

# NEWLANDS DEVELOPMENTS

BRICKYARD FARM, BOXWORTH

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REPRESENTATIONS TO 'FIRST PROPOSALS'  
GREATER CAMBRIDGE LOCAL PLAN

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DECEMBER 2021

**AVISON  
YOUNG**

**newlands**  
developments

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**CHAPTER 1**  
*INTRODUCTION*

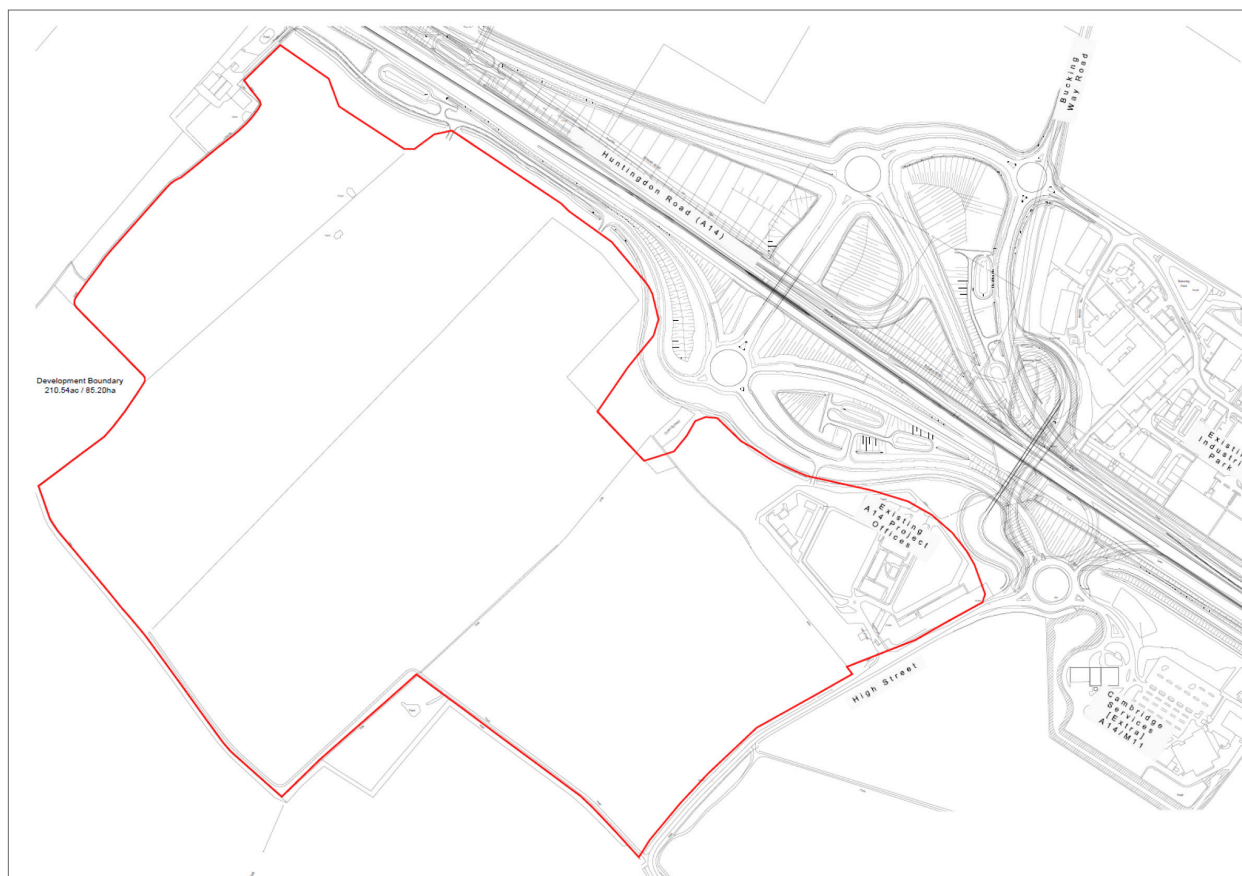
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## 1.0 INTRODUCTION

- 1.1. Avison Young ('AY') is instructed by Newlands Developments ('Newlands') to make representations to the First Proposals Greater Cambridge Local Plan.
- 1.2. Newlands was established in 2018 by three shareholding directors of Roxhill Developments who together controlled over 2,000 acres of land in strategic locations developing facilities for customers including Amazon, DHL, Howdens, Nestle, H&M, DPD, DSV, and Kuehne & Nagel. As a well-known and respected specialist industrial and logistics developer, Newlands has up-to-date experience and on-the-ground knowledge about the changing nature of and requirements for industrial, logistics and distribution within the UK and the compelling need for such facilities to be planned for in the formulation of emerging Local Plans in accordance with National Planning Policy Guidance.
- 1.3. Newlands have considerable experience and a first-class track record in meeting market demand for industrial and logistics floorspace.
- 1.4. Newlands is actively promoting the development of its land at Brickyard Farm, Boxworth for development comprising c.170,133sqm of Class B8 (warehousing and distribution) and Class E(g) ii) and iii) (research and development & light industrial) floorspace to meet both existing latent and projected future employment and logistics needs. It is also working with Chelveston Renewable Energy to develop a comprehensive scheme for on-site renewable energy generation with the ambition of achieving a truly sustainable development that meets its own power requirements through on site renewable energy and provides opportunities for surplus green energy to be put back onto the National Grid.
- 1.5. The proposals represent a significant opportunity for local economic growth on a suitable, available and achievable site which will deliver much-needed logistics floorspace. It will create a wide range of employment and training opportunities for a growing local population, support the economic recovery from COVID-19 and the Government's wider economic ambitions for the Region as a centre for prosperity.

### The Site

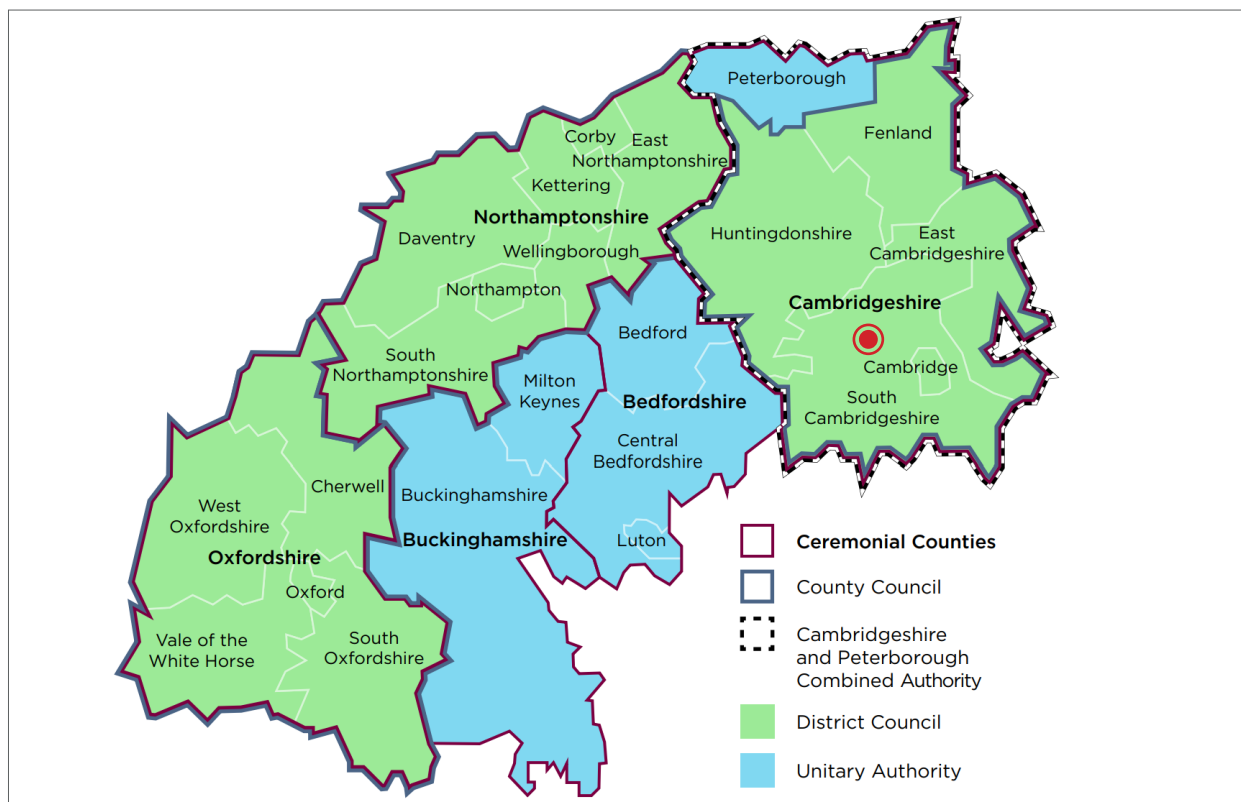
- 1.6. Brickyard Farm ('the Site') comprises an 85.2 ha non-Green Belt site adjacent to the A14 Swavesey junction (J24) which is primarily in agricultural use.
- 1.7. The north eastern part of the site is occupied by the A14 construction compound, on a temporary basis, and will be returned to its former condition when no longer needed and will not affect phased delivery of development at the site.
- 1.8. It is bound by agricultural land to the north west, borrow pits to the south-west (that were in use for construction work on the recently completed Highways England A14 Cambridge to Huntington Improvement Scheme), Boxworth Road to the southeast, and the A14 Swavesey Interchange complex and Cambridge Motorway Services to the north east.



**Figure 1.1 Brickyard Farm, Boxworth Location Plan**

- 1.9. The site is located south of Junction 14 of the A14, approximately 12km equidistant to Cambridge to the southeast and Huntingdon to the northwest. It is towards the eastern end of the Oxford-Cambridge Arc national economic priority area and within the UK Innovation Corridor. It is also approximately 7 kilometres from Northstowe New Town which is currently under construction and accessed via the A14.
- 1.10. The A14 is a vital road transport corridor between the East Midlands and East Anglia, and is of local, regional, national and international significance. This stretch represents an important strategic link for freight transport between the A1 and the M11 motorway and connects the ports in East Anglia with the Midlands and the rest of England.
- 1.11. According to Highways England, the A14 carries around 85,000 vehicles per day; 26% of this is HGV traffic (against the national average of 10%). In May 2020 Highways England completed a £1.5bn improvement scheme which upgrades 21 miles of the A14 and includes a major new bypass to the south of Huntingdon to improve the efficient movement of people and freight and support local and regional growth. On this basis, the site is in a prime location for provision of employment and logistics space to the west of Cambridge as acknowledged in the Council's own evidence<sup>1</sup>.

1 Greater Cambridge Partnership - Understanding demand for B8 premises across Greater Cambridge - Industry Engagement (June 2021)



**Figure 1.2 Approximate Site Location (red dot) in Regional 'Arc' Context**

### Emerging Proposals

- 1.12. A hybrid planning application is currently being prepared by Newlands for c. c.170,133sqm of employment development, including Class B8 (storage and distribution) uses and E(g) ii) & iii) (research and development and light industrial) uses. A renewable energy park and associated infrastructure is also proposed on the site.
- 1.13. Newlands is aiming for an application to be submitted to the Local Planning Authority in H2 2022 following pre-application engagement, public consultation and EIA Screening early next year.
- 1.14. At this stage, it is anticipated that outline planning permission will be sought for the quantum of employment floorspace with details of the appearance, layout and scale of individual buildings and development plots to be dealt with through the approval of reserved matters on a phased basis. Detailed planning permission will be sought for key infrastructure including the access road, creation of development plateaus and the renewable energy generation proposals or 'renewable energy park'.
- 1.15. It is anticipated that the outline element of the application will be accompanied by an Illustrative Masterplan, an Indicative Phasing Plan and a number of Parameter Plans, which will control the form and extent of new development on site and ensure it sits within a sympathetic network of green infrastructure that allows the scheme to integrate into the wider landscape.
- 1.16. A suite of detailed and robust technical and environmental reports is being prepared for submission with the application to ensure that any impacts of development are suitably mitigated.
- 1.17. An emerging draft Parameter Plan, based on the technical and masterplanning work undertaken to date, is enclosed with these representations. This shows the location of a series of potential development zones, the anticipated uses within each zone and potential floorspace to be created. It envisages that a 'renewable energy park' (including solar arrays) would be located in the north west of the site with employment development located to the south east. It shows development accessed from a new roundabout junction on Boxworth Road.

- 1.18. The developable areas of the site are transected by an existing gas main which is to be retained. Otherwise, the developable area of the site is defined by extensive proposals for structural and strategic landscaping and Green Infrastructure, including SUDs features, which will ensure that the development integrates appropriately into the character of the surrounding area.



Figure 1.3 Draft Parameter Plan

**Purpose and Structure of Representations**

- 1.19. The Site has been promoted by Newlands through the previous ‘Call for Sites’ process and has been assessed by the Councils as part of the evidence for the emerging Local Plan. It is identified by the Councils as both available and achievable for significant employment development but raises questions regarding its suitability, which these representations seek to address.
- 1.20. The purpose of these representations is, therefore, to comment on the soundness of the Council’s proposed approach to planning for employment land within Greater Cambridge and the evidence base underpinning it.
- 1.21. In particular, these representations seek to demonstrate that the Council’s approach in Policy S/JH considerably underestimates and fails to meet the need for employment floorspace, particularly Class B8 logistics floorspace in Greater Cambridge, and that the proposed Policy J/NE restriction on the provision of large-scale regional and national warehousing and distribution within the area is contrary to economic trends, market evidence and the scale of economic ambition for the Region.
- 1.22. In this context, these representations promote the Site as a suitable extension to the proposed allocation of land to the south of the A14 services, that would contribute towards latent and future industrial and logistics needs, including delivering much-needed warehousing that would support other key economic sectors in Greater Cambridge and a growing population with ever increasing demands for e-commerce.

1.23. These representations are structured as follows:

- **Section 2** - sets out the strategic opportunity and need for additional employment land including large-scale logistics space in Greater Cambridge, having regard to the changing nature of business requirements in the national/regional/local context. It also comments on the soundness of draft Local Plan Policy J/NE, which sets out a presumption against large-scale national and regional warehousing and distribution centres in Greater Cambridge.
- **Section 3** - describes the unique nature of the site as an opportunity to stimulate economic growth and attract further investment. It highlights the particular economic, social and environmental benefits that would be delivered by the application, demonstrates its suitability and that the site should be identified as an allocation for industrial and logistics uses in the emerging Local Plan.



# NEWLANDS DEVELOPMENTS

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## CHAPTER 2

*THE STRATEGIC OPPORTUNITY AND NEED*

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## 2.0 THE STRATEGIC OPPORTUNITY AND NEED

- 2.1. The starting point for understanding both the economic opportunity for growth, and the need to provide additional land to accommodate additional industrial and logistics floorspace in Greater Cambridge, for the purpose of both plan-making and decision-taking, is to consider recent economic trends which are driving growth, and the existing and emerging policy context at a national, regional and local level.
- 2.2. This section sets out the national, regional and local context affecting the industrial and logistics market and the important role it plays in economic growth and prosperity. It considers recent economic trends and why these demonstrate the need for a different approach to planning for economic growth in Greater Cambridge: namely the allocation of additional employment sites and land for large-scale warehousing floorspace to meet identified needs. It then goes on to provide a critique of the Council's employment evidence and comment on the proposed Local Plan policy approach.

### National Context

- 2.3. The logistics and distribution sector is a major contributor to the UK economy, employing over 2.7 million people and contributing over £124bn of GVA -10% of the UK's total economic output. It underpins how our economy and society functions –delivering component parts to businesses, stock to shops, supplies to hospitals and products directly to our homes. However, land supply has not kept pace with demand and now acts as a major barrier to growth and prosperity.
- 2.4. Recognising the critical role that logistics has in supporting the national economy, the Government asked the National Infrastructure Commission (NIC) for advice on how to tackle various industry issues whilst continuing to support UK growth. The result was NIC's 'Better Delivery: The Challenge for Freight' report which was published in April 2019. The report states that whilst the availability of land for freight distribution centres and other infrastructure is crucial for the efficient operation of the sector, it is often a forgotten element of spatial planning, resulting in a system with insufficient, or sub optimally located space from which to run efficient and low congestion operations. It states that locating depots and warehouses in places which minimise the distance from the distribution point to the first delivery address allows for the more intensive, optimised use of vehicles and confirms that the most effective way of managing freight's impacts on congestion, while allowing efficient operations, is by planning for the needs of freight at an early stage of statutory planning processes.
- 2.5. The report made a number of recommendations in this regard, including providing and protecting sufficient land/ floorspace for storage and distribution activities on the basis of population and economic need, with particular consideration for the floorspace requirements for last mile distribution and consolidation centres, and supporting the clustering of related activities within a supply chain: minimising the distance that goods must be moved and maximising the potential for efficient operations.
- 2.6. In response, the Government has updated the NPPG to specifically recognise the importance of the freight system in plan-making. The NPPG now recognises that

**“the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)”**

(Paragraph: 031 Reference ID: 2a-031-20190722).

- 2.7. It goes on to state that identification of need can be informed by
- engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
  - analysis of market signals, including trends in take-up and the availability of logistics land and floorspace across the relevant market geographies;
  - analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and
  - engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.

## COVID-19

- 2.8. The COVID-19 pandemic has fundamentally changed the way that the UK population and economy operates and has rapidly accelerated trends that have been slowly shifting business and consumer behaviour over the last few years. Even before the onset of the pandemic, the UK had one of the highest levels of online expenditure in the world, with 19% of all expenditure happening online in 2019.
- 2.9. The lockdowns associated with COVID-19 have accelerated this trend, resulting in a rapid increase in online sales. According to the ONS, internet sales as a percentage of total retail sales rose to 28% in 2020<sup>2</sup>. It is expected this trend will continue over the coming years as people have become accustomed to doing more of their shopping online, with forecasts by Experian (October 2020) indicating that online sales could reach at least 30% of total retail sales in 2027, and 35% by 2040. This continued growth will drive further need for space.
- 2.10. As online sales have grown, demand for large distribution space has increased. An 80% growth in online grocery shopping has seen food retailers significantly expand their distribution capacity. Reports from CoStar suggest this increase could create demand for an additional 7.1 million sqft of warehouse space to 2024. As non-food retail has also grown online third party logistics (3PL) operators have also been a major driver of demand as they seek space to ensure online purchases are delivered directly to consumers quickly.

