Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name		Lyndon Gill
Organisation (where relevant)	Newlands (Cambridge) Limited	Twenty5 Planning Ltd
Job Title (where relevant)		Senior Director
Address, including Post Code		50-60 Station Road Cambridge CB1 2JH
Telephone		07984 737868
Email address		lyndon.gill@twenty5.co.uk

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy BG/UGF: Urban Greening Factor
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	No
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

This response should be read alongside, and considered as a whole together with, the full representations prepared by Twenty5 Planning Ltd: 'Newlands Park Cambridge: Brickyard Farm, Boxworth CB23 4WU – Greater Cambridge Local Plan Regulation 19 Representations on behalf of Newlands Developments' (September 2026), including its appendices, which sets out Newlands' full and comprehensive response to the Proposed Submission Plan. This form summarises the points relevant to this policy and does not replace that document.

These representations are made by Twenty5 Planning Ltd on behalf of Newlands (Cambridge) Limited ('Newlands') in respect of Land at Brickyard Farm, Boxworth (HELAA Reference 47353), promoted as Newlands Park Cambridge. The c.88 hectare site lies south of the A14 and is promoted for up to 160,000 sqm of storage and distribution floorspace (Use Class B8), HGV parking (Sui Generis) and substantial green and blue infrastructure, with direct access from the southern dumbbell roundabout of A14 Junction 24 (Swavesey). An outline planning application is to be submitted imminently.

Newlands supports the principle of urban greening but objects to Policy BG/UGF as drafted. The policy would require all major development to achieve an Urban Greening Factor (UGF) score of 0.5, except where more than 50% of the site area is demonstrated to be accessible greenspace. It is therefore applied as a blanket requirement to all development sites, not just those within the Green Belt or brownfield sites, and could act as an excessive technical requirement for development on greenfield sites.

National policy refers to the UGF in a specific context. NPPF Paragraph 159, which addresses the improvements to green spaces required as part of the Golden Rules for Green Belt release, states that, where no locally specific standards exist, proposals should meet national standards, including Natural England standards on accessible green space and urban greening factor.

Natural England's 'Urban Greening Factor for England User Guide' (Green Infrastructure Framework, January 2023) describes the UGF as a planning tool focused on greening urban areas, and recommends that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character. Where appropriate, it can also be targeted at development sites and locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield or post-industrial sites in rural locations, or garden communities expected to provide a significant proportion of green infrastructure.

A blanket 0.5 UGF target across all major development, including greenfield employment sites in rural locations, goes beyond this guidance and national policy. It is not justified by the evidence and is not consistent with national policy. It also adds to the cumulative burden of policy requirements on development, alongside BNG and other Plan requirements.

Please provide a 100 word summary of your representation.

Newlands supports urban greening, but Policy BG/UGF is unsound: it applies a blanket Urban Greening Factor score of 0.5 to all major development, including greenfield sites. National policy (NPPF Paragraph 159) refers to the UGF in the context of Green Belt release, and Natural England's UGF User Guide (2023) recommends applying it to predominantly urban or suburban areas or targeting it at sites where urban greening is a significant planning issue, such as brownfield redevelopment. The policy should target the UGF at such sites, including Green Belt sites, rather than all major development.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please Refer to Full Representations Document prepare by Twenty5 Planning:
"NEWLANDS PARK CAMBRIDGE: BRICKYARD FARM, BOXWORTH CB23 4WU:
Greater Cambridge Local Plan Regulation 19 Representations:
On behalf of Newlands Developments (September 2026)

In addition, the associated 7 Appendices:

- Appendix 1 – Site Location Plan
- Appendix 2 – Regulation 18 Representations (January 2026)
- Appendix 3 – Greater Cambridge Industrial & Logistics Needs Assessment (Stantec September 2026)
- Appendix 4 – Bidwells Market Report
- Appendix 5 – Newlands Park Cambridge Opportunity Document (September 2026)
- Appendix 6 – Leicester & Leicestershire Authorities - Statement of Common Ground relating to Strategic Warehousing Need (March 2026)
- Appendix 7 - Coventry, Warwickshire and Hinckley & Bosworth Joint Committee Employment Land Memorandum of Understanding (2016)

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

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.)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Our Objections to the Policy are fundamental, and whilst we would work with the Authorities to find solutions prior to Examination, participation at the Examination Hearing is necessary as the Local Plan is not considered to be legally compliant or sound. Attendance at the hearing sessions will provide an opportunity to explain these concerns in greater detail, respond to matters raised by the Inspector and other parties, and discuss the modifications required to make the Plan sound.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes