

BRIEFING NOTE

Critical Appraisal of Transport and Planning Evidence

Application reference:	26/02534/OUT
Site:	Cambridge 25 — Land east of Junction 25 of the A14, between Bar Hill and Northstowe, South Cambridgeshire ("Slate Hall Farm")
Applicant:	Lolworth Developments Limited and Welney Farms Property Limited
Proposal:	Outline planning application for up to 230,000 m ² GIA of employment floorspace (Use Classes E(g), B2, B8) with ancillary community/amenity uses, nature park, biodiversity zone, service yards and parking, and formation of primary vehicular access (all matters reserved except access)
Documents reviewed:	Site-wide Framework Travel Plan (KMC Transport Planning, June 2026); Transport Assessment (KMC Transport Planning, June 2026); Planning Statement (Planning Prospects, June 2026)
Prepared for:	Oakington and Westwick Parish Council

Purpose of This Note

This briefing note has been prepared to assist Oakington and Westwick Parish Council in formulating a response to planning application 26/02534/OUT ("Cambridge 25"). It provides a critical appraisal of the three key supporting documents reviewed to date: the Site-wide Framework Travel Plan (SWFTP), the Transport Assessment (TA), and the Planning Statement. It identifies weaknesses, gaps, inconsistencies and evidential concerns that the Parish Council may wish to draw on in framing an objection, and highlights points of direct relevance to Oakington and Westwick specifically.

This note is not a substitute for independent legal or transport planning advice, and the Parish Council may wish to consider commissioning specialist input (particularly on highways/transport matters) before finalising its formal representation.

Executive Summary

The application is supported by a substantial suite of technical documents, but close reading reveals recurring patterns: mitigation that is proposed but not secured; assessment methodology that leans on generic or dated data; and a planning case that depends heavily on characterising adopted, restrictive local policy as "out of date". Several findings are of direct and specific relevance to Oakington and Westwick:

Findings of direct relevance to Oakington and Westwick

- The applicant's own Environmental Statement admits significant, unmitigated visual harm to users of Bridleway Oakington & Westwick 9, one of only two receptors (out of ~40 assessed) where residual harm remains significant after mitigation.
- 11% of staff trip distribution is assigned to "Oakington Road West", and a named junction (A1307 – Oakington Road Roundabout) is tested in the Transport Assessment, yet no HGV routing restriction, monitoring, or "lorry watch" scheme equivalent to that proposed for Dry Drayton has been proposed for Oakington.
- Foul drainage is proposed via private package treatment plants discharging directly into Oakington Brook rather than connection to the public sewer network — raising water quality and long-term management questions for a watercourse running through your area.
- A significant residual effect on a bat commuting corridor is also identified, even after mitigation.

Beyond these Oakington/Westwick-specific points, the wider evidence base contains structural weaknesses that go to the heart of whether the application should be considered acceptable in principle: mitigation for road safety and traffic capacity is not secured or timed; road safety data is internally inconsistent; trip generation relies on generic national averages because the actual occupier is unknown; and the policy case rests on the applicant's own contestable characterisation of adopted Local Plan policies as "out of date".

1. Site-wide Framework Travel Plan (SWFTP)

Prepared by KMC Transport Planning on behalf of the applicants, June 2026.

1.1 A logistics-dominated scheme with weak binding commitments for the dominant use

The application floorspace is split 10:90 between B2 (general industrial) and B8 (storage and distribution) uses — meaning roughly 207,000 sqm, the overwhelming majority of the scheme, is warehousing/logistics floorspace. Yet:

- Cycle parking for B8 uses is only "on merit" — there is no committed minimum number of cycle spaces for 90% of the floorspace. Only a 575-space minimum applies to the 10% B2 element.
- Car parking maximums allow up to 2,530 spaces across the site, of which 2,070 are attributable to B8 uses alone.
- Warehousing and distribution operations typically involve shift working (including early, late, and night shifts), a pattern the Travel Plan does not analyse against public transport availability.

1.2 Public transport service levels do not match a logistics workforce's likely hours

The Travel Plan's own bus service tables show significant gaps for shift-based travel patterns:

- Route 8 (linking to Papworth Everard/Boxworth) runs only 4 times on weekdays/Saturdays and not at all on Sundays.
- Route 5A (St Ives/Swavesey) is hourly and does not run at all on Sundays.
- Even the best-served route (Service 5) runs 05:05–23:57 on weekdays — not covering early shift starts (commonly 04:00–05:00 in distribution centres) or late/night shift finishes, nor any Sunday early/late travel.

