the surrounding landscape, due to the site being less prominent in wider and localised views. As such, it's development would not have a significant impact upon the character of the area. Especially when seen in the context of the urbanising forms of the A428 to the south, Scotland Road Farm to the east and the committed public transport infrastructure in the area.

3.2. The site benefits from a high degree of visual containment, which could be further enhanced through the detailed landscaping proposals. The site is already well screened from distant and near views from the east by existing buildings at Scotland Road Farm. To the south, the landscaped bund screens views from the A428 and St Neots Road to the south. As this landscaping matures, the screening benefits it provides will increase. This would reduce the prominence of new buildings on the site in wider landscape views that are largely non-existent from south of the A428.

3.3. The context of the site provides a strong basis from which to propose a comprehensive landscape mitigation strategy for the western and northern boundaries. Additional structural planting would create landscape buffers. This new landscaping could be secured through the allocation and subsequent planning application to protect sensitive views and provide an appropriate transition between the employment use and surrounding countryside. This additional landscaping would deliver significant gains in biodiversity through new habitats and wildlife corridors. Other ecological enhancements could also be accommodated within the site to deliver further benefits for wildlife.

3.4. The context of the site differs to the contexts of the proposed allocations alongside the A14. Buildings alongside the A14 would be in a flatter landscape with less opportunities for screening by bunds or landscaping. This is evident from the buildings on Buckingway Business Park that are stark, urbanising features to the north of the A14. The proposed allocations would further compound the urbanising impact of the A14 corridor on the surrounding landscape. In contrast, the allocation of the Dry Drayton site would not represent an incursion into an otherwise unchanged rural landscape. Rather, it would be located within an area characterised by existing agricultural and commercial buildings, established landscape features and strategic transport infrastructure. With an appropriate design of the buildings within the site, and landscaping of its western and northern boundaries the site is capable of accommodating B2 and B8 uses while only having limited impacts upon the receiving landscape. This can be demonstrated at the application stage by a Landscape and Visual Impact Assessment.

4. Proposed Growth Strategy

B2 / B8 Provision

4.1. The GCLP seeks to manage the delivery of large-scale warehousing and distribution facilities through Policy J/NE. Specifically, Part 8, which states that proposals for large scale warehousing and distribution 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. Notwithstanding this, the Councils recognise that there is a need for warehousing, distribution and industrial space required to meet local market needs in market sector priority locations.

4.2. The Development Strategy Topic Paper 2026 identifies a need for B2/B8 floorspace over the plan period. While this is a comparatively limited component of the overall employment land requirement, it remains an important part of the economic strategy and must be planned for in locations capable of meeting demand. Consideration of how this need has been calculated, and whether these calculations are sound, is included in the LSH report. Indeed, the LSH report concludes that the Councils' strategy and evidence base are not sound and that they do not fully acknowledge or positively plan for the benefits that

appropriately located B2 and B8 uses can deliver for the population of Greater Cambridge and the industries that will support its growth.

4.3. In particular, the importance of the A428 corridor in providing an optimum location for deliveries serving Cambridge's population and business supply chains. The Councils acknowledge and assess the A428 as a location for B2 and B8 employment uses. However, there is no justification as to why it is subsequently discounted and only sites on the A14 are allocated for these uses.

4.4. The strategy in the GCLP directs B2/B8 provision predominantly towards the A14 corridor by way of the following proposed allocations:

- Policy S/RRA/SHF - Land North of the A1307 at Bar Hill (Slate Hall Farm) (approx. 220,000 sqm); and
- Policy S/RRA/SCS - Land to the south of Cambridge Services, A14 (approx. 90,000sqm); and
- Policy S/RRA/BBP – Land at Buckingway Business Park, Swavesey (approx. 10,000sqm).

4.5. Although locations on the A14 inevitably have a role to play, it is not appropriate for the Local Plan to concentrate the majority of the area's logistics and distribution provision on only one part of strategic road network. Indeed, the A14 is already heavily congested and vulnerable to disruption from accidents that are an almost daily occurrence. A strategy which places a significant proportion of the area's B2/B8 floorspace on this route would therefore create an unnecessary resilience risk, with delays or closures on the A14 having the potential to affect a substantial part of the logistics network serving Cambridge. This strategy is therefore not sound. And as the LSH report concludes, this strategy risks constraining the infrastructure needed to support Greater Cambridge's growth sectors, retain expanding businesses and maintain resilient supply chains.

4.6. There are also sustainability concerns with relying on these locations for future employment growth as discussed previously. In practical terms, access to these sites would be likely to depend heavily on the private car, particularly for employees travelling from the growing communities at Hardwick, Caldecote, Bourn Airfield, Cambourne, Cambourne West and Cambourne North. This would also further increase the existing congestion issues on the A14 and the local roads used to access it. Which includes Scotland Road.

4.7. A report prepared by Iceni[5] to support the GCLP identified the trend for B2 and B8 businesses to move out of Greater Cambridge due to a lack of suitable space. This trend is also highlighted by the LSH report. Allocating more land nearer to Cambridge would help to retain these businesses, contributing to economic growth not just in B2 and B8 uses, but also the employment uses more typical to the Greater Cambridge area that would benefit from enhanced logistics and warehousing that is more accessible.

[5] Warehouse and Industrial Space Needs in Greater Cambridge – March 2025

4.8. Allocating Land West of Scotland Road Farm would provide an opportunity to diversify the employment land by introducing a deliverable B2/B8 site on the A428 corridor. This would complement, rather than undermine, the proposed A14 corridor allocations by spreading employment provision across more than one strategic transport corridor and improving the relationship between employment land and planned residential growth to the west of Cambridge and along the A428 corridor.

