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**Date:** 13 December 2021

**Our ref:** 63559/01/SB/CGJ/JHy/20459936v5

**Your ref:**

Dear Sir/Madam

## **Greater Cambridge Local Plan: Preferred Options (Regulation 18)- Representation on behalf of Lolworth Developments Limited**

We write on behalf of our client, [REDACTED] to make a representation to the Greater Cambridge Local Plan: First Proposals (Preferred Options) (Regulation 18) ('GCLPPO') which runs until 13 December 2021.

We write further to our letter of 7 September 2021 ahead of the Joint Local Planning Advisory Group ('JLPAG') meeting held on 8 September 2021, and our 'Review of Logistics in Greater Cambridge Briefing Note' shared with the Council via email on 26 November 2021.

[REDACTED]

As set out in our earlier correspondence, [REDACTED] a subsidiary of [REDACTED], is promoting **J25 Bar Hill** (previously referred as Land at Slate Hall Farm), on the north side of the new Junction 25 of the A14 (see Call for Sites Form ID: 40248), for a **leading edge sustainable employment park development** with business and logistics capability and capacity. The proposed site is responsive to the employment need and demand across the area, benefits from excellent strategic accessibility, and suitability outside of the Green Belt, and is well located relative to proposed new residential developments.

### **Structure of Representation**

This representation is set out to follow the structure of the form provided to guide responses to the detailed policies in the First Proposals. As requested, we have also submitted these responses via the online consultation system. We have also included a number of appendices comprising:-

- **Appendix 1:** Employment Land Need and Demand Review Assessment
- **Appendix 2:** Greater Cambridge's HELAA Site Assessment ref.40248
- **Appendix 3:** Lichfields' HELAA Site Assessment Update
- **Appendix 4:** HELAA Technical Appraisal Reports, including:-
  - i Flood Risk Technical Appraisal Report, prepared by MJM Consulting Engineers

- ii Landscape and Townscape Technical Appraisal Report, prepared by FPCR
- iii Biodiversity and Geodiversity Technical Appraisal Report, prepared by FPCR
- iv Historic Built Environment Technical Appraisal Report, prepared by RPS
- v Archaeology Technical Appraisal Report, prepared by RPS
- vi Accessibility to Services and Facilities Technical Appraisal Report, prepared by Vectos
- vii Site Access Technical Appraisal Report, prepared by Vectos
- viii Transport and Roads Technical Appraisal Report, prepared by Vectos
- ix Noise, Vibration, Odour and Light Pollution Technical Appraisal Report, prepared by Sharps Redmore
- x Air Quality Technical Appraisal Report, prepared by Redmore Environmental
- xi Contamination and Ground Stability Technical Appraisal Report, prepared by MJM Consulting Engineers
- xii Strategic Highways Impact Technical Appraisal Report, prepared by Vectos
- xiii Agricultural Land Survey and Map, prepared by Ministry of Agriculture, Fisheries and Food

## **Policy Commentary**

### **Duty to Cooperate Statement and Statement of Common Ground**

The National Planning Policy Framework (NPPF) Paragraph 24 identifies that, *“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*

Pg.43 of the supporting text of the GCLP identifies that:

*“In preparing our evidence informing the preferred strategy we have engaged with relevant organisations under the legal duty to cooperate on plan making, to ensure we have fully considered strategic cross-boundary matters. The engagement we’ve completed to consider these strategic issues is set out in our Duty to Cooperate Statement of Compliance, and our current position on each substantive issue is set out in our draft Statement of Common Ground. The water supply challenge addressed above is a serious issue to be resolved. Apart from this, we are not currently aware of any unresolved strategic cross-boundary matters that would prevent the preferred strategy from being delivered. However, should it be proven that we cannot deliver our strategy because of any reason later in the plan process, then we will need to talk with our neighbours. We will continue to engage with all relevant organisations as we take the plan forward.”*

Having reviewed the Duty to Cooperate Statement in detail, we identify that there is reference to the potential implications of unmet employment needs under the Strategy ‘Strategic Topic’ (Appendix 4, pg.138 of the Statement) and the Councils’ discussion on 16<sup>th</sup> September 2020 as reported within the Statement. Of note, during that discussion as a key point was reported the *“need to explore the implications of emerging Greater Cambridge economic evidence in relation to the CPIER”*. At the same meeting, under the Transport ‘Strategic Topic’, it was also reported that *“Employment land, linking to ideas about distribution hubs...”* and the need for this to be discussed at the next meeting.