1.3 A weak Accessibility Index score, partly dependent on an uncommitted bus stop

The BREEAM Accessibility Index (AI) score is 2.46 without a bus stop, rising only marginally to 2.47 with one (Table 2.5, Appendix A). This is a low score for a scheme marketed as "highly sustainable", and no benchmarking context is provided. Critically, the improved score depends on a proposed new bus stop on the A1307 that does not yet exist and is absent from the Travel Plan's own Action Plan (Table 7.1) of committed pre-occupation actions.

1.4 Outdated baseline and modest, self-monitored targets

The car mode-share reduction target is based on 2011 Census Journey-to-Work data — 15 years out of date at submission — and targets only an 8 percentage point reduction in car driver mode share over 5 years (80% to 72%), reviewed and monitored by the developer's own appointed Travel Plan Coordinator, with the baseline survey itself not conducted until after first occupation.

1.5 Substance deferred beyond the point of scrutiny

The document is explicit that it is a framework only: cycle parking beyond the minimum, car parking layouts, and the substantive "Full Travel Plans" that will actually govern day-to-day travel behaviour are all deferred to Reserved Matters and post-occupation stages, outside the scrutiny of this application.

1.6 Methodology and drafting quality

- Cycling accessibility to Cambridge is justified using the national average cycle trip duration (24 minutes, DfT 2024 statistics) rather than local, route-specific evidence.
- Key active travel routes to the north are described as becoming a "soft track" beyond a certain point — not a genuine all-weather, all-user connection.
- No capacity assessment is provided for the single NMU bridge over the A14, the primary walking/cycling link to Bar Hill's amenities and bus stops, despite the potential for concentrated shift-change pedestrian/cycle flows.
- The document contains internal drafting errors (a duplicated table numbered "Table 2.6" used for two different subjects; a cross-reference to a non-existent "Figure 3.3"), suggesting limited quality assurance.

2. Transport Assessment (TA)

Prepared by KMC Transport Planning on behalf of the applicants, June 2026.

2.1 HGV routing measures protect Dry Drayton but not Oakington

The TA proposes HGV routing controls (signage, an advocated access restriction, ANPR monitoring) focused entirely on preventing HGVs from routing through Dry Drayton. No equivalent control is proposed for Oakington, despite:

- 11% of staff trips being distributed via "Oakington Road West" — the third-highest single distribution route in the trip distribution table.
- A junction named "Junction 5 – A1307 – Oakington Road Roundabout" being explicitly tested in the capacity assessment, confirming Oakington Road carries development-generated traffic.

This asymmetry — protecting one village while leaving Oakington without comparable safeguards despite a documented traffic connection — is a strong, specific point for the Parish Council's objection.

2.2 Internally inconsistent road safety data, with a reassuring conclusion asserted rather than demonstrated

The collision data section states there were 67 collisions over the 5-year study period with 4 fatalities (para 3.8.2/3.8.5), but the Road Safety Summary two paragraphs later states "a total of 64 recorded PICs... Three fatal PICs were recorded" (para 3.8.9) — an unexplained discrepancy. Regardless of which figure is correct, this is a non-trivial road safety context onto which the development proposes to add 472 vehicle trips and up to 124 HGV movements in the same peak hour, yet the TA's conclusion of "no significant road safety issues" is asserted without any forward-looking risk analysis of how substantially increased HGV activity interacts with a road network that already has a fatal collision history.

2.3 Mitigation the scheme depends on is not secured, timed, or guaranteed

This is the most structurally significant weakness in the TA. Key points:

- Three junctions relied on to demonstrate "nil detriment" (Junctions 1A, 1B, and A14 Junction 25) are stated to be "predicted to operate beyond capacity in the future year scenario before development is added" — i.e. cumulative growth from Northstowe alone already overwhelms these junctions, before this application's traffic is even considered.
- Northstowe's own full build-out is forecast to generate 3,047 AM peak vehicle trips — more than six times Cambridge 25's 472 — meaning much of the junction capacity work this application leans on is arguably attributable to Northstowe, not Cambridge 25.
- Delivery of the relied-upon junction upgrades has explicitly "not yet been established" in terms of phasing, and is "subject to a Monitor and Manage strategy to ensure that they are absolutely needed" — meaning this mitigation could be delayed indefinitely pending monitoring data, while traffic impacts begin immediately upon occupation.
- The proposed Dry Drayton HGV restriction is "subject to approval from the relevant authorities" — not secured.
- Bus re-routing and shuttle bus provision are "subject to sign up from local bus operator[s]", and the shuttle bus is explicitly intended to become "self-sufficient" (i.e. potentially withdrawn once developer funding ends).

