NEWLANDS PARK CAMBRIDGE: BRICKYARD FARM, BOXWORTH CB23 4WU

Greater Cambridge Local Plan Regulation 19 Representations

On behalf of Newlands Developments
September 2026

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EXECUTIVE SUMMARY

These Representations have been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Newlands (Cambridge) Limited (Newlands), to the Greater Cambridge Proposed Submission Local Plan (Regulation 19) Consultation ('the Proposed Submission Plan') that is open until 25th September 2026.

The Representations relate to an 88-hectare site, known locally as 'Brickyard Farm, Boxworth Farm, Boxworth' that is being promoted by Newlands Developments for up to 160,000 sqm of logistics floorspace (Use Class B8), as well as HGV parking (Sui Generis) alongside substantial areas of green and blue infrastructure. Further details are contained in the Opportunity Document at Appendix 5 to these representations.

The Site, which will be known as Newlands Park Cambridge, is under the control of Newlands who have an excellent track record and will be responsible for its promotion, delivery and management.

These Representations should be read in conjunction with the Representations made at the Regulation 18 stage, which are included as Appendix 2.

The key points we wish to make are as follows:

1) The GCLP is considered 'unsound' when assessed against the tests of soundness contained in Paragraph 36 of the 2024 NPPF. It is not positively prepared, justified, effective nor is it consistent with national policy that recognises logistics as being vital to the UK economy.

2) The evidence base has ignored strategic employment need altogether, and plans for local Industrial and Logistics (I&L) needs only. Consequently, the Greater Cambridge Local Plan (GCLP) fails to plan for its objectively assessed need (as a minimum).

3) In doing so, the GCLP has failed to follow the clear guidance contained in the PPG around assessing the need for strategic logistics:

    - It has not assessed strategic need across the FEMA. The broad consensus is that this should be the Cambridgeshire and Peterborough Combined Authority (CPCA) geography that will form the basis of the upcoming SDS;

    - It has ignored key market signals that indicate a severely supply constrained market (i.e. immediate need/strong occupier demand for larger, modern units, extremely low vacancy rates and rental growth ahead of inflation); and

    - There has been a distinct lack of co-operation between the Greater Cambridge local authorities and those neighbouring around the apportionment of strategic need despite it being a good time to undertake this exercise given a number of the local plans are at the same stage (Regulation 19).

4) Whilst there has been a relaxation in the restriction on strategic logistics under Draft Policy J/NE from the Regulation 18 stage, this does not go far enough, and the policy continues to be unsound as it continues to have no regard to key markets signals. As referenced in Regulation 18 representations, the West Suffolk Local Plan Examination sets a clear precedent that supports our assertion.

5) The proposed approach of dealing with the assessment of strategic need through the forthcoming SDS evidence base will mean immediate strategic needs are not addressed through local plan allocations for a considerable period of time. This will result in a prolonged planning hiatus / policy lacuna. This is further compounded by the SDS process itself, that is fraught with uncertainty.

6) Rather than being deferred, the strategic needs should be dealt with now, through the GCLP as advocated by the NPPF. Various good practice examples from Leicestershire, Warwickshire and Northamptonshire have been presented that provide a blueprint for the GCLP going forward.

7) Newlands' economic experts, Stantec, have undertaken a PPG-compliant assessment of strategic need across the FEMA, which, when apportioned down to Greater Cambridge, identifies an objectively assessed need figure of 709,000 sqm. As such, the Draft GCLP policies should be amended to reflect this and additional employment sites allocated to meet this need.

8) Newlands Park Cambridge is strategically located to accommodate up to 22% of Greater Cambridge's need whilst delivering a plethora of other economic, social and environmental benefits. Following extensive engagement with Greater Cambridge's Shared Planning Team, other key stakeholders and the local community, an outline planning application is being submitted imminently. This signals Newlands' intent to deliver these benefits as early as possible in the Plan Period. The Site's allocation within the GCLP would go some way to remedying its current soundness issues, but would also provide a robust basis to guide the determination of this application.

9) Aside from Draft Policies S/JH and J/NE, Newlands have also put forward a number of other suggested policy modifications in Section 4 that are deemed necessary to make the Proposed Submission Plan sound.

10) Newlands through Twenty5, wishes to participate in the Examination hearing sessions relevant to the matters raised within these duly made Representations. Newlands reserves the right to submit further Representations, including Matters Statements, as the Examination progresses.

11) In the meantime, Newlands would welcome the opportunity to engage with the Councils on the matters raised in these representations in advance of submission for Examination.

1 INTRODUCTION

1.1 Introduction

1.1.1 These Representations have been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Newlands (Cambridge) Limited (Newlands), with respect to the Greater Cambridge Proposed Submission Local Plan (Regulation 19) Consultation ('the Proposed Submission Plan'). They are made in respect of land referred to locally as 'Brickyard Farm, Boxworth Farm, Boxworth' (HELAA Reference 47353) that is being promoted as 'Newlands Park Cambridge' ('the Site'). The Site is under the control of Newlands as the Developer ('the Developer') who will be responsible for the delivery and management of the Scheme.

1.1.2 The Site relates to land to the South of the A14, which extends to circa 88 hectares within the administrative area of South Cambridgeshire District. It is being promoted for up to 160,000 sqm of storage and distribution floorspace (Use Class B8) as well as HGV parking (Sui Generis) with substantial areas of green and blue infrastructure, including new tree planting that will deliver increased canopy cover and a Biodiversity Net Gain well in excess of 10%. The proposed development would be served by a new point of access from the southern dumbbell of Junction 24 of the A14 'Swavesey Junction' providing direct access for vehicles to the A14.

1.1.3 The Site has been promoted by Newlands throughout the preparation of the Greater Cambridge Local Plan ('the GCLP'), as part of the following consultations:

- Call for Sites (2019)
- First Proposals (2021)
- Revised Call for Sites (March 2025)
- Greater Cambridge Local Plan Regulation 18 Consultation (January 2026).

1.1.4 These Representations build upon those previous submissions and consider the soundness of key policies within the Regulation 19 Draft Plan against the tests of soundness set out in the National Planning Policy Framework (December 2024) ('the 2024 NPPF').

1.1.5 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, before submitting a local plan for independent examination, a local planning authority must invite representations on the plan as proposed for submission.

1.1.6 Section 20(5) of the Planning and Compulsory Purchase Act 2004 requires the appointed Inspector to consider whether a local plan is "sound". The recently published NPPF (August 2026) confirms in Paragraph 8 of Annex A that plans which are not being prepared under the plan-making system introduced by the 2026 Regulations are to be prepared and examined in accordance with the 2024 NPPF.

1.1.7 The updated Greater Cambridge Local Development Scheme (July 2026) anticipates submission of the Greater Cambridge Publication Plan for Examination by 31 December 2026. On that basis, the GCLP is expected to remain within the transitional arrangements and to be examined against the 2024 NPPF.

1.1.8 Paragraph 36 of the 2024 NPPF states that Local Plans will be considered 'sound' at Examination if they are:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.1.9 In addition, Paragraph 16 of the 2024 NPPF states that Local Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and,

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

1.1.10 In line with submissions made at the Regulation 18 stage, these representations consider that the Proposed Submission Plan fails to effectively plan for economic growth. Our representations focus principally on Draft Policies J/NE and S/JH, which we consider fail against all four tests of soundness set out above. The reasons for this are set out in the subsequent chapters of this document.

1.1.11 Accordingly, Newlands objects to the Proposed Submission Plan and considers that it is not sound. This statement should be read with the representation forms submitted alongside it. In summary, the parts of the Proposed Submission Plan objected to are Policy S/JH (New Jobs and Homes), Policy S/DS (the Development Strategy), Policy J/NE (New Employment Development Proposals), together with the Policies Map so far as it omits the Site. We also have comments in respect of Policy J/AW (Affordable Workspace and Creative Industries); Policy GP/LC (Protection, Conservation and Enhancement of Landscape Character); Policy I/ST (Sustainable Transport); Policy BG/BG (Biodiversity Net Gain); and Policy BG/UGF (Urban Greening Factor).

1.1.12 Newlands wishes to participate in the Examination hearing sessions on the matters raised in these duly made representations.

2 LOGISTICS & EMPLOYMENT NEED: THE KEY ISSUES

2.1 Introduction

2.1.1 Policies S/JH (New Jobs and Homes) and J/NE (New Employment Development Proposals) of the emerging GCLP are unsound, in their current form. These strategic policies are critical to the effectiveness of the GCLP in planning for economic growth and key growth sectors over the Plan Period (2024-2045). This includes logistics as stipulated in Paragraphs 86(c) and 87(b) of the 2024 NPPF.

2.1.2 This section of the Representations details how Policies S/JH and J/NE have not been positively prepared, are not justified and effective nor are they consistent with national policy, as required by Paragraph 36 of the 2024 NPPF. By association, Draft Policy S/DS (Development Strategy) is similarly flawed.

2.1.3 The Housing and Economic Development Needs Assessment section of the Planning Practice Guidance (PPG) highlights that local planning authorities must prepare robust evidence of existing business needs to inform development plan policy, and carry out assessments of need on a cross-boundary basis with neighbouring authorities within their Functional Economic Market Area (FEMA) (Paragraph 025 Reference ID: 2a-025-20190220). This is echoed in the section of the PPG entitled 'How can authorities assess need and allocate space for logistics?' (Paragraph 031 Reference ID: 2a-031-20190722):

2.1.4 A FEMA is a collection of administrative areas which share economic linkages as defined by travel to work patterns, housing market areas, shared infrastructure, labour skills, etc. For strategic logistics, these extend beyond a single administrative area because their supply chains, which link their suppliers and end customers, comprise of a significant drive time catchment. As such, the PPG calls for strategic policy-making authorities to collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market area.

2.1.5 Therefore, to align with the PPG, the first step in planning for strategic logistics is to understand what the relevant market geography is over which strategic need should be calculated.

2.2 The Functional Economic Market Area

2.2.1 The Cambridgeshire and Peterborough Combined Authority (CPCA) geography is the strategic planning area upon which the Cambridgeshire and Peterborough Spatial Development Strategy (SDS) will be formulated. As shown in Figure 2-1 of Stantec's 'Greater Cambridge Industrial and Strategic Needs Assessment' (September 2026) (Appendix 3), it is considered this is the 'best fit' FEMA for the calculation of strategic logistics in line with the PPG. This view is corroborated by both the Cambridgeshire and Peterborough Independent Economic Review (CPIER) Interim Report (May 2018), the Cambridge and Peterborough Local Industrial Strategy (July 2019), and Iceni's Greater Cambridge Employment and Economic Needs Study (2020).

2.2.2 Paragraph 2.2 of the Greater Cambridge Employment and Economic Needs Study states:

> *"This analysis also aims to assess the Greater Cambridge market within its geographical and commercial context of neighbouring local authorities as part of the defined Functional Economic Market Area (FEMA). The six local authorities within the FEMA include:*
>
> - *Cambridge City Council*

- *East Cambridgeshire District Council*
- *Fenland District Council*
- *Huntingdonshire District Council*
- *Peterborough City Council*
- *South Cambridgeshire Council."*

2.2.3 It is noted that Savills also agree the CPCA geography represents the best fit FEMA within Paragraph 3.2.5 and Figure 3.1 of their Market Assessment (May 2026), produced in support of Outline Planning Application 26/02534/OUT, which relates to Land North of A3107 Bar Hill (Slate Hall Farm) or Cambridge25.

