

Your ref: HELAA Site ID: 115093  
 Our ref: St Neots Road, Dry Drayton  
 DD:  
 E:  
 Date: 20/01/2026

Greater Cambridge Planning Policy  
**Via Email**

Dear Sir / Madam

**EMERGING GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION – HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT SITE ID: 115093 - LAND TO THE NORTH OF ST NEOTS ROAD, DRY DRAYTON**

This representation has been prepared on behalf of Paragon Land & Estates Ltd (hereafter “Paragon”) in relation to their land interests on Land to the North of St Neots Road, Dry Drayton (the “Site”) (see **Appendix 1**). The Site has most recently been reviewed in the 2025 Housing and Economic Land Availability Assessment (HELAA) under Site ID: 115093 and has been discounted for allocation.

This representation addresses the red, amber and green (RAG) scores in the HELAA assigned to the Site to demonstrate that like adjacent allocation S/RRA/SNR, also in control of Paragon, is available, suitable, deliverable and achievable for allocation and can serve a range of potential uses.

Whilst it is acknowledged that the Site has previously been promoted for such E(g) employment uses, the market has materially moved on since this time, and therefore the range of proposed potential uses can be expanded to include B2 industrial and B8 storage and distribution. The reasons for which are set out below. The Site is also available for residential uses.

**HELAA 2025 Response – Site ID: 115093**

The following sub-sections follow the Council’s structure in the HELAA (2025) and seeks to address the scores and comments assigned to the Site by the Council where necessary.

Suitability

MATTER	RESPONSE	PARAGON SCORE
<b>Adopted Development Plan</b>	We welcome the continued position that whilst there are some policy constraints these are capable of being addressed via the planning application process.	Amber - consistent with HELAA score
<b>Flood Risk</b>	It is acknowledged that the Site does contain areas of land which are at higher risk of surface water. However, there is sufficient land to deliver an acceptable scheme, and the surface water can be appropriately addressed via a detail drainage	Amber - consistent with HELAA score



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	strategy without impact to onsite or offsite flood risk.	
<b>Landscape</b>	<p>We welcome that officers consider that the Site could be mitigated through the application process, however, they considered that development of the Site would have a detrimental impact that requires mitigation.</p> <p>The Site's value is already eroded by virtue of being between two roads and in close proximity to drainage features associated with infrastructure. If Cambourne to Cambridge ("C2C") is delivered it will also require some areas of the Site, which further erodes its character.</p> <p>We believe that on balance development on the Site would have a neutral impact which could be enhanced via development.</p>	Green – improved score compared to amber in the 2025 HELAA
<b>Biodiversity</b>	<p>There does not appear to be a RAG score assigned to the Site in this regard. We note the potential to have an impact of a nearby SSSI which could require mitigation or compensation.</p> <p>Given the separation distance to SSSI it is highly unlikely that development would have an impact.</p> <p>Further, if employment uses are allocated on the Site, it would remove risk of recreational pressures.</p> <p>We believe on balance the score that can be assigned to the Site is green.</p>	Green – no score previously attributed by the Council.
<b>Policy</b>	We welcome the recognition that the Site is not on any protected open space designation, nor is the Site on Green Belt land.	Green – same as the Council
<b>Historic Environment (Built and Below Ground)</b>	No further comments.	Green – both above and below ground heritage as identified by the Council
<b>Accessibility</b>	<p>The Site has been identified as having adequate accessibility to key local services, transport and employment opportunities and would not require the delivery of accompanying key services.</p> <p>However, the delivery of C2C would ensure the Site is well served by public transport.</p>	Amber – same as the Council and based upon the scoring system in the HELAA methodology

<b>Highways</b>	<p>There are no concerns raised in regard to highways matters, yet the Site is tentatively scored amber by the Council.</p> <p>It is clear that safe access can be achieved and that the modest size of the development parcel would not generate traffic that would harm the functioning of trunk or local roads.</p>	Green – improving score against amber in the HELAA
<b>Noise, Vibration, Odour and Lighting</b>	<p>We welcome that officers recognise that the Site can be made acceptable in all these terms subject to detailed design.</p> <p>We believe these comments have been offered in relation to residential uses given the reference to living conditions.</p> <p>If the Site is developed for employment uses, we believe that it can be scored green.</p>	<p>Green – if employment is allocated on the Site</p> <p>Amber – should residential uses be allocated on the Site</p>
<b>Air Quality</b>	No further comments.	Green
<b>Contaminated Land</b>	No further comments.	Green
<b>Agricultural Land</b>	Whilst the land may be Grade II, given the size of the Site it does not significantly contribute to the delivery of food and produce.	N/A
<b>Overall Score</b>	<b>We believe that above demonstrates the Site is a suitable location for development and compatible with neighbouring uses. Where constraints exist, these can be appropriately mitigated.</b>	<b>Green</b>

Available

There are no changes in relation to this matter, the Site is still available and can be delivered within five years work alongside any progress on C2C.

