

## OAKINGTON & WESTWICK PARISH COUNCIL

### Response to the Cambridge 25 Additional Consultation Proposals for the Wider Site Masterplan

The recent “Additional Consultation” issued by the Cambridge 25 Project Team describes a development that appears, at first glance, highly attractive:

“Delivering sustainable and high-quality employment premises... structural landscaping and tree planting... community ‘hub’ facilities... public WC facilities in the nature park... extensive walking and cycling connections...”

It reads almost as an idyllic vision of green employment space integrated harmoniously into the local community.

However, behind this carefully curated presentation lies a development of a fundamentally different scale and character — one that poses serious and lasting risks to the communities of Oakington, Bar Hill, Dry Drayton, Longstanton and Northstowe, and to the wider Greater Cambridge region.

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#### 1. The True Nature and Scale of the Development

Cambridge 25 was originally described as approximately **123,000 square metres** of employment floor space — framed as:

- “a major new employment site”
- “employment floor space”
- “a high-quality employment park”

Such language naturally suggests an extension of business park office space — perhaps comparable in character to Oakington Business Park.

However, within a matter of months, the proposal has expanded dramatically to approximately 240,000 square metres — nearly doubling in scale. More significantly, its core purpose has become clearer.

The development is, in substance, not primarily an “employment park” but:

- A large-scale road freight terminal
- A warehousing and distribution centre
- A logistics hub of regional or national scale

Potential occupiers would logically include major distribution operators such as Royal Mail, Tesco, Amazon, IKEA and similar corporations.

This purpose is implicitly acknowledged in the consultation materials, where it refers to:

“providing large HGV yards with significant HGV parking bays... and space for drivers to park up/rest in addition to spaces for vehicles delivering/collecting.”

This is not ancillary infrastructure. It is central to the scheme.

The Parish Council considers it deeply concerning that the true logistical function of the site is not stated plainly and prominently. The language used throughout the consultation document risks obscuring the primary operational reality of the development.

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## **2. Our Position: We Support Sustainable Growth — But Not in This Location**

Oakington & Westwick Parish Council supports the principle that:

“The success of the Cambridge economy... means more demand from companies for additional logistics and business space.”

We do not oppose economic growth.

We do not oppose logistics infrastructure.

We do not deny the need for distribution capacity within Greater Cambridge.

Our objection is specific and principled:

### **The chosen location is fundamentally unsuitable.**

It fails on two essential grounds:

1. Inadequate strategic highway access for the volume of HGV traffic proposed
2. Failure to meet the sustainability imperatives required by national policy

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## **3. Major Concern 1: HGV Access to Strategic Road Infrastructure**

The consultation states:

“The site’s location is key to its connectivity – close to Cambridge, directly off the A14 and A1307...”

This assertion is misleading.

### **a) Access to the A14**

Access is not “directly off the A14.”

The site connects via two traffic-light-controlled junctions on the A1307 local service road — infrastructure designed for local passenger traffic, not sustained high-frequency HGV flows.

Both junctions would require significant redesign to accommodate the projected freight volumes. While there is a brief acknowledgement of access challenges within the consultation material, there is no clear commitment that these substantial infrastructure upgrades form part of the development proposal.

Without comprehensive redesign, congestion, safety risks and environmental degradation are inevitable.

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### **b) Access to the A428 and the Oxford–Cambridge Growth Corridor**

The Oxford–Cambridge Growth Corridor (often referred to as the OxCam Arc) represents a nationally significant economic strategy, supported by:

- Investment in East-West Rail
- Improvements to the A428
- Government ambition to create “Europe’s Silicon Valley”

Yet there are no known plans to redesign the A14 Girton Interchange in a way that would safely accommodate large-scale HGV movements between Cambridge 25 and the A428 westbound corridor. Current routes via Dry Drayton and Maddingly are entirely unsuitable for sustained HGV freight traffic.

In effect, the site is not properly integrated into the strategic freight network.

### **c) Impact of Local Traffic**

Besides the problems raised above, the proposed warehouse development would lead to an inevitable increase in traffic on the roads running through Oakington and Dry Drayton, as vehicles used by employees, visitors and delivery lorries traverse these roads to access the site. In particular there would be a very significant increase in the use of Dry Drayton Road, an unclassified road with a poor surface which is already under strain and dangerous.

