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PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN REGULATION 19 CONSULTATION - AUGUST 2026
JAYNIC PROPERTIES LTD (JAYNIC) AS LAND PROMOTOR AND DEVELOPER - ON BEHALF OF THE PEARSON FAMILY AND WORKING IN COLLABORATION WITH THE UNIVERSITY OF CAMBRIDGE

INTRODUCTION

The consultation on a Reg.19 Proposed Submission Greater Cambridge Local Plan (draft GCLP) is taking place between 3rd August 2026 and 25th September 2026. This document provides representations to the consultation.

Due to the fact that the representations will be submitted in relation to individual policies, rather than read as a whole, there is inevitably significant repetition contained within them.

The final version of the representations will be uploaded into the online consultation system.

LAND TO THE SOUTH OF CAMBRIDGE SERVICES, A14. REPRESENTATIONS

Policy S/JH: New Jobs and Homes

Support

These representations are submitted on behalf of Jaynic Properties Ltd (Jaynic) in support of land allocated (draft Policy S/RRA/SCS) at Land to the South of Cambridge Services, A14 for employment development (the Site).

Jaynic's development proposals will endeavour to deliver the policy aspirations for the Site, as set out through the Proposed Submission Greater Cambridge Local Plan.

Draft Policy S/JH: New Jobs and Homes is supported. It sets out the Council's strategic aspirations for New Jobs and Homes in Greater Cambridge. The plan seeks the provision of an additional 73,300 jobs to 'support Greater Cambridge's knowledge intensive sectors and also provides a diverse range of local jobs' to meet an objectively assessed need. Over the plan period, draft Policy S/JH identifies need for:

- 302,600 sqm offices and 600,000 sqm of Research and Development (R&D) space
- 317,000 sqm of industrial / warehousing (use classes B2/B8).

These figures are derived from the Greater Cambridge Employment and Housing Evidence update (2025), which is informed by preceding assessments including the Greater Cambridge Employment and Housing Evidence Update 2023 and the Greater Cambridge Employment Land and Economic Development Evidence Study 2020. They draw upon the latest available data to identify the "central" most likely future jobs forecast taking account of what is unique about the Greater Cambridge economy, including life science and ICT sectors – priority sectors identified in the Cambridgeshire and Peterborough Local Growth Plan. This work confirms that there remains strong demand for new industrial (Use class B2 and B8) floorspace in Greater Cambridge. This demand analysis was reconfirmed by the Review of Economic Data, Context and Representations Report (2026).

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The central forecast assumes strong growth of around 3,500 additional jobs per annum or more through to 2045 – continuing the recent period of rapid growth seen in Greater Cambridge's knowledge intensive sectors, but also building in an assumption that there will be slower or contracting periods and unforeseen shocks, which are likely in most economies. We note that the Authorities consider that they should plan for this forecast of the most likely level of new jobs.

The need for these uses is also confirmed in the Greater Cambridge Warehouse and Industrial Space Needs Assessment (March 2025) which forms part of the draft Local Plan's evidence base.

We welcome the fact that the Joint Plan acknowledges that the EHNU 2025 also identified a higher growth forecast, placing greater weight on rapid growth in the recent past, particularly in key sectors, and that it recommended providing flexibility in employment land in case the market delivers more jobs than anticipated.

The accompanying Jobs Topic Paper references the Get Cambridgeshire and Peterborough Growing, the Cambridgeshire and Peterborough Combined Authority Local Growth Plan, approved in October 2025, identifies Greater Cambridge as Global City Cambridge Opportunity Zone.

> *"This Opportunity Zone is focused on turbocharging an already globally recognised industry. It will continue to concentrate priority sectors in Cambridge while unblocking key infrastructure gaps with a focus on our shared priorities with Government. Comprised of nine key projects, and interventions focused on making Cambridge as globally competitive as possible, this Opportunity Zone is of the utmost strategic importance, not only for the area, but for the nation."*

The sector focus in the area will be Life Sciences, Advanced Manufacturing & Materials; Digital Technologies; Defence; Agri-Food & Tech and Energy & Clean-Tech. The key projects within Greater Cambridge area are A10 improvements, Cambourne, Cambridge East, North East Cambridge and Mass Rapid Transit. The interventions are securing global industries into Cambridge; establishing an Ox-Cam Institute for innovation led growth and exploring venture capital.

The Growth Plan states that with National Reach and Global Impact very large numbers of new jobs are anticipated to be delivered at the following two locations within Greater Cambridge:

- There is scope for significant expansion of the Cambridge Biomedical Campus. The 2024 Spatial Framework for the site sets out how this can become 1,600,000sqm by 2050, driving job creation by attracting and growing new life science business, capturing internationally mobile investment, including multinational R&D headquarters and building the world's most research activated healthcare infrastructure. The projected Growth in jobs is an additional 23,000 jobs by 2050.