Although it appears that the issue of accommodating unmet employment needs across the area was raised within the context of this meeting, there is no further reference to this matter following that discussion. In contrast, the First Proposals Statement of Common Ground states (at pg.7) that: *“Sufficient development*

- ii Landscape and Townscape Technical Appraisal Report, prepared by FPCR
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*commitments and new sites exist to accommodate these growth levels within Greater Cambridge without the need to request that one or more neighbouring authorities should assist under the duty to cooperate.”*

As we discuss further below, in our view, at that stage the appropriate evidence on employment land needs was not available in order to inform any meaningful discussion between Greater Cambridge Councils and surrounding authorities in relation to meeting strategic employment needs.

We do expect that the Councils will need to update their evidence and undertake a further round of discussions with the adjoining authorities to identify the appropriate levels of employment land across the Plan period as part of Local Plan Regulations 19. Lack of a clear and agreed evidential basis in terms of both informing and fulfilling the requirements of the Duty to Cooperate could represent a fundamental failing of the emerging Local Plan. Accordingly, it is paramount that these issues be properly addressed at Local Plan Regulation 19 Stage.

## **Sustainability Appraisal**

The NPPF para 32 identifies that:

*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*

The GCLP First Proposals have been subject to Sustainability Appraisal which considers the preferred options in the First Proposals and reasonable alternatives (see pg.19 of supporting text). The GCLP concludes that:

*“drawing on our evidence and consultation feedback, alternatives to our preferred option would either distribute development to less sustainable locations that are distant from Cambridge or without the benefit of very high quality public transport (existing or proposed) that would generate greater car use contrary to our climate change theme, or would require the release of large areas of Green Belt on the edge of Cambridge which would cause significant harm to the purposes of the Cambridge Green Belt. Full information regarding the testing of these alternatives can be found in the Sustainability Appraisal accompanying the First Proposals.”*

However, having reviewed the Sustainability Appraisal, we consider that the Appraisal fails to properly assess options in relation to employment land requirements under the following objectives:

- SA 12.6: Does the Plan support development which is in close proximity to city, district and rural centres, services and facilities, key employment areas and/or public transport nodes, thus reducing the need to travel by car?
- SA 14.1: Does the Plan provide for an adequate supply of land and the delivery of infrastructure to meet Greater Cambridge’s economic and employment needs?
- SA 14.2: Does the Plan support opportunities for the expansion and diversification of businesses?
- SA 14.5: Does the Plan support stronger links to the wider economy of, and contribute to meeting sustainable economic growth envisaged across, the Oxford-Cambridge Arc?
- SA 15.1: Does the Plan provide for employment opportunities that are easily accessible, preferably via sustainable modes of transport?

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- SA 15.1: Does the Plan provide for employment opportunities that are easily accessible, preferably via sustainable modes of transport?

As we set out in more detail below, we consider that the existing employment evidence is not sufficiently robust as it fails to provide a full and objective assessment of distribution and industrial needs. In the absence of this, the GCLP Sustainability Appraisal assesses the emerging Policy J/NE: New employment development proposals with “No Policy” as the only alternative option (SA, pg.322). Given the requirements of para 83 of the NPPF to plan “...for storage and distribution operations at a variety of scales and in suitably accessible locations”, we are not convinced that “no policy” can be regarded as either a legitimate or single alternative option for the purposes of appraising the Local Plan. We would expect that the Sustainability Appraisal of the Local Plan Regulation 19 will assess appropriately the alternative options of the emerging Policy J/NE and any other policy in relation to strategic employment requirements and land supply.

