TWENTY5

Representations in response to Greater Cambridge Local Plan Regulation 18 Consultation Newlands Park, Cambridge

January 2026

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Representations to the Greater Cambridge Local Plan Regulation 18 Consultation

Newlands Park Cambridge: Brickyard Farm, Boxworth CB23 4WU

January 2026

Prepared for: Newlands Developments

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1 Executive Summary

1.1.1 This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Newlands (Cambridge) Limited (Newlands), with respect to the Greater Cambridge Regulation 18 Local Plan Consultation that is open until 30th January 2026. It relates to land to the South of the A14, being promoted for storage and distribution uses (Class B8 Development) as well as HGV parking (Sui Generis) referred to locally as 'Brickyard Farm, Boxworth Farm, Boxworth', (HELAA Reference 47353) and will be named 'Newlands Park Cambridge' (the Site).

1.1.2 The key points we wish to make are:

1) The hostile approach to strategic scale logistics (units 100,000ft^2+), carried through from the adopted Local Plan, is at odds with national planning policy and the Government's Industrial Strategy. The notion that supporting these uses will somehow prejudice the growth of the life sciences sector is unsubstantiated, and we feel that, on the contrary, supply chain infrastructure is critical to its success.

2) Despite a lack of supply and strong market signals / demand-side evidence (Bidwells confirm 13.5 million ft^2 of unsatisfied requirements in the region for units 100,000ft^2+), the emerging Greater Cambridge Local Plan does not seek to address the 'larger than local', strategic component of employment need that is driving growth in the economy (it is noteworthy that a similar approach was deemed not justifiable by the West Suffolk Local Plan Examination Inspector). Worryingly, nor is there any evidence of this being dealt with sufficiently with neighbouring authorities, via the Duty to Co-operate, in the Local Plan evidence base (as required by the PPG).

3) The Draft Local Plan's underlying evidence base grossly underestimates employment need which is not aligned with the area's ambitious growth aspirations. Our expert economic consultants, Stantec, calculate this to be 609,000m^2 over the plan period (i.e. 292,000m^2 more than Iceni's figure of 317,000m^2). The principal reasons behind this inflated figure are:

    - A vacancy level consistently below market equilibrium.
    - Development management policies that have over the last decade prohibited the development of strategic-scale regional and national distribution centres.
    - Industrial and warehousing floorspace losses.
    - The need to replace existing floorspace to address an ageing stock and pressure from EPC ratings

4) We believe the above points make the Greater Cambridge Local Plan 'unsound'. It has not been positively prepared; it is not justified; it is not effective; nor is it consistent with national policy.

5) The above can be easily rectified through the allocation of more suitably located land for storage and distribution uses through the Greater Cambridge Local Plan. As highlighted through the Council's evidence and Newlands' recent Thrapston Appeal decision, the A14 is a freight route of national significance. Consequently, Newlands Park Cambridge's location at Junction 24 is considered ideal for meeting this unmet need, especially given its unfettered access to the Strategic Road Network that gives it a distinct advantage over other competing sites.

6) The technical work submitted in respect of the Site reinforces its suitability and deliverability for the use proposed. A technical note has been produced by RPS Tetra Tech to confirm that

there are no archaeological issues that would preclude its development and we therefore ask the Council to review this aspect of their assessment of the Site.

7) The proposals have evolved following positive and continuing engagement with Greater Cambridge Officers (under the auspices of the agreed Planning Performance Agreement) and key stakeholders/the community.

8) Newlands have an excellent track record of delivering large logistics sites and would look to swiftly deliver a plethora of economic, social and environmental benefits at Newlands Park Cambridge that go beyond policy requirements. This is captured in the accompanying Opportunity Document (January 2026).

2 Introduction

2.1.1 This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Newlands (Cambridge) Limited (Newlands), with respect to the Greater Cambridge Regulation 18 Local Plan Consultation that is open until 30th January 2026.

2.1.2 The report relates to land to the South of the A14, also referred to as 'Brickyard Farm, Boxworth Farm, Boxworth', (HELAA Reference 47353) (the Site). The Site extends to approximately 90 Hectares (Appendix 1) and has been promoted for Logistics (Use Class B8) floorspace. The Site is under the control of Newlands as strategic land promoter (the Promoter).

2.1.3 The Site was submitted for consideration as part of the Call for Sites, initially in 2019, and most recently to the revised Call for Sites exercise in March 2025.

2.1.4 The HELAA Assessment (Updated in 2025) identifies the Site as 'Amber' in terms of suitability for development, with reference to the Site having '*some potential policy constraints which could be overcome through the planning application process'.* Whilst previously identified as 'Red' in the 2021 HELAA, updated comments relating to landscape, following work submitted to the March 2025 Call for Sites consultation, now acknowledge that the scale of development could be integrated into the site subject to mitigation, detailed through an LVIA.

2.1.5 Whilst previously identified as 'Amber' in the 2021 HELAA, Archaeology has been raised as a potential barrier (red) to development in the 2025 HELAA, with additional information sought to address HER Records, and determine the Site's suitability for development. Such information has been prepared by RPS Tetratech to highlight that there are no designated archaeological assets either within the site, or sufficiently close to be impacted by the scheme, and that based on extensive geophysical surveying undertaken in 2022, the likely archaeological significance of anything on-site is no more than of regional significance. RPS Tetratech confirm this can be confirmed through a programme of trial trenching, which has already been agreed with the archaeological advisors at CHET. Nothing identified to date is considered sufficiently significant to be a constraint to development, and any archaeological potential can be realised through a programme of archaeological excavation, recording, and dissemination, which could be achieved by an appropriately worded planning condition. A letter confirming this is provided alongside these representations at Appendix 2.

