Tritax Park Queens' Cambridge
Tritax Big Box Developments
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BIDWELLS

TRITAX PARK QUEENS' CAMBRIDGE
REGULATION 19: GREATER CAMBRIDGE LOCAL PLAN REPRESENTATIONS

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1.0 Introduction

1.1 Introduction

1.1.1 This representation has been prepared on behalf of Tritax Big Box Developments (hereafter referred to as "TBBD") in response to the Greater Cambridge Local Plan 2024-2045 – Regulation 19 Publication Version consultation.

1.1.2 The Greater Cambridgeshire Local Plan (hereafter referred to as "GCLP") is being prepared under the legacy system and will be examined in the context of the National Planning Policy Framework (hereafter referred to as "NPPF") of December 2024 and its associated Planning Practice Guidance (hereafter referred to as "PPG"). Therefore, all references to the NPPF are plan making references to those of December 2024 unless otherwise stated in respect of implications on decision making policies and implications against the August 2026 version of the NPPF.

1.1.3 This representation considers the wider spatial strategy proposed by the Council, specifically in relation to employment and commercial development, whilst also focusing on TBBD interests on Land at Junction 25 of A14, Bar Hill (HELAA References: 40121 and 40244), known as Tritax Park Queens' Cambridge.

1.1.4 Alongside this representation, the following drawing and technical responses have been prepared and can be found as Appendices:

- Appendix 1 – Bidwells B2/B8 Need in Greater Cambridge (Regulation 18 evidence).

1.1.5 Bidwells has a long history of promoting development proposal sites through Local Plans across Greater Cambridge. We have several concerns relating to the soundness of the proposed Plan, particularly the draft development strategy and its failure to plan positively for long-term economic growth, recognising both the importance of Greater Cambridge to the national economy and the extent of opportunity for sustainable growth that is being missed.

1.1.6 Importantly, we feel the pre-submission version does not plan for sufficient commercial floor space over the Plan period, specifically to meet the market demand for freight, logistics and advanced manufacturing. We are also concerned by the Council's reliance on only two proposed allocations to meet this need which does not show any sort of flexibility to aid deliverability.

1.1.7 Whilst the plan is to be examined under the 2024 NPPF, we feel strongly that a plan for an area of such grand economic importance cannot ignore the objectives of the 2026 NPPF. Specifically Plan Making Policy E1 'Providing the conditions for long-term economic growth' and Chapter 7 Building a strong, effective economy.

1.1.8 **Policy E1 is very clear where it requires development plans** to "*Set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas, having regard to the Industrial Strategy and any relevant strategic and local strategies for economic development and regeneration. In doing so plans should take into account both local business needs and wider needs and opportunities for economic growth and investment including relevant market signals,* ***priority places for investment*** *in key sectors set out in the Industrial Strategy, and the location of Industrial Strategy Zones and AI Growth Zones* (**Our own emphasis**)."

2.0 Representations – Development Strategy

2.1 Policy S/JH: New Jobs and Homes

2.1.1 TBBD objected to Policy S/JH in their Regulation 18 representations on the basis that the Local Plan does not plan for sufficient employment land to support the significant economic potential that exists in the Greater Cambridgeshire area.

Economic Growth as an Imperative

2.1.2 Greater Cambridge has been recognised by successive governments as one of the UK's most important economic growth opportunities, particularly as a global leader in life sciences, technology and research sectors.

2.1.3 Furthermore, Greater Cambridge forms part of the Oxford Cambridge Arc (referred to as the UK's Silicon Valley in March 2026 by the Oxford-Cambridge corridor to be UK's "Silicon Valley" - GOV.UK) which has long been recognised as one of the central planks of the Government's plans for economic growth.

2.1.4 Matthew Pennycook MP, Minister of State for Housing and Planning, identified that sustained economic growth is the only route to improving the prosperity of the country and living standards of working people. Identifying economic growth as the government's number one mission.

2.1.5 His statement on realising the full potential of Greater Cambridge identifies that whilst the economic growth of Cambridge has been a phenomenal success, it has even greater potential beyond to contribute to an even greater extent to the national economy.

2.1.6 In this context, the government established the Cambridge Growth Company in 2024 to address barriers to growth and help unlock Greater Cambridge's full potential. More recently, the government established the Greater Cambridge Development Corporation in June 2026 with the express purposes of building upon the work of the Growth Company to achieve transformational economic growth. The Ministerial Statement states clearly *"Greater Cambridge Development Corporation", to promote ambitious, high quality, sustainable growth and unlock the full potential of Greater Cambridge, for the benefit of its communities and the country as a whole". (*Written statements - Written questions, answers and statements - UK Parliament).

2.1.7 The Cambridgeshire and Peterborough Combined Authority (hereafter referred to as "CPCA") adopted its Local Growth Plan in 2025 with an ambition to ensure the local economy grows faster than any other region in the UK. This includes setting a mayoral target across the CPCA area of tripling the economy by 2050.

2.1.8 In the Chancelors Growth Speech of September this year outlined a strategy to transform the country into a "Growth Britain" ahead of the October Autumn Budget with an approach for fiscal discipline and to drive growth in every postcode.

Employment Growth

2.1.9 The Local Plan has been prepared on the basis that it supports the delivery of 73,200 new jobs – this figure is presented by the Council as a ceiling rather than a target. In parallel, the amount of land allocated to support delivery of this job growth (discussed further in response to Policy S/DS) includes enough land to deliver only 317,000m² of industrial and warehousing floorspace. TBBD consider that both figures are far too low and lack vision given the significant economic potential of

the area and specifically the extensive and previously suppressed need for industrial and warehousing floorspace in the Greater Cambridgeshire area.

2.1.10 The Local Plan does however recognise the national importance of the Cambridge economy, stating at Paragraph 2.8 that '*The continuing strength of the nationally important Greater Cambridge economy provides justification for exploring higher employment and related housing figure'.*

2.1.11 Despite this, the Local Plan targets only 73,200 jobs based on a 'central' forecast, which includes an assumption that there will be downturns and unknown shocks in the economy. This effectively embeds excessive caution into the target leading to an unjustified limit on the economic growth potential of the area rather than seeking to present any sort of positive ambition in line with Paragraph 2.8. This is confirmed in the conclusion set out in the Employment and Housing Needs Evidence Update (EHNU) (2025), Paragraph 3.60). As such, TBBD do not consider that Policy S/JH has been positively prepared.

2.1.12 The updated EHNU (2025) reiterates that a 'higher' rate forecast was considered which aligned with the faster 10-year growth rate for the first 5 years of the plan period, before return to a balanced 20-year growth rate. However, the analysis appears to suggest that a more optimistic forward looking forecast is not justified due to recent under performance against previous forecasts, despite recognising that this covers the period of the Covid-19 pandemic and the post-Covid recovery period, and that the alternative Centre for Business Research (CBR) data indicating a more positive economic outlook which would '*lean towards a conclusion of planning for a high level of employment growth'* (Development Strategy Topic Paper, Paragraph 3.2).

2.1.13 Table 3.7 of the EHNU (2025) is clear that the preferred strategy of delivering 73,200 jobs during the plan period represents a compound annual growth rate (CAGR) of 1.34% over the plan period, significantly below the 2010-2020 comparison (2.07%), indicating the lack of ambition in the forecast. Additionally, as is recognised in the Topic Paper (Paragraph 3.25) CBR's analysis indicates recent growth rates of 6.7% in 2021/22, 6.3% on 2022/23 and 5.3% in 2023/24. It is, therefore, clear that the level of job growth that is planned for in the development strategy is significantly below that which could be delivered in the area. This is important, as it has a direct impact on both the level of housing and employment land allocated in the Local Plan.

2.1.14 Building on the analysis above, it is noted that the Development Strategy Topic Paper makes numerous references to 73,200 being the 'most likely' forecast of job creation over the plan period and an effective ceiling, dismissing the need for a more optimistic target or any positive flexibility. In an area which is 'championed' as one of the leading economies in the country, TBBD do not consider that this approach to be justified, nor does it align with national policy, which seeks to support investment and economic growth as is reflected by the Government's continued recognition of the Oxford-Cambridge Growth corridor. Further, this approach does not align with our evidence regarding quantum of need supplied at Regulation 18 stage and would therefore be contrary to the objectives of the 2026 NPPF (Building a strong, effective economy) and the Governments ambitions for growth, as such a strategy would likely result in under provision and actively restrict economic growth and job creation.