### **Policy S/JH: New jobs and homes**

The emerging *Policy S/JH: New jobs and homes* identifies that the GCLP will provide 58,500 new jobs over the Plan period from 2020 to 2041.

The Greater Cambridge Employment Land Review & Economic Development Evidence Study (the ‘2020 ELEDES’), which has informed the emerging proposals, concluded that the recommended lower and upper forecast range referred to as central growth (+58,400 jobs) and higher growth (+78,700 jobs), respectively, “should be used for Local Plan purposes”. However, paragraph 6.33 in the 2020 ELEDES states that:

*“It is recommended that in planning positively for growth, the KS2 Higher Scenario is planned for regarding B1a/b floorspace, without making any implied assumptions regarding jobs growth [Lichfields’ emphasis]. This is recommended to ensure a flexible employment land supply encouraging growth in existing businesses and attracting inward investment. It also broadly aligns with completions trends and market feedback.”*

Of note, the higher growth (i.e. recommended scenario) relates to an additional 78,700 jobs across the plan period (see 2020 ELEDES paragraph 6.11, pg.97). Therefore, there is an internal inconsistency across the Local Plan and its supporting evidence, and it is not clear how the recommended higher growth scenario of 78,700 jobs has been translated into the Local Plan’s lower provision of 58,500 jobs.

It should be also highlighted that the labour demand scenario is used to inform the employment space requirements for office and R&D uses, while light industrial, general industrial and storage and distribution space requirements have been based on the past trends scenario, and particularly a projection of the annual net completions between the monitoring years of 2011/12 and 2017/18, which is considered a very short period of time to inform policy recommendations over the next 20 years.

According to the 2020 ELEDES Table 10 (pg.94), the job growth associated with “2011-17 annual average change”, which is understood to reflect the recommended scenario for the industrial/warehousing uses, equates to 125,200 jobs across all sectors for the 2020 to 2041 period. There is no available data provided in terms of how these jobs are distributed across the various employment segments. As a result, there is no transparent evidence of how the proposed jobs growth is distributed across the various employment space types and on this basis, we consider that the evidence in relation to jobs growth estimation lacks transparency and robustness.

Moreover, it is understood that the estimation of the office and R&D jobs growth is based on a series of forecasts highlighting a policy-on view on how those sectors (which are considered historically as the key drivers of the local economy) are expected to grow further. The emphasis on office-based segments appears

to characterise the approach in the Local Plan as a whole, and which therefore does not acknowledge the importance of other economic sectors, including logistics and industrial-based activity.

Furthermore, paragraphs 6.36 to 6.37 state:

*“6.36 The labour demand forecasts for B1c/B2 floorspace should be viewed cautiously. Recent completions trends show a slow down in light / heavy industrial floorspace loss as the manufacturing and related sector of the economy stabilises after a period of decline. Market feedback suggests demand for light industrial floorspace which is reflected in gains in South Cambridgeshire and market pressure in Cambridge [Lichfields emphasis]. It is recommended that industrial floorspace losses are limited in the city to avoid constraining business and industrial activity. In reality there may be some further losses in Cambridge, which should be minimised, but gains in South Cambridgeshire are expected regardless.*

*6.37 Similarly, with B8 warehousing needs, the completions trends show a higher level of floorspace than the labour demand model with losses in Cambridge and gains in South Cambridgeshire. The logistics sector is experiencing a high level of change due to increases in e-commerce and greater levels of automation particularly in larger units [Lichfields emphasis]. This may change the relationship between labour requirements and floorspace needs. Given delivery has been steady in South Cambridgeshire across the tested completion periods whilst losses have increased in Cambridge and are likely to continue, it is recommended that the recent net trends are planned for.”*

Although the evidence demonstrates clearly that there are specific market signals showing ‘market pressure’ in Cambridge City together with demand for larger units as e-commerce increases and automation evolves, both the evidence and the emerging policies choose to ignore these signals and are driven by policy choices to focus on the office-based economy. This is contrary to:

- NPPF Paragraph 81: ‘Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development’,
- NPPF Paragraph 82 ‘planning policies should: d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices...and to enable a rapid response to changes in economic circumstances’; and
- NPPF Paragraph 83 that sets the requirement for the policies to recognise and address the specific locational need of (inter-alia) storage and distribution operators at a variety of scales and in suitably accessible locations.