2.1.6 Separately, the Promoter is engaged in a formal Planning Performance Agreement (PPA) with Greater Cambridge officers, and has submitted (and received) an EIA Scoping response in respect of the proposed development. A planning application is being prepared pursuant to both, for submission in March 2026. Extensive public consultation has been undertaken with Statutory consultees, including National Highways, the County Highway Authority, Local Lead flood Authority, and Environment Agency, whilst targeted consultation has been undertaken with local parishes and the Swavesey Internal Drainage Board. The Proposals have evolved to address issues/concerns that have arisen through this process, and through Pre-Application Meetings/Workshops with Greater Cambridge Planning, Heritage, Landscape, Sustainability, Ecology & Urban Design officers. Further details of the Scheme's evolution are provided in Chapter 3 of this report, and an updated 'Opportunity Document' for the Site is submitted alongside these representations.

2.1.7 It is acknowledged that the Site has not been identified for allocation within the Draft Local Plan. However, for reasons set out in Chapter 6 of this statement, we consider that the approach of the Draft Local Plan to the quantum and delivery of employment (and more specifically logistics) is unsound, and in conflict with national policy. We also question the basis of site selection/allocation adopted.

2.1.8 The allocation of the Site offers an opportunity to rectify those concerns and deliver significant benefits to Greater Cambridge and the wider Sub-Regional Economy through the delivery of logistics space that can meet both local and sub-regional (strategic) needs, delivering a wide range of employment opportunities to the local and wider population, and support the wider Cambridge economic ecosystem. Evidence prepared by Stantec and submitted as part of these representations, highlights a greater floorspace requirement for logistics space than planned for in the Draft Local Plan. Contrary to both the NPPF (the current 2024 and draft 2025 versions) and

PPG, the Greater Cambridge Local Plan (GCLP), does not seek to address strategic warehousing requirements beyond the purely local level. This site provides the opportunity to plug that gap along the A14 that is acknowledged as a nationally significant freight route.

2.1.9 There are no known overriding constraints to the proposed development. The Site is suitable, available, and deliverable. It has the capacity to provide circa 160,000 sq m of storage and disribution (Use Class B8) floorspace alongside a dedicated lorry park (Sui Generis), within the emerging plan period subject to planning.

Structure of Representations

2.1.10 These representations are structured as follows:

- **Section 1** – Executive Summary
- **Section 2 –** Introduction;
- **Section 3 –** Site Description and Context;
- **Section 4 –** Site Promotion and Pre-Application Engagement
- **Section 5 –** Site Opportunities and Constraints
- **Section 6** – Local Government Reorganisation
- **Section 7 –** Regulation 18 Local Plan Response
- **Section 8 –** Key Benefits of the Proposals
- **Section 9 –** Summary

3 Site Description and Context

3.1.1 The Site is located entirely within South Cambridgeshire District and principally comprises four undeveloped agricultural fields located to the south, southwest and southeast of the A14 Junction 24 (Swavesey Interchange). Approximately 8 hectares in the northeast corner of the site has been previously used as a storage compound for vehicles and machinery associated with the A14 Improvement Works and remains cleared comprising hardstanding with a previously developed character. The Site Location is enclosed at Appendix 1.

3.1.2 There are no notable areas of ecology or protected open spaces within the Site. The land is not subject to any site-specific policy in the existing Local Plan. There are no Listed Buildings within or immediately near to the Site, and it is not located within or adjacent to a Conservation Area. There are several mature trees around the site boundaries, with a small area of ancient woodland, located adjacent to the southern edge of the Site. Landscaped bunding exists to the A14 edge, and some hedgerows run north to south which define the field structure. The Site is located within Flood Zone 1.

3.1.3 The Site is bound by Boxworth Road to the east, with the Cambridge Services beyond, which is less than 200m from the site boundary, and within walking distance of all parts of the Site proposed for development. Cambridge Services includes several food and beverage outlets, including M&S; WH-Smith; Costa; Pret; Starbucks; Nando's and several further fast-food outlets.

3.1.4 The village of Boxworth is located approximately 900m to the south, linked via Boxworth Road, which extends on to Elsworth (a further 2km and Cambourne a further 3.5km) via Bockley Road/St Neots Road. Other settlements nearby comprise the following:

- Bar Hill – 3.5km
- Swavesey – 3.25km
- Fenstanton – 5km
- Northstowe & Longstanton – 7.5km
- Willingham – 8km
- Papworth Everard – 10km
- Cambourne, Hardwick & Highfields Codecote – 10km
- St Ives – 11km

3.1.5 The edges of Cambridge are circa 10-11km from the Site, with Huntingdon circa 13.5km and St Neots circa 22km away. All of the above are considered to be within easy commutable distance for potential future employees. The A14 provides wider access to settlements to the east and west, serving as a major arterial strategic route for handling and transportation of goods between the Ports of Felixstowe and Harwich to the east and the Midlands to the west. The A14 links directly to the A1(M) and the M1, enabling unfettered access to all parts of the country via major trunk roads/motorway, making it an ideal location for logistics serving the immediate Greater Cambridge area and the wider country as a whole. The importance of the A14 Corridor is acknowledged in Iceni's 'Greater Cambridge Warehouse and Industrial Space Needs' Report (March 2025).

3.1.6 Access to the A14 for HGV's can be secured in less than 100m from the Site to the westbound slip road of Junction 24, and less than 500m from the eastbound slip road.

3.1.7 Junction 24 is already an established employment/logistics location. On the northern side of the A14 Junction 24 is Buckingway Business Park, an established employment area, which comprises circa 15 hectares of land, occupied by circa 25 industrial buildings, and accessed

via the A1307. To the immediate east of Buckingway Business Park is the Cambridge Swavesey Travelodge Hotel.

