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Dear Sir/Madam

Greater Cambridge Local Plan: Preferred Options (Regulation 18) Representation on behalf of Lolworth Developments Limited

We write on behalf of our client, Lolworth Developments Limited ('LDL'), a subsidiary of Salhia Real Estate, to make a representation to the Greater Cambridge Local Plan (Regulation 18) ('GCLP') consultation, which runs until 30 January 2026.

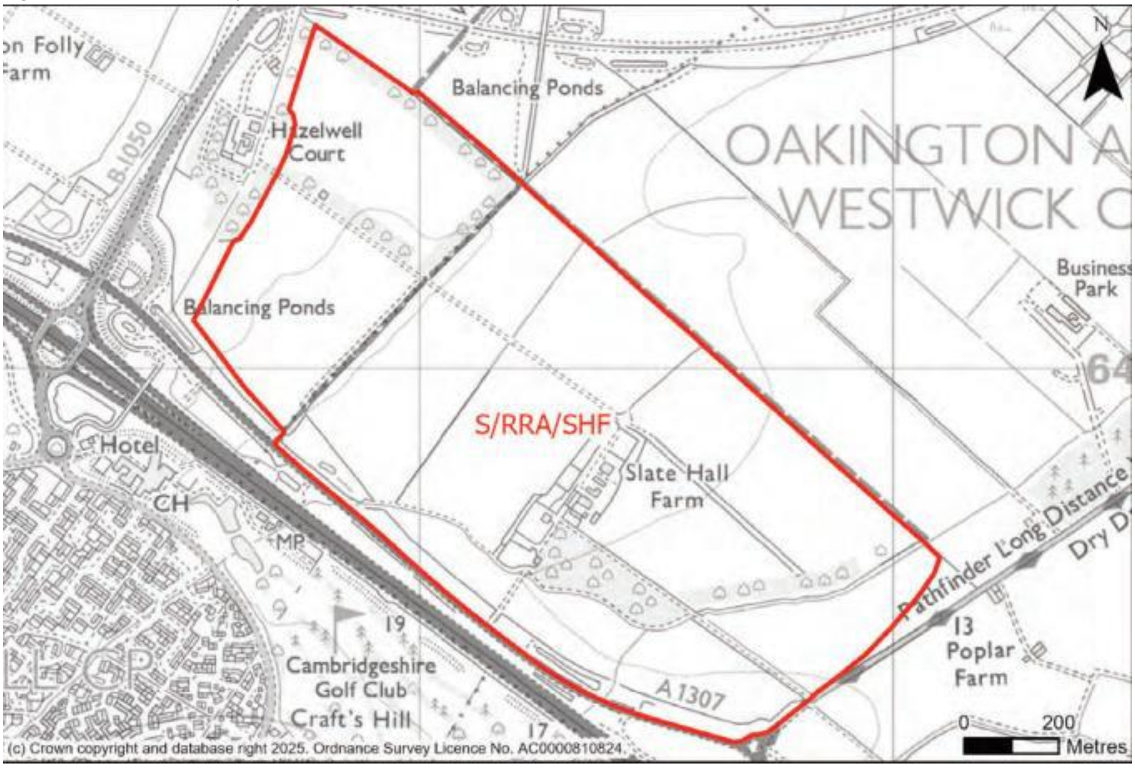
We write further to our representation to the previous Regulation 18 version of the Local Plan (13 December 2021) and our subsequent GCLP submissions, including our Call for Sites response submission (7 March 2025).

Cambridge 25 and Policy S/SHF site allocation

LDL is actively promoting the Cambridge 25 site on the north side of the improved Junction 25 of the A14, opposite Bar Hill, for a sustainable employment park development with business and logistics capability and capacity.

The Cambridge 25 site forms the primary part of the proposed site allocation '*Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)'* in the draft GCLP for a major employment site. The Site Plan for the allocation is shown at Figure 1.

Figure 1 Site Plan of Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



Source: Draft GCLP Figure 109

Structure of Representation

This representation comments on the nine policies with supporting information contained in a number of separate appendices, as set out below. As requested, we have also submitted each policy response separately, via the online consultation system.

- Policy S/JH: New jobs and homes
- Policy S/DS: Development strategy, and accompanying:
  a. Market Demand Assessment, Savills (January 2026) - **Appendix 1**
- Policy S/SHF: Land north of A1307 Bar Hill (Slate Hall Farm). The Annex (**Annex 1**) at the end of this letter sets out our recommended changes to Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm), and accompanying:
  a. Site S/SHF Site Allocation: Indicative Masterplan (Chetwoods, January 2026) - **Appendix 2**
  b. Slate Hall Farm Building Heritage Appraisal Statement (RPS, January 2026) - **Appendix 3**
- Policy J/NE: New Employment Development Proposals, and accompanying:
  a. Market Demand Assessment, Savills (January 2026) - **Appendix 1**
- Policy CC/NZ: Net zero carbon new buildings

- Policy BG/TC: Improving tree canopy and the tree population
- Policy GP/LC: Protection and enhancement of landscape character
- Policy J/AW: Affordable workspace and creative industries
- Policy I/SD: Servicing and last-mile deliveries

Policy S/JH: New jobs and homes

LDL welcomes the updated draft Policy S/JH: New jobs and homes that (inter alia) sets a target of 73,300 additional jobs over the Local Plan period from 2024 to 2045.

The Greater Cambridge Employment and Housing Evidence Update 2025 ('GCEHEU 2025'), which has informed the emerging policy, takes into consideration the latest market signals and applies the necessary adjustments to inform the employment policy requirements. According to this, there is a need for 317,000 sq.m of industrial and warehousing space by 2045 (alongside a need for over 302,000 sq.m of office and 600,000 sq.m of R&D space). This figure updates the underestimates of floorspace requirements set out in the Council's earlier evidence base work (i.e. which only identified up to 60,000 sq.m of industrial and warehousing need). The revised figures comprise a far more reflective estimate of the market activity across the area.

The GCLP (paragraph 2.11) highlights that there is also *"a higher growth forecast, placing greater weight on rapid growth in the recent past, particularly in key sectors, and that it is recommended providing flexibility in employment land in case the market delivers more jobs than anticipated"* [Lichfields emphasis]. Therefore, the Council recognises the potential for further employment growth over and above the identified need position across the plan period.

On a similar basis, the GCEHEU 2025 discusses suppressed demand matters and suggests that, if an 8% availability rate was assumed, there would be an even higher need for industrial and distribution floorspace of 360,000 sq.m (GCEHEU, paragraph 5.26).

Whilst the GCLP is being prepared under the current local plan system and must be consistent with the present National Planning Policy Framework ('NPPF', December 2024), the direction of travel in national policy is also relevant. This is particularly the case when the Government has indicated that *"Development plan policies which are inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework…"* (draft NPPF December 2025 Annex A, paragraph 2). It will seek to publish the NPPF on a timescale that is expected to precede the timing of the Reg19 GCLP.

Consultation draft NPPF Policy E1 highlights the importance of a clear economic vision aligned with the strategic and local economic development strategies to support business investment and employment locally. Moreover, the new draft NPPF gives significant emphasis to 'market signals' in both plan-making (Policy E1.2) and decision-making (Policy E2.2a) policies of Chapter 7 'Building a strong, effective economy'. This represents a clear recognition by the Government of the importance of responding to commercial property market activity in plan-making.

Synthesising the above, and also considering that the Council's evidence focuses solely on 'indigenous' needs arising within Greater Cambridge – and is neutral regarding the wider FEMA strategic requirements - there is therefore a need to treat these economic need figures as the minimum employment space requirement and allow for appropriate flexibility and a level of choice for different sectors, as well as to enable the higher growth scenario that reflects recent past trends.

Policy Recommendation

On this basis, LDL recommends that the supporting text (para 2.12) to Policy S/JH is amended as below

Building on the jobs forecasts, the EHEU 2025 identifies employment land needs for the 2024-45 plan period as follows, drawing also on market signals and stakeholder engagement, and incorporating a flexibility margin and allowance for vacant floorspace:

- *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 employment land figures will be treated as the minimum employment space requirements and to allow for appropriate flexibility and a level of choice for different sectors.

Policy S/DS: Development strategy

Policy S/DS: Development strategy sets out the proposed spatial distribution of jobs (and housing) growth across the area for the period to 2045 and beyond. In terms of the pattern of employment growth, there is a significant focus on the R&D sector, reflective of Greater Cambridge's economy.

Provision Quantum

Nonetheless, a total of 370,000 sq.m of industrial and warehousing space is proposed to be allocated (Policy S/DS 2b.i, 2c.2ii, 2e.i & ii) to support the local economy and to accommodate the significant demand for such space as indicated by the Council's evidence.

The GCLP aims to provide for a higher economic need figure (against the 317,000 sq.m minimum requirement); however, this is not considered sufficient 'headroom' to deal with anything more than the identified indigenous needs which, as indicated in the Council's evidence, totals 360,000 sq.m once the recent trends are considered.

Most of this allocation provision (i.e., 330,000 sq.m or 89%) is proposed in the 'Rest of the rural area' (Policy S/DS 1e, 2e(i),(ii)), with the remaining 40,000 sq.m or 11% industrial uses equally divided (20,000 sq.m each) between the edge of Cambridge (Policy S/DS 1b,2b(i)) and the expanded Cambourne (Policy S/DS 1c,2c(ii)).

Most of this industrial and warehousing supply relates to the Slate Hall Farm (the proposed site allocation) at Junction 25, A14 (for which LDL is the main promoter and stakeholder), where the new allocation for approximately 240,000 sq.m employment floorspace for industrial and warehousing uses (Policy S/SHF) accounts for some 65 % of the total allocation provision.

Policy S/DS2e(ii) states that: *"a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: including approximately 240,000m² employment floorspace for* *industrial and warehousing uses, with a mix of small-medium units to support the growth of a wide range of different businesses".*

This rightly highlights that the Council recognises that the draft site allocation should have a key role in meeting the future industrial and warehousing growth needs of Greater Cambridge over the next 20 years. It is also important to highlight that the size of the allocation site is capable of providing flexibility and choice to the market, in turn significantly enhancing availability in the Greater Cambridge which has been a very constrained market for a long period.

LDL is actively liaising with Council Officers to bring forward logistics and industrial development to significantly enhance the industrial and warehousing supply to meet the identified need.

Scale and Flexibility

However, LDL also considers that some parts of Policy S/DS2e(ii) require amendment to ensure alignment with national policy (NPPF 2024), as well as to provide the necessary flexibility to the market, on the basis that:

1 Current NPPF (2024) paragraph 87b highlights the importance of planning policies to address the specific locational requirements of *"storage and distribution operations at a variety of scales and in suitably accessible locations.."* [Lichfields emphasis]. The national policy gives weight to the sector's specific requirements and highlights the importance of providing a wide range of scales, in recognition of the sector's particular characteristics.

2 The draft NPPF (December 2025) Policy E1.2 goes further and states clearly that *"development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage)."* [Lichfields emphasis].

3 Moreover, draft NPPF Policy E1.1.c.ii states that development plans should *"c. Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period, paying particular regard to…making provision for:.ii. storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain (including 'last mile' deliveries), transport innovation and decarbonisation;.."* [Lichfields emphasis].

4 The Council's evidence, namely the Greater Cambridge Warehouse and Industrial Space Needs Report 2025 ('GCW&ISNR', paragraphs 5.7, 5.14, 5.18, 6.19, 6.24, 7.21), highlights that there is demand for larger-scale units in Greater Cambridge and gives particular emphasis to the A14 corridor. On this basis, the market signals demonstrate clearly the demand for a variety of scales of industrial and particularly warehousing units across Greater Cambridge generally and the A14 corridor in particular.

5 Furthermore, the latest market evidence from Savills (**Appendix 1**) highlights (in paragraphs 5.3.3 to 5.3.5) that there is no direct correlation between the size of units and the type of occupiers or the market being served. A fixed threshold does not determine the type of occupier or the market being served.

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6 In contrast, there are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units of a significant size. For example (based on data extracted by CoStar in November 2025 as combined with data presented in **Appendix 1**) the following companies already occupy large buildings in Greater Cambridge:

a. Hain Daniels (also known as Hain Celestial) occupies 290,000 sqft manufacturing and food processing facility in Histon. This is an US food producer with regional facilities in various locations in the UK, including Henley-upon-Thames, Leeds and the unit in Greater Cambridge, among others. As described in **Appendix 1** (Table 5.1), the site was originally occupied by the Chivers family- i.e., the largest producer in the country (, who began jam production in the 1870s). The operations were replaced by Premier Foods, who bought redeveloped the facilities, and then was purchased by Hain Daniels, who continue to produce jam from the site, among other products.

b. Huntsman Advanced Materials, who occupy 250,000+ sqft in Duxford, is a leading global (US interests) material solutions provider. The Duxford facility's key products and services include epoxy adhesives, methacrylate adhesives, aerospace systems, polyol systems, isocyanate adhesives, epoxy filters distributed across Europe, Africa and Middle East. There are two more facilities in the UK, in Wilton, Redcar and King's Lynn.

c. Hexcel is a leading producer of advanced structural materials, with a significant presence in the UK, particularly at its Duxford site, where they occupy a large unit of over 385,000 sqft split in various subunits. Founded in 1934, Hexcel specialises in carbon fibre reinforcements and resin systems and is recognised as the world leader in honeycomb manufacturing for the commercial aerospace industry. The Duxford facility manufactures a wide range of products, including prepregs and adhesives, for applications in aerospace, defence, and automotive sectors.

d. Fred Smart Logistics (**Appendix 1**, Table 5.1) currently occupies a 120,000 sqft in Papworth Everard. The company is part of the Frederic Smart & Son Ltd which started as an agricultural products trader locally. The company initially established its presence in Whittlesford in 1919 when it bought a mill and since then it has continued to expand its operations.

e. Cambridge University Press & Assessment (**Appendix 1**, Table 5.1) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use, with about 5% of the floorspace for offices. In particular, the warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.

7 A restriction of larger industrial units is unique across the markets of other comparable locations – i.e., those with similar economic and market characteristics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich (**Appendix 1**, Section 3.6, pg. 21-22). In particular, an analysis of the industrial and warehousing leasing activity across various unit scales in those areas demonstrates that all other locations have significantly higher activity in units above 100,000 sqft, with Oxford recording the highest (66% of leasing activity relating to units above 100,000 sqft since 2018). The equivalent in Greater Cambridge is just 11% (the lowest across the sample of other locations) relating to a single transaction in an older warehouse building, namely the CDC Building, by retailer White Stores. This highlights that similar markets need this segment of industrial provision to

function appropriately as well as indirectly implies that there is a substantial market gap in the stock offer of Greater Cambridge.

Over the last eight years and since the South Cambridgeshire LP Policy E/11 adoption, there have been existing businesses, namely Marshalls and DHL (**Appendix 1**, paragraphs 5.1.2, 5.4.6 to 5.4.8) that have had to relocate away from Greater Cambridge due to a lack of availability of premises of sufficient scale.

Extrapolating these trends, the latent demand for larger-scale units will continue increasing, and the lack of such provision will displace investment further away and jeopardise the retention of existing businesses if they are unable to accommodate their growth plans within Greater Cambridge.

In summary, the fact that national and international providers already have a presence in the area should be taken into consideration as part of the market dynamics locally, alongside the fact that there are local businesses that cannot accommodate their growth plans locally and are forced to move out of the area.

Synthesising this evidence, we consider that the justification for this policy, seeking to limit commercial uses to small- and medium-sized units, is plainly not justifiable, nor aligned with national policy. To the contrary, it will actively constrain local growth, contrary to national policy. The Jobs Topic Paper (paragraph 3.42) implies that only regional and national distributors have large size requirements above 100,000 sqft, and it is a policy choice to *"continue the approach included in the adopted South Cambridgeshire Local Plan 2018"*. This conflicts with the NPPF and contradicts the market signals and the market demand reported in the Council's own evidence and that included at Appendix 1. <u>If this policy were to remain unchanged, it will likely distort the functioning of the market, by limiting flexibility and choice to meet business needs on the principal and largest employment allocation site in the GCLP.</u>

Policy Recommendation

On this basis, LDL recommends that Policy S/DS2e(i) is amended as below:

> *"e. In the Rest of the Rural Area:*
>
> *i. Slate Hall Farm, Junction 25, A14 – a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: including approximately 240,000m² employment floorspace for industrial and warehousing uses, with an appropriate mix of ~~small-medium~~ unit sizes to support the growth of a wide range of different businesses and respond to the changing needs of the industrial and warehousing sector in Greater Cambridge. .."*

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

LDL welcomes draft Policy S/SHF and, as the primary landowner/stakeholder of the proposed site allocation, will liaise with the Council to successfully implement the allocation and contribute significantly to the economic vision and growth priorities of the GCLP.

The Site Allocation Topic Paper ('SATP') finds that the site offers *"…the best location in terms of meeting key locational preferences…"* identified in the GCW&ISNR and goes on to explain the reasons why (para 7.15).

The SATP also identifies that the site allocation reflects the agglomeration of two site promotions (para 7.12). The other promoter is the owner of the Slate Hall Farm existing employment area, indicatively identified as the 'Employment Led Development' area on GCLP Figure 108. LDL is capable of both bringing forward its land for development independently and to incorporate and facilitate the bringing forward and accessing the smaller part of the allocation site. LDL is actively liaising with this fellow site promoter on bringing forward their development land as part of a co-ordinated and comprehensive phased delivery of the whole allocation site, as demonstrated by the S/SHF Site Allocation: Indicative Masterplan (at **Appendix 2**).

The 'Vision and identity' section (points 1 to 3) sets out the objectives of the allocation. We concur with point 1 that, aligned with the NPPF and its proposed revisions, *"It will provide a range of logistics and industrial uses that can support the long-term needs of the Greater Cambridge population and economy"*

Development Capacity

The 'Uses' section (point 4) sets out the proposed land use provision and approximate quantum of the development in the allocation. It identifies that the site allocation has *"…capacity for approximately 220,000 sq.m GIA of commercial uses providing a flexible range of small-to-medium scale units…"*. The indicative capacity has been informed by various parts of the GCLP Evidence base.

Policy S/DS (e) states: *"Slate Hall Farm, Junction 25, A14 – a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: <u>including approximately 240,000m2 employment floorspace for industrial and warehousing uses</u>, with a mix of small-medium units to support the growth of a wide range of different businesses;"*

The Site Allocations Topic Paper (SATP, para 7.12) states that - *"Consideration of site capacity: The site has been proposed by two site promoters. <u>The larger proportion existing of the whole site allocation with the exception of Slate Hall Farm and the existing employment area proposed 240,000 sqm of employment floorspace.</u> The existing employment site has separately been nominated through the call for sites process and these two sites have been brought together. This will enable the site to be planned for and delivered holistically."*

The SATP (para 7.13) then explains that - *"The eastern part of the site is identified for green infrastructure, water management and biodiversity improvement. The developable area of the site is around 70 hectares, but also includes hedgerows and other features including a bridleway that need to be incorporated into green corridors and other mitigation. Applying a plot ratio of 0.3, would deliver a capacity of approximately 220,000 square metres which would need to be refined through a landscape lead masterplanning process."*

GCSP have, in estimating a 70 ha developable area and 0.3 plot ratio, adopted a cautious approach to confidently identify a minimum capacity that this allocation site might bring forward, to be considered against the employment need requirement. We consider that approach is an appropriate starting point for a local plan allocation but, as the SATP recognises, this estimate *"...would need to be refined through a landscape lead master-planning process."* LDL have adopted a landscape-led master-planning process for its site and the whole S/SHF site allocation. This has informed the emerging site masterplan, which was used to inform the 240,000 sq.m provision figure in the SATP (derived from the LDL team and the SHF promoters).