Therefore, we conclude that the evidence that informs the emerging policy over the next twenty years is not proportionate nor is it objective. This contradicts with NPPF Paragraph 35 point ‘a) Positively prepared’ that requires the plans ‘to seek to meet the area’s objectively assessed need’ and point ‘b) Justified’ that requires ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’.

Lichfields has reviewed the existing evidence and prepared an updated analysis in relation to logistics requirements across the Plan period in Greater Cambridge (Appendix 1). Based on our analysis, there are various inconsistencies and deficiencies within the Councils’ evidence that, in our view, means the anticipated B8 and the combined E(g)(iii)/B2/B8 requirements and jobs growth are significantly underestimated.

In particular, both jobs scenarios of 58,400 or 78,700 additional jobs across the Plan period suggest that over the next 20 years B8 jobs will grow by 457 jobs or 21.7 jobs per annum, while the combined E(g)(iii)/B2/B8 equivalent will decrease by 1,339 jobs or by -63.7 jobs per annum across the Plan period (Table 13, pg.99). This contradicts the market signals and recent activity that highlight pressures to identify additional

employment land in Greater Cambridge to avoid losing businesses that want to either invest or expand in the area.

Lichfields' updated assessment of logistics land requirements (as set out in Appendix 1) suggests that additional B8 job growth of around 3,100 jobs to 5,700 jobs should be anticipated across the Plan period, once the strategic logistics requirements are considered as identified by NPPF and PPG.

As a result, it is not considered that the emerging policy is soundly-based. There is need for the supporting evidence to objectively and robustly identify employment requirements across office, industrial and storage and distribution uses rather than taking a policy-on view that largely focuses on office growth and does not adequately assess the needs arising for other segments of the economy.

### **Policy J/NE: New employment development proposals**

The emerging Policy J/NE New employment development proposals sets out whether proposals for employment uses within Classes E(g), B2 and B8 will be supported. According to the emerging policy, such developments will only be allowed at sites set out in the Proposed Policy S/DS: Development strategy, within towns and villages where it is of an appropriate scale, in a list of 'established employment areas in the countryside' or where expansion of existing businesses fulfil a number of criteria (described in the justification). The emerging policy, then, states at the end that *"Large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge"*.

From our review, it appears that this approach has been justified by the following paragraph:

*"A need for additional space for warehousing and distribution (Use Class B8) was identified in the Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) and potential sites are proposed to be allocated (see the Strategy section of this consultation). However, whilst we need to meet the needs for local distribution, as a central location the area may be desirable to national distributors. Given the very high land take of this type of use, the local pressures on land supply for a range of uses, and the greenbelt location, it is proposed that the plan continues to not support large scale regional and national distribution proposals."*

The 2020 ELEDES that underpins the emerging Policy J/NE identifies a combined office, R&D, industrial and storage and distribution need of about 664,300 sq.m, of which just over 46,930 sq.m relates to storage and distribution uses (within B8 Class). When these figures are compared with the identified supply position, it results in a shortfall of 24,470 sq.m for storage and distribution space, and a combined shortfall of c.76,940 sq.m for the industrial and distribution space across Greater Cambridge to 2041 according to the Council's evidence.

A detailed review by Lichfields of the 2020 ELEDES (as set out in Appendix 1) indicates a number of deficiencies in the evidence which has been produced, which we consider point to a significantly greater level of need for B8 storage and distribution floorspace in Greater Cambridge than is recommended in the study. This is set out in Chapter 2 of Appendix 1. A briefing note summarising these findings was shared with Greater Cambridge planning policy team on 26 November 2021.