3.1.8 An area of Land comprising 2.11 hectares is allocated in the Draft Plan pursuant to Draft Policy S/RRA/BBP for the expansion of Buckingway Business Park. Further, to the immediate east of Boxworth Road, 24.5 hectares of land to the south of the A14 Services (HELAA Ref: 45107) is subject to a draft allocation S/RRA/SCS for up to 90,000 sq. m of B2/B8 floorspace, of which 2.25 hectares is to be a lorry Park (to provide around 150 HGV car parking spaces). Together this would establish circa 50 hectares of employment land immediately around the junction. However, none of the land proposed for expansion under either of these two allocations can access the A14 as directly, or seamlessly/efficiently, as the land proposed at Brickyard Farm.

4 Site Promotion & Pre-Application Engagement

4.1.1 This section summarises the long-term promotion of the Site alongside the development of the GCLP, in parallel with detailed engagement held with the local planning authority and other key stakeholders.

4.2 Initial Site Promotion (2019-2021)

4.2.1 Newlands work on this project commenced in December 2019, with the Site put forward in the GCLP "Call for Sites" consultation for consideration.

4.2.2 As part of the First Proposals Consultation (2021), an initial assessment of the Site was undertaken as part of a HELAA. This assessment identified the Site as available and achievable for significant employment development, though questions were raised regarding its suitability, particularly in relation to Landscape and Transport/Accessibility constraints. These matters were addressed within representations prepared and submitted in response to the First Proposals consultation. It is noted that the 2025 HELAA no longer identifies either as a constraint to development of the Site.

4.2.3 The representations also provided a critical review of the Council's evidence base, identifying that the strategic need for storage and distribution had not been duly considered within the Greater Cambridge Employment Land and Economic Development Evidence Study (2020) prepared to support the First Proposals plan.

4.3 Pre-Application Engagement and further Site Promotion (2023- March 2025 – Call for Sites Consultation)

4.3.1 In parallel with the long-term promotion of the Site as part of the GCLP process, our Client has collaborated closely with Officers to evolve the proposals.

4.3.2 Meetings were held with Stephen Kelly (Joint Director of Planning and Economic Development) and Senior Policy Officers at the Council in February 2023; May and July 2023; and subsequently with Jonathan Dixon (Policy Officer) in September 2024. Helpful feedback was provided by officers, particularly in relation to the quantum of development, landscape and points of visual prominence, where the design approach would be key. The feedback received, and design responses made during this period of pre-application engagement, are summarised within the table below:

Comments Made by Greater Cambridge Shared Planning Service	Updates Made by Newlands and presented to the Greater Cambridge Shared Planning Service
Review the quantum of development with particular regard to the landscape and visual impact of the development	• A more detailed landscape and visual analysis was undertaken by Stantec to retain existing hedgerows and inform a more sympathetic, landscape-led approach to the masterplanning of the Site. • Development parameters refined (reduced from previous 251,000 sq m) as a direct response to the Site's landscape opportunities and constraints, to protect key ecological features, high category trees and hedgerows. • Restriction on zonal maximum ridge heights to 21m AOD. • Provide an enhanced on-site integrated and accessible landscaped parkland for employees' benefit. • An updated Landscape & Visual Analysis was provided to Officers in July 2023

Comments Made by Greater Cambridge Shared Planning Service	Updates Made by Newlands and presented to the Greater Cambridge Shared Planning Service
Consider the sense of arrival for users of the A14 travelling eastwards to create an appropriate 'Gateway' for Cambridge	• Edge of the development area scaled back by 250m to create a more compact site around Junction 24. • Introduction of strategic landscape bunding along the A14 for screening/filtering purposes, particularly on A14 approach from the west. • A commitment to deliver a gateway frontage to provide a strong sense of arrival into Cambridge.
Undertake further analysis to understand how the type of jobs created align with the local demographics	• GPS data used to obtain a deeper understanding of labour trends in the Greater Cambridge area. Strong conclusions drawn from the analysis identified a large prospective labour pool with potential to reduce commuter distances, strongly supporting the case for allocation of this site. • Quantification of the scheme benefits to Greater Cambridge and mapping to show who will benefit from these. • Working alongside Social Value Partner, Fusion 21, a Construction Phase Social Value Framework was prepared as the first step in generating significant localised social value.
Demonstrate how those likely to be employed at the development have opportunities to access it via sustainable transport modes	• A commitment to develop a Sustainable Accessibility Strategy, tailored towards prospective workers so they can access the site via sustainable transport modes, including potential proposed Shuttle Bus and Cycle route enhancement. • Electric Vehicle Charging infrastructure with E-bike provision at an Amenity Hub. • Further labour analysis information explaining the type and range of jobs associated with Logistics development, and the potential location of where people employed by the development may physically reside from (travel patterns and local demographics), were provided to Officers in July 2023.
Demonstrate measures that will be put in place to ensure the development minimises energy and water usage whilst incorporating sustainable drainage	• An updated SUDS Strategy was prepared around a monitor and manage approach and to demonstrate sufficient capacity on-site to accommodate flood events and manage release of water back into the drainage system. • Material provided to demonstrate low water usage of Logistics schemes, with rainwater and grey-water harvesting embedded in the design. • In response to the Environment Agency and Local Lead Flood Authority, consideration of potential wider catchment issues and constraints, including Webb's Hole Sluice • Further information provided on the scheme's green credentials to reinforce our commitment to environmental responsibility and transition to Net Zero.

4.3.3 Further requests for meetings with Senior Officers were made throughout the remainder of 2023 and into 2024, with the aim of maintaining a collaborative approach with the Council, to inform the continued evolution of the proposals. The response to such requests stressed that the Council was focused on updating the Evidence Base associated with the emerging Local Plan and would not wish to prejudice that process.

4.3.4 Helpfully, a meeting was held with Jonathan Dixon, Planning Policy Manager at the Council and Cllr McDonald (Cabinet Member for Economic Development) on 26 November 2024 to explain the proposed development.

