

Your ref: HELAA Site ID: 115388
Our ref: Grange Farm, Girton
DD: [REDACTED]
E: [REDACTED]
Date: 27/01/2026

Planning Policy
Greater Cambridge Planning
Via Email

Dear Sir / Madam

**RE: GRANGE FARM, GIRTON – GREATER CAMBRIDGE LOCAL PLAN REGULATION 18
CONSULTATION**

On behalf of our client, Hardwick Farming Company Limited (hereafter “HFC”), we are responding to the Regulation 18 consultation on the emerging Greater Cambridge Local Plan (hereafter “the Plan”). This representation considers HFC’s land interests at Grange Farm, Girton (the “Site”) (HELAA Site ID: 115388) as shown at **Appendix 1**.

Bidwells has been promoting this Site via the Local Plan on behalf of Chivers Farms Ltd for several years for employment development and have the following observations to make regarding the proposed uses of the Site following the release of updated evidence bases. Further, we are seeking to address the scores assigned to the Site in the Housing and Economic Land Availability Assessment (HELAA) 2025.

Proposed Employment Uses and the Updated Local Plan Evidence Base

Whilst the Site was first promoted for local employment opportunities recognising the strategic location close to the city and strategic road network, the Council now give greater recognition of the demand for industrial and logistics warehouse space across Greater Cambridge.

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



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Table 6.4 Indicative land requirements by type and location

Type	Proportion of total	Floorspace (sq.m)	Unit sizes	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: Icen 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			40,000 (10 ha) reflecting limited positive balance	Cambridge commutable
Distribution B8	126,800	-6,390 net + 91,200 First Proposals	c.-200,490 (undersupply)	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				
Mid-tech B2/B8/E(g)	31,700	34,652 E(g)(iii)	+2,952 (marginal oversupply)	15,000* (5 ha)	Enhanced urban connectivity / urban fringe / science park proximity
Total	317,000	119,500	-197,538	197,000	

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 on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and accommodate occupiers that may look to take up warehouse space across Greater Cambridge.

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 Mayors¹ 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.

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 that mean it must be restricted to only one form of employment. Rather, it has qualities that mean it should be considered for a wide range of uses.

Housing and Economic Land Availability Assessment (HELAA) (2025) Response

The below sets out our response to the scores assigned to the Site in the 2025 HELAA regarding suitability, achievability and deliverability.

Suitability

MATTER	RESPONSE	CHIVERS SCORE
Adopted Development Plan	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
Flood Risk	We acknowledge that part of the Site lies within Flood Zone 3 (7%). However, the initial masterplan as provided at Appendix 2 demonstrates how development of the Site can easily design around this constraint, and in turn provide amenity space for future staff.	Green – upgraded score as whilst crudely the Site does contain areas of flood risk, they are easily designed around and would not impact development.

¹ 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](#)

MATTER	RESPONSE	CHIVERS SCORE
Landscape	No further comments.	Amber – No proposed change.
Biodiversity	No further comments.	Green – No proposed change.
Open Space	No further comments.	Green – No proposed change.
Historic Environment	No further comments.	Green – No proposed change.
Archaeology	No further comments.	Amber – No proposed change.
Accessibility	<p>The Council has currently scored the Site red. However, this fails to recognise the locational requirements of warehousing developments.</p> <p>The Council score the Site low as it has <i>'inadequate accessibility to key local services, transport, and employment opportunities.'</i></p> <p>Firstly, the proposal is for employment and therefore does not need access to employment. Secondly, the proposal being for warehousing (likely B8 last mile), access to the strategic road network is critical. These locational requirements are recognised in the current National Planning Policy Framework (NPPF) and the consultation version out for comment until March 2026.</p> <p>As such, the Council's comments need to be more nuanced in relation to different uses and their requirements which is not apparent in this review.</p>	Amber – increased score from red.
Site Access	<p>The Council has scored the Site red with no reason other than consultation is needed to take place. The HELAA methodology states that red will only be assigned to a site where there is no possibility of creating a safe access. This is clearly not the case, and that the Site is capable of being assigned amber with constraints overcome via development.</p> <p>HGV, LGV and main car access could be taken from the Dry Drayton Road roundabout and track widen as required. Whilst sustainable transport</p>	Amber – improved score from red.

MATTER	RESPONSE	CHIVERS SCORE
	access can be achieved via Girton along Washpit Lane.	
Highways	No further comments.	Green – No proposed change.
Noise, Vibration, Odour and Lighting	The Site currently scored as amber, however, as an employment site we do not believe that its location would require any specific mitigation or design considerations out of the ordinary and therefore the score improved to green.	Green – improved score from amber.
Air Quality	The Site was scored as red in 2021 as it was within an Air Quality Management Area (AQMA) and has not subsequently been reviewed by the Council in this regard. However, the AQMA appears to have been revoked in 2022 ² . As such, the Site could not be scored green in this regard.	Green – improved score from red.
Contaminated Land	No further comments.	Amber – No proposed change.
Overall Score	We have rescored the Site across the criteria in several ways. There are no red criteria that remain and as such it is clear that the Site is suitable for development, subject to necessary mitigation which is consistent with the planning process in general.	Green

Available

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

Achievability

We welcome the continued scoring of the Site as Green as it is clearly available to be delivered within 0-5 years with no legal impediments and will be economically viable.