The Council has scored this amber but have not provided any explanation as to why, as there is no evidence of legal or landownership constraints that may impact the Site’s availability. As such, the Site should be scored green, consistent with the HELAA methodology.

Achievability

We welcome the score of green and have no further comments to make.

### Greater Demand and Industrial and Logistics Uses

Whilst the Site was first promoted for E(g) use classes (office, R&D and light industrial), there has been a greater recognition of the demand for industrial and logistics warehouse space across Greater Cambridge.

It is our view that the Site would represent a good employment site similar to that proposed of allocation to the west under site reference: S/RRA/SNR also in control of Paragon. As such, if the Council is minded to allocate this Site, we believe it could be allocated for E(g) uses as well as B2 and B8 for reasons set out below.

The Council has considered this further within their Greater Cambridge Warehouse and Industrial Space Needs Assessment which was prepared by IcenI (March 2025). Table 6.4 of the report identifies indicative land requirements as shown below:

**Table 6.4 Indicative land requirements by type and location**

Type	Proportion of total	Floorspace (sq.m)	Unit sizes (sq.m)	Location
Manufacturing /advanced manufacturing B2	15%	48,000	500 – 5,000	Cambridge commutable
General Industrial B2/B8/E(g)	10%	32,000	500 – 2,500	Urban / urban fringe
Wholesale and trade	10%	32,000	100 – 2,000	Typically urban / urban fringe (trade)
Distribution B8	40%	127,000	2,000 – 5,000+	Strategic Road Network (SRN)
Mid-tech B2/B8/E(g)	10%	32,000	100 – 2,000	Enhanced connectivity to labour market, being urban fringe or science park proximity
Other uses i.e. leisure	15%	48,000	500 – 2,500	Prefer urban / urban fringe
Total	100%	317,000		

Source: IcenI Projects (may not sum due to rounding)

This sets out a significant need for warehouse space to satisfy several different functions (residual need of 197,000 sqm). Table 7.5 of the same report further considers existing supply and the approach to distributing need by warehouse / industrial typologies:

Table 7.5 Land recommendations by type and location (notional) (sqm)

Type	Notional need by type (sq.m)	Supply + completions (sq.m)	Residual requirement	Notional approach to distributing residual need by type (sq.m)	Preferred Location
Manufacturing B2	47,550	-6,390 net + 91,200 First Proposals	c.-200,490 (undersupply)	40,000 (10 ha) reflecting limited positive balance	Cambridge commutable
Distribution B8	126,800			100,000 (25 ha)	SRN location / urban fringe for last mile
General Industrial B2/B8/E(g) incl. trade / wholesale	63,400			40,000 (10 ha)	Urban / urban fringe / access
Other uses	47,550	34,652 E(g)(iii)	+2,952 (marginal oversupply)	15,000* (5 ha)	Enhanced urban connectivity / urban fringe / science park proximity
Mid-tech B2/B8/E(g)	31,700				
<b>Total</b>	<b>317,000</b>	<b>119,500</b>	<b>-197,538</b>	<b>197,000</b>	

Source: Icen Projects

There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on this Site.

Given the Site's sustainable location in close proximity to large housing proposals (Cambourne and Bourn Airfield), proximity to Cambridge urban fringe and its strong access to the strategic road network; it could function across the range of uses that may look to take up warehouse space as well as function for the current draft allocated uses.

### National Planning Policy Framework (NPPF) – December 2025 Consultation Document

Whilst the NPPF consultation document carries limited weight and is subject to change, it does set a clear direction of travel for national policy, particularly a clear set of rules for plan-making.

The need to consider this draft NPPF for plan-making purposes is reaffirmed by the Secretary of State in his letter to Local Authority Leaders and Metro Mayors<sup>1</sup> in December 2025, however, we acknowledge the Council's intention to prepare this Plan under the old plan-making system and therefore the December 2024 NPPF.

<sup>1</sup> Secretary of State Letter to Council Leaders 16 December 2025: [Letter from the Secretary of State to local authority leaders and metro mayors: Next phase of reforms to accelerate growth and housebuilding](#)

Proposed Policy E1: Providing the conditions for long term economic growth - sets out the rules which development plans should follow to support business investment and employment.

Limb 2 of the emerging policy recognises that commercial property markets can change rapidly, and as a result, 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).