4.3.5 The work undertaken in this period culminated in an updated submission made to the Greater Cambridge Local Plan: Site Submissions Update in March 2025 (Site Reference: 47353). This

was informed by additional technical information captured within the submitted Vision Document and followed the above positive engagement with Senior Officers at the Council.

4.3.6 The key amendment presented in the Greater Cambridge Local Plan: Site Submission Update in March 2025 was a reduction in the quantum of development proposed for B8 (Storage and Distribution) from 251,000m^2 to 150,000m^2.

4.3.7 This amendment was informed by discussions with senior officers. It was a direct response to the updated evidence on need arising from the Iceni (March 2025) employment assessment (which increased the quantum of B2/B8 need from 150,000m^2 to 317,000m^2), as such enabling Greater Cambridge to 'fill or plug' the difference between the assessments with one single allocation. The quantum of floorspace proposed and any alignment to the need identified in Iceni's own assessment did not alter our client's position relating to the quantum of floorspace to be delivered by the Plan or the need to provide for strategic and local need.

4.3.8 The subsequent layout flowed from direct consultation with the Local Lead Flood Authority, and the Environment Agency, and from further work undertaken by Stantec landscape consultants to produce a landscape-led approach, driven by visual analysis that could accommodate a greater quantum of green and blue infrastructure/ open space, to serve a development area of 150,000m^2.

4.4 Public Consultation

4.4.1 To support the continued promotion of the development proposals, and the preparation of a future planning application, a programme of public consultation with local stakeholders culminated in a series of public consultation events held between June and July 2025 in Boxworth, Swavesey and Bar Hill.

4.4.2 These events, alongside further meetings with Boxworth and Swavesey Parish Councils in December 2025, identified that residents are supportive of the creation of new jobs, the potential to improve the cycleway/footpath to Boxworth and the development's net zero carbon credentials.

4.4.3 Residents expressed reservations with the following issues:

- Additional traffic, when combined with existing, resulting in delays for residents accessing the A14 from Boxworth Road.
- Questioned why access could not be taken direct from the Junction as opposed to from Boxworth Road
- Concerns over HGV parking in the wider area and safety issues of further HGV's using the Boxworth Road/A14 Services junction
- Access via non-car modes, and concerns over peak hour traffic.
- Potential flood risk in Swavesey via the Swavesey Drain.
- Landscape & Visual Impact & concerns over quality of landscaping pursuant to A14 works
- The site should be renamed from 'Boxworth Gateway'.

4.4.4 Given the strength of concern raised by Boxworth Parish, in response, the applicant committed to reviewing the potential to re-locate the access from Boxworth Road. An alternative access, which would be facilitated by an additional arm off the southern dumbbell of Junction 25 was presented to the County Council & National Highways in October 2025, and was supported in principle, subject to detailed design. Officers confirmed that this would provide HGV's with far more direct access onto the A14, and significantly reduce the potential impact upon traffic using the Boxworth Road/A14 Services junction compared to the previous proposal. They also noted the potential to facilitate dedicated direct access for cyclists into the wider network, and to provide for/facilitate an enhanced cycle connection to Boxworth Village. The revised proposals were seen, in their view, as an improvement compared to those that were consulted upon.

4.4.5 The forthcoming Transport Assessment and Travel Plan will comprehensively set out the trip generation associated with the development, and identify opportunities to maximise access to the Site via non-car modes, such as the proposed shuttle bus network and enhancements to local cycle and footpath connectivity.

4.4.6 Additionally, and in direct response to concerns raised by Swavesey Parish, a meeting was held with the IDB regarding the Swavesey Drain in August 2025. Amendments to the scheme have now ensured greater storage capacity to ensure the development will have no further impact on the Webbs Sluice drain, whilst further discussions are ongoing with the IDB to consider how the development could offer a direct enhancement to the drain.

4.4.7 The proposed development has also been rebranded and renamed to Newlands Park Cambridge to remove any association with Boxworth, as requested by local residents.

4.4.8 Further consultation events are scheduled in Boxworth, Swavesey and Bar Hill in February 2026, to present the changes to the proposals introduced following feedback received at the community consultation events, and following engagement with the local planning authority and other stakeholders (see below).

4.5 EIA Scoping Opinion (July 2025)

4.5.1 To inform the preparation of a planning application, an EIA Scoping Request was submitted to the Council in June 2025. The proposed development exceeds the applicable screening thresholds at Schedule 2, 10(a) of the Regulations (as amended), so the Council confirmed and agreed that the proposals constitute EIA development.

4.5.2 The following topics have been scoped into the Environmental Statement required to support a planning application:

- **Transport and Access**: As part of the scoping request, the principle of the trip generation methodology was agreed with National Highways. Full vehicular trip generation and distribution information will be provided as part of an EIA, with the data mirrored within the accompanying Transport Assessment for consistency, as noted with the Local Highway Authority's consultation response to the scoping request.

- **Noise and Vibration**: The Council confirmed that this Chapter should focus on Noise, and that a noise survey should be undertaken and extended over a three-day period, including part of a weekend. The Council also confirmed that operational and construction phase vibration impacts may be scoped out of the ES.

- **Landscape and Visual Effects**: The scoping opinion outlined that a ZTV diagram would be required with a planning application, alongside additional viewpoints and receptors to be agreed with the Council. This has duly been undertaken through the corresponding PPA workshop session.

- **Ecology**: Ecological impacts are scoped into the ES, while updated information regarding relevant protected species, including Great Crested Newts, birds and bats, will be incorporated within the planning submission.

- **Air Quality**: The application will be accompanied by a Low Emissions Strategy and a Dust Control Risk Assessment, alongside the ES Chapter.

- **Soil Resources and Agricultural Land**: This will contain an assessment of the degree to which soils would be disturbed or damaged as part of the development, alongside an Agricultural Land Quality assessment.