Further, there are no provisions included for public transport or non-vehicle access to the site, despite references to transport interchange.

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## **4. Major Concern 2: Sustainability and National Policy**

The consultation references the National Planning Policy Framework (NPPF), which supports sustainable economic growth.

## ATTACHMENT 1.

### ENVIRONMENTAL ADVANTAGES OF RAIL TRANSPORT COMPARED TO ROAD TRANSPORT

In England, transporting goods by rail is significantly more environmentally friendly than by road across almost every metric, including carbon emissions, air quality, and infrastructure efficiency. While road haulage is modernizing, the fundamental physics of "steel on steel" gives rail a natural advantage in energy efficiency.

#### **Comparison: A Freight Train vs. a Fleet of Lorries**

To understand the scale of the impact, let's look at a typical **jumbo goods train** compared to the **Heavy Goods Vehicles (HGVs)** required to carry the same load.

Feature	Typical Freight Train	Equivalent Road Fleet
<b>Capacity</b>	~1,000 to 1,500 tonnes	<b>76 to 129 HGVs</b>
<b>CO<sub>2</sub> Emissions</b>	~26g per tonne-km	<b>~100-150g</b> per tonne-km
<b>Fuel Efficiency</b>	1 litre of fuel moves 1 tonne for <b>246 km</b>	1 litre moves 1 tonne for <b>~60-80 km</b>
<b>Road Impact</b>	Zero (on dedicated tracks)	Replaces <b>~1 mile</b> of motorway traffic

#### **1. Carbon Emissions (The Greenhouse Effect)**

According to 2024–2026 UK rail data, rail freight produces **76% less CO<sub>2</sub>e per tonne-km** than road transport.

- **The "One Train" Factor:** A single intermodal train (carrying shipping containers) can remove up to **129 lorries** from the M1 or M6 motorways.
- **Decarbonization Path:** Rail is currently the only way to move heavy goods using **existing electric technology** (overhead lines). While electric lorries are entering the market, they face challenges with battery weight and charging infrastructure for long-haul "trunking" that rail does not.

#### **2. Air Quality and Particulates**

Air pollution is measured by Nitrogen Oxides (NO<sub>x</sub>) and Particulate Matter (PM<sub>{2.5}</sub> and PM<sub>{10}</sub>).

- **Exhaust Emissions:** Modern Euro VI lorries are very clean, but a single train engine replaces dozens of individual HGV exhausts, concentrating emissions away from densely populated roadside areas.
- **Non-Exhaust Emissions:** A significant portion of road pollution comes from **tyre and brake wear**. Because trains use steel wheels on steel rails, they generate significantly fewer micro-particulates compared to the rubber tyres of a 44-tonne HGV.

### 3. Energy Physics and Efficiency

The environmental "win" for rail is rooted in physics. The **rolling resistance** of a steel wheel on a steel rail is roughly **one-tenth** that of a rubber tyre on tarmac.

- **Energy Recovery:** Electric trains can use **regenerative braking**, feeding electricity back into the grid when they slow down. While some electric HGVs can do this, the sheer mass and momentum of a freight train make it far more efficient at a macro level.

### 4. Infrastructure and Land Use

- **Space Efficiency:** A double-track railway can carry the same volume of freight as a ten-lane motorway but occupies a fraction of the land.
- **Noise Pollution:** While trains are loud, they are intermittent. A motorway creates a **constant "noise floor"** that disrupts local wildlife and human health 24/7. Rail freight often utilizes night-time paths when passenger demand is low, minimizing the impact on active human environments.

### 5. Safety and Societal Impact

Beyond direct "green" metrics, the environmental health of a country includes safety:

- **Accident Reduction:** Moving freight to rail reduces road congestion and the associated risk of accidents. Statistically, rail is over **20 times safer** per tonne-mile than road transport.
- **Road Maintenance:** Heavy lorries cause the vast majority of "wear and tear" on England's roads. Reducing HGV traffic lowers the environmental cost of constant road resurfacing and the carbon-heavy production of bitumen/asphalt.

## ATTACHMENT 2.

### An example of specific carbon savings for a particular route, such as the "Logistics Golden Triangle" in the Midlands to the Port of Felixstowe?