We therefore consider it appropriate to align the Development strategy and site allocation capacity estimates, by using the former (240,000 sq.m), given the previous LDL GCLP submission / evidence on development capacity and clarifying in policy S/SHF that the development quantum is to be established though a landscape-led masterplan process.

Unit Sizes

LDL's concern relates to the fact that, similar t0 Policy S/DS 2e(i), the second sentence of Policy S/SHF4, in stating *"small-to-medium scale units",* and the corresponding para 3.5.5 of the Supporting Information, are unnecessarily and overly prescriptive in relation to the type and size of units. This contradicts both the NPPF 2024 (paragraph 87b) and the draft NPPF (Policies E1.1.c.ii and E1.2) as well as the property market needs evidenced in the area (relating to both the Council's evidence, namely GCW&ISNR, and the recent market report attached in this representation (**Appendix 1**)). This (at paragraphs 5.3.3 to 5.3.5) demonstrates that, in commercial property market terms, the size of any unit does not directly relate to the market it serves - i.e., local or regional needs.

In particular, as noted above, it is evident that national and international providers already have a presence in the area as well as there are local businesses that were forced to move out of the area as their growth plans and requirements for larger premises were not accommodated. These points are discussed below:

1 The latest market evidence, as presented in **Appendix 1** (paragraphs 5.3.3 to 5.3.5), highlights that there is no direct correlation between the size of units and the type of occupiers or the market being served. A fixed threshold does not determine the type of occupier or the market being served.

2 There are already a number of both local and national/international companies in Greater Cambridge that occupy industrial units above 100,000 sqft. In particular:

    a. Hain Daniels (also known as Hain Celestial) occupies 290,000 sqft manufacturing and food processing facility in Histon. This is an US food producer with regional facilities in various locations in the UK, including Henley-upon-Thames, Leeds and the unit in Great Cambridge, among others. As described in **Appendix 1** (Table 5.1), the site was originally occupied by the Chivers family - i.e., the largest producer in the country (who began jam production in the 1870s). The operations were replaced by Premier Foods, who bought redeveloped the facilities, and then was purchased by Hain Daniels, who continue to produce jam from the site, among other products.

    b. Huntsman Advanced Materials, who occupy 250,000+ sqft in Duxford is a leading global (USA interests) material solutions provider. The Duxford facility's key products and services include epoxy adhesives, methacrylate adhesives, aerospace systems, polyol systems, isocyanate

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adhesives, epoxy filters distributed across Europe, Africa and Middle East. There are two more facilities in the UK, in Wilton, Redcar and King's Lynn.

c. Hexcel is a leading producer of advanced structural materials, with a significant presence in the UK, particularly at its Duxford site, where they occupy a large unit of over 385,000 sqft split in various subunits. Founded in 1934, Hexcel specialises in carbon fibre reinforcements and resin systems, and is recognised as the world leader in honeycomb manufacturing for the commercial aerospace industry. The Duxford facility manufactures a wide range of products, including prepregs and adhesives, for applications in aerospace, defence, and automotive sectors.

d. Fred Smart Logistics (**Appendix 1**, Table 5.1) currently occupies a 120,000 sqft in Papworth Everard. The company is part of the Frederic Smart & Son Ltd which started as an agricultural products trader locally. The company initially established its presence in Whittlesford in 1919 when it bought a mill and since then it has continued to expand its operations.

e. Cambridge University Press & Assessment (**Appendix 1**, Table 5.1) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use, with about 5% of the floorspace for offices. In particular, the warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.

3 In addition, it is important to highlight that compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich (**Appendix 1**, Section 3.6, pg. 21-22), the presence of larger-scale industrial units is significantly higher, highlighting that their markets need this segment to function appropriately as well as indirectly implying that there is a market's gap in the stock offer of Greater Cambridge.

4 As a result, the last eight years policy restriction, since the adoption of South Cambridgeshire LP Policy E/11 has already forced existing businesses away from Greater Cambridge due to a lack of availability of premises of sufficient scale. Examples include Marshalls and DHL (**Appendix 1**, paragraphs 5.1.2, 5.4.6 to 5.4.8).

Extrapolating these trends, the latent demand for larger-scale units will continue increasing, and the lack of such provision will displace investment further away and jeopardise the retention of existing businesses if they are unable to accommodate their growth plans within Greater Cambridge.

Furthermore, the Council's evidence, namely the GCW&ISN 2025, cites the 'Understanding demand for B8 premises across Greater Cambridge', authored by WSP in 2021 on behalf of Greater Cambridge Partnership and the Greater Cambridge Shared Planning Service, which presents the findings of the engagement with the industry (19 interviews with stakeholders), and indicates that there is latent demand for larger scale units in the area with emphasis on the need for medium- to large-scale B8 units.

On a similar basis, the justification (at paragraph 3.5.5 of the supporting information) should also be amended to delete size-specific references and also the threshold of "*less than 9,300 square metres (100,000 square feet).*"

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Employment Use Mix

We consider that the major employment park site allocation should not be restricted to B2/B8 uses only, given it is also suitable for E(g)(i) (Offices), E(g)(ii) (Research & Development) and E(g)(iii) (Light Industrial) employment uses. However, we concur that, as the site's strategic location and size makes it particularly suitable to meet the very considerable need for B2 and B8 employment uses, these should be the priority. However, there is merit in accommodating other complementary employment uses, both as part of the Employment Park mix and to accommodate smaller buildings as part of the masterplanning and design process, provided these collectively comprise a small proportion of the employment park development.

On this basis, and similarly to LDL's representation on Policy S/DS: Development strategy, we would also seek an amendment of Policy S/SHF4, as provided in **Annex 1** (further below).

Policy Requirements

Draft policy S/SHF, first explains the GCLP vision, identity and uses proposed within the allocation. It then sets out a series of policy requirements. We consider all of these considerations to be appropriate but not the use of the word *"must"* in the preamble, without qualification, as this implies that all requirements should be treated as 'policy absolutes'.

It is appropriate that applications are required to address each topic, but there may be good planning reasons for meeting a policy requirement differently, or other reasons to justifying departing from a particular criterion. There is also a need to assess whether harm arises from such an assessment and to consider that against the planning benefits when undertaking a 'planning balance' exercise.

We consider it is appropriate to address this point by amending and adding to the preamble as follows: *"…~~must~~ should do the following, unless justified otherwise".*

Context

We concur with paras 5–9, save for para 7 on heritage, because the Slate Hall Farm Building Heritage Appraisal Statement (RPS, January 2026) **(**at **Appendix 3)** has assessed that the Slate Hall Farm building and adjudged this to not be Non-Designated Heritage Asset.

We therefore consider para 7 should be deleted:

> *"7 ~~Mitigate the impact of the development on Slate Hall Farm, a potential nondesignated heritage asset, and its setting~~"*

Figures 106 and 108

We consider it necessary to correct or otherwise amend these two figures:

Figure 106 (Strategic Vision Area: for the Rest of Rural Area) inaccurately depicts the extent of Green Belt which runs to the boundary of the A14 and Dry Drayton Road; it does not include part of the Slate Hall Farm site allocation. The correct boundary is shown on the GCLP policies map (here) and should be amended accordingly.

Figure 108 (Spatial Framework for Policy S/SHF), whilst indicative, and should be identified as such, would benefit from greater accuracy and amendment to:

- revise the diagrammatic Retained Slate Hall Farm Non-Development Area to more closely reflect the actual location of existing development and site ownerships;
- revise the diagrammatic employment parcels to more closely reflect the location of proposed development; and
- amend the Green Infrastructure shown to more closely reflect the site's existing vegetation cover and improved landscape strategy.

We also consider that, having identified the suitability of the principal highway access on to the A1307, it ought to indicatively reflect the two points of vehicular access that LDL propose on to the A1307, as identified on S/SHF Site Allocation: Indicative Masterplan (at **Appendix 2**).

Policy J/NE: New employment development proposals

Policy J/NE: New employment developments guides proposals for employment development across the area. Aligned with LDL's representations on Policies S/JH, S/DS and S/SHF, Policy J/NE7 and the supporting information in paragraph 8.19 are considered 'too prescriptive' in terms of national policy (NPPF 2024, paragraph 87b and draft NPPF 2025, E1.1.c.ii and E1.2) and, more importantly, they misinterpret the function and dynamics of the logistics industry.

As phrased, the draft policy limits any warehousing and distribution development above 9,300 sq.m on the basis that this size threshold differentiates between local and regional/national operations. For the reasons discussed below, this is not considered to be an accurate reflection of market realities in Greater Cambridge (or indeed anywhere else), it would potentially result in a distortion to the functioning of the market and is not consistent with the existing and draft NPPF:

1 There is no evidence that large-scale warehousing units above 9,300 sq.m (100,000 sqft) are solely accommodating national or regional needs. In contrast, there are occupiers serving Greater Cambridge that have such requirements, but they are not reflected in either the net absorption data or in the completions rates economic growth scenario, given that existing policy has not allowed for larger units to be developed in the last 15-20 years. The market signals, reflecting enquiries and activity (**Appendix 1**, Table 5.2), as well as stakeholder engagement (through the Council's evidence, namely the GCW&ISN 2025 and the Understanding demand for B8 premises across Greater Cambridge 2021, which is cited within the Council's evidence) highlights the latent demand for larger-scale units in the area. This is also recognised by the Council in the Jobs Topic Paper paragraph 3.42 (see pg.5).

2 In addition, the latest market evidence as presented in **Appendix 1** (paragraphs 5.3.3 to 5.3.5) highlights that there is no direct correlation between the size of units and the type of occupiers or the market being served. A fixed threshold does not determine the type of occupier or the market being served

3 More importantly, there are already a number of both local and national/international companies operating in Greater Cambridge that occupy industrial units above 100,000 sqft. In particular:

a. Hain Daniels (also known as Hain Celestial) occupies 290,000 sqft manufacturing and food processing facility in Histon. This is an US food producer with regional facilities in various locations in the UK, including Henley-upon-Thames, Leeds and the unit in Greater Cambridge, among others. As described in **Appendix 1** (Table 5.1), the site was originally occupied by the Chivers family - i.e., the largest producer in the country (who began jam production in the 1870s). The operations were replaced by Premier Foods, who bought redeveloped the facilities, and then was purchased by Hain Daniels, who continue to produce jam from the site, among other products.

b. Huntsman Advanced Materials, who occupy 250,000+ sqft in Duxford, is a leading global (USA interests) material solutions provider. The Duxford facility's key products and services include epoxy adhesives, methacrylate adhesives, aerospace systems, polyol systems, isocyanate adhesives, epoxy filters distributed across Europe, Africa and Middle East. There are two more facilities in the UK, in Wilton, Redcar and King's Lynn.

c. Hexcel is a leading producer of advanced structural materials, with a significant presence in the UK, particularly at its Duxford site, where they occupy a large unit of over 385,000 sqft split in various subunits. Founded in 1934, Hexcel specialises in carbon fibre reinforcements and resin systems, and is recognised as the world leader in honeycomb manufacturing for the commercial aerospace industry. The Duxford facility manufactures a wide range of products, including prepregs and adhesives, for applications in aerospace, defence, and automotive sectors.

d. Fred Smart Logistics (**Appendix 1**, Table 5.1) currently occupies a 120,000 sqft in Papworth Everard. The company is part of the Frederic Smart & Son Ltd which started as an agricultural products trader locally. The company initially established its presence in Whittlesford in 1919 when it bought a mill and since then it has continued to expand its operations.

e. Cambridge University Press & Assessment (**Appendix 1**, Table 5.1) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use, with about 5% of the floorspace for offices. In particular, the warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.

4 In addition, it is important to highlight that compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich (**Appendix 1**, Section 3.6, pg. 21-22), the presence of larger-scale of industrial units is significantly higher. This highlights that markets need this segment to function appropriately, and emphasises Greater Cambridge market's gap in the stock offer (particularly in the context of existing policy which has effectively stymied the development of larger units).

5 As a result of the policy restriction for the last eight years - since the adoption of South Cambridgeshire LP Policy E/11- there have <u>already been two businesses - namely Marshalls and DHL</u> (**Appendix 1**, paragraphs 5.4.6 to 5.4.8) - <u>that have had to relocate from Greater Cambridge due to a lack of availability of premises of sufficient scale.</u>

6 Continuing to restrict larger units will constrain economic growth by increasing the latent demand for such units or result in businesses relocating and employment being lost locally.

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7 A policy choice to limit provision for regional (and national) occupiers is not consistent with the NPPF. In particular, NPPF paragraphs 86c, 86e and 87b require the necessary levels of flexibility in accommodating specific modern economy - including (inter alia) freight and logistics - needs, recognising the evolving economic circumstances as well as the specific locational requirements for the sector *"at a variety of scales"*. Moreover, the proposed NPPF revisions give additional emphasis to meeting regional economic growth (and weight to the future Spatial Development Strategies in plan-making).

8 The proposed NPPF Policy E1.1.a also sets out a clear alignment between the economic strategic priorities and the Industrial Strategy with the plan-making. The Industrial Strategy emphasises the role of the freight and logistics sector and its part in growing the economy nationally and has stated that a new plan for the sector will be published in due course. It is on this basis that anticipated regional and national priorities for the sector will be further weighted in the near future, making it even more important to consider those needs now as part of emerging plans.

9 Moreover, NPPF paragraph 87b and the proposed NPPF E1.2 aim to allow for flexibility across a variety of scales; the draft NPPF E1.2 in particular states that development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage). The rationale of, effectively, carrying over an outdated legacy policy against the identified needs for larger units is not sound, given the evidence of demand for larger-scale industrial and warehousing units in the area. As aforementioned, both Council's evidence and the latest market evidence (in **Appendix 1**) highlight the undersupply of larger industrial and warehousing units in Greater Cambridge.

10 In addition, the potential consequence of Policy J/NE 7 as phrased, would be to give rise to unmet strategic B8 needs. The Planning Practice Guidance ('PPG') paragraph 031 advises that, where needs for strategic facilities exist, policy-making authorities should collaborate with infrastructure providers and other parties to identify the scale of need across the relevant market, and the authorities will then need to consider the most appropriate locations for meeting these identified needs. The proposed NPPF Policy E2.2 goes further in this regard, by stating that, if market signals demonstrate undersupply of specific types of land or premises, considering the relevant catchment area (which could expand beyond Greater Cambridge's boundaries), or specific locational requirements exist, then, in compliance with the proposed NPPF S5, the development could be permitted. In other words, if the GCLP limits the supply of units above 9,300 sq.m, given that this is a historically constrained market, there is the risk that such units would be promoted outside the provisions of the GCLP - through the development management process – with locally needed employment being paradoxically contrary to the provisions of the development plan. By allowing greater flexibility for the proposed allocations to accommodate some strategic larger-scale needs, if required, the GCLP will be more effectively able to demonstrate that it is aligned with the NPPF.

11 Furthermore, the policy as presently drafted provides limitations in terms of any future proposal's viability, as it constrains market flexibility and future occupiers' choice by limiting options for larger units which, based on market evidence, are subject to high levels of demand.

In summary, the thresholds that limit the size of units in an effort to constrain regional and national activity need to be amended to ensure alignment with the national policy and, more importantly, to serve efficiently the needs of the local market. On this basis, we propose amendments as presented below.

Policy J/NE 7
"7. Large scale warehousing and distribution centres providing for national or regional needs will not be ~~permitted~~ prioritised in Greater Cambridge. The focus is on meeting the identified Greater Cambridge needs for an appropriate range of warehousing and industrial uses and unit sizes."

This wording (or similar) provides flexibility while simultaneously highlighting that the Council aims to utilise better the available industrial and warehousing land by promoting a range of activities across various uses, types, sizes and recognises the importance of the market activity in plan-making.

On a similar basis, the supporting information in paragraph 8.19 needs to be amended as below:

"8.19- Significant additional space for industrial and distribution space has been allocated in the Strategy section of this document responding to identified needs. Proposals for warehouse and distribution centres meeting local needs within or beyond these sites may be supported subject to other policy requirements. However, proposals for large scale warehousing or distribution centres~~, which for the purposes of this policy we define as those premises generally exceeding 9,300 square metres (100,000 square feet) and which serve a wider regional or national function,~~ will not be prioritised as the aim of the policy is to provide for a wide range of uses, types and sizes to meet demand across the local area".

Other Policies

Policy CC/NZ: Net zero carbon new buildings

'Policy CC/NZ: Net zero carbon new buildings' states that *"Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand <u>then supplying all energy demand through onsite energy generation</u>."* [Lichfields emphasis].

LDL notes the requirement to follow a hierarchical approach of reduction heat and power demand, however, raises concerns with flexibility on the subsequent requirement to supply all energy demand through on site energy generation, as there may be some instances where this is not possible and/or an alternative off-site solution may be preferable.

Accordingly, LDL considers the below amendments to the wording should be introduced to allow flexibility, where it can be justified:

"Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand then supplying all energy demand through onsite energy generation, unless, satisfactorily justified otherwise"

Policy BG/TC- Tree Canopy

Part 7 of Policy BG/TC: Improving tree canopy cover and the tree population states that *"Development proposals should maintain a buffer zone of at least 15 metres from the boundary of any ancient* *woodland, ancient and veteran trees, ancient hedgerows and <u>any development boundary</u>, to avoid root damage (known as the root protection area). The size and type of buffer zone will vary depending on the scale, type and impact of the development. All proposals should ensure that appropriately wide buffer strips are possible next to tree groups."* [Lichfields emphasis]

The principle of protecting ancient woodland, ancient and veteran trees, ancient hedgerows is supported through a 15 m buffer zone. However, the inclusion of a 15 m buffer zone from "any development boundary" is unnecessary, as it appears to require a buffer zone from any development boundary, irrespective if there are any *ancient woodland, ancient and veteran trees, ancient hedgerows trees* in this location, or indeed any trees.

LDL therefore proposes this is addressed by the below amendments to Part 7 of Policy BG/TC:

"Development proposals should maintain a buffer zone of at least 15 metres from the boundary of any ancient woodland, ancient and veteran trees, and ancient hedgerows ~~and any development boundary~~, to avoid root damage (known as the root protection area). The size and type of buffer zone will vary depending on the scale, type and impact of the development. All proposals should ensure that appropriately wide buffer strips are possible next to tree groups."

Policy GP/LC: Protection and enhancement of landscape character

Part 1.a. of Policy GP/LC: Protection and enhancement of landscape character states that *"1. All new development proposals must a. protect, conserve and enhance <u>the local landscape character</u> as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents;"* [Lichfields emphasis]

LDL notes that this is inconsistent with Paragraph 187(a and b) of the current NPPF (December 2024) which states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

- *a* *Protecting and enhancing <u>valued landscapes</u>, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *b* *<u>Recognising the intrinsic character and beauty of the countryside</u>, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;"* [Lichfields emphasis]

Firstly, we note that the NPPF para 187a only requires that 'valued landscapes' are protected and enhanced (i.e. not conserved) and this is not the same as 'local landscape character'. For 'local landscape character', NPPF para 187b is most relevant, for which there is a lower policy requirement to *"recognise the intrinsic character and beauty of the countryside"*.