2.4 Trip generation relies on generic national data

Because the actual occupier(s) are unknown at outline stage, trip rates are drawn from the TRICS national database using generic warehousing/industrial comparators. This means the headline HGV trip figures (124 AM peak / 109 PM peak) are industry averages, not a robust reflection of what a confirmed 24/7 distribution operator would generate, including night-time and shift-change activity.

2.5 Walking, cycling and public transport impact assessment is superficial

Sections 8.2–8.4 (Walking, Cycling, Public Transport) total under a page combined and largely assert that existing infrastructure is "more than sufficient" without quantified capacity or demand analysis — including no assessment of whether the single NMU bridge over the A14 can handle concentrated shift-change pedestrian/cycle flows.

2.6 Same authorship as the Travel Plan

Both the Travel Plan and the Transport Assessment were prepared by the same consultant (KMC Transport Planning) for the applicant, sharing figures, site descriptions, and drafting-quality issues. The independent cross-checking a Parish Council might hope for between these two documents is largely absent.

3. Planning Statement

3.1 Admitted significant visual harm to Bridleway Oakington & Westwick 9

This is the single most important finding for the Parish Council. The Statement (reporting the Environmental Statement's landscape and visual conclusions) admits at paragraph 5.28:

"Users of bridleways Longstanton 10 (within the Site) and Oakington & Westwick 9 (adjacent to the Site's northern boundary) would experience close range views of the Proposed Development... it is assessed that the residual effects at these two receptors would remain significant in ES terms."

Out of nearly 40 visual receptors assessed across the whole scheme, only two suffer significant residual harm even after mitigation — and one carries your parish's name. **This is a concrete, ES-defined significant adverse effect specific to Oakington and Westwick and should anchor the Parish Council's landscape and visual objection,** notwithstanding the document's broader emphasis on how limited the scheme's visual effects supposedly are.

3.2 A significant residual effect on a bat commuting corridor

The ecology assessment identifies a single significant (at a local level) effect during the operational phase relating to a bat commuting corridor, remaining significant even after embedded mitigation is taken into account (para 5.21).

3.3 Foul drainage via private package treatment plants discharging into Oakington Brook

Rather than connecting to the public sewer network, the scheme proposes on-site package treatment plants discharging treated effluent directly into Oakington Brook (para 5.52), explicitly to avoid connection to Anglian Water's wastewater treatment works. No detail is provided on capacity, redundancy, monitoring, or long-term ownership/management responsibility for these plants serving what could ultimately be a multi-occupier site with thousands of workers. The Parish Council may wish to request further detail from the Environmental Statement's water resources chapter (Appendix 12.1) given Oakington Brook's proximity to your community.

3.4 The policy case rests on characterising adopted, restrictive policy as "out of date" — a contestable legal argument

The Statement's entire planning case for approval depends on persuading the Council that:

- Policy S/6 (development strategy) and Policy S/7 (development frameworks), which restrict development in this location, should carry reduced weight because they are said to be "out of date" (paras 6.10–6.11);
- Policy E/11 — which explicitly seeks to restrict large-scale warehousing and distribution centres in the district, and would otherwise be the most directly relevant restriction on this scheme — is characterised as "out of date" on the basis that it and its evidence base are approximately 10 years old (para 6.12).

This is the applicant's legal argument for why the Council should not apply its own adopted policy — not an agreed or neutral fact. An adopted Local Plan policy does not become legally "out of date" merely because a new plan is at an early stage of preparation, and the Parish Council, alongside the Council's own officers and legal advisors, is entitled to disagree with this characterisation and argue that these policies should be given full weight.

3.5 A likely internal tension in the applicant's own case

Having argued Policy E/11 is out of date, the Statement then also argues the scheme does not conflict with it anyway, relying on the policy's supporting text distinguishing developments meeting "local needs" (supported) from "large scale proposals serving a wider regional or national function" (not supported) (para 6.12). This sits uneasily alongside:

- The Transport Assessment's own justification for the site's suitability, which explicitly emphasises its immediate access to the A14, M11 and A1(M), and connectivity to Felixstowe, the Midlands, and London — the hallmarks of a strategic, national-scale logistics hub rather than a facility meeting purely local supply needs.

- The Statement's own promotional language describing the site as capitalising on "the A14 as a crucial but under-utilised asset" (para 6.47) — framing centred on regional/national logistics positioning, not parochial local demand.