2.2.4 The Cambridge and Peterborough Local Industrial Strategy notes how this CPCA-wide FEMA can be divided into three distinct sub-economies:

> *"Cambridgeshire and Peterborough is comprised of three different subeconomies – Greater Cambridge, Greater Peterborough and The Fens. Each is unique, facing its own opportunities and challenges. Success for business in each will take a different form, while the overall goal – an inclusive, prosperous, and productive economy – is the same. To achieve this, many different sectors will need to flourish, creating opportunities for entrepreneurs and employees."*

2.2.5 The 'Review of Economic Data, Context and Representations', prepared by Iceni Projects and released as part of the Regulation 19 consultation (REDCR 2026), states that the Employment and Housing Needs Study (2025), which has informed the allocation of 317,000 sqm of industrial and logistics floorspace in the emerging Local Plan, is based upon the needs of Cambridge City and South Cambridgeshire only (Paragraph 5.6). The Greater Cambridge geography is not the FEMA for strategic logistics, but rather reflects one of the less extensive subeconomies highlighted by the Industrial Strategy. Consequently, the evidence base only reflects a specific, more localised segment of logistics need. This is highlighted on Page 12 of Iceni's 'Greater Cambridge Employment and Housing Evidence Update' (January 2023), which states that 'big box' unit occupiers tend to have a sub-regional level of search that extends beyond Greater Cambridge.

2.2.6 Similarly, Greater Cambridge's Draft Statement of Common Ground contains a draft Supplementary Statement of Common Ground focussed upon Meeting Sub-Regional Logistics Needs, coded as SoCG(i). This reaffirms the position that the 317,000 sqm of industrial and logistics floorspace within the GCLP reflects local floorspace requirements only. The SoCG(i) states that *"the wider needs for warehousing and logistics serving national or regional markets cannot be identified for the Greater Cambridge geography in isolation in a way that would meet Planning Practice Guidance Paragraph 031".* It goes on to state that sub-regional and regional floorspace needs have not been considered as part of the GCLP, contending that these floorspace requirements will be addressed as part of an emerging Cambridgeshire and Peterborough SDS, which the CPCA states will commence preparation later this year.

2.2.7 The approach to the emerging GCLP is fundamentally out of step with the PPG, as described above. The starting point must be to calculate need across the appropriate FEMA (i.e. the CPCA or SDS geography). The guidance in the PPG around calculating the need for logistics (Paragraph 031 Reference ID: 2a-031-20190722) then goes on to require local planning authorities to undertake a thorough analysis of market signals and economic forecasts to inform employment floorspace requirements, which we consider in detail below.

2.3 Key market Signals

2.3.1 In addition to the PPG, Paragraph 32 of the 2024 NPPF also emphasises the importance of responding to market signals in the plan-making process:

> *"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."*

2.3.2 The analysis of market signals should include evidence of market demand; the availability, loss and take up of existing stock; and take-up of space. This allows comparisons to be drawn between available supply and particular requirements so that 'gaps' in employment land provision can be identified. These aspects are considered below.

High Demand for Modern, Strategic-Scale Units

2.3.3 Strategic-scale units (i.e. those above >100,000 sq. ft) are driving the UK economy. Recent publications, such as Savills' and the UK Warehousing Association's (UKWA's) 'The Size and Make-up of the UK Warehousing Sector' (2024) and Knight Frank's 'Future Gazing: What's In The Box?' (2026) demonstrate how logistics units are getting progressively larger. This is for the following operational reasons:

- ***Maximising Storage*:** Optimising haunch height allows for increased vertical storage, enabling more pallets to fit within a smaller footprint and vehicle entry clearance;
- ***Cost Efficiency***: Efficient design reduces operational costs by minimising unnecessary space and lowering rental expenses;
- ***Improved Workflow***: A well-planned layout enhances productivity by facilitating quicker access to goods and streamlined operations;
- ***Future Flexibility***: Efficient use of space allows for adaptability to changing inventory needs without costly renovations (e.g. demand volatility at peak times such as Black Friday and dealing with free returns and next day delivery);
- ***Safety Compliance***: Proper stacking and height management reduce the risk of accidents and ensures adherence to safety regulations;
- ***Sustainability***: Optimising space contributes to sustainability by reducing the need for excess materials and energy use.

2.3.4 Consequently, sizeable floorplates and adequate eaves heights are key market requirements, allowing the full volumetric space of the unit to be utilised. These characteristics are essential to ensure properties are successfully let and do not become obsolete over a short period of time. Importantly, new logistics development is unlikely to attract finance if it doesn't meet these minimum specifications that the majority of businesses consider an essential perquisite for their operations to be undertaken efficiently.

2.3.5 A letter from Bidwells, who are leading market agents in Cambridgeshire, is contained in Appendix 4. This confirms there are unsatisfied requirements for units >100,000 sq. ft totalling 10.5 million sq. ft within the regional market. This pent-up demand is the result of a legacy of restrictive policies stretching back over two decades, as described in Section 2 of Stantec's 'Economic Need and Benefits Statement' (January 2026) (Appended to Appendix 3). Under South Cambridge's Adopted Policy (2018 Local

Plan) E/11, concerningly the long list of large market requirements listed in Bidwells' letter cannot be realised.

2.3.6 Savill's Market Assessment for Outline Planning Application 26/02534/OUT demonstrates how local businesses within Greater Cambridge and the wider Cambridgeshire area already occupy premises in excess of 100,000 sq. ft. As such, some of these requirements are from occupiers already located within Cambridge who cannot realise their expansion plans and are being forced to consider sites elsewhere, taking with them highly skilled jobs and economic opportunity. Marshalls Land Systems, for example, are one such company who have struggled to find modern larger premises in Greater Cambridge.

2.3.7 Bidwells' Letter also confirms the UK's average unit size in 2025 was 239,000 sq. ft. For Greater Cambridge to continue to impose size restrictions that sit well below this 'average' unit size, demonstrates a lack of understanding of the needs of the logistics sector: harming efficiency and competitiveness. This will have knock on impacts for those key growth sectors that rely upon the logistics sector for supply chain efficiency.

Limited Supply

2.3.8 In light of the above, vacancy rates have been falling across both the wider regional market, and the Greater Cambridge market in particular, with supply levels in logistics being some of the lowest in the last 10 years: starving business and the local economy of essential growth. Figure 3-1 of Stantec's 'Economic Need and Benefits Statement' shows recent sharp decreases in vacancy from the latter half of 2024. It now sits significantly below the widely accepted healthy market equilibrium level of 7.5%.

2.3.9 Bidwells' letter contained in Appendix 4 reinforces the above, stating that recent take-up in the area has diminished supply to levels which cannot support the current or future economic and population growth (which is particularly problematic in the context of the Government's/Mayor's more ambitious growth targets for up to 150,000 new homes across Greater Cambridge). As of July 2026, there are only two sites (The Land North of A141 between the Racecourse and A1307 in Huntingdon and Lancaster Way, Ely) with outline planning consent for both B2 and B8 uses currently available within a c.20-mile radius of Cambridge, for occupiers seeking space of more than 100,000 sq. ft. Moreover, there are only four existing units larger than 100,000 sq. ft currently available in Cambridgeshire. Two of these are now under offer, leaving only approximately 640,000 sq. ft available across two buildings, both located in Peterborough. Only one of these is a Grade A (a best-in-class & modern) unit.

2.3.10 Whilst the limited supply of large units is insufficient in quantitative terms, in terms of quality and sustainability, the second-hand supply (Grade B, C, etc) does not meet the needs of modern occupiers. That situation is only going to get worse through the imposition of stringent Minimum Energy Efficiency Standards (MEES), that will render a greater number of existing units functionally obsolete by 2030, creating even greater pressure for new stock.

2.3.11 A total of approximately 1.3 million sq. ft of occupied employment land in Cambridge City is allocated for residential development in the Cambridge Local Plan 2018, with further sites, such as Dales Manor and Unity Campus in Sawston (Greater Cambridge), also allocated for alternative uses. Displacement of commercial occupiers has already begun, with 94,000 sq. ft of industrial land being repurposed for residential or other uses, and a further 333,000 sq. ft set to be redeveloped in the next two to three years.

2.3.12 Resultantly, there are extremely limited opportunities along the A14 corridor for sites which benefit from direct access to the Strategic Road Network and this is particularly acute around Cambridge. The majority of take-up of larger units has been for build-to-suit opportunities. This demand for build-to-suit premises has direct implications for the demand for land, as larger buildings require bigger plots of land to accommodate them.

A standard building site coverage is around 40% per plot. However, it is worth noting that this is conservative figure, with many modern occupiers requiring significantly lower site coverage than this (25-30%). On that basis, to accommodate the next 15 years of demand, further significant allocations of land will be needed.

2.3.13 We note that Savills' Market Assessment (May 2026) for Outline Planning Application 26/02534/OUT acknowledges that the strategic-scale units proposed as a part of that scheme will provide a contribution towards addressing acute logistics floorspace requirements in Greater Cambridge, but will not resolve the long-standing supply and demand issues within the Greater Cambridge market in isolation. Paragraph 3.1.3 sets out the key findings, which are as follows:

- *Greater Cambridge's I&L market has been supply-constrained for a considerable period, which has supressed demand. Without suitable available premises, occupiers' demand is unable to be realised. Existing and prospective occupiers are unable to find space and their demand effectively disappears. Existing occupiers are either forced to remain in sub-optimal accommodation or leave the area.*
- *The market is particularly supply constrained for large units where the availability rate is just 1.9% and also in relation specifically to logistics uses, which represent less than half the level of total leasing activity in Greater Cambridge, compared to the amount seen across the FEMA.*
- *There is also a critical shortage of high-quality space to meet the needs of the I&L sector, with the majority of availability being across secondary and poor quality units which are not suitable to meet a significant proportion of demand.*
- *Greater Cambridge's historic supply and demand dynamics have been impacted by a longstanding lack of supply. This has limited leasing activity, especially in the logistics sector. In the wider FEMA, the market is more dynamic, although also highly constrained. The leasing market shows that the proportion of transactions for larger premises in Greater Cambridge is less than a third of that of the FEMA.*
- *There is only 2.6 years' worth of immediately available I&L supply. The picture is even more stark for good quality stock, with as little as 0.3 years of supply.*
- *Rental growth has strongly outperformed the rate of inflation over the 2012-2025 period in Greater Cambridge which puts pressure on local companies, particularly SMEs.*
- *Units are generally small and of average, or below average, quality. The poor quality of stock is a significant risk to its future suitability to meet occupier demand. About 78% of its stock in its current condition will not be fit for occupancy after 2030.*
- *When compared to the FEMA, Greater Cambridge has less than half the I&L provision per resident. This demonstrates the highly constrained nature of its market.*
- *Greater Cambridge has a disproportionately low number of I&L lease transactions. This reflects the lack of new supply to the market. Over the past 10 years, its logistics sector, the fastest growing segment of the I&L market, has been uniquely constrained. Whilst Greater Cambridge has about 16% of I&L inventory in the FEMA, it has only 5% of leasing activity in the logistics sector. Not only is Greater Cambridge underrepresented in logistics transactions for large units, which is expected, but the restrictive policy framework has also limited activity in the smaller unit categories.*

- *The restrictive planning policy environment has distorted the market in Greater Cambridge and has led to a longstanding critical shortage of land and buildings for I&L businesses, particularly those requiring larger premises and/or logistics use.*

2.3.14 These findings are consistent with those raised by Newlands and other logistics developers within their representations to the Regulation 18 Plan. It provides clear evidence of the acute shortages of strategic-scale logistics floorspace in Greater Cambridge. With the PPG (Paragraph 031 Reference ID: 2a-031-20190722) encouraging engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, we call for this engagement around market signals to be acted upon rather than ignored by the Greater Cambridge Authorities in the formulation of its policies/spatial strategy.