- **Flood Risk and Drainage**: A site-specific Flood Risk Assessment and Water Resources Assessment will inform this Chapter.

- **Historic Environment**: This Chapter will address any impacts upon built and below-ground heritage.

- **Socio-Economics**: This Chapter will provide a detailed analysis of the socio-economic impacts of the development, including evidence to demonstrate that the operational workforce would primarily be drawn from the local labour market.

- **Climate Change**: This Chapter will analyse the carbon footprint of the proposed development, alongside the impacts of climate change upon the development itself. Consideration will be given to journey emissions during the construction and operational phases of the development.

- **Cumulative Effects**: This Chapter will analyse the cumulative impact of existing and emerging projects with the proposed development. The ES will also include an assessment of reasonable alternative sites.

4.6 PPA & Further Officer Engagement

4.6.1 In July 2025, Newlands entered into a Planning Performance Agreement (PPA) with the Council to formally continue pre-application engagement, with a view to a planning submission. This followed a period of public consultation, as detailed within this Section. The PPA structured a further programme of pre-application meetings and discussions, as follows:

- **20 October 2025:** This meeting provided an opportunity to comprehensively reintroduce the proposals to Officers, and to update on the feedback received during the public consultation events held in June and July 2025. The key design moves introduced since the previous pre-application engagement in 2023, such as the relocation of the primary access to a more central location directly off the southern dumbbell of Junction 24, were supported. Detailed feedback regarding the principle of development, in relation to Policies E/11, S/7 and the emerging Local Plan was received, alongside valuable inputs regarding the proposed design approach and validation requirements.
- **12 November 2025:** The project team delivered a Member's Briefing, to present the proposals to Members and receive initial feedback.
- **17 November 2025:** Spatial Layout & Key Principles Workshop with Landscape, heritage, Sustainability, Planning, Urban Design Officers. Feedback focused on the landscape/visual impact of the development, with queries relating to separation between buildings, extent of hardstanding, and proximity of development to Boxworth Road. Additional views related to heritage features were noted, and requests were made to demonstrate the potential future environment for pedestrians and cyclists, including separation from vehicles, as well as enhanced access to the A14 services via a dedicated crossing.
- **24 November 2025:** Movement, Connectivity & Access Workshop with County Highways, Planning & Urban Design officers. Focus was on facilitating greater access to the Site via Active Travel and/or non-car modes, whilst the County Council confirmed their preference for the revised access arrangement and confirmed the significant positive impact this would have vs the previous proposed arrangement off Boxworth Road. Requests for parking ratios were made alongside a request for an enhanced pedestrian crossing to the A14 Services, and a request to provide some additional parking for HGV's given constraints at Cambridge Services.
- **27 November 2025:** Workshop held with Planning & Ecology Officers and LLFA to introduce and receive feedback on the proposed surface water drainage management regime, which was supported 'in principle' by officers, who also confirmed that a sequential test would not be required. It was acknowledged that key trees and ecological features had been protected in the proposals, which was welcomed. Detailed landscape treatment to SUDS features was sought in the future application, as well as further info on how a welcome 25% BNG would be achieved.
- **9th December 2025:** Sustainability Workshop. Significant support was provided by officers to the proposals which will ensure a minimum BREEAM Excellent is achieved, and the strategy towards achieving zero carbon, and how this could provide a benchmark for future forms of development. It was acknowledged that water usage associated with the use could be minimised, and that all BREEAM WAT 01 Credits would be achieved with further reductions to water usage achieved through rainwater, greywater harvesting and low usage hardware.

- **21 January 2026;** Scheme Review (following Workshops) Pre-App 2: Various updates were presented to show how the scheme responded to points made through the consultation – notably restrictive zones included on the Parameters Plan to pull the facing elevations of any proposed units away from Boxworth Road (circa 80-85m), various Sections through the Site demonstrating separation between buildings, and the inclusion of a 60 space Lorry Park on the Parameters Plan. It was confirmed that the scheme was not anticipated to have any heritage impacts and addressed the adopted Local Plan and emerging policies of the Draft Local Plan, in respect of sustainability and biodiversity. Feedback from officers was positive, stressing that the scheme had evolved well. It was agreed that a further workshop would be arranged to discuss the Design Code, particularly landscaping within areas of public realm prior to submission of an application. It was acknowledged that Plot coverage allowed for car parking, servicing and built form, that would enable space for structural landscaping defined on a Green Infrastructure Parameter Plan; and additional trees, hedges and soft landscaping within the plots, that can be guided by a Design Code that would inform future Reserved Matters applications.

4.6.2 This sustained process of pre-application engagement has facilitated the continued evolution and refinement of the proposed development. Key moves undertaken, and reflected in the Opportunity Document which accompanies these representations, resulting through the Pre-App process, have been:

- Confirmed re-location of the access – in direct response to concerns of Boxworth Residents
- Completion of a ZTV to account for additional views requested by Landscape/Heritage officers & Boxworth Parish
- Addition of dedicated area for 60 HGV Parking Bays and associated toilets/shower/amenity facilities in the Northeast corner of Site
- Potential to provide additional benefit of enhanced structural planting needed for mitigation in a Green Infrastructure Parameter Plan, and to provide further details of on-plot landscaping, and the nature of pedestrian/cycle routes through further work on the Design Code
- Reduction in building heights to a maximum ridge height of 21m AOD with separation between buildings ranging from 35–70m.
- Introduction of a no-build zone/height restricted zone (<5m) on the eastern edge facing Boxworth Road meaning a set-back of main building elevations by at least 85m from that edge.
- Indicative location of the proposed pedestrian crossing over Boxworth Road to provide a direct link to A14 Services
- Larger, more-centralised and directly accessible Community Hub, to enable quick access by all staff using non-car modes.
- Masterplan updated to reflect greater potential for access, movement and circulation by non-car modes.