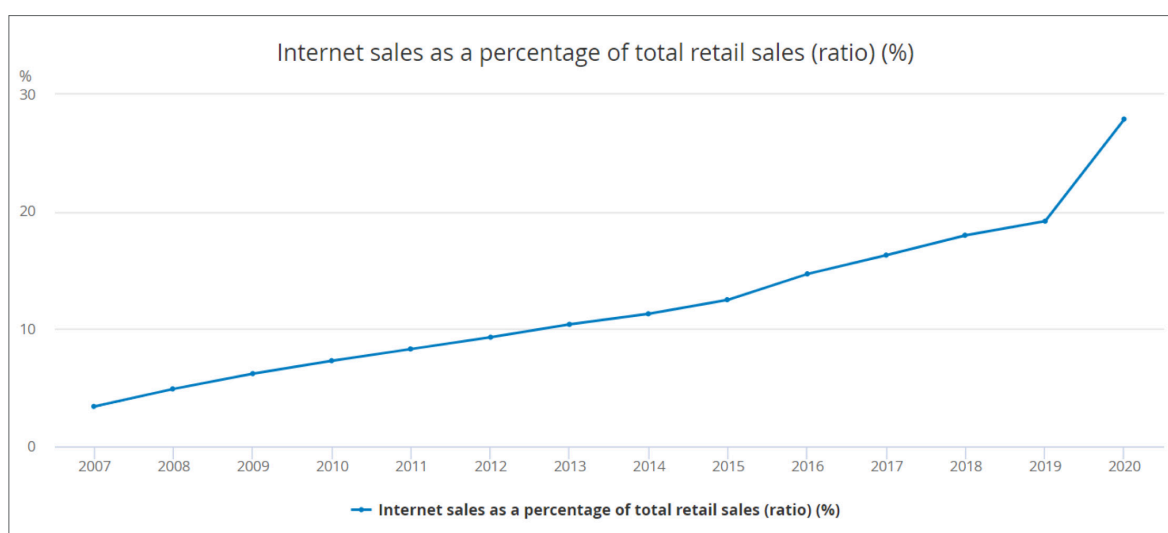


Figure 2.1 Internet Sales as a percentage of total retail sales

2 Internet sales as a percentage of total retail sales. Office for National Statistics (August 2021) <https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>

- 2.11. On the basis that for every extra £1bn spent online, a further 1million sqft of warehouse space is needed to meet the new demand, market advice suggests that by 2030 there could be a need for an additional 100million sqft of warehouse space across the UK<sup>3</sup>. This has affected the occupier profile of warehouses in recent years, with online retailers increasing their warehouse occupancy by 614% from 2015<sup>4</sup>.
- 2.12. Other recent research by Turley suggests that at least 73sq ft of warehouse floorspace is needed per home in the UK to meet consumer demand<sup>5</sup>. It is noted that this figure does not account for geographical differences and is, therefore, likely to be an underestimation of real demand, particularly in the Greater Cambridge area where demand has also been compounded by a historic policy restriction on logistics space which has hampered supply.
- 2.13. All elements of the industrial / logistics market have been challenged by the need to operate within social distance guidelines (making space less productive) and also increased stock storage requirements – either through mounting backlogs or a desire to hold more contingency stock. Although legal requirements on social distancing have now been relaxed, the continued application of social distancing measures is likely to leave a legacy in terms of building design. Many businesses continue to apply their own guidelines and continue to encourage various social distancing measures to ensure safety of their employees, requiring additional space. This will, in turn, mean an increased need for new stock that can meet contemporary needs of occupiers and their staff.

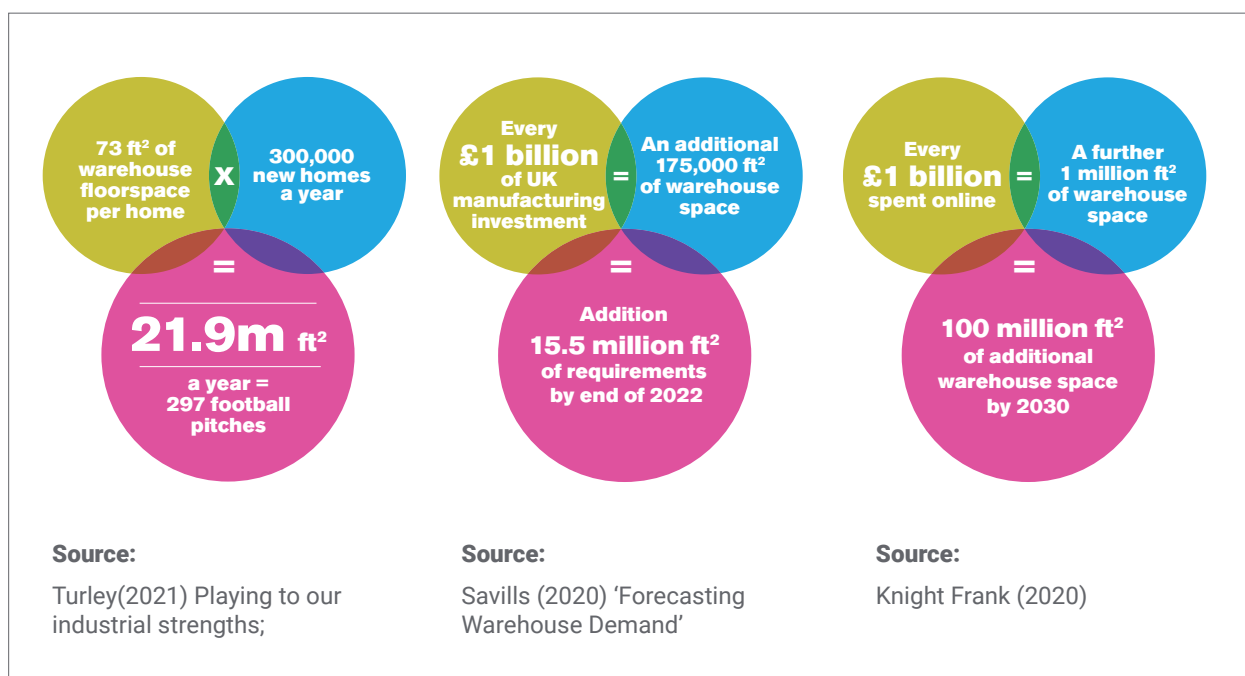


Figure 2.2 Translating Growth to Warehouse Need

### Building Back Better

- 2.14. At a national level, the Government has set out its national strategy for how to 'Build Back Better'<sup>6</sup> in response to the COVID-19 pandemic and recent challenges that the economy has faced. This sets out plans to support economic growth through significant investment in infrastructure, skills and innovation and support for high-growth businesses that make a significant contribution to employment and allow technology and best practice to diffuse through the economy to the benefit of all.

3 The size and make-up of the UK warehousing sector – 2021. Savills (June 2021) <https://pdf.euro.savills.co.uk/uk/commercial---other/uk-warehousing-sector---2021.pdf>

4 ibid.

5 Playing to Our Strengths Turley (2021)

6 Build Back Better: our plan for growth. HM Treasury Policy Paper (March 2021)

<https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>

- 2.15. Indeed the former Business Secretary, Alok Sharma has, for example, publicly supported the provision of jobs and investment in the warehousing and distribution sector and its important role in building back better from the pandemic<sup>7</sup>. Former Prime Minister Gordon Brown has also set out his support for the important role of training in sectors, including logistics in tackling youth employment arising from the COVID-19 pandemic<sup>8</sup>. Furthermore recent decisions issued by the Secretary of State confirm that the Government considers that very substantial weight may be afforded to the need for employment land and economic benefits of logistics development in terms of their job creation and other economic benefits, including addressing local needs and specific locational requirements in the logistics sector<sup>9</sup>.
- 2.16. The Build Back Better agenda makes reference to a number of high-profile “pathfinder projects” which will be central to delivering the economic growth envisaged. This includes projects at a regional scale such as the Oxford-Cambridge Arc, which is discussed in further detail below.
- 2.17. In addition to the Government’s ambitions to ‘build back better’ and for the UK to become a hub of innovation that supports the creation and growth of businesses, there have been other major economic shifts in the UK in recent years, which should be central to planning for future employment needs.

### **Brexit**

- 2.18. In addition to an acceleration in e-commerce activity, the demand for logistics space has also been driven partly by Brexit, which has resulted in increased needs in the food, 3PL, pharmaceutical and healthcare sectors – all of which require additional capacity for storage and distribution of inventory. Brexit has also driven demand from new employers. European distributors and retailers, who pre-Brexit serviced the UK market from the continent, are now actively seeking warehouse premises to create a UK hub. Weerts recent acquisition of 800,000 sq ft in a single building in Bury St. Edmunds is one of the first examples of this transition.
- 2.19. As the UK adjusts to life outside the EU, and the fragility of international supply chains has been revealed, there has been notable growth in demand from manufacturers: a direct response to the re-shoring of activity and a move from ‘just-in-time’ to ‘just-in-case’ inventory management.
- 2.20. The unprecedented disruption in global supply chains in 2020 / 2021 has led retailers and manufacturers to seek to increase inventory levels close to their customer base. A recent survey found that 41% of occupiers expected to take more warehouse space over the next two years, partly as a result of Brexit and other supply chain disruption<sup>10</sup>. These changes have resulted in a significant increase in demand for warehouse space in key locations. As such, 2020 and the start of 2021 saw the highest levels of transactions for warehousing space on record<sup>11</sup> and we are seeing record take-up rates and record low national vacancy rates, with the average void rate being -2 months in 2021<sup>12</sup>.
- 2.21. In addition to the quantum, the type of warehousing unit sought is also changing. The trend now is largely towards bigger warehousing units, with a 242% rise in demand for units over 1m sqft<sup>13</sup> since 2015. Indeed 40% of the total 640million sqft of logistics space requirements logged between January 2020 and October 2021 was for units of over 500,000 sqft<sup>14</sup>. Furthermore, of the space transacted in the first half of 2021, 43% was build-to-suit, 34% was speculatively developed space, and 23% was second hand, which demonstrates a preference towards newly developed, higher quality space<sup>15</sup>.
- 2.22. Given the rise in demand and high level of take-up in the sector over recent years, market agents predict that by combining the current level of supply and using the three-year rolling average take-up of 40.4 million sqft, there is just 9 months’ worth of supply left within the whole of the UK.

7 <https://www.greaterbirminghamchambers.com/latest-news/news/2021/1/11/asos-to-build-90m-centre-in-lichfield/>

8 <https://www.theguardian.com/society/2020/oct/19/gordon-brown-calls-for-100-a-week-wage-subsidy-to-help-hire-under-25s>

9 Various see: Wingates, Bolton (APP/N4205/V/20/3253244), Junction 25, Bolton (APP/V4250/V/20/3253242) & Parkside, Newton Le Willows (APP/V4250/V/20/3253242)

10 2020 Logistics Census Results: The Sector’s Highest Ever Recorded Take-Up. Tritax Symmetry (December 2020) <https://tritaxsymmetry.com/wp-content/uploads/2020/12/Property-Week-Logistics-Census-Results-2020-04-Dec-20.pdf>

11 Spotlight: Big Shed Briefing. Savills (July 2021)

12 Savills Logistics Market Overview (November 2021)

13 The size and make-up of the UK warehousing sector – 2021. Savills (June 2021)

<https://pdf.euro.savills.co.uk/commercial---other/uk-warehousing-sector---2021.pdf>

14 Savills Logistics Market Overview (November 2021)

15 Spotlight: Big Shed Briefing. Savills (July 2021)

### Emerging Growth Sectors

- 2.23. E-commerce is not the only reason demand for large, well-located space has grown so significantly. Many manufacturers and production businesses rely on 3PLs to deliver goods to business customers or supply component parts to themselves. The growth of 3PLs is therefore as much a function of how businesses produce goods as it is how they distribute them. In addition to being a significant economic contributor in its own right, the logistics industry must be recognised for its value as an enabler, facilitator and catalyst of growth.
- 2.24. Demand for large logistics space has also been driven by new activities and sectors that have emerged in recent years and look set to become major new components of the economy in the future. In many cases these emerging sectors are competing with logistics uses for the same employment land without being factored into employment land calculations – adding to the supply side issues.

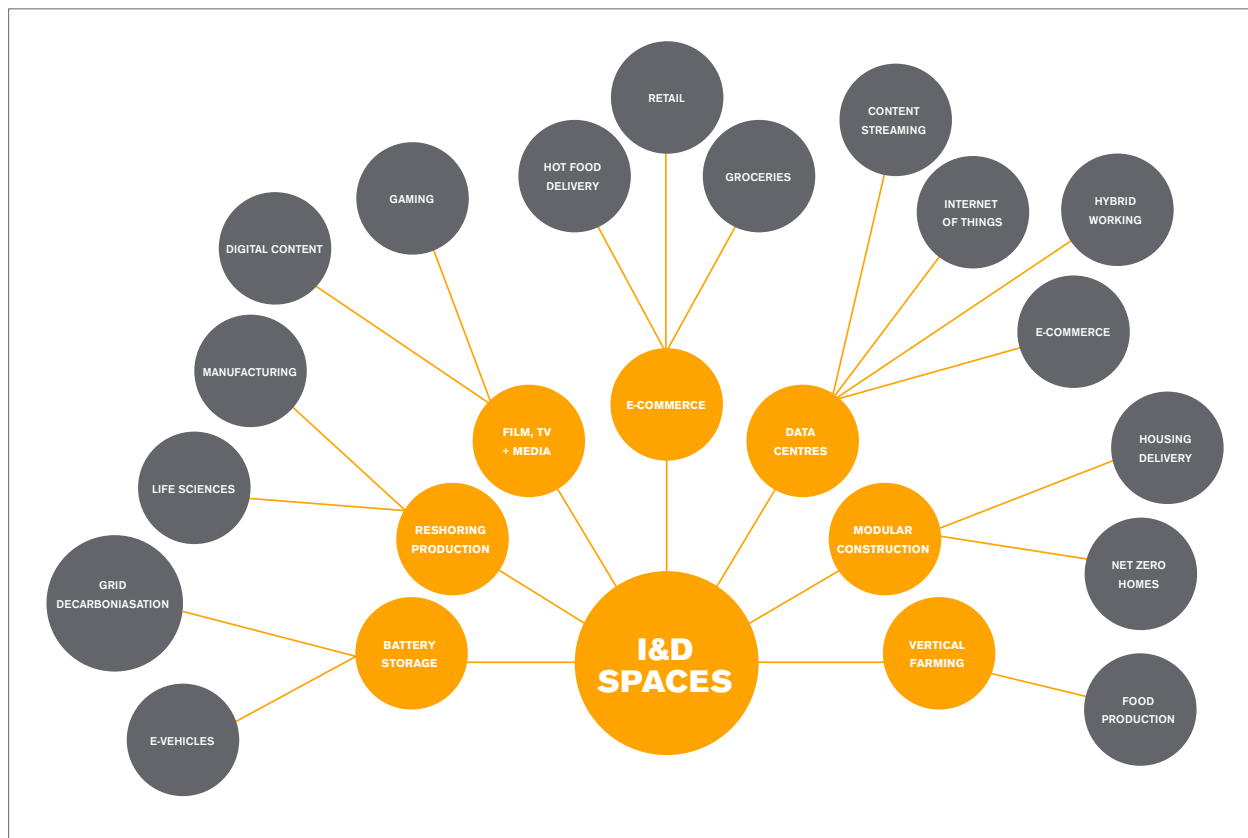


Figure 2.3 Demand for Logistics and Distribution Space and Wider Links to Economy

### Changing Operational and Locational Requirements

- 2.25. Consumer behaviours and the desire for faster, more convenient freight has resulted in shifting distribution patterns with repercussions which must be taken into account in the plan-making process. The increase in ecommerce activity, combined with the continuous growth in the number of companies offering next day, same day and on demand deliveries, has meant that the shape and operation of the freight system requires more regional and local storage space to meet customer demands. As the operational approaches within the sector change to respond to consumer/business needs there has been a shift in both the range of spaces needed and the locations within which this space is provided. Ultimately this is directly driven by the need to provide reliable and efficient deliveries to both businesses and direct consumers.

- 2.26. Growing consumer demand and a focus on shorter delivery timeframes has meant that e-commerce is reshaping the traditional distribution network within the UK. The established system was relatively simple: goods entered the supply chain (either from a port or UK factory) via a national distribution centre, which then passed goods to a regional centre, and then, from there, goods went to the end user. However, the growth in e-commerce and the arrival of next (or even same) day delivery has meant this is no longer a viable model – particularly when coupled with more defined delivery windows. Today, a more complex system is evolving. This includes a wider range of facilities that allow product ranges to be held for short periods of time much closer to the end user. The last mile of the freight system is the least efficient leg of the journey and optimising end point deliveries from warehouses significantly lowers overall costs and environmental impacts. Locating warehouses in optimal proximity to delivery destinations has the effect of reducing wasted mileage and overall travel patterns, and provides an opportunity to embed sustainability principles at the outset.
- 2.27. This is creating demand for new types of space that can help create an efficient ‘network’ of distribution points and which can align more closely to urban areas. It is also changing location preferences, with occupiers seeking locations that address a wider range of factors than just the cost of the space. Inevitably this means more land is needed in a much wider range of places.
- 2.28. As the sector becomes more reliant on automation and the roll-out of Electric Vehicles becomes more widespread the demand for energy will increase significantly. Whilst onsite generation through solar and other technology may help manage demand it is likely that grid capacity will become an increasingly important factor in location decisions. Already the datacentre market has experienced a price premium for locations with good grid connections and latent supply capacity. It is expected that the logistics sector will follow suit. Demand is only going to strengthen in locations that can meet these business needs and sufficient employment land must be provided to facilitate economic growth. Britishvolt is a live example of this dynamic – locating in Blyth principally to benefit from strong grid connections.
- 2.29. Alongside the land supply issues, greater coordination is needed to ensure that investment in wider infrastructure (including skills) to ensure businesses can invest and grow in the locality. Given the scale of investment being made in the logistics sector in particular, new developments offer an opportunity to unlock the delivery of this critical infrastructure, which, in turn, can support a much wider range of activities in a location.
- 2.30. The operation of this new distribution network has different locational requirements, which is driving land and floorspace demand in different parts of the country than has traditionally been the focus. Although the ‘Golden Triangle’ remains the focus for large-scale National Distribution Centres, demand outpaces supply and new markets are appearing in the ‘next nearest’ (secondary) locations, particularly given the impact of land prices and labour shortages.
- 2.31. A range of new industrial sub-markets have emerged or smaller markets have grown as a result of these needs. However, what is clear is that while demand is somewhat footloose, this is only within certain limits. The ultimate constraint on how far businesses can be from their ‘ideal’ location is the ability to service the intended market. Moving too far from it breaks down the efficiency of the distribution network and means delivery times and windows cannot be met. There are no set parameters for the scale of area within which a business can locate to service a particular market. The determinants of this location flexibility are focused on a number of considerations, including:
- Operator specific models;
  - Density/scale of population;
  - Scale/nature of business base;
  - Highway access and congestion;
  - Accessibility to RDC/NDC; and
  - Planned growth and development (i.e. a growing market).
- 2.32. There have also been fundamental shifts in the operational needs and priorities of logistics businesses in the sector arising from technological advances and the need to take steps to respond to the climate emergency.