2.3.15 The GCLP's approach to accommodating logistics floorspace is inadequate in respect of the PPG and NPPF Paragraph 32 around consideration of market signals. This is acknowledged within the Councils' response to comments received from logistics developers (including Newlands) during the Regulation 18 consultation regarding Draft Policies S/JH and J/NE. Relevant and up-to-date evidence and market signals have been disregarded in the consideration of industrial and logistics floorspace needs over the Plan period. Appendix 12 (Response to Representations: Jobs) of the Consultation Statement for the Regulation 18 Stage states:

> *"Iceni Projects for the Councils completed a Review of economic data, context and representations 2026 (REDCR 2026) to consider whether the most likely employment forecast identified in the Employment and Housing Need Update 2025 (EHNU 2025) for the draft plan remains robust for the Proposed Submission Plan. The focus of the Local Plan evidence has been (sic). Having considered in detail datasets on sector by sector performance, Iceni's scenarios are considered realistic and embedded in past trends of known change, including periods of strong growth, but also taking into account periods of cyclical slow down – as being experienced at present. The Cambridgeshire and Peterborough Local Growth Plan and MCHLG Oxford Economics work cited by many respondents are noted. Their baseline outlooks provide useful reference points for the data review described above; their aspirational scenarios have been discounted for the purposes of Local Plan making evidence which is an exercise focused on wholly evidencable historical sector and economy wide data. In summary, the most likely forecast for jobs for the plan period identified at draft plan stage remains robust for the Proposed Submission Plan.*
>
> *The REDCR 2026 also considered representations regarding industrial and warehousing land needs. The requirement for the industrial and warehousing space (317,000 sqm, rising from 200,000 sqm in previous work) has been developed considering a range of factors which are compliant with the Government's planning practice guidance and take a very positive approach to industrial needs. The finer grain interpretation of specific technical adjustments raised in a number of comments is a matter of professional judgement. In summary, the industrial and warehousing employment land need for the plan period identified at draft plan stage remains robust for the Proposed Submission Plan."*

2.3.16 In planning for logistics, the PPG requires neighbouring authorities to work collaboratively to identify the scale of need across the FEMA. We consider the degree to which this has occurred effectively below.

2.4 Collaboration with Neighbouring Authorities

2.4.1 Paragraph 11(b) of the 2024 NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless the application of policies that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area, or if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole. Paragraph 27(b) reinforces this, with Paragraph 28 highlighting Statements of Common Ground (SoCG) are the appropriate mechanism for documenting cross boundary matters.

2.4.2 Within the Consultation Statement (Appendix 12: Response to Representations: Jobs) the Joint Authorities provided a response to comments received from developers to Draft Policy J/NE at the Regulation 18 stage, which called for the assessment of strategic need to be undertaken now to inform the GCLP. The response states:

> *"The concern over the restrictions on large-scale of warehousing and distribution is acknowledged. It is considered that warehousing and distribution facilities serving national or regional markets are best addressed at the sub-regional level. The councils have developed a Statement of Common Ground with the Cambridgeshire & Peterborough Combined Authority, neighbouring authorities within and neighbouring the functional economic area in which Greater Cambridge sits which confirms the need to assess the need for strategic warehousing facilities serving national or regional markets across the functional economic market area (FEMA) that includes but goes beyond Greater Cambridge, working in collaboration with authorities within and authorities neighbouring the FEMA. In principle, the Cambridgeshire & Peterborough Combined Authority Spatial Development Strategy (SDS) is considered to be the appropriate planning process by which to determine the need for warehousing and logistics serving national or regional markets. Preparation of the SDS will commence in 2026 and the CPCA intends to progress it at pace. Subject to confirmation of the scope of SDS's by Government, the SDS therefore provides a credible prospect that a long-term solution to the need for warehousing and logistics serving national or regional markets will be identified in the foreseeable future."*

2.4.3 The Regulation 19 consultation is accompanied by the following literature, which details the collaboration undertaken with neighbouring local authorities and key stakeholders:

- Draft Statement of Common Ground;
- Draft Statement of Compliance;
- Draft Supplementary Statements of Common Ground;
- Statement of Consultation;
- Statement of Community Involvement; and
- Greater Cambridge Authority Monitoring Report

2.4.4 The Draft Statement of Common Ground contains a draft Supplementary Statement of Common Ground focussed upon Meeting Sub-Regional Logistics Needs, coded as SoCG(i). SoCG(i) reaffirms that the proposed allocation of 317,000 sqm of industrial and logistics floorspace (Use Classes B2 and B8) within the GCLP reflects local floorspace requirements only. It states that the wider needs for warehousing and logistics serving national or regional markets cannot be identified for the Greater Cambridge geography in isolation in a way that would meet PPG (Paragraph 031

Reference ID: 2a-031-20190722) and that these floorspace requirements will be addressed as part of the forthcoming Cambridgeshire and Peterborough SDS. It states on Page 5 of the SOCG(i) that the following parties have been provided the opportunity to review and comment on the accuracy of the draft Statement of Common Ground upon the publication of the Proposed Submission Plan and will be invited to sign a supplementary Agreement SoGC (i) at submission stage:

- Cambridge & Peterborough Combined Authority
- East Cambridgeshire District Council
- Huntingdonshire District Council
- North Hertfordshire District Council
- West Suffolk Council
- Fenland District Council
- Peterborough City Council
- Bedford Borough Council

2.4.5 The lack of detail is in stark contrast to other best practice examples of joint working to calculate and apportion strategic warehousing need. Notably, Leicester & Leicestershire (8 Authorities) entered into a SoCG (March 2026) with a commitment to "cooperating on strategic cross boundary matters including agreeing the distribution of large warehousing need". A copy of the Leicester & Leicestershire SoCG is provided as Appendix 6. In this instance strategic warehousing facilities are defined as those units with floorspace equal to or greater than 9,000 sq. m in total. To determine need up to 2046, the 8 Authorities collaborated to prepare the 'Leicester & Leicestershire: Strategic Distribution Floorspace Needs Update and Apportionment (Oct 2025) to determine an overall need, which as highlighted at Table 2 of the Leicester & Leicestershire SoCG is apportioned to each authority. This was in-spite of the authorities plan preparation being at different stages (Para 4.10).

2.4.6 This is not unique, or indeed new. The Coventry, Warwickshire and Hinckley & Bosworth Authorities entered into a Memorandum of Understanding in July 2016 to ensure that "the employment needs of Coventry and Warwickshire are met in full including addressing an identified shortfall of employment land provision arising in Coventry" (see Appendix 7). This approach was undertaken to prevent a shortfall of 241 hectares of employment land, redistributing from Coventry to the Warwickshire Authorities. The redistribution was informed by commuter flows, market signals, levels of unemployment, regeneration, and housing distribution.

2.4.7 GCLP's approach to postponing the assessment of strategic need for logistics uses to the SDS is not aligned with the PPG or NPPF. We highlighted in Chapter 7 (Paragraphs 7.3.25 & 7.2.36) of our Regulation 18 representations (Appendix 2) that the examination of the West Suffolk Local Plan provides a directly relevant precedent.

2.4.8 West Suffolk's submitted Plan (January 2024) took a very similar approach to that now proposed through Draft Policy J/NE: it deferred the question of strategic logistics to a future sub-regional exercise and restricted storage and distribution proposals exceeding 9,000 sq m. The Inspectors' Report (1 July 2025) found that restriction was not justified. Indeed, the Inspector recommended its deletion from Policy SP12, together with the removal of equivalent restrictions on unit sizes from site allocation Policies AP15, AP16, AP19 and AP38 (MM81, MM82, MM85 and MM104).

2.4.9 Crucially, in the case of West Suffolk, the Council's Employment Land Review Update (September 2024) had already quantified a discrete requirement of 35 hectares for sub-regional strategic distribution, over and above 51 hectares of local need. This was then embedded within the Plan's 86-hectare employment land requirement (Paragraphs 52–55 and MM43).

2.4.10 The West Suffolk example therefore demonstrates two things. First, a local plan can and should quantify strategic logistics need within its own requirement, notwithstanding an intention to pursue a sub-regional approach in the longer term. Second, a policy restricting strategic-scale logistics pending that sub-regional exercise will not be found justified. This sets a clear precedent that the matter should be tackled now, through the GCLP, rather than deferred to the SDS.

2.4.11 The issue faced by GCLP is that the requisite collaboration between neighbouring authorities to identify the scale and apportionment of strategic logistics need across the FEMA has not taken place.

2.4.12 By contrast, there is clear evidence elsewhere of local authorities working together to deliver on cross boundary needs prior to the preparation of an SDS. GCLP should follow a similar approach. This is even more pertinent in light of potential delays to Local Government Reorganisation (LGR) announced in September 2026.

2.4.13 Other Authorities have taken a more positive/pro-active approach to addressing issues that may be covered in a future SDS, within their own Local Plans. It is noted that Paragraphs 1.17 – 1.18 of the North Northamptonshire Emerging Local Plan Scoping Consultation Document (May 2026) states:

> *"At the time of producing this consultation document there is no definitive information available on the geography or scope of a Spatial Development Strategy (SDS) for North Northamptonshire. However, in a consultation between 12th February and 26th March 2026 on the areas for producing spatial development strategies, the Government has stated that North Northamptonshire is one of the areas where no SDS has been proposed but it was wishing to hear proposals for appropriate SDS geographies for this (and other areas) where no SDS had been proposed.*
>
> *To ensure timely progress with preparing the Local Plan it is necessary to progress it in advance of the preparation of any (if any) SDS. <u>As a consequence, the Plan will need to address some issues that may be covered in a future SDS</u>. The evidence base for the Local Plan, alongside ongoing cross-boundary discussions, have not identified a requirement for this plan to take unmet development needs from adjoining areas…"* (our emphasis)

2.4.14 The North Northamptonshire Housing & Economic Needs Assessment Update (April 2026) produced as part of the evidence base for the emerging North Northamptonshire Local Plan (also prepared by Iceni Projects), specifically separates out the local need for industrial use and non-strategic warehousing (368,400 sq. m) at Para 16.17 from the need for strategic units (2.2 million sq. m) at Para 16.19. This approach is in stark contrast to that taken by the Greater Cambridge Authorities. Given North Northamptonshire shares a similar geographic context, straddling the A14, it first raises the question why such an approach has not been adopted in preparing the GCLP; but second provides a clear example of positive local plan preparation that chimes with Paragraph 36 of the 2024 NPPF and the tests of soundness on this subject.