Therefore, in order to be consistent with the adopted NPPF, LDL considers the below amendments to Policy GP/LC:

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"1. All new development proposals must a. ~~protect,~~ conserve ~~and enhance~~ the intrinsic character and beauty of the local landscape ~~character~~, as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents;"

Policy J/AW: Affordable workspace and creative industries

Draft Policy J/AW does not (itself) explicitly require 'affordable workspace'; instead it identifies a detailed specification for affordable workspace, should a future policy require it.

GCLP para 8.44 states that *"The Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. We would welcome feedback on the approach though this consultation."*

LDL does not consider an affordable workspace policy to be necessary or appropriate in the industrial and warehouse sectors, having regard to the economic needs, market demand and signals in these sectors, or indeed for any other reason.

Policy I/SD: Servicing and last-mile deliveries

LDL notes Policy I/SD and endorses limb 4 which requires that *"Proposals for any new industrial and distribution centres that will generate significant freight traffic must provide sufficient facilities for long-term and overnight lorry parking."* The GCLP also considers the general (non-scheme specific) overnight lorry parking need being met by the expansion of the existing facilities at J24 of the A14, as proposed in allocation 'S/RRA/SCS Land to the south of Cambridge Services'. We consider this distinction in the two types of overnight lorry parking to be appropriate.

Concluding Remarks

We trust that our representations assist you to progress the draft GCLP to the Reg19 version. We would be happy to discuss any aspect with you, should that assist.

Yours faithfully

[redacted]

Steven Butterworth
Senior Director
BA (Hons) BPl MRTPI

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

Changes shown by ~~strikethrough~~ (deletes) and <u>underlined</u> (new) red text

What this policy does

3.5.3 *This policy allocates a site on the A14 corridor to help meet the areas need for industrial and logistic space*

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

Vision and Identity

1 *Land North of A1307, Bar Hill (Slate Hall Farm) will be a master-planned employment led development that responds sensitively to the local landscape, and secures access to new green infrastructure for future workers and the local community. It will provide a range of logistics and industrial uses which can support the long-term needs of residents and businesses in Greater Cambridge.*

2 *The site's proximity to Northstowe, Cambridge and nearby villages will provide active travel opportunities for employees and visitors and sustainable last-mile delivery opportunities, as well as providing good access to the strategic road network, critical to support the proposed employment uses.*

3 *The development of the site will be landscape-led, with new buildings set within a mature landscape setting. The protection and enhancement of wildlife habitats will be prioritised alongside the creation of new open spaces for recreational use by workers and local residents. The ~~site's~~ design <u>of the development</u> will respond to its landscape setting in terms of the height, design and placement of buildings.*

Uses

4 *Land North of A1307, Bar Hill (Slate Hall Farm) (site area of 113.3 hectares) is allocated for a major new employment site, as shown on the Policies Map and indicative Spatial Framework. The Development Strategy identifies the site for approximately 24~~2~~0,000 metres square (GIA) of commercial uses, providing a flexible range of ~~small to medium scale~~ appropriate unit sizes that can support a wide range of businesses and that can be adapted to accommodate changing business requirements within the following uses classes*

   a *Class B2 (General Industrial);*

   b *Class B8 (Storage or Distribution) ~~serving local needs~~; and*

   c *Supporting amenities to meet the needs of staff.*

<u>*B2/B8 uses are preferred to meet the identified need and exploit the site's strategic location and size. However, E(g)(i) (Offices), E(g)(ii) (Research & Development) and E(g)(iii) (Light Industrial) uses are*</u>

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also acceptable employment uses, provided these complement the predominant B2/B8 use and collectively comprise a lesser proportion of the employment development floorspace.

The development capacity of the site is to be established though a landscape-led masterplan process.

The development of Land North of A1307, Bar Hill (Slate Hall Farm) ~~must~~ should do the following, unless justified otherwise:

Context

5 *Take a positive approach to managing and mitigating impacts on the surrounding landscape, including long-range views of the site, by:*

- a *retaining and reinforcing existing mature trees and tree belts;*
- b *maximising opportunities to create new landscape areas and corridors, ensuring that new buildings are set within a mature landscape context; and*
- c *preparing and implementing a landscape-led Masterplan for the site, which must be submitted and approved by the Local Planning Authority as part of the first planning application for the site.*

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

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

8 *Prepare appropriate archaeological assessments which consider the extent, character and condition of the archaeological resources and the likely impact of the development on archaeological remains.*

9 *Maintain the usability of the bridleways which run through the site*

Built Form

10 *Take a comprehensive approach to the planning and delivery of the site, including:*

- a *Ensuring the landscape-led Masterplan addresses the whole site, ensuring broad alignment between land in different ownerships; and*
- b *Preparing a site-wide Design Code to ensure a design-led approach to the site which must:*
  - i *address building heights, massing and scale to ensure development proposals fit into their context and respond to and reduce or mitigate impacts on key views and vistas; and*
  - ii *ensuring high-quality design of buildings, including through use of appropriate materials and colour palettes*

11 *Focus built form on the west and central part of the site, with the area to the southeast providing substantial green infrastructure, and water management features along the Oakington Brook.*

Public Space

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

Nature

13 *Prepare and submit, for approval by the Local Planning Authority as part of the first planning application, a site wide biodiversity strategy with an overarching approach to ecology and the environment.*

14 *Protect, positively plan for and deliver dark corridors for bats and other nocturna species particularly within the Oakington Brook corridor, including (but not limited to):*

a *Preparing a site-wide lighting strategy keep lighting to a minimum, which where necessary should be directional and movement sensitive if appropriate*

b *Incorporating appropriately sized buffers around woodlands and along the extent of Oakington Brook, which is an important bat corridor. Buffers must be subject to appropriate positive management to maintain biodiversity value including habitats for water vole and otter populations.*

Movement

15 *Secure active travel and public transport improvements, ensuring sustainable access to the site for workers and local residents, and ensure the site integrates successfully with the highways network by*

a *Providing new and improved active travel infrastructure and a Mobility Hub to maximise sustainable methods of travel to, from and around the site, including from larger settlements such as Cambridge, Northstowe, Bar Hill and Cambourne North, Girton, Histon and Impington;*

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

c *Providing safe and adequate road access to the site from the Strategic Road Network following engagement with the Highways Authority and National Highways, including junction improvements where required*

16 A trip budget based on detailed evidence must be agreed with the Local Highways *Authority prior to planning applications for ~~further~~ development. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.*

17 *The applicant must submit a comprehensive Transport Assessment, Traffic Management Plan and Travel Plan for the whole allocation with the first planning application. The Traffic Management Plan must include a traffic routing plan and arrangements for enforcement.*

18 *To support delivery of the agreed Masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and Local Planning Authority.*

Resources

19 *Develop a comprehensive approach to water management strategy, including appropriate avoidance and mitigation measures to address fluvial and surface water flood risk, and which takes opportunities for betterment by controlling run off from the site to reduce flood risk downstream both to Longstanton Brook and Oakington Brook.*

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

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

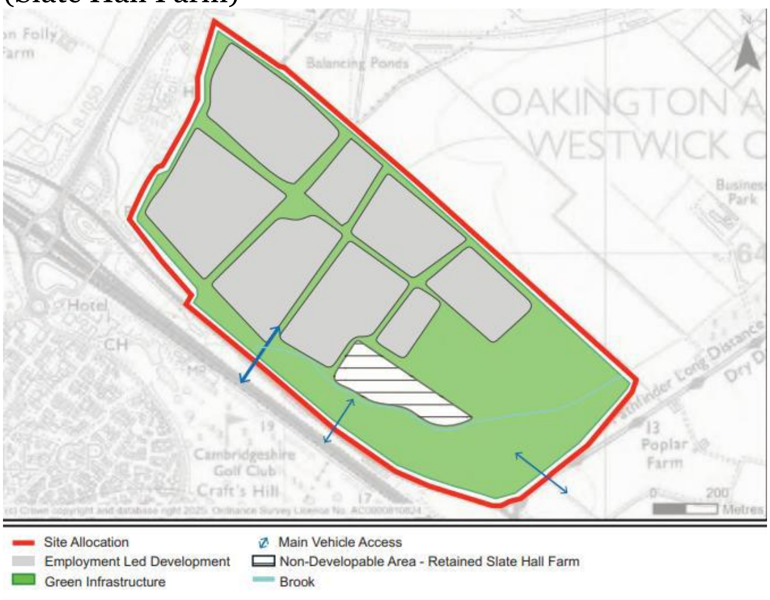
Lifespan

22 *A site-wide spatial Masterplan and Design Code must be submitted for approval by the Local Planning Authority as part of the first application for planning permission. Delivery of the development, including any individual phases, must be in accordance with the phasing plan(s) which must accompany the first planning application. The Masterplan ~~It~~ must demonstrate how comprehensive development of the site will be achieved, including how and when infrastructure required for each phase will be delivered.*

23 *The applicant must also prepare and submit:*

- *a* *A comprehensive environmental management and construction strategy for the first planning application and then for all subsequent phases of development; and*
- *b* *A strategy for the long-term management and maintenance of landscape, drainage and green infrastructure for the first planning application and then for all subsequent phases of development;*

Figure 108: Indicative Spatial Framework for Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



[Amend Figures 106 and 108 as recommended in our Policy S/SHF representation (above)].

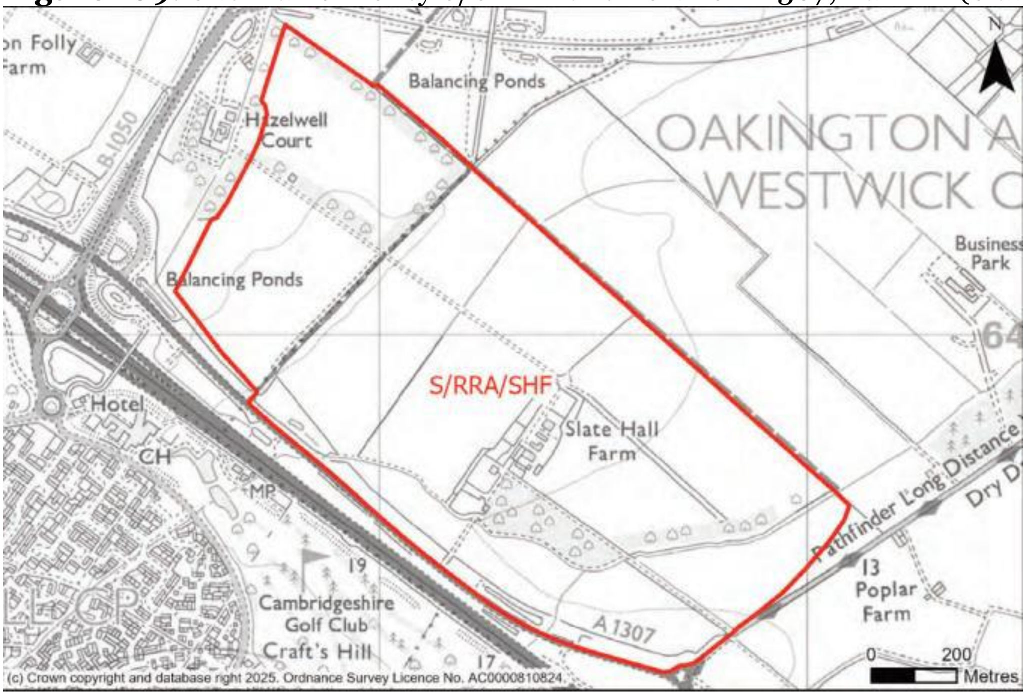
Supporting Information

3.5.4 *This site is allocated for employment uses to meet the demand for local warehousing and logistics, advanced manufacturing and general industrial employment floorspace identified in the studies informing the draft Local Plan.*

3.5.5 *The policy enables a range of ~~small and medium scale~~ commercial uses of an appropriate scale to come forward and it will be important that there is sufficient variety in their form and floorplate size and flexibility in their design to ensure that they cater for a range of different business types and can be adapted over time to meet changing local business needs. As the focus of the site should be on meeting the identified local Greater Cambridge needs, the site should deliver a range of appropriate ~~small and medium sized~~ unit~~s~~ sizes. Development should come forward in phases which respond to local needs.*

3.5.6 *Given the scale and nature of the proposed uses, the policy identifies a positive approach to landscape mitigation, seeking to create an exemplar proposal that is set within a mature landscape. This is to support the health and well-being of those working and visiting the site but also mitigate landscape and long-distance view impacts, existing ecological habitats and species and identified flood risk areas.*

Figure 109: Site Plan of Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)



[No proposed amends.]

3.5.7 *The required mitigation measures also include further Archaeological Assessment, which is required given the archaeological potential in this area. Development is also contingent upon the provision of safe and adequate vehicular access to the public highway,* *the provision of active travel connections to nearby settlements and maximising opportunities to facilitate sustainable last mile deliveries, given the site's location close to Cambridge and several nearby towns and villages.*

3.5.8 *The southeastern part of the site contains the corridor of the Oakington Brook. This provides a flood risk constraint but also an opportunity to manage water effectively and mitigate flood risk downstream. The area is also important for biodiversity mitigation. Development should therefore be restricted to the north western parts of the site.*

Appendix 1

Market Demand Assessment, Savills (January 2026)

Land at Bar Hill

Market Assessment

Date of report: January 2026

PREPARED FOR

LOLWORTH DEVELOPMENTS LTD

savills

Table of Contents

Executive Summary

Introduction

Savills is instructed by Lolworth Developments Limited, a subsidiary of Salhia Real Estate to advise on the market need for proposals for strategic employment development at J25 Bar Hill, Greater Cambridge (the Subject Site).

The Subject Site forms the primary part of the proposed site allocation 'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)' in the draft Greater Cambridge Local Plan for a major employment park. Policy S/DS: Development Strategy identifies this allocation providing approximately 240,000 metres square (GIA) of commercial uses, with a flexible range of unit sizes, within B2 or B8 use.

It is proposed by the draft allocation that units at the Subject Site be limited to 9,300 sq. m . As will be evidenced within this report, this proposed threshold is arbitrary and will serve to continue to supress demand, including from local occupiers seeking to remain within Greater Cambridge, meaning that businesses are forced to locate elsewhere or remain in sub-standard accommodation. This is not efficient and is detrimental to occupiers within the Industrial & Logistics (I&L) sector but also the wider local economy which is reliant on the efficient distribution and storage of goods.

Site Location & Strategic Advantages

The Subject Site's scale, location and accessibility provide the opportunity to flexibly respond to occupier demand for high quality and modern Industrial & Logistics (I&L) floorspace across a range of sizes, giving the ability to serve Greater Cambridge from a highly accessible location, with excellent linkages to labour force, supply chain companies and multi-modal distribution facilities.

Key Sector Trends & Analysis

The I&L sector is the nation's fastest growing sector and a leading driver of productivity growth. To succeed, the UK economy is highly dependent on I&L sector.

Greater Cambridge's I&L sector is highly supply constrained, especially for large units (9,290 sq. m / 100,000 sq. ft) which have a current availability rate of 1.8%. This is significantly suppressing demand and causing rents to unsustainably increase, which is putting pressure on businesses and contributing to the cost of living crisis for households.

Greater Cambridge has about half the I&L floorspace per resident compared to the FEMA. As a driver of I&L floorspace demand in Greater Cambridge, logistics ranks third after manufacturing and professional services. This diverges from trends in the FEMA and nationally where logistics is by far the most significant driver of I&L floorspace demand. Compared to other cities, the proportion of leasing transactions for large units in Greater Cambridge is significantly lower. Greater Cambridge is an outlier.

Greater Cambridge Supply Review

The supply position in relation to I&L land is very constrained in Greater Cambridge overall, and particularly in relation to land which is capable of meeting demand specifically from B2 and B8 occupiers (the majority of the existing and proposed supply being focused on provision of land for Class E use and/or being of a smaller scale thereby restricting the ability to accommodate a full range of occupier demand).

The proposed portfolio of draft allocations contained within the Regulation 18 Greater Cambridge Plan will go some way towards addressing this with the inclusion of the Subject Site (and Land Adjacent to the A14 Services), other proposed sites which include B2/B8 use being of a much smaller scale.

There is currently no allowance for larger units within the proposed supply portfolio which means that local occupiers seeking to expand to larger floorplates are being forced to relocate out of Greater Cambridge, resulting in lost economic benefits and investment.

The Subject Site is the only site within the proposed portfolio that is of a strategic scale and therefore able to cater to a full range of B2 and B8 occupier requirements and to offer continuity of supply over the Plan period. It is important that the unique opportunity offered by the site is maximised and that any future policy allows flexibility to meet a range of demand from B2 and B8 occupiers seeking to serve Greater Cambridge.

Market Demand Assessment

Overall, there is a good level of demand evidenced by current occupier requirements across the full spectrum of size ranges. However, transactions of units of 1,858 sq. m (20,000 sq. ft) and above in Greater Cambridge have been very limited over the last 2 years. This is indicative of a very constrained supply position of suitable units.

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

The evidence shows that in order to meet demand from local occupiers it is essential that a full range of unit sizes can be accommodated without restriction.

Conclusions

- The Subject Site benefits from a number of key strategic advantages which mean it is ideally placed to meet demand from occupiers within the Industrial and Logistics sectors seeking units across a range of size bands.
- Greater Cambridge has a significant undersupply of I&L premises, and particularly larger premises. This is the result of an artificially suppressed supply (via planning policy) and as a consequence Greater Cambridge is out of kilter with comparable locations and failing to meet the needs of the sector (which is vital to support both the local and national economy).
- The supply of land is also very constrained with the Subject Site being a vital and welcome addition to the portfolio of land. It is the only site of strategic scale and it is therefore very important that the opportunity is maximised and a full range of occupier demand can be accommodated.
- A supply of land and buildings at all size ranges, including over 9,300 sq. m, is essential to meet local occupier demand (there are a number of local occupiers within Greater Cambridge within larger units, development of which would not have been permitted in recent years).
- Current live demand cannot be met within Greater Cambridge due to the lack of supply of high quality units or land to meet the needs of occupiers seeking premises across the larger size ranges, but particularly those looking for accommodation of 9,290 sq. m (100,000 sq. ft) plus.
- This is evidenced by a lack of take up, as well as occupiers seeking to locate in alternative areas or remaining in sub-optimal accommodation.

The principle of allocation of the Subject Site is therefore fully supported and it is essential that this enables development of a range of unit sizes, in order to meet market demand.

1. Introduction

1.1 Purpose

1.1.1 Savills is instructed by Lolworth Developments Limited, a subsidiary of Salhia Real Estate to advise on the market need for proposals for strategic employment development at J25 Bar Hill, Greater Cambridge (the Subject Site).

1.1.2 Lolworth Developments Limited is promoting the Subject Site on the north side of the improved Junction 25 of the A14, opposite Bar Hill. The Subject Site forms the primary part of the proposed site allocation 'Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)' in the draft Greater Cambridge Local Plan for a major employment park. Policy S/DS: Development Strategy identifies this allocation providing approximately 240,000 metres square (GIA) of commercial uses, with a flexible range of unit sizes, within B2 or B8 use.

1.1.3 The Subject Site extends to c. 100 ha gross and indicative proposals are for employment uses falling within E(g), B2 and B8 Class. Based on the excellent accessibility and locational credentials of the site, including its proximity to Cambridge city, the Subject Site will be attractive to a wide range of occupiers and will make a vital contribution to the currently extremely limited portfolio of employment land within Greater Cambridge which cannot currently meet local demand across a full spectrum of occupier requirements (something which has been the case for some time).

1.1.4 It is proposed by the draft allocation that units at the Subject Site be limited to 9,300 sq. m . As will be evidenced within this report, this proposed threshold is arbitrary and will serve to continue to supress demand, including from local occupiers seeking to remain within Greater Cambridge, meaning that businesses are forced to locate elsewhere or remain in sub-standard accommodation. This is not efficient and is detrimental to occupiers within the I&L sector but also the wider local economy which is reliant on the efficient distribution and storage of goods.