- Cambridge Business Park: The Crown Estate have unveiled bold proposals to regenerate Cambridge Business Park and create a new innovation ecosystem in Northeast Cambridge. The £1.5bn project will create over 8,000 jobs

The Greater Cambridge City Deal recognised the strong relationship between housing supply and economic performance, noting that constrained housing availability and affordability have influenced house prices, commuting patterns, and employers' ability to attract and retain staff. The Cambridgeshire and Peterborough Devolution Deal similarly committed to substantial economic growth, including a target to double economic output over 25 years.

In 2024, Government established the Cambridge Growth Company to help maximise Cambridge's economic potential and deliver nationally significant growth. The Greater Cambridge Development Corporation was established by the government on 23 July 2026. It is a statutory delivery body set up as a new local-national partnership, to unlock the long-term sustainable economic future of Greater Cambridge.

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Building on the foundations laid by the Cambridge Growth Company, the Development Corporation marks the next phase of the government's commitment to achieving nationally significant economic growth through infrastructure-led development.

Consequently, it is apparent that the evidence base to the emerging draft Local Plan has continually identified strong demand for industrial (Use class B2 and B8) floorspace. The confirmation of this demand in policy in the Proposed Submission Greater Cambridge Local Plan is strongly welcomed.

The identification of need for 317,000 sqm of industrial / warehousing (use classes B2/B8) is supported.

Policy S/DS: Development Strategy

Support

These representations are submitted on behalf of Jaynic Properties Ltd (Jaynic) in support of land allocated (draft Policy S/RRA/SCS) at Land South of Cambridge Services, A14 for employment development.

The Development Strategy as set out at draft Policy S/DS: Development Strategy is supported.

We note that the appropriate number of sites have been allocated to meet the identified need. This is supported.

Draft Policy S/DS: Development Strategy, sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge, for the plan period 2024 to 2045 and beyond. It identifies where the homes and jobs identified in S/JH: New Jobs and Homes should be provided to meet the vision and strategic priorities of the Local Plan.

In summary, the development strategy comprises delivery at the following locations: sites within Cambridge; existing urban extensions on the edge of Cambridge; existing new settlements; proposed new settlements; housing and employment at employment sites in the rural southern cluster; proposed new strategic employment allocations; and, a limited number of sites at villages in the rural area.

The draft policy is informed by the Greater Cambridge Warehouse and Industrial Space Needs Assessment (2025). Relevant to the site, Land South of Cambridge Services, A14 the report confirms:

> ***"Manufacturing:*** *Optimally, new sites for expanding or new businesses would be readily commutable to Cambridge. Bar Hill / Buckingway Business Park offer the current prime locations albeit are primarily car commutable. Some expansion of existing locations could be considered alongside the need for new investment location(s).*
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> ***Distribution:*** *Junctions on the A14, M11 and potentially A428 provide the optimum locations for meeting business to business and business to consumer deliveries supporting the Cambridge population and business supply chains. The current proposal at J24 A14 is unlikely to be sufficient to meet the scale of demand anticipated, so revisiting / expanding this and considering a secondary location is recommended. It may be preferable to have two locations brought forward simultaneously to improve occupier choice and competitiveness. Anticipated demand for this type of space is substantial and could form two 10-15 ha (additional) parcels or one larger site.*
>
> ***Final mile distribution:*** *Delivery operators, mostly third party, are seeking locations close to the A14 (such as Buckingway Business Park or Bar Hill), where there is also an available local workforce, and the A428 is also viewed as increasingly attractive given upgrades and A1 connectivity. For parcel carriers, a 20-30 acre (8-12 ha) site close to Cambridge would be ideal, and one agent noted that they would already have three-four prospective occupiers for*

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this land. These need to be close enough for sustainable trips to the urban population including for electric LGVs with a 50-150 mile range – in that sense the urban fringe (for example M11 J14) is even more optimal than A14 J24/25. There are currently numerous specialist wholesale and distributions firms located at Buckingway Business Park and Bar Hill".

The proposed development strategy makes clear that Greater Cambridge's intention is to plan for a greater amount of employment floorspace than associated with the identified need. Sufficient sites have been identified therefore to meet the needs identified.

As per commentary in the Warehouse and Industrial Needs Assessment (2025) two sites are allocated for industrial development along the A14. Land south of Cambridge Services, A14 and Land at Slate Hall Farm, Bar Hill (draft Policy S/RRA/SHF). No additional sites along this stretch of the A14 are allocated for industrial/commercial development at this time.