2.4.15 This approach has not been replicated in the preparation of the GCLP, meaning it is not 'positively prepared'. It seeks to defer planning for any regional/national scale warehousing/logistics units despite compelling market evidence of an acute and immediate need. Therefore, Greater Cambridge's full objectively assessed needs are not captured in the GCLP.

2.5 Shortcomings of Current GCLP Approach

2.5.1 At Regulation 18 stage, Policy J/NE expressly sought to prohibit strategic-scale logistics units within Greater Cambridge. This resistance to accommodating large-scale development, which focused on national and regional distribution, was elaborated upon at Paragraph 3.42 of the Greater Cambridge Local Plan Topic Paper 6: Jobs (2025), released as part of the Regulation 18 consultation:

> *"Whilst we need to meet the needs for local distribution, as a central location, the area is also desirable to large scale national and regional distributors. Given the very high land take of this type of use, the local pressures on land supply for a range of uses including specialist sectors, and that the area includes the Green Belt, it is proposed that the Plan states that it will not support regional and national distribution proposals, continuing the approach included in the adopted South Cambridgeshire Local Plan 2018."*

2.5.2 Given the significant demand in Cambridgeshire, and the evident need for larger units, it is unsurprising that the representations prepared by logistics developers to the Regulation 18 consultation were universal in their opposition to the proposed wording of Policy J/NE, as summarised in Appendix 12 (Response to Representations: Jobs) of the Council's Consultation Statement below:

> *"Responses were received from developers objecting stating that the policy imposes disproportionate constraints on warehousing and distribution uses and limits the Plan's ability to meet identified economic needs and provide a flexible supply of employment land that can respond effectively to changing economic and employment floorspace requirements. It was considered to be inconsistent with the current NPPF, Planning Policy Guidance, the direction of travel in the draft new NPPF, recent appeal decisions and market conditions and therefore it is considered to be unsound. There was an objection and a request from West Suffolk Council to work collaboratively to identify and address wider needs for large scale strategic logistics provision and data centres and a request for sufficient flexibility to respond effectively to changing industrial and commercial needs over time from Cambridge Ahead*."

2.5.3 In an attempt to address the evident soundness issues associated with Policy J/NE, the Regulation 19 Plan has amended the policy to remove the prohibition of strategic-scale units, subject to applicants demonstrating that there is an unmet need for warehousing and distribution facilities providing for national or regional needs. The updated Jobs Topic Paper (2026), released as part of the Regulation 19 consultation, states that this policy amendment has been introduced to ensure that local (Greater Cambridge) warehousing and distribution needs are prioritised, over and above regional and national requirements, which will be accommodated for within the Cambridgeshire and Peterborough SDS in due course. The Topic Paper states:

> *"Recognising the requirements of national planning policy and guidance, Local Plan policy J/NE has been altered so that Proposals for large scale warehousing and distribution facilities providing for national or regional needs will not be permitted unless it can be demonstrated that: there is an unmet need for such facilities that must and can be appropriately provided within Greater Cambridge having regard to other policies and priorities within and arising from the Local plan; a proposal will not impede delivery of warehousing and distribution and industrial space that meets local market needs in market sector priority locations. The supporting text to the policy provides an example of what "appropriately provided" can mean - that the development does not generate traffic movements*

that impede the delivery of the wider development strategy. It also highlights that market sector priority locations are identified in the Greater Cambridge Warehouse and Industrial Space Needs Study (March 2025).”

2.5.4 Postponing the calculation of strategic need to be dealt with through the SDS is considered unsound for the following reasons:

1) The SoCG(i) states that the scope and function of SDSs is, at the time of writing, uncertain and yet to be confirmed by Government. It is our understanding that SDSs will not allocate strategic sites, but rather identify broad areas of opportunity that provide a framework within which future Local Plans can allocate strategic sites. As such, not addressing the strategic need through the emerging GCLP now is concerning as the immediate requirements for strategic-scale units, such as those identified within Bidwells’ letter, will continue to sit unsatisfied. The Local Plan will not be effective in the context of Paragraph 36 of 2024 NPPF as the objectively assessed needs of Greater Cambridge will not have been addressed. This approach is not aligned with Paragraphs 85-87 of the 2024 NPPF.

2) The timeframes for the preparation and adoption of an SDS are currently unknown. If the Cambridgeshire and Peterborough SDS commences preparation in 2026 and is adopted within 30 months, in line with the timeframes associated with the new plan-making process, then an SDS should be adopted by late 2029 at the very earliest. However, it is understood that the SDS may not commence preparation until 2027, which may push adoption even further into the future. Then beyond this, we would be relying upon the next iteration of the GCLP to allocate strategic sites within the areas of opportunity identified in the SDS. It would be reasonable to assume a further 30 months, which would extend into 2032/2033. This is a very significant timeframe where a key growth sector is not being accounted for from a plan-making perspective: extending the damaging ongoing hiatus or policy lacuna for strategic logistics.

3) The Government’s withdrawal of its proposed restructuring of local government in many locations may have a profound impact upon the implementation of SDSs nationwide: introducing a heightened degree of uncertainty. For instance, Greater Cambridge’s SoCG(i) states that West Suffolk lies within the confirmed Norfolk and Suffolk SDS geography, yet following the withdrawal of LGR in Norfolk and Suffolk, there is no certainty that West Suffolk, an important neighbouring authority, would be considered as part of an SDS. This would undermine Policy SP22(d) of the West Suffolk Local Plan, which requires that a sub-regional approach to site identification for regionally and nationally significant logistics provision will be undertaken.

4) The SoCG(i) is dependent upon neighbouring authorities agreeing to this approach. Given the potential geographical discrepancies that may exclude key authorities like West Suffolk, combined with the failure of some local authorities to engage with the GCLP to date (e.g. Braintree District Council), there is no guarantee that all of the proposed signatories will agree to SoCG(i). Indeed, other proposed signatories have adopted alternative approaches to addressing logistics floorspace need within their jurisdictions. For instance, Huntingdonshire District Council have proposed three strategic employment allocations within their Regulation 19 Local Plan, totalling 456,000 sqm (note there is no reference to these contributing to Greater Cambridge’s unmet needs), while Peterborough City Council’s Members are currently debating whether the one strategic-scale employment is deleted from their emerging Local Plan (Policy LP61.5 and Policy LP62) in favour of an early review mechanism to address the resulting unmet need. While the soundness of these approaches is not considered in these

Representations, the lack of consistency across the neighbouring local authority areas in addressing the issue of strategic-scale logistics floorspace adds to the uncertainty that the signatories will agree to SoCG(i).

2.5.5 In the interim period, the SoCG(i) states that warehousing and logistics facilities serving national or regional markets could come forward via the revised iteration of Policy J/NE contained within the Proposed Submission Plan. This seeks to ensure this does not prejudice the delivery of local warehousing and distribution needs, whilst having regard to other policies and priorities within the GCLP. SoCG(i) stipulates that demand for logistics floorspace, ahead of the SDS, will be assuaged through a very significant supply of land for such facilities in Cambridgeshire and Peterborough, and the A14 Corridor, secured through unspecified permissions and draft allocations, as stated within the table below:

Breakdown	Cambridgeshire and Peterborough: Total B2/B8 floorspace (m2 GIA)	A14 corridor: Total B2/B8 floorspace (m2 GIA)
Estimated total	1,034,543	523,950
Estimated permitted floorspace	544,400	224,307
Estimated allocated floorspace	221,813	183,313
Estimated draft allocated floorspace	777,093	305,000

Figure 1: Table from SoCG(i) demonstrating the perceived current availability of B2/B8 floorspace in Cambridgeshire and Peterborough, and the A14 Corridor.

2.5.6 There are a number of issues with the above approach as follows:

1) The origins of the figures referenced in the above table are not specified, so little reliance can be placed on them as an accurate snapshot of permitted and allocated B2/B8 floorspace. The Market Assessment prepared by Savills to support Outline Planning Application 26/02534/OUT contains an assessment of permitted and allocated/draft allocated land supply for Use Class Eg(iii), B2 or B8 floorspace in Greater Cambridge. The Assessment concluded that land that could support approximately 88,475sqm of floorspace benefits from planning permission as of March 2025, though this figure does not account for qualitative issues associated with the suitability of these sites to accommodate strategic-scale logistics floorspace. Table 4.1 and Paragraph 5.3.2 of Savills Assessment identifies that 25,500 sq. m of that is part of the Genome Campus, restricted by planning condition to those uses associated with genomics and bioinformatics data storage; and that land at Cambridge Research Park (16,032 sq. m) and Waterbeach (17,400 sq. m) is likely to come forward for R&D/Offices. That only leaves Northstowe (21,525 sq. m) and Accelerator Park (8,018 sq. m) as having potential for B8 of any scale. Given the scale and location of these allocations, we do not believe they are appropriate to accommodate units over 100,000 sq. ft.

   Stantec's analysis of supply, which is set out in Table 4-4 of the 'The Economic Needs and Benefit Statement (January 2026) that accompanied representations to the GCLP Regulation 18 consultation, challenges the supply position further. This highlighted that only 4,518 sq. m at Anderston Road could be considered to

likely come forward for B2/B8 uses. This adds to the unreliability of the figures provided above;

2) SoCG(i) states at Paragraph 12 that "emerging local plans in the area provide a positive approach in responding to evidenced needs for warehousing and logistics, including for warehousing and logistics facilities serving national or regional markets where a need has been identified". It suggests that in the short term (i.e. before an SDS is produced) there is a 'very significant' supply of land for such facilities through permissions and draft allocations. The evidence presented by Savills and Stantec suggests quite the opposite in Greater Cambridge, and there is no evidence within other emerging Local Plans to suggest Greater Cambridge's unmet strategic need is accounted for; and

3) The table does not provide any detail regarding the sites that contribute towards the figures, whether they fall within the CPCA geography and whether they are suitable for accommodating strategic-scale logistics floorspace. As specified within Paragraph 87 of the 2024 NPPF and the PPG, the logistics industry has distinct locational and spatial requirements, such as unfettered access to the strategic road network and a suitable pool of labour. It cannot be assumed that all permitted, allocated and draft allocated employment floorspace within Cambridgeshire and Peterborough, and the A14 Corridor, is capable of accommodating storage and distribution operations at a variety of scales and in suitably accessible locations.

2.5.7 While this amendment to Policy J/NE is a step in the right direction, requiring applicants to provide evidence to demonstrate that local warehousing requirements will not be impeded by a proposal for strategic-scale warehousing, means that it remains an unsound policy. This is because it continues to dismiss clear market signals.

2.6 Assessment of Soundness

2.6.1 At present, Draft Policy S/JH does not provide sites for strategic-scale logistics to meet clearly evidenced market needs and occupier requirements. We provide a summary table assessing these Draft Policies S/JH and J/NE against the 2024 NPPF's tests of soundness below.