The Parish Council may reasonably highlight that the applicant cannot credibly argue the site's value lies in serving wide regional/national logistics markets to justify need and location, while simultaneously arguing the scheme falls outside a policy restricting developments serving "a wider regional or national function".

3.6 Reliance on very early-stage emerging policy

The Statement confirms the site is not allocated in any adopted plan and relies substantially on a draft allocation at Regulation 18 stage of the emerging Greater Cambridge Local Plan (GCLP) — the earliest public consultation stage, before Regulation 19 (pre-submission) or examination. Under NPPF paragraph 48, the weight given to emerging policy depends on its stage of preparation and the extent of unresolved objections; at Regulation 18, that weight is properly very limited. The Parish Council may reasonably argue this application asks the Council to pre-empt a plan-making process that the community is entitled to influence through its normal stages.

3.7 Economic benefit is real but proportionally modest

Operational economic output is quantified at £117.1m GVA annually — equal to just 0.7% of Greater Cambridge's total GVA in 2031 (para 5.8, drawing on the Environmental Statement). This is rated "major beneficial" (significant) in ES terms, but a 0.7% contribution to sub-regional GVA is a modest, not transformative, effect, and the Parish Council may wish to question whether this significance rating is proportionate to the actual scale of benefit when weighed against the identified harms.

3.8 This application is a stepping stone to further, currently unassessed development

The Statement confirms the wider draft allocation includes further land (the remainder of Slate Hall Farm) not under the applicants' control, accessed via a track onto Dry Drayton Road, and that the Illustrative Masterplan is deliberately designed to facilitate that further parcel coming forward without prejudice (para 3.9). Granting permission here is expressly intended to enable a further phase of development on Dry Drayton Road access — a route the Transport Assessment separately identifies as requiring HGV restriction measures. The Parish Council should treat the cumulative, longer-term trajectory of this site as a live and relevant consideration, not a one-off decision.

4. Summary of Recommended Objection Points

The following is a consolidated list the Parish Council may wish to draw on directly in its formal representation. Points of specific relevance to Oakington and Westwick are marked.

Points of direct relevance to Oakington and Westwick

1. Admitted, unmitigated significant visual harm to users of Bridleway Oakington & Westwick 9 — one of only two receptors (of ~40 assessed) with residual significant harm.
2. 11% of staff trip distribution is routed via Oakington Road West, with a named Oakington Road Roundabout junction tested in the Transport Assessment, yet no HGV routing restriction or monitoring scheme equivalent to that proposed for Dry Drayton has been proposed for Oakington.
3. Foul drainage relies on private package treatment plants discharging directly into Oakington Brook rather than mains sewer connection, with no detail on capacity, redundancy, or long-term management.
4. A significant residual effect on a bat commuting corridor is identified even after mitigation.

Wider evidential and policy concerns

5. Mitigation the scheme depends on (junction upgrades, HGV restrictions, bus service changes) is not secured, timed, or guaranteed, and is explicitly contingent on third-party sign-off and an undefined "Monitor and Manage" process.

6. Road safety collision data is internally inconsistent (67 vs 64 collisions; 4 vs 3 fatalities), undermining confidence in the TA's reassuring safety conclusion.
7. Three key junctions are forecast to be over capacity from cumulative (largely Northstowe-driven) growth before this application's traffic is even added, meaning the scheme's "nil detriment" claim depends heavily on infrastructure attributable to other development.
8. Trip generation and HGV movement figures are based on generic national (TRICS) averages because the actual occupier and its operating hours are unknown at outline stage.
9. Active travel and public transport impact assessment in both the Travel Plan and Transport Assessment is superficial, with no quantified capacity testing of key pinch points such as the single NMU bridge over the A14.
10. The Travel Plan's own Accessibility Index score is modest and depends partly on an uncommitted new bus stop, absent from the Action Plan of committed pre-occupation measures.
11. The application's policy case depends on treating adopted, restrictive Local Plan policies (S/6, S/7, and particularly E/11, which restricts large-scale warehousing and distribution) as "out of date" — a contestable legal position, not settled fact.
12. The applicant's characterisation of the scheme as meeting only "local" need under Policy E/11 sits in tension with its own case that the site's value lies in serving wider regional/national logistics markets via the A14/M11/A1(M) corridor.
13. The application relies heavily on a draft allocation at the earliest (Regulation 18) stage of the emerging Local Plan, which should carry only very limited weight in decision-making at this stage.
14. The quantified economic benefit (0.7% of Greater Cambridge's GVA) appears modest relative to the "major beneficial" significance rating attached to it.
15. The application is designed to facilitate a further, currently unassessed phase of development on adjoining land accessed via Dry Drayton Road, meaning the cumulative long-term impact of the wider allocation should be considered now, not deferred.