4.7 Additional Engagement

4.7.1 The applicant has also engaged with the following key groups/stakeholders, to receive feedback to assist the evolution of the proposals:

- **April 2024**: Meeting held with the Cambridgeshire Chamber of Commerce and Anthony Brown MP.
- **May 2024**: Meeting held with the Cambridge Delivery Group.
- **July 2025**: Meeting held with the CPCA and the Mayor of Cambridgeshire and Peterborough.
- **October 2025**: Meeting with Ian Sollom MP
- **January 2026**: Meeting held with the Cambridgeshire Chamber of Commerce and Cambridgeshire County Design Quality Review Panel.

4.8 HELAA Assessment (October 2025)

4.8.1 In response to the submission made as part of the Greater Cambridge Local Plan: Site Submissions Update in March 2025 (Site Reference: 47353), an updated HELAA Assessment of the site was released as part of the ongoing Regulation 18 Draft Local Plan consultation in December 2025.

4.8.2 The HELAA highlights areas for further technical consideration (Amber) which will be progressed as part of ongoing engagement with the Council as part of the Planning Performance Agreement process. These elements are summarised below:

HELAA Topic	RAG Rating and LPA Comments	Response
Adopted Development Plan Policies	Amber: Development introduces some policy conflicts which could be overcome through a planning application.	Any departure from the Development Plan will be robustly addressed and justified within a planning application – with a focus on how the proposal will help address both local and strategic employment needs.
Flood Risk Assessment	Amber: The site is wholly in Flood Zone 1, with 8% of the site lying within a 1 in 30 year surface water flooding event, 6% in a 1 in 100 year event and 10% in a 1 in 1,000 year event.	The proposed development has been designed to omit built form from limited areas of surface water flood risk.
Landscape Assessment	Amber: The preliminary Landscape and Visual Impact Assessment and Vision Document submitted in March 2025 details how the scale of development could be integrated into the site, though further mitigation details and a full LVIA will be required to support the development.	The proposals are landscape-led and several key amendments have been made through the PPA process to address Landscape & Visual Impact, including a ZTV accounting for additional views agreed with Landscape officers. A full LVIA, and corresponding detailed landscape mitigation measures, will be factored into a planning application.
Biodiversity and Geodiversity	Amber: Further information regarding protected species would be required as part of a planning application.	Detailed protected species information will be provided with a planning application, but has been discussed and presented with officers through the PPA process to highlight protection of existing species, while the proposed development seeks to deliver biodiversity net gain in excess of 10% (targeting 25%)
Policy Officer (2021)	Green: The site is not located within protected open space.	No comment.
Historic Environment (2021)	Green: Development of the site would not have a detrimental impact upon any designated or non-designated heritage assets.	No comment.
Archaeology	Red: Updates to the Historic Environment Record since	A geophysical survey has been undertaken to

HELAA Topic	RAG Rating and LPA Comments	Response
	the previous 2023 assessment have identified a linear pattern within the development site, likely dating from the middle Iron Age. Further information would be required to assess the significance of this feature.	ascertain archaeological significance, which is identified to be of no more than regional significance. It has been agreed with CHET, that any archaeological potential can be realised through a programme of archaeological excavation, recording, and dissemination, which could be secured by an appropriately worded planning condition.
Accessibility	Amber: Well-related to transport infrastructure, and the development would not require delivery of accompanying key services.	The development is ideally suited within the A14 corridor and will have immediate access for HGV's (a key driver for Logistics) directly onto the A14. The proposals have been updated to directly connect into existing cycle and pedestrian routes, and will facilitate enhanced cycle access to Boxworth village. Further direct interventions to enhance accessibility to transport nodes and settlements within the catchment will be detailed through the Transport Assessment.
Site Access	Amber: Access to the site is deliverable, subject to detailed design.	The proposed site access has been relocated within the latest design proposals to a more central location, in line with pre-application engagement undertaken with National Highways and the local Highway Authority.
Transport and Roads	Amber: The site is considered to be remote from existing public transport links, and will require a high quality passenger transport link to Cambridge and local non motorised user facilities, like the existing A1307 cycleway. The site will potentially impact on the A14 and associated junctions, so a Travel Plan will be required.	A detailed Transport Assessment and Travel Plan are being prepared to support a planning application, while Transport and Access is a topic for assessment within the Environmental Statement. Notably, Annex 2 of the 2025 HELAA states that the A14 West network (Junctions 24 (Swavesey)

HELAA Topic	RAG Rating and LPA Comments	Response
		and 25 (Bar Hill)) have capacity to accommodate some growth, leading to a 'Green' rating. The planning application will be supported by a robust analysis of transport to and from the Site, while opportunities to maximise active travel and public transport will be incorporated into the proposals. For example, provision will be made for dedicated shuttle buses to residential areas and park & ride sites, and provide cycle linkages to the existing facilities at the A14 Cambridge Services roundabout.
Noise, Vibration, Odour and Light	Amber: The Site will be impacted by road traffic noise, which can be mitigated through development.	Noise matters will be assessed as part of the Environmental Statement.
Air Quality	Amber: The Site lies beyond an AQMA, though mitigation would be required to minimise air pollution as part of a planning application.	Air quality matters have been scoped into the Environmental Statement.
Contaminated Land	Amber: Planning conditions would be required to assess any potential contamination impacts given the presence of a former landfill site to the south of the site.	The proposed masterplan seeks to concentrate built form to the north of the site, with the southern portion envisaged as parkland. In any event, any contamination will be identified and robustly remediated.

4.8.3 From the above, it is apparent that the proposed development can overcome those 'Amber' constraints as part of a detailed development proposal. The 'Red' item regarding Archaeology is being robustly investigated, and it is not considered that this constraint would preclude the delivery of the development proposals.