NPPF TEST OF SOUNDNESS (PARAGRAPH 36)	**PERFORMANCE OF POLICIES S/JH and J/NE**
Positively Prepared	Policies S/JH and J/NE are not positively prepared. They do not ensure that Greater Cambridge's objectively assessed need is met, as a minimum, and they are not informed by agreements with other local authorities.
Justified	The justification for deferring consideration of strategic-scale logistics provision to the Cambridgeshire and Peterborough SDS is inherently unsound, as the scope, function and effectiveness of the SDS is fraught with uncertainty. The Plan's assertion that there is sufficient existing floorspace permitted and allocated in Greater Cambridgeshire to accommodate floorspace

	requirements in the interim period, before the SDS is adopted, is also unjustified and unevidenced. The justification for suppressing strategic-scale logistics developments unless need can be demonstrated as part of a planning application is unsound, as evidence of this need is already apparent, and should be planned for accordingly. Clear precedent has been set on this matter by the West Suffolk Local Plan Examination.
Effective	Policy S/JH is not effective, as it does not allocate any strategic-scale logistics sites to address immediate requirements. Policy J/NE is not effective, as it requires strategic-scale floorspace requirements to be evidenced by applicants, when the evidence is already unequivocal. If J/NE was to remain in its current form, the Council's will need to quantify the strategic need requirement for the Policy amendment to function properly. They would also need to do so when considering the pending and forthcoming planning applications along the A14 against policy S5 of the 2026 NPPF. Accordingly they should simply account for Strategic Need now as part of the GCLP to ensure it is effective. Effective joint working on strategic matters has not taken place and cross boundary matters have not been dealt with. This is despite there being strong markets signals, including high demand and acute supply-side shortages. Instead, the decision has been taken to defer these matters rather than deal with the immediate need now. This will have significant impacts on the competitiveness of the area and be felt by other key growth sectors that require supply chain support.
Consistent with National Policy	There has been a lack of co-operation/collaboration with neighbouring authorities meaning the approach is contrary to the section on 'Maintaining Effective Co-operation' in the 2024 NPPF (Paragraphs 24-28). The GCLP will not result in sustainable economic development in its current for; is not aspirational and has not been shaped by proportionate and effective engagement. As such, it is not aligned with 2024 NPPF Paragraph 16. The policies turn their back on market signals, so are not in line with NPPF Paragraph 32 and the PPG. The current approach means the GCLP will not capture wider opportunities for economic growth and productivity in line with 2024 NPPF Paragraph 85. Turning to NPPF Paragraph 86:

	• the approach has not had regard to the national industrial strategy that highlights the importance of freight and logistics. • It does not identify strategic sites for inward investment to meet needs over the plan period. • It has not had particular regard to facilitating development to meet the needs of the modern economy: specifically freight and logistics. Both policy approaches fundamentally fail to plan for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation, as required by NPPF Paragraph 87. As highlighted in previous sections, the guidance in the PPG entitled 'How can authorities assess need and allocate space for logistics?' (Paragraph 031 Reference ID: 2a-031-20190722) has not been followed.

2.6.2 The suggested approaches to address the unsoundness of these policies is explored in the following section.

3 LOGISTICS AND EMPLOYMENT NEEDS: THE SOLUTIONS TO THE KEY ISSUES

3.1 Introduction

3.1.1 The preceding section identified the evident soundness issues associated with Draft Policies S/JH and J/NE, in their proposed form. This section provides a series of solutions which would ensure that these policies could be found sound at Examination.

3.2 Solution 1: Holistic Calculation of Industrial & Logistics Floorspace Need (Local & Strategic)

3.2.1 At present, the 317,000sqm I&L floorspace requirement within the emerging Plan Period, as per Policy S/JH, is based upon Greater Cambridge's local warehousing needs only. To accord with Paragraph 36 of the 2024 NPPF, a more positive and proactive approach to addressing strategic-scale logistics floorspace requirements must be taken.

3.2.2 Given the scale of demand for strategic logistics floorspace in Greater Cambridge and the wider FEMA, that has arisen from suppressive planning policies over the past two decades (such as Policy E/11 of the adopted South Cambridgeshire Local Plan), additional sites must be allocated as part of the GCLP to address and accommodate these immediate requirements. Failure to do so would constitute a clear departure from Paragraph 36 of the NPPF, which requires local plans to deal with, and not defer, cross-boundary strategic matters, such as strategic-scale logistics floorspace demands.

3.2.3 Indeed, this appears to be an optimum time to undertake an assessment of strategic need in line with the PPG guidance on 'How can authorities assess need and allocate space for logistics?' (Paragraph 031 Reference ID: 2a-031-20190722) given the emerging local plans of key constituent authorities within the FEMA are at a similar stage (i.e. Regulation 19) and about to be submitted for Examination.

3.2.4 Regarding the calculation of Greater Cambridge's I&L floorspace requirements, the REDCR (2026) defends the net absorption methodology proposed by Iceni, stating that the adoption of alternative methods, such as an analysis of gross completions, is inappropriate. This is because it relies on gross trends that, in Iceni's view, would ignore the effects of on-site stock recycling which have and will continue to occur, particularly as aged stock needs to be renewed, which is one of the factors considered (Paragraph 5.4, REDCR 2026).

3.2.5 As demonstrated within Stantec's Economic Need & Benefits Statement (January 2026) submitted with Newlands' Regulation 18 representations, net absorption only captures the balance between new supply and take-up after accounting for losses, which can mask the true scale of market activity and demand. Where significant industrial land is being lost to competing uses, net absorption figures may appear artificially low or even negative, suggesting weak demand when there is continued interest and unmet need within the market.

3.2.6 By contrast, using gross completions provides a clearer and more accurate reflection of actual development activity and occupier demand for industrial space, independent of the rate of land loss. This approach ensures that the underlying requirement for industrial and logistics land is not understated in areas like Greater Cambridge, where redevelopment pressures are particularly strong and the supply of available industrial sites is being steadily eroded.

3.2.7 To dismiss this fundamental critique of the assessment methodology deployed in the calculation of Greater Cambridge's I&L floorspace needs on the basis of a difference

in professional opinion (as stated in the REDCR and the Councils' Consultation Statement) is inconsistent with Paragraph 85 of the NPPF. This requires Local Planning Authorities to adopt an approach to economic growth that builds on an area's strengths, counters any weaknesses and addresses the challenges of the future.

3.2.8 It is apparent that the net absorption methodology proposed within the Draft Plan should be revisited to ensure it can counter Greater Cambridge's considerable weaknesses in relation to the supply of strategic-scale logistics requirements, as summarised within the Market Assessment submitted with 26/02534/OUT. Failure to do so would result in the Local Plan departing from the UK's Modern Industrial Strategy (November 2025). This acknowledges the vital contribution that the freight and logistics industry makes to the UK economy, emphasising that the free movement of freight and goods is of paramount importance to the strength of the UK economy. Indeed, the BPF's Report 'Industrial and Logistics: The Infrastructure of Everything' (May 2026) confirms that the key growth sectors set out in the Government's Industrial Strategy combined, spend £250 billion annually on inputs from the I&L sector, which represents 22% of their overall inputs. The Cambridgeshire and Peterborough Local Growth Plan also acknowledges the critical role logistics plays as part of its economic ecosystem.

3.2.9 The Market Assessment also includes a review of the average levels of net absorption from 2014-2025 in Greater Cambridge. The review identified that net absorption (demand) has exceeded the average levels of net deliveries (supply) of I&L floorspace. Across the FEMA, demand has exceeded supply by 16% over the period 2012 to 2025. The Assessment notes that, in Greater Cambridge, the market's highly constrained state, with few new deliveries, has held back net absorption, while the level of market activity was very low, given the limited levels of stock.

3.2.10 The Assessment concludes that the 317,000sqm floorspace requirement should be treated as a minimum figure. As demonstrated within these Representations, and those submitted to the Regulation 18 consultation, the strategic I&L need position needs to be fundamentally reevaluated to ensure that the GCLP is positively prepared, effective and justified, and consistent with national policy, as required by Paragraph 36 of the 2024 NPPF.

3.2.11 Accordingly, Stantec have undertaken an assessment of strategic need in the accompanying 'Greater Cambridge Industrial and Strategic Needs Assessment' (September 2026) (Appendix 3). Unlike Iceni's assessment, which addresses local floorspace needs for Greater Cambridge in isolation, Stantec's Assessment complies with the PPG by objectively-assessing the logistics floorspace needs of the wider FEMA (i.e. the six local authorities that form part of the CPCA). This adopted the same timeframes as Iceni, with a ten-year 'look-back' period from 2014 to 2023 utilised to derive a floorspace requirement for the emerging GCLP period (2024-2045).

3.2.12 The Needs Assessment is based upon the 'suppressed demand model', advocated by The British Property Federation (BPF) (now RE:UK) and developed by Savills. This is recognised as an industry leading approach that calculates the extent to which the net take-up of floorspace (net absorption) has been suppressed by availability (supply) constraints.

3.2.13 Stantec's Needs Assessment echoed the findings of Iceni's Greater Cambridge Warehouse and Industrial Space Needs Report (2025), and the Market Assessment prepared to support Outline Planning Application 26/02534/OUT, regarding the regional market context:

- Less than 10% of the Combined Authority's strategic-scale industrial floorspace inventory is within Greater Cambridge, despite Greater Cambridge accommodating 34% of the population and 43% of jobs in the FEMA.

- Undersupply of strategic logistics floorspace is likely to have fuelled above-inflation commercial rental growth – at the end of the ten-year 'look-back' period, logistics rental growth had reached 1.52 times inflation.
- Vacancy rates across the FEMA averaged at 3.3%, which is significantly lower than benchmark for a functioning logistics market (7.5%).

3.2.14 The data and market evidence gathered from the ten-year look-back period (2014-2023) was used by Stantec to assess the scale of suppressed logistics floorspace demand in the FEMA. This process arrived at an actual demand figure of 89,927sqm for industrial and logistics floorspace per annum, over the course of the look-back period.

3.2.15 This FEMA-wide requirement was subsequently disaggregated to the Greater Cambridge scale. This apportionment was informed by the Valuation Office Agency's record of non-domestic rated property within Greater Cambridge, which comprises approximately 17% of the CPCA's total.

3.2.16 The apportionment of 17% of the Combined Authority's wider floorspace requirement to Greater Cambridge results in a minimum strategic-scale floorspace requirement of 312,000sqm over the emerging Plan Period: requiring 125ha of land based upon a 25% plot ratio.

3.2.17 In addition to strategic-scale floorspace requirements, Stantec's Needs Assessment also considers the floorspace requirements necessary to fulfil increasing levels of on-line expenditure by Greater Cambridge's population over the Plan Period. The Needs Assessment considers the rate of online expenditure across the CPCA's look-back period, before apportioning a commensurate floorspace requirement to Greater Cambridge of 80,000sqm over the Plan Period.