- 2.33. Much has been made of the fast-paced adoption of new technology in the logistics sector and its impact on efficiency of deliveries management. However, what is less well understood is the changes it enables within the operational estates they occupy. As a response to increases in the volume and speed at which goods are processed, logistics operators have focused on occupying more floorspace more efficiently. This is enabled by new technology applications, such as automation, which allows goods to be stored vertically on taller racks. The introduction of automated vertical storage systems such as vertical lift modules have enabled businesses to create a saving of up to 85% on floorspace required to store goods.
- 2.34. Ultimately this has meant that many operators now place more importance on building volume than building footprint. Consequently, buildings are getting larger to cope with demand volatility. Operators are increasingly attracted to warehouses that are of a sufficient height to allow for internal stacking and installation of automated machinery. A warehouse that offers scope for expansion and contraction will be best placed to meet market requirements.
- 2.35. This ability to use the floorplate of a building more efficiently is driving a new generation of building typologies that accommodate more activity and output within the same built footprint. This new building typology has allowed major retailers with a significant e-commerce presence such as Ocado, Amazon and Tesco to make much more productive use of sites they occupy by utilising vertical space. In effect this creates a much more efficient use of land. This creates demand for new buildings as many older employment units cannot accommodate modern operational needs due to low eaves heights and clearance.
- 2.36. Increasingly, businesses are also more conscious of their environmental impact and actively seeking premises that allow them to improve the sustainability of their operations. The demand for more efficient space is creating additional pressure for development within the industrial and distribution sector. Over the past 5 years there has been a steady upward trend in the delivery of stock that secures higher environmental performance, with 2021 expected to set a new record for the number of properties built that reach the highest energy performance standards (Figure 2.4). Both developers and occupiers are directly addressing the issue and seeking to integrate new forms of heating and power generation - from solar to heat recovery - in order to improve performance.

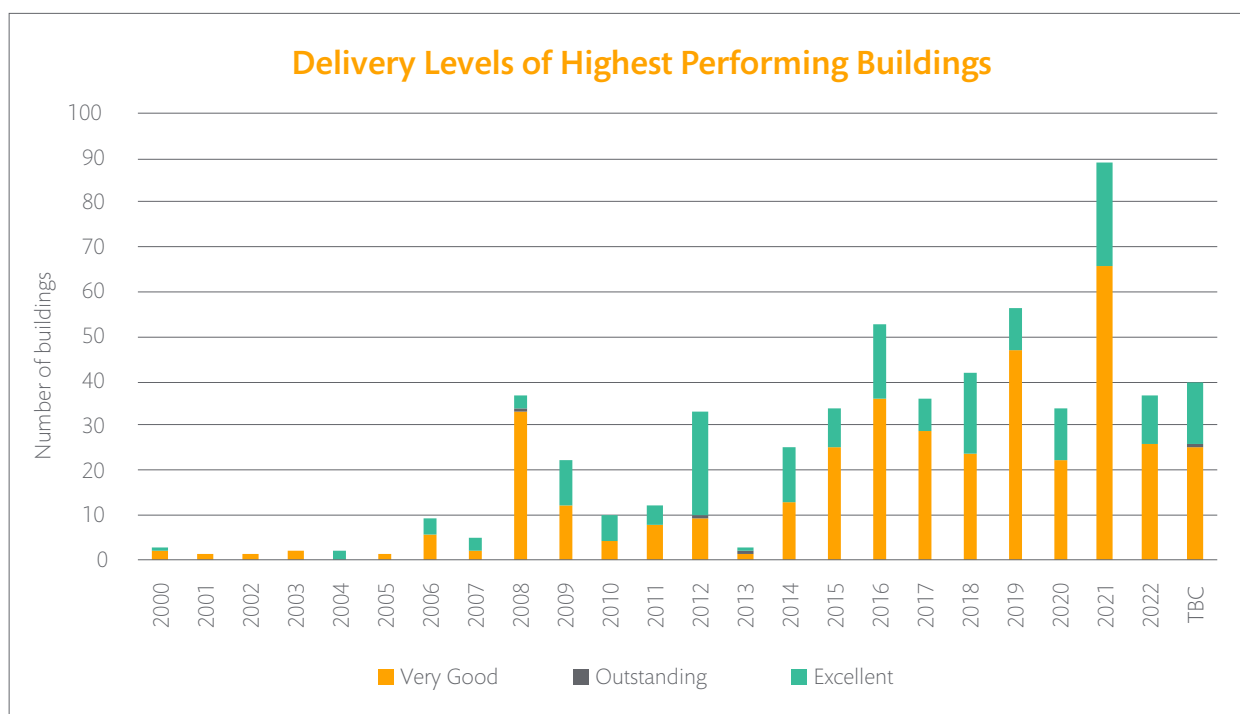


Figure 2.4 Delivery Levels of Highest Performing Buildings



- 2.37. Ultimately businesses are beginning to make decisions based on these factors, with some major occupiers now actively relocating from poor performing stock into new, more efficient premises. This dynamic creates a new layer of demand for replacement stock in addition to space needs generated by new demand.
- 2.38. In summary, as the country recovers from the COVID-19 pandemic, both the pre-existing trends and the amplification provided by the lockdown periods suggest that the industrial and logistics sector will continue to perform strongly. It is anticipated that there will be significant growth in research and development and advanced manufacturing sectors reflecting the key objectives in the Government's 'Building Back Better' plan for growth and their commitment to significantly increasing investment in the innovation sector. It is important to acknowledge that growth within these sectors will have a ripple effect, which will generate increased demand for logistics space to distribute goods or components to business customers.
- 2.39. Therefore, in line with national planning guidance, and the strategies to build back better from COVID-19, it is increasingly important that spatial planning at a regional and local level takes into account both the changing requirements of logistics developers and occupiers in terms of the type, size, quality and location of facilities needed to meet growing demand.

### Regional Context

- 2.40. In this sub-section we consider the importance of the site's location within economic growth corridors (including the Oxford-Cambridge Arc and the UK Innovation Corridor) as well as the regional market context for large-scale regional logistics/distributions operations.

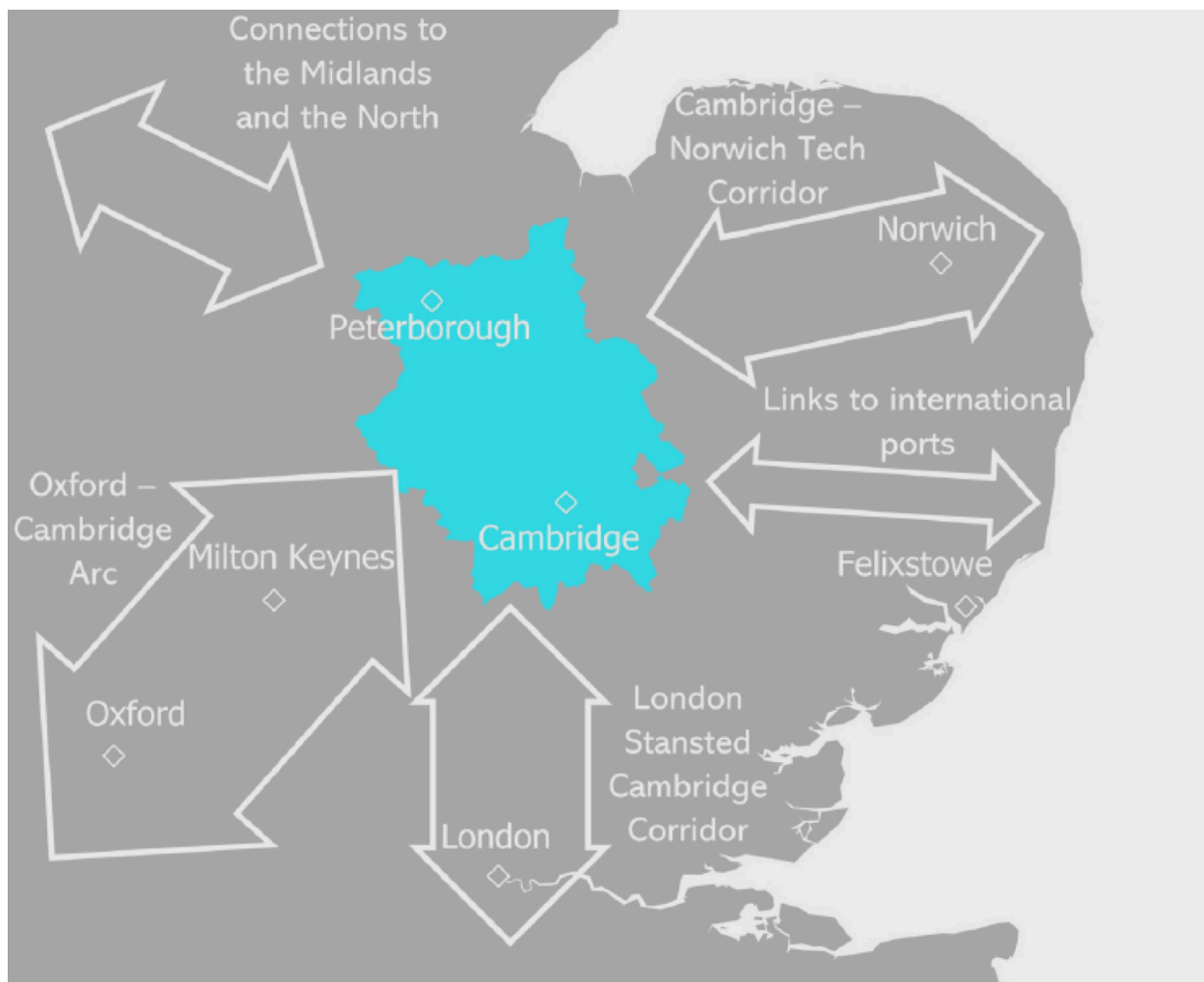
#### The Oxford-Cambridge Arc

- 2.41. The Oxford-Cambridge Arc ('the Arc') is being promoted as the World's Premier Growth Corridor as well as an exemplar of sustainability. The approach for the Arc is to be bold, visionary, pro-development and action-orientated.
- 2.42. The National Infrastructure Committee ('NIC')s 'Partnering for Prosperity' Report (2017) sets out the overriding vision for the Arc and, in terms of employment growth, states:

**"the area could support around 335,000 new jobs to 2050, increasing economic output by around £85bn per annum (2011 prices). However, by meeting future needs and removing the constraints to growth arising from the area's housing shortage, the area could sustain a transformational level of growth, supporting around 1.1m new jobs and increasing economic output by £163bn per annum".**

(Our emphasis)

- 2.43. The Cambridgeshire and Peterborough Local Industrial Strategy was published in 2019 and sets out how the area will take full advantage of its global assets and maximise the economic opportunities of the Oxford-Cambridge Arc. It identifies logistics as one of the five key sectors supporting the Cambridgeshire and Peterborough economy. It recognises that the connectedness of the region to the UK transport network plays a significant role in the UK logistics sector and recommends that suitable sites should be allocated which have good motorway connections and access to a local labour supply to support growth (Figure 2.5).



**Figure 2.5. Extract from Cambridgeshire and Peterborough Local Industrial Strategy**

- 2.44. The ambition for the Oxford-Cambridge Arc is well documented and is focused on unlocking investment, driving economic growth and promoting world class research, innovation and technology assets, as set out in the Oxford-Cambridge Arc Economic Prospectus (2020).
- 2.45. In 2021, the MHCLG set out plans to prepare a Spatial Framework for the Arc to cover the five counties of Oxfordshire, Northamptonshire, Buckinghamshire, Bedfordshire and Cambridgeshire. As set out in the 'Planning for Sustainable Growth in the Oxford-Cambridge Arc' (2021) the new Framework will plan for growth in the Arc area, setting policies on the economy, the environment, transport, infrastructure and housing. The intention is that the Framework will have the status of national planning and transport policy.
- 2.46. The 'Creating a Vision for the Oxford-Cambridge Arc' document was published for public consultation in July 2021. This is the first stage in preparing the Spatial Framework for the Arc and seeks to obtain views to help create the vision and guide the future of growth of the area to 2050. This consultation process closed on 12th October 2021 and two further rounds of consultation are planned in Spring and Autumn 2022, with publication and implementation of the Spatial Framework targeted for 2023.
- 2.47. At present, the overall growth agenda for the Arc does not appear to have permeated down to local authority level. As a result, the emerging economic needs evidence supporting the First Proposals consultation (including the Jobs Topic Paper published September 2021), fails to recognise the scale of ambition for economic growth within the Arc. By not considering the national growth ambitions for the Arc, the emerging Local Plan fails to positively plan for the level of growth required. A more coordinated and collaborative approach to the Arc's development would aid economic growth and allow the Arc to reach the upper end of its long-term aspirations.

### UK Innovation Corridor

- 2.48. The UK Innovation Corridor (UKIC) stretches from north and east London through Hertfordshire and Essex to Cambridge and Peterborough. It is the UK's leading sci-tech region, driving investment and growth in life sciences, ICT, digital and media, agri-tech and advanced manufacturing. It is home to over 2.1 million jobs and accounts for over one-tenth of the UK's total economic output.
- 2.49. UKIC is a non-statutory partnership of local authorities, businesses, colleges, universities, and Local Enterprise Partnerships seeking to harness the regions collective strengths as a globally renowned and competitive corridor for biomedical sciences, advanced technology, and business innovation.
- 2.50. In 2019 the UKIC published their Local Industrial Strategy Growth Directive which confirms that continued growth in the UKIC will be constrained by the supply of skills, the availability and quality of new housing, the availability of employment land and premises, and digital connectivity. It highlights the need to provide employment locations and premises for more workspace and premises for multiple employment uses and industry needs across the UKIC to support growth.
- 2.51. The UKIC also recognises the importance of encouraging and facilitating clustering within economic geographies to drive and maximise growth and innovation in research, manufacturing and supply chain capabilities, highlighting this in their representations to the BEIS Select Committee inquiry into options available to the Government to secure economic recovery from the impact of COVID.
- 2.52. Therefore, at the regional level there is ambitious plans for significant economic growth and development across the Oxford-Cambridge Arc and UK Innovation Corridor, including in the research and innovation, logistics and advanced manufacturing sectors to meet these goals. This will need to be taken into consideration as part of future planning for the region alongside the particularly strong market demand for logistics space, the lack of existing supply that is suitable to cater for occupier's requirements and limited development opportunities in the pipeline as described further below.

### Local Context

- 2.53. The previous analysis of national and regional economic trends and drivers highlights the increasing strength and presence of the logistics sector within the UK economy, driven both by increased consumer demand for home deliveries and also changes to economic activity that has seen more demand for stock to be held in the UK. Furthermore, competition for land and floorspace for such activity has increased as new sectors and activities have developed in the UK and now are seeking the same type of space and location.
- 2.54. Taken together this has resulted in a significant change in both the scale and location of need for additional industrial space across the country. As set out above, this new demand is leading to property requirements and need in all parts of the country as activities seek to locate either close to consumers or the businesses that they service.
- 2.55. These more recent shifts in the economy place a new emphasis on ensuring there is a strong and forward looking understanding of the sector in the plan-making process and that a reliance on past trends, as the core indicator to determine future need, is likely to lead to an under-provision of land for such uses.
- 2.56. The current "First Proposals" draft of the Local Plan policies are supported by Employment Land evidence prepared in 2020 by GL Hearn with SQW Ltd and Cambridge Econometrics and supported by Icen Projects Ltd and Justin Gardner Consulting. To understand whether the First Proposals adequately provide for growth in the logistics sector we start by considering how it assesses future need.