4.9 Summary

4.9.1 The proposed development has been the subject of a detailed programme of consultation and engagement with the local planning authority and other key stakeholders. This engagement has enabled the scheme to evolve in a considered manner, in line with feedback received.

4.9.2 The comprehensive promotion of the site, in parallel with this engagement with key stakeholders, has also contributed to the iterative progression of proposals which can address the identified constraints through a planning application.

5 Site Opportunities and Constraints

5.1.1 This section assesses the Site opportunities and constraints based on evidence gathered to date.

5.2 Principle of Development

5.2.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 sets out that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

5.2.2 The policies of the adopted South Cambridgeshire Local Plan (2018), particularly those relating to provision of land for employment uses/economic development, are considered to be out of date and contrary to both the December 2024 NPPF and the Draft December 2025 NPPF, most pertinently Policy E/11, which resists large-scale warehousing and distribution centres in the District.

5.2.3 The Council's own evidence base identifies a need for 317,000 sq m of B2/B8 floorspace. However, as set out in Chapter 6 of these representations, we believe the quantum identified is insufficient to address local and strategic employment need. Accordingly, it is considered that the Draft Policy S/JH is inconsistent with both the 2024 and 2025 versions of the NPPF, and that no weight can be given at this stage to that policy, or the Draft Allocations proposed to meet the identified need.

5.2.4 Paragraph 32 of the 2024 NPPF states that the preparation and review of all Local Plan policies should be underpinned by relevant and up-to-date evidence, taking into account relevant market signals. Paragraph 86(b) requires Local Authorities to set criteria, and identify strategic sites, to meet anticipated needs over the plan period, and Paragraph 86(c) states that planning policies should pay particular regard to facilitating development to meet the needs of a modern economy that includes freight and logistics. Similarly, Paragraph 87 sets out planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for b) 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 decarbonization. Neither the adopted policies of the 2018 Local Plan, nor Draft Policy S/JH and the accompanying site allocations set out in the Draft Regulation 18 GCLP are in accordance with these key sections of the 2024 NPPF, which are considered fundamental tenets to how employment and logistics should be planned for.

5.2.5 The Housing & Economic Needs Planning Practice Guidance (PPG) highlights that Authorities need to prepare robust evidence of existing business needs, and carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area. There is no evidence of such cross-boundary assessment within the Draft Regulation 18 GCLP.

5.2.6 Further, the PPG requires account to be given to market signals including the availability, loss and take up of existing stock, evidence of market demand, take-up of space, drawing comparisons between available and particular requirements so that 'gaps' in local employment land provision can be identified. There are no buildings available within the Greater Cambridge area of 100,000 sq ft (the threshold proposed in the Draft Local Plan) and above, yet extensive demand for them, so any policy restricting the size of units to below this threshold is contrary to the PPG.

5.2.7 Given the critical role afforded to logistics, as referenced in the PPG, their distinct locational requirements need to be considered in formulating planning policies. Policies must account for the land take, power and access to the strategic transport network, when determining allocations, and again, as highlighted in Chapter 6 of these representations, due regard has not been had to either market signals or operator requirements when formulating policies that guide the quantum or location of logistics development in the Draft Regulation 18 GCLP.

5.2.8 Due to the lack of compliance, consistent with Draft Policy DM4 of the 2025 NPPF, Policy S/JH and the associated site allocations for employment development set out in the Regulation 18 Draft GCLP, should be given limited weight.

5.2.9 Notwithstanding the above, the Council's own evidence base, prepared by Iceni Projects, recognises Junction 24 at the A14 provides the optimum location for meeting business-to-business and business-to-consumer deliveries. The Council's own Topic Paper identifies the Junction 24 as having capacity to support economic growth. However, at present, there is not a single available unit of 100,000 sq. ft or more available in Greater Cambridge that would be suitable for a B8 use. Accordingly, there are no alternatives available, and supply is being stifled, which is contrary to national planning policy, impacting on the Government's commitment to economic growth.

5.2.10 The Site is located within the SCDC boundary as identified on the current polices map. It is an ideal location to accommodate logistics units, as shown in the accompanying Opportunity Document. As flagged in Chapter 3 of these representations, Junction 24 is already viewed as a suitable location for logistics space and HGV movements, and the proposal offers the opportunity to further cluster logistics uses, consistent with Paragraph 87 of the 2024 NPPF and PPG.

5.2.11 The benefits of clustering are recognised in the National Planning Practice Guidance as playing an important role in supporting collaboration, innovation, productivity, and sustainability, and is supported by both the National Infrastructure Commission (NIC) and UK Innovator Corridor (UKIC).

5.2.12 Part of the Site has previously been used as a compound for the storage and distribution of vehicles and materials associated with the previous upgrades to the A14. The Site is situated adjacent to Junction 24 of the A14, where development in the form of the A14 Services, and the Buckingway Business Park Industrial Estate have already established an urbanizing/industrial presence to the northeast and southeast. High numbers of HGV's use Junction 24 and pass through the southern dumbbell towards the Boxworth Road junction to access the A14 Services, which has a large number of HGV parking spaces, used by drivers for overnight facilities and breaks.

5.2.13 The land to the immediate southeast of the Site, on the opposite side of Boxworth Road, has been allocated in the Draft GCLP (HELAA Ref: 45107) for up to 90,000 sq. m of B2/B8 floorspace, whilst a further parcel of land at Buckingway Business Park has also been allocated in the Draft Local Plan. This serves to highlight that the area around Junction 24 is considered an appropriate location for logistics use.