In short, the review indicates that the requirements identified in the 2020 ELEDES for storage and distribution floorspace are at least 50% to 115% lower than the level of need within Greater Cambridge when considering the latest data, and applying a more consistent approach in estimating employment needs. It should be noted that these reflect net requirements, without considering any allowances for flexibility or losses replacement. Most importantly, these requirements relate to local, indigenous requirements for small businesses operating in storage and distribution-based sectors across the area and does not reflect the

strategic requirements that are identified across the appropriate market area as set out in the PPG Paragraphs 26 and 31 and NPPF Paragraph 83.

In our view, the need for storage and distribution has been effectively overlooked by the emerging Local Plan, counter to the NPPF's requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales, and the PPG's guidance in '[How can local authorities assess need and allocate space for logistics?](#)' (Paragraph 31). On this basis, we have identified the lack of the evidential basis to robustly justify the emerging Policy J/NE stating that large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge, which clearly undermines the soundness of the Plan as currently proposed.

We recommend that Greater Cambridge must therefore now seek to properly assess and have regard to the requirements for storage and distribution operations of all scales and in suitably accessible locations in line with NPPF, taking account of the relevant FEMA and PMA, and to provide for such facilities. This requires a full assessment of strategic distribution needs, and an appraisal of all the available supply options to accommodate those needs, once identified. This is critical in order for the emerging Local Plan to be compliant with NPPF (Paragraphs 32 and 83) and PPG on Economic Need (Paragraph 31).

In the current absence of available evidence being prepared for the Councils, Lichfields has reviewed the existing evidence base and undertaken analysis of strategic distribution needs. This analysis was supported by detail market evidence from two of the most active commercial agents across the market, namely Savills and Bidwells (these market reports comprise part of Appendix 1). Both the market reports support that there is high demand for more additional employment space to serve Greater Cambridge and the wider market.

Our analysis as presented in Appendix 1 indicates that the appropriate scale of storage and distribution requirements arising in Greater Cambridge as part of the requirement identified across the relevant strategic logistics Property Market Area (PMA), which extends beyond the identified Functional Economic Market Area (FEMA) to parts of Northamptonshire, Bedfordshire, Hertfordshire, Essex and Suffolk, is estimated to be between 69.0 ha and 85.5 ha. This range reflects patterns of Greater Cambridge's economic activity and employment representation across the market. This need is at least 500% to 630% above the proposed B8 requirements estimated by the 2020 ELEDES.

Lichfields scrutinised the identified supply across Greater Cambridge, and concluded that there is evidently only one site of 14ha developable area that can be genuinely regarded as suitable and available to accommodate strategic distribution uses. This represents just 2.8% of the requirement identified across the PMA, 8.7% of the FEMA's equivalent and 16%-20% of the need identified in Greater Cambridge itself. Synthesising the analysis, there is a shortfall of storage and distribution employment land in Greater Cambridge between 55.0 ha and 71.5 ha across the Plan period to 2041.

Some of this shortfall must be accommodated within Greater Cambridge rather than those areas that have historically been relied upon to accommodate logistics need across the PMA (such as Peterborough and Northamptonshire) to avoid compromising the functioning of Greater Cambridge's economy and to avoid a sub-optimal distribution network resulting in longer journeys by road and higher vehicle emissions.

Synthesising the above, the emerging Local Plan needs to consider updated evidence and to subsequently increase the employment supply across Greater Cambridge by allocating additional land of between 55.0 ha and 71.5 ha which is suitable, available and deliverable across the Plan period to 2041. This will align with NPPF and enable the soundness of the Local Plan.

## **Policy S/DS: Development strategy**

The emerging Policy S/DS: Development Strategy sets out *the “proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge for the plan period and beyond to 2050”*. It identifies where the homes and jobs set out in Policy S/JH should be provided, in order to meet the vision and aims of the Local Plan.