1.2 Report Structure

1.2.1 The remainder of this report is structured as follows:

- The location and strategic advantages of the Subject Site are set out at Section 2;
- National and local key sector trends and indicators are reviewed at Section 3;
- Review and analysis of the supply of I&L land within Greater Cambridge is included at Section 4;
- An assessment of market demand is undertaken at Section 5, including review of occupier requirements and take-up; and
- Conclusions are set out at Section 6.

1.3 Reader Note

1.3.1 When we refer to the I&L sector we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class), and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices), and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

2. Subject Site Strategic Advantages

2.1 Summary

2.1.1 The Subject Site's scale, location and accessibility provide the opportunity to flexibly respond to occupier demand for high quality and modern Industrial & Logistics (I&L) floorspace across a range of sizes, in a location which gives the ability to serve Greater Cambridge from a highly accessible location, with excellent linkages to labour force, supply chain companies and multi-modal distribution facilities.

2.2 Subject Site Location

2.2.1 The Subject Site extends to approximately 100 ha, and is located to the north west of Cambridge, within the administrative boundary of South Cambridgeshire (please see **Figure 2.1** below). The scale, location and accessibility of the site offer a number of strategic advantages for occupiers within the I&L sectors and these are considered in more detail within this section.

Figure 2.1 Subject Site Location

Source: Promap/Savills, 2026

2.3 Location & Accessibility

2.3.1 Accessibility and excellent road linkages are a vital consideration for I&L occupiers, ensuring efficient and cost effective business operation.

2.3.2 The Subject Site has direct access to Junction 25 of the A14, providing links between Felixstowe and Harwich ports on the eastern cost and the Midlands, as well as providing excellent access into Cambridge within around 20 minutes' drive. The M11 links directly with the A14 to the south giving access to the M25 and London.

2.3.3 The A14 was recently upgraded through the national Road Investment Strategy (RIS) programme. The £1.5 billion scheme to improve the A14 seeks to support national economic growth by improving a strategically important freight route, improving access to labour markets and eliminating traffic delays. The Subject Site is perfectly positioned to benefit from the RIS investment.

2.4 Access to Markets (customers)

2.4.1 The excellent accessibility to key movement corridors is highly advantageous for I&L occupiers and logistics companies to deliver goods to Greater Cambridge. It reduces transportation time, costs, and carbon emissions.

2.4.2 Notably, the Subject Site's location represents an excellent opportunity for 'last-mile' logistics development to serve Greater Cambridge as part of its development profile. The provision of 'last-mile' logistics facilities on the edge of the urban area allows for more sustainable travel and servicing patterns by reducing the need for long-distance freight and supporting shorter, more efficient local supply chains. The Subject Site's highly accessible location means that traffic will be restricted to dedicated high-traffic corridors (i.e. the A14).

2.5 Access to Supply Chain

2.5.1 The Subject Site's excellent linkages give businesses a high degree of accessibility to suppliers across the region and country, as well as end customers in Greater Cambridge and beyond.

2.5.2 Most I&L occupiers have linkages with suppliers located within a catchment of between 1 to 4 hours travel time. There is no fixed catchment but the shorter travel time is more typical of companies serving a predominantly local catchment. Companies which operate at a national scale will generally have the widest supply chain.

2.5.3 It is important to note that business supply chains do not follow local authority boundaries and are driven by specific business operational models. Flexibility provided by good transport linkages such as can be delivered here, is advantageous to enable businesses to adapt to new models as required.

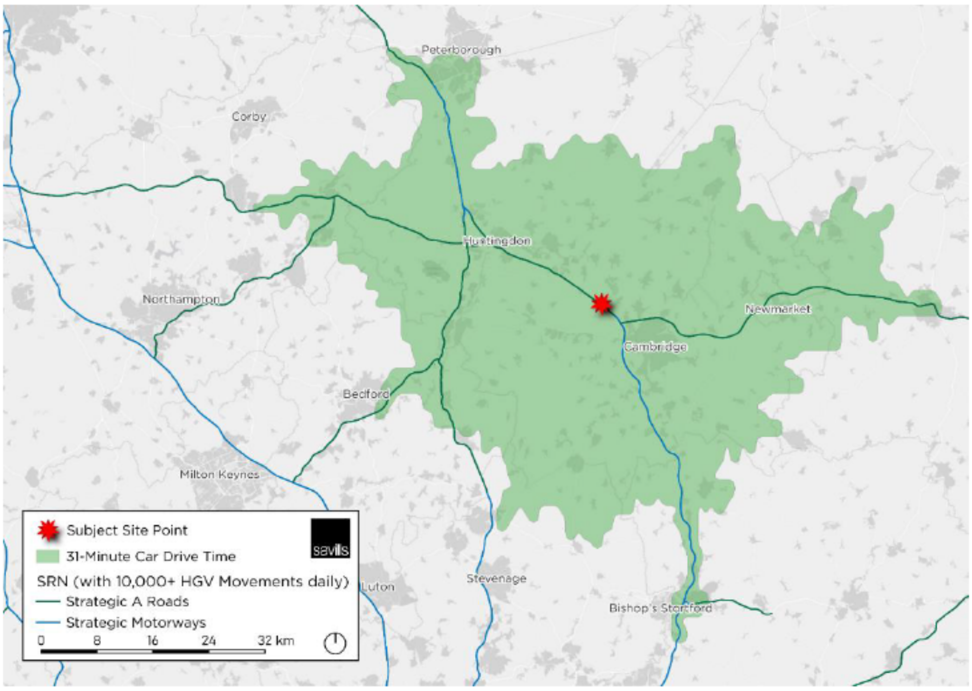
2.6 Access to labour supply

2.6.1 As a consequence of the Subject Site's location and accessibility, it offers excellent access to labour supply, which is also a key consideration of businesses when making locational decisions.

2.6.2 We consider a 31-minute car drive time to be an appropriate core catchment for accessing labour from the Subject Site (Figure **2.2**). This is the average home-to-work travel time for residents of South Cambridgeshire. Within this catchment, approximately 558,000 working-age people are reachable, representing a high level of workforce accessibility and a considerable labour pool for future businesses located at the Subject Site to draw from.

2.6.3 Importantly, a proposed employment development at the Subject Site would generate new job opportunities for local residents as well as increase the level of self-containment within South Cambridgeshire.

Figure 2.2 Access to Labour Market



Source: Savills (2025)

2.7 Linkages to Major Freight Handling Infrastructure

2.7.1 The Subject Site's road accessibility means it can link to freight handling infrastructure as part of its supply chains. This provides flexibility for occupiers to adapt their business models and uitlise multi-modal methods of distribution as required. This is something which is increasingly important to occupiers within the I&L sector.

2.7.2 **Table 2.1** below lists the various freight handling infrastructure within a 45-minute and 2-hour truck time catchment of the Subject Site.

Table 2.1 Freight Infrastructure within 45-Minute and 2-Hour Truck Time Catchments

Geography	Within 45-Minute Truck Drive Time	Within 2-Hour Truck Drive Time
Rail Freight	Ely (Potter Distribution Depot)	Tilbury; London Gateway; Felixstowe; Barking; DIRFT; Hams Hall; Lawley Street; Birch Coppice; Castle Donnington; East Midlands Gateway; Doncaster; Wakefield Europort; Folkestone; Harwich/ Bathside Bay; Purfleet; Rotherham; Rugby; TIRFP (Telford); Wembley (EFOC)
Airports	Stansted Airport	Heathrow; Stansted; East Midlands; Coventry Airport; Gatwick; Birmingham; London Luton Airport

Geography	Within 45-Minute Truck Drive Time	Within 2-Hour Truck Drive Time
Ports		Boston; Chatham; Dover; Felixstowe; Goole; Harwich; Ipswich; London; Tilbury; London Gateway; Purfleet

2.8 Strategic scale

2.8.1 The strategic scale and unconstrained nature of the Subject Site (i.e. outside the urban area and not within the Green Belt) means that it will be possible to respond flexibly to occupier demand to ensure that occupiers seeking to serve Greater Cambridge from a range of unit sizes can be accommodated. Supporting a full range of business needs is key to ensuring that economic benefits are delivered and maximised.

2.8.2 The scale of the Subject Site also ensures continuity of supply over the Plan period. Given the often considerable length of time that it takes for sites of strategic scale to progress fully through the planning pipeline to the point of unit delivery, this ability to deliver space early and then on a continuing basis is particularly important to support the local economy, giving confidence to investors and businesses over the longer term.

3. Key Sector Trends

3.1 Summary

3.1.1 This Section evidences the following:

- The Industrial & Logistics (I&L) sector is the nation's fastest growing sector and a leading driver of productivity growth;
- The I&L sector's inputs into the UK's key growth sectors comprise 22% of total inputs. To succeed, the UK economy is highly dependent on I&L sector;
- Greater Cambridge's I&L sector is supply constrained, especially for large units which has a current availability rate of 1.8%;
- The supply constraints in Greater Cambridge are significantly suppressing demand;
- The supply constraints are causing rents to unsustainably increase which is putting pressure on businesses and contributing to the cost of living crisis for households;
- Greater Cambridge has about half the I&L floorspace per resident compared to the FEMA;
- As a driver of I&L floorspace demand in Greater Cambridge, logistics ranks third after manufacturing and professional services. This diverges from trends in the FEMA and nationally where logistics is by far the most significant driver of I&L floorspace demand; and
- Compared to other cities, the proportion of leasing transactions for large units in Greater Cambridge is significantly lower. Greater Cambridge is an outlier.

3.1.2 Overall, there is a high level of unmet demand for I&L premises in Greater Cambridge and particularly for large I&L premises (greater than 9,290 sq. m). It is essential that this shortage of premises is addressed in order to support local economic growth. The Subject Site is ideally placed to help to meet this need and, as will be considered in the following Section, offers a unique opportunity to do so.

3.2 Approach

3.2.1 This section reviews the role of the I&L sector in both the national economy and Greater Cambridge. It demonstrates how large units play a critical role in local economies. In fact, local demand for I&L premises is unable to be met without the provision of large units.

3.2.2 Savills analysis compares the role of logistics in Greater Cambridge with comparable cities. It shows how Greater Cambridge is an outlier in this regard and that its planning policies are suppressing demand for I&L premises.

3.3 National I&L Growth Trends

3.3.1 We have provide a detailed summary of national I&L growth trends in **Appendix A**. Key points are set out below:

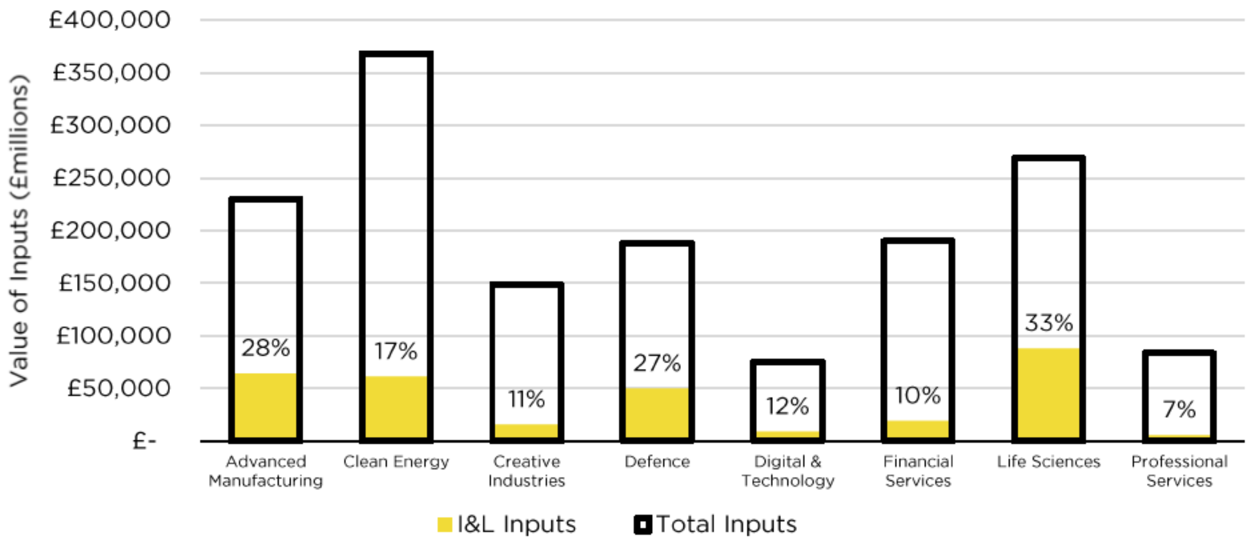
- **It is a leading driver of productivity gains to the national economy;**
- **It is the economy's fastest growing sector;**
- **The need for I&L premises continues to increase due to the rise of e-commerce, growing global freight flows, and the imperative of improving supply chain resilience;**
- **I&L premises are now considered critical national infrastructure that support the functioning of the economy and the way we live our lives;**

- **The sector remains supply-constrained nationally;**
- **Jobs in the sector are well-paid and high-quality; and**
- **Its impact extends well beyond onsite, warehouse-related jobs.**

3.3.2 The Government's Industrial Strategy recognises the sector's vital contribution to the competitiveness of its eight identified growth sectors (referred to as the IS-8) which are presented in **Figure 3.1**. The IS-8 are underpinned, to varying degrees, by I&L. This can be directly via the provision of physical premises or indirectly via the transport of physical goods and data to end customers.

3.3.3 Savills has analysed the Input-Output Analytical Tables produced by the Office for National Statistics (ONS) which shows how different industries economically engage with each other through the exchange of goods and services. **Figure 3.1** shows that the combined IS-8 sectors purchased £250 billion worth of inputs from the I&L sector, which is equivalent to 22% of their overall inputs.

Figure 3.1 I&L is a Vital Input to the IS-8 Sectors



3.4 Market Indicators for Greater Cambridge's I&L Sector

Defining a Property Market Area

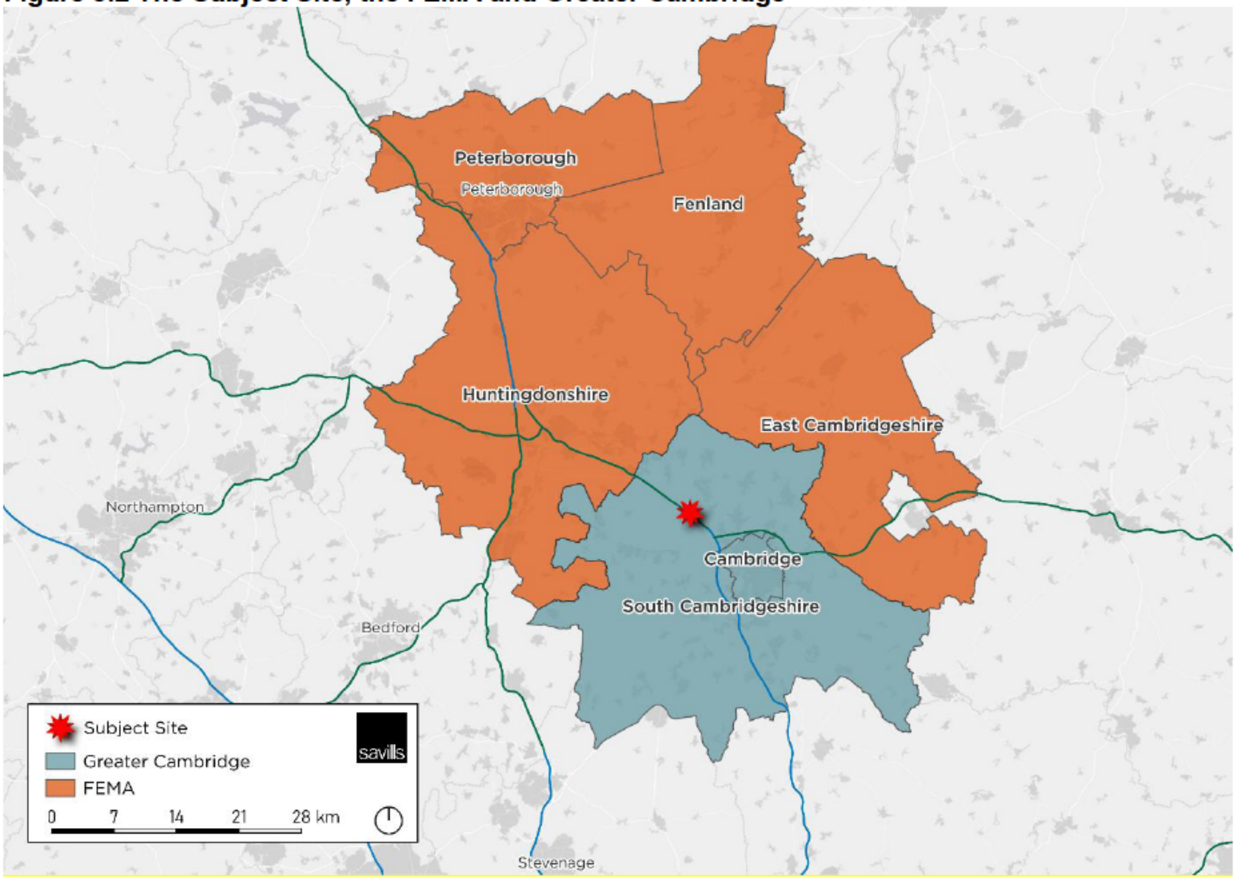
3.4.1 Before we consider the strength of the I&L market in Greater Cambridge, it is necessary to identify an appropriate Property Market Area ('PMA') relevant to the Subject Site. This is the geography within which we will consider market supply and demand factors.

3.4.2 To identify an appropriate PMA, we first consider South Cambridgeshire's employment evidence to see if the Council has defined a Functional Economic Market Area ('FEMA'). A FEMA is a collection of administrative areas which share economic linkages as defined by travel to work patterns, housing market areas, shared infrastructure, labour skills, etc. Where possible, we look to use the Council defined FEMA as a proxy for the PMA for I&L uses.

3.4.3 The South Cambridgeshire Local Plan (2018) is supported by the Employment Land Review Update and Review of Selective Management of Employment Polices (July 2012). The document does not explicitly reference a FEMA and uses the Greater Cambridge geography.

3.4.4 A new Greater Cambridge Local Plan is being prepared. The Greater Cambridge Employment and Economic Needs Study (2020) is a key evidence base document that supports the plan making process. It identifies the FEMA as comprising six local authorities: Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council and South Cambridgeshire District Council. A FEMA is a collection of administrative areas which share economic linkages including travel-to-work patterns, housing market areas, shared infrastructure, and labour skills. Where possible, we use a council-defined FEMA as a proxy for the PMA for I&L uses. We therefore consider the FEMA to be the appropriate geography for assessing I&L uses. We have also assessed the Greater Cambridge geography given its relevance to the review of the local plan. These geographies are shown in **Figure 3.2**.

Figure 3.2 The Subject Site, the FEMA and Greater Cambridge



Source: Savills, 2025

Market Supply & Demand Indicators

3.4.5 The consideration of market signals is a key requirement of the NPPF (Paragraph 32) to underpin the preparation and review of all Local Plan policies.

3.4.6 **Table 3.1** summarises the key market supply and demand indicators for South Cambridgeshire and the FEMA in 2025.

3.4.7 Greater Cambridge currently has 1,037,600 sq.m of I&L floorspace. This equates to 16% of the FEMA's total I&L stock.