3.2.18 The Needs Assessment concludes that the GCLP must significantly uplift its objectively assessed floorspace requirements, as follows:

COMMERCIAL FLOORSPACE TYPOLOGY	**QUANTUM**
Local (Greater Cambridge only) Requirements	317,000sqm
Strategic Requirements (derived from a comprehensive PPG-Compliant assessment of the wider FEMA, apportioned to Greater Cambridge	312,000sqm
Strategic Online Expenditure Requirements	80,000sqm
TOTAL	**709,000sqm**

3.2.19 At present the cumulative total of the floorspace allocated specifically for B2/B8 use in the draft allocations of the Regulation 19 Plan is unclear. In order to try and quantify the amount of floorspace allocated, which is likely to come forward for B2/B8 purposes, we have created the table below:

Policy Reference	**Site**	**Proposed B2/B8 Floorspace (sq m)**

S/SHF	Land North of A1307 Bar Hill (Slate Hall Farm)	c.220,000
S/RRA/SCS	Land to the South of Cambridge Services, A14	c.90,000
S/RRA/BBP	Land at Buckingway Business Park, Swavesey	c.10,000
TOTAL		**c.320,000**

3.2.20 The table above identifies allocations where a stated B2/B8 quantum have been included. Mixed-use allocations where any B2/B8 component is not separately quantified have been excluded, as the Plan provides no basis to attribute a figure to them, meaning they cannot be relied upon. Such examples include Cambourne North (108,000 sqm of employment floorspace with no use split, delivered from 2034), Waterbeach New Town and Northstowe.

3.2.21 We have reservations over whether the 90,000 sqm attributed to Land to the south of Cambridge Services (Policy S/RRA/SCS) can be delivered. The site extends to 24.58 hectares, of which around 2.25 hectares is to be given over to lorry parking. Delivering 90,000 sqm on the remaining c.22.3 hectares would require a plot ratio of approximately 40%. That is roughly double the c.19% implied by the Plan's own allocation of 220,000 sqm across the 113.3-hectare Slate Hall Farm site, and is considered to leave limited room for appropriate landscaping, internal circulation and BNG.

3.2.22 The promoter's own Indicative Masterplan (Frank Shaw Architects for Jaynic, Drawing 20045-FSA-00-XX-DR-A-0120 Rev P03) submitted in support of it shows nine units totalling approximately 760,000 sq ft (c.70,600 sqm), of which 50,000 sq. ft. is shown as first floor offices. That is c.19,400 sqm (over 20%) less than the policy quantum, even before the detailed landscape, drainage and heritage requirements of the policy are tested.

3.2.23 Accounting for our concerns above over the Indicative Masterplan relating to site S/RRA/SCS, and including Newlands Park Cambridge as an allocation, the table below highlights that a total of circa 460,000 sqm of B2/B8 floorspace could come forward. This still represents a shortfall of circa 249,000 sqm, or only 65% of Stantec's 709,000 sqm calculation of objectively assessed need.

Policy Reference	**Site**	**Proposed B2/B8 Floorspace (sq m)**
S/SHF	Land North of A1307 Bar Hill (Slate Hall Farm)	c.220,000
S/RRA/SCS	Land to the South of Cambridge Services, A14	c.70,000
S/RRA/BBP	Land at Buckingway Business Park, Swavesey	c.10,000
	Newlands Park, Cambridge	C160,000
TOTAL		**c.460,000**

3.2.24 The strategic-floorspace requirements calculated by Stantec should be factored into the GCLP, to ensure that it remains positively prepared, consistent with national policy,

justified and effective. A failure to account for objectively assessed strategic-floorspace requirements, as undertaken within Stantec's Needs Assessment, will render the GCLP unsound at Examination.

3.2.25 Basing the GCLP upon local floorspace requirements only is in direct conflict with Paragraph 36 of the NPPF, which requires LPAs to deal with, and not defer, cross-boundary strategic issues, and the PPG, which requires LPAs to account for trends in take up and the availability of logistics land and floorspace across the relevant market geographies (Paragraph 031, Reference ID: 2a-031-20190722). Accounting for objectively assessed strategic floorspace requirements will also ensure that the GCLP is compliant with Paragraph 87 of the NPPF, which requires Local Plans to plan for storage and distribution uses at a variety of scales and in suitable accessible locations.

3.2.26 Importantly, to ensure cohesion with an amended Policy S/JH, Policy J/NE must also be amended to delete any restrictions upon the delivery of strategic-scale warehousing, to ensure it does not undermine the strategic floorspace requirements contained therein.

3.3 Solution 2: Identifying Optimal Locations to Accommodate Strategic Sites

3.3.1 If a holistic approach to addressing logistics needs is accommodated within the GCLP, as set out in the preceding section, then additional suitably located allocations to accommodate that requirement must be included.

3.3.2 Paragraph 87 of the NPPF 2024 states that Local Plans must make provision for:

> *"storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation*."

3.3.3 The PPG (Paragraph 031 Reference ID: 2a-031-20190722) also refers to what these locational requirements are:

> *"Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour."*

3.3.4 In accordance with Paragraph 87 and the PPG, sites in suitably accessibly locations must be sought to align with the locational requirements of strategic-scale logistics occupiers in Greater Cambridge, which are summarised as follows at Table 0.2 of the Greater Cambridge Warehouse and Industrial Space Needs report (2025): "*Strategic Road Network (SRN), with M11/A14 location preferred*".

3.3.5 Good access to the SRN enables operational efficiency and access to key markets, suppliers, customers and labour pools. Moreover, it enables these 24-hour uses to be located away from residential locations, which can help to reduce congestion and emissions, and improve air quality and public health.

3.3.6 Newlands Park Cambridge is extremely well connected to the SRN via A14 Junction 24. The A14 follows a broad east-west alignment across the East of England and Midlands: directly linking Ipswich and the Port of Felixstowe in the east to the M1/M6 interchange near Rugby in the west. This makes it essential for the movement of imported and exported goods across the country.

3.3.7 In 2023, these two ports collectively handled 24.9 million tonnes of freight representing 5.8% of all freight moved through UK Ports. Felixstowe alone accounted for 5.3% of total port freight, making it the seventh largest port in terms of freight volume handled. Incidentally, National Highways note the A14 carries around 85,000 vehicles per day.

26% of this is HGV traffic against the national average of 10%. As such, the A14 is a nationally significant freight corridor and is particularly significant given that, according to Department for Transport (DfT) statistics, 95% of the UK's international freight is transported by sea.

3.3.8 The importance of the A14 was recognised in the recently allowed appeal decision for storage and distribution uses at Thrapston in North Northamptonshire (Ref: APP/M2840/W/25/3362393). The Appeal Inspector stated:

> *"The A14 is a priority route for strategic logistics, and this is also emphasised in a number of Council documents. It was built specifically to link the port of Felixstowe to the national motorway network at the junction with the M1 and M6 and provide access to the Midlands and the North. It is essential for the movement of imported and exported goods across the country with Felixstowe accounting for 5.3% of all freight moved through UK ports in 2023. It also provides access to other key freight infrastructure, including the intermodal rail freight terminals at Felixstowe, Ely and Daventry. These connections allow logistics occupiers located along the A14 corridor to integrate rail freight into their supply chains, enabling the efficient movement of goods across the UK by rail.*
>
> *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. 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."*

3.3.9 Iceni's 'Greater Cambridge Warehouse and Industrial Space Needs: Final Report' aligns with the above. At Paragraph 5.18, it states the following in respect of the locational priorities for strategic distribution.

> "*Strategic distribution: Including third party logistics and retail distributors. Larger operators most particularly require strategic road network access of the M11 / A14 and close proximity to junctions. They also seek reasonable access, sub 30 minutes drive, to a labour force. Sites usually require large areas of flat land and good power supply."*

3.3.10 This approach needs to be applied by Greater Cambridge when selecting sites to accommodate the objectively-assessed strategic-scale floorspace requirements, with unfettered access to the A14 being an essential locational requirement, to ensure alignment with Paragraph 87 of the 2024 NPPF.

3.4 Solution 3: Allocation of Newlands Park Cambridge

3.4.1 With reference to Paragraph 87 of the 2024 NPPF, Solution 1 of this section seeks to ensure that the GCLP plans for storage and distribution uses 'at a variety of scales'. Solution 2 guides the GCLP to allocate sites to address strategic-scale floorspace requirements in 'suitably accessible locations'.

3.4.2 Newlands Park Cambridge is ideally positioned to accommodate a substantial part of the objectively-assessed local and strategic-scale floorspace requirement in Greater Cambridge, in full accordance with Paragraph 87.

3.4.3 Since Newlands' previous representations to the Regulation 18 version of the GCLP in January 2026, the proposals for Newlands Park Cambridge have evolved significantly, with the submission of an outline planning application due imminently, comprising the following description of development:

An outline planning application for storage and distribution floorspace (Use Class B8), with ancillary offices and gatehouses; Amenity Hub with ancillary offices (that could include retail unit(s), Café/Restaurant, Training Centre, Community Facility, Dance/Sports Hall (flexible floorspace within Use Classes E/ F.1/ F.2)); an HGV Parking area (Sui Generis Use) with ancillary amenity block; access infrastructure (including new and improved vehicular access from A14 Junction 24 southern roundabout (provided in detail), vehicular, pedestrian and cycle access, parking, and servicing provision); utilities (including a new electricity sub-station, gas, water, foul water treatment facility, telecommunications); sustainable drainage systems; landscaping, amenity space and maintenance compound; and all associated engineering works and infrastructure (including breaking-up of hardstanding and ground remodelling and enabling works). All matters reserved except for site access.

3.4.4 The planning application seeks to deliver up to 160,000sqm of modern high quality and sustainable logistics floorspace, thereby providing a significant contribution towards the total objectively assessed requirement of 709,000sqm over the Plan Period.

3.4.5 The key refinements to the proposals, introduced since January 2026 following continued engagement with key stakeholders and the local community, are summarised below:

- The proposals were presented to the Greater Cambridge Design Review Panel on 29 January 2026. The Panel made a series of recommendations which have been accommodated within the proposed design approach, including the incorporation of additional bus stops along the Primary Movement Corridor, to maximise connectivity.
- The planning application is supported by a robust Design Code, prepared to inform future reserved matters applications. The Code has been prepared in close partnership with Planning and Design Officers since Winter 2025, to ensure that the detailed design is governed by strong agreed principles.
- Continued pre-application engagement with Cambridgeshire County Council as Highway Authority and National Highways has been undertaken to agree the principle of the proposed access arrangements to the Site from the A14 J24 Southern Dumbbell Roundabout ahead of submission of the planning application, while a Stage 1 Road Safety Audit brief has been agreed.
- Continued pre-application engagement with the Environment Agency, Swavesey Parish Council and the Swavesey IDB regarding the proposed drainage strategy, and off-site drainage implications, principally in relation to the Webbs Hole Sluice. The proposed attenuation features have been designed to accommodate surface water on site in the event of a four-week closure of the Webbs Hole Sluice.
- Meetings have been held with Stagecoach to ascertain the potential for enhanced bus provision to the Site. Newlands are willing to provide financial contributions to operators like Stagecoach to provide additional bus capacity, alongside additional shuttle services committed to for a 5-year period that will link the development to nearby settlements and transport interchanges.