The proposed development strategy is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.

We agree that it is fundamental that new developments are built in the most sustainable locations, for the environment, the economy and communities. However, there needs to be a recognition that this will mean different locations for different types of development, including greenfield locations for uses best located outside, but close to settlements such as employment hubs which have a servicing function for all other development sectors.

Locating logistics facilities close to urban centres enables the use of electric fleet and cargo bikes for last mile deliveries. In addition, this encourages workforce to travel to work via sustainable and more active transport modes, such as cycling, encouraging healthier lifestyles, decreasing congestion and improving the air quality.

At present, emerging Policy S/DS directs development to brownfield land and where it responds to opportunities created by proposed major new infrastructure. It then goes on to recognise that locations capable of providing sustainable development include the Cambridge urban area, edge of Cambridge, new settlements (namely Cambourne, Northstowe, Waterbeach and Bourn Airfield), the Rural Southern Cluster and limited development in the rest of the rural area.

We welcome that Policy S/DS recognises that appropriate development in the rest of the rural area including, *“new employment sites in the countryside meeting specific business needs”* and that Policy S/RRA identifies two manufacturing and warehousing allocations around the Swavesey junction of the A14. We agree that this quadrant of Greater Cambridge along the A14 is the most appropriate location to bring forward future economic opportunities and allow existing and new businesses to invest in the area. This location is served by the upgraded A14 and as such has high accessibility to the strategic network. In addition, this area is bounded by new residential developments including Northstowe (6,345 new homes across the Plan period), Cambourne West (2,590 homes), Cambourne (1,950 homes), Bourn Airfield (2,460 homes), Darwin Green (478 homes) and Eddington (3,142 homes). On this basis, significant additional labour supply will be available in this area over the plan period. Moreover, this location will encourage sustainable commuting to work and sustainable urban transport modes to deliver services in the City.

Given the clear sustainability benefits of locating such business along the strategic road network with minimal local highways trips and the recent major infrastructure improvements to the A14, we would encourage Policy S/DS to explicitly recognise that J25 Bar Hill, which is located outside of the Green Belt provides a valuable, sustainable, suitable and appropriate location for development, and support further development in this location.

## **Policy S/RRA: Site allocations in the rest of the rural area**

The proposed Policy S/RRA: Site allocations in the rest of the rural area “allocates sites for homes or employment that support the overall development strategy within the rural area, excluding the rural southern cluster”.

The supporting text adds that:

*“For employment, we considered the evidence from our Greater Cambridge Employment Land Review & Economic Development Evidence Base (2020) to understand the locational demand of different sectors. We then reviewed site opportunities to identify the preferred list of sites. The site selection was informed by the Housing & Employment Land Availability Assessment, and taking into account sustainable travel opportunities alongside the likely travel requirements of the proposed uses. We identified land that could respond to the need for local warehousing and distribution with good access to the highway network. We also identified some small-scale opportunities in accessible locations which could add the mix and types of land available.”*

The J25 Bar Hill site is not allocated for development. Instead, the GCLP makes two allocations within the rest of the rural area that include an element of light industrial, warehousing and/or distribution uses (Use Classes B2 and B8). This list does not include Classes E(g)(i) Offices to carry out any operational or administrative functions, E(g) (ii) Research and development of products or processes; and E(g) (iii) Light Industrial processes. It also does not include allocations for replacement of existing floorspace (e.g. S/RRA/OHD Old Highways Depot, Twenty Pence Lane, Cottenham).

- **S/RRA/SAS Land to the south of the A14 Services:** 18.2ha suitable for Class B2 (General Industrial) and Class B8 (Storage or Distribution) providing a range of small and medium sized units.
- **S/RRA/CR Land at Buckingham Business Park, Swavesey:** 2.1ha for Class B2 (General Industrial) or Class B8 (Storage or Distribution). B8 use would be limited to small to medium sized premises.