Cambourne North Allocation

4.9. The GCLP identifies Cambourne North as a major strategic allocation to the west of Cambridge[6], providing for approximately 13,000 homes and 108,000 sqm of employment floorspace. Within the new town a wide range of employment opportunities are proposed, with a particular focus on jobs that are complementary to those in the wider region, such as mid-tech industries. This demonstrates that the Council recognises the strategic importance of this part of Greater Cambridge and the role that the A428 corridor can play in accommodating significant growth over the plan period. It also demonstrates the weight attached to delivering employment sites near to new homes. However, like elsewhere in the Greater Cambridge area, there could be a lack of diversity of employment opportunities.

4.10. A reliance on Cambourne North alone to deliver employment floorspace in this area would be insufficiently flexible and carries significant delivery risk. The rationale for the Cambourne North allocation is closely linked to the delivery of a new East West Rail station in this location, which is not yet fully committed. If the station does not come forward, or is delayed, the justification for the allocation would be significantly weakened. In that scenario, the associated employment floorspace proposed in this part of Greater Cambridge would also be at risk, leaving the plan dependent on a large and complex allocation which may not deliver the intended employment benefits within the plan period.

4.11. There is precedent in this sense as well. When Cambourne was first planned, the original masterplan envisaged a greater level of local employment provision, including a high street and business park. In practice, those employment elements did not come forward as originally proposed with parts of the Business Park now being developed for residential uses and an application for the high street stalled. This means that far form being a sustainable settlement, Cambourne has developed primarily as a dormitory settlement with high levels of commuting out of the town. This historic experience demonstrates the risk of assuming that employment floorspace within a wider residential-led strategic allocation will necessarily be delivered as anticipated.

4.12. The same risk applies to Cambourne North. The delivery of employment floorspace within what is essentially a new settlement would be dependent on infrastructure provision, market demand, phasing, viability and the timing of residential development. If key infrastructure such as the East West Rail station is delayed or not delivered, there is a real prospect that the employment element of the allocation will either be delayed or fail to come forward in the proposed manner.

4.13. In contrast, the site to the west of Scotland Road Farm provides a separate, readily deliverable employment opportunity on the A428 corridor which is not reliant on the delivery of Cambourne North, the new railway station, or the allocation of the land to the

[6] Policy S/CBN: Cambourne North

north. Its allocation would therefore provide greater certainty and resilience in the employment land supply, ensuring that B2 and B8 floorspace can be delivered in this part of Greater Cambridge early on in the plan period. This is especially important if the Cambourne North allocation is delayed or does not come forward as anticipated.

4.14. The site offers a complementary and more immediately deliverable opportunity for employment on the A428 corridor. One that in part addresses the limited employment provision at existing settlements in the area. The site could come forward as a standalone employment allocation, whilst having the potential to support the employment needs of wider strategic growth if the land to the north were allocated in this or future Local Plans. An allocation of the site would add resilience to the growth strategy and ensure that employment land provision on the A428 corridor is not dependent on a single large and complex allocation. This would then make the GCLP more sound.

5. Summary

5.1. The site at 'Land west of Scotland Road Farm' represents a sustainable, deliverable and well-located opportunity to provide approximately 100,000 sqm of B2 and B8 employment floorspace on the A428 corridor. The site would help meet the identified need for industrial, warehousing and distribution provision in Greater Cambridge, while diversifying employment land supply beyond the A14 corridor and improving the resilience of the proposed growth strategy.

5.2. The site is well related to existing and planned communities at Hardwick, Caldecote, Bourn Airfield, Cambourne, Cambourne West and Cambourne North, and would benefit from existing and emerging transport infrastructure including the A428, the Cambourne to Cambridge busway, Scotland Farm Travel Hub and the proposed East West Rail station at Cambourne North.

5.3. The site that is hereby being promoted as a stand-alone employment parcel differs from the other call for sites submissions previously assessed by the Councils. It benefits from a high degree of visual containment provided by Scotland Road Farm and the landscaped bund to the south. Accordingly, with a sensitively designed scheme, the site is capable of accommodating B2 and B8 uses without unacceptable landscape effects.

5.4. Allocation of the site would complement, rather than undermine, the proposed strategy by providing a deliverable employment opportunity which is not reliant on Cambourne North, East West Rail or a wider residential-led masterplan. It would therefore add flexibility, certainty and resilience to the GCLP's employment land supply as well as delivering one of the fundamental aims of the NPPF, sustainable development.

6. Deliverability

6.1. The site is deliverable, being a single land ownership, and capable of coming forward early in the plan period. The site has access to a high voltage electricity supply. Buildings within the site could accommodate solar panels to feed excess electricity back into the grid. There are no known constraints which would prevent the delivery of B2 and B8 employment development on the site, and it is not dependent on the delivery of a wider strategic allocation, new settlement or major enabling infrastructure before development can commence.

6.2. The site benefits from an established access and is well-related to the existing strategic highway network. This means that, subject to the grant of planning permission and the approval of any necessary technical details, development could commence immediately thereafter.

6.3. There are also no identified abnormal or unexpected costs associated with the site which would undermine its deliverability. This distinguishes the site from larger and more complex strategic growth options which may require significant infrastructure planning, phasing arrangements and long lead-in times before employment floorspace can be delivered. By contrast, the site would provide a readily deliverable opportunity to make an early contribution to Greater Cambridge's supply of B2 and B8 employment floorspace.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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