The Greater Cambridge Warehouse and Industrial Space Needs Assessment (2025) identifies that some of the general requirements will be met through First Proposals at J24 A14. Junctions on the A14, M11 and potentially A428 provide the optimum locations for meeting business to business and business to consumer deliveries supporting the Cambridge population and supply chain. The current proposal at J24 A14 is unlikely to be sufficient to meet the scale of demand anticipated, so expanding this and / or considering a secondary location is recommended as it may be preferable to have two locations brought forward simultaneously to improve occupier choice and competitiveness. There are clear requirements for Cambridge specific delivery operators in addition to strategic requirements for the sub region looking to take advantage of the road network connectivity. Anticipated demand for this type of space is substantial and could form two 10-15 ha parcels or one larger site in addition to the existing A14 allocation.

The Needs Assessment concludes that two locations along the A14, in the vicinity of Barr Hill, is sufficient to provide occupier choice and competitiveness. The need for the allocation of additional sites in this location has not been identified.

Within this context it is envisaged that this Site will offer a range of new employment opportunities, bringing forward approximately 90,000 sq m of employment floorspace for industrial and warehousing uses (B2 and B8). This will help meet the identified employment need and support the occupational requirements of the local economy; together with providing additional lorry parking to alleviate the critical local shortage. This element of the Development Strategy is supported.

The allocation of land south of Cambridge Services for employment development, plus one other site, along the A14 is strongly supported.

Policy S/RRA/SCS: Land to the South of Cambridge Services, A14.

Comment

These representations are submitted on behalf of Jaynic Properties Limited (Jaynic) in support of land allocated (draft Policy S/RRA/SCS) at Land South of Cambridge Services, A14 for employment development.

Whilst Draft Policy S/RRA/SCS: Land to the South of Cambridge Services, A14 is much supported, we believe that a number of minor amendments are needed to elements of the policy wording in order to ensure that the Draft Plan is sound.

The Development Strategy Topic Paper Appendix 7: Review of Sites for Industrial and Warehousing Space (August 2026) identifies that Land to the south of the A14 Services, Boxworth (HELAA Ref: 45107) is a 25 hectare site to the south of the A14 and adjacent to the A14 Services at junction 24A. An allocation for a majority of the site was included in the First Proposals. A subsequent submission added an additional 6 hectares to the north east of the original which includes 2.25 hectares of lorry parking. A significant portion of the site was used as a site compound for the A14 improvement works.

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The remainder is currently in agricultural use. It has an estimated site capacity of 90,000 square metres.

The Topic Paper goes on in paragraph 1.10 to conclude that having explored the planning merits of the reasonable alternative sites, Land at Junction 25 of A14, Bar Hill is one of the Councils' two preferred locations for the provision of B2/B8 space.

The Topic Paper at paragraph 3.5 highlights that Land to the south of the A14 Services, Boxworth lies adjacent to the Extra A14 Services which would provide services for workers on the Site. The Site would provide around 150 lorry parking spaces adjacent to an existing lorry park and the services provided by Extra Cambridge. Land to the south of the A14 Services, Boxworth would therefore meet more of the identified need for lorry parking in a location that is better related to the existing lorry park and adjacent services.

Acknowledgement within both the Topic Paper and draft GCLP of the Land to the South of the A14 Services, Boxworth Site's suitability for employment development is welcomed.

The proposed allocation and the economic benefits that it will entail is also supported by the findings of the Greater Cambridge Local Plan: Sustainability Appraisal (July 2026) prepared by LUC, which notes in paragraph 5.755 that:

> *"The policy sets out that the development at Land to the South of Cambridge Services, A14 is to be delivered as a large rural employment site in the plan area. There is capacity for approximately 90,000 metres square gross internal area of general industrial, storage and distribution uses which will support a flexible range of appropriate small and medium-scale units. There is also capacity for approximately 2.25 hectares focused on lorry parking to provide around 150 spaces. The allocation will help to meet local needs for industrial, local warehousing and logistic employment space in the area. As such significant positive effects are recorded in relation to SA objective 14: Economy. Given that the policy will support access to jobs for residents in the plan area; with good access provided via the A14; minor positive effects are recorded in relation to SA objective 15 (Employment)".*

Jaynic are working with the landowners, the Pearson family, and in collaboration with University of Cambridge, to realise the policy aspirations for the Site, which is available for the development of employment floorspace.

Jaynic promotes land through the planning system for residential and employment use and develops high quality business space. With a particular focus on East Anglia, they are one of the most active developers in the region, having physically implemented 15 major phases of enabling infrastructure and completed over 3 million square feet of warehousing and office development.