2.1.15 Although not referred to specifically in Policy S/JH, the supporting text notes the need for just 317,000m² of industrial and warehousing floorspace. The allocations to meet this requirement are discussed further in our representation on Policy S/DS. However, in relation to Policy S/JH, TBBD would note that this is a significant underestimation of the requirements of the area and as outlined above, an increased figure would not result in any 'harm' but would simply provide the flexibility

and contingency to enable sustainable growth unincumbered by unnecessary pr ambiguous planning restrictions.

2.1.16 **As such the level of job growth proposed should align with the high growth scenario, which would be reflective of a more optimistic market approach based on the economic prominence of Greater Cambridge – 90,900 jobs.**

Logistic, Warehouse and Mid-Tech Space

2.1.17 Our Regulation 18 representation (Appendix 1) identified a need for a minimum of 429,900m² of net additional B2/B8 floorspace based on an approach of utilising forecast growth in GVA by job type and converting this into the necessary increase in floorspace, which includes forecasting and is an accepted approach. This is significantly above – 36% - the 317,000m² of additional floorspace identified in the Local Plan. This evidence remains robust and valid and should be fully considered by the Inspector.

2.1.18 Notwithstanding the above, the EHNU notes that a 5% availability rate corresponds with the recommended 317,000m² requirement, whereas an 8% rate would increase this to around 360,000m². We question therefore, why this lower end of the range has been replied upon. Within the Councils own (Iceni report) evidence they state, "*It is widely recognised that 5-10% (with a 7.5% mid-point) availability or vacancy is needed in commercial markets for functionality and enabling business to grow into new space or facilitate inward investment".*

2.1.19 Whilst there are methodological differences that account for the different forecast of the floorspace required over the plan period, we consider that the previous market suppression in Greater Cambridgeshire, as well as a need to factor in regional/national need into the figure are key issues, which are being underplayed in the Councils evidence base.

2.1.20 The later point is specifically addressed in the supporting Iceni report, 'Review of economic data, context and representations (June 2026)', where it states that '*whilst wider area large scale warehouse requirements are acknowledged, it is not clear that they are Plan area specific, with historic patterns focussing delivery in other parts of the Cambridgeshire and Peterborough area such as Peterborough and Huntingdonshire'.* However, there does not appear to be any specific evidence that would support this position, either in respect to wider sub-regional requirements or any analysis on the needs arising from neighbouring authorities and the position taken within their emerging Local Plans.

2.1.21 As we pointed out at Regulation 18 stage, this is a naïve position to take as there will be significant overlap between the needs of local occupiers versus others and indeed, even once allocated, planning policy has no direct control over who occupies units. As is touched on further in our representations on Policy J/NE, the approach of the Local Plan appears to be to specifically constrain the number of large floorplates units, which generally have greater building heights, by manipulating and constraining the objectively assessed need for floorspace in a way which is contrary to national planning policy and guidance. Our view is that constraining the supply in this way will only result in the continued chronic undersupply of industrial and warehousing floorspace which has impacted economic growth in the past, particularly if national and regional occupiers are able to out-bid smaller local occupiers for the same floorspace. Therefore, it is illogical for the need for such floorspace to be excluded from the assessment of need, particularly given the Governments ongoing support for economic growth in Greater Cambridgeshire.

2.1.22 As such, **the supporting text (Paragraph 2.12) should be modified to increase the need for industrial and warehousing floorspace over the plan period from 317,000m² to at least 429,900m² to properly reflect the full assessed need.**

Sustainability Appraisal

2.1.23 It is also noted that the Sustainability Appraisal process does not appear to have assessed a higher, employment led growth scenario after 2021 (SA report Paragraph 2.20). The report states that '*Planning for the higher jobs forecast and level of homes associated with it (maximum growth option) was rejected as while this higher job forecast could be possible, it is not the most likely future scenario. As such the Councils did not consider that it represents Greater Cambridge's objectively assessed need and would therefore not be a reasonable alternative'.*

2.1.24 In light of the Chancellors direction for growth and given the level of evidence that indicates that higher levels of job growth could be possible and in recognition that the Cambridge economy is of national importance, we do not consider that it would have been unreasonable to test such a growth scenario as a reasonable alternative and the failure to do this is a weakness of the Sustainability Appraisal process. Failure to plan for such a scenario would likely lead to little prospect in delivering on the governments growth agenda and would miss a fundamental opportunity to provide the necessary conditions for long-term economic growth, contrary to Chapter 7 of the 2026 NPPF. **As such, the strategy is not justified as it has not properly tested the alternative scenarios for higher rates of growth to understand the sustainability implications.**

2.1.25 To make the Plan sound, the following changes are considered necessary:

- Undertake a proper assessment of the sustainability effects of higher rate of employment growth to ensure the strategy is justified.
- Increase in the level of job growth proposed to align with the high growth scenario, which would be reflective of a more optimistic market approach based on the economic prominence of Greater Cambridge – 90,900 jobs.
- At Paragraph 2.12, increase in the need for industrial and warehousing floorspace over the plan period from 317,000m² to at least 429,900m².

2.2 Policy S/DS: Development Strategy

2.2.1 Policy S/DS sets out the order of preference for where the need for new jobs and homes will be met. In overall terms, this logically focuses on the urban area of Cambridge, before moving to locations beyond the city boundary, including within the urban area.

2.2.2 However, in our view, the strategy fails to adequately separate the strategy for delivering homes and jobs which, whilst interlinked, have different locational characteristics which justify greater clarity in the policy.

2.2.3 As an example, the delivery of industrial and warehousing is primarily focused on two sites in the A14 corridor. However, the strategy identifies the sites under the 'in the rest of the Rural Area' sub-heading. This suggests rural scale growth when in reality, the 'strategy', which TBBD support and is in accordance with the 2024 NPPF Paragraph 86 c), is to focus strategic scale warehouse and distribution floorspace in the key A14 corridor. The policy would benefit from this point being made clear which would add to the justification for the overall strategy and ensure its effectiveness, when the plan is read as a whole. This is further emphasised in plan-making Policy E1,1c,ii) of the 2026 NPPF with a clearer focus on freight and logistics.

2.2.4 As set out in our representations on Policy S/JH, TBBD consider that requirements for additional employment land, specifically industrial and warehousing land, are significantly below identified need, and should be increased by at least a third. TBBD, therefore, reasonably conclude that more land needs to be identified in the Local Plan to ensure that the true level of demand for such

floorspace can be met over the plan period. TBBD consider that the inclusion of their site at Tritax Park Queens' Cambridge would be a logical addition to the Local Plan, lying within the A14 corridor which has rightly been identified as the key location for such uses specifically to serve the Greater Cambridgeshire area. This is evidenced by DPD already being a named occupier for the proposed Tritax Park Queens' Cambridge development.

2.2.5 The A14 represents a priority national route for the strategic movement of freight and logistics linking the port of Felixstowe to the national motorway network. This route and its connections allow logistics and freight to integrate with rail freight and supply chains enabling the efficient movement across the UK (Accounting for 5.3% of all freight moved through UK ports in 2023- Appeal Reference: APP/M2840/W/25/3362393).

2.2.6 The A14 consequently plays a critical role in enabling the efficient distribution of goods entering and exiting the UK, connecting them to key distribution centres, manufacturing hubs and retail destinations, such as Cambridge City. As such, it is of national importance and ready access to it directly contributes to growth-supporting infrastructure and the networks that support freight and logistics that the Government has identified as a particular priority.

2.2.7 In respect to localised demand within the Greater Cambridgeshire area, the diversity and type of occupier who have a registered requirements in the market since Covid, remains unsatisfied due to the historic suppression of this type of development under current adopted planning policy. This active local demand is drawn to an area of unmet provision to establish themselves within close proximity to the city of Cambridge to support the continued growth of Greater Cambridge, such as the life sciences and technology clusters.

2.2.8 Even if the Inspector(s) were to conclude that the Council's approach to calculating the need for industrial and warehousing land is justified, TBBD still consider that additional land needs to be identified in the Local Plan to ensure the Plan can be effective in meeting the requirement.

2.2.9 As drafted, the Local Plan effectively allocates only one site (Slate Hall Farm) that is suitable to meet the needs of strategic scale industrial and warehousing floorspace over the plan period, noting the scale and nature of the A14 services allocation means it is more suited to smaller units. There is no contingency in supply should the site (Slate Hall Farm) not come forward as expected, nor is there any flexibility to respond to changes in the market.