In the UK, the **Felixstowe to Midlands** corridor is the most critical freight artery, linking the country's busiest container port to the "**Logistics Golden Triangle**" (the area between the M1, M6, and M69).

Moving goods along this specific route by rail rather than the A14/M6 provides a stark environmental contrast.

#### THE EXAMPLE:

#### Felixstowe To Daventry International Rail Freight Terminal (DIRFT)

DIRFT is a large rail-road intermodal freight terminal and associated warehousing estate located in Northamptonshire at the junctions of the M1 motorway, A5, and A428 roads. It is one of the UK's most significant logistics hubs, home to major companies like Royal Mail, Tesco, and Dunelm.

**Distance:** ~128 miles (206 km)

**The Load:** 60 shipping containers (TEUs)

Metric	One Freight Train	Fleet of 60 Lorries (HGVs)
Fuel Used	~900 Litres (Diesel)	~3,600 Litres (Diesel)
Carbon Emissions (CO <sub>2</sub> )	~2.4 Tonnes	~9.5 Tonnes
"Lorry Miles" Avoided	7,680 miles	0
Air Pollution (NOx)	Concentrated away from towns	Released at kerbside in towns

#### 1. Carbon Footprint (CO<sub>2</sub>)

Rail freight on this route typically reduces carbon emissions by **76%** compared to road.

- **The "Jumbo" Effect:** Rail operators now run "Jumbo" trains from Felixstowe that are up to 775 meters long. A single one of these journeys replaces **up to 129 HGV movements**.

- **Future-Proofing:** While many freight locomotives on this route are still diesel (Class 66s), the introduction of **Class 99 bi-mode locomotives** (starting in 2025/26) will allow trains to run on zero-carbon electricity for the electrified portions of the journey, potentially pushing carbon savings toward **90%+**.

## 2. Air Quality (NOx and Particulates)

The A14 is a notorious bottleneck where idling lorries release Nitrogen Oxides directly into local communities like Ipswich, Cambridge, and Kettering.

- **Physical Dislocation:** Trains generally travel through cuttings or rural corridors. Emissions are released higher up and further away from pedestrians.
- **Brake & Tyre Wear:** Heavy HGVs generate significant "non-exhaust emissions" from rubber tyres grinding on tarmac. Trains use steel wheels on steel rails, which produces up to **10 times less particulate matter** ( $PM_{2.5}$ ) per tonne of cargo.

## 3. Road Congestion and Infrastructure

The Felixstowe-to-Midlands rail line removes approximately **1 million lorry journeys** per year from the A14 and M6.

- **Social Impact:** This reduces traffic "stress" for commuters and decreases the frequency of road accidents.
- **Taxpayer Savings:** One HGV causes as much wear to the road surface as **10,000 cars**. By moving containers to rail, the government saves millions in road resurfacing costs—a carbon-intensive process involving bitumen and heavy machinery.

## 4. Energy Efficiency (The Physics)

The "Steel on Steel" advantage means that a train is inherently more efficient. To move the same 1,500-tonne load:

- **Road:** Requires 60 individual engines fighting wind resistance and the high friction of rubber tyres.
- **Rail:** Requires 1 engine. Once a train reaches cruising speed, its momentum and low rolling resistance allow it to "coast" with minimal energy input compared to a stop-start motorway environment.

### ATTACHMENT 3.

#### Example of Cambridge 25 development relocating to a place with direct access to a railway line

##### Assumptions

That Cambridge 25 development is relocated to a similar size agricultural area, south of **Waterbeach** and west of Clayhithe, flanked by the A10 on its west side and the railway line on its east side.

- **Approximate rail distance from DIRFT:** ~90 miles (145 km)
- **Rail CO<sub>2</sub> emissions per tonne-km:** ~26 g CO<sub>2</sub> (Office of Rail and Road data)
- **Road (HGV) CO<sub>2</sub> emissions per tonne-km:** ~125 g CO<sub>2</sub> (industry averages)
- **Typical 40-ft container weight (fully loaded):** ~30 tonnes

These are widely cited average figures; actual emissions vary with locomotive type, load, and electrification level.