The vision for Land to the south of Cambridge Services, A14 is for a high quality (Class B2 or Class B8) use, in a strategic convenient and accessible location alongside the A14. The location has potential to provide development to support the needs of Greater Cambridge and the local economic area. In addition, the proposals will:

- Directly contribute towards alleviating the existing critical shortage of HGV parking spaces. There is also the opportunity to provide improvements to HGV circulation around Cambridge Services with a design that reduces the prospect of inertia between vehicles accessing and HGV's exiting the Site which periodically leads to traffic waiting at the roundabout at the Site entrance and queues and parking along the slip road.

- Preserve the existing landscape features and establish a strong, well-landscaped buffer to the countryside edges to help reduce the visual impact of new buildings from the wider landscape.

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- Improve connections between the new development and the local area, including the existing Cambridge Services and the A14 footpath, encouraging the use of sustainable transport options:

- Incorporate, in the construction and design of the new buildings, strategies to ensure the development is as sustainable as possible, through the promotion of energy, waste, and resource efficiency.

- Make use of otherwise poor-quality former depot land to ensure an overall biodiversity net gain.

The key benefits of the proposed scheme are:

- Around 90,000m² of Classes B2 or B8 use floorspace, contributing to the identified employment need in support of the local economic area. This would meet just over 31% of the need identified for Greater Cambridge.

- Approximately 150 new HGV parking spaces, including provision for active and passive e-HGV charging and direct access to existing amenity and welfare facilities.

- Extensive landscape buffering along the Site boundaries to mitigate visual impact arising from development as well as tree planting and open space within the development for occupiers and employees.

- The expanded HGV provision at Extra Services will allow a redesign of traffic flows around the Services, reducing potential conflicts between cars and HGVs, which can at times lead to traffic backing-up on the roundabout.

- Provision of jobs in a range of sectors for local residents. In addition, the scheme will support indirect employment opportunities beyond end-users, including ancillary and service-sector roles.

- Preserving the Site's existing habitats, flora and fauna to ensure biodiversity net gain, improving the biodiversity and habitat value through native species planting.

- Opportunity to improve pedestrian and cycle linkages between the development and the local area, encouraging the use of sustainable transport options.

It is the aim of both Jaynic, as the developer, and the landowners that development of the Site will have begun on site within the next five years, as Greater Cambridge envisage.

In order to understand the technical constraints of the Site, the expert technical team has undertaken a series of technical studies and surveys. Details of these are set out in full within the Vision Document that accompanied the Reg.18 submission that was made on the site.

This includes a landscape and visual analysis of the Site where views of the Site have been assessed from roads, public rights of way and nearby residences. For road users along the A14 and Boxworth Road, the Site has low-sensitivity with short-duration views and is well screened by a dense landscape buffer and existing development to the north. Views from nearby residential receptors are largely screened by topography and existing vegetation, however there would be moderate adverse effects on some views from nearby Public Rights of Way, in particular Bridleway 150/1. These effects would be mitigated by a proposed landscape buffer around the site perimeter. A LVIA assessment will be undertaken in accordance with the guidance set out in the Guidelines for Landscape and Visual Impact Assessment - Third Edition (GLVIA3). It is proposed to extend approximately 5km from the centre of the Application Site and encompass the full extent of the estimated Zone of Visual Influence (ZVI).

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A Preliminary Ecological Assessment (PEA) was undertaken in 2025, comprised an UK Habitat Classification Survey, which included mapping the habitats within the Site and undertaking an assessment of the Site and adjacent habitats to support protected and notable species. Results from this survey were used to inform the scope of further ecological surveys.

The PEA established baseline conditions and was used to evaluate the importance of any ecological features present (or those that could be present) within the Site, as far as possible. The results of PEA formed the basis for more detailed or specific ecological surveys as required. The following ecological receptors are currently subject to further survey during the 2025/26 season:

- Bats - activity surveys/automated detector surveys;
- Birds - breeding and wintering surveys;
- GCN habitat suitability assessment and presence / likely absence surveys (via environmental DNA surveys);
- Reptile presence / likely absence surveys;
- Otter and Water Vole surveys; and
- Other notable species assessment.

No likely significant effects relating to hydrology or drainage are anticipated.

An Air Quality Assessment will be prepared separately in support of the planning application, proportionate to the nature and scale of the Proposed Development.

A Noise Assessment has already been prepared separately in support of the planning application and demonstrates the suitability of the site in terms of noise.

The heritage impact of the Proposed Development will be considered in a Heritage Statement which will support the planning application.

Policy also requires any development proposals to be supported by an appropriate archaeological assessment. Oxford Archaeology have undertaken an archaeological desk-based assessment for the development. Whilst there have already been excavations onsite, further geophysical surveys and trial trenching will be carried out across the Site to confirm the presence, condition and significance of any remains. This will inform the extent of mitigation required for future development.

In summary, the technical work undertaken has raised no constraints that could prejudice delivery of the Site. It is considered that any impacts can be appropriately mitigated. The work has been carried out to confirm that development as sought through draft Policy S/RRA/SCS is deliverable.