2.2.10 The approach to industrial and warehouse land in the Development Strategy is therefore ineffective, as well as being contrary to national policy, with the 2024 NPPF (Paragraph 86e) requiring policies to be flexible enough to meet needs not expected in the plan period and to allow rapid response to changes in economic circumstances. Allocating only sufficient land (320,000 m² across three sites) to meet what the Council considers to be the minimum need for such floorspace cannot be considered to meet this requirement, or to be indicative of a positively prepared plan (Emphasised in plan making Policy E1,1cii) of the 2026 NPPF).

2.2.11 The inclusion of an additional criterion in Policy J/NE that would allow some additional warehousing and distribution facilities outside settlement boundaries adds an element of flexibility to the overall strategy and is welcomed (although we have made specific comments on the detail of the policy). Policy J/NE better aligns with the intention of the development management policies of the new NPPF, which will be in operation alongside the policies of the new Local Plan, if adopted, and should be mentioned in Policy S/DS to set out how the two policies are expected to operate alongside each other. However, such a policy should not be at the expense of planning positively to meet the underlying needs of the area, which should be properly accounted for within the development strategy and should therefore only be effective in additionality to the increased need that should be met by way of the allocation of additional land.

2.2.12 In relation to the deliverability of the sites identified in Policy S/DS, we would note that there are numerous policy requirements of the Local Plan which could have an impact. The introduction of CIL cannot be ignored, as in parallel this adds a significant risk to stalling development viability and delaying growth in this sector, if not introduced in an appropriate and evidenced based manner. Such requirements, risk stalling development viability and delaying growth, specifically, in relation to the delivery of sites, as is noted in relation to other policies, there is a significant burden on major developments which could have an impact on viability and meeting the site-specific expectations set out in the Local Plan. Policy requirements, introducing CC/NZ (Net Zero operational requirements beyond national policy), CC/WE (Water leak detection beyond national policy), BG/TC (with no loss of canopy cover), WS/NC (with the requirement to assess sports, recreation, culture and community needs, and include strategies that address identified needs) and J/AW (with the requirement to include affordable workspace), plus the introduction of CIL, will all place a burden on development that could impact viability, making it vital that flexibility is built into the supply of land.

2.2.13 To make the Plan sound, the following changes are considered necessary:

- Update the policy to make clear the strategy for the delivery of industrial and warehouse facilities, specifically the role of the A14 corridor, as a strategic freight corridor of national and regional importance.
- Allocate additional land in the A14 corridor to meet the significant additional demand for industrial and warehousing floorspace identified in representations on Policy S/JH.
- Link to Policy J/NE to provide clarity as to how they will be expected to operate as part of the same development strategy.

2.3 Policy S/SH: Settlement Hierarchy

2.3.1 Policy S/SH sets out the settlement hierarchy and the expectations for the nature of development that will be accommodated in each location/area. However, it is not clear what role the settlement hierarchy plays in consideration of employment-led development.

2.3.2 As noted in relation of Policy S/DS, major employment growth is proposed in the ‘rural area’. However, this is not reflected in the settlement hierarchy, which appears to focus solely on residential development, and omits any reference to employment related growth. This could be somewhat misleading for the reader and needs further justification/explanation within the policy.

2.3.3 It is suggested that clarity needs to be provided in the policy wording, or the supporting text, to make clear the role and purpose of the policy. If the settlement hierarchy is not to be updated to refer to employment locations, including the A14 corridor, the settlement hierarchy needs to set out which policies are relevant to the consideration of employment related developments.

2.3.4 Given the importance of Greater Cambridge to the national economic growth agenda, this Local Plan has to co-exist with the national objectives and conditions to enable long-term economic growth in accordance with Chapter 7 of the 2026 NPPF. As such, consideration needs to be given as to how the policy will operate alongside the new 2026 NPPF, which set out a number of opportunities for development to be justified outside defined settlement boundaries. Again, this could be a matter that is addressed through an update to the supporting text.

2.3.5 To make the Plan sound, the following changes are considered necessary:

- Either update the policy to reflect the location of development or update the supporting text to provide clarity on the relationship with employment land policies.

2.4 Policy S/DE: Defined Development Extents

2.4.1 Linked to our comments on the settlement hierarchy, although not a direct consideration for the examination of the Local Pan, there is a need to consider how the policy will operate alongside the new NPPF which includes policies, including those that allow for development outside defined development extents.

2.4.2 In relation to freight and logistics development, any application will be considered against Policies S5 (J) (i) and E3 of the 2026 NPPF which allow development outside settlement boundaries. The wording of Policy S/DE is contrary to these policies and should be given limited weight in decision making in accordance with the new NPPF Annex A2. We therefore suggest that the Council consider how this conflict is addressed in the Local Plan. This is of significant importance given the role Greater Cambridge is to play in the national economic growth agenda, the Local Plan has to therefore co-exist with the national objectives and conditions to enable long-term economic growth in accordance with Chapter 7 of the 2026 NPPF.

2.4.3 In relation to soundness, TBBD note that Paragraph 86 e) of the 2024 NPPF sets out that policies should be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

2.4.4 Whilst Policy J/NE provides an element of flexibility to meet unexpected needs outside defined settlement extents, this policy is not explicitly linked to Policy S/DE. Whilst there is reference at bullet 2d) to development that is supported by other polices in the plan, it is not clear that this refers to employment floorspace. In the same way as rural exception sites and development for other specific uses in referred to in bullets 2 a-d), we consider that the effectiveness of the plan would benefit from reference to when employment floorspace will be allowed outside defined boundaries – and this would logically be by providing a link to Policy J/NE, which we have commented on separately.

2.4.5 Such a change would provide clarity to the reader and be justified by the requirements of Paragraph 86 e) of the 2024 NPPF.

2.4.6 To make the Plan sound, the following changes are considered necessary:

- Update the policy wording to link to Policy J/NE to make it clear that the need for employment floorspace can be the tigger for justifying development outside defined extents of development.

2.5 Policy S/MO: Monitoring

2.5.1 TBBD welcome the commitment of Policy S/MO to monitor the implementation of the performance of the Local Plan against the monitoring framework, which includes indicators around job creation and the delivery of new employment floorspace. However, there are issues with the policy as drafted, along with the monitoring framework, set out at Appendix E of the Local Plan, which mean the policy is likely to be ineffective.

2.5.2 The wording of Policy S/MO refers to mechanisms being triggered to ‘review’ allocations, taking ‘action’ to bring forward sites, without any detail as to how this would work in practice, rendering the policy ineffective. We suggest it would be more effective if more specific mechanisms were identified which make it clear what the implication will be if monitoring shows that the Local Plan is not delivering as expected. It is suggested that this could include identifying where there could be policy flexibility and/or setting out timescales within which action will be taken.

2.5.3 Additionally, the monitoring framework at Appendix E lacks sufficient detail to understand when the interventions proposed in Policy S/MO would be triggered. For example, in relation to Policy S/JH (Monitoring Indicator Code M1A), the only trigger is the inability to meet the 73,000 new jobs by the end of the plan period. There are no annualised indicators or intervening targets which would suggest that ongoing monitoring would lead to the need for any intervention.

2.5.4 Equally, for Monitoring Indicator M1B (related to the amount of new employment floorspace created), there is no target set and no trigger for any intervention. It is, therefore, unclear how any underperformance will be identified and when the need for any action to be taken by the Council to address the failings of the Local Plan.

2.5.5 As set out in our representations on the Spatial Strategy, the importance of the monitoring framework would not be as great if the Council had proposed the allocation of additional land to ensure flexibility and contingency in the supply of employment land. However, as drafted, TBBD consider that it is imperative that the monitoring framework is robust to manage the significant risk that the employment market and economic growth potential of the area will be restricted by the under delivery on new employment floorspace.

2.5.6 We therefore suggest that both Policy S/MO and the Monitoring Framework on which it relies, need to be updated to ensure they are effective in supporting the delivery of the Local Plan objectives.

2.5.7 To make the Plan sound, the following changes are considered necessary:

- Update Policy S/MO to include additional detail as to the actions that will be undertaken to bring forward sites in circumstances where the monitoring identifies a lack of progress.
- Update the monitoring framework to allow regular and timely progress against job creation and employment floorspace completion to be monitored, including the addition of specific trigger points for intervention measures to be actioned.

3.0 Representations – Site Allocations

3.1 Site Allocations: Rest of Rural Area

3.1.1 Chapter 3 of the Local Plan sets out policies for specific site allocations which have been identified to deliver the overall spatial strategy for the area.