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#### **Per Container (40 ft) on Waterbeach → DIRFT**

##### **Rail Freight Calculation**

- Distance: 145 km
- Weight: 30 tonnes
- CO<sub>2</sub> per tonne-km (rail): 26 g

CO<sub>2</sub> by rail  $\approx 26 \text{ g} \times 30 \text{ tonnes} \times 145 \text{ km} = \mathbf{113,100 \text{ g CO}_2} \approx \mathbf{113 \text{ kg CO}_2}$  per container by rail

##### **Road (HGV) Calculation**

- CO<sub>2</sub> per tonne-km (road): ~125 g

CO<sub>2</sub> by road  $\approx 125 \text{ g} \times 30 \text{ tonnes} \times 145 \text{ km} = \mathbf{543,750 \text{ g CO}_2} \approx \mathbf{544 \text{ kg CO}_2}$  per container by road

##### **Emission Reduction**

**Rail emits ~79% less CO<sub>2</sub> per container** than equivalent road haulage on this route:

**Rail: ~113 kg vs Road: ~544 kg CO<sub>2</sub> per container**  
**Saved ≈ 431 kg CO<sub>2</sub> per container** by using rail instead of HGV.

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### **Per Typical Freight Train on Waterbeach → DIRFT**

A standard UK intermodal freight train might carry ≈ **30 containers** (some carry more; figures up to 50+ are common). For a conservative and easily scalable estimate we'll use **30 containers**.

#### **Rail Train Total CO<sub>2</sub>**

- 30 containers × 113 kg CO<sub>2</sub> = **3,390 kg CO<sub>2</sub> ≈ 3.4 tonnes CO<sub>2</sub>** for the train's rail portion.

#### **Equivalent Road CO<sub>2</sub> (HGV Fleet)**

If each container were moved individually by road:

- 30 containers × 544 kg = **16,320 kg CO<sub>2</sub> ≈ 16.3 tonnes CO<sub>2</sub>** from the fleet of HGVs.

#### **Total Savings**

Difference = **16.3 t – 3.4 t = 12.9 tonnes CO<sub>2</sub> avoided** per train movement by choosing rail instead of road.

Equivalent to the emissions from ~30 long-haul HGV deliveries over the same route.

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### **Summary**

**For the ~90-mile Waterbeach → DIRFT rail route:**

#### **Per container:**

- Rail: **~113 kg CO<sub>2</sub>**
- Road (HGV): **~544 kg CO<sub>2</sub>**
- **~431 kg CO<sub>2</sub> saved per container** by rail

#### **Per average freight train (30 containers):**

- Rail: **~3.4 tonnes CO<sub>2</sub>**
- Road: **~16.3 tonnes CO<sub>2</sub>**
- **~12.9 tonnes CO<sub>2</sub> avoided** per trip

## ATTACHMENT 4.

### TRAFFIC IMPACT

Attached is a reasoned, evidence-based estimate of the additional heavy goods vehicle (HGV) traffic that very large warehousing and distribution developments *along the A14 corridor* like Cambridge 25 could generate, based on similar logistics sites and transport assessment data.

#### 1. Baseline A14 HGV Traffic Today

The A14 is already a major strategic freight route between Cambridge and Huntingdon:

- Typical HGV counts are around **2,500–3,000 HGVs per day per direction.**
- In busier segments, flows can reach **~5,000 HGVs per day per direction.**

This represents existing freight serving ports, distribution hubs, and long-haul flows.

#### 2. Estimated HGV Generation from Large Logistics Parks

Transport planning studies for similar warehousing and distribution developments show HGV trip generation is substantial and scales with site size:

##### Example from a Logistics Trips Study

For purely road-based warehousing sites (without rail):

**Daily HGV trips by site size (before assumptions include local movements):**

##### **Site size (sq ft) Daily Two-way HGV Trips (base)**

750,000 sq ft	~520 HGV movements
1,000,000 sq ft	~693 HGV movements
1,500,000 sq ft	~1,040 HGV movements
2,000,000 sq ft	~1,386 HGV movements
2,500,000 sq ft	~1,733 HGV movements
3,000,000 sq ft	~2,079 HGV movements
4,000,000 sq ft	~2,772 HGV movements

### Site size (sq ft) Daily Two-way HGV Trips (base)

*(These figures form the basis of traffic modelling used in UK planning assessments and are derived from the TRICS database/transport assessments.)*

### 3. How That Relates to Cambridge 25

At ~240,000 m<sup>2</sup> (≈2.58 million sq. ft), Cambridge 25 lies in the scale band where this modelling predicts: **~1,700–2,000 HGV trips per day** once fully occupied.

