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 S/DS (Development Strategy)
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 objects to Policy S/DS and to the Policies Map insofar as they omit Newlands Park Cambridge. Because the development strategy flows from the industrial and logistics (I&L) requirement in Policy S/JH and the approach to strategic logistics in Policy J/NE – both of which Newlands considers unsound – Policy S/DS is similarly flawed. It does not identify sufficient sites to meet objectively assessed I&L need and makes no provision for strategic-scale logistics in suitably accessible locations.

The Plan's 317,000 sqm I&L requirement reflects Greater Cambridge's local need only as identified by Iceni Projects. Stantec's PPG-compliant assessment of need across the Cambridgeshire and Peterborough FEMA (Appendix 3) identifies an objectively assessed need of 709,000 sqm, comprising 317,000 sqm local need, 312,000 sqm of apportioned strategic (regional/national) need and 80,000 sqm arising from growth in online expenditure (see Newlands' representations on Policies S/JH and J/NE).

Draft allocations with a stated B2/B8 quantum total only c.320,000 sqm as follows:

- S/SHF Land North of A1307 Bar Hill (Slate Hall Farm) c.220,000 sqm;
- S/RRA/SCS Land to the South of Cambridge Services c.90,000 sqm; and
- S/RRA/BBP Land at Buckingway Business Park c.10,000 sqm.

Mixed-use allocations where any B2/B8 component is not quantified (e.g. Cambourne North, Waterbeach New Town, Northstowe) provide no basis on which supply can be relied upon.

Newlands has concerns over the deliverability of the 90,000 sqm attributed to S/RRA/SCS. Delivering this on c.22.3 hectares (what is remaining after lorry parking) would require a plot ratio of c.40%, roughly double the c.19% implied at Slate Hall Farm, leaving limited room for landscaping, circulation and BNG.

The promoter's own indicative masterplan shows c.70,600 sqm – over 20% less than the policy quantum. Even with the allocation of Newlands Park Cambridge, supply would be c.460,000 sqm, leaving a shortfall of c.249,000 sqm (only 65% of need). Additional allocations are therefore required.

Accordingly additional allocations should be in suitably accessible locations. NPPF Paragraph 87 requires plans to provide for storage and distribution operations at a variety of scales and in suitably accessible locations. The PPG (Paragraph 031 Ref ID 2a-031-20190722) states that strategic facilities are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. The Councils' own evidence – Iceni's Greater Cambridge Warehouse and Industrial Space Needs report (2025) – identifies Strategic Road Network access, with an M11/A14 location close to junctions, as the key locational requirement for strategic distribution, together with access to labour within c.30 minutes' drive.

The A14 is a nationally significant freight corridor linking the Port of Felixstowe to the M1/M6. It carries around 85,000 vehicles per day, 26% of which are HGVs against a national average of 10%. Its role as a priority route for strategic logistics was confirmed in the recently allowed Thrapston appeal (APP/M2840/W/25/3362393). Unfettered access to the A14 should therefore be an essential criterion in selecting sites to meet strategic-scale need.

Newlands Park Cambridge is ideally placed to meet a substantial part of the need, in full accordance with NPPF Paragraph 87:

- Location and access: direct access from the enlarged southern dumbbell roundabout of A14 Junction 24, unrivalled by any site allocated to date. The junction works will also address forecast capacity issues in the 2040 future year scenario.
- Scale: up to 160,000 sqm of B8 floorspace (c.22% of Greater Cambridge's need), enabling a range of unit sizes tailored to market demand, plus 60 HGV parking bays.
- Suitability: the Councils' HELAA (2025) identifies that the scale of development proposed can be mitigated through a planning application. The limited, localised harms (loss of some best and most versatile agricultural land, minimal tree removal, negligible air quality effects and localised landscape effects) are clearly outweighed by the benefits.
- Environmental benefits: minimum 18.53% canopy cover; biodiversity net gains of +25.74% (habitat), +106.67% (hedgerow) and +17.99% (watercourse) units; BREEAM Excellent and EPC A as a minimum; enhanced cycle and footway links to Boxworth; additional bus stops, contributions to bus capacity and shuttle services committed for five years.
- Economic and social benefits: c.2,060 FTE jobs, well matched to a local labour pool identified by CBRE; business rates estimated at £5.2 million per annum; Employment and Skills Plans; and supply chain support for Greater Cambridge's knowledge economy and key growth sectors.
- Engagement: the proposals have been reviewed by the Greater Cambridge Design Review Panel (January 2026) and are supported by a Design Code prepared with officers. There has been pre-application engagement with Cambridgeshire County Council, National Highways, the Environment Agency, Swavesey Parish Council, Swavesey IDB and Stagecoach.
- Deliverability: the site is controlled by Newlands, an experienced logistics developer, and an outline application is to be submitted imminently. The

anticipated timetable is a start on site in February 2028, first occupation in 2029 and full occupation by the end of 2032.

Allocation of Newlands Park Cambridge would go some way to remedying the Plan's soundness issues on employment land, and would provide a more robust policy basis.

Conclusion on soundness

Policy S/DS and the Policies Map are not positively prepared (they do not provide sites to meet objectively assessed I&L need). The policy is not justified (it relies upon uncertain supply and defers strategic need to the SDS). It is not effective (no strategic-scale logistics sites are identified to meet immediate requirements). It is not consistent with national policy (NPPF Paragraphs 11(b), 36, 86(b) and 87 and PPG Paragraph 031).

Please provide a 100 word summary of your representation.

Policy S/DS and the Policies Map are unsound because they flow from an I&L requirement (Policy S/JH) that reflects local need only. Stantec's PPG-compliant assessment identifies need of 709,000 sqm. Draft allocations with a stated B2/B8 quantum provide only c.320,000 sqm, with deliverability concerns at S/RRA/SCS. NPPF Paragraph 87 and the Councils' own evidence point to A14/M11 locations close to junctions. Newlands Park Cambridge, with direct A14 Junction 24 access, is deliverable and could provide up to 160,000 sqm. It should be allocated under Part (e) of Policy S/DS and shown on the Policies Map.

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.

Modification 2 – Development Strategy and Site Allocation: Amend Policy to 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)).

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 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).

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