The fact that an Environmental Scoping Opinion Request was submitted in August 2026 (registered under ref; 26/03096/SCOP) for the *Proposed introduction of employment type uses (Use Classes B2 and B8) along with additional lorry parking and improved access arrangements* demonstrates Jaynic's commitment to the early delivery of the Site.

The draft Policy requires the delivery of additional lorry parking with associated facilities. Supporting text identifies that this is needed to address an identified need for overnight lorry parking provision in this area.

We would highlight that the need for lorry parking improvements on the Site is now critical. This therefore forms a key element of Jaynic's proposals for the Site and Jaynic are working with Extra Motorway Service Area Group (the owners of Cambridge Services) accordingly. Extra Motorway Service Area Group have confirmed to Greater Cambridge directly their support for draft Policy S/RRA/SCS on the basis of significant need for additional HGV parking spaces to meet current and future demand in this location. We reaffirm the key details driving this support within these representations.

Cambridge Services has existing HGV and car parking areas as set out below:

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- 132 HGV Parking Spaces;
- 525 Car / LGV spaces (of which 20 are Disabled Driver spaces);
- 24 Coaches; and
- 12 Caravans.

Since the A14 scheme was completed, the facility has experienced significant growth in demand for HGV parking. Whilst the most recent improvement scheme was designed to accommodate expected flows, demand already exceeds capacity at nights when the demand for lorry parking peaks.

The Lorry Parking Demand Assessment (LPDA) was published by the Department for Transport (DfT) in August 2024 and was prepared to provide National Highways with an assessment of lorry parking demand on or close to the SRN. The study shows that there is high off-site HGV parking demand on the A14 in the East of England, with 'critically utilised' lorry parks found on the M6/A14 between Birmingham and Cambridge.

Cambridge Services are identified in this work as having 93% lorry park utilisation and thus the need for additional capacity 'critical.' Indeed, Extra's own data suggests that there are occasions where peak lorry parking demand at the Services is close to 200 spaces, well in excess of existing HGV parking provision on the site. There is a clear need for additional parking spaces.

There is evidence of HGVs having to park on the public highway when the site is at capacity and driver time limits prevent travelling further to the next MSA. The shortage of parking provision is also beginning to cause concerns both in terms of vehicle parking within the facility in non-HGV parking areas, but also evidence of HGVs parking on the local slip roads.

The site currently caters for up to 40,000 vehicles per week, of which nearly 4,000 are HGV movements. This is significant in the context of existing flows on the A14 and accounts for nearly 10% of all movements on the A14 daily. The level of demand and usage of any MSA is directly related to the level of traffic using the network it serves. Based on the National Highways application for the A14 improvement scheme the traffic flows past the Site on the A14 are forecast to increase to 106,000 by 2035. This equates to an increase of around 30% from the current flows and therefore weekday average HGVs passing the Site could increase to as much as 27,000 per day based on the AAWT figure.

The importance of Service Areas is clearly set out in paragraphs 74 and 79 of Circular 01/2022 (Strategic Road Network and the Delivery of Sustainable Development). The Circular sets out minimum requirements in relation to HGV parking requirements based on the HGV flows on the SRN that it serves. Whilst this was previously set at 0.5% of the daily HGV & coaches within Circular 02/2013, the new Circular refers to a figure of 1% in areas where there is an "identified need". With regard to 'identified need', Cambridge Services was shown to be operating with 'critical' levels of utilisation when the study was undertaken in 2023. On this basis, and taking into account the first-hand experience on site, the higher figure of 1% is appropriate here.

Based on the 2024 peak month recorded AADT HGV flows on the A14 included within the Needs Assessment, there is an existing requirement for 186 HGV spaces at the services. In the future, this would increase to around 242 spaces taking into account the growth predicted by NH as part of the work undertaken for the A14 improvement scheme.

The Draft Local Plan makes an allowance for an additional 150 lorry parking spaces which if provided would bring the total at the Services to 282 (132 existing plus 150 additional). This would be sufficient to accommodate the 242 spaces derived above in relation to forecast growth and would be equivalent to approximately 86% utilisation.

In addition to the benefits identified above, the expansion space created by the proposed allocation incorporating land to the east would also allow a redesign of the traffic flows around the Services, which would help to reduce the potential conflict between cars and HGVs, which can at times lead to traffic backing-up on the roundabout.

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The need to alleviate existing pressure on Cambridge Services through the provision of new lorry parking is current, as is the evidenced demand for new employment floorspace.

The timeline for submission of a planning application needs to be considered in this context. Any formal details submitted to Greater Cambridge ahead of the formal adoption of the Local Plan will further substantiate the deliverability of development proposals that meet with draft Policy aspirations.