3.1.2 TBBD support a number of the conclusions drawn when identifying sites for allocations, as set out in the appendices to the Development Strategy Topic Paper. In relation to sites for industrial and warehousing space, key areas of support include:

- The identification of generally preferred locations for different employment typologies, including the A14 corridor for industrial and warehousing space.
- The conclusion that there is no need to look inside the Green Belt given the availability of suitable sites outside the Green Belt capable of meeting the needs of the area.
- The approach of narrowing sites down from the initial long list based on the suitability (including scale) to meet identified needs and on the basis of not wanting to affect the delivery of new Settlements (specifically Cambourne).

3.1.3 However, we have a number of issues with the conclusions set out in the justification to the selection of sites set out in the Development Strategy Topic Paper (Appendix 7: Review of sites for industrial and warehousing space) and do not believe the selection of sites has been properly justified. The specific concerns relate to the assessment of Land North of A14, J25, Bar Hill (Tritax Park Queens' Cambridge) (HELAA References 40121 and 40244).

3.1.4 A key determining factor for the Council discounting the Site appears to be that the Site is considered to be a 'dry island' with the conclusion that all points of access would require crossing Flood Zones 2 and 3 (Topic Paper Appendix 7, Paragraph 1.11). This conclusion is inaccurate. Whilst the proposed scheme does include an access from the B1050 which does cross Flood Zones 2 and 3, this has been proposed due to this being the optimum access point in highway safety terms. Access could have been taken from the south from the A1307, the same road from which access will be taken for the proposed allocation at Slate Hall Farm and indeed is used as the proposed emergency access point.

3.1.5 Irrespective of this point, the flood risk identified to the east of the Site is 'in channel' and can easily be bridged without affecting Flood Zone 2 or 3 in any way. The conclusion on flood risk is, therefore, not justified.

3.1.6 The Topic Paper also indicates that the development of Tritax Park Queens' Cambridge (HELAA References 40121 and 40244) will have significant negative impacts on the landscape, with a very simple conclusion that large scale buildings will have significant impact on the landscape. We can see no evidence which justifies this conclusion. The Landscape Sensitivity Study (Page 315) assessed the Tritax Park Queens' Cambridge site in the same study area as Slate Hall Farm, concluding that the area is of medium/low sensitivity to development. Whilst the Slate Hall Farm site includes additional trees and hedgerows which would offer some mitigation to landscape impact if retained, these are not of such significance to logically conclude that they make the site suitable for development whilst considering Tritax Park Queens' Cambridge would have significant impacts.

3.1.7 We also note that the latest HELAA summaries only have landscape comments on Tritax Park Queens' Cambridge from 2021, with other sites, including Slate Hall Farm, having additional

comments for in 2025 and 2026, suggesting an inconsistent, non-evidential, approach has been taken to drawing the conclusions on landscape.

3.1.8 The Topic Paper conclusions appear to use accessibility by active travel routes as justification for proposing Slate Hall Farm for allocation, despite Tritax Park Queens' Cambridge having almost exactly the same accessibility characteristics. Indeed, Tritax Park Queens' Cambridge arguably has more straight forward access arrangements, which would have less impact on the local highway network, but this does not appear to have been considered. This is further contrived by the fact that the land to the south of Cambridge Services, A14 does not benefit from the same level of active travel connections to potential workforces, such as those provided by the proximity of Bar Hill and Northstowe, as it is located further away from the City of Cambridge.

3.1.9 Finally, notwithstanding the concerns raised above, there does not appear to have been any proper comparable, evidence based, assessment of the merits of four potential sites identified as potential allocations. This makes it difficult to understand the overall justification for site selection

3.1.10 Overall, TBBD do not consider that there has been a sufficiently robust assessment of the alternative site assessments, and more evidence is needed to justify the conclusions made.

3.1.11 To make the Plan sound, the following changes are considered necessary:

- Update the evidence base to accurately reflect the opportunities and constraints offered by all sites.
- Update the evidence based to provide a clear and comparable assessment of the site options to justify decisions made by the Council.
- Allocate additional land in the A14 corridor to meet the significant additional demand for industrial and warehousing floorspace identified in representations on Policy S/JH.

3.2 Policy S/SHF: Land North of A1307, Bar Hill (Slate Hall Farm)

3.2.1 A noted in our general comments on the site allocations, TBBD support the approach to recognising a need for industrial and warehousing floorspace in the key A14 corridor. However, in terms of the specific site allocations proposed, we have a number of concerns. In relation to Slate Hall Farm, these are:

- The focus on a single site with the potential to deliver strategic scale footprint buildings.
- The relatively convoluted access arrangements, compared to Tritax Park Queens' Cambridge, which can deliver direct access to the A14 J25, despite the Council's conclusions regarding the site being a dry island.
- The promotion arrangements, which cast doubt on delivery (specifically in the short term)
- The location on the edge of the Green Belt, meaning it is potentially more harmful to the purposes of the Green Belt than other alternative sites.

3.2.2 As noted in our comments on the Site Allocations generally we do not consider that a robust, logical and comparable assessment of the alternative sites has been undertaken to justify the selection of the site over other alternatives.

3.2.3 TBBD do not disagree that the site is suitable for development per se, but that insufficient justification and detailed assessment has been undertaken to enable justification for the selection of the site over Tritax Park Queens' Cambridge (HELAA References 40121 and 40244).

3.2.4 To make the Plan sound, the following changes are considered necessary:

- Update the evidence base to accurately reflect the opportunities and constraints offered by all sites.
- Allocate additional land in the A14 corridor to meet the significant additional demand for industrial and warehousing floorspace identified in representations on Policy S/JH.
- Allocate Tritax Park Queens' Cambridge (Land North of A14, J25, Bar Hill) as an alternative or addition to Slate Hall Farm (noting separate representations have been made on the need for an increased supply of employment land).

3.3 Policy S/RRA/SCS Land to the south of Cambridge Services, A14

3.3.1 As noted in our general comments on the site allocations, TBBD support the approach to recognising a need for industrial and warehousing floorspace in the key A14 corridor. However, in terms of the specific site allocations proposed, we have a number of concerns. In relation to Land South of Cambridge Services, these are:

- No comparable assessment has been undertaken to compare the merits of the site to Tritax Park Queens' Cambridge (HELAA References 40121 and 40244).
- The site has been selected despite being in a less accessible location than Tritax Park Queens' Cambridge. The site is more remote to the city, limiting scope for access via active travel routes and limiting the potential for sustainable last mile deliveries (noted as a reason for selecting Slate Hall Farm (Development Strategy Topic Paper, Appendix 7, Paragraph 3.3)).
- The site seems to have only been compared to Brickyard Farm and not Tritax Park Queens' Cambridge. It is unclear why this approach has been taken.
- The extent of surface water flooding applicable to this site, in addition to the localised requirement for betterment to the Swavesey Internal Drainage Board and historic flood events downstream would likely be a constraint to the extent of development that could be achieved upon this site.

3.3.2 Overall, whilst the site has some site-specific benefits in terms of access to services and facilities, there is no proper justification as to why the site has been selected against the reasonable alternatives.

3.3.3 To make the Plan sound, the following changes are considered necessary:

- Update the evidence base to accurately reflect the opportunities and constraints offered by all sites.
- Allocate additional land in the A14 corridor to meet the significant additional demand for industrial and warehousing floorspace identified in representations on policy S/JH.
- Allocate Tritax Park Queens' Cambridge (Land North of A14, J25, Bar Hill) as an alternative or addition to Land to the south of Cambridge Services, A14 (noting separate representations have been made on the need for an increased supply of employment land).

4.0 Representations – Climate Change

4.1 Policy CC/NZ: Net zero carbon new buildings

4.1.1 As alluded to elsewhere within our representations, there are several development management policies within the Plan which seek to exceed other consenting regime requirements, thereby adding onerous requirements onto development which is unsound and unjustified.

4.1.2 The NPPF 2026 whilst not the examining plan at Annex A, Paragraph 2 effectively requires a consistency check between Local Plan policies and the National Development Management Policies of the Framework. Where materially inconsistent, Local Plan policies will carry very limited weight, and weight applied to the Framework instead.

4.1.3 Furthermore, Policy PM13 of the 2026 NPPF goes further in respect to Setting Standards, where it is clear that quantitative standards set through development plan policies for design should provide clarity and a high degree of certainty about the requirements that development proposals are expected to meet.

4.1.4 In respect to such standards these policies should be justified, drawing upon relevant evidence of local characteristics and needs and that evidence in support of standards should be proportionate, especially where relevant national standards already exist. More importantly such policies should not cover matters that are already addressed by Building Regulations.