3.4.6 This engagement has been factored into the submitted planning application, which will be accompanied by a comprehensive Planning Statement which sets out the case in favour of Newlands Park Cambridge. The proposed benefits of the development, as stated in the Planning Statement, are outlined below:

Environmental Benefits

- **Benefit 1: Additional Tree Cover & Staff/Public Access to Amenity Areas**. There is proposed to be a significant increase in tree cover across the Site, achieving a minimum 18.53% canopy coverage, which could be enhanced further through future on-plot landscaping. Further, a substantial amenity area for the benefit of staff is proposed on the southern edge of the site, which will also be accessible to the public, who can park within the amenity hub.
- **Benefit 2: Biodiversity Net Gain**. The proposed development will bring significant enhancements by way of Biodiversity Net Gain, proposing up to an additional 64.37 area habitat biodiversity units, up to +22.03% gain in hedgerow units, and a +2.77 gain in watercourse units. This equates to a +25.74% net gain in habitat units, a +106.67% net gain in hedgerow units, and a +17.99% gain in watercourse units.
- **Benefit 3: High Quality Buildings**. The proposed development will be designed to achieve BREEAM Excellent and EPC A Ratings as a minimum, with a commitment to aspire to BREEAM Outstanding and EPC A+ wherever possible, demonstrating excellent sustainability credentials.
- **Benefit 4: Infrastructure Enhancement**. The proposed enhancements to cycle and footway links between the existing A14 cycle/footbridge and Boxworth village will provide a key local benefit that will help to enable active travel by non-car modes. The proposed enlargement of the A14 Junction 24 Southern Dumbbell roundabout will facilitate the site access and will deliver the additional benefit of addressing forecast capacity issues in the 2040 future year scenario.
- **Benefit 5: Public Transport & Bus Services**: The development will result in enhancements to local bus provision within the area, with additional shuttle services committed to for a 5 year period that will link the development to nearby settlements and transport interchanges.

Economic Benefits

- **Benefit 6: Addressing Unmet Storage and Distribution Needs**. As demonstrated with these Representations, it is apparent that the evidence base prepared to support the GCLP has underestimated market requirements for storage and distribution floorspace and that, once strategic-scale floorspace needs are accounted for, an additional 312,000sqm of floorspace should be allocated in the Plan, alongside 80,000sqm to account for projected growth in online retailing. Through the delivery of up to 160,000 sqm, Newlands Park Cambridge can provide a significant contribution to meeting the need for a sector recognised as critical infrastructure within the UK's Modern Industrial Strategy.
- **Benefit 7: Increased Business Rates**. The delivery of up to 160,000 sqm of commercial floorspace will deliver significant income for the Council through enhanced business rates, estimated at £5.2 million per annum.
- **Benefit 8: Supporting Cambridge's Knowledge-Economy**. The acceleration of Cambridge's knowledge-economy has resulted in the reduction of industrial employment land and buildings. The proposed development will help to address some of that loss, whilst providing space that is recognised as being crucial to supporting the UK's core growth sectors, such as Life Sciences & Technology. The British Property Federation's (BPF's) (now RE:UK) 'Infrastructure of Everything' Report (2026), highlights that the IS-8 sectors combined purchase £250 billion worth of inputs from the Industrial and Logistics

sector annually, representing 22% of their overall outputs. This highlights the importance of Industrial & Logistics in underpinning these key growth sectors, and thus the added benefit this will have to the wider Greater Cambridge economic ecosystem.

- **Benefit 9: HGV Parking**. The provision of 60 dedicated HGV parking bays will help to address a specific need for additional off-street HGV parking as a key objective for Greater Cambridge.

Social Benefits

- **Benefit 10: Employment Growth.** Analysis undertaken by CBRE in support of Newland's planning application identifies a pool of 11,900 potential workers (classified as 'elementary workers, returners and unemployed) that will be boosted by at least a further 2,989 workers from housing growth planned for in the Draft GCLP. The proposed development, once operational, will deliver significant local employment opportunities, estimated at 2,060 FTE. This is particularly pertinent in Greater Cambridge, where the focus of recent economic growth has centred on R&D/Life Sciences. By contrast, as noted by CBRE there are a potential 41,500 people in Greater Cambridge employed in declining sectors of manufacturing, retail and administration that would be most likely to consider warehousing work. The application therefore provides more alignment between the skills of the populace and the opportunities available.
- **Benefit 11: Local Employment & Skills Plans**: The development will work in partnership with the Council's Economic Development team and other key local partners to deliver effective Employment and Skills Plans, to maximise opportunities for local labour and upskilling. This is outlined within the Construction Phase Social Value Framework that will be submitted with the planning application and builds upon the outcomes of a Social Value Workshop, held with local stakeholders in February 2026.
- **Benefit 12: Market-Leading Facilities:** The amenities proposed within the development will be best-in-class. This, combined with the quality of the buildings and the landscaped setting, will attract renowned employers to the Site.

3.4.7 From this, it is apparent that significant benefits associated with enabling the delivery of a best-in-class logistics park in an optimal location, creating thousands of new jobs and delivering significant environmental and social enhancements, far outweighs the limited, localised harms associated with the development, which amount to the loss of a portion of best and most versatile agricultural land, minimal tree removals, negligible air quality implications and localised landscape harms.

3.4.8 In addition, Newlands Park Cambridge is promoted by Newlands, a logistics developer with an excellent track record of delivering large logistics sites like Newlands Park Cambridge. Subject to grant of planning permission, Newlands intend to commence delivery on site in 2028, in accordance with the following timeframe:

- Start on site: February 2028
- Strategic infrastructure works (comprising of access, earthworks, development plateaus, SuDS basins, spine road, and bunding): June/July 2028
- Strategic landscaping, habitat creation and planting: November 2028
- First occupation is expected in 2029
- Full occupation is expected by end of 2032

4 REQUESTED MODIFICATIONS

4.1.1 At this stage, Newlands objects to the Proposed Submission Plan. In the previous sections of these Representations, Newlands has explained why the Publication Plan is considered to be 'unsound' and has offered up a course of action to make Draft Policies S/JH (New Homes and Jobs) and J/NE (New Employment Development Proposals) acceptable. Newlands considers the following modifications are also necessary for the GCLP to be found sound.

4.1.2 **Modification 1 – Industrial & Logistics Requirement:** Increase the provision for Industrial & Logistics to account for Greater Cambridge's local requirement plus Greater Cambridge's share of strategic (regional/national) need calculated across the wider FEMA in line with the PPG. This increases the objectively assessed need to 709,000 sqm of I&L floorspace. Policy S/JH and the supporting text (currently referenced at Paragraph 2.12 of the Proposed Submission Plan) should reflect this requirement with additional suitably located employment sites allocated to meet it.

(Reason: Utilises a PPG compliant approach to ensure alignment with Paragraphs 85-87 of the 2024 NPPF, such that it is in accordance with 2024 NPPF Paragraph 36, i.e. the Plan is positively prepared, to deliver economic growth that is aligned with objectively assessed need and to provide for the locational requirements of I&L operators at a variety of scales and in suitably accessible locations).

4.1.3 **Modification 2 – Development Strategy and Site Allocation:** Allocate Land at Brickyard Farm, Boxworth (HELAA Reference 47353) for up to 160,000 sqm of Logistics (Use Class B8) floorspace within Part (e) of Draft Policy S/DS (Development Strategy). Include the site within the Development trajectory and amend the Policies Map accordingly.

(Reason: to ensure sufficient sites are available that can deliver the objectively assessed I&L needs throughout the Plan Period, respond to market signals and provide for a variety of unit sizes at suitable locations, which benefit from direct access to the Strategic Road Network (A14)).

4.1.4 Newlands would welcome the opportunity to discuss appropriate wording for a Site Allocation at Brickyard Farm Boxworth (Newland Park Cambridge) with the Council to capture the appropriate nature, scale and detail of the proposed development, as well as any requisite mitigation in advance of the GCLP hearing sessions.

4.1.5 **Modification 3 – Restriction on Large Scale Warehousing and Distribution Facilities:** Amend Policy J/NE to remove Part (8) constraints upon large-scale warehousing and distribution facilities providing for national or regional needs.

(Reason: To respond to evident market signals and the substantial demand identified for units of greater than 100,000 sq. ft in Greater Cambridge, and to ensure that Greater Cambridge makes provision for its share of strategic (regional/national) I&L from the wider FEMA).

4.1.6 **Modification 4 – Affordable Workspace:** Either delete Policy J/AW in respect of Industrial & logistics development or substantially modify the policy to provide a more targeted, flexible and proportionate approach. At present the policy is not sufficiently justified, proportionate and effective. It applies a blanket approach to any development over 2,500 sqm across a broad range of industrial and storage development with differing characteristics, values and operational requirements.

4.1.7 The Greater Cambridge Affordable Workspace Study 2026 identifies a problem affecting micro-enterprises, start-ups, SMEs, creative businesses and other smaller occupiers. These forms of business, and their accommodation, are materially different from many of the large-format I&L buildings, which will be captured by Policy J/AW.

I&L buildings are almost exclusively designed for a single occupier with little or no practical capacity to accommodate small businesses, creative enterprises, maker space or managed workspace. They cannot be subdivided into smaller units without affecting servicing, security arrangements, loading configuration or attractiveness to the intended occupier. The Council's own Affordable Workspace Study recognises this issue.

4.1.8 It is also not appropriate for I&L schemes, which do not generate a demand for the type of small-scale affordable workspace identified by the Council's evidence, to provide such workspace in another location or by payment in lieu. There needs to be a clear evidenced planning justification for transferring the cost of that wider policy objective to the I&L sector.

4.1.9 The principal cause of affordability is the lack of supply, particularly in the case of I&L, which has been constrained by restrictive Policy E/11 of the South Cambridgeshire Local Plan (2018), in part replicated in Draft Policy J/NE. As highlighted by Bidwells (Appendix 4), the lack of supply of larger units has prevented existing businesses upscaling or relocating into modern accommodation, that could otherwise release existing premises for other occupiers or enhancement. Increasing supply and choice can therefore form part of the response to affordability pressures, provided that the authorities plan in full for objectively assessed need (see Modifications 1, 2 and 3 above).

(Reason: The evidence does not sufficiently justify the proposed 20% discount. If the Councils are minded to retain Policy J/AW in relation I&L development, it should be substantially redrafted to provide a more targeted, flexible and proportionate approach, based on demonstrated local need, operational suitability and viability, including the cumulative cost of other Local Plan and infrastructure requirements, allowing for appropriate exclusions where the characteristics of the development make on-site provision unsuitable.)

4.1.10 **Modification 5 – Policy I/ST – Recognition of Operational Requirements of Industrial & Logistics**: I&L uses are fundamentally reliant on efficient and reliable access to the Strategic Road Network, particularly for Heavy Goods Vehicles (HGVs). Operational efficiency is maximised where HGVs can access the SRN quickly and directly, without the need to route through local roads or junctions designed primarily to serve local movements. Consistent with National Highways' Circular 01/2022; and Paragraph 87 of the NPPF, Policy I/ST recognise the locational requirements of strategic-scale logistics operators, where access to the SRN is paramount. Allocations for I&L uses should clearly reflect this as the principal rationale for site selection, with efforts subsequently made to maximise accessibility for employees by sustainable modes.