### **Greater Cambridge Employment Land and Economic Development Evidence Study (2020)**

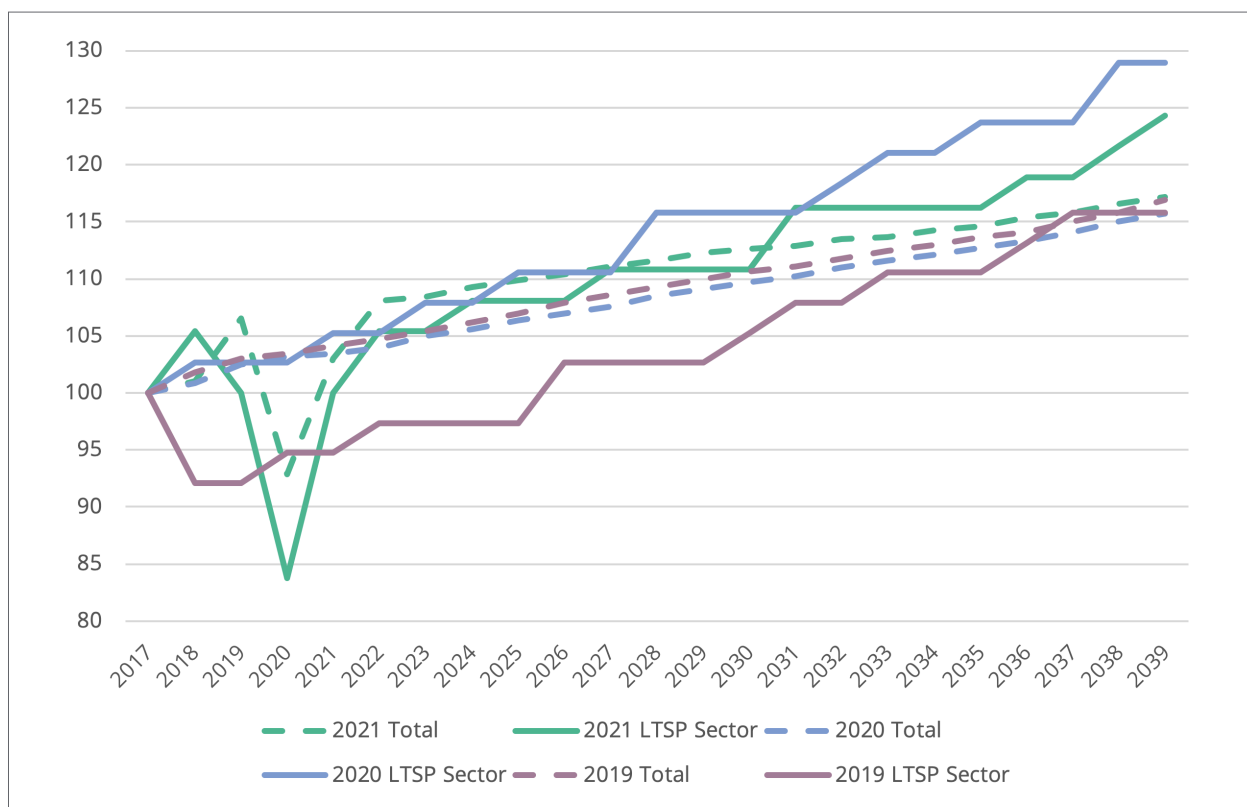
- 2.57. The Greater Cambridge Employment Land and Economic Development Evidence Study (“The Study”) follows a standard format and approach to the preparation of employment land evidence base, building up an understanding of the area’s market and economy from a range of desktop sources, using these to inform and test future growth scenarios and recommend the most appropriate strategy for the Local Plan to take.
- 2.58. The introduction to The Study notes that, whilst published in 2020, the data collection and analysis was ‘largely produced’ in ‘Autumn/Winter 2019’ prior to the start of the COVID-19 pandemic. Furthermore, the report itself recognises that further updates ‘may be’ required when the medium-term implications are clearer in relation to employment and economic development in the Greater Cambridge area. This is a critical consideration for the Local Plan process as the economy has changed markedly since the Study was prepared – one implication of this is considered later in these representations.
- 2.59. Paragraph 31 (Reference ID: 2a-031-20190722) of the Planning Practice Guidance (PPG) recognises the important role that logistics plays in a functioning economy. Furthermore, it also recognises that logistics has distinct locational requirements that need to be considered in the formulation of planning policies informed by a number of factors, as set out at paragraph 2.7 above.
- 2.60. Whilst Paragraph 6.37 of The Study acknowledges there have been changes in the logistics sector, it does not explore these in any detail or present any analysis on how this may impact the Greater Cambridge economy in the future. This is a critical over-sight, which limits the validity and robustness of the evidence base, even at the time of its preparation, when changes in the sector are well-established and driving demand to new locations and at a larger scale than before.
- 2.61. Over the past 5 years the UK economy has experienced significant changes, with the COVID-19 pandemic accelerating trends and bringing the critical role of the logistics sector into sharp focus. Even before the pandemic, wider changes to consumer and business behaviour were already underway and influencing demand for property across the UK. A combination of changing consumer demand and the emergence of new sectors provide new economic drivers for the demand for large logistics spaces in well-connected locations.
- 2.62. The shift to online shopping has led to significant expansion of activity and therefore increase property requirements as set out in paragraph 2.12 above. . Growth in online sales is expected to continue as explained in paragraph 2.9 above.
- 2.63. The Study fails to identify any of these strategic trends in terms of the scale of demand, or consider the role the whole Greater Cambridge area would play in the market. At Paragraph 2.105, the Study simply states that “Although the logistics market is much stronger in places such as Peterborough, there is still a market for “last mile” logistics companies in South Cambridgeshire.” Whilst it is not disputed that traditionally the Peterborough area has been a stronger market, the limitation of the Cambridge market to ‘last mile’ (which itself is not clearly defined) is not clearly evidenced or established. This may have been a historic trend, but changes in the market if properly understood, would challenge this assertion.
- 2.64. Overall, the Study uses this early observation to shape the remainder of the report and how B8 uses are considered. There is no evidence of detailed engagement and input from those involved in the market to ‘look ahead’ to understand how future demand compares to the past, nor how changes to space requirements would change the scale and nature of requirements of even existing businesses. Ultimately, if the Study were to have undertaken this engagement and analysis it would have identified a wider range of requirements and demand than currently captured. We present a snapshot of this later in the representations.

- 2.65. The Study's approach to calculating future demand focuses on past growth and historic growth – repeating the issues already highlighted above in relation to how the Study considers the sector and its future needs/opportunities. The study states that two key steps were taken to developing the employment forecasts. Those being:
- *“Considering estimates of historic data: different sources have differing views on the aggregate and sector performance of the South Cambridgeshire and Cambridge City economies over different periods. Given the importance of understanding historic change in forecasting future performance, the first step was to establish a preferred dataset to work from.*
  - *Testing a range of modelling approaches: initial modelling work was developed using the East of England Forecasting Model and using data provided by the Centre for Business Research at Cambridge University. Further work was then developed using long term historic data. Appendix A sets out the approaches considered and provides the technical workings in relation to the preferred methodology.”*
- 2.66. Using this methodology and relying upon historic data does not take into account the full market demand and the drivers in the UK economy – limiting it to the constrained position that the preceding analysis establishes. Furthermore, as has been highlighted in previous sections of these representations, the sector has changed so significantly that any ‘past trends’ will not reflect the sector today or what it will be in the future. This issue is exacerbated in Greater Cambridge where land supply for the sector has traditionally been constrained by policies that limited the scale of development – meaning past take-up can in no way capture the true nature of demand.
- 2.67. As noted in the study itself, the forecasts were all prepared pre-COVID and therefore whilst the econometric modelling may capture some of the broader sector trends (although how this is done is not clear) they would certainly not reflect the significant changes that the pandemic has had on B8 uses in particular. This is not a criticism of the Study per se (the authors themselves highlight the issue) but does need to be borne in mind when translating the recommendations into policy – with a need to ensure that policy is based on the most up to date understanding of the market.
- 2.68. Overall, whilst in the main the Study does provide a robust basis for policy development across much of the economy, it does not meet the PPG requirements in relation to the consideration of logistics and the role it plays in the economy. In simple terms, it fails to analyse the nature of the sector in a way that clearly unpacks the implications of the changes to the sector on the local economy and therefore land requirements. The key weakness is a reliance on desktop data sources that only present historic market data, rather than more in-depth engagement with actors in the sector to understand what is needed for the future and how this differs from the past.
- 2.69. Critically, from a policy perspective, there also needs to be an updated understanding of how the sector (and subsequent land needs) has changed since the publication of the Study largely (but not solely) as a result of the COVID-19 pandemic and, therefore, it does not provide an up-to-date evidence base for future B8 provision within South Cambridgeshire. Any policy that doesn't take this into account will fundamentally mis-represent the needs of the sector going forward and fail to plan positively for these key activities.

### **The Impact of the Pandemic on Future Needs**

- 2.70. As noted, the employment land needs are based on forecasts prepared during 2019 (the specific dates are not clear) and therefore would not fully reflect the impacts on the logistics sector that have occurred throughout 2020 and 2021 as a result of the pandemic.
- 2.71. This has significant implications for understanding the land and floorspace requirements of the sector and, if not fully understood, would lead to an undersupply of land over the plan period. In this section we use a series of consistent forecasts to highlight the potential impact of using out of date projections as the basis for future land needs. The intention is not to provide an ‘alternative’ forecast, or suggest a precise level of land allocation, more highlight how significantly the needs of the sector are changing within econometric modelling.

- 2.72. The forecast used was prepared by Experian as part of their Local Market Forecast series, which provides a range of employment, GVA, population and other projections at the local authority level. It is not directly comparable to the EEFM used as the base for the employment land study, but has the advantage of being updated every quarter so changes can be more easily tracked over time. The EEFM is updated much less frequently and there is no contemporary data to allow such a comparison. Experian can also not be directly compared to the adapted model used in the Study, prepared by Cambridge Econometrics.
- 2.73. To provide the comparison, we have used three different forecasts from Experian covering time periods that reflect the preparation of the employment land study and then the position at the time of preparing this submission. This means forecasts are from March 2019, March 2020 and September 2021.
- 2.74. Given the nature of the Experian model all data is reviewed at every issue, therefore even historic data is subject to minor adjustments in line with input data changes – for example historic employment levels are adjusted to reflect retrospective changes to BRES data by the ONS which are made periodically. Therefore to allow comparability we have set a common base position (100 in 2017) and applied the annual growth rate from each forecast to it.
- 2.75. Experian provides a 20 year forecast, therefore for each year of publication the end date changes. To allow comparison, we have fixed the end year at 2039 and applied the forecast from 2017. The year 2017 was chosen to align with the last issue of the full EEFM.
- 2.76. Finally, for each forecast we considered two elements of the projection. First is the total employment growth forecast – to highlight how general economic prospects have changed over the period between forecasts. Second is the isolated projection for the “Land Transport Storage and Post (LTSP)” category within the Experian model, which provides the best proxy for the logistics sector in general. Whilst demand will arise for such space from other sectors, and indeed some employment will be in non-logistics space from the LTSP sector, on balance it provides a solid basis for comparison.



Source: Avison Young analysis of Experian, 2021

**Figure 2.6 - Comparison of Forecast Needs**

- 2.77. Starting with the total employment forecast, as shown, all three of the forecasts present relatively similar levels of overall growth between 2017 and 2039, with the 2019 and 2021 forecasts suggesting overall employment would grow by 17% compared to 16% in the 2020 forecast.
- 2.78. However, for the LTSP sector there is a much larger difference in the level of growth, with the latest (2021) forecast suggesting 24% growth, the 2020 forecast predicting 29% and the 2019 forecast only indicating 16% growth. This level of growth would mean an additional 600 FTE jobs in the 2019 forecast compared to 900 or 1,100 in the 2021 and 2020 forecasts. All are significantly higher than the 457 FTE jobs in the 'labour demand' scenario within the employment land study, and more in line with the 'labour supply' scenario, which is not carried forward as the basis for future need – suggesting there is an under-provision of land in the Local Plan.
- 2.79. What is also noticeable in these forecasts compared to those in the employment land study is there is a year-on-year positive growth trajectory in all of the forecasts, suggesting that across the whole plan period there will be need for additional space. The employment land study forecast doesn't reflect this, showing a modest need occurs in the short term and then decreases in each 5 year period thereafter. Again, if used for land allocation decisions, this would lead to a shortfall of land within Greater Cambridge.

### **Demand Beyond the Forecast**

- 2.80. Even having considered the most up to date forecasts available, there is still likely to be an under-provision of land in Greater Cambridge if market signals are not fully understood or taken into account. Despite their sophistication, no economic model can capture local market dynamics or take account of demand that exists but unable to manifest itself locally as a result of a lack of land supply as they all rely (to a greater or lesser degree) on an understanding of past trends and performance.
- 2.81. In a sector that is growing and changing so rapidly as a reaction to new consumer and business behaviour, which in turn change location and nature of space demand, there is no 'past performance' that would reflect future growth opportunities. To understand this in more detail and to ensure positive planning for such activity a much clearer understanding of market factors is needed.
- 2.82. Bidwells are the leading commercial agents in the Greater Cambridge market and as such, have unparalleled insight and information into demand locally both today and in the future. Critically, this includes occupier requirements that currently exist in the market but are unable to find a location, which would otherwise never feature in any centralised datasets.
- 2.83. At the headline level, Bidwells estimate that they have c.500,000sqm of existing requirements for industrial and distribution space in Greater Cambridge, with supply standing at below 20,000sqm – with proposed sites adding a further c.25,000sqm – suggesting a significant shortfall of space now and across the plan period.
- 2.84. This demand-supply imbalance is exacerbated when the focus is placed solely on the B8 sector, where Bidwells estimate live demand for over 200,000sqm of space but no "significant" sites available and only two plots in a 20 mile radius capable of accommodating 10,000sqm+ buildings – a core area of the market where demand is increasing significantly.
- 2.85. Bidwells highlight that this demand for larger units is not solely a function of new businesses seeking to locate into the area for the first time, but that a significant proportion of demand (over 100,000sqm) comes from businesses already in the area that are seeking to grow. A lack of sites suitable for them means that they are having to seek space outside of Greater Cambridge meaning that not only does the area risk not securing new employment opportunities but also risks losing those already in place.
- 2.86. The analysis by Bidwells shows that there are no existing properties in Greater Cambridge available for occupation for larger businesses, and no sites with sufficiently established planning status to be considered part of the available supply. Two sites (Coldhams Lane and Northstowe) have been identified as having potential for such space, but do not benefit from planning and, in the case of the former, is a redevelopment of an existing industrial site and therefore offers no uplift in capacity.
- 2.87. Overall, there are no sites currently identified for large-scale logistics activity within the draft Local Plan. This reflects the limited view the employment land study and, hence, draft Local Plan have taken in identifying and allocating sites.

- 2.88. A study for the Greater Cambridge Partnership by WSP (published in June 2021) sought to provide further evidence on the need for B8 premises across the area by engaging with the industry. It undertook a series of interviews within businesses and developers to “explore current availability and demand for B8 space in the Greater Cambridge area”. Six companies replied to the initial contact saying they had an outstanding requirement and all reported difficulty in finding suitable space. The responses were from a mix of developers, international logistics operators and more local businesses so provide a cross section of future occupier needs. They reported two key constraints: firstly a lack of opportunities for larger (10,000sqm+) premises and, secondly, affordability – with much of the latter issue considered to be a function of the lack of supply.
- 2.89. Critically, this market analysis also highlighted that the majority of demand was locally orientated, i.e. businesses wanted to be in Greater Cambridge in order to (principally) serve the local area – even the larger logistics operators had a focus on serving Cambridge as the key location driver- albeit accepting they could also service a wider area, as needed.
- 2.90. If the market signals identified by Bidwells and WSP analysis were taken into account, alongside the more up to date understanding of forecast employment growth and changes to the distribution sector, then the draft Local Plan would take a very different approach to land allocation to that set out within the First Proposals consultation document.
- 2.91. On this basis, draft Policy S/JH clearly underestimates and fails to meet the need for employment floorspace, particularly Class B8 logistics floorspace in Greater Cambridge. This does not reflect national planning policy guidance set out in Paragraph 83 of the NPPF that calls for planning policies to recognise and address the specific locational requirements of different sectors, including storage and distribution operations at a variety of scales and in suitably accessible locations.

### **Site and Land Competition**

- 2.92. It is clear that there is significant demand for space that isn't currently being addressed in the “First Proposals” draft Local Plan and there is a need for more land to be allocated to accommodate growth that the supporting evidence base fails to adequately allow for.
- 2.93. Critically, this land demand would be truly additional to existing land needs and, given the characteristics of the occupier, need would be in materially different locations. Therefore, it would not ‘crowd out’ or displace any demand for other employment land uses and would complement their delivery.
- 2.94. Primarily, this lack of competition comes from requiring very different attributes from a site. In Greater Cambridge there is a need to accommodate two principal streams of demand. The first would be provision of space to accommodate knowledge-intensive, innovation-style activity in the life science and digital industries (‘science parks’), the second would be modern, efficient industrial and warehousing based activity (‘industrial parks’) capable of accommodating larger (10,000sqm +) floorspace – each has a clear set of occupier requirements that inform location decisions.
- 2.95. From a science park perspective, the key considerations are:
- Access to a skilled workforce – the success of science/research parks is driven by access to talent and the ability for occupiers to attract people to work in them. Cambridge benefits from a pool of highly qualified people, who are often educated at the University. Talent is what attracts occupiers and, in order to attract talent, companies must provide attractive places to work.
  - Urban environments – linked to the attraction and retention of talent there has been a shift in the market away from out-of-town employment locations to a more accessible urban environment. These locations offer better opportunities for the transfer of tacit knowledge, through informal and often social interactions. Furthermore, cities and urban areas provide a range of leisure and cultural amenities that are required to attract and retain top talent.
  - Proximity to anchor institutions and R&D clusters – its important for science/research parks to be located close to organisations that are undertaking research and development. The Brickyard Farm site is located away from University of Cambridge colleges and campuses. Furthermore, the site is located some distance from the main hospitals which undertake research, which are located to the south and south east of the city.



- 2.96. From a distribution park perspective, the key considerations are:
- Proximity to the trunk road network – in order to achieve reliable journey times and improve the efficiency with which goods are transferred a location at, or close to, a major truck road junction is seen as critical to operators.
  - Accessibility to suppliers and customers – whilst being close isn't a prerequisite, the ability to be able to access both clients and suppliers easily is vital. As more demand is focussed on end user consumers, this is driving needs to be focussed closer to urban populations.
  - An available workforce – as with any sector the ability to fill jobs is critical. Within the sector this reflects a range of occupation types from entry level workers through to managerial and technical roles that require higher skill levels.
  - Security and operational hours – facilities operate 24/7 and often handle valuable items. As such, secure locations with the ability to operate without adversely impacting neighbouring uses is key. This requires sites that are buffered from residential uses, in particular.
- 2.97. The proposed site at Brickyard Farm clearly meets the locational requirements of the 'distribution park' typology – offering strong road connections to customers, direct access to the trunk road network, access to a skilled labour pool and separation from other existing or proposed neighbouring uses. On the other hand, the site, located 12km to the north west of the city, does not make it an attractive location for a 'science park'. Fundamentally, it is located too far away from R&D institutions that would be required to anchor such a park and make it a successful place. It also lacks many of the characteristics of urban areas that are attractive to top talent in a competitive market.
- 2.98. As such, there would be no risk that the site being allocated and developed as proposed would either displace other forms of demand or create competition for better located sites being promoted for 'science parks'. On this basis, there is no evidential basis for the proposed restriction on large-scale regional and national warehousing and distribution within the area in draft Policy J/NE. which is also contrary to economic trends, market demand, and national planning policy guidance.

#### Changes Requested:

- **The evidence base supporting the draft Local Plan is updated to reflect recent market and economic trends, particularly in terms of e-commerce and the impact this has had on demand for logistics floorspace.**
- **The scale of employment development envisaged within the evidence base and emerging Local Plan is significantly increased to align with economic trends and to take into account the wider ambitions for the region and the vision for the Oxford-Cambridge Arc.**
- **The Brickyard Farm site is allocated to assist in meeting the employment needs of Greater Cambridge.**
- **Ensuring policy sets the assessed land requirement as a minimum rather than a ceiling on employment-generating development in Greater Cambridge.**
- **The proposed Policy restriction on large scale regional and national warehousing and distribution within the area in draft Policy J/NE be removed to align with national planning policy guidance.**

# NEWLANDS DEVELOPMENTS

BRICKYARD FARM, BOXWORTH

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## CHAPTER 3

*BOXWORTH - A UNIQUE PROPOSITION*

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## 3.0 BOXWORTH - A UNIQUE PROPOSITION

### Locational Characteristics

- 3.1. Greater Cambridge occupies a nationally and internationally significant position at the heart of several economic corridors. Located at the eastern end of the Oxford–Cambridge Arc, and within the UK Innovation Corridor between London and Peterborough, it sits within an area with substantial ambitions for economic growth across a variety of sectors.
- 3.2. It is very well connected with good access to the strategic road network and a number of airports as well as being connected to key markets across the UK and abroad.
- 3.3. The site benefits from specific locational characteristics which make it a prime location for employment growth within Greater Cambridge and the wider region such that it can capitalise on economic investment and the strategic advantage of its location in the Arc.
- 3.4. Its locational characteristics also mean that it is well-placed to meet the needs of and provide a diverse range of employment for a growing population and provide essential logistics infrastructure that will underpin the expansion of a number of other key growth sectors which are reliant on these operations as part of their wider supply chains.
- 3.5. The site is located to the south of Junction 14 of the A14, approximately 12km equidistant to Cambridge to the southeast and Huntington to the northwest. It is also approximately 7 kilometres from Northstowe New Town which is currently under construction and accessed via the A14. It is, therefore, well located for access to large population centres in Cambridge, Huntingdon and a growing population of new residents in Northstowe.
- 3.6. Being located in close proximity to these population centres is a significant advantage of the Brickyard Farm site in providing an immediate supply of labour for new and expanding businesses. The scale of the Brickyard Farm site also offers scope to improve connections with these population centres through the provision of a new shuttle bus service between the site and Longstanton Park and Ride; travelling via the Northstowe development and access to e-bikes to boost accessibility for employees by bike.