The continued allocation of the Site through Draft Policy S/RRA/SCS: Land to the South of Cambridge Services, A14 is strongly supported and the delivery of the Site to meet existing employment floorspace needs and delivery of much needed additional HGV parking spaces is greatly welcomed.

As already highlighted above, whilst Draft Policy S/RRA/SCS: Land to the South of Cambridge Services, A14 is supported, we believe that a number of minor amendments are needed to specific parts of the policy wording.

In order to ensure that the capacity requirements of the allocation are delivered, there is a requirement for the Site Area to be increased to 26.82ha. It is proposed that the landscape buffer to be delivered to the south of the site is pushed to the southern site of the current site boundary. An updated Site Location Plan (DR-A-0100 RevP02) accompanies the Representations.

Criterion 1a requires that site boundaries provide landscape buffers of a minimum of 25 metres wide. We believe that the landscape buffer requirements should be more flexible in order to reflect the actual levels of landscape sensitivity applicable to different sections of site boundary and to accommodate utility constraints.

Criterion 1b requires that existing balancing ponds are re-profiled and enhanced for biodiversity net gain and to address surface water flooding. In response to this requirement, it is important to note that there are no existing balancing ponds on site. The land has been restored by National Highways and the balancing ponds removed.

Criterion 1c states that building heights must be sensitive to the local rural context, the existing vegetation should be utilised to screen the development in long-distance views.

Criterion 1h(i) references new and improved active travel infrastructure, including connections to Boxworth. We do not feel that there is a requirement for connections with Boxworth to be delivered and this view is shared by both the LPA and Boxworth Parish Council. We are concerned that such provision would be prohibitively expensive and non sensical given the very small pool of potential labour available in Boxworth.

Criterion 1h(ii) refers to bus service improvements to serve the Site, including off-peak services to cover shift patterns, with connections to nearby railway stations. We do not feel that there should be a requirement for the site to deliver connections to nearby railway stations. Instead, the policy should reference provision of an on-demand bus service, which will fulfil the same policy aim, but be far less onerous. Instead, it should refer to links to the guided busway, which provides links with Cambridge North Railway Station.

Criterion 1h(iii) refers to the provision of an on-site Mobility Hub. In our opinion, the size of the Site is too small for buses to enter and turn around within. Instead, we believe that the focus should be on meeting requirement on each plot through the provision of showers, lockers, cycle stores and through engagement with CCC Highways and the local bus operators. Discussions have been held with the local bus operators including; Stagecoach, Whippet, and Stephensons regards their desire to introduce bus stops at the site entrance on Boxworth Road.

Criterion 1i(v) requires that development proposals demonstrate how financial contributions towards and, as appropriate, enabling any other transport measures necessary will make the development of the site acceptable in transport terms. We consider this requirement to be contrary to be unclear and too subjective, with no definition of how ‘acceptable’ would be assessed. Accordingly, we consider that at present this criterion to be contrary to the content of the NPPF (August 2026). Furthermore, it

Classification L2 - Business Data

fails to take into account the fact that the Greater Cambridge Authorities are seeking to also introduce a Community Infrastructure Levy (CIL) in the near future.

Proposed Amendments

The proposed changes to Policy S/RRA/SCS: Land to the South of Cambridge Services, A14 are that:

1. **The Site Area outlined within the first Bullet Point of the Policy to be amended and increased from 24.58ha to 26.82ha. This is shown on updated Site Location Plan (DR-A-0100 RevP02).**

2. **Criterion 1a be amended to "Site boundaries to provide landscape buffers of a minimum 25m to the most sensitive boundaries, 20m to moderately sensitive boundaries and 5m to lower sensitivity boundaries, as identified in the LVIA, to mitigate adverse landscape impacts of built form and light pollution, with open space and tree planting provided throughout the site as part of a landscape-led masterplan".**

3. **Criterion 1b to be amended to remove reference to existing "balancing ponds to be reprofiled".**

4. **Criterion 1c be amended to "Building heights shall respond sensitively to the local rural context and the landscape sensitivity of the site as identified in the LVIA, with taller buildings located away from the most sensitive boundaries and appropriately integrated within the landscape-led masterplan".**

5. **Criterion 1h(i) to be amended to remove reference to connections to "Boxworth".**

6. **Criterion 1h(ii) be amended to "Bus service improvements to serve the site, including associated infrastructure enhancements and on-demand services to cover shift patterns, with connections to the guided busway, which offers onward links to railway stations, Cambridge, Cambourne (including the planned allocation at Cambourne North), Northstowe, St Ives and other nearby villages".**

7. **Criterion 1h(iii) be amended to "Provision of appropriate on plot facilities for those arriving by walking, wheeling, cycling and public transport".**

