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/JH (New Jobs and Homes)
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/JH. The industrial and logistics (I&L) requirement within the Draft Local Plan plans for local need only and ignores strategic (regional/national) logistics. The policy is therefore not positively prepared, justified, effective or consistent with national policy when assessed against Paragraph 36 of the 2024 NPPF, against which the Plan will be examined under the transitional arrangements.

The PPG requires strategic policy-making authorities to assess need on a cross-boundary basis across the Functional Economic Market Area (FEMA) and, for logistics, to identify the scale of need across the relevant market area in collaboration with neighbouring authorities (Paragraph 025 Ref ID 2a-025-20190220 and Paragraph 031 Ref ID 2a-031-20190722).

The 317,000 sqm requirement derives from the Employment and Housing Needs Update (2025), which covers Cambridge City and South Cambridgeshire only (REDCR 2026, Paragraph 5.6). The Councils' draft Supplementary Statement of Common Ground on Meeting Sub-Regional Logistics Needs (SoCG(i)) confirms that the figure reflects local requirements only and that regional and national warehousing needs have not been considered, deferring them to the Cambridgeshire and Peterborough Spatial Development Strategy (SDS).

Greater Cambridge is not the FEMA for strategic logistics. The FEMA should be the Cambridgeshire and Peterborough Combined Authority (CPCA) geography, as recognised by the CPIER Interim Report (2018), the Cambridge and Peterborough Local Industrial Strategy (2019), Iceni's Greater Cambridge Employment and Economic Needs Study (2020) and Savills' Market Assessment (May 2026) for application 26/02534/OUT.

Iceni's own Employment and Housing Evidence Update (January 2023) accepts that 'big box' occupiers search at a sub-regional level beyond Greater Cambridge. The Plan

therefore does not provide for objectively assessed needs as a minimum, contrary to the 2024 NPPF.

NPPF Paragraph 32 and the PPG require policies to take account of relevant market signals. The evidence shows an acutely supply-constrained market:

- Bidwells (Appendix 4) 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.
- As of July 2026 only two sites within c.20 miles of Cambridge have outline consent for B2/B8 occupiers over 100,000 sq ft, and only c.640,000 sq ft is available in existing units over 100,000 sq ft in Cambridgeshire, in two buildings in Peterborough, only one of which is Grade A.
- Vacancy sits well below the 7.5% equilibrium level (averaging 3.3% across the FEMA). Savills finds large-unit availability in Greater Cambridge of just 1.9%, 2.6 years of immediately available I&L supply and as little as 0.3 years of good quality supply, and that c.78% of stock will not be fit for occupation after 2030.
- Logistics rental growth reached 1.52 times inflation by the end of the look-back period. Greater Cambridge holds less than 10% of the CPCA's strategic-scale I&L inventory despite accommodating 34% of its population and 43% of its jobs.
- Around 1.3 million sq ft of occupied employment land in Cambridge City is allocated for residential use; 94,000 sq ft has already been repurposed and a further 333,000 sq ft is set to be redeveloped within two to three years.

The net absorption method used by Iceni masks true demand where employment land is being lost, and can make demand appear artificially low; gross completions provide a more accurate measure. Retaining the methodology fails to counter Greater Cambridge's evident weaknesses, contrary to NPPF Paragraph 85, and sits at odds with the Modern Industrial Strategy (November 2025), which recognises the importance of freight and logistics.

NPPF Paragraph 36(c) requires cross-boundary strategic matters to be dealt with rather than deferred. Deferral to the SDS is unsound because: (i) the scope of SDSs is unconfirmed and they are not expected to allocate sites; (ii) an SDS is unlikely to be adopted before late 2029 at the earliest, with allocations through a subsequent Local Plan unlikely before 2032/33, prolonging the existing policy hiatus.