Based on the above, the GCLP would be providing up to 20.3ha (based on our assessment in Appendix 1, the developable area is much less) of Class B2/B8 floorspace within the Rest of the Rural Area. There are no further allocations for Class B2/B8 floorspace in the emerging GCLP<sup>1</sup>.

Moreover, and as detailed in our response to Policy S/JH (New jobs and homes), the ELEDES’s storage and distribution uses floorspace need projections are a significant underestimate. Instead, we have identified a requirement for allocating additional land of 69.0 ha to 85.5 ha for storage and distribution uses which is suitable, available and deliverable across the Plan period to 2041. Considering the developable supply position in Greater Cambridge, this results in a shortfall of strategic logistics land of 55.0 ha to 71.5 ha.

J25 Bar Hill has capacity to deliver around 60 ha of developable floorspace<sup>2</sup> and as evidenced by Appendices 3 and 4 of this Representation, is suitable, available and achievable, contrary to the conclusions of the

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<sup>1</sup> We have excluded allocation ref. S/C/SCL Land South of Coldham’s Lane, Cambridge. This is a 9ha site suitable for commercial development (such as relocation of ‘space intensive’ uses such as builders’ merchants sales and storage facilities which are currently located elsewhere in the city).

<sup>2</sup> See Proposed Masterplan Plots with 10% BNG Landowner’s Retained Land drawing (ref. 4585/CA/00/00/DR/A/0085 Rev P3).



Greater Cambridge's HELAA Site Assessment ref.40248 (Appendix 2). The site's assessment is summarised at Table 2 overleaf.

Table 1 J25 Bar Hill Assessment Summary

Topic	HELAA RAG	Updated RAG	Commentary
<b>Adopted Development Plan Policies</b>	Yellow	Yellow	Site located c.400m from the settlement of Bar Hill, on the north side of the new Junction 25 of the A14. Situated outside the SCLP (2018) Development Framework (Policy S/7) and the Green Belt (Policy S/4). Policy E/11 states that large scale warehousing and distribution centres will not be permitted in South Cambridgeshire.
<b>Flood Risk</b>	Yellow	Green	Site-specific hydraulic modelling demonstrates that the area of the site within FZ3 is 0.44% and FZ2 is 2.72%. These areas of the site are located adjacent to Oakington Brook which would not be built on.
<b>Landscape and Townscape</b>	Red	Green	Site should have been assessed as 'Green' in Landscape and Townscape terms i.e. <i>'Development of the site would have a detrimental impact which could be satisfactorily mitigated.'</i> Whilst potential future development is likely to result in some adverse effects in these terms, it is clear from a site-based appraisal that these effects can be mitigated and minimised. It is also clear that existing landscape features within the site can be conserved and extended as the basis for a robust landscape framework and setting to future development.
<b>Biodiversity and Geodiversity</b>	Yellow	Yellow	No statutory or non-statutory sites of nature conservation importance within 5km of the site. There are a number of protected/notable species records that fall within the site, to be assessed with application (none listed as a Priority Habitat). Proposal would be capable of achieving a c.12-20% biodiversity net gain on site.
<b>Open Space/ Green Infrastructure</b>	Green	Green	No Technical Report has been prepared as the GC Assessment score was Green.
<b>Historic Environment</b>	Yellow	Green	There are no designated or non-designated heritage assets within the site. A Grade II milestone is located within 1km, to the southwest. Within a wider buffer zone of 1km to 2km, there are 33 further designated assets. Any potential impact on the wider setting of these heritage assets can be mitigated by landscaping and design measures.
<b>Archaeology</b>	Yellow	Yellow	There are a number of known non-designated heritage assets within the site: Important Mesolithic and Roman period remains – located in the eastern third of the site. There is potential for further unknown remains elsewhere within the site. None of the identified assets would preclude allocation of the site for major development or would prevent its future development.
<b>Accessibility to Services And Facilities</b>	Yellow	Yellow	The assessment criteria is not necessarily suited to employment sites. The relevance of achieving a Green score by virtue of being close to schools is clearly debatable. The site should be scored higher in the context of proximity to cycle and public transport networks. The assessment is incorrect in this regard. With proper consideration of criteria that are relevant to employment sites, such as proximity to cycle and public transport routes and location in the context of existing and new communities (including Northstowe (6,345 new homes across the Plan period), Cambourne West (2,590 homes), Cambourne (1,950 homes), Bourn Airfield (2,460 homes), Darwin Green (478 homes) and Eddington (3,142 homes)), the site would achieve a higher score.
<b>Site Access</b>	Yellow	Yellow	Vectos agree with the assertion that access is suitable in principle and that some refinement of the proposals will be required through the detailed design process. Without a clear understanding of how sites might achieve a Green