5.2.14 The Site would allow almost immediate, and unrestricted access direct to the A14, unique when compared to other locations, including those referenced above, allowing access for large HGV's to access the wider strategic highway network, without impacting on local traffic flows which, consistent with the Department for Transport's Future of Freight publication (2022), should be a key determining factor when allocating land and supporting planning applications for logistics uses:

The plan will… ensure that the planning system provides appropriate support to enable logistics developers seeking to grow operations in all regions of the country to locate them where they need to be – near to the strategic road and rail network and close to an employment market. (DfT, Future for Freight, Paragraph 2.14, 2022).

5.2.15 Recent appeal decisions have reflected this, with the allowed appeal for a 140,000sqm logistics park in Cherwell (ref: APP/C3105/W/24/3352512) accepting that storage and distribution facilities must be sited close to the strategic road network.

5.2.16 Specifically, Paragraph 28 of the Appeal states that the "Framework (NPPF) makes it clear that planning decisions should recognise and address the specific locational requirements of different sectors. In particular, this includes making specific provision for storage and distribution operations that allow for the efficient and reliable handling of goods". Further, the

Inspector concluded that *"the operational need for the development to be close to the motorway....outweighs the disadvantages of the site's accessibility".*

5.2.17 Work undertaken by CBRE has identified a potential labour pool of circa 30,000 employees within a 25-minute catchment. The Site is considered to represent a sustainable location to enable access for employees, with dedicated cycle links to nearby villages, and potential to enhance public transport or provide direct access via private shuttles to nearby public transport nodes, such as Park & Ride/Guided Busway facilities, local villages, west Cambridge, Cambourne and the future East West Rail station planned at Cambourne.

5.2.18 The principle of logistics development is considered acceptable in this location. The policies of the adopted Local Plan are considered out of date, and as emphasised in Draft Policy DM4 of the 2025 NPPF, the employment policies of the Regulation 18 Draft GCLP should be given no weight. Whilst acknowledged that Draft Policy S5 of the 2025 NPPF is a 'National Decision Making Policy', it provides some useful indicators around how major storage and distribution can be assessed as being acceptable subject to there being an evidenced unmet need (which there is) and where it would accord with Draft Policy E3.

5.2.19 Draft Policy E3 of the 2025 NPPF highlights the following criteria that applies:

- Good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;
- Sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required; and
- Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use.

5.2.20 The proposals set out in the accompanying Opportunity Document include provision for HGV's. Further, and as highlighted in the appended Transport Note prepared by Stantec (Appendix 4), the Site is within 100m of the strategic transport network, providing direct access to the A14. Second, the Site is located more than 750m from the nearest residential property, supporting a 24hr use, necessary for logistics, and located around a junction that is already associated with logistics uses at Buckingway Business Park, identified within the Council's own evidence base as an appropriate location for Logistics use. As highlighted in the previous chapter, and below, through extensive public consultation, and through the PPA process, the form of development has evolved to a point where it is considered (as noted in the 2025 HELAA) that the impact of development can be mitigated.

5.3 Flood Risk & Water Resources

5.3.1 According to Environmental Agency mapping of fluvial flooding (from rivers and the sea), the majority of the Site is located within Flood Zone 1, the lowest risk from flooding. In terms of surface water flooding, 2% of the Site lies in a 1 in 30-year event, 5% lies in a 1 in 100-year event and 20% lies in a 1 in 1000-year event. As such, flood risk at the Site is predominantly at low and very low risk of surface water flooding. Groundwater and reservoir flooding is considered unlikely.

5.3.2 Notwithstanding, all built development will be located outside of areas at high risk of surface water flooding, whilst areas of appropriate surface water attenuation have been accounted for in the Masterplan. If required, the Site will be supported by embedded mitigation to address flood risk considerations within the proposed development. Further consultation is also being undertaken to inform the production of the future Flood Risk Assessment for the Site following engagement with the EA, Swavesey Internal Drainage Board (IDB), SCDC and the Lead Local Flood Authority. The risk to flooding is low and adequate attenuation can be accommodated

on site.

5.3.3 It should be noted that the development is being designed to enable the possibility of providing an on-site Water/Waste recycling facility, given the lack of capacity identified by Anglian Water.

5.3.4 The proposal will be supported by a Flood Risk Assessment, Drainage Strategy and Water Cycle Assessment to demonstrate the proposal will be safe for its lifetime and not increase flood risk elsewhere in accordance with policies CC/8 and CC/9 of the SCLP 2018 and NPPF 2024.

5.3.5 Further, work was presented to Senior Officers in 2023 and 2024 to demonstrate how water usage can be minimised within the day-to-day operation of logistics uses. The usage per sq. m is a fraction of other commercial uses. Further detail shall be provided to this effect in support of a planning application.

5.4 Archaeology and Built Heritage

5.4.1 There are no Listed Buildings within or immediately adjacent to the Site. Notwithstanding, a number of additional views from nearby churchyards (agreed in consultation with the Authority's Conservation Officer) are being assessed.

5.4.2 Policies in the Regulation 18 Local Plan align heritage protection with good design, ensuring the preservation of heritage through the provision of high-quality design.

5.4.3 Newlands will ensure that high-quality design is integrated into the development from the start. The layout and built form of the development on the Site and the Opportunity Document submitted alongside these representations is landscape-led and informed by a ZTV assessing a series of views agreed with Landscape Officers.

5.4.4 RPS Tetratech has produced a Technical Note appended to these representations to highlight that, based on extensive trial trenching near to the Site and geophysical surveying undertaken in August 2022, it is concluded that the likely archaeological significance of any remains on Site is no more than regional. They highlight that a programme of trial trenching has already been agreed with the archaeological advisors at CHET, and that any archaeological remains within the site which are threatened by the development can be realised through a programme of archaeological excavation, recording, and dissemination. This can be secured by an appropriately worded planning condition.

5.4.5 A future application will include a Historic Environment Chapter within the Environmental Statement (as per the agreed ES Scoping response) which will identify the anticipated scale of the harm and how it could be mitigated by high