5. Suggested Next Steps

- Consider requesting the Environmental Statement's water resources chapter (Appendix 12.1) and the ecology appendices (7.4, bat survey) for further detail on the Oakington Brook discharge proposal and the bat commuting corridor impact.
- Consider requesting Appendix I of the Transport Assessment (the SLR Consulting junction capacity technical note), which underlies the highways capacity conclusions but was not included in the main TA report reviewed here.
- Consider whether the Parish Council wishes to seek its own transport planning and/or planning policy advice to formalise the points above into a substantive representation, particularly regarding the Policy E/11 argument and the tilted balance analysis in the Planning Statement.
- Consider raising directly with the Local Planning Authority the absence of any HGV routing protection for Oakington equivalent to that proposed for Dry Drayton, and the reliance on the Oakington & Westwick 9 bridleway's admitted significant harm as a substantive landscape objection.

This note was prepared to assist the Parish Council's consideration of application 26/02534/OUT and reflects a critical reading of the three documents named on the cover page. It does not constitute legal or professional planning advice.

Re: Application 26/02534/OUT — Land east of Junction 25 of the A14, between Bar Hill and Northstowe ("Slate Hall Farm" / "Cambridge 25")

Objection

Oakington and Westwick Parish Council wishes to formally object to the above outline application. Having reviewed the Site-wide Framework Travel Plan, Transport Assessment and Planning Statement, the Council considers the application should be refused, or at minimum not determined until the matters below are properly addressed.

1. Admitted significant harm to Bridleway Oakington & Westwick 9

The applicant's own Environmental Statement (reported at Planning Statement para 5.28) confirms that users of Bridleway (Oakington & Westwick 9) will experience close-range views of the development, and that residual visual effects at this receptor remain significant even after mitigation. This is one of only two receptors, out of some 40 assessed, where significant harm is admitted to persist. The Council objects to this direct and unmitigated harm to a route bearing our parish's name.

2. No HGV protection for Oakington despite documented routing through it

The Transport Assessment shows 11% of staff trips distributed via Oakington Road West and separately tests the A1307/Oakington Road Roundabout junction, confirming development traffic will use this route. Yet HGV routing controls (signage, access restriction, ANPR monitoring) have been proposed only for Dry Drayton, with no equivalent safeguard for Oakington. This asymmetry is unjustified and should be addressed before any permission is considered.

3. Foul drainage into Oakington Brook

The scheme proposes private package treatment plants discharging directly into Oakington Brook rather than connecting to the public sewer network, with no detail provided on capacity, redundancy or long-term management responsibility for a facility potentially serving thousands of workers. The Council requests full disclosure of the water resources chapter (ES Appendix 12.1) before this aspect can be considered acceptable.

4. Unmitigated harm to a bat commuting corridor

The ecology assessment identifies a significant residual effect on a bat commuting corridor even after embedded mitigation, which the Council considers inadequately addressed at this stage.

5. Mitigation is not secured

Key mitigation the application relies upon junction capacity improvements, the Dry Drayton HGV restriction, and bus service provision is not secured, timed or guaranteed, and is contingent on third-party approvals and an undefined "Monitor and Manage" strategy.

Three junctions relied upon for a "nil detriment" conclusion are forecast to be over capacity from cumulative (largely Northstowe-driven) growth even before this development's traffic is added.

6. Unreliable evidence base

The Transport Assessment's collision data is internally inconsistent (67 vs. 64 collisions; 4 vs. 3 fatalities), undermining confidence in its conclusion of "no significant road safety issues," and trip/HGV generation figures rely on generic national averages rather than any confirmed occupier.

7. Policy case rests on a contestable characterisation of adopted policy

The application depends on treating adopted policies S/6, S/7 and E/11 — the latter specifically restricting large-scale warehousing and distribution as "out of date," while also relying on an emerging Local Plan allocation at the earliest (Regulation 18) stage, which should carry only limited weight. The Council does not accept that adopted policy should be so readily displaced.

Conclusion

For the reasons set out above and in particular the admitted harm to Bridleway Oakington & Westwick 9, the unaddressed HGV impact on Oakington Road, and the unresolved drainage and mitigation concerns Oakington and Westwick Parish Council objects to application 26/02534/OUT and requests that the Local Planning Authority refuse permission, or require these matters to be satisfactorily resolved before any decision is made.

Yours faithfully,

On behalf of Oakington and Westwick Parish Council