(This assumes road-only freight operations with no rail freight substitution.)

This spread increases peak directional flows on the A14, particularly near junctions closest to these developments.

### 4. Summary & Conclusions

Today, HGVs already make up a significant proportion of vehicles on the A14. Adding well over a thousand extra HGV movements per site increases **noise, diesel emissions, road wear, congestion and safety risks** on this already busy strategic freight corridor. 1,700–2,000 additional HGV movements per day equals:

- ~70–85 extra HGVs per hour (assuming 24-hour operation)
- Much higher volumes during peak logistics windows
- Concentrated flows at specific junctions
- Increased congestion at junctions
- More noise for nearby communities
- Higher diesel emissions and particulate pollution
- Greater road surface wear and maintenance costs
- Increased accident exposure risk
- Higher cumulative carbon emissions

Rail-integrated logistics hubs typically reduce long-haul HGV traffic significantly.

Without rail connectivity, these developments:

- Lock the region into road-dependent freight
- Increase long-term environmental impact
- Conflict with national carbon reduction commitments

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## **Cambridge 25 Consultation Response – Betterment / Planning Gain (Addendum)**

Residents of Oakington and Westwick recognise that development proposals north of Cambridge must deliver clear and measurable public benefits if they are to offset the significant impacts on local communities and the rural environment. The proposed large-scale warehouse and logistics development on greenfield land will fundamentally alter the character of the surrounding countryside and introduce substantial increases in traffic, noise and industrial activity.

Under the principles of the National Planning Policy Framework (NPPF), developments should mitigate adverse impacts, enhance the natural environment and promote sustainable transport. In line with these principles, and with guidance applied by the Greater Cambridge Shared Planning Service, the following measures should be secured through planning conditions and legally binding agreements.

### **Landscape buffers and noise mitigation**

The site is expected to operate on a 24-hour basis with frequent HGV movements. To mitigate noise and visual impacts on nearby communities, substantial woodland planting and landscaped earth bunds should be provided along site boundaries, particularly those facing Oakington and Westwick. These buffers should consist of multi-layered planting using mature or semi-mature trees to provide effective acoustic and visual screening, while also contributing to biodiversity enhancement in accordance with national policy.

### **Protection and enhancement of rural footpaths**

Existing rural footpaths around the site are valued for recreation and access to the countryside. The development risks significantly degrading these routes. As compensation, a network of high-quality replacement and enhanced footpaths should be created, including circular walking routes and improved connections to the wider countryside. These routes should be secured as permanent public rights of way rather than temporary permissive paths.

### **Improvements to Dry Drayton Road**

Dry Drayton Road is currently an unclassified rural road and is not designed to accommodate substantial increases in traffic associated with a major logistics development. Prior to any approval, a full structural and capacity assessment should be undertaken. Significant upgrades funded by the developer must be secured to ensure the road can safely accommodate additional traffic without compromising safety or residential amenity.

### **Cycle and pedestrian connectivity**

In line with national and local policy promoting sustainable transport, the development should provide safe, segregated cycle and pedestrian infrastructure. Dedicated routes should run parallel to Dry Drayton Road but be physically separated from vehicle traffic. These routes should connect the site to surrounding villages and link with existing cycling infrastructure on the A1307.

### **Country park governance and access**

The proposal refers to a new country park but provides insufficient detail regarding ownership, management and long-term maintenance. Prior to approval, the developer should provide a

legally binding management plan clarifying land ownership, governance arrangements, guaranteed public access and secure long-term funding for maintenance.

### **Flood mitigation and traffic modelling**

Given the scale of development on greenfield land, detailed modelling of flood risk and drainage is required, including clear proposals for Sustainable Drainage Systems. In addition, comprehensive traffic modelling should be undertaken to assess cumulative impacts, particularly in relation to growth in Northstowe and resulting pressures on Dry Drayton Road and surrounding rural roads.

These measures are essential to ensure that the development delivers genuine community benefit and complies with the requirements of the National Planning Policy Framework while protecting the character and amenity of surrounding villages.

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