8. **Criterion 1i(v) be amended to "Financial contributions will be sought to address the provision of transport infrastructure necessary to make the development of the site acceptable in transport terms., where this will not be funded via CIL payments.**

9. **The Plan at Figure 92 (Site Plan of S/RRA/SCS Land to the south of Cambridge Services, A14) to be updated to reflect revised site allocation red line boundary.**

10. **Within the Supporting Information to the Policy, the site area outlined within Para. 3.5.13 to be amended to 26.82ha.**

Policy BG/BG: Biodiversity

Object

These representations are submitted on behalf of Jaynic Properties Ltd (Jaynic) in support of land allocated (draft Policy S/RRA/SCS) at Land South of Cambridge Services, A14 (the Site) for employment development.

Classification L2 - Business Data

The Site is available and deliverable.

An updated Vision Document is submitted alongside these representations which confirm that Jaynic's development proposals will deliver the policy aspirations for the Site, as set out through the Proposed Submission Greater Cambridge Local Plan.

The statutory requirement is that developments provide a minimum of 10% Biodiversity Net Gain. This is made clear in draft Policy BG/BG: Biodiversity.

Jaynic are committed to delivering 10% in their development of Land at Cambridge Services and aspire to achieve enhancements greater than this. It is not considered that 20% is an appropriate baseline requirement that is appropriate to be applied to all major development, without proper regard to Whole Plan Viability.

We object to the requirement in draft Policy BG/BG that development must provide a minimum 20% biodiversity net gain. This is contrary to Policy N1: Identifying Environmental Opportunities and Safeguards in the NPPF (August 2026). In particular, paragraph 2, which states that:

> *"Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain".*

In our opinion, local standards for biodiversity net gain which are in excess of the statutory net gain requirement cannot be justified and would not be deliverable.

Proposed Amendment

The proposed change to Policy BG/BG: Biodiversity is that:

11. **The policy is amended to seek only a 10% Biodiversity Net Gain in accordance with the NPPF.**

Policy WS/IO: Creating Inclusive Employment and Business Opportunities Through New Developments

Object

These representations are submitted on behalf of Jaynic Properties Limited (Jaynic) in support of land allocated (draft Policy S/RRA/SCS) at Land South of Cambridge Services, A14 for employment development.

The policy requires that new developments of 1,000 square metres or more gross floorspace that fall within Use Classes E (commercial, business and service); B2 (general Industrial), B8 (storage and distribution); C1 (Hotel); F1 (learning and non-residential); F2 (local community) and Sui generis will be required to submit and implement an Employment and Skills Plan for both the construction and occupation stages of the development. A development that forms part of a larger development which would cumulatively exceed the 1,000 square metres threshold would also be required to deliver a Skills and Employment Plan.

It is stated that whilst Employment and Skills Plans will be agreed on a site-by-site basis, they will be expected to include:

Classification L2 - Business Data

a. How and when the developer will, as a minimum, deliver the benchmarks for the development use and gross development value set out in the latest version of the Construction Industry Training Board (CITB) National Skills Academy for Construction (NSAfC) Project Based Approach guidance and benchmarks;

b. Where required by this policy, how and when the developer will, as a minimum, deliver the employment and training targets in the occupation stage of the development;

c. How these opportunities will be made available to local residents who have difficulty accessing the labour market and/or who would not have traditionally accessed the career paths available through the development; and

d. How procurement opportunities associated with the construction and occupation phases will be promoted to local businesses and what support will be available to them to understand the tendering process.

We note that p.140 of the Aspinall Verdi Greater Cambridge Local Plan Viability Main Viability Report (Regulation 19 Stage) - July 2026 states that the cost of preparing and monitoring Employment and Skills plans is expected to be modest relative to scheme size. We believe that this underestimates the likely time and complexity of completing the Employment and Skills Plans

Further to this, we are particularly concerned regarding the incorporation of rigid and inflexible targets within the policy.

Section 4.requires that development proposals must secure 20% of all jobs created by the construction phase of the development for local residents. Whilst the aspiration to ensure job creation for local people is supported, it is not clear what evidence is available to demonstrate that this rigid requirement figure is either appropriate or achievable throughout the Greater Cambridge area taking into account the existing and likely labour market this policy would be drawing upon.

Additionally, Section 5 specifies that applicable development proposals must provide a minimum number of supported employment places to local residents during the occupation phase of the development, calculated using the formula set out in the supporting text to this policy.

Section 9 goes on to state that developers will be expected to use reasonable endeavours to implement the agreed Employment and Skills Plan. The developer will be required to provide monitoring reports for review by the councils on the implementation of their Plan at agreed regular intervals. Should instances occur where the target outputs in Employment and Skills Plans are not met or are partially met and the councils consider that reasonable endeavours have not been made an equivalent contribution for the shortfall in outputs will be sought by the councils.