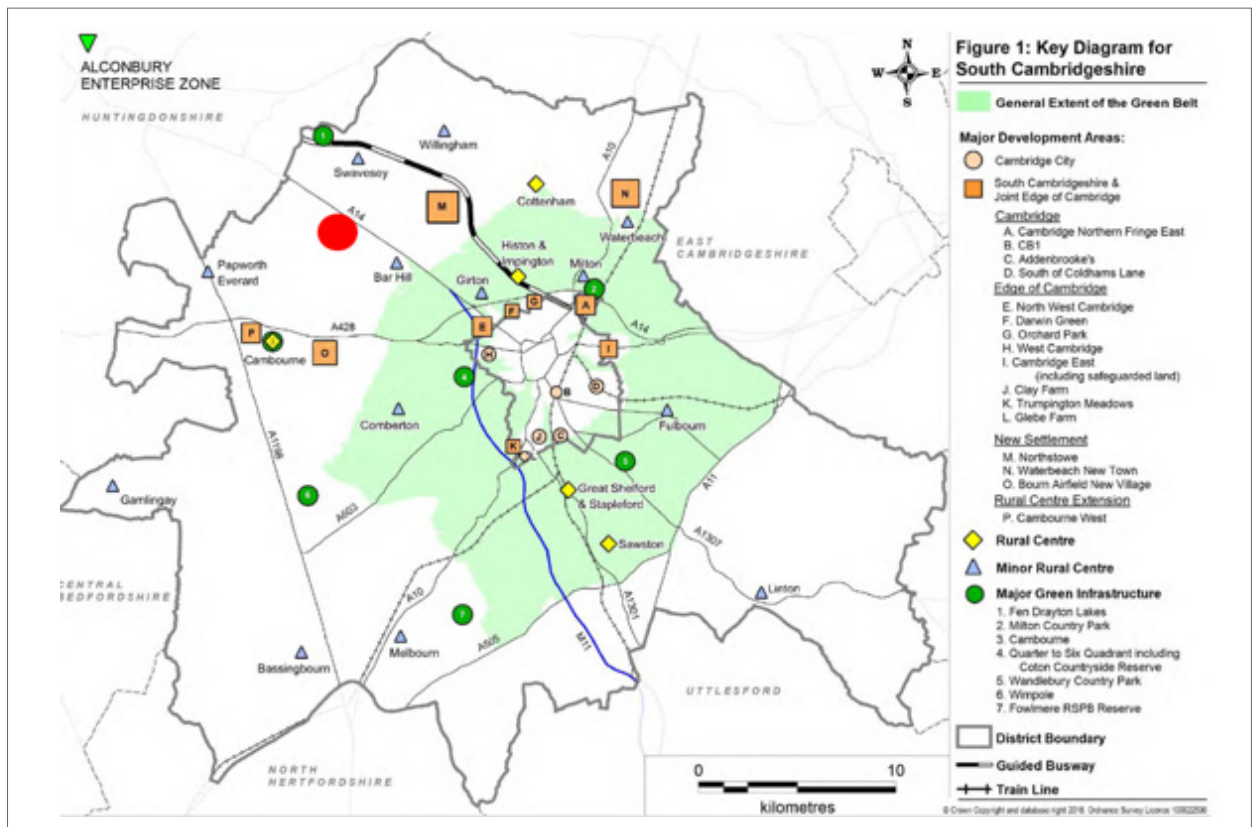


Figure 3.1: Key Diagram for South Cambridgeshire

- 3.7. The location of the Brickyard Farm site would also allow distribution premises to be located closer to end point customers, than under the Council's existing strategy, which would allow the first-mile to last-mile distances to be minimised with the potential to drive reductions in greenhouse gas emissions and vehicle movements on the strategic road network in Greater Cambridge.
- 3.8. The site is also located outside of the Green Belt so its development would result in no harm to the Green Belt and it should be preferred over the release of Green Belt sites. Its development would, therefore, reduce pressure on the release of other Green Belt land within Greater Cambridge to meet the needs identified in Section 2.
- 3.9. The A14 is a vital road transport corridor between the East Midlands and East Anglia, and is of local, regional, national and international significance. This stretch represents an important strategic link for freight transport between the A1 and the M11 motorway, and connects the ports in East Anglia with the Midlands and the rest of England. According to Highways England, the A14 carries around 85,000 vehicles per day; 26% of this is HGV traffic (against the national average of 10%). In May 2020 Highways England (now National Highways) completed a £1.5bn improvement scheme which upgraded 21 miles of the A14 and included a major new bypass to the south of Huntingdon to improve the efficient movement of people and freight to support local and regional growth. Indeed, the site's prime location for the provision of employment and logistics space to the north west of Cambridge on the A14 corridor is acknowledged in the Councils' own evidence<sup>16</sup> and its proposal to allocate the adjacent land to the east of Boxworth Road for such uses in its First Proposals Document.

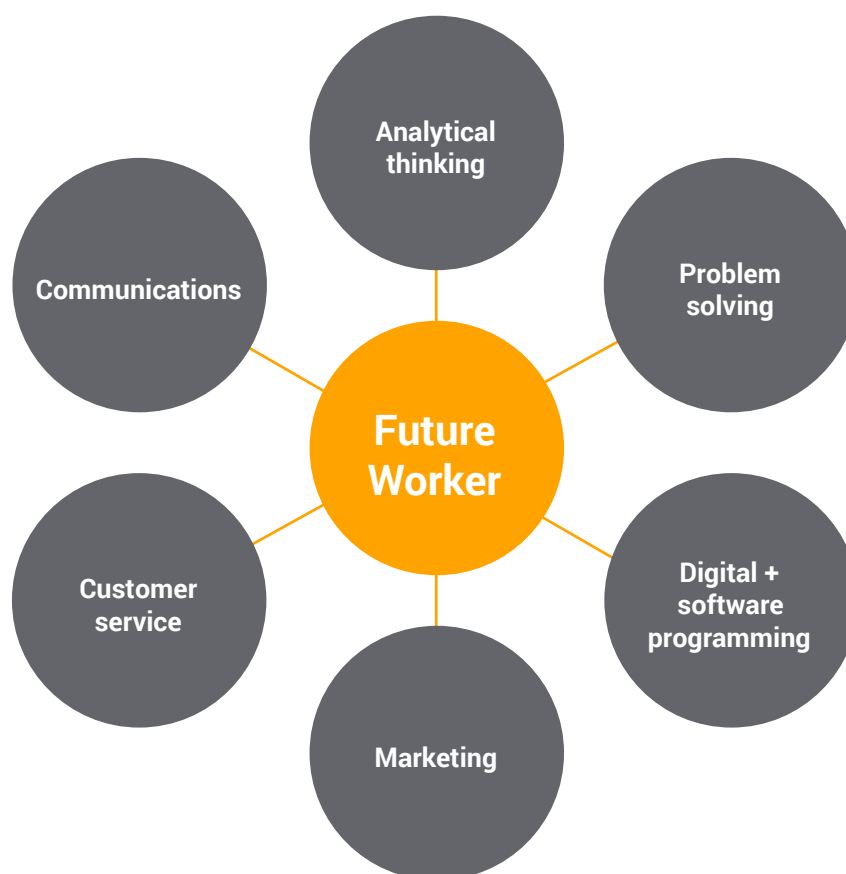
### Scale of Opportunity & Diversity of Employment

- 3.10. In addition to the locational characteristics of the site, it is of sufficient scale to attract major regional and national occupiers in a range of sectors, including those seeking to serve regional and national markets and seeking larger, high quality buildings which are increasingly required by occupiers, for which there is clearly demand for space in this area, as identified in the Councils' own evidence<sup>17</sup>.
- 3.11. The scale of the site is also important to its ability to provide space for a mix of sectors and employment uses that would deliver a diversity of quality employment.
- 3.12. Traditionally the industrial and distribution sector has been seen as a source of low-skilled, low-value employment which, whilst important, provides few progression opportunities for workers. However, in the logistics sector in particular, advances in operational approaches and the fast adoption of new technology has dramatically changed the career opportunities in the sector. This includes the shift towards automation and robotics within the logistics and industrial sector. There has also been a shift towards co-location of warehousing and office space, bringing sales, management and marketing roles to distribution parks.
- 3.13. A report by FTA Logistics shows that in 2019, c.15% of the total sector workforce was in high level occupations, with a further 43% in medium skilled roles (mainly drivers)<sup>18</sup>. The report also states that more than three-quarters (79%) of businesses expect to increase the number of higher-skilled roles over the coming years.
- 3.14. Research from within the sector suggests that career opportunities have broadened dramatically over the last decade. Whilst entry level jobs still exist, much of the previous functional activity has now been automated with a greater proportion of employment now focussed on ensuring complex picking and packing machines (for example) are maintained and operational as well as managing sophisticated logistics planning software. These require a high level of mechanical and electrical engineering, software, programming, logistics planning, finance and sales/marketing skills, providing both higher value jobs alongside more entry level positions and career progression opportunities.
- 3.15. The skills requirements of future workers in the sector will need to be much broader as the roles they undertake become more complex. Across the board, digital skills will be central to future employment. In many roles there is expected to also be a requirement for strong analytical and problem solving skills as distribution centres become more complex and logistics planning ever more sophisticated. This will also require strong communication skills to ensure good operational efficiency. Many roles will become more outward facing, particularly for delivery drivers. Customer service and marketing skills will therefore become more valuable over time – particularly as businesses seek to enhance the customer experience and replace what used to be an 'in store' experience.

16 Greater Cambridge Partnership - Understanding demand for B8 premises across Greater Cambridge - Industry Engagement (June 2021)

17 Greater Cambridge Partnership - Understanding demand for B8 premises across Greater Cambridge - Industry Engagement (June 2021)

18 FTA LOGISTICS Skills Report 2019



**Figure 3.2 Future Skills Requirements in the Logistics Sector**

- 3.16. The diversity of employment that the scheme would deliver in a variety of sectors, including logistics, research and development and light industry, would assist in diversifying the range and quality of occupations available within the local area.
- 3.17. This diversity of occupations would support the Councils in addressing the issues identified in the Cambridge Anti-Poverty Strategy 2020-2023, including issues associated with deprivation and the limited job opportunities available for those people on low incomes but looking to develop and move into higher paid occupations requiring intermediate levels of qualifications and skills due to the dominance of higher education, hi-tech and bio-tech sectors in Greater Cambridge.
- 3.18. In this respect, Newlands is committed to working with local partners, including the world-leading centres of learning in Greater Cambridge and the wider Arc, to ensure its developments are embedded in the communities they serve. It recognises the important role that logistics can play in securing a swift economic recovery and the need to provide support and upskilling for those entering the labour market, as well as those who have lost their jobs within the hardest hit sectors. To that end, Newlands is already engaging in initial discussions with education institutions and other organisations around how it can contribute towards a range of employment, skills and training measures during the construction and operational phases of development. This could include:
- Apprenticeships;
  - Work experience placements;
  - Site visits for educational purposes;
  - Student Presentations;
  - CV & Interview Preparation and Techniques;
  - Attendance at local jobs fairs.

- 3.19. The above will ensure local people, including hard-to-reach groups, are educated about, and have better access to, job opportunities arising from the new development. Newlands's approach aligns fully with emerging Policy WS/IO: Creating inclusive employment and business opportunities through new developments.

### Clustering

- 3.20. The site also provides an opportunity to extend the proposed allocation to the east and expand on existing development at Buckingham Business Park. This could provide enhanced opportunities for clustering and agglomeration economies which may support collaboration and associated efficiencies in supply chains.
- 3.21. The PPG recognises that clustering of certain industries including high tech, engineering, digital, creative and logistics activities, such as those proposed at Brickyard Farm, play an "important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate."
- 3.22. The National Infrastructure Commission<sup>19</sup> has also acknowledged that agglomerating related logistics uses in a location can, for example, minimise the distance that goods must be moved, maximising the efficiency of operations. It has also been suggested that clustering industrial and logistics can:

*"allow the exchange of knowledge, technology, and services; encourage innovation derived from the synergies among the cluster's occupiers; maintain and retain good conditions in the local infrastructure; provide access to the specialised workforce"*<sup>20</sup>.

### Sustainability and Renewable Energy

- 3.23. Newlands' partnership with Chelveston Renewable Energy, combined with the specific characteristics of the site, means that sustainability can be embedded into the heart of any scheme for the Brickyard Farm site whilst ensuring that development is sensitively designed and set within a Green Infrastructure network that allows it to effectively integrate with the surrounding landscape,
- 3.24. Newlands is working with Chelveston Renewable Energy to develop a comprehensive scheme for on-site renewable energy generation with the ambition of achieving a truly sustainable development that meets its own power requirements and provides opportunities for surplus green energy to be put back onto the National Grid. This is considered in further detail below and is a unique offering in Greater Cambridge that could be delivered by the Brickyard Farm site.

### Deliverability

- 3.25. Newlands Developments have considerable experience in identifying demand for employment industrial and logistics floorspace. They have an in-depth knowledge of the market ensuring they choose the right location and develop the type of floorspace and buildings which meet demand.
- 3.26. There is strong market demand for logistics, research and development and light industrial uses in this location and Newlands has a strong track record of delivery, including projects at:
- **Warth Park, Raunds** - situated on the A45 trunk road 4 miles south of junction 13 of the A14 and 10 miles east of Northampton. This mixed-use scheme includes c. 2.5 million sq ft of manufacturing, offices, distribution and retail. It also includes a country park with SUDs and substantial new tree planting.
  - **Peterborough Gateway** - next to Junction 17 of the A1(M) and is a 4.5 million sq. ft. industrial and logistics park. The scheme included highway improvements to the A1(M) junction. It is fully occupied with the last plot under construction.

19 Better Delivery: The Challenge for Freight (National Infrastructure Commission, April 2019)  
20 Warehousing and Logistics in Leicester and Leicestershire Managing growth and change (GL Hearn, April 2021)

- 3.27. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.
- 3.28. The HELAA provides an initial assessment of the potential sites in terms of their suitability, availability and achievability as key considerations in the assessment of deliverability within National Planning Practice Guidance.
- 3.29. Within Appendix 4 of the HELAA individual assessments of the sites are provided, including Brickyard Farm (Ref. 47353). The Councils' assessment of sites is based on a 'Red', 'Amber', 'Green' score against a number of criteria.
- 3.30. The Councils' assessment of the site can be summarised as follows:

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

- 3.31. As such, there is a clear acknowledgement by the LPA that the site is available and achievable for large-scale employment development.
- 3.32. These representations therefore seek to demonstrate that the site is also suitable for development and therefore should be allocated in the emerging Local Development Plan.

### Suitability

- 3.33. The NPPG sets out that a site or broad location can be considered suitable "if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated".
- 3.34. In order to demonstrate that site is suitable for large scale employment development, including storage and distribution, research and development and light industrial uses, and associated renewable energy park, the following sections consider the relevant technical matters to demonstrate that, when taking into account the technical work undertaken to date and the relevant mitigation, there are no constraints to development.
- 3.35. In respect of site 'suitability' it is noteworthy that the site performs equally with the proposed allocation to the south of A14 services (i.e. land to the east of the Brickyard Farm site) (Ref. OS250) against the majority of criteria considered in the HELAA except in relation to Landscape and Visual Impacts, Archaeology and Air Quality. The assessment and scoring of the site against these criteria is considered in further detail below.

## Landscape and Visual Impact

Landscape character

3.36. The relevant Landscape Character Type and Area for the site and the adjacent site which is included as a draft allocation (Land to the South of the A14 Services) is described in detail within the Greater Cambridge Landscape Character Assessment (Chris Blandford Associates, February 2021). Both are shown to be within the Wooded Claylands Landscape Character Type which has a landscape management objective of Conserve & Enhance.

3.37. It is described as:

**“rolling, elevated settled rural plateaux with shallow valleys which are characterised by low density villages and open views framed by areas of woodland.”**

3.38. The overall landscape condition is described as good with a strong character. The landscape character types are divided into geographical areas with similar characteristics. The Brickyard Farm Site is located within Local Character Area (LCA) 4a Croxden to Conington Wooded Claylands. This assessment includes the following description:

**“The villages tend to have well defined edges provided by mature trees, thick hedgerows, shelterbelts and woodland. Small fields and paddocks at village edges contribute to their landscape setting and provide a transition to the surrounding countryside. Views over undulating arable fields between settlements are long, framed by trees and look towards treed or wooded horizons. Vertical features interrupting the skyline include telegraph poles, pylons, lines of poplar trees, windmills at Bourn and Elsworth, and church steeples which are occasionally visible above the trees. The busy A1307, A14, A428 and A1198 roads are localised detractors from the rural tranquillity elsewhere within the LCA.”**

3.39. It is this vegetated context and wooded skylines that restrict the visibility of the Brickyard Farm Site.

3.40. The OS250 Site is shown to be within the adjoining LCA 4b Lolworth to Longstowe Wooded Claylands. This is described in the following way:

**“In general, villages tend to have an historic linear core and rural character with edges well defined by mature hedgerows, woodlands and clumps of trees providing visual enclosure. Enclosed small fields and paddocks often help the transition between village and farmland. Churches are landmarks within the landscape. Bar Hill is a densely populated planned village, atypical of the other villages, comprised of cul de sacs accessed from spine roads and surrounded by dense tree planting and hedgerows. Views from villages are generally long and framed by woodland or clumps of trees, across open fields towards wooded horizons. In the south of the LCA, the landform of the rising chalk escarpment provides localised visual enclosure. Occasional vertical features interrupting the skyline include telegraph poles, distant pylons and turbines which break the skyline.”**

3.41. Both LCAs share very similar landscape characteristics and features.



## Landscape Context

- 3.42. It is a 'big sky' landscape with potential for long-distance and panoramic views, although the nature of the landform also ensures that intervening built form and vegetation screen or filter these views. The local landscape context for both Sites incorporate intensive, open arable farmland, with wide and open ditches, or closely trimmed hedgerows, and intermittent woodland copse, and hedgerow trees which means it can feel sparsely vegetated.
- 3.43. At a Site level and within the immediate environs the existing baseline context includes the following landscape elements:
- Generally flat undulating landform with a locally significant ridgeline associated with the Jack o' Thumbs Grove to the south;
  - Arable farming with some sheep grazing;
  - Field size varies across the area with less field boundary vegetation and more ditches to the north of the A14;
  - Native mix field boundary hedgerows with scattered trees, and woodland copse, small woodland blocks and clumps of trees to the south of the A14;
  - Transport infrastructure including the A14 carriageway, lighting columns, fencing, new junction improvements and Cambridge Services and associated newly planted soft landscape mitigation such as hedge and woodland edge type planting;
  - Haulage vehicles and cars parked adjacent to the A14 within the Cambridge Services car parking area;
  - Buckingham Business Park which is comprised of offices and warehousing;
  - Wind turbines on higher land to the east;
  - Radio mast to the north;
  - Isolated villages and settlements usually clustered around a historic core with a Church with many examples of vernacular architecture; and
  - Farming infrastructure such as barns and silo.
- 3.44. In the Greater Cambridge HELAA (2021) Appendix 4: Proformas for all HELAA Sites (Part 4) the two Sites are described as follows:

Brickyard Farm Ref: 4753 (Pages 663-664): 4a Croxton to Conington Wooded Claylands

**"This is a very large and exposed site with minimal boundary treatment and is subsequently likely going to have an adverse impact on the rural landscape and NCA. Partial development is advisable in order to not detract from the existing village character of Boxworth. Appropriate screening along the northern boundary in particular from the new road and the A14 would be required. Rural facing boundaries in the south and west 663 Issue Assessment Comments would need to be established/strengthened to limit views of the development. The size of the site adversely impacts existing Landscape Character Area."**

Land South of the A14 Cambridge Services Ref: OS250 (Pages 675-676): 4b Lolworth to Longstowe Wooded Claylands

**"The Site is outside of the Development Framework boundary and therefore is within the countryside. Preservation of the rural countryside character is important and so boundary treatment will be increasingly important. Appropriate screening along part of the A14 is advised. Rural facing boundaries in the south and west are to be established/strengthened to limit views of the development. The Site is an appropriate location for non-residential development as it is adjacent to an existing commercial Site and benefits from a robust screen to the North"**

### **TG Analysis of Surrounding Landscape Context**

- 3.45. The landscape context exhibits urban influences including large-scale and vertical elements which are visual and landscape distractors, and the A14 carriageway, Buckingway Business Park and the new Cambridge Services and junction are visible in panoramic long-distance views. There has been extensive woodland and hedgerow planting in association with the junction and this will increasingly provide some screening and integrate both Sites into the surrounding landscape within the next 15 years. There are marginal differences between the two Sites in terms of landscape character and context.

### **Visual Context**

- 3.46. Visibility south of the A14 is relatively constrained by minor landform undulations and linear woodland belts, copses, and field boundary hedgerows. There are long-distance views from a limited number of locations to both Sites. Visibility from the north of the A14 which has views directed across the carriageway is more pronounced although again publicly accessible viewpoints are limited in number and usually filtered by built form, and road or garden boundary vegetation. The flat landform means that intervening built form and /or low-level vegetation effectively screen development.

### **Augmented Zone of Theoretical Visibility (ZTVs)**

- 3.47. A computer software generated 'Augmented Zone of Theoretical Visibility' (see Appendix 2) which includes vertical structures in excess of 3m height which have screening benefits to establish the potential visual envelope and is therefore more accurate has been created for both the Brickyard Farm Site and the OS250 Site adjoining the Boxworth Road south of the A14.
- 3.48. Augmented ZTVs are generated from a digital terrain model of the 5km radius study area (using OS Terrain 5 at 5m resolution) with a 3D model of the proposed development inserted at the expected height of the proposed development above existing ground levels. The height of the two proposed sites was set at 15m for the Brickyard site and 15m for the Land South of the A14 Cambridge Services.
- 3.49. These augmented ZTVs show the theoretical visibility of both of the individual Site's throughout the study area based on the average eye height of an adult (taken as 1.6m) and considers the screening effects of buildings and woodland in excess of 3m high (identified from OS Vector Map District Data). However, it does not account for lower hedgerows, individuals and groups of smaller trees and other scattered scrubby vegetation in the study area and the fact that features become recessive with distance. Also, the ZTV considers all potential visibility regardless of scale. Many of these views may be barely discernible or just glimpsed. Therefore, the actual visibility of the proposal is likely to be much less than indicated – especially when factoring in additional filtering effects of low maintained field boundary hedgerows.
- 3.50. The augmented ZTVs demonstrate visibility south of the A14 is generally filtered from Conington and Elsworth. The expected visual envelope for the two Sites shows potential visibility from Boxworth, Lolworth, Bar Hill and from Longstanton and Swavesey. There are differences in the extent of the theoretical visual envelopes, although on the ground this would be less discernible as features become recessive beyond 2km.
- 3.51. Effectively there is little difference between the visual envelope of the two Sites and how they would appear in views. The Brickyard Farm Site is larger but benefits from some screening from the minor ridgeline located immediately to the south while the potential inter-visibility with Lonstanton and Bar Hill, which has an elevated view, is potentially greater for OS250. If both Sites were developed the Brickyard Farm Site would be located behind and partially screened by the built form within the OS250 Site.

### **Landscape Strategy / Green Infrastructure**

- 3.52. Recommendations to integrate the Brickyard Farm Site proposals into the wider landscape and provide mitigation for landscape and visual effects include the following:
- extensive Green Infrastructure, including:
    - retention of existing hedgerow within the site and along key site boundaries, where possible;
    - new woodland, shrub and hedgerow planting within the site, along plot boundaries, and along site boundaries;
    - appropriate landscape buffers to nearby ancient woodland;
    - screening of the A14, including a landscaped earth bund; and
    - new green linkages through the site, broadly east-west, to filter views;
    - the creation of a network of SUDs;
    - additional biodiversity enhancements within the network of green infrastructure;
  - careful orientation of buildings to provide visual interest and allow some visual permeability while screening views to car parking areas;
  - selection of locally appropriate materials and a colour palette designed to assist structures being visually recessive, particularly in long-distance views;
  - careful consideration of building heights and earthworks strategy, with taller buildings located along the A14, behind a planted bund, and along Boxworth Road, with lower scale development in the south-west of the site; and
  - low-level renewable energy proposals located in more visually sensitive parts of the site; and
  - a glint and glare report will be prepared to demonstrate that impacts of solar array, as part of the renewable energy proposals, would be acceptable.

### **Landscape Summary & Conclusion**

- 3.53. The overall landscape and visual effects from the development of the Brickyard Farm Site is not assessed as notably different from that of the draft allocation Site located adjacent. Should the allocated Site OS250 proceed, the additional development within the Brickyard Site would also make little additional discernible change to the character of views, although there would be some minor cumulative effects. If the OS250 Site does not proceed to build out, the Brickyard Farm Site could be developed with similar landscape and visual effects.
- 3.54. The greater size of the Brickyard Site provides greater scope for visual mitigation and enhancement to landscape and views from the north of the A14 and from Boxworth and Bar Hill.
- 3.55. The two Sites share similar landscape characteristics and there is a minor difference in the extent of visual envelope for the Brickyard Site in comparison with the OS250 Site. The extent of the visual envelope does not mean that the level of perceived visibility or harm to the intrinsic landscape character is greater. The draft allocated Site OS250 is located closer to Lolworth village and the settlement Bar Hill, which would have a slightly elevated view of the proposed development from the PRoW and settlement edge. These views are less screened by landform or intervening vegetation than views to the Brickyard Farm Site.
- 3.56. Only partial built development is proposed for the Brickyard Farm Site with a quarter of the Site set aside for low level sustainable and renewable energy production through solar array and a large proportion of the land holding would be comprised of G I and SuDS proposals.

## Highways and access:

### Site Access

- 3.57. The site is located to the south of the A14 Junction 24 'Swavesey Interchange', from where access to Buckinway Business Park and the A14 Cambridge Services are gained. The A14 forms part of the Strategic Road Network (SRN), linking the M1/M6 Catthorpe Interchange in the west, to the port of Felixstowe in the east. The site is therefore excellently located for access to the SRN, as well as serving the surrounding towns.
- 3.58. The A14 Swavesey Interchange was upgraded as part of Highways England's A14 Cambridge to Huntingdon Improvement Scheme. It takes the form of a grade separated dumbbell roundabout arrangement, comprising the Swavesey North and South Roundabouts. Two further roundabouts complete the junction complex: the Swavesey Anderson Roundabout that provides local connections to Swavesey to the north via Buckingway Road, and Buckingway Business Park; and the Swavesey Services Roundabout, which has its own off-slip from the A14 westbound carriageway and provides access to the A14 Cambridge Services and Boxworth Road.
- 3.59. The Transport Assessment prepared to support the A14 Cambridge to Huntingdon Improvement Scheme includes an assessment of the operation of the complex of roundabouts at the Swavesey Interchange during the morning and evening peak hour periods for the 2020 and 2035 forecast assessment years examined for the scheme. The assessment shows that in all cases the roundabouts operate well within capacity in both the 2020 and 2035 assessment years and hence should not present a barrier to accessing the development.
- 3.60. It is proposed that access to the site would be off Boxworth Road, via a new priority-controlled roundabout, as shown in Drawing **CAM-ADC-GEN-XX-DR-TR-001-S1-P2**. The section of Boxworth Road between the site access roundabout and the Swavesey Services Roundabout would be widened to 7.3m to accommodate an increase in HGV movements. This would provide the site with quick and direct access to the A14 and the SRN.
- 3.61. Should the site be brought forward in combination with adjacent site OS250 (Land to the south of the A14 Services), then the design of the proposed site access roundabout could be amended to provide only a single access arm into the applicant site, allowing a fourth arm to be added to serve site OS250.
- 3.62. Boxworth Road is subject to a 7.5 tonne environmental weight restriction. This would be relocated to the south of the proposed access roundabout and enhanced by an Automatic Number Plate Recognition (ANPR) enforcement camera system on the site access arms of the new roundabout and on Boxworth Road to the south of the site access. The cameras would record the number plates of all HGVs arriving and departing the site, and these will be matched with the number plates of any HGVs arriving or departing on Boxworth Road to the south. HGV drivers found to be disregarding the environmental weight restriction, will be identified and the relevant site occupier subject to an enforcement regime that would fine registered HGVs.

### Access for sustainable travel modes

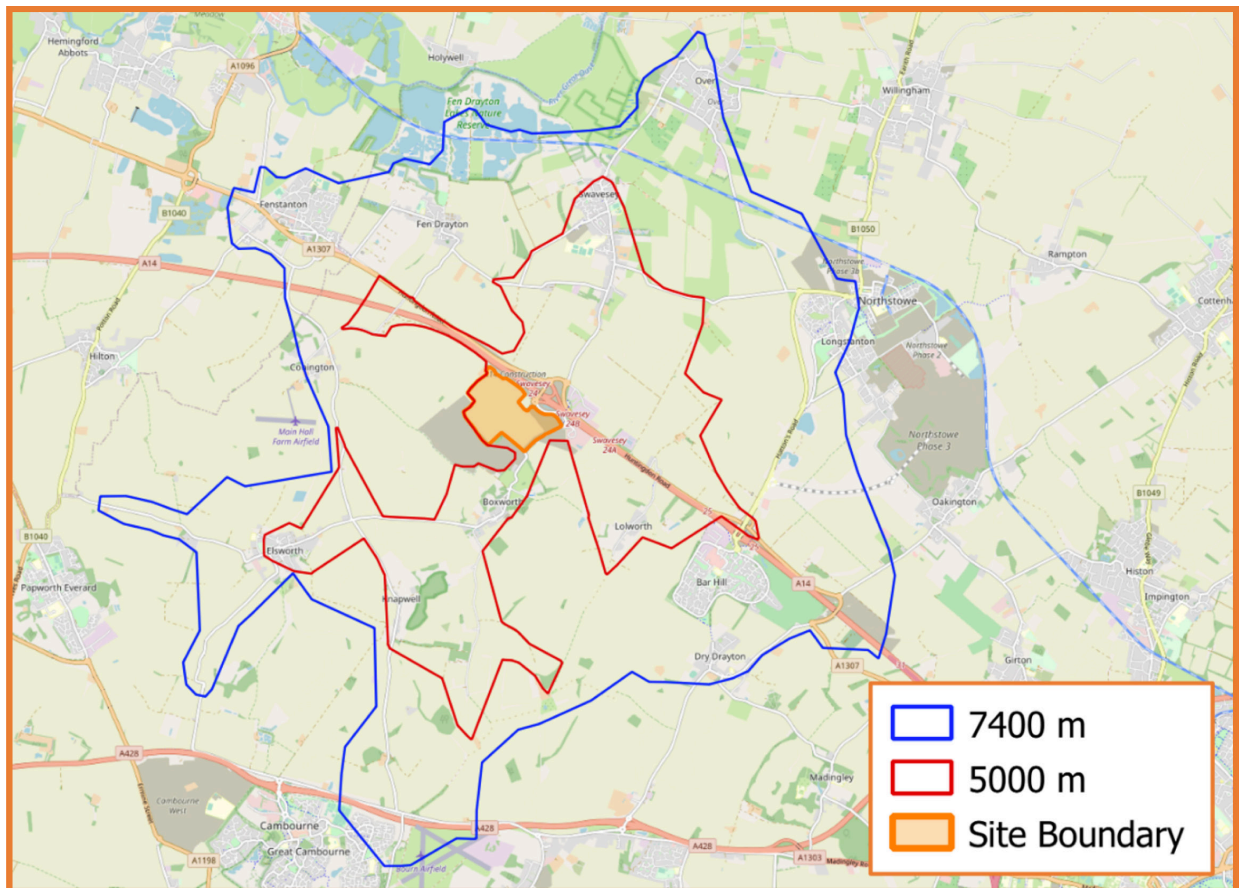
- 3.63. The Council is proposing to allocate land immediately to the east of the site for employment uses and a small extension to the Buckingway Business Park to the north east. On this basis the Councils appear to accept that the location around Junction 24 of A14 is a sustainable location for employment growth.
- 3.64. To facilitate pedestrian and cycle connectivity to the site, the site access junction would provide a 3m wide shared footway/cycleway which would be extended along the northern side of Boxworth Road to tie into the existing footway and new A14 footbridge at the Swavesey Services Roundabout.

- 3.65. **Figure 3.3** shows the cycle routes in the vicinity of the development, including the cycleway running alongside the A14 and offering a direct traffic-free connection to the Northstowe Phase 3a development approximately 7.5km from the site. Part of this connection includes the new footway/cycleway bridge over the A14 between Swavesey Services and the A1307 which allows cyclists to bypass the Swavesey Interchange and would link with the site via the proposed footway/cycleway that would be provided along Boxworth Road as part of the site access strategy. The bridge connects to a 3m wide cycleway on the northern side of the A1307 which runs east to the Bar Hill A14 Interchange, where it will connect to the Northstowe development via a new cycle connection at the B1050.
- 3.66. The figure also shows that there is a cycle lane on Buckingham Road, which extends north toward the village of Swavesey. This route provides an alternative on-road route to reach the National Cycle Network Route 51. NCN51 runs alongside the Guided Busways and locally provides a high-quality cycle connection between Huntingdon, St Ives, Longstanton/Northstowe, and Cambridge. This route would be particularly useful to cyclists travelling to and from the north or west of the site.



**Figure 3.3. Cycle Infrastructure**

- 3.67. Cyclists are typically prepared to cycle up to 5km for non-leisure journeys, such as those to school or work. However, statistics published in the National Travel Survey showed that commuting cyclists typically cycled 23 minutes from their home to their place of work. Guidance also suggests an average cycle speed of 12mph. Combining these two factors, a cyclist travelling at 12mph for 23 minutes will cover a distance of 7.4km. **Figure 3.4** shows a 5km and 7.4km cycle catchment from the centre of the site. The 5km cycle catchment includes the villages of Elsworth, Boxworth, Lolworth, and Swavesey. The 7.4km catchment includes the further settlements of Fen Drayton, Fenstanton, Over, Longstanton, and Bar Hill. The catchment also borders two substantial new residential developments at Northstowe and Cambourne.



**Figure 3.4: Cycle Catchments**

- 3.68. Given the flat topography in the area and the excellent cycle infrastructure between the site and the new Northstowe development, it is proposed that significant support be given to cyclists. This support would include the provision of high-quality cycle parking, showers in each unit, and the provision/encouragement of the adoption of E-bikes for commuting. Typical cycle catchments are 5km and 7.4km, however, E-bikes open up a much wider catchment and offer significant opportunities to encourage modal shift away from cars.
- 3.69. Due to the scale of the development, there is strong potential for employees and visitors to travel to and from the site by bus rather than using the private car. The development would therefore commit to providing and funding a new bus service to the site. It is envisaged that the development could supply a shuttle bus service between the site and Longstanton Park and Ride, travelling via the Northstowe development.
- 3.70. Such a service would be funded by the developer, but potentially run by Cambridgeshire County Council. Journeys to and from Longstanton, via the Northstowe development, would take approximately 20 minutes and would link the development to these residential areas. The link to the Park and Ride site would also facilitate longer journeys via the guided busway from Huntingdon and Cambridge and the surrounding towns.

### Relationship between distribution developments and sustainability

- 3.71. Recent studies by MIT<sup>21</sup> suggest that Carbon emissions from online shopping are on average 36% lower than those produced by in-store shopping. E-commerce was the more sustainable option in more than 75% of the base case trials by MIT. For each scenario, the study used 40,000 trials of a Monte Carlo simulation that modelled a variety of consumer behaviours that, in aggregate, are important indicators of environmental impact: number of items purchased, distance to/from store and logistics facility, returns and type of transport. In addition to the base case, 11 other scenarios were studied which changed an aspect of consumer behaviour or retailer operations.
- 3.72. Consolidating deliveries on a “circular route” reduces transportation-related emissions by almost 90%. Transportation is the largest source of in-store shopping-related emissions and produces 2.5x the carbon emissions of e-commerce packaging, its largest carbon footprint contributor. In the case of direct-to-home delivery, a full standard van can replace more than 100 individual car trips. In turn, order consolidation and network optimization reduce costs for e-commerce operators.
- 3.73. Built-out logistics networks which deliver goods from urban fulfilment centres close to consumers can save some 50% of transport-related greenhouse gas emissions and reduce overall footprint per package by an average of 10%. Placing goods as close as possible to the end consumer minimizes final delivery distances and congestion. This improves delivery times and reduces costs by maximizing delivery fleet load capacities.
- 3.74. In this context, development at the Brickyard Farm site has the potential to reduce greenhouse gas emissions and vehicle movements on the network over the longer term by virtue of locating distribution premises closer to end point customers and reducing first-mile to last-mile distances. This is the case when compared to the Council's proposed policy approach, which is likely to see the growing population of Greater Cambridge relying on logistics space provided further afield in adjacent authorities (i.e. in locations that result in increased first-mile to last-mile distances).
- 3.75. On this basis, despite the site's ‘Amber’ score in the HELAA for ‘air quality’, storage and distribution development, at the site has the potential to give rise to a positive impact on air quality through a global reduction in traffic patterns and emerging renewable energy proposals, which could see fleet vehicles on site fuelled by green Hydrogen produced in the renewable park on site.