3.4.8 The availability rate in Greater Cambridge was 4.5%, which was lower than the wider FEMA's availability rate (5.4%). Over the period 2012 to 2024, the average availability rate in Greater Cambridge was 7.6%. Almost all geographies have current rates of availability below their longer term average (2012-2024).

Table 3.1 Summary of Key Market Supply Indicators

	Inventory (2025 YTD) (sq.m)	Current Availability Rate (2025 YTD)	Average Availability Rate (2012-2024)
South Cambridgeshire	730,000	4.2%	8.0%
Cambridge City	308,000	5.2%	6.0%
Greater Cambridge	**1,038,000**	**4.5%**	**7.6%**
East Cambridgeshire	**444,000**	**8.1%**	**4.9%**
Fenland	**1,691,000**	**1.1%**	**5.1%**
Huntingdonshire	**1,691,000**	**4.9%**	**5.8%**
Peterborough	**2,255,000**	**7.6%**	**6.0%**
FEMA	**6,416,000**	**5.4%**	**6.0%**

Source: CoStar, Savills, 2025. NB: Figures may not sum due to rounding

3.4.9 **Table 3.2** presents inventory by size band and the availability rate in Greater Cambridge through to 2026 Year To Date. The overall availability rate is currently 6.5%. However, the availability rate of large units is only 1.8%

Table 3.2 Summary of Key Market Supply & Demand Indicators

	Inventory (2026 YTD) (sq.m)	Current Availability Rate (2026 YTD)
Small (up to 2,787 sq.m)	429,000	8.5%
Medium (2,787 sq.m to 9,290 sq.m)	383,000	8.9%
Large (greater than 9,290 sq.m)	401,238	1.8%
Total	**1,204,000**	**6.5%**

Source: CoStar, Savills, 2025. NB: Figures may not sum due to rounding

Greater Cambridge is Supply Constrained

3.4.10 At the national level, 8.0% availability across all size bands is commonly referred to as the level where a market is broadly in balance (i.e. equilibrium frictional capacity) in terms of supply and demand, as sourced in publications such as the:

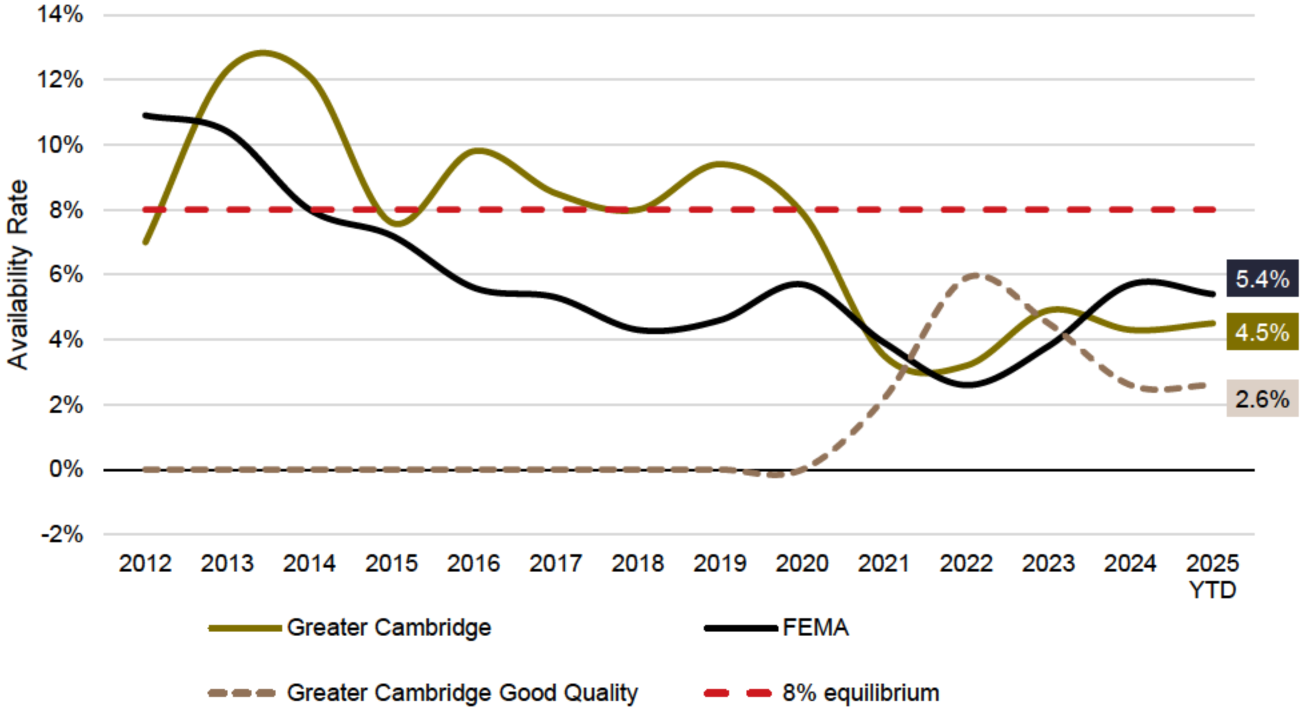
- GLA's Land for Industry and Transport Supplementary Planning Guidance ('SPG') (2012);
- London Plan (2021); and
- British Property Federation's ('BPF') '*Levelling Up – The Logic of Logistics*' Report.

3.4.11 Below this level available supply becomes tight and rents increase as strong occupier demand compete for limited available stock.

3.4.12 As shown in **Figure 3.3**, availability in Greater Cambridge has been below the 8.0% equilibrium since 2020 and it has been below this level since 2014 in the wider FEMA. This indicates that the I&L market has been supply-constrained for a considerable period which in turn supresses demand because not all occupiers are able to find space to meet their needs. As a result, they are either forced to remain in their existing premises, even if not ideal for their operational requirements, or leave the area to find suitable premises elsewhere, taking jobs and investment.

3.4.13 The availability of good quality[1] buildings has also been below the 8% equilibrium in Greater Cambridge. Until 2020, good quality I&L stock had 0% availability. Since 2021, there has been a slight increase and it is currently just 2.6%. This is well below the 8% equilibrium.

Figure 3.3 I&L Availability in Greater Cambridge and the FEMA (2014-2025 YTD)



Source: CoStar, Savills 2025

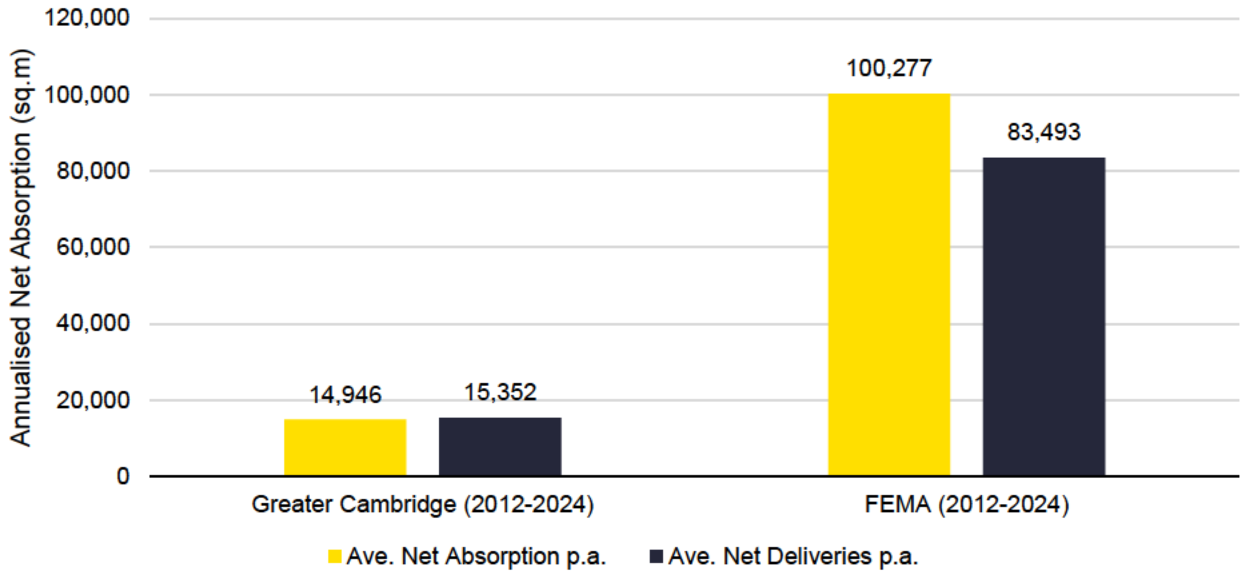
Greater Cambridge's Supply Constraints are Suppressing Demand

3.4.14 Net absorption is a leading measure of demand based on lease deals. It compares occupied space (move-ins) versus vacated space (move-outs). On the other hand, net deliveries is a measure of supply and registers the change in inventory (floorspace) related primarily to new developments.

[1] *We use CoStar's building quality rating system. A rating of 4 and 5 stars equates to good quality; a 3-star rating equates to average quality; and 1 and 2-star rating equates to poor quality. CoStar is a leading provider of commercial property data.*

3.4.15 **Figure 3.4** shows that over the past 13 years (2012-2024) in the FEMA, average levels of net absorption (demand) have exceeded the average levels of net deliveries (supply) of I&L floorspace. Across the FEMA, demand has exceeded supply by 20% over the period 2012 to 2024. In Greater Cambridge, the market's highly constrained state with few new deliveries has held back net absorption. The level of market activity in Greater Cambridge is unusually low and this is a clear indication of market demand being suppressed as a result of a lack of suitable, available I&L premises. The element of the market being most suppressed is the large unit sector as already indicated by its availability rate of 1.8% shown in Table 3.2. The analysis below is additional evidence that leasing activity in this part of the market diverges from the FEMAX.

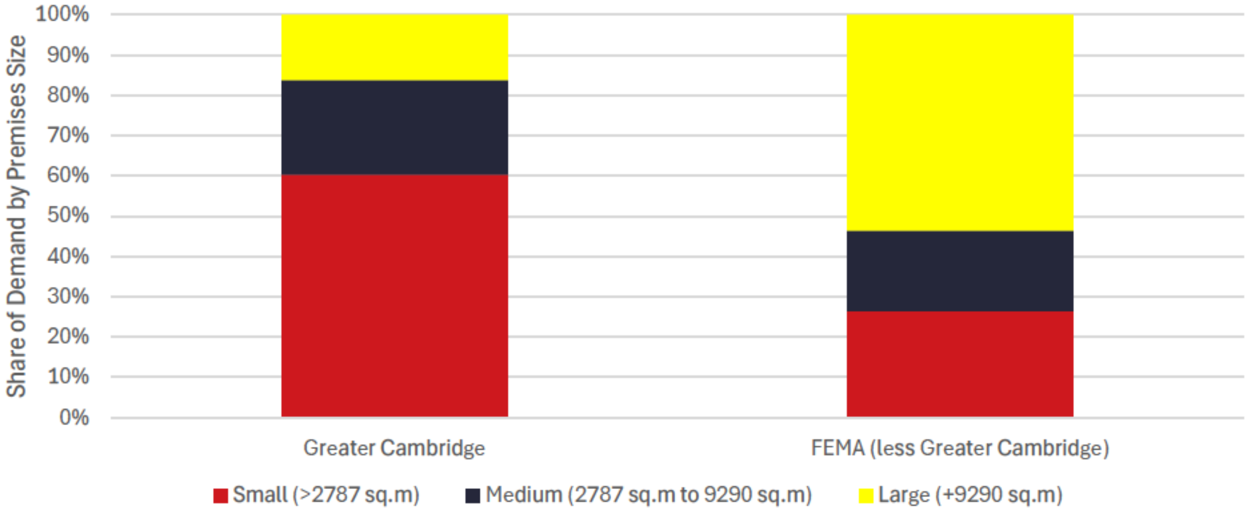
Figure 3.4 Average Net Absorption Vs. Average Net Deliveries p.a. (2012-2024)



Source: CoStar, Savills 2025

3.4.16 **Figure 3.5** shows that Greater Cambridge has a very low 16% of lettings over the past 10 years that are for large premises (greater than 9290 sq. m or 100,000 sq. ft). This low proportion is largely due to the restrictive planning policy. By way of illustration of this point, in the FEMA, the proportion of lettings for large premises is more than three times that of Greater Cambridge at about 54%. This is more typical of national trends and highlights the distortions in the Greater Cambridge I&L market.

Figure 3.5 Demand by Premises Size



Source: CoStar, Savills 2025

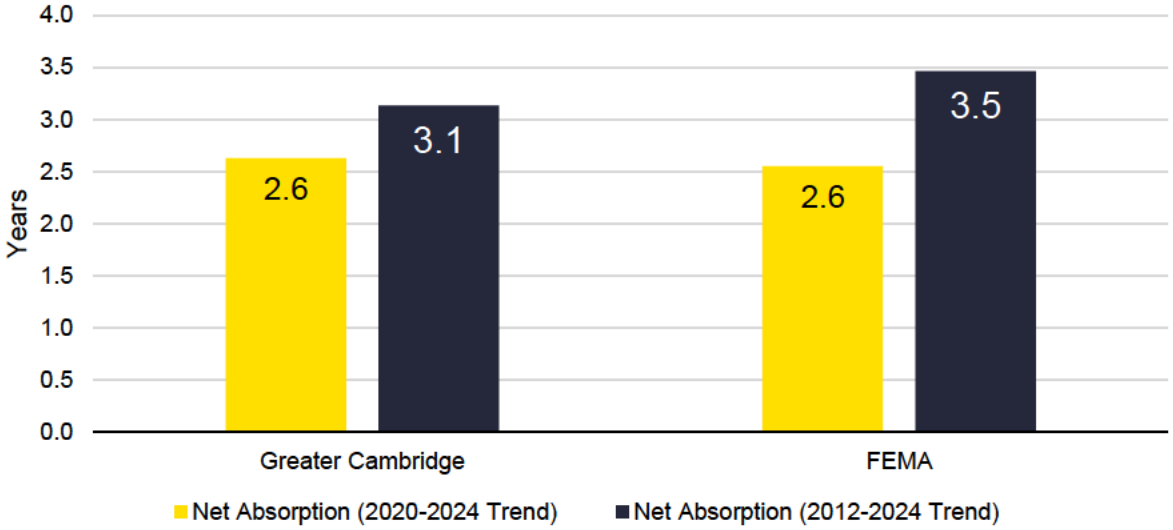
Greater Cambridge Has Limited Supply, Especially for Good Quality Stock

3.4.17 That Greater Cambridge and the FEMA are supply constrained is further illustrated by assessing the current years of supply, which is how many years of available floorspace is available to meet anticipated levels of demand (net absorption[2]).

3.4.18 As shown in **Figure 3.6**, when using the historic long-term 2012 to 2024 trend for demand (net absorption), Greater Cambridge has 3.1 years of supply available, whilst the FEMA has 3.5 years. When limiting the analysis to more recent performance of net absorption (2020-2024), the years of available supply drops to 2.6 years for both geographies. Given Greater Cambridge's constraints and the low level of take-up, these figures mask the limited alternatives that occupiers in Greater Cambridge have.

[2] Net absorption is a leading measure of floorspace demand (move-ins minus move-outs).

Figure 3.6 Years of Immediate Available I&L Supply Stock in Greater Cambridge and FEMA



Source: CoStar, Savills 2025.

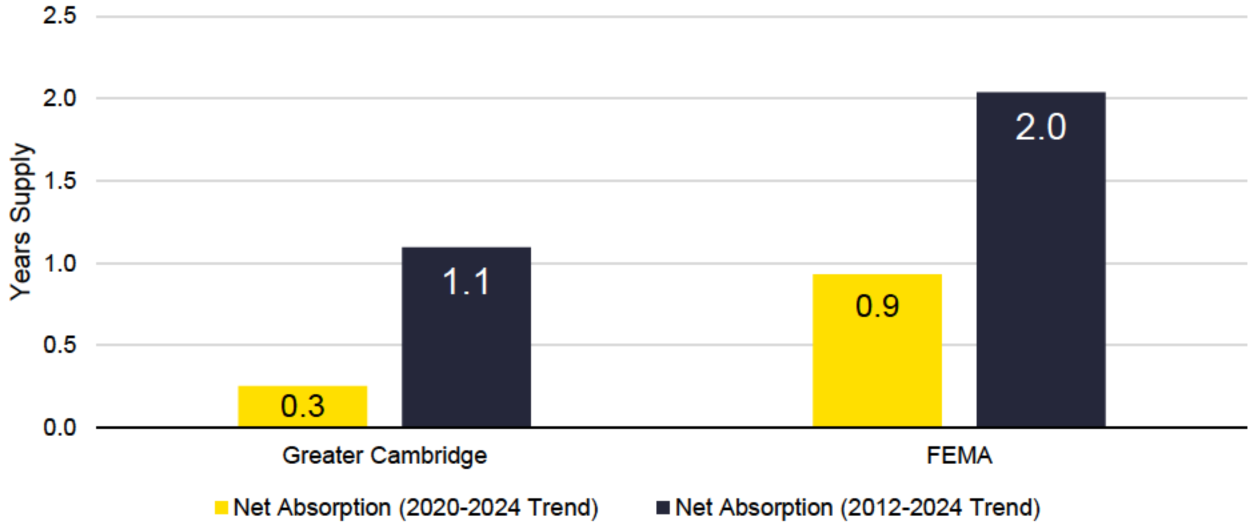
3.4.19 The supply situation becomes more critical when considering the availability of floorspace of good quality. This further analysis is critical because occupiers increasingly demand better quality buildings with Environmental, Social and Governance ('ESG') features given the increasing costs associated with running warehouses. This is evidenced in the Savills European Real Estate Logistics Census (2024) where the most cited issue was 'more stringent ESG targets/regulations' which was considered important or very important by 69% of occupiers[3].

3.4.20 An understanding of the current market can be drawn from comparing the historic trend of net absorption (a proxy for demand) against the currently available I&L floorspace. Dividing the historic average net absorption by the currently available floorspace results in a high-level estimate of how much I&L is available immediately, based on historic trends.

3.4.21 **Figure 3.7** shows there is only 0.3 years of supply of good quality I&L stock in Greater Cambridge when using a more recent historic net absorption trend of five years (2020-2024). It is only 1.1 years following the longer historic period of 2012-2024. This indicates that there is an immediate need for good quality stock which meets modern occupier requirements.

[3] Spotlight: European Real Estate Logistics Census Autumn 2024 (Savills, 2024). Available at: https://www.savills.co.uk/research_articles/229130/366049-0#esg

Figure 3.7 Years of Immediately Available Supply for Good Quality I&L in Greater Cambridge and the FEMA



Source: CoStar, Savills 2025.