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	Yellow	Yellow	score, they consider the Amber score to be appropriate. Wider comments associated with National Highways and the Strategic Road Network should be removed where they are not relevant to the nature of the immediate site access.
<b>Transport and Roads</b>	Red	Yellow	The HELAA references a Transport Assessment for the site which has not been made visible as part of the evidence base. The assessment criteria identify how sites might be scored Red. For many of these criteria the HELAA concludes elsewhere that the site is suitable. Based on other criteria there is no evidence to suggest a negative outcome. With reference to another employment site, clear inconsistencies of scoring are apparent. The proximity of the site to emerging communities such as Northstowe, which is a positive in a sustainable transport sense, combined with the conclusions elsewhere that capacity on the newly improved local highway network is available, suggests that the site should receive at least an Amber score. There are no identifiable reasons for scoring the site Red.
<b>Noise, Vibration, Odour and Light Pollution</b>	Yellow	Green	A baseline noise survey has been undertaken by Sharps Redmore. Existing noise levels are characterised by road traffic on the A14 and local road network. At night activity on the local roads reduce and noise from the A14 dominates. In terms of operational noise, the key impacts from industry and warehousing uses would be noise from fixed mechanical plant serving the units, service yard activity and noise break-out from units. Operational vibration is not considered, as this will have no impact. Sharps Redmore therefore conclude that the assessment score should be Green.
<b>Air Quality</b>	Yellow	Green	Site is partially within AQMA, however, SCDC's monitoring data shows pollutant concentrations have been below relevant AQO's (less than 40µg/m <sup>3</sup> of NO <sub>2</sub> and PM <sub>10</sub> ) since 2014 and the AQMA is intended to be revoked. Further observations by DEFRA shows pollutant concentrations well below AQOS (9.7-11.4µg/m <sup>3</sup> NO <sub>2</sub> and 17.1-18.3µg/m <sup>3</sup> of PM <sub>10</sub> ).
<b>Contamination and Ground Stability</b>	Yellow	Green	Series of investigations of the site have already been carried out which conclusively show no presence of contamination and suitable ground stability.
<b>Strategic Highways Network</b>	Yellow	Yellow	It is unclear what models or data was used in order to determine the relative capacity of the SRN across the area. The Zone within which the site is located suggests some, albeit limited capacity for growth. Whilst the conclusion is somewhat surprising given the recent improvements to the A14 in this area and Junction 25, this allows a later assessment to confirm the suitability of the site and proposals, and therefore the site is considered suitable.

Source: MJM Consulting Engineers, FPCR, RPS, Vectos, Sharps Redmore, Redmore Environmental and Lichfields

As evidenced above, the site is suitable, available and achievable and would help to meet Greater Cambridge's employment need over the plan period to 2041, in accordance with the requirements of the NPPF.

The allocation of J25 Bar Hill for a sustainable leading-edge employment park development with business and logistics capability and capacity of around 60ha to meet the identified shortfall of employment land across the Plan period would fully align with emerging Policy S/DS and NPPF Paragraphs 11 and 83. Further and as recognised on pg. 36 of the supporting text of the GCLP "providing a healthy supply of land for