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 Limited
Job Title (where relevant)		Director
Address, including Post Code		50/60 Station Road Cambridge CB1 2JH
Telephone		07984737868
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 J/NE (New Employment Development Proposals)
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.

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 objects to Policy J/NE. At Regulation 18 the policy prohibited regional and national distribution proposals, continuing the approach of Policy E/11 of the South Cambridgeshire Local Plan 2018. The Regulation 19 version relaxes this, but Part (8) still provides that 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 Plan policies and priorities, and that the proposal will not impede delivery of space meeting local market needs in market sector priority locations. The Jobs Topic Paper (2026) confirms the intention is to prioritise local needs, with regional and national requirements left to the Cambridgeshire and Peterborough SDS.

The Policy is still considered to be unsound. It does not account for market signals in conflict with PPG Paragraph 031 Reference ID: 2a-031-20190722 and Paragraph 32 of the 2024 NPPF. The evidence of strategic need is unequivocal. Bidwells (Appendix 4 of representations) identifies unsatisfied requirements for units over 100,000 sq ft totalling 10.5 million sq ft in the regional market. The UK average new unit size in 2025 was 239,000 sq ft and as of July 2026 only two consented sites within c.20 miles of Cambridge can serve occupiers over 100,000 sq ft; and only c.640,000 sq ft is available in existing large units in Cambridgeshire (two buildings in Peterborough, only one Grade A).

Savills' Market Assessment for application 26/02534/OUT finds large-unit availability in Greater Cambridge of 1.9%, only 0.3 years of good quality supply, rental growth well ahead of inflation, and that the restrictive policy environment as set previously by E/11 of the 2018 South Cambridgeshire Local Plan has distorted the market and led to a long-standing shortage for larger premises and logistics uses. Existing Cambridge occupiers have struggled to find modern larger premises locally.

Rather than planning positively for this need, Part (8) requires it to be re-proven application by application. For the policy to function, the Councils would in any event have to quantify strategic need – as they will also need to do when determining pending and forthcoming A14 planning applications against Policy S5 of the 2026 NPPF. The need should therefore be quantified and planned for now through the Plan (see our representation on Policy S/JH, which identifies an objectively assessed need of 709,000 sqm based on Stantec's PPG-compliant assessment, Appendix 3).

The Authorities Draft SoCG(i) asserts that, pending the SDS, there is a 'very significant' supply of B2/B8 land across Cambridgeshire, Peterborough and the A14 corridor. However, the supporting table is unsourced, does not identify the sites, whether they fall within the CPCA geography or whether they are suitable for strategic logistics. Savills identifies only c.88,475 sqm of permitted B-class floorspace in Greater Cambridge, much of it restricted to other uses or likely to come forward as R&D/offices; Stantec's analysis identified only 4,518 sqm at Anderston Road as likely to come forward for B2/B8. Logistics has distinct locational requirements (NPPF Paragraph 87 and PPG Paragraph 031), so it cannot be assumed that all permitted or allocated employment land can accommodate strategic-scale storage and distribution.

Deferral to the SDS is not an effective interim strategy. The SDS's scope is unconfirmed and it is not expected to allocate sites. Adoption is unlikely before late 2029, with allocations through a subsequent Local Plan unlikely before 2032/33. The withdrawal of Local Government Reorganisation in some areas adds further uncertainty. SoCG(i) is unsigned and neighbouring authorities are taking far more proactive approaches as set out in the full copy of our representations. Part (8) would therefore perpetuate the policy hiatus for strategic logistics for much of the plan period, contrary to the requirement of NPPF Paragraph 36(c) that cross-boundary strategic matters are dealt with rather than deferred.

Prior to Examination, West Suffolk's submitted Plan (January 2024) took a very similar approach, deferring strategic logistics to a sub-regional exercise and restricting storage and distribution proposals over 9,000 sqm. The Inspectors' Report (1 July 2025) found that the restriction was not justified and recommended its deletion from Policy SP12, together with equivalent unit-size restrictions in allocation Policies AP15, AP16, AP19 and AP38 (MM81, MM82, MM85 and MM104). A restriction pending a sub-regional exercise was not justified there and is not justified here.

Accordingly, Policy J/NE is not positively prepared as it continues to suppress strategic-scale logistics in the face of clear need. It is not justified as it disregards market signals and relies on unevidenced interim supply, contrary to NPPF Paragraph 32. It is not effective as it requires need to be evidenced by applicants when it is already clear such a need exists, and defers a cross-boundary matter. It is not consistent with national policy, in particular NPPF Paragraphs 85–87, which require plans to identify strategic sites, meet the needs of the modern economy including freight and logistics, and provide for storage and distribution at a variety of scales in suitably accessible locations.

Please provide a 100 word summary of your representation.

Policy J/NE remains unsound. It fails to account for, and restricts large-scale warehousing and distribution serving regional or national needs unless applicants demonstrate unmet need and no impact on local delivery. The need is already clearly evidenced by market signals (10.5 million sq ft of unsatisfied large-unit requirements, 1.9% large-unit availability), so the policy disregards NPPF Paragraph 32 and conflicts with Paragraphs 85–87 and PPG Paragraph 031. Deferral to an uncertain SDS perpetuates a policy hiatus. The West Suffolk Inspectors' Report (2025) deleted an equivalent restriction. Part (8) should be deleted.

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.

At this stage, Newlands objects to the Proposed Submission Plan. In the main document of ouur 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.

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).

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)).

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.

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).

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