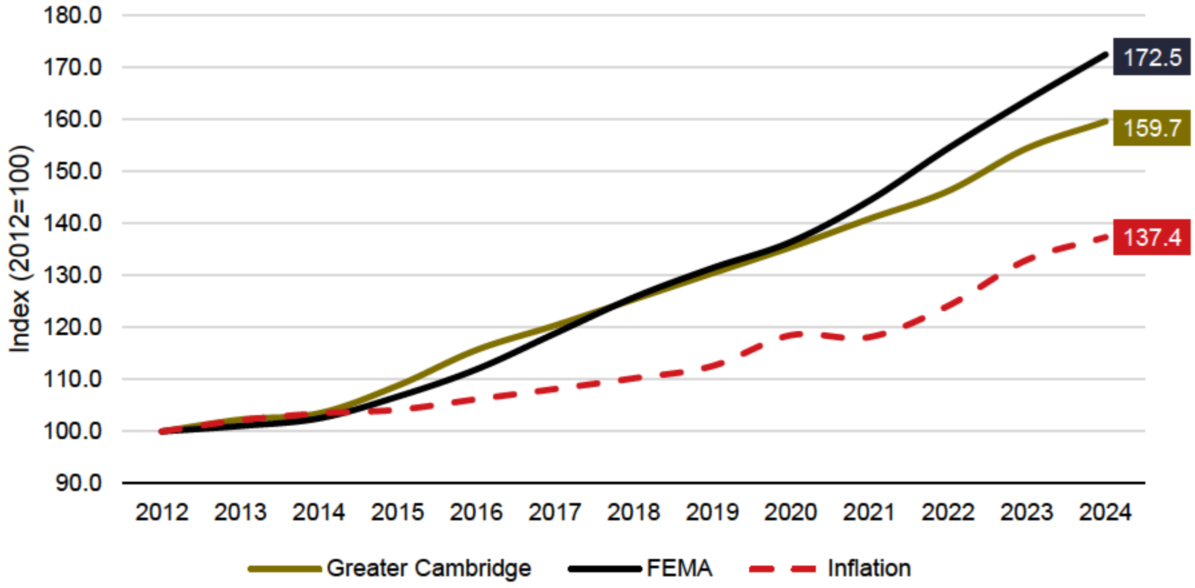
Greater Cambridge's Supply Constraints Impact Local Occupiers and Residents

3.4.22 Another key market indicator for understanding the relationship between supply and demand is rental growth. When demand exceeds supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand, rental growth is lower, typically tracking inflation more closely.

3.4.23 Across Greater Cambridge and the wider FEMA, rents have grown above the rate of inflation. This corroborates the availability analysis in **Figure 3.3**, namely that Greater Cambridge and the wider FEMA have both been supply constrained, with their respective availability rates being below the 8.0% equilibrium for the last decade.

3.4.24 **Figure 3.8** below shows that between 2012 and 2024, rents have grown by almost 60% in Greater Cambridge, and 73% in the wider FEMA. This is significantly greater than the rate of inflation. The increase in rents impacts existing occupiers, especially smaller companies, whose profit margins are already under pressure. It also impacts the local cost of living as it is more expensive to deliver goods and services to local residents. In other words, it is a contributor to the cost of living crisis.

Figure 3.8 I&L Rental Growth Vs. Inflation (2014-2024)



Source: CoStar, Savills 2025

3.4.25 There is momentum behind the strong rental growth as it has been stronger in recent years (2020 to 2024) than in the previous period (2014 to 2019). **Table 3.3** shows that rental growth has been stronger between 2020 and 2024 compared to the preceding 5 year period (2014-2019) in both Greater Cambridge and the FEMA. This indicates that the market's supply-constrained state maybe be causing rental growth to accelerate.

Table 3.3 Annual Rental Growth (2014-2024)

	Average Year-on-Year Growth (2014-2019)	Average Year-on-Year Growth (2020-2024)
Greater Cambridge	6.1%	7.3%
FEMA	5.8%	7.0%

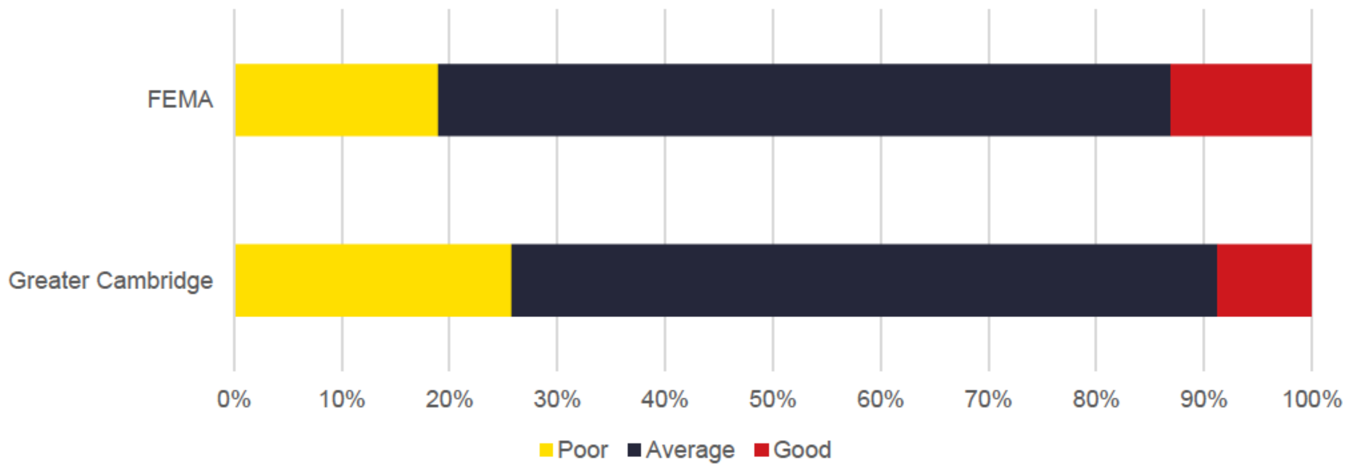
Source: CoStar, Savills 2025

Greater Cambridge Lacks Good Quality I&L Stock

3.4.26 As discussed above, due to the increasing operational costs of warehouses, occupiers are gravitating towards better quality buildings with Environmental, Social and Governance (ESG) features. As a result, demand is strong for buildings that achieve high BREEAM (Building Research Establishment Environmental Assessment Methodology) and EPC (Energy Performance Certificate) ratings. These properties are given a CoStar quality rating of 4 or 5 stars. Properties that don't meet these standards are given either a 3-star rating (average quality) or a 1 or 2-star rating (below average quality).

3.4.27 **Figure 3.9** compares the quality of I&L stock by CoStar rating for Greater Cambridge and the FEMA. It shows that 91% of Greater Cambridge's I&L inventory is either of poor or average quality. Greater Cambridge has only 9% of stock of good quality which is significantly below the FEMA. This indicates that existing I&L premises in Greater Cambridge should be refurbished or redeveloped, and that new high quality premises are needed to meet the requirements of modern occupiers.

Figure 3.9 Quality of I&L Stock in Greater Cambridge, FEMA, East of England, and England



Source: CoStar, Savills 2025

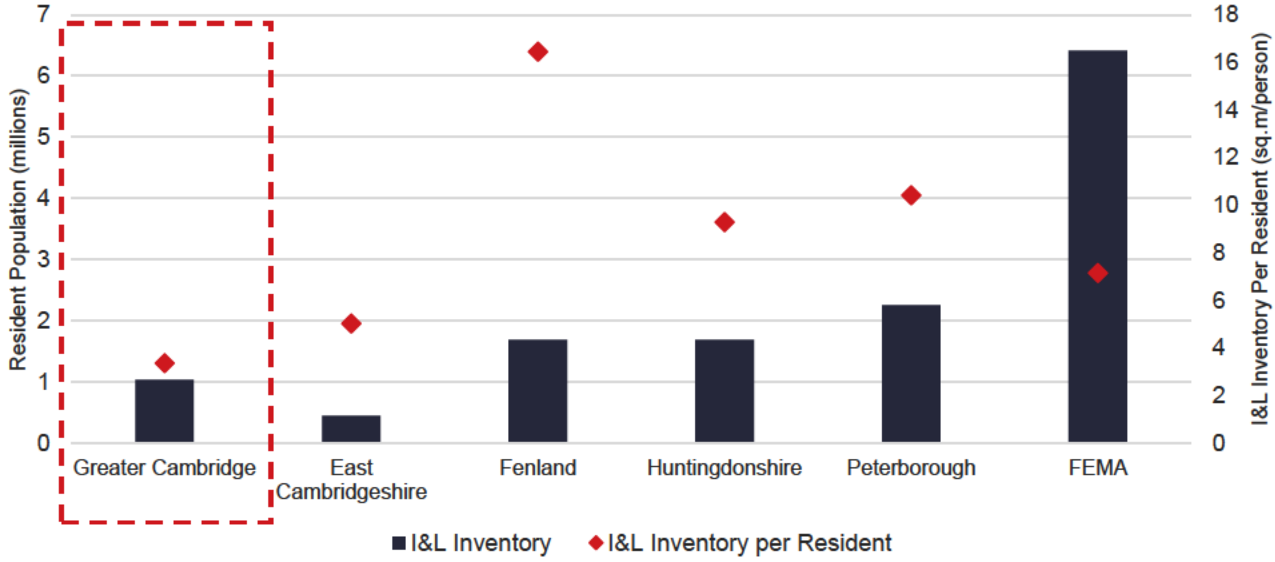
Greater Cambridge Has Less Than Half the I&L Floorspace Per Resident as FEMA

3.4.28 An important consideration when assessing I&L supply is the amount of I&L floorspace per resident. This reflects the extent to which I&L premises shape and support our lives and work. I&L is the foundation upon which much of the economy is built[4]. Without the production, storage, and distribution of goods and services, the economy cannot function. Equally, well-located I&L development enables occupiers to meet end-users' needs in an efficient manner (both economically and environmentally). Optimal locations ensure that supply-chains and networks are able to reduce and optimise journey times.

3.4.29 The I&L floorspace per resident in Greater Cambridge and the other local authorities in the wider FEMA are presented in **Figure 3.10**. In Greater Cambridge, there is only 3.4 sq. m of I&L floorspace per resident. Within the wider FEMA, the average is 7.2 sq. m per resident. Greater Cambridge has less than half the level of the wider FEMA.

[4] Savills (2022). Levelling Up – the logic of logistics. Available at: *www.savills.co.uk/research_articles/229130/326244-0*

Figure 3.10 Share of Floorspace Leased by Sector (2014-2024)



Source: CoStar, Savills 2025

3.5 Role of Logistics in the Greater Cambridge Economy

3.5.1 Cambridge's economy increasingly relies on diverse support services and supply chains (including advanced manufacturing, R&D activities, and logistics) that require access to well-located, modern I&L floorspace . These uses are essential for the efficient operation of the city's knowledge-based economy but are displaced by competing land uses, particularly residential and office development, within the urban area and fringe sites.

3.5.2 To better understand demand for I&L premises and the role of logistics in the local economy, we assess lease transactions in Greater Cambridge and the FEMA over the past decade.

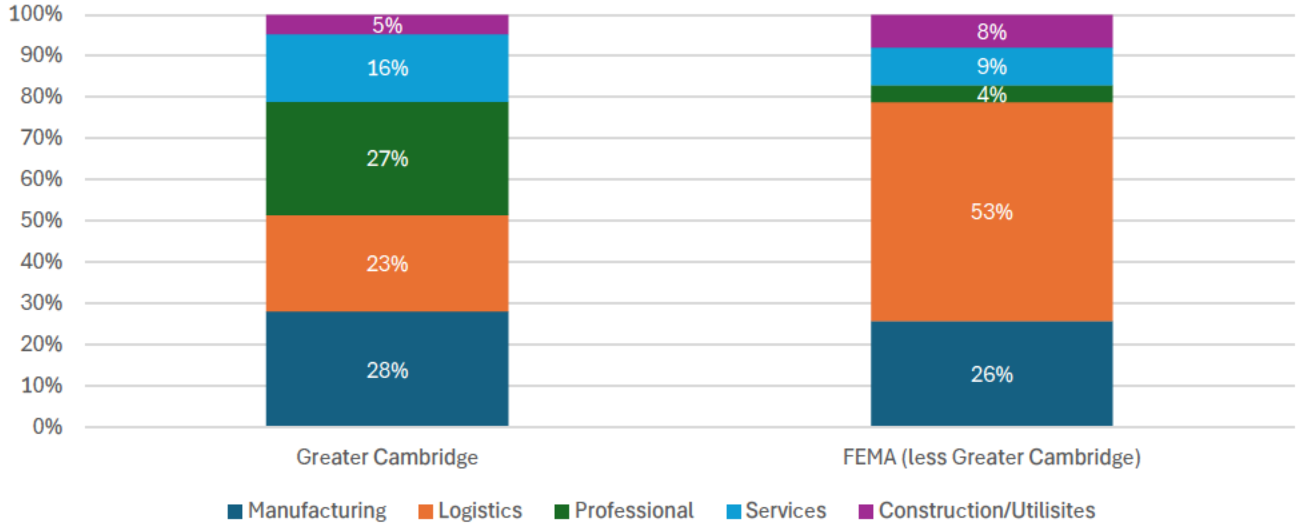
3.5.3 Within the FEMA, the logistics sector has been the most prominent driver of demand, followed by manufacturing, services and construction. This is consistent with national trends.

3.5.4 However, when comparing leasing in Greater Cambridge with the rest of the FEMA, **Figure 3.11** shows that the logistics sector ranks third in leasing activity, comprising 23% of total leasing activity in the I&L sector. This is lower than both manufacturing and professional services. This is highly unusual and is an indication that the development restrictions and the lack of availability are suppressing demand.

3.5.5 A key reason for the lack of logistics activity in Greater Cambridge is due to the low availability that is shown in **Figure 3.3**. Overall availability is 4.6% and the rate of availability amongst good quality premises is just 2.6%. It is also the result of the limitations placed on large premises. Typically, large units (greater than 9,290 sq.m) play an important role in meeting local demand for logistics floorspace. However, there are so few that this part of the I&L sector plays a very limited role in meeting demand.

3.5.6 Planning policy in the wider FEMA allows for the development of larger units and also exhibits a higher proportion of leasing activity linked to logistics. In this instance, policy and leasing activity are closely linked.

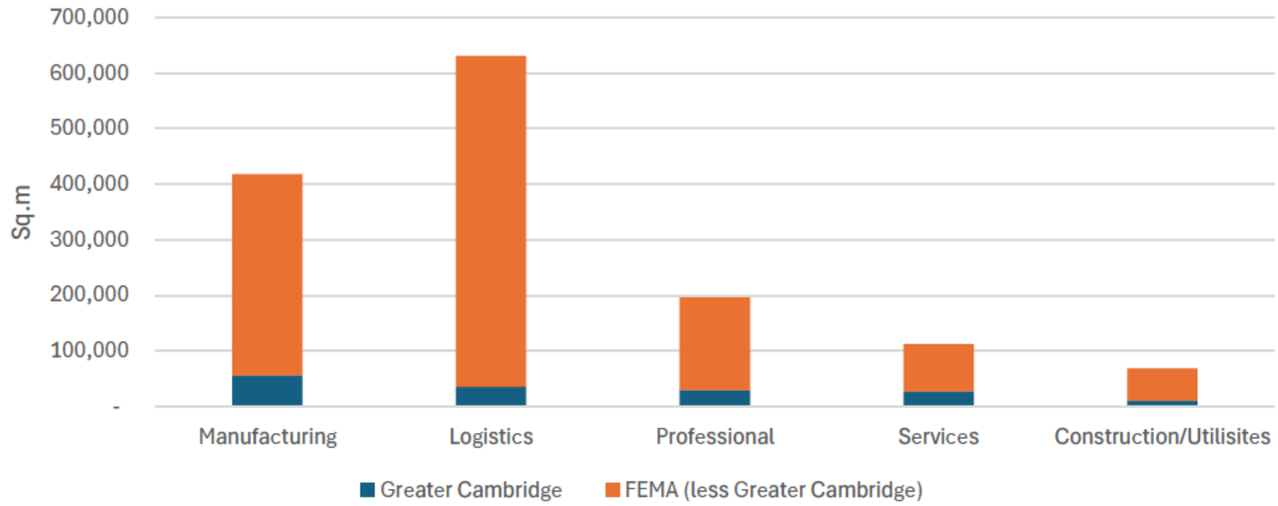
Figure 3.11 Share of Floorspace Leased by I&L Sector (2015-2025 YTD)



Source: CoStar, Savills 2025

3.5.7 The suppression of the logistics sector in Greater Cambridge is further evidenced in **Figure 3.12**. Even though Greater Cambridge's I&L inventory comprises 16% of all I&L floorspace in the FEMA, **Figure 3.12** shows that its share of logistics activity is just 5% of the all logistics activity in the FEMA. This result diverges with the 2025 Greater Cambridge Warehouse and Industrial Space Needs report (WISN) which is a key evidence base document for the local plan. The WISN anticipates that 40% of demand will be for distribution activities which we view as the same as logistics.

Figure 3.12 Leasing Transactions in Greater Cambridge and the FEMA (2015-2025 YTD)



Source: CoStar, Savills 2025

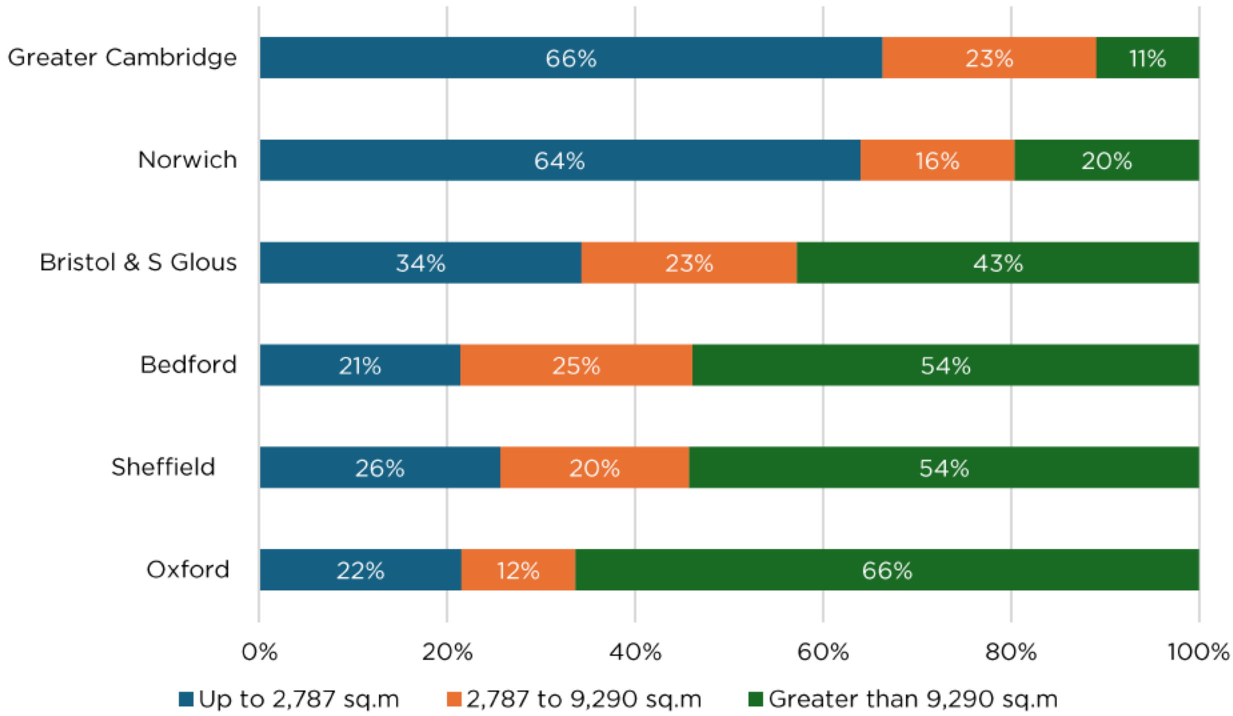
3.6 Role of Logistics in Comparable Cities

3.6.1 We have compared Greater Cambridge's I&L leasing activity with city regions of comparable size. The analysis is from 2018 because this is when the former South Cambridgeshire local authority adopted Policy E/11: Large Scale Warehousing and Distribution Centres which prohibits development of large premises.