In terms of the Site itself, it does not have any spatial qualities or constraints, rather, it has qualities that mean it should be considered for a wide range of uses (ie: good access to the strategic road network). Therefore, if the Council is minded to allocate the Site it could be allocated for E(g), B2 and B8. Equally, the Site is available to be allocated for residential uses should the Council wish.

### **Cambourne to Cambridge (C2C)**

Whilst we accept that the alignment of C2C does run within the Site, and areas of the Site are required temporarily to deliver C2C; development of Site can be delivered in a phased manner based around C2C should it come forward in due course.

The Site would be in close proximity to bus stops and the park and ride proposed as part of C2C and therefore is considered to be in a highly sustainable location which can support employment uses.

### **Summary**

I hope the above is clear. We believe the Site represents a strong opportunity for development similar to draft allocation S/RRA/SNR, located beyond the Cambridge Green Belt and can be delivered within 0-5 years.

Whilst not the subject of detailed review on this representation, we understand that a key theme of numerous submissions to the Council will include concerns about the lack of housing and jobs being planned for. This Site can help address these concerns via a positive allocation ensuring sufficient supply and choice in the market.

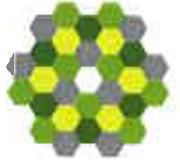
Should you have any questions, or wish to discuss the points made in this representation, please do not hesitate to get in touch.

Kind regards,

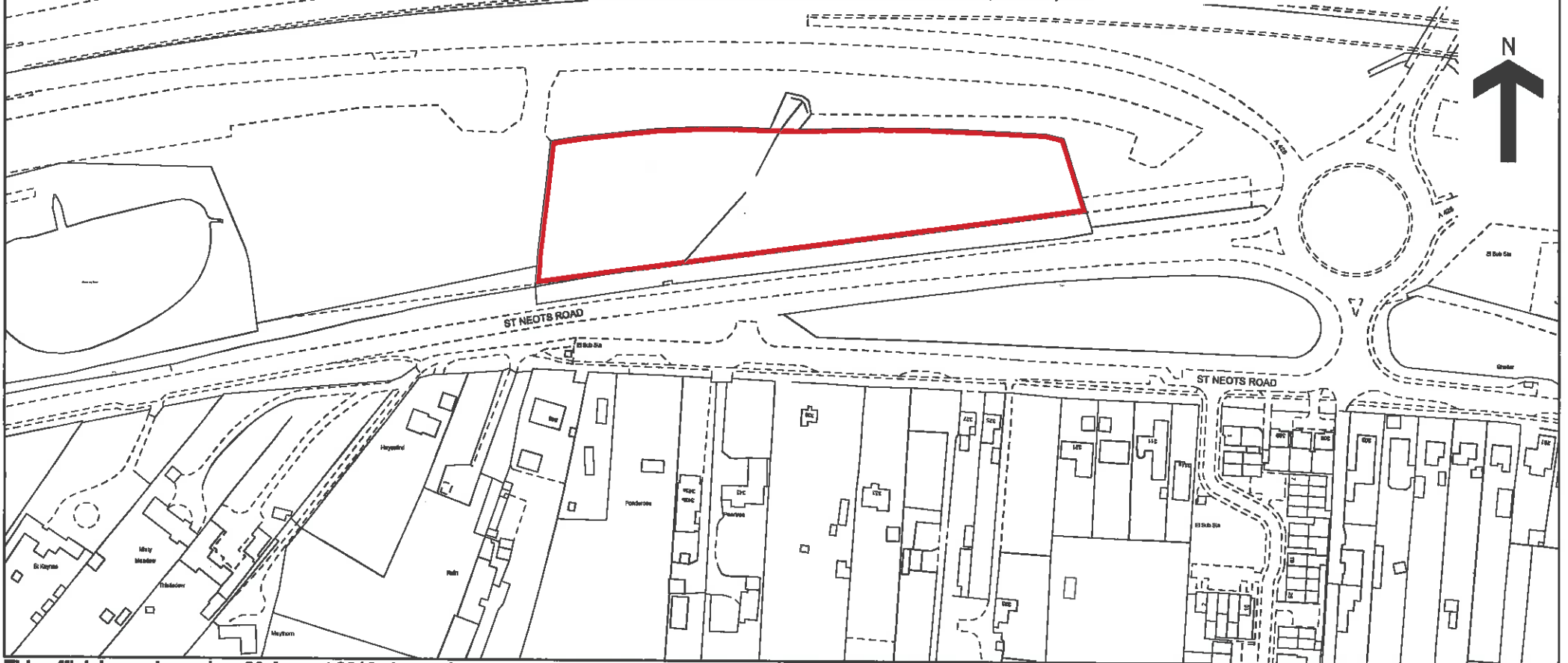


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