4.1.5 In respect to energy efficiency, standards that go beyond the current or proposed Building Regulations (UK NSCBS & 2020 Energy Use Intensity limits) should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development.

4.1.6 The Council needs to ensure that development management policies are consistent at this stage, and we have found no record of such an exercise being carried out as part of this process, and the transitional arrangement of Annex A, Paragraph 2 would seemingly not apply to these policies as they have not been examined and adopted against the 2026 Framework. Therefore, Policy DM7 of the 2026 Framework would apply where the Council is seeking to exceed matters controlled by other statutory regimes.

4.1.7 Whilst supportive of the premise of many of these conditions, ensuring consistency with other consenting regimes is important for investor confidence; or where standards are exceeded it is clearly evidenced as to why and its viability. This follows on from the concerns we have with the Local Plan evidence base as discussed under the affordable workspace policy (Policy J/AW).

4.1.8 To make the Plan sound, the following changes are considered necessary:

- TBBD are concerned that there is little to no or evidence as to why these requirements are necessary beyond the national requirements under the relevant regimes or how viable these are across such a range of uses. It is therefore felt that they are not justified as currently worded and should be modified accordingly.

4.2 Policy CC/WE: Water efficiency in new developments

4.2.1 As alluded to elsewhere within our representations there are several development management policies within the Plan which seek to exceed other consenting regime requirements, thereby adding onerous requirements onto development which is unsound and unjustified.

4.2.2 The NPPF 2026 whilst not the examining plan at Annex A, Paragraph 2 effectively requires a consistency check between Local Plan policies and the National Development Management Policies of the Framework. Where materially inconsistent, Local Plan policies will carry very limited weight, and weight applied to the Framework instead.

4.2.3 Furthermore, Policy PM13 of the 2026 NPPF goes further in respect to Setting Standards, where it is clear that quantitative standards set through development plan policies for design should provide clarity and a high degree of certainty about the requirements that development proposals are expected to meet.

4.2.4 In respect to such standards these policies should be justified, drawing upon relevant evidence of local characteristics and needs and that evidence in support of standards should be proportionate, especially where relevant national standards already exist. More importantly such policies should not cover matters that are already addressed by Building Regulations.

4.2.5 In respect to energy efficiency, standards that go beyond the current or proposed Building Regulations (UK NSCBS & 2020 Energy Use Intensity limits) should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development.

4.2.6 The Council needs to ensure that development management policies are consistent at this stage, and we have found no record of such an exercise being carried out as part of this process, and the transitional arrangement of Annex A, Paragraph 2 would seemingly not apply to these policies as they have not been examined and adopted against the 2026 Framework. Therefore, Policy DM7 of the 2026 Framework would apply where the Council is seeking to exceed matters controlled by other statutory regimes.

4.2.7 Whilst supportive of the premise of many of these conditions, ensuring consistency with other consenting regimes is important for investor confidence; or where standards are exceeded it is clearly evidenced as to why and its viability. This follows on from the concerns we have with the Local Plan evidence base as discussed under the affordable workspace policy (Policy J/AW).

4.2.8 To make the Plan sound, the following changes are considered necessary:

- TBBD are concerned that there is little to no or evidence as to why these requirements are necessary beyond the national requirements under the relevant regimes or how viable these are across such a range of uses. It is therefore felt that they are not justified as currently worded and should be modified accordingly.

5.0 Representations – Biodiversity and Green Spaces

5.1 Policy BG/BG: Biodiversity and Geodiversity

5.1.1 Policy BG/BG is an example of a policy within the Local Plan which directly conflicts with the 2026 NPPF, largely as a result of the timing of its publication. Specifically, Bullet 2 of Policy BG/BG, which requires major development to deliver a 20% net gain, which directly conflicts with decision making Policy N2 (3) of the new NPPF which sets out that Decision Makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework which stands at 10% (unless the policy is site specific, which is not the case with the Local Plan). Furthermore, there is no evidence to justify the position taken in this policy and why it is necessary to depart from the national standard.

5.1.2 Therefore, whilst the Local Plan is not being examined against the new NPPF, TBBD suggest it would be prudent to update policies such as Policy BG/BG where there is a clear conflict with the development management policies of the 2026 NPPF to avoid the Local Plan being immediately in conflict.

5.1.3 Changes suggested to make the plan sound:

- Remove reference at Bullet 2 to major development being required to deliver a 20% net gain in biodiversity.

6.0 Representations – Wellbeing and Social Inclusion

6.1 Policy WS/NC: Meeting the needs of new and growing communities

6.1.1 As set out in our Regulation 18 representations, whilst the need to support the delivery of sustainable communities is acknowledged and supported by TBBD, the need for employment developments over 5,000m² to be informed by detailed community needs assessments, stakeholder engagement strategies, and potentially community development measures are disproportionate and not justified by national policy. Such requirements risk placing unreasonable and unclear obligations on commercial schemes, when the key driver to the need for additional services is the growing residential population which is directly linked to the delivery of housing, not commercial floorspace.

6.1.2 The policy lacks clarity on the nature and scope of services and facilities that are expected to be delivered or funded by commercial development, creating unnecessary uncertainty and viability risk. Commercial developments already make appropriate contributions through the potential for future CIL and or Section 106 obligations, where impacts are identified and clearly evidenced.

6.1.3 To make the Plan sound, the following changes are considered necessary:

- The policy should be amended to clearly distinguish between residential and commercial development, ensuring that requirements for community facilities, engagement, and ongoing management are proportionate, evidence-based, and directly related to demonstrable impacts arising from the development, consistent with national planning policy and the statutory tests for planning obligations.

7.0 Representations – Jobs

7.1 Policy J/NE: New employment development proposals

7.1.1 TBBD welcome the change from the Regulation 18 version of the Local Plan with the policy (Bullet 8) now allowing for large scale warehousing and distribution facilities to meet national or regional needs. This is an improvement of the Regulation 18 draft which ruled out any such use to meet national needs. The revised policy helpfully aligns better with Policy S5 of the 2026 NPPF which allows development outside settlements where a need can be justified and will be a material consideration in determining applications alongside the Local Plan.

7.1.2 However, we still consider that a number of changes are required to the policy to provide clarity and ensure it will be effective.

7.1.3 The policy should make it clear that it relates to the provision of facilities over and above those planned for in the Local Plan. This can be assumed by reference to unmet need in the policy, but adding reference to sites being outside planned limits of development and allocated sites on the proposal map would provide clarity on this point. The policy should explicitly cross reference to Policies S/DS and S/DE to clarify the relationship between the policies.

7.1.4 There is a need to clarify how unmet need will be defined, either in the policy or the supporting text because, at the moment, it is unclear what an applicant would be expected to provide to justify a need exists either in quantitative or qualitative terms. We would advocate that beyond any evidence of a lack of delivery or a stalling of committed sites, such as allocations, that a market needs assessment setting out interest and requirements from occupiers would be a sensible starting point, outlining the demand and supply dynamics of the commercial market. Given the importance of Greater Cambridgeshire this should not be limited to a local context, but also a national and regional context.

7.1.5 The Local Plan is clear (as set out at Paragraphs 8.17 and 8.18), that the allocations in the Local Plan are to meet local need only (i.e. not regional or national) but, in reality, there is very little a Local Plan can do to prevent the floorspace built on allocated sites being taken up by regional and national operators. Furthermore, as set out elsewhere, notwithstanding our views on the extent of additional local need that is required, the strategic national importance of the A14 for freight and logistics and Greater Cambridgeshire as an economic centre, should and cannot be ignored. This is outlined in the June 2026 Ministerial Statement by Housing and Planning Minister, Matthew Pennycook, in the announcement on the establishment of the Greater Cambridgeshire Development Corporation: "*To promote ambitious, high quality, sustainable growth and unlock the full potential of Greater Cambridge, for the benefit of its communities* ***and the country as a whole*****"** and "*the focus on the* ***delivery of strategic, nationally significant growth*** *in its boundary*" (**our own emphasis**).

7.1.6 In our view, the recent suppression of the warehousing and industrial sector in the area (due to a lack of land supply and the draw on the Cambridge economy) means that there is significant demand from national operators in the area, as demonstrated by DPD taking a pre-let agreement on the Tritax Park Queens' Cambridge site (HELAA References 40121 and 40244).

7.1.7 If national or regional operators take up floorspace in allocated sites, this will mean that local demands will not be able to be met. Therefore, TBBD consider that rather than the policy specifically referring to meeting national or regional need, it should simply refer to proposals meeting unmet needs for employment floorspace generally, which would ensure it is effective in supporting the objective of delivering sufficient floorspace to meet the needs of the area.