Summary

The Site benefits from strong strategic road network access on the Cambridge fringe and is capable of delivering a range of employment uses, including small-scale warehousing units to serve several functions, which have been identified as being required by the Council in the Plan evidence base.

It also benefits from access into Girton which can be improved to deliver sustainable access for future staff via walking and cycling.

We have demonstrated how the scores within the HELAA can be improved upon and therefore making the Site a more attractive proposition to address identified need.

² [AQMA Details - DEFRA UK Air - GOV.UK](https://www.gov.uk/government/topics/air-quality)

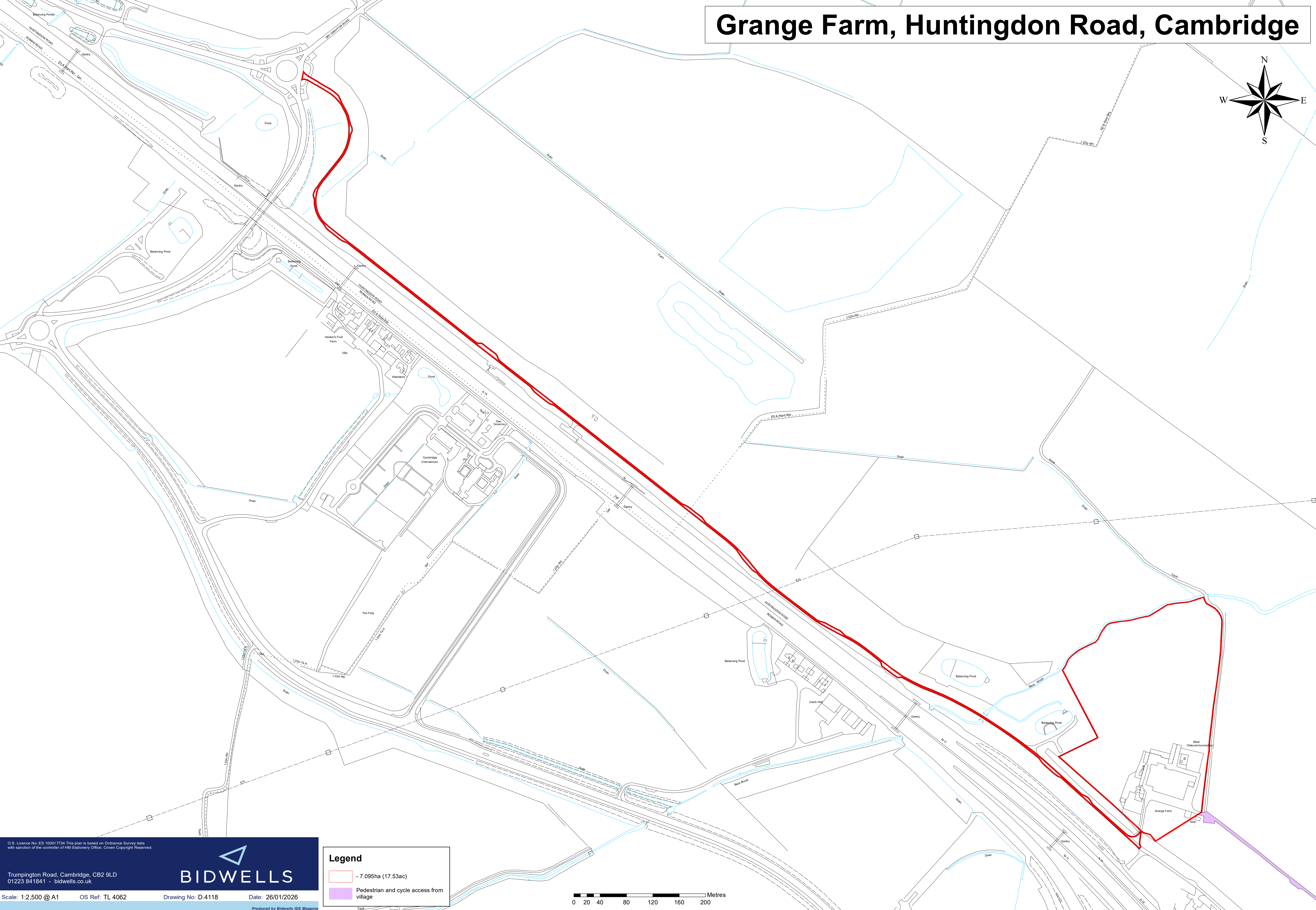
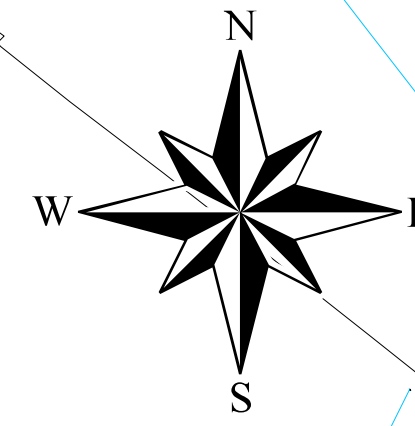
Grange Farm, Girton

Yours faithfully




Enclosures

Grange Farm, Huntingdon Road, Cambridge





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Scale: 1:2,500 @A1 OS Ref: TL 4062 Drawing No: D.4118 Date: 26/01/2026
Produced by Bidwells GIS Mapping

Legend

-  - 7.095ha (17.53ac)
-  Pedestrian and cycle access from village