### Sustainability

- 3.76. Newlands are seeking to embed sustainability into their development approach for Brickyard Farm, offering a unique proposition from their market competitors. They have entered into an exclusive collaboration agreement with renewable energy engineers, Chelveston Renewable Energy, to enable the latest renewable energy technology to be integrated in the proposed scheme such that it will generate more than its own power needs, allowing surplus green energy to be put back into the National Grid.
- 3.77. A range of technologies are being explored for the proposed scheme, these include:
- 3.78. Roof mounted solar arrays. Chelveston have deployed a new roof mounting system into their own developments by making amendments to building design and roof pitches. This has enabled roof mounted solar panels to be more efficient by increasing the amount of sun they can harvest whilst keeping the panels clean by mounting them at an optimum angle. This system would be utilised across the proposed buildings.
- 3.79. Ground mounted solar arrays. To maximise the onsite generation opportunities an area has been designated for ground mounted solar to be incorporated amongst landscaped areas. Alongside the ground mounted solar as at CREP, sheep would be grazed to increase overall biodiversity across the scheme and to allow the grass to be kept down below the solar arrays.
- 3.80. Battery storage. Chelveston are commissioning on-site battery storage alongside their solar arrays to enable energy to be stored and then deployed at times when demand exceeds onsite generation. Chelveston have partnered with a UK car manufacturer to develop technology that will utilise second life car batteries. These technologies are being incorporated into the design proposals at Brickyard Farm to be co-located alongside both ground mount and roof mounted solar.

21 <https://www.prologis.com/news-research/global-insights/logistics-real-estate-and-e-commerce-lower-carbon-footprint-retail>

- 3.81. Whilst the options are still being explored, the emerging draft Parameter Plan enclosed with these representations shows how renewable energy could potentially be incorporated into the scheme and be set within high quality landscaping and green infrastructure. The renewable energy proposals not only support the operation of the site but also offer the potential opportunity to serve the requirements of other developments in the area. As such, we consider the development proposals are a unique proposition and are unlikely to be replicated elsewhere in Greater Cambridge.
- 3.82. As above, the proposed approach to renewable energy and sustainability, suggests that the Council's 'score' for the site in respect of air quality ought to be adjusted to 'green'.

### **Flood Risk and Drainage**

- 3.83. According to EA's flood map, the site is entirely within Flood Zone 1 and therefore at a low probability of flooding. In terms of surface water flooding, 2% of the site lies in a 1 in 30 year event, 5% lies in a 1 in 100 year event and 20% lies in a 1 in 1000 year event. As such, we consider that flood risk does not present a significant or insurmountable constraint to the site's development.
- 3.84. The forthcoming hybrid planning application on site would be supported by a robust Flood Risk Assessment and Drainage Strategy which would demonstrate that the proposals would be safe for its lifetime and would not increase flood risk elsewhere. At this stage it is anticipated that a comprehensive network of Sustainable Drainage measures (i.e. SUDs), including areas of surface water attenuation, are likely to be incorporated within the site layout at application stage. Therefore, once mitigation is taken into account we see no reason why the site should not score 'green' in terms of flood risk in the Councils' site assessment.

### **Heritage Impacts**

- 3.85. A review of Historic England's map search facility reveals that the site is not subject to any significant heritage constraints. There are no listed buildings on site, and it does not fall within a Conservation area.
- 3.86. With regards to the area surrounding the application site, we note there are a number of scattered heritage assets within Boxworth (to the south), including a number of ecclesiastical Grade II Listed buildings as would be expected in a small village, as well as Grade II Listed farmhouses. Further south we note there is a scheduled monument in the form of a 'Overhall Grove Moated Site'. However, it is considered that by virtue of the separation between them, the development proposals are unlikely to have any material impact on these heritage assets.
- 3.87. The above assessment of the historic environment is echoed in the LPA's assessment of the site in Appendix 4 of the HELAA and reinforces the notion that heritage is unlikely to present a significant constraint to the development of the site.
- 3.88. With regards to archaeology, we note that the Council's assessment suggests that the site is located in a landscape of cropmarks of late prehistoric and Roman settlement and associated activity. Archaeology would be suitably explored further at application stage but is unlikely to be significant constraint to development and there is no reason to believe that the site could not be scored green following investigation.

### **Ecology and Arboriculture**

- 3.89. The site does not appear to fall within or adjacent to any designated habitats. We note that the Overhall Grove SSSI is located approximately 2 kilometres to the south of the site, and the outer-most limits of the SSSI Impact Zone would appear to fall immediately adjacent the site boundaries. As such, it is considered that the site is not particularly sensitive in ecology terms. However, the necessary surveys are being undertaken in advance of the submission of a hybrid application to ensure there is robust ecological mitigation measures and biodiversity gain are achieved on site where possible.
- 3.90. As would be expected for an existing agricultural site, the boundary treatment is largely formed of mature, native hedging which the development proposals will look to retain and supplement, where possible. There are two ancient woodland blocks immediately bordering the site. Appropriate buffer planting would be provided along with an emphasis on providing a GI framework with a mosaic of habitats proposed to both screen and establish green linkages throughout the development to integrate the proposal within the wider landscape.



- 3.91. On this basis, with appropriate mitigation and enhancements measures, we see no reason why the site should not score 'green' in the Council's assessment.
- 3.92. Overall it is considered that the site is suitable, available and achievable for large-scale employment development, including storage and distribution, research and development and light industrial uses, and an associated renewable energy park.

### Summary of Scheme Benefits

- 3.93. The development would provide a range of benefits for the local area including:
- **Social Benefits**
    - The creation of training opportunities for local people during the construction and operational phase enabling people to up-skill and gain qualifications.
    - Well-being benefits for employees related to the creation of a high-quality sense of place.
  - **Economic Benefits**
    - Major investment to drive the economic recovery from COVID-19 and build economic resilience.
    - The delivery of high quality commercial property capable of attracting high growth sectors to Greater Cambridge.
    - The creation of a significant number of jobs during the construction phase.
    - The creation of a substantial number of new long-term jobs, a large proportion of which are likely to be taken up by local people living within 15km of the site and will be in well paid sectors.
    - The diversification of the local job market opening up opportunities for lower skilled and paid workers to develop and train for jobs requiring intermediate level of skills.
    - Substantial Gross Value Added generation for the local economy, improving local prosperity.
    - Meet a latent and growing demand for logistics space in Greater Cambridge.
    - Significant fiscal benefits for Greater Cambridge, including business rates revenue.
    - CIL & S106 contributions towards infrastructure improvements.
  - **Environmental Benefits**
    - The provision of a shuttle bus and access to E-bikes would mean that the employment opportunities are available to all without reliance on the private car, reducing environmental impacts.
    - The unique renewable energy proposition would deliver a truly sustainable scheme that is also able to supply surplus green energy to the National Grid.
    - Locate logistics and distribution space in an area that will minimise first-mile to last-mile distances with potential associated environmental improvements.
    - The creation of a high quality network of green infrastructure with the potential to deliver net gains for biodiversity and increase tree canopy cover.

**Changes Requested:**

- **That the Council recognise the substantial benefits and unique combination of opportunities presented by the Brickyard Farm site by identifying it as a proposed allocation in the emerging Local Plan.**
- **The Councils' assessment of the site in the HELAA be adjusted to reflect the information supplied above.**

# NEWLANDS DEVELOPMENTS

BRICKYARD FARM, BOXWORTH

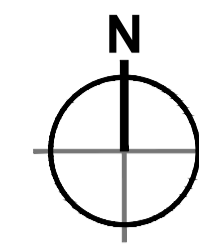
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## APPENDIX 1

*EMERGING DRAFT PARAMETER PLAN*

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- Dimensions are in millimeters, unless stated otherwise.  
 - Scaling of this drawing is not recommended.  
 - It is the recipient's responsibility to print this document to the correct scale.  
 - All relevant drawings and specifications should be read in conjunction with this drawing.



**Key**

- Application Boundary
- Zone Boundary
- Development Area [B8]
- Development Area [E-Class]
- Renewable Park
- Proposed New Solar Array
- Estate Road Infrastructure [Indicative Only]
- Structural Landscaping
- Strategic Landscape Screening [Subject to detailed Survey]
- Proposed Surface Water Attenuation
- Proposed new main site access Via A14 J24 / Boxworth Road
- Existing Water-main [10m Easement] [Alignment Subject to Survey]
- Diverted Water-main [7m Easement] [Subject to Water Authority Agreement]
- Existing Water-main Abandoned [Subject to Water Authority Agreement]
- Diverted Water-main [Alternative Routing] [Subject to Water Authority Agreement]
- Existing Gas Main to be Retained [Alignment subject to detailed survey]

Development Schedule				
Zone	Plot Size NDA (ha)	Maximum GEA Floor Space (m <sup>2</sup> ) (based upon 40% density)	Minimum Finished Floor Level (in meters above ordnance datum) [+1.000m above proposed plateau]	Maximum Building Height Measured to roof ridge / highest point (in meters above ordnance datum)
Zone 1 [B8]	7.32	29,262 (TBC)	18.750	33.750
Zone 2 [B8]	8.86	35,441 (TBC)	22.365	42.365
Zone 3 [B8]	9.82	39,272 (TBC)	18.750	33.750
Zone4 [E-Class]	16.54	66,158 (TBC)	22.365	37.365
Zone 5 [Wykes]	4.05			
Total	42.53	170,133 (TBC)		

Attenuation and Infrastructure design subject to confirmation

rev amendments by ckd date

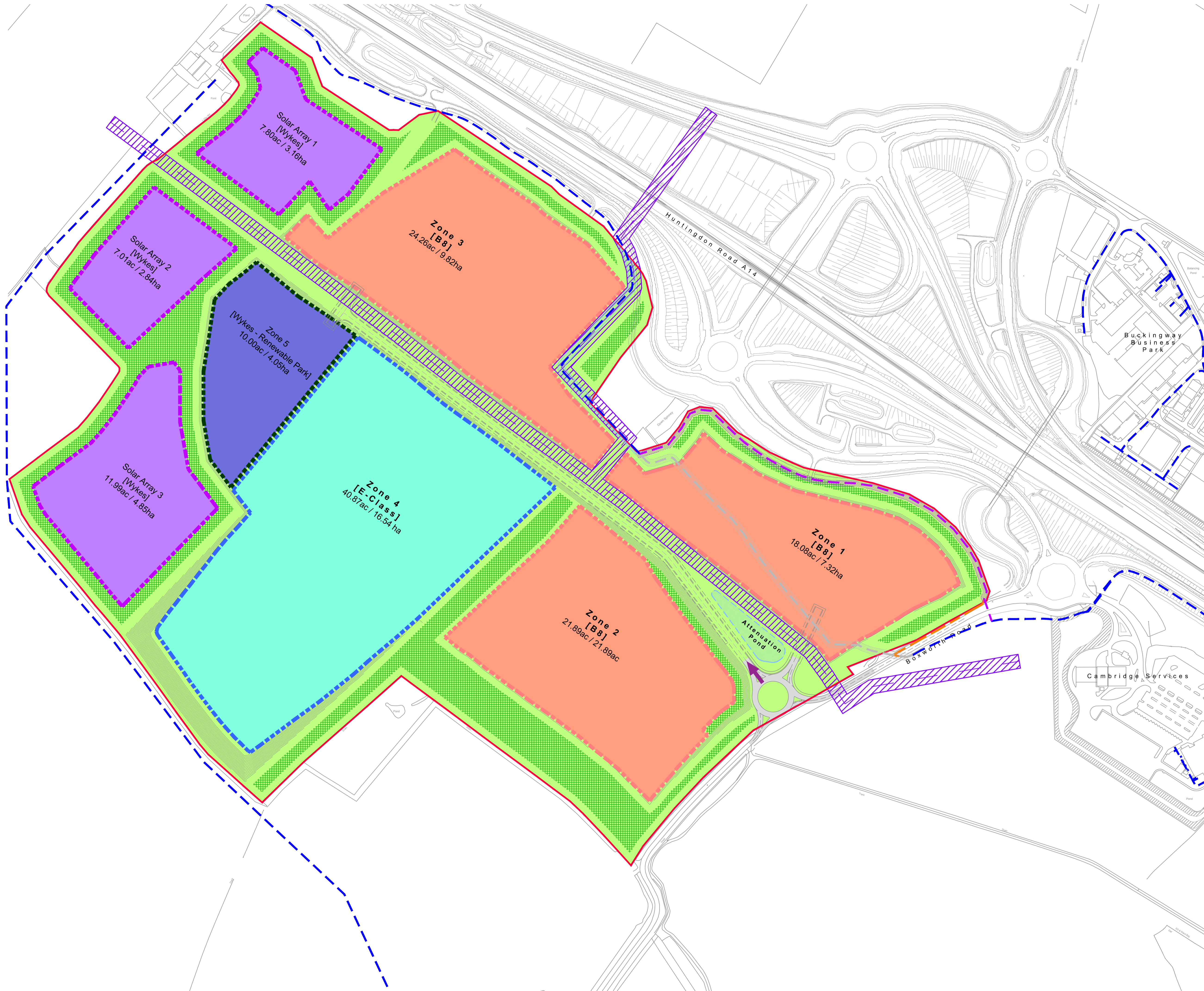
Cambridge Gateway, Boxworth Parameters Plan



Newark Beacon Innovation Centre, Cafferata Way, Newark, Nottinghamshire NG24 2TN  
 o: +44 (0)1636 653027 f: +44 (0)1636 653010 e: info@umcarchitects.com

Drawing Status: Feasibility  
 Drawn / Checked: RT / MDS  
 Date: 05/11/21  
 Scale: 1:2500 A1

Drawing no: 19260 F0042  
 Revision: B



50m SCALE 1:2500

# NEWLANDS DEVELOPMENTS

BRICKYARD FARM, BOXWORTH

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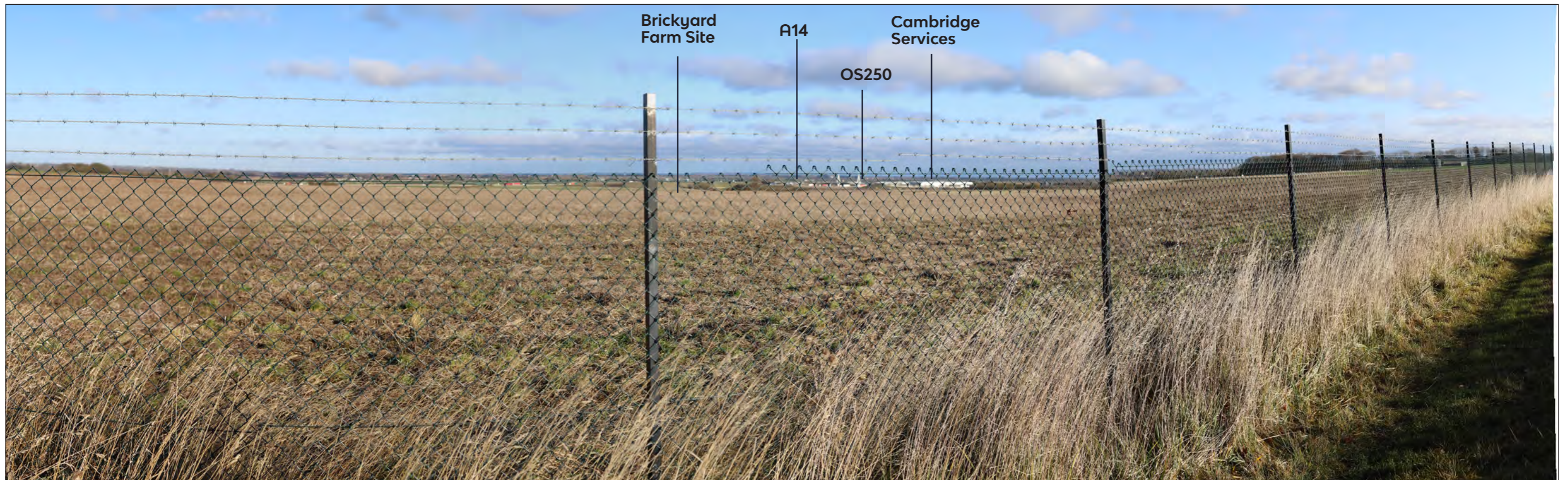
## APPENDIX 2

*PHOTOVIEWPOINTS AND ZTV*

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**Photoviewpoint 1** Looking North from the Pathfinder Long Distance Walk