We are fully supportive of the overall aims of the policy to provide jobs for local residents, which is highly laudable. However, we have serious concerns regarding the operation and practical application and enforceability of this policy, including the implications where insufficient capacity or capability exists in the labour-force to service the policy demands. It also raises practical questions as to the implications for organisations already operating within the area who may be seeking to relocate to new premises and the potential impact upon their existing labour force which may not comprise the ratios being sought through the occupation phase calculator. It would be perverse to discourage existing businesses and institutions from improving their accommodation through fear of otherwise being challenged by planning policy, whilst the strict wording also raises questions of compatibility with employment law centred around discrimination.

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Furthermore, it must be recognised that the Greater Cambridge Authorities are also intending to introduce a Community Infrastructure Levy (CIL) in addition to S.106 policy contributions. Consequently, we are concerned that the overall viability of employment provision could be threatened by any overly onerous policy requirements.

Proposed Amendment

The proposed change to Policy WS/IO: Creating Inclusive Employment and Business Opportunities Through New Developments is that:

- The policy be substantially rewritten in order to remove overly rigid target figures and incorporate much greater flexibility in order that it is capable of actual implementation across the Greater Cambridge area..

Policy J/AW: Affordable Workspace and Creative Industries

Object

These representations are submitted on behalf of Jaynic Properties Limited (Jaynic) in support of land allocated (draft Policy S/RRA/SCS) at Land South of Cambridge Services, A14 for employment development.

Section 1 of the policy states that proposals for new office and R&D development (use classes E(g)i and E(g)ii) over 1,000 square metres will be required to provide a minimum of 10% of net additional floorspace (GIA) as affordable workspace.

It is stated that within the Defined Development Extent of Cambridge and allocations on the edge of Cambridge, and within specified established science and business parks in Greater Cambridge and proposed extensions to these allocated within this Plan, the affordable workspace discount should be a minimum of 30% below prevailing market rents in perpetuity.

Whereas within South Cambridgeshire, outside the Defined Development Extent of Cambridge and specified established science and business parks, the affordable workspace discount should be a minimum of 20% below prevailing market rents in perpetuity.

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

Section 3 of the policy specifies that the details of the form and nature of affordable workspace to be provided will be agreed with the councils on a case-by-case basis. However, it is specified that affordable workspace schemes must be operated and managed by an affordable workspace provider on the Councils' approved list; or by the owner, or alternative party, where it is demonstrated to the satisfaction of the council that they have the necessary skills and experience.

It goes on to specify that the affordable workspace should be made available for occupation at the same time as, or prior to, the first occupation of 50 percent of the non-affordable element of the remaining economic floorspace in the development, unless justified on site specific circumstances. The 50% threshold may be reviewed through viability evidence or phasing discussions on particularly large or complex schemes; and

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Section 4 of the policy stipulates that payment in lieu will only be acceptable in narrowly specified circumstances.

The supporting text states that for all schemes that provide affordable workspace, the Council will require an annual monitoring report to be submitted to show how policy requirements are being met. This requirement will also be secured via a Section 106 agreement. The Council's approved list of affordable workspace providers will be developed ahead of adoption of this Plan.

We note that p.144 of the Aspinall Verdi Greater Cambridge Local Plan Viability Main Viability Report (Regulation 19 Stage) - July 2026 states that for the purposes of its assessments, it has tested a 40% discount on 20% of the space, applied to R&D/office, Office, Industrial/Storage B2/B8, and General E Class typologies. On the basis that if this is viable, the report argues that 10% of floorspace and / or a 30% discount will also be viable.

Whilst supportive of the objectives behind the policy, we believe that it is important to recognise that in many instances it will not be operationally appropriate or practical to deliver affordable workspace on-site. We are also aware that in London similar affordable workspace policies have been found to be unworkable, despite the London Plan recognising that Boroughs should tailor such policies to meet the specific circumstances of their areas. Furthermore, it must be recognised that the Greater Cambridge Authorities are also intending to introduce a Community Infrastructure Levy (CIL) in addition to S.106 policy contributions which has the potential to impact scheme viability alongside any additional development costs such as this policy which would erode future scheme capital and revenue values.

We are also very concerned that the policy will ultimately act to adversely impact the supply or uptake of employment provision as many developers and/or prospective tenants are likely to be deterred by the associated costs, complexities and liabilities associated with the Affordable Workspace and Creative Industries policies.

Proposed Amendment

The proposed change to Policy J/AW: Affordable Workspace and Creative Industries is that:

- The policy be deleted from the Plan or substantially reworked to provide a more flexible approach to deviations where factors of viability or other material considerations direct an alternative approach.

Carter Jonas – September 2026

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