Best practice elsewhere shows that strategic need can be quantified and apportioned – see The Leicester & Leicestershire SoCG (March 2026, Appendix 6); the Coventry, Warwickshire and Hinckley & Bosworth MoU (2016, Appendix 7); and the North Northamptonshire HENA Update (April 2026).

The West Suffolk Local Plan Inspectors' Report (1 July 2025) is directly relevant and effective cross-boundary co-operation on this matter has not taken place, contrary to NPPF Paragraphs 24–28.

Stantec's Greater Cambridge Industrial and Strategic Needs Assessment (September 2026, Appendix 3) assesses need across the CPCA FEMA in accordance with PPG Paragraph 031, using the BPF/Savills 'suppressed demand' model and the same ten-year look-back (2014–2023) as Iceni. It identifies actual FEMA demand of 89,927 sqm per annum. Apportioning 17% to Greater Cambridge (based on the VOA's record of non-domestic rated property) gives a minimum strategic requirement of 312,000 sqm (c.125 hectares at a 25% plot ratio), plus 80,000 sqm arising from growth in online expenditure. Together with the 317,000 sqm local requirement, the objectively assessed need is 709,000 sqm.

Draft allocations with a stated B2/B8 quantum total only c.320,000 sqm (S/SHF Slate Hall Farm c.220,000 sqm; S/RRA/SCS Land South of Cambridge Services c.90,000 sqm; S/RRA/BBP Buckingway Business Park c.10,000 sqm). Mixed-use allocations with no quantified B2/B8 component (e.g. Cambourne North, Waterbeach, Northstowe) cannot be relied upon. The 90,000 sqm at S/RRA/SCS implies a plot ratio of c.40%, roughly double that implied at Slate Hall Farm, and the promoter's own indicative masterplan shows only c.70,600 sqm. Even with the allocation of Newlands Park Cambridge, supply would be c.460,000 sqm – a shortfall of c.249,000 sqm (only 65% of need).

NPPF Paragraph 87 requires provision for storage and distribution at a variety of scales and in suitably accessible locations, and the PPG and Iceni's Warehouse and Industrial Space Needs report (2025) identify SRN access (M11/A14, close to junctions) as the key locational requirement. The A14 is a nationally significant freight corridor linking the Port of Felixstowe to the Midlands, as confirmed in the Thrapston appeal decision (APP/M2840/W/25/3362393). Newlands Park Cambridge has direct access to A14 Junction 24 and could deliver up to 160,000 sqm (c.22% of Greater Cambridge's need), c.2,060 FTE jobs, a biodiversity net gain of +25.74% (habitat units), 18.53% canopy cover, BREEAM Excellent buildings and 60 HGV parking bays. Newlands is an experienced logistics developer, with a start on site anticipated in February 2028, first occupation in 2029 and full occupation by the end of 2032.

Conclusion on soundness

Policy S/JH is not positively prepared (it does not meet objectively assessed need and is not informed by agreements with other authorities). It is not justified as it defers the matter to an uncertain SDS timeframe and places reliance on an unevidenced interim supply. It is not effective (no strategic-scale logistics sites are allocated to meet immediate requirements and cross-boundary matters are deferred). It is not consistent with national policy (NPPF Paragraphs 11(b), 16, 24–28, 32 and 85–87, and PPG Paragraph 031).

Please provide a 100 word summary of your representation.

Policy S/JH is unsound. Its 317,000 sqm industrial and logistics requirement reflects Greater Cambridge's local need only, ignoring strategic logistics need, contrary to PPG Paragraph 031 and NPPF Paragraphs 11(b), 32, 36 and 85–87. Need has not been assessed across the CPCA FEMA. Market signals of acute undersupply have been disregarded, and strategic need has been deferred to an uncertain SDS timeframe rather than dealt with. Stantec's PPG-compliant assessment identifies an objectively assessed need of 709,000 sqm. The requirement should be increased accordingly and additional well-located sites allocated, including Newlands Park Cambridge (A14 Junction 24) for up to 160,000 sqm.

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.

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 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.

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