7.1.8 This is emphasised by the significance and strategic importance of the A14 nationally but also the pull and market interest driven by the proximity to Cambridge.

7.1.9 To make the Plan sound, the following changes are considered necessary:

- Update the policy to provide clarity that Bullet 8 applies to sites outside the defined limits of development and allocations.
- Update the policy to explicitly reference the relationship with Policies S/DS and S/DE.
- Provide clarity as to how unmet need will be demonstrated and whether this is a quantitative or qualitative assessment (or both).
- Remove reference in the policy to meeting national and regional need, with the policy amended to refer to unmet need generally.

7.2 Policy J/AW: Affordable workspace and creative industries

7.2.1 The justification for this policy seems to suggest that the requirement is due to a shortage of affordable workspace for start-up businesses and small and medium-sized enterprises (SMEs) across Greater Cambridge. Furthermore, this issue is more apparent closer to Cambridge City, as tenants are priced out of the market due to high rents and long waiting lists.

7.2.2 The requirement for this policy to bite on B2/B8 uses to meet this policy is completely non-sensical in the context of the extent of supressed need in this sector (particularly B8), given the policy restriction that has been in place since the last adopted Local Plan. The issue for affordable workspace in the B2/B8 sector is primarily driven by the lack of supply and delivery over a significant period of time.

7.2.3 If this policy can be evidenced for the B2/B8 sector, which we strongly believe it cannot, then it should be attributed to site specific allocations and not a blanket policy which may ultimately conflict with other aims and objectives of the Plan in respect of sustainable development.

7.2.4 Such requirements risk placing unreasonable and unclear obligations on commercial schemes within these use classes, which cannot be sustained, particularly given the limitations being planned for in respect to the amount of floor space and flexibility in sites seeking to be allocated. This policy will place an added burden on development that could impact viability and delivery of development.

7.2.5 To make the Plan sound, the following changes are considered necessary:

- The policy should be amended to clearly remove the requirement for affordable workspace for B2/B8 uses and if evidenced, should be applied to site specific allocations, where viability tested.

APPENDIX 1
BIDWELLS B2/B8 NEED IN GREATER CAMBRIDGE (REGULATION 18 EVIDENCE)

NEED FOR B2/B8 IN GREATER CAMBRIDGE

Introduction

1. Tritax Big Box Developments ("Tritax") have instructed Bidwells LLP to undertake a review of the evidence base underpinning the emerging Greater Cambridge Local Plan ("GCLP") as it relates to the need for General Industrial (Use Class B2) and Storage and Distribution (Use Class B8) floorspace and undertake an independent assessment of the objectively assessed need.

2. The documents reviewed from the evidence base comprise:

    - GCLP Draft Topic Paper: Jobs, December 2025.
    - GCLP Draft Topic Paper: Development Strategy, December 2025.
        - Specifically, Appendix 17: Greater Cambridge Employment Trajectory, October 2025.
    - Iceni Greater Cambridge Employment and Housing Needs Update 2024-2045, September 2025 ("the 2025 Update").
    - Iceni Greater Cambridge Employment and Housing Evidence Update, January 2023.
    - Iceni Greater Cambridge Growth Sectors Study: life science and ICT locational, land and accommodation needs, September 2024.
    - Iceni Greater Cambridge Warehouse and Industrial Space Needs, March 2025 ("the WISN report").

Review of the Evidence Base

3. The GCLP evidence base has evolved and fragmented with Iceni producing sector specific reports and several updates. We recommend that for the Regulation 19 consultation a single complete report, dispensing with historical analysis that is no longer relevant, will be essential. As part of this, we recommend that the report includes considerably more supporting data to substantiate the approach taken, which is severely lacking from the September 2025 update. As a leading national logistics developer, Tritax and Bidwells would be happy to engage with the Council on this as per the Planning Practice Guidance that requires *"discussions with developers and property agents and engagement with business and economic forums"* (PPG Paragraph 2a-026-20190220), and specifically in relation to logistics, *"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"* (PPG Paragraph 2a-031-20190722).

4. We have not been able to identify at any point in the 2025 Update a table that sets out the number of jobs forecasted to 2045 by industrial sector. The key sectors benefit from some small graphs, but there is no such equivalent for non-key sectors such as industry and warehousing. Without this evidence it is impossible to follow how the labour-based floorspace requirements in Table 5.1 have been calculated.

5. The figure of around 317,000m2 for industry and warehousing set out in paragraph 5.40 of the 2025 Update is not labour-based but instead is derived from a market signals assessment found within the WISN report. The labour-based approach is however still important to understand the compatibility between the two approaches.

6. The WISN report provides a summary of the existing employment sites in Greater Cambridge in terms of their general status and notable occupiers. It does not consider quantitatively vacancy rates, nor

does it include any analysis of the risk of these sites being converted to a non-industrial or warehousing use, which is generally supported in national planning policy and guidance. There is also no analysis whether it would be desirable to retain each of these sites in the current use.

7. The WISN report then seeks to break down the specific use type to which the industrial and warehousing floorspace is being operated as:

    - Manufacturing (general / low tech)
    - Wholesale
    - Distribution
    - Mid-tech and advanced manufacturing

8. It is key to understand that these are not Use Classes, and it is likely that the floorspace is a mixture of B2 and B8, with notable amounts also benefiting from Use Class E(g) business uses (office, research and development, and light industrial). There is nothing to stop floorspace that is subject to multiple use classes from switching use depending on the needs of the occupant at that time. Consequently, it is the overall trend in growth of industrial and warehousing floorspace and the overall changes in employment that are important.

9. The only time it is relevant to consider sub-sectors is when determining the size of units that should be built in the future and therefore the size of the sites that should be allocated. However, this should not be determined based on employment trends historically, which largely reflect the space that is available, not necessarily the space that is needed. Consequently, this part of the assessment should be focused on future requirements based on market knowledge from local agents.

10. Another important distinction that the WISN makes is to discount any warehousing needs that do not meet the specific needs of the Greater Cambridge market, including those serving the rest of Cambridgeshire (WISN paragraph 5.2). This is somewhat naive since there will be significant overlap between the needs of local occupiers versus others and once allocated, the Councils have limited control over who occupies the space that is built. It is understood that this is an attempt to limit the number of very large floorplates which generally have greater building heights, but manipulating and constraining the objectively assessed need for floorspace in this way is clearly contrary to national planning policy and guidance. It is likely that constraining the supply in this way will only result in the continued undersupply of industrial and warehousing floorspace, particularly if national and regional occupiers are able to out-bid smaller local occupiers for the same floorspace.

11. Consequently, we are concerned that:

    - A lack of transparency in the analysis due to a lack of quantitative evidence.
    - No meaningful analysis of whether existing industrial and warehousing sites may continue to operate as such or may be under pressure from alternative uses.
    - An over complicated analysis of employment trends to determine future needs with little consideration, based on local agent advice, of how this may change in the future.
    - A fundamental concern that the objectively assessed need for industrial and warehousing floorspace is being constrained by perceived environmental factors, contrary to national planning policy and guidance.

An Alternative Approach

Understanding Market Suppression

12. Not every local market will have the same profile of industrial sectors by employment, floorspace or output (measured as Gross Value Added (GVA)). If this was the case, specialisms such as Greater Cambridge could not happen. However, despite these specialisms every local market needs a diverse range of sectors to function and consequently comparisons between different geographies can be useful to determine where there are deficiencies. Deficiencies can occur for many reasons, including market failures, but also policy interventions.