(Reason: The principle of maximising access for employees by active travel and sustainable methods is supported, but needs to be balanced against the specific requirements of the Logistics Sector, and should not be the principal driver for allocating sites for large scale logistics development.)

4.1.11 **Modification 6 – Policy BG/BG, Biodiversity Net Gain:** Amend the policy so that the 20% Biodiversity Net Gain sought for major development is expressed as an aspiration to be achieved, where feasible, rather than as a requirement, with the mandatory 10% BNG established by the Environment Act 2021 retained as the policy requirement.

(Reason: The proposed 20% requirement is a significant increase above the mandatory position established by the Environment Act 2021. Not all sites will be able to achieve 20% and flexibility is required to enable development to come forward in appropriate and sustainable locations. Applied as a blanket requirement, and in combination with the other policy requirements of the Plan and the emerging

Community Infrastructure Levy, it risks unintended consequences for scheme viability. Notwithstanding, the proposals for the Site would deliver well in excess of the mandatory 10% net gain, with an aspiration to achieve the 20% on-site where this can be achieved without prejudicing scheme viability.)

4.1.12 Newlands would welcome the opportunity to discuss appropriate policy wording with the Councils in advance of the hearing sessions.

4.1.13 **Modification 7 – Policy BG/UGF, Urban Greening Factor:** Amend the policy so that the Urban Greening Factor requirement is targeted at development sites and locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield sites and sites within the Green Belt, rather than applied as a blanket requirement to all major development.

(Reason: Draft Policy BG/UGF would require all major development to achieve an Urban Greening Factor score of 0.5, except where more than 50% of the site area is demonstrated to be accessible greenspace.)

4.1.14 National policy refers to the Urban Greening Factor in a specific context. Paragraph 159 of the 2024 NPPF, addressing the improvements to green spaces required as part of the Golden Rules for Green Belt release, states:

"*159. The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes."*

4.1.15 Whilst the principle of urban greening is supported, it is considered that Draft Policy BG/UGF is proposed to be applied as a blanket to all development sites, not just those within the Green Belt or at brownfield development sites. This could act as an excessive technical requirement for development on greenfield sites.

4.1.16 The Natural England guidance 'Urban Greening Factor for England User Guide Green Infrastructure Framework Standards for England' (January 2023)[1] states:

"UGF is a planning tool that focuses on the greening of urban areas, and it is recommended that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character. Where appropriate its use can also be targeted to development sites and locations where the level of urban greening is a significant planning issue or requirement. This may include the redevelopment of brownfield or post-industrial sites in rural locations or the creation of garden communities that would be expected to provide a significant proportion of green infrastructure across the entire development."

4.1.17 In order to conform more closely with national policy and Natural England guidance, Draft Policy BG/UGF should be amended so that it is targeted to development sites and locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield sites and sites within the Green Belt.

4.1.18 **Modification 8 – Policy GP/LC, Landscape:** amend the policy to align with the NPPF, notably Paragraphs 187 and 188, which require Local Authorities to protect valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan. The referenced Greater Cambridge Landscape Character

[1] Urban Greening Factor for England User Guide

Assessment (2021) pre-dates the 2024 NPPF and Policy GP/LC should be amended to either (i) replace the word ‘must’ with ‘should’ or (ii) define the protected valued landscapes within Greater Cambridge, within the policy. As written the policy is categoric and reads as if all forms of development must protect, conserve or enhance all forms of landscape across Greater Cambridge.

4.1.19 Paragraph 135 of the 2024 NPPF states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). The scale of development required (to deliver both housing and employment need) in Greater Cambridge is significant and will inevitably impact some landscapes within its geography. The policy should reflect this, by either highlighting the areas of greatest value (that should be afforded greater protection), or be amended to align with recognition of change.

(Reason: The policy wording is inconsistent with the 2024 NPPF, and potentially ineffective, through the use of the word ‘must’ by placing too greater emphasis on the need to protect, conserve or enhance all landscape within Greater Cambridge.)

5 CONCLUSIONS

5.1.1 These Representations have been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Newlands (Cambridge) Limited (Newlands), to the Greater Cambridge Proposed Submission Local Plan (Regulation 19) Consultation that is open until 25th September 2026.

5.1.2 The Representations relate to an 88-hectare site, known locally as 'Brickyard Farm, Boxworth Farm, Boxworth' that is being promoted by Newlands Developments for up to 160,000 sqm of logistics floorspace (Use Class B8), as well as HGV parking (Sui Generis) alongside substantial areas of green and blue infrastructure. Further details are contained in the Opportunity Document in Appendix 5.

5.1.3 The Site, which will be known as Newlands Park Cambridge, is under the control of Newlands who have an excellent track record and will be responsible for its promotion, delivery and management.

5.1.4 The Site has been promoted through all previous stages of the GCLP and these Representations should be read in conjunction with the those made at the Regulation 18 stage, which are included as Appendix 2.

5.1.5 The GCLP is considered 'unsound' when assessed against the tests of soundness contained in Paragraph 36 of the 2024 NPPF. It is not positively prepared, justified, effective nor is it consistent with national policy that recognises logistics as being vital to the UK economy.

5.1.6 The evidence base has ignored strategic employment need altogether, and plans for local Industrial and Logistics (I&L) needs only. Consequently, the Greater Cambridge Local Plan (GCLP) fails to plan for its objectively assessed need (as a minimum).

5.1.7 In doing so, the GCLP has failed to follow the clear guidance contained in the PPG around assessing the need for strategic logistics, in that:

- It has not assessed strategic need across the FEMA. The broad consensus is that this should be the Cambridgeshire and Peterborough Combined Authority (CPCA) geography that will form the basis of the upcoming SDS;
- It has ignored key market signals that indicate a severely supply constrained market (i.e. immediate need/strong occupier demand for larger, modern units, extremely low vacancy rates and rental growth ahead of inflation); and
- There has been a distinct lack of co-operation between the constituent local authorities around the apportionment of strategic need despite it being a good time to undertake this exercise given a number of the local plans are at the same stage (Regulation 19).

5.1.8 A lack of effective engagement with adjoining authorities and an inadequate response to market signals raised at all previous stages of the GCLP's preparation by landowners, local organisations, agents and operators has led to the preparation of a Plan that does not plan for its objectively assessed need nor does it provide for the range of space required by logistics operators in suitable locations as required by Paragraph 87 of the NPPF.

5.1.9 Whilst there has been a relaxation in the restriction on strategic logistics under Draft Policy J/NE from the Regulation 18 stage, this does not go far enough, and the policy continues to be unsound as it continues to have no regard to key markets signals.

5.1.10 The proposed approach of dealing with the assessment of strategic need through the forthcoming SDS evidence base will mean immediate strategic needs are not addressed through local plan allocations for a considerable period of time. This will

result in a prolonged planning hiatus / policy lacuna. This is further compounded by the SDS process itself, that is fraught with uncertainty.

5.1.11 Deferring the assessment strategic needs to the SDS rather than dealing with it now, is at odds with other examples of positive planning:

- In Leicestershire, eight local authorities are cooperating on the distribution of strategic warehousing need that is captured through a Statement of Common Ground (see Appendix 6).
- In Warwickshire, there is a similar example where the distribution of strategic employment need was secured via a Memorandum of Understanding (see Appendix 7).
- In the emerging North Northamptonshire Local Plan, local need for industrial use and non-strategic warehousing is considered separately but in addition to strategic need.

5.1.12 Newlands consider the above approaches provide a blueprint for the GCLP and considers their deployment would go a long way to making it sound.

5.1.13 Adopting the approach set out within Chapter 3 of these Representations, comprising an assessment of the wider FEMA and apportionment down to Greater Cambridge following collaboration with neighbouring authorities, is a sound approach which deals with, rather than defers, strategic planning matters, as required by Paragraph 36 of the 2024 NPPF.

5.1.14 Accordingly, Newlands' economic experts, Stantec, have undertaken a PPG-compliant assessment of strategic need across the FEMA, which, when apportioned down to Greater Cambridge, identifies an objectively assessed need figure of 709,000 sqm. As such, the Draft GCLP policies should be amended to reflect this and additional employment sites allocated to meet this need.

5.1.15 The shortfall in logistics floorspace between this figure and that currently in the Proposed Submission Plan (i.e. 392,000 sqm) should then be planned for through additional sites allocated in suitably accessible locations, such as along the A14 Corridor. Iceni recognise the A14 as an appropriate location for logistics that has been reinforced through recent appeal decisions.

5.1.16 Newlands Park Cambridge is available now and ideally located to accommodate up to 22% of Greater Cambridge's unmet need. It benefits from direct unfettered access to the Strategic Road Network (A14), which should be a primary determining factor when selecting strategic employment sites consistent with Paragraph 110 of the 2024 NPPF. The scheme will also deliver a plethora of economic, social and environmental benefits.

5.1.17 The allocation of Newlands Park Cambridge would diversify the logistics offer, through the allocation of an available and deliverable site. The Site enables a wide range of unit sizes to be delivered, tailored to market demand, with direct access to the A14 that is unrivalled by any site allocated to date. As set out in representations to the Regulation 18 consultation, the Council's HELAA 2025 identifies that the scale of development proposed can be mitigated through a planning application.

5.1.18 Following extensive engagement with Greater Cambridge's Shared Planning Team, other key stakeholders and the local community, an outline planning application is being submitted imminently. This signals Newlands' intent to deliver these benefits as early as possible in the Plan Period. The Site's allocation within the GCLP would go some way to remedying its current soundness issues, but would also provide a robust basis to guide the determination of this application.

5.1.19 Newlands requests that the Proposed Submission Plan be modified as set out at in Chapter 3: The Solutions to the Key Issues; and the modifications set out in Chapter 4 of these Representations to make the Plan sound.

5.1.20 Newlands through Twenty5, wishes to participate in the Examination hearing sessions relevant to the matters raised within these duly made Representations. Newlands reserves the right to submit further Representations, including Matters Statements, as the Examination progresses.

5.1.21 In the meantime, Newlands would welcome the opportunity to engage with the Councils on the matters raised in these representations in advance of submission for Examination.

APPENDIX 1 – SITE LOCATION PLAN

APPENDIX 2 – REGULATION 18 REPRESENTATIONS (TWENTY5)

APPENDIX 3 – STANTEC GREATER CAMBRIDGE INDUSTRIAL & STRATEGIC NEEDS ASSESSMENT (SEPTEMBER 2026)

APPENDIX 4 – BIDWELLS MARKET DEMAND REPORT (LETTER DATED 21 JULY 2026)

APPENDIX 5 – NEWLANDS PARK CAMBRIDGE OPPORTUNITY DOCUMENT (SEPTEMBER 2026)

APPENDIX 6 – LEICESTER & LEICESTERSHIRE SOCG (MARCH 2026)

APPENDIX 7 – COVENTRY, WARWICKSHIRE & HINCKLEY & BOSWORTH EMPLOYMENT MEMORANDUM OF UNDERSTANDING (JULY 2016)