**Photoviewpoint 2** Viewpoint looking North from the Pathfinder Long Distance Walk



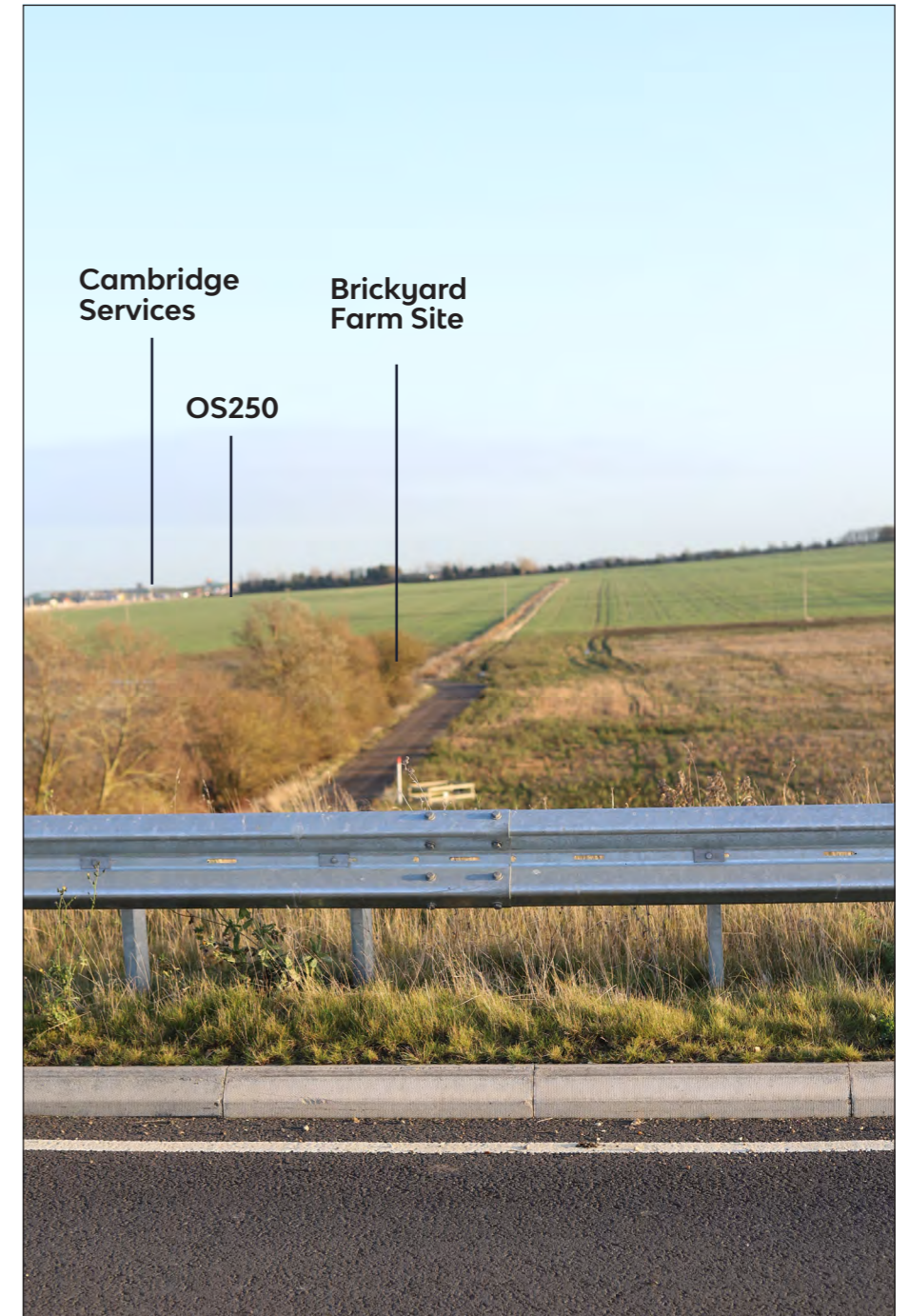
<b>Project No:</b>	13784	<b>Date:</b>	December 21	<b>Drawing Title</b>	Site Context - Photographs
<b>Client:</b>	Avison Young	<b>Project:</b>	Cambridge Gateway, Boxworth	<b>Drawing No</b>	13784/P11
<b>Status:</b>	Planning	<b>Figure:</b>	Data Sheet	<b>Checked</b>	MP/JH



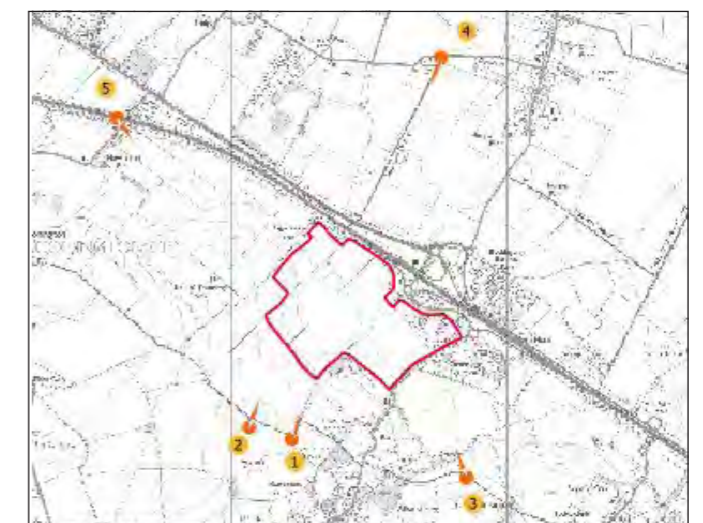
**Photoviewpoint 3** Viewpoint looking North West from the Pathfinder Long Distance Walk

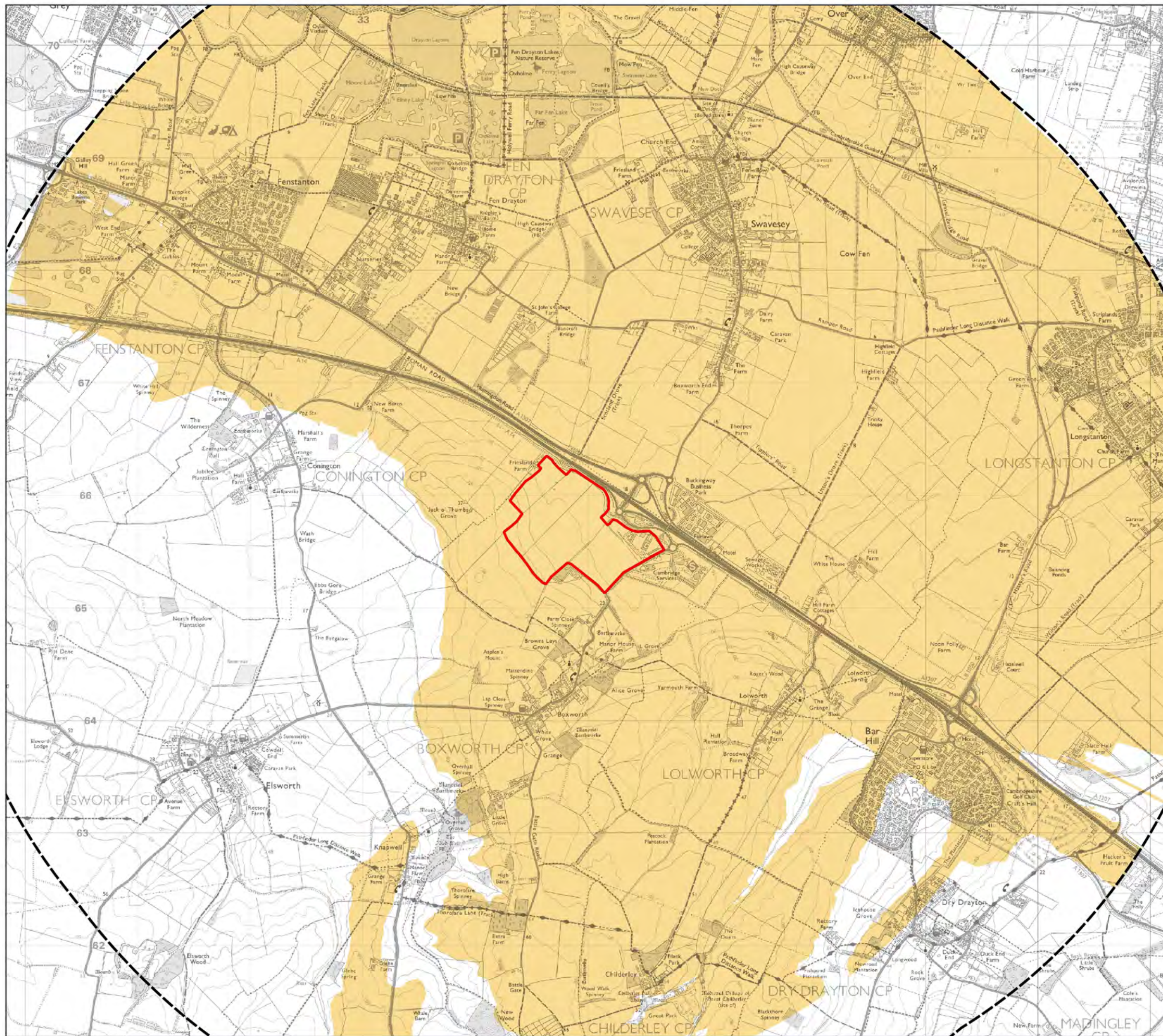


**Photoviewpoint 4** Taken looking South from Scotland Drive (Track)



**Photoviewpoint 5** New Barns Road overbridge to A14

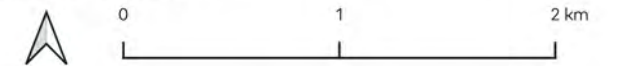




-  Site Boundary: Brickyard Farm site
-  5km Buffer
-  Zone of Theoretical Visibility (ZTV)
-  Potential Visibility

**Notes:**

Augmented ZTVs are computer generated from a digital terrain model of the 5km radius study area (using OS Terrain 5 at 5m resolution) with a 3D model of the proposed development inserted at 15m above existing ground levels. These show the theoretical visibility of the Development throughout the study area based on the average eye height of an adult (taken as 1.6m). This considers the screening effects of buildings and woodland in excess of 3m high (identified from OS Vector Map District Data) however it does not account for hedgerows, individuals and groups of smaller trees and other scattered scrubby vegetation in the study area and the fact that features become recessive with distance. Therefore the actual visibility of the proposal is likely to be much less than indicated – especially when factoring in additional filtering effects of field boundary hedgerows

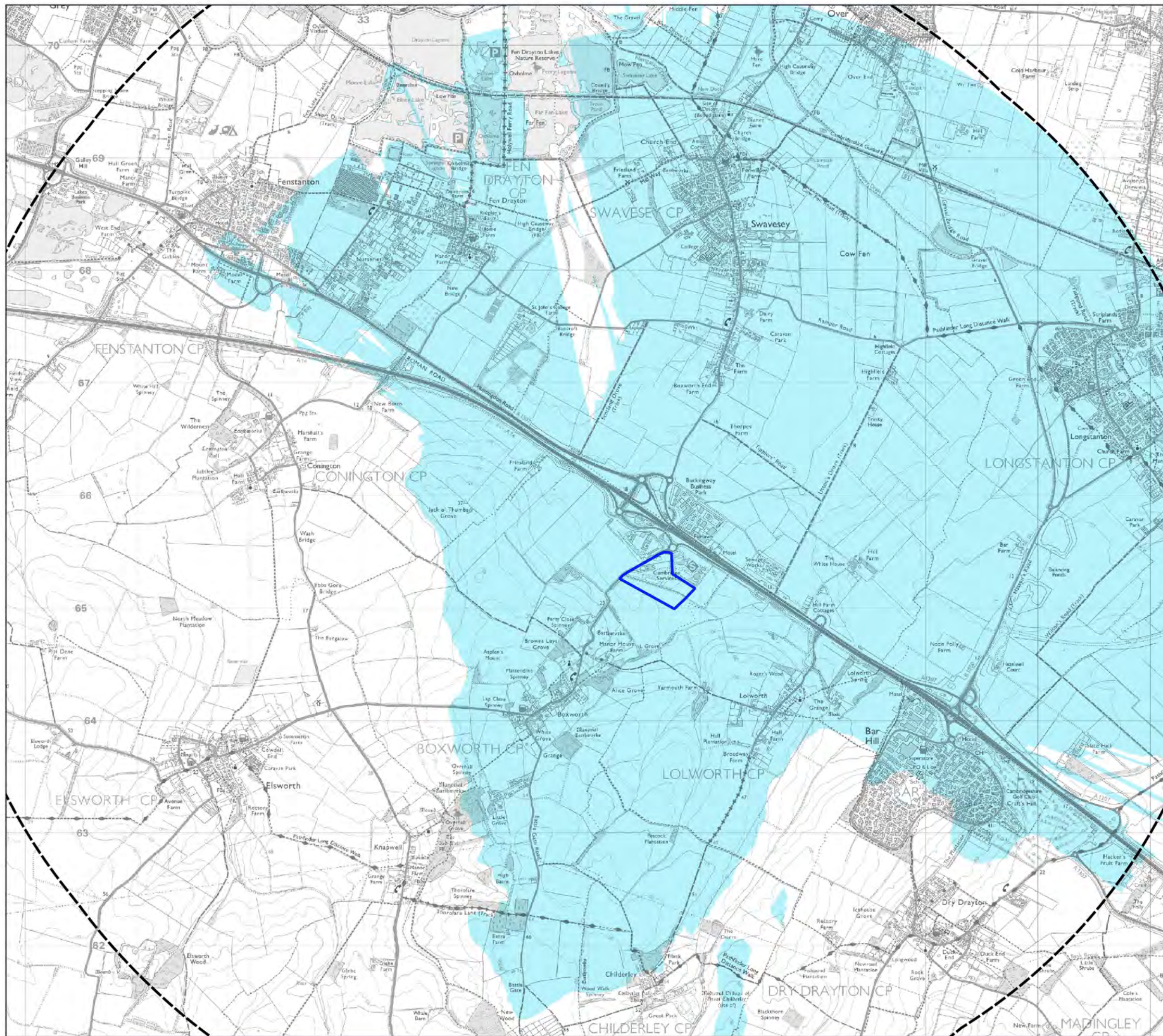






Project	Cambridge Gateway, Boxworth
Drawing Title	Zone of Theoretical Visibility (ZTV) Brickyard Site, Land South of the A14 Ref: 4753
Scale	1:35000 @A3
Drawing No.	13784/P10.1
Date	November 2021
Checked	MP/JH
CDM Review	MP/JH



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 T: 020 395 494 70 E: info@tylgrange.co.uk W: www.tylgrange.co.uk

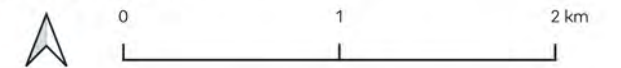




-  Land South of the A14 Cambridge Services
-  5km Buffer
-  Zone of Theoretical Visibility (ZTV)
-  Potential Visibility

**Notes:**

Augmented ZTVs are computer generated from a digital terrain model of the 5km radius study area (using OS Terrain 5 at 5m resolution) with a 3D model of the proposed development inserted at 15m above existing ground levels. These show the theoretical visibility of the Development throughout the study area based on the average eye height of an adult (taken as 1.6m). This considers the screening effects of buildings and woodland in excess of 3m high (identified from OS Vector Map District Data) however it does not account for hedgerows, individuals and groups of smaller trees and other scattered scrubby vegetation in the study area and the fact that features become recessive with distance. Therefore the actual visibility of the proposal is likely to be much less than indicated – especially when factoring in additional filtering effects of field boundary hedgerows



Project	Cambridge Gateway, Boxworth
Drawing Title	Zone of Theoretical Visibility (ZTV) for Land South of the A14 Cambridge Services Ref: OS250
Scale	1:35000 @A3
Drawing No.	13784/P10.2
Date	November 2021
Checked	MP/JH
CDM Review	MP/JH



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# NEWLANDS DEVELOPMENTS

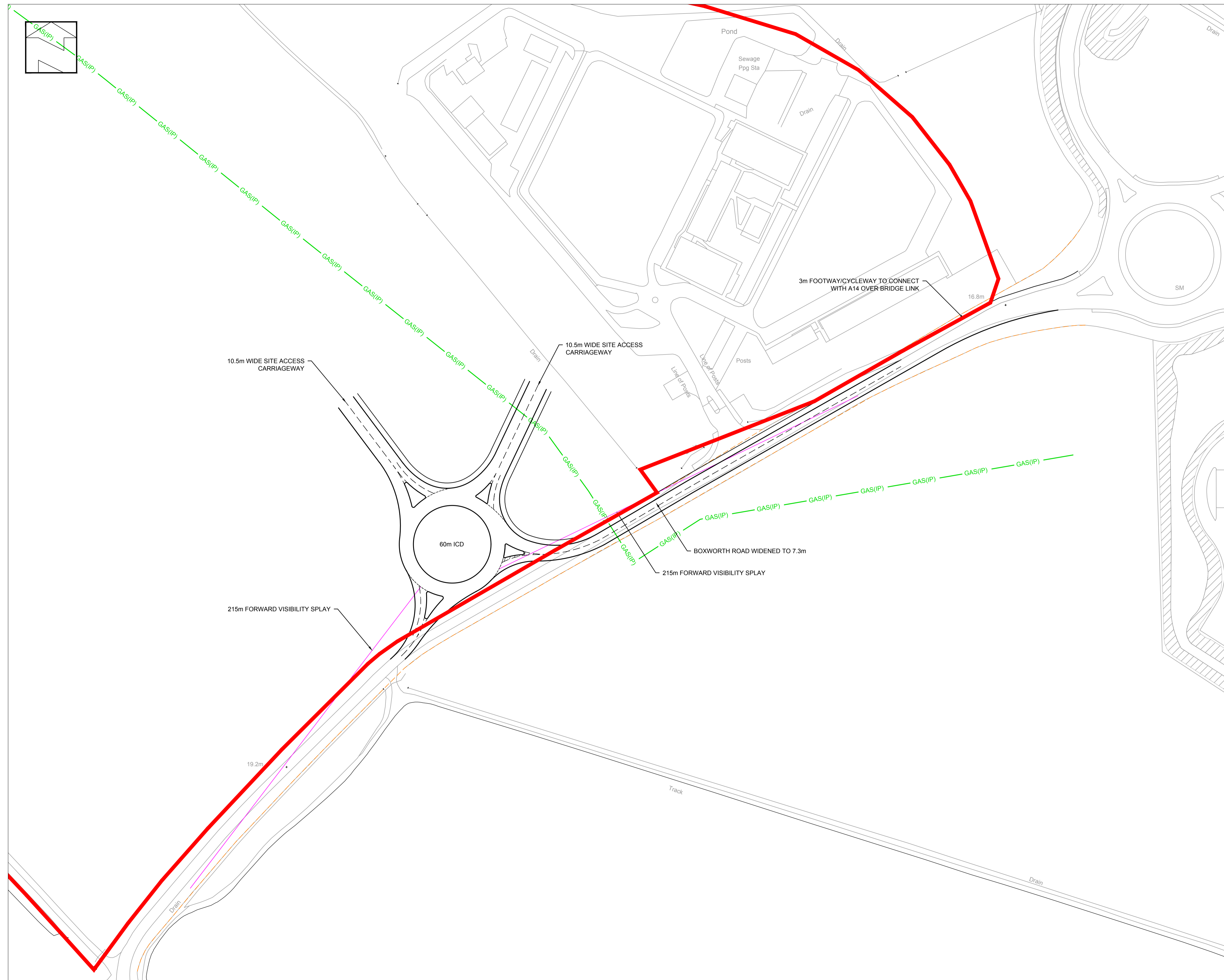
BRICKYARD FARM, BOXWORTH

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## APPENDIX 3

GENERAL ACCESS ARRANGEMENT DRAWING

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- - - CCC HIGHWAY BOUNDARY
- INDICATIVE SITE BOUNDARY

P2	Updated Visibility	23/03/21
Rev	Description	Date

Client:

Project:  
Brickyard Farm,  
Cambridge

Title:  
Access Junction Layout  
Boxworth Road

ADC Ref: ADC2303	Drawn: M. Tatler	Reviewed: S. Dunhill
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Drg Size: A1	Scale: 1:1000	Date: 14/09/2020
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Project - Originator - Zone - Level - Type - Role - Number	Status	Rev
CAM-ADC-GEN-XX-DR-TR-001	SO	P2