3.6.2 **Figure 3.13** shows the distribution of leasing activity by size band. We consider small units to be less than 2,787 sq.m; mid-size units to be between 2,787 and 9,290 sq.m; and large units to be greater than 9,290 sq.m. The proportion of large units that have been leased in Greater Cambridge is 11%. This is comprised of a single transaction in an older warehouse building (the CDC Building) by retailer White Stores.

3.6.3 The proportion of lease transaction in the comparable city regions ranges from 20% in Norwich up to 66% in Oxford. The higher proportion of leasing transaction for large units illustrates the impact that planning policy has had on reducing leasing activity is Greater Cambridge. It shows that Greater Cambridge is an outlier.

Figure 3.13 Leasing Activity in Greater Cambridge and Other City Regions by Size Band



Source: CoStar, Savills, 2025

4. Greater Cambridge Supply

4.1 Summary

4.1.1 The supply position is very constrained in Greater Cambridge overall, and particularly in relation to land which is capable of meeting demand from B2 and B8 occupiers. The vast majority of the existing and proposed supply of I&L land is focused on Class E uses, and/or is provided within sites of relatively small scale which are therefore limited in the range of occupier demand that can be accommodated.

4.1.2 The proposed portfolio of draft allocations contained within the Regulation 18 Greater Cambridge Plan will go some way towards addressing this with the inclusion of the Subject Site (and Land Adjacent to the A14 Services).

4.1.3 There is currently no allowance for larger units within the proposed supply portfolio which means that local occupiers seeking to expand to larger floorplates will be forced to relocate out of Greater Cambridge, resulting in lost economic benefits and investment. This is evidenced by our analysis in the following Section.

4.1.4 The Subject Site is the only site within the proposed portfolio that is of a strategic scale and therefore able to cater to a full range of I&L occupier requirements, specifically those from businesses seeking B2 and B8 use, and to offer continuity of supply over the Plan period. It is important that the unique opportunity offered by the site is maximised and that any future policy allows flexibility to meet a range of demand from B2 and B8 occupiers seeking to serve Greater Cambridge.

4.2 Approach

4.2.1 We have reviewed the supply of land within Greater Cambridge. We have included sites with planning permission, an allocation, or draft allocation for I&L development (Eg(iii), B2 or B8 use).

4.2.2 Supply of land in Greater Cambridge has been reviewed within the following categories:

1. Land supply being sites with planning permission for I&L development; and
2. Pipeline supply of sites which benefit from an allocation for I&L development (but do not have planning permission and are therefore not immediately available).
3. Proposed allocations (potential future supply) of sites (which do not yet benefit from planning permission) have been reviewed separately.

4.2.3 Data collection in relation to Categories 1 and 2 was undertaken in March 2025 and represents a snapshot in time.

4.2.4 Speculative developer promotions that fall outside of the above definitions are not included in supply.

4.3 Land Supply

4.3.1 We have analysed the supply of land with planning permission for Eg(iii), B2 or B8 use within Greater Cambridge and the results are set out at **Table 4.1**. We have taken the sq.m figures and converted them using a 40% site coverage ratio which is what is used in the evidence base report.

Table 4.1: Land Supply (with Planning Permission)

Ref.	Name	Remaining Land (ha)***	Eg(iii)/B2/B8 Capacity (sq. m)	Comment
1	Hinxton Genome Campus	6.38	25,500*	Outline planning permission for the Campus expansion plans was granted in 2020 including 150,000 sq. m of employment floorspace. B2/B8 floorspace is limited by condition to those associated with genomics and bioinformatics data storage. Primary purpose is expansion of Wellcome Campus for Research and Translation space.
2	Cambridge South, West Way, Sawston (Accelerator Park)	2.00	8,018	Redevelopment of former Marley Building Materials site. Erection of 3 employment/research and development units with flexible Eg(ii), Eg(iii) and B8 uses.
3	Waterbeach New Town (East & West)	4.35	17,400	Waterbeach East includes provision for 2,400 sq. m of Eg(iii)/B8. Majority of remaining floorspace likely to be offices/R&D.
4	Land to the West of Cambridge Research Park (Plot 5,000 and Plots 6,200/6,300)	4.01	16,032**	Outline Application for the erection of up to 28,000sqm of mixed B1 (a) offices B1 (b) research and development B1 (c) light industrial B2 general industrial B8 storage and distribution and A1/A3 amenity café. B8 restricted by condition to up to 50% of units of 1,700 sq. m and above.
5	Northstowe	5.38	21,525	Employment land within Phase 1. (Eg, B2, B8)
TOTAL		**22.12**	**88,475**	

**Estimated floorspace contribution as per Greater Cambridge Warehouse & Industrial Space Needs (March 2025, paragraph 7.4)*

***Plot 5000 and Plots 6200/6300 only (Plot 4000 restricted of offices)*

****Indicative land area @ 40% assumed plot density*

4.3.2 There is a total of c. **22.12 ha** of land across **5 sites** within Greater Cambridge, with a total capacity of c. 88,475 sq. m (approximately 952,337 sq. ft). However, this headline figure does not account for qualitative issues:

- Whilst land at *Cambridge Research Park* can technically accommodate Eg(iii), B2 and limited B8 (subject to restrictions), given the context of the plots within the Research Park it seems likely that the plots will be developed for similar uses, and they are being marketed towards R&D and mid-tech occupiers. The actual contribution towards Eg(iii), B2, B8 may therefore be less than forecast above.
- *Waterbeach New Town* – similarly the majority of floorspace delivered at Waterbeach is likely to be within the R&D/office sectors with limited light industrial and B8.
- B2/B8 floorspace at *Hinxton Genome Campus* is limited by planning condition to those uses associated with genomics and bioinformatics data storage. This does meet an element of demand but is not available for the majority of occupiers.
- There are **no sites of scale** which are capable of accommodating a range of unit sizes to maximise occupier demand, or to provide continuity of supply over the Plan period.

4.3.3 Overall, taking into account the qualitative assessment, the supply of land with planning permission is highly constrained.

4.4 Pipeline Supply

4.4.1 We have assessed the pipeline supply of sites that benefit from an allocation (or are designated within an existing employment area) but do not have planning permission. The assessment includes sites with an allocation for Eg(iii), B2 or B8 use, consistent with the assessment of consented land supply above.

4.4.2 There are **no allocated sites** which have not already been included within the review above. All those within the search parameters are now benefiting from planning permission.

4.5 Draft Allocations

4.5.1 For the purposes of this exercise, the employment allocations included within the Greater Cambridge Draft Local Plan (Part 2, Part 3, Part 4 and Part 5) Site Allocation documents have been reviewed.

4.5.2 The vast majority of the draft allocations are focused on the provision of employment floorspace within Class E, being offices, Research & Development, with some element of light industrial use. The Subject Site is one of the minority of the allocations proposed which provides for B2 and B8 use. The proposed allocation of the Subject Site is therefore fully supported and vital to bolster the supply of land for B2 and B8 use within Greater Cambridge.

4.5.3 Proposed allocations which include provision for B2/B8 use are summarised below:

- Land north of A1307, Bar Hill (Slate Hall Farm): GCLP draft policy S/DS: Development Strategy, which informs the site allocations identifies that the site is proposed to be allocated for approximately 240,000 metres square (GIA) of commercial uses, providing a flexible range of unit sizes within B2 or B8 use (the Subject Site forming the primary part of this allocation).

- Land to the south of Cambridge Services A14: c. 18.2 ha site proposed to be allocated to meet demand for local employment uses with capacity for approximately 90,000 square metres gross internal area of Class B2 (General Industrial) or Class B8 (Storage or Distribution), with around 2.25 hectares focused on lorry parking to provide around 150 spaces.

- Clifton Road area: redevelopment of existing employment area to include reprovision of existing B2/B8 floorspace;
- Land adjacent to A11 and A1307 at Grange Farm: Class B2 (General Industrial) floorspace and Class B8 (Storage or Distribution) through provision of a local last-mile logistics hub/warehousing of approximately 20,000 square metres (GIA);
- Northstowe New Town: approximately 19,000 square metres (GIA) of Class E(g)/B2/B8 in Phase 1 of this major residential led development.
- Land north of Waterbeach: Employment floorspace up to 39,800 square metres (GIA) across the total site including offices (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)) and storage or distribution (Class B8).
- Land at Buckingway Business Park, Swavesey: Capacity for approximately 10,000 square metres gross internal area of Class B2 (General Industrial) or Class B8 (Storage or Distribution). B8 uses would be limited to smaller premises to meet local needs.
- Norman Way, Over: 1.7 ha site with capacity for 6,100 square metres gross internal area of office (Class E(g)(i)), research and development (Class E(g)(ii)), light industrial (Class E(g)(iii)), general industrial (B2) and storage or distribution (B8) floorspace.

4.5.4 The majority of these proposed sites will only provide limited opportunities for B2 and B8 in reality due to their scale (for example, Norman Way, Land at Buckingway Business Park, Northstowe employment component, Grange Farm). It is unlikely that a significant component of B8 floorspace will be delivered at Waterbeach, with the focus here on the R&D/office sectors. The Subject Site and Land at A14 Services are therefore the only sites which are focused on the delivery of a more meaningful quantum of I&L use.

5. Market Demand Assessment

5.1 Summary

5.1.1 Overall, there is a good level of demand evidenced by occupier requirements across the full spectrum of size ranges. However, transactions of units of 1,858 sq. m (20,000 sq. ft) in Greater Cambridge have been very limited over the last 2 years with only three units being taken up since 2024. This is indicative of a very constrained supply position of suitable units in line with our analysis at Section 3.

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

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

5.2 Introduction

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

5.3 Meeting a full range of local requirements

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

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

5.3.3 Businesses within the sector occupy buildings across a wide range of scales to meet their specific business needs. The size of the unit does not determine the type of occupier or the market being served; it is much more nuanced. The very largest units are more likely to be occupied by either logistics companies operating across a regional or national catchment, or manufacturing companies with considerable output. However, it is important to note that there is no fixed threshold above which it can be determined that the catchment of the facility is greater than local.

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

5.3.5 Experience shows that it is common for locally-based companies to require large premises to meet their operational requirements as they grow and adapt to changes in the business environment. Savills have identified a number of local Greater Cambridge companies who occupy large units that were built prior to the restrictive policy. If these companies' operations required to identify large premises today, they would have to leave the area. **Table 5.1** overleaf provides three examples of local, Greater Cambridge-based occupiers of large units.

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

- Granta Processors Limited: long standing Cambridge-based company processing seeds and pulses for human consumption. The origin of Granta UK goes back over 100 years. They now occupy a very old warehouse unit of c. 9,420 sq. m (101,412 sq. ft) in St Neots.

- G's Fresh: a family owned fresh produce company which was founded in Ely in 1952 and now occupy a premises of c. 18,580 sq. m (200,000 sq. ft).

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

Table 5.1 Local Occupiers in Greater Cambridge with Large I&L / Logistics Premises

OCCUPIER	IMAGE
Cambridge University Press & Assessment (CUPA) occupies a 185,000 sq.ft warehouse built in 1990. The building is primarily in industrial use with about 5% of the floorspace for offices. The occupier is part of the University of Cambridge. CUPA's main job is to design and produce exams used around the world. The warehouse accommodates a range of logistics activities: the printing and packaging of exam packages; the distribution of exam materials throughout the world to schools, exam centres and British Councils; and the receiving, processing and storage of exam papers.	
Fred Smart Logistics occupies a 120,000 sq. ft warehouse in Papworth Business Park in Papworth Everard. The private company carries out logistics (storage and distribution). Although newly established, the company is part of the longstanding Frederic Smart & Son Ltd which started as an agricultural products trader. The company initially established its presence in Whittlesford in 1919 when it bought a mill. The company has continued to expand its operations, acquiring larger warehouse sites to expand its storage and distribution capacity.	
Hain Daniels occupies a 290,000 sq. ft warehouse on Chivers Way in Histon. Whilst Hain Daniels is based in Leeds, the Histon site was originally occupied by the Chivers family who began jam production in the 1870s. The facility became one of the largest jam and preserves manufacturers in Britain. The Histon operation was replaced by Premier Foods who bought the local factory and redeveloped it. The local operation was then purchased by Hain Daniels who continues to produce jam from the site, continuing the Chivers family's food production activities. Today, the site accommodates a range of activities including food manufacturing, R&D, supply chain logistics, and packing and warehousing.	

Source: Savills, CoStar, 2025

5.4 Occupier Demand

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

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

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

5.4.4 In the context of these points, We have provided analysis of relevant current live market requirements which focus on Greater Cambridgeshire and surrounds at **Table 5.2** below. Please note that this is not an exhaustive list and there are a number of requirements with a much larger search catchment which include this location which we have not included.

Table 5.2: Live Requirements

COMPANY	SIZE (sq. m)	SIZE (sq. ft)	SEARCH AREA	COMMENTS
Marshall Land Systems	13,935	150,000	Cambridgeshire	Immediate requirement. Having to look into Norflok / Suffolk for suitable options
Cambridge Aerospace	4,645-6,503	50-70,000	Cambridgeshire	B2 advanced manufacturing requirement looking at existing units
Bretts transport	9,290-23,225	100,000 - 250,000	Cambridgeshire	Contract led requirement considering existing options
Confidential Occupier c/o Carter Jonas	3,716-5,574	40-60,000	Cambridgeshire	Advanced manufacturing requirement requiring c.1MVA of power
Hilton Foods	13,935-18,580	150,000-200,000	Cambridgeshire	Viewed existing buildings in the past but requirement remains unsatisfied. Likely to favour built to suit with some cold store fit out.
Confidential Occupier c/o BNP	23,225	250,000	Huntingdon & surrounds	Seeking built to suit options and could be for Coca Cola / Britvic

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COMPANY	SIZE (sq. m)	SIZE (sq. ft)	SEARCH AREA	COMMENTS
Confidential occupier c/o CBRE	4,645-27,870	50,000 - 300,000	Bedford + 30 miles	Considering existing or built to suit options.
Westland horticulture	46,451+	500,000 +	A1 / A14	Long standing unsatisfied requirement for relatively local occupier.
Confidential occupier c/o CBRE	37,161+	400,000 +	A14 Corridor	Currently focused on existing / under construction options in Corby.
CEVA	18,580	200,000	Eastern Region	Ceva are considering options in the eastern region. This is partially linked to lease expiries on their space in Mendlesham, Suffolk. There is a strong preference for the A14 corridor.

Source: Savills Industrial Agency

5.4.5 This demonstrates that there is a range of demand from occupiers seeking new premises which would be suitable for the Subject Site should this be available. Demand is across a full range of unit sizes up to the largest units.

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

5.4.7 Marshall Group, who are based in Cambridge, have sold part of their business (Marshall Land Systems), to a Canadian based investment company (Flowing River Capital). The sale has meant that Marshall Land Systems are seeking a new site. They are in temporary space in Cambridge but need to find a new warehouse and be operational by the end of 2026. They are seeking factory / warehouse space of 13,935 sq. m (150,000 sq. ft) with a further 1,858 sq. m (20,000 sq. ft) of offices and c.300 car parking spaces for staff. The strong preference is to be within 30 miles of Cambridge however they are struggling to identify suitable options in this area. They have therefore inspected options as far afield as Bury St Edmunds and Ipswich.

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

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

5.5 Greater Cambridge Take-up

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

5.5.2 There has been no take up at all over the last 12 months. Extending the time period to 2 years, transactions within Greater Cambridge are still extremely limited with only 3 transactions:

- Tesla took a unit of 3,884 sq. m (41,808 sq. ft) at Bar Hill in November 2024.
- Arken Pop International took a unit of 2,939 sq. m (31,630 sq. ft) at The Way, Royston in May 2024.
- UKRI took a unit of 2,990 sq. m (32,183 sq. ft) at Trafalgar Way, Bar Hill in April 2024

5.5.3 In line with the findings set out within Section 3, it is clear that transactional activity within the I&L sector is being significantly supressed within Greater Cambridge due to a lack of supply, notably in relation to larger units.

6. Conclusion

6.1.1 The Subject Site's scale, location and accessibility provide the opportunity to flexibly respond to occupier demand for high quality and modern Industrial & Logistics (I&L) floorspace across a range of sizes, giving the ability to serve Greater Cambridge from a highly accessible location, with excellent linkages to labour force, supply chain companies and multi-modal distribution facilities.

6.1.2 It is therefore ideally placed to meet demand from occupiers within the I&L sectors seeking units across a range of size bands.

6.1.3 Greater Cambridge has a significant undersupply of I&L premises, and particularly larger premises. This is the result of an artificially suppressed supply (via planning policy) and as a consequence Greater Cambridge is out of kilter with comparable locations and failing to meet the needs of the sector (which is vital to support both the local and national economy).

6.1.4 The supply of land is also very constrained with the Subject Site being a vital and welcome addition to the portfolio of land. It is the only site of strategic scale and it is therefore very important that the opportunity is maximised and a full range of occupier demand can be accommodated.

6.1.5 A supply of land and buildings at all size ranges, including over 9,300 sq. m, is essential to meet local occupier demand (there are a number of local occupiers within Greater Cambridge within larger units, development of which would not have been permitted in recent years).

6.1.6 Current live demand cannot be met within Greater Cambridge due to the lack of supply of high quality units or land to meet the needs of occupiers seeking premises across the larger size ranges, but particularly those looking for accommodation of 9,290 sq. m (100,000 sq. ft) plus.

6.1.7 This is evidenced by a lack of take up, as well as by occupiers seeking to locate in alternative areas or remaining in sub-optimal accommodation. This is evidence that the I&L market is not currently operating efficiently which is impeding the local economy.

6.1.8 **The principle of allocation of the Subject Site is therefore fully supported and it is essential that this enables development of a range of unit sizes, in order to meet market demand.**

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Appendix A : I&L Sector Trends

A Resilient Sector

National Take-Up Exceeds Pre-Covid Average

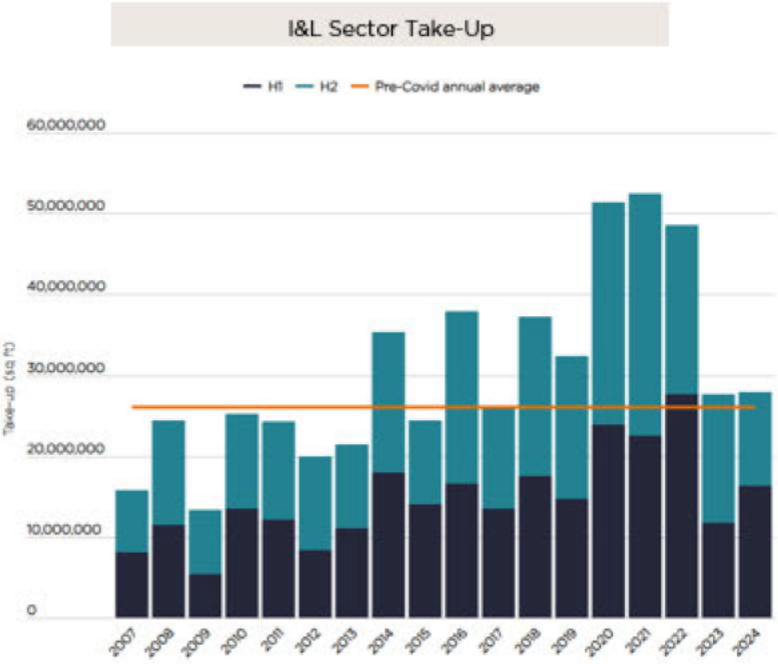
Savills January 2025 Big Shed Briefing found that at the national level overall, 2024 was the fifth best year ever for take-up, outside of the pandemic period, and in that long-term context is not a bad outcome given the wider economic and geopolitical situation. At a national level, take-up for 2024 has reached 27.97 million sq.ft (2.6 million sq.m) across 116 transactions, which is 8.0% above the pre-Covid average.