13. In the case of Greater Cambridge, a side effect of the focus on research and development (R&D) has been to suppress the ability of other industrial sectors to grow. Policy P9/7 of the Cambridgeshire and Peterborough Structure Plan (2003) stated that:

> *"Policy P9/7 – Selective Management of Employment Development*
>
> *Employment land in and close to Cambridge will be reserved for development which can demonstrate a clear need to be located in the area in order to serve local requirements or contribute to the continuing success of the Sub-Region as a centre of high technology and research. Development proposals must demonstrate that they fall into one or more of the following categories:*
>
> *a) high technology and related industries and services concerned primarily with research and development including development of D1 educational uses and associated sui generis research institutes, which can show a special need to be located close to the Universities or other established research facilities or associated services in the Cambridge area;*
>
> *b) other small-scale industries which would contribute to a greater range of local employment opportunities, especially where this takes advantage of, or contributes to the development of, particular locally based skills and expertise;*
>
> *c) the provision of office or other development providing an essential service for Cambridge as a local or Sub-Regional centre."*

14. Even before this, the 1995 Structure Plan Policy SP5/3 stated that:

> *"Within the Cambridge area, land will be reserved for development which has a clear need to be located close to the city in order to serve local requirements or to contribute to the continuing success of Cambridge as a major centre for research and development."*

15. While Policy SP5/4 stated that:

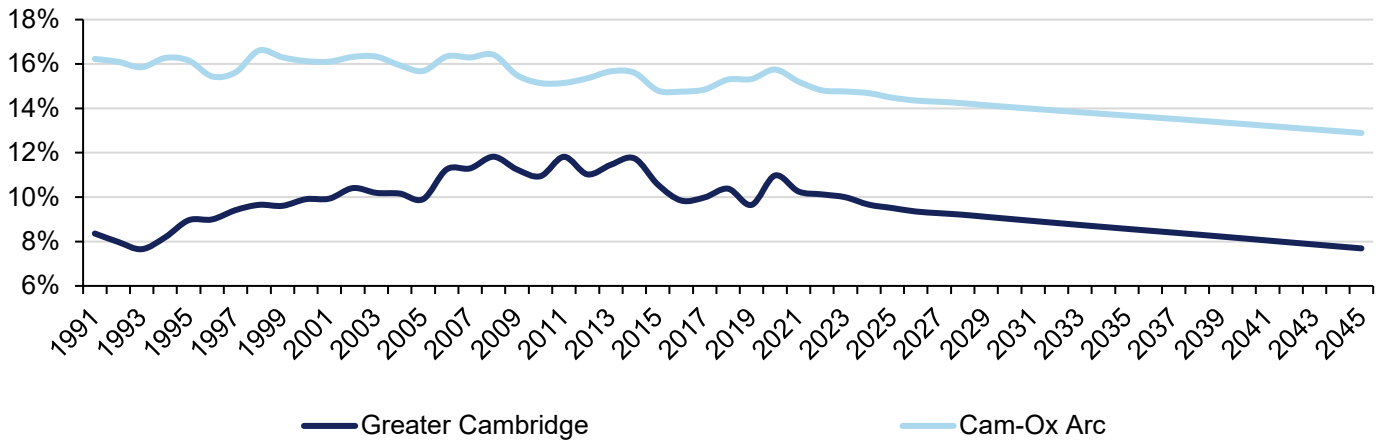
> *"Provision has been made within Policy SP5/1 to meet the land requirements of high technology and related industries. Particular attention will be paid to the need to preserve and enhance the special character of Cambridge, and to the need to create conditions suitable for high technology growth in other parts of the county outside the city. Firms who do not need close physical proximity to the city will be encouraged to locate elsewhere in the county."*

16. By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc (**Figure 1**). Clearly there has been an intentional suppression of these industrial sectors in Greater Cambridge through planning policy since at least the 1990s and is now manifesting itself through a notable difference in economic output.

17. Note that the industrial sector names referred to in this assessment are the names of the sections set out in the UK Standard Industrial Classification 2007 (SIC2007). Each section is given a letter: 'C' for Manufacturing and 'H' for Transport and Storage.

18. While Iceni has sought to use various sub-sectors to measure the employment most likely associated with floorspace operating in certain use classes, given that much of the data used is subject to notable caveats, such detailed analysis is unlikely to provide the level of accuracy that Iceni intends. Bidwells preferred approach is to use the SIC sections rather than sub-sectors in most cases since these are likely to be the most accurate at the local authority level. For B2 and B8 floorspace, there is a clear synergy with the C and H sections and therefore we apply these as "the B2/B8 sectors".

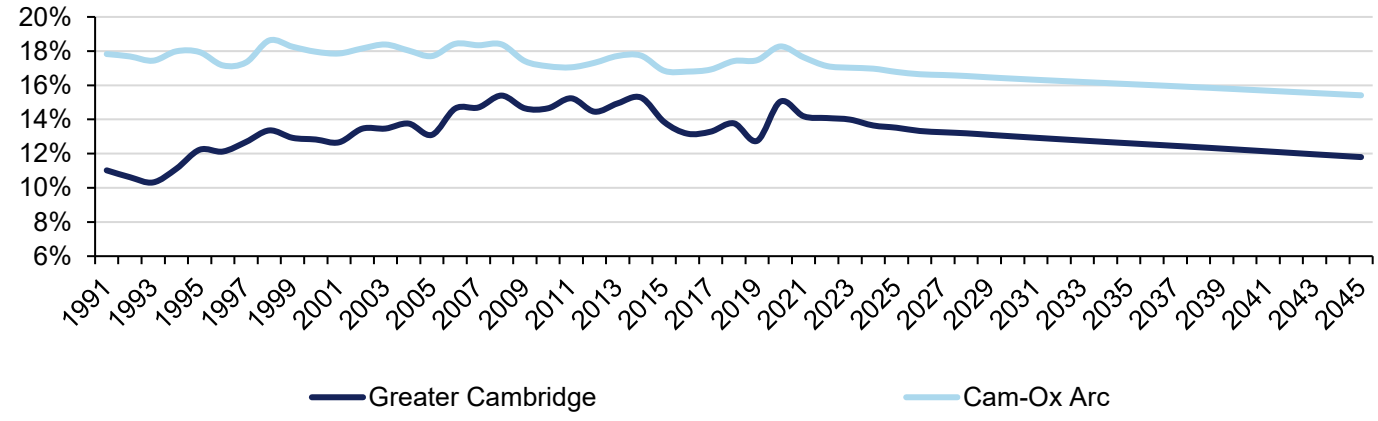
Figure 1: The B2/B8 sectors GVA as a percentage of total GVA



Source: Bidwells analysis of Oxford Economics data

19. However, as discussed above, this suppression was implemented at the time for the purposes of developing Greater Cambridge's specialist R&D industries, which principally fall within the Information and Communication (SIC code J) and the Professional, Scientific and Technical Activities (SIC code M) sectors ("the R&D sectors"). If these are removed from the total GVA and the percentage is recalculated the B2/B8 sectors account for 13.6% of GVA while across the Arc they account for 17.0% (**Figure 2**). The gap has reduced but is still clearly notable and therefore, arguably, suppression of around 3.4% exists once adjusted for Greater Cambridge's specialisms. In this instance we have based our analysis on the latter excluding the R&D sectors, but have included sensitivity analysis with these included.

Figure 2: The B2/B8 sectors GVA as a percentage of total GVA minus the R&D sectors



Source: Bidwells analysis of Oxford Economics data

Industrial Floorspace

20. The Valuation Office Agency (VOA) produces estimates of 'industrial' floorspace for each local authority each year with the current dataset covering the period 2011-2025. The term industrial can cover a multitude of uses and does not align well with the use class system. Furthermore, uses can change as can their use class, meaning that any measure of floorspace in terms of the industrial sector using it and the use class that is currently active must come with a host of caveats.

21. Iceni have tried to address this by trying to separate out floorspace that could be used for B2/B8 but is probably currently in E(g) use. We can understand why Iceni have sought to do this but ultimately, we consider this to cause more problems than it solves: if this floorspace retains the possibility for use as B2/B8 it might occur in the future. Equally, it is inevitable that some B2/B8 floorspace proposed in the future will also be taken up by E(g) uses. Ultimately, this is an important flexibility within the planning system that economic modelling needs to address rather than seek to constrain.

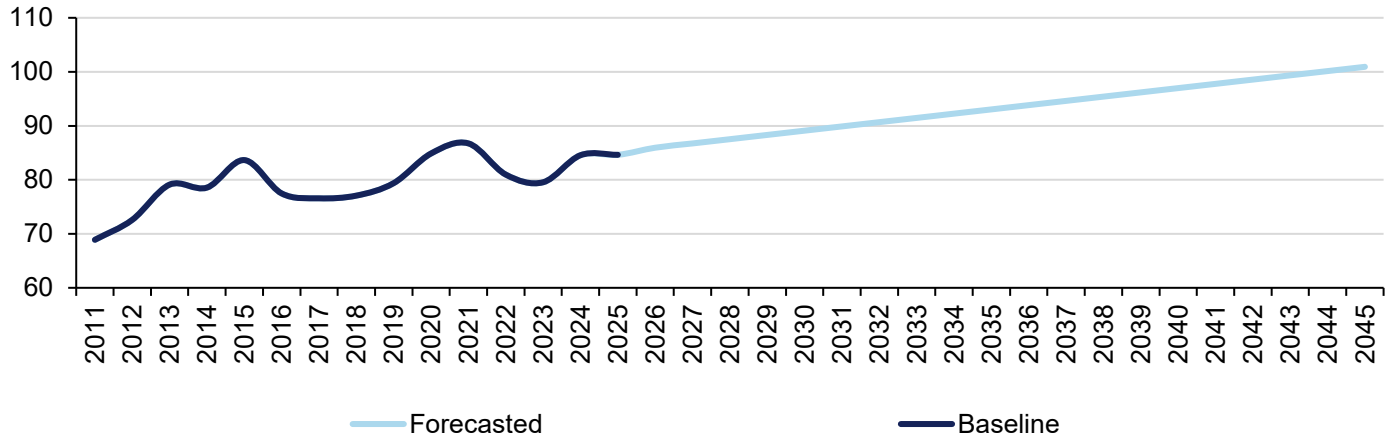
22. Taking this into account, we have simply assumed that the VOA industrial floorspace is occupied by the B2/B8 sectors.

Economic Rate Comparisons

23. One way to test if our assumption that all industrial floorspace can be treated as B2/B8 is to generate rates that can be independently verified. For example, using the industrial floorspace from VOA and the employment estimates for the B2/B8 sectors from Oxford Economics, it is estimated that over the period 2011-2025 that average employment density in Greater Cambridge has been 80m^2 per job. This is entirely reasonable and comparable to industrial standards and benchmarks such as those set out in the HCA Employment Densities Guide (2015).

24. These employment densities also exhibit an expected trend with densities decreasing from 69m^2 per job in 2011 to 85m^2 per job in 2025, which reflects increased automation in these sectors.

Figure 3: Change in average employment densities for B2/B8 floorspace in Greater Cambridge



Source: Bidwells analysis of Oxford Economics and VOA data

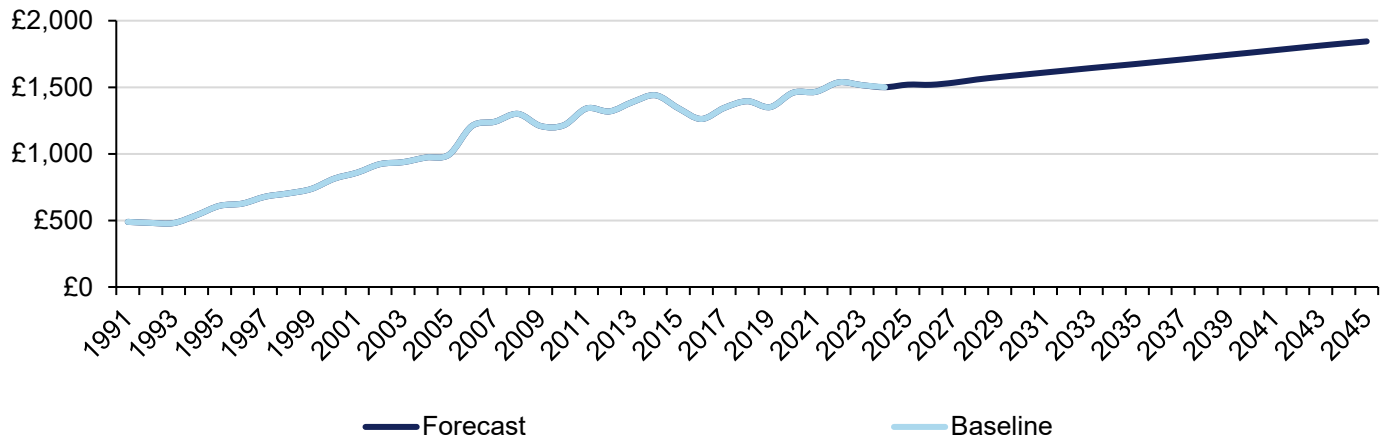
The Forecast

25. For this exercise we have based our B2/B8 sector floorspace upon the Oxford Economics forecasts for Greater Cambridge. These forecasts suggest that employment will reach 305,000 jobs in 2045, which falls between Iceni's Central (300,200 jobs) and High (318,300 jobs) scenarios. Unfortunately, we have not been able to find a breakdown of jobs by industry in the Iceni report, which highlights our concern regarding the lack of supporting data in the assessment. Without this we cannot make further comparisons on employment.

26. The Iceni scenarios suggest considerably less employment than those set out in the Oxford Economics report produced for the MHCLG. This report suggests that the Greater Cambridge area could reach 465,000 jobs by 2050. Therefore, it would appear highly likely that Iceni's central scenario could be comfortably exceeded by 2045.

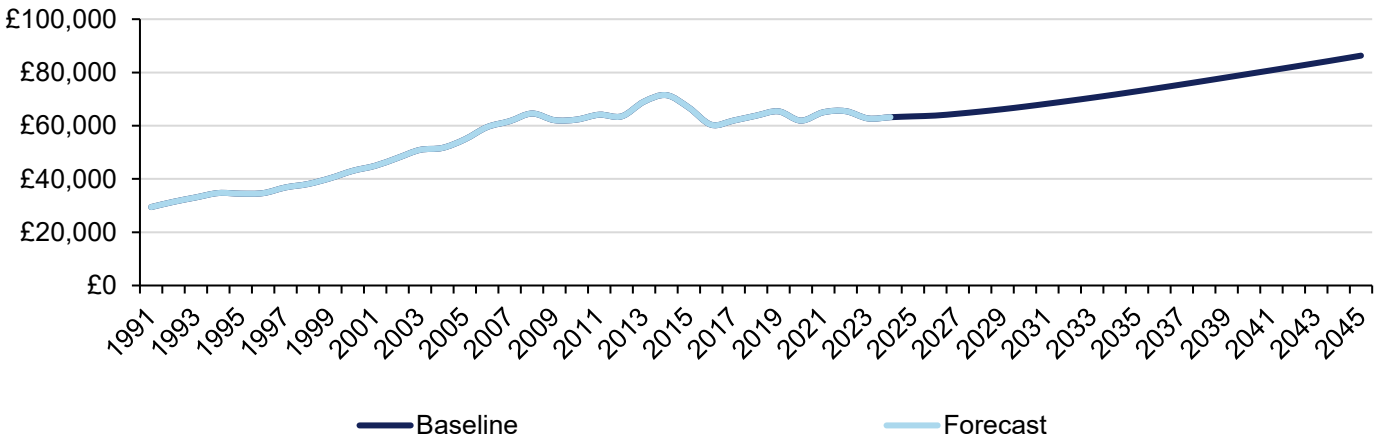
27. Our preferred approach to forecasting is to primarily use GVA by industry. GVA is an exceptionally stable dataset and is therefore ideal for long term forecasting (**Figure 4**). By then forecasting the GVA per job rate (**Figure 5**), GVA can be readily converted to jobs and the forecasted floorspace per job (employment density, **Figure 3** above) can then convert this to floorspace.

Figure 4: Output from the B2/B8 sectors 1991-2045 (GVA, £m)



Source: Bidwells analysis of Oxford Economics data

Figure 5: GVA per job from the B2/B8 sectors 1991-2045



Source: Bidwells analysis of Oxford Economics data

28. To reflect suppression, we take the percentage GVA of the B2/B8 sectors seen in 2045 in Greater Cambridge (7.7% as shown in **Figure 1**) and increase this to reflect the percentage for the entire Arc (12.9%) this is converted to floorspace as described above. From this the known floorspace in 2024 is subtracted to estimate that gross need. From this the commitments set out in the Iceni reports of 28,595m^2 are removed to determine the overall need. **The result of this is a need of 948,300m^2 net additional B2/B8 floorspace**.

29. This is clearly a substantial increase in floorspace and reflects modelling for the whole economy. However, as set out previously, it would be more appropriate to remove the specialist R&D sectors before making comparisons between geographies. Using the same method as above but instead applying the difference between Greater Cambridge and the Arc seen in **Figure 2**, **this results in a need for 424,900m^2 net additional B2/B8 floorspace**.

30. Note that we have not included any adjustments for vacancies or flexibility in this. Since this assessment has considered total industrial floorspace throughout, vacant floorspace assumptions are embedded. In terms of flexibility, we consider the adjustment in GVA to reflect sufficient flexibility if the figure is considered a minimum in accordance with the NPPF.

31. Note also that no distinction is made between local needs and national/regional needs in this assessment, as discussed in Paragraph 10 above.

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Trumpington Road, Cambridge CB2 9LD