Demand for speculatively constructed units increased over the course of 2024, reaching 6.97 million sq.ft (648,000 sq.m), a rise of 27% when compared to 2023.

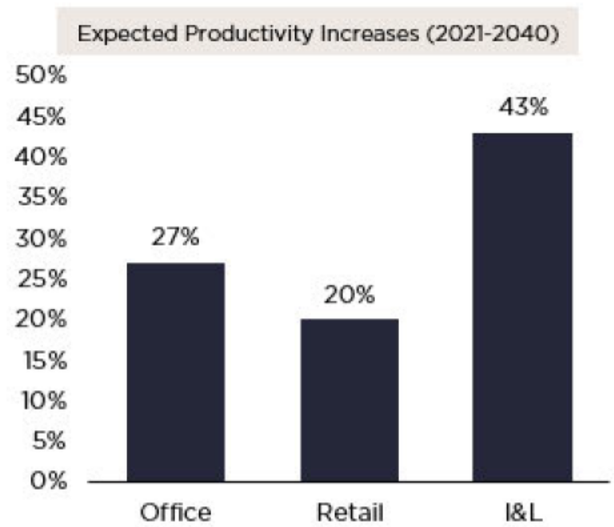
We are not observing any trend of occupiers trading down to poorer quality (and cheaper) units; indeed, quite the opposite is true, with 77% of the space transacted being for grade A units, up from 72% in 2023, and exceeding the pre-Covid average of 68%.

Manufacturing-related companies accounted for 32% of the market, the highest level since 2015, thereby giving further evidence to the near/re-shoring trend.

The fact that take-up remained above the pre-Covid average despite the macro-economic challenges, illustrates the **resilience of the I&L sector and the strength of the underlying demand drivers.**



Source: Savills Big Shed Briefing (January 2025)



Highest Expected Productivity Growth

Successive UK Governments have failed to address the productivity issues that have plagued the UK economy. In this regard, productivity growth within the I&L sector is predicted to grow at a faster pace (43% between 2021 and 2040), compared with other major commercial uses, which have much lower productivity growth. Office based employment is expected to see productivity growth of 27% between 2021 and 2040, with retail productivity only expected to grow by 20%. What this effectively means is that the value of outputs related to the I&L sector, relative to the cost of inputs, is estimated to grow faster than the rest of the UK economy.

As a result, wage growth and wider investment within the sector will also likely outpace the wider economy. **However, the positive contribution that the I&L sector can make will be restricted if supply continues to fail to keep pace with demand.**

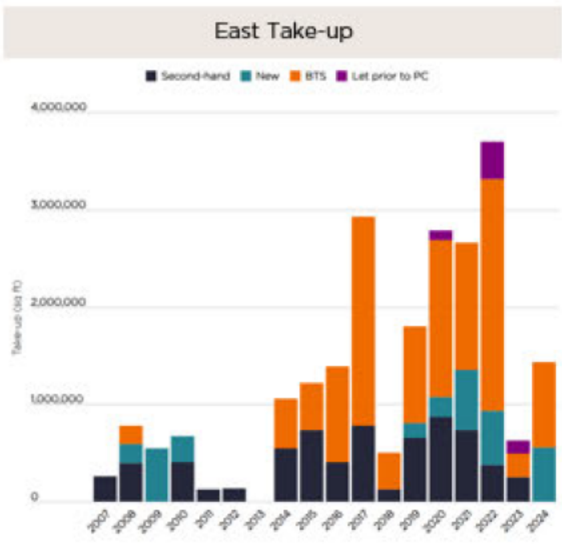
East of England Sees 129% Rise in Take-Up

The Savills Big Shed Briefing identified a strong rise in annual take-up across the East. Take-up reached 1.43 million sq.ft, marking an incredible 129% increase compared to the lows seen in 2023 and a 13% increase above the long-term annual average take-up figure of 1.25 million sq.ft.

The rise in take-up above the long-term annual average, despite recent macro-economic challenges, illustrates the resilience of the I&L sector and the strength of the underlying demand drivers.

In terms of specification, 0% of space transacted in 2024 was second-hand, 39% was newly built speculative development, and 61% was build-to-suit ('BTS') space. The long-term average typically sees 29% of space transacted as second-hand, 53% as BTS, and 18% as new speculative development. This demonstrates the shift towards new-build development and that occupiers are starting to disregard second-hand development due to the constraints they pose.

In 2024, 74% of demand has stemmed from manufacturing-related firms, 17% from third-party logistics firms, and 9% from food producers.



Source: Savills Big Shed Briefing (January 2025)

I&L Growth is Structural, Not Cyclical

Critical National Infrastructure

The past decade has seen the I&L sector undergo a remarkable transformation, reshaping operating models and occupier requirements. The sector is also 'critical national infrastructure' that supports the functioning of our economy and the way we live our lives.

The I&L sector enables the movements of goods across a multi-modal network of road, rail, air, and water routes. Most businesses draw on supply chains that rely upon these multiple modes of transport and on the transfer between freight nodes to warehouses, and then finally onto the end customer.

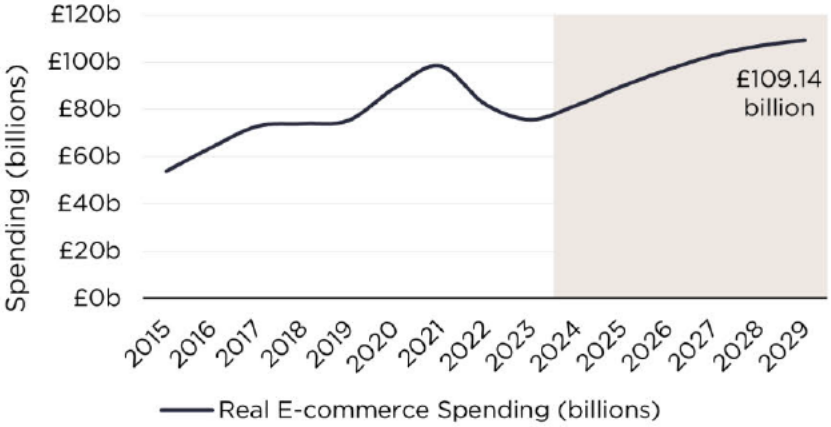
Without these facilities, the delivery of our purchases would be much slower, more expensive and we would have less choice.

Significant Freight Infrastructure

The Rise of E-Commerce

E-commerce has grown substantially over the past decade, with the Covid-19 pandemic accelerating this trend. Statista, a respected source of online retail projections, estimate that inflation adjusted online retail will grow to £109 billion by 2029.

The growth in online shopping has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional bricks-and-mortar retailers (Prologis, 2016).



Source: ONS (Historic), Statista (Forecast)

0.8% Increase
CAGR (2025-2060)

1.0% Increase
CAGR (2019-2039)

2.6% Increase
CAGR (2024-2050)

1.5% Increase
CAGR (2024-2029)

Source: DfT, MDS Transmodal, Boeing, Savills

Global Freight Flows

Freight flows are another key driver of I&L floorspace demand. Significant growth is forecast across all freight modes. Freight arriving and leaving the UK needs to be sorted, packaged and distributed via a network of freight handling infrastructure (i.e. ports, airports, rail freight interchanges and motorways) and conveniently located I&L premises to reach end customers.

Protecting Supply Chains

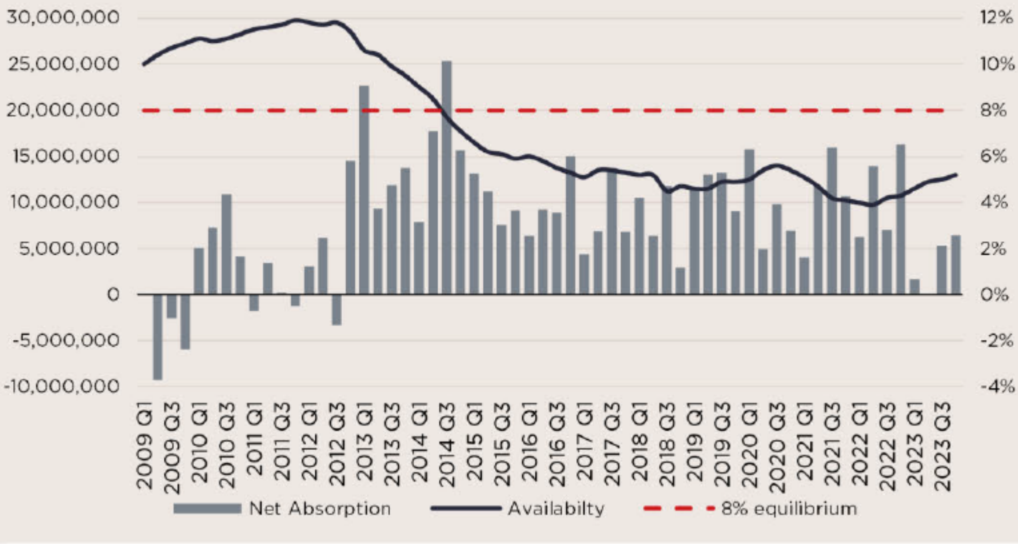
Recent geopolitical challenges have highlighted the UK's reliance on unpredictable international supply chains. As such, companies have started to re-shore and near-shore their operations closer to end customers in the UK to minimise future disruptions. This results in a net increase in demand for I&L units in the UK.

Real Estate Implications

Continued strong demand has meant availability has remained below the 8% equilibrium rate at the national level for much of the last decade.

When new development is built it is quickly occupied. The lack of available supply means demand is 'suppressed' as not all occupiers can find the space they need.

To eliminate this supply-demand imbalance, more development is needed at a rate above historic levels.

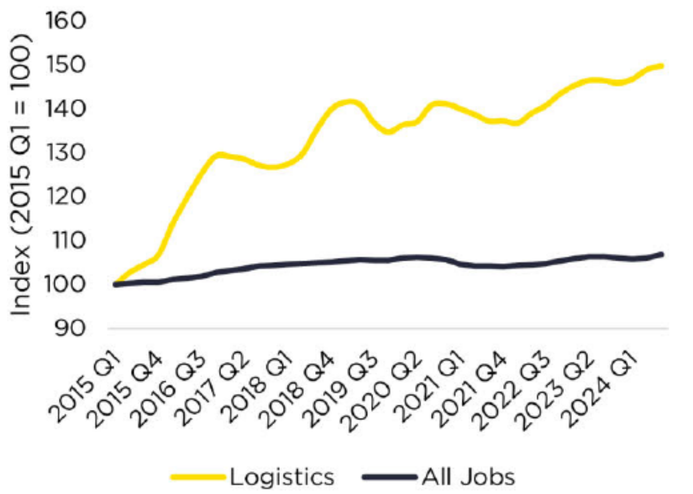


The I&L Sector Employs Many People in High Quality Jobs

It's the fastest growing sector of the economy

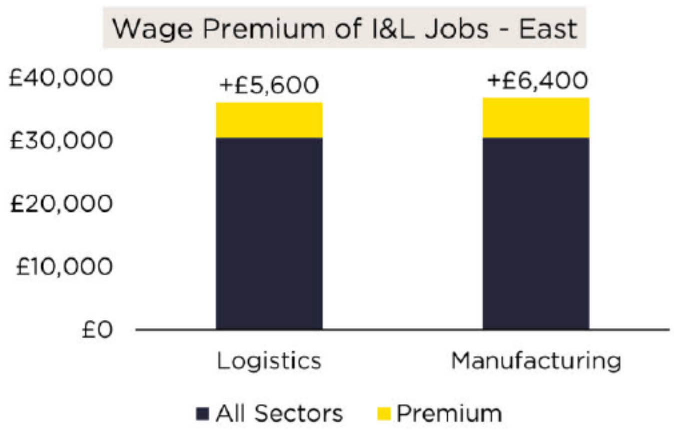
The logistics sector is the fastest growing segment of our economy, both, in recent years and over the long term.

Between 2015 Q1 and 2024 Q3 the number of jobs in the logistics sector grew by 49.9% in the East of England region compared to only 6.8% across the economy as a whole.

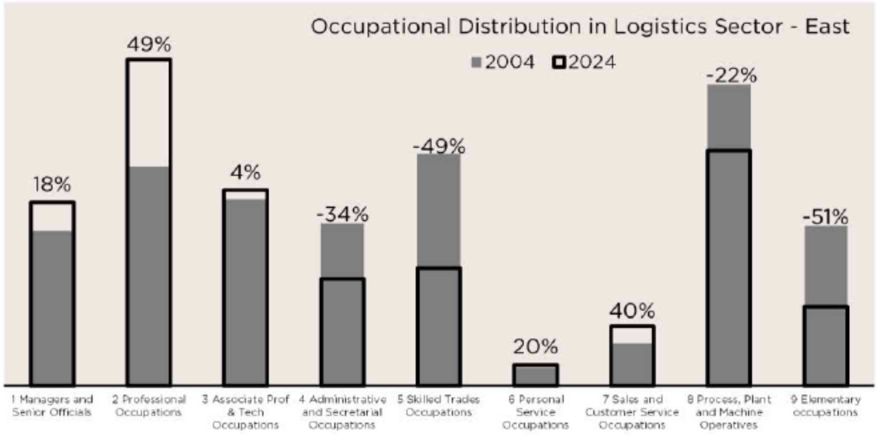


Source: ONS Workforce Jobs by Industry

I&L Jobs Pay More than Average



Notwithstanding its importance in terms of employment and GVA contribution, the I&L sector is subject to a number of misconceptions about average pay levels and skills. Compared to the All-Sector average, Logistics and Manufacturing sectors' annual median wages are +£5,600 per annum higher and +£6,400 per annum higher respectively in the East of England. In addition, entry-level jobs in logistics are relatively well-paid, with median annual pay being 47% higher than across jobs in the same occupational category (Frontier Economics, 2022).



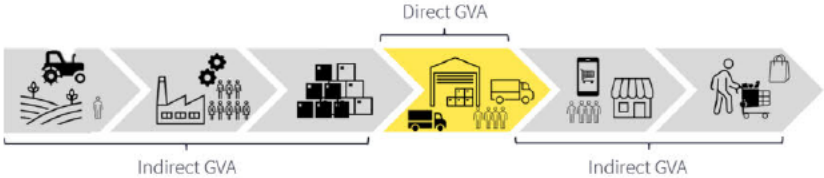
Source: ONS Annual Population Survey

It provides high quality jobs

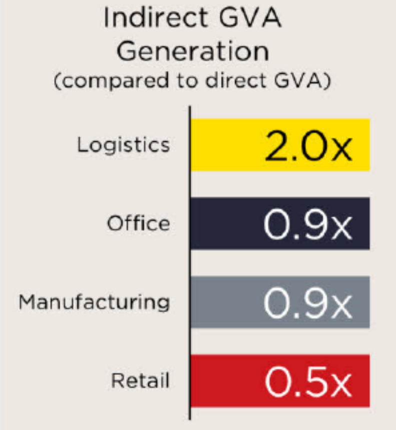
The jobs offered within the sector are becoming higher skilled and more diverse. Within the Transportation and Storage industry, the highest skilled occupations (Groups 1-3) have increased by 28% between 2004 and 2024 in the East of England. These roles are associated with engineering and technological professions in response to automation and robotics and increased office collocation.

Economic Contribution is Much Larger Than On-Site Jobs

Common misconception about the I&L sector being a low-density employer, fails to recognise the wider role it plays in supporting jobs which are not physically within a warehouse but are enabled by its operations. For every 10 new warehousing jobs created onsite, another 7 to 12 jobs are created offsite.



The indirect GVA of logistics in the UK is 2.0 times the direct GVA, vastly greater than other sectors. This effectively measures the role is plays in supporting other business sectors and the economy more generally.



Source: ONS Input Output Tables 2019

Appendix 2

Site S/SHF Site Allocation: Indicative Masterplan (Chetwoods, January 2026)

Key

- Site Allocation Boundary (draft GCLP, Policy S/SHF)
- Planning Application Boundary
- **Development Zone** (21.5m / 18.5m / 13.5m / 8m) B2, B8, E(g)(i), E(g)(ii), E(g)(iii), Ancillary community & amenity uses (Use Classes E & F2) (Including buildings, parking, service yards, hard & soft landscaping, road & drainage infrastructure)
- Non-Developable Area - Retained Slate Hall Farm
- **Landscape Infrastructure** To include Nature Park, Biodiversity Net Gain provision, existing & proposed landscaping and drainage infrastructure
- Existing Landscape (Retained)
- Indicative Road Infrastructure & Zone Access Points
- Existing pedestrian/cycle paths to be retained
- Zone 1H
- Proposed Primary Access

Schedule Notes:
All sq. ft areas are based on the conversion factor of 10.763910417 to ensure accuracy.

However, decimals are hidden values which are rounded up / down which can sometimes result in the totals not always adding up.

NB.
- SUBJECT TO SURVEYS. CONSTRAINTS & PLANNING.
- LAYOUT TO BE TRACKED.
- HEIGHTS INDICATED FROM FFL.

0 20m 50m 100m
1:2500

Contractors must verify all dimensions on site before commencing any work or shop drawings. This drawing is not to be scaled. Use figured dimensions only.

Subject to statutory approvals and survey.

Building areas are liable to adjustment over the course of the design process due to the ongoing construction detailing developments.

Please note the information contained within this drawing is solely for the benefit of the employer and should not be relied upon by third parties.

The CDM hazard management procedures for the Chetwoods aspects of the design of this project are to be found on the "Chetwoods - Hazard Analysis and Design Risk Assessment" and/or drawings. The full project design teams comprehensive set of hazard management procedures are available from the Principle Designer appointed for the project.

Notes:
Please note Title Plans have been scaled using Ordnance Survey features which may have altered over time. Complete accuracy cannot be guaranteed without further on-site survey.

Any dimensions given are to be confirmed with site measure.

Rev	Revision Description	Date	Author/ Reviewer
PL4	Title renamed	22.01.26	MK/PS
PL3	Updated to Lichfields comments. Red line updated and key/plan updated	22.01.26	MK/PS
PL2	Allocation boundary added	14.01.26	MK/PS
PL1	First Issue	08.01.26	MK/PS

PLANNING

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Project
Cambridge 25

Client
Lolworth Developments Limited

Drawing Title
S/SHF Site Allocation: Indicative Masterplan

Scale	Size	Drawn	Checked	Date
1:2500	A1	MK	PS	08/01/2026

Project	Originator	Zone	Level	Type	Role	Number	Rev.
4585	CA	00	00	DR	A	05001	PL4

Appendix 3

Slate Hall Farm Building Heritage Appraisal Statement (RPS, January 2026)

101 Park Drive, Milton Park,
Abingdon, Oxfordshire,
OX14 4RY
T +44(0)1235 821 888

26th January 2026

SLATE HALL FARM BUILDING HERITAGE APPRAISAL STATEMENT

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

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

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

[…]

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

[…]

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

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

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

Richard Smalley FSA BA (Hons) MCIfA AssocIHBC

Senior Director

Tetra tech/RPS

Slate Hall Farm

Slate Hall Farm setting

Slate Hall Farm setting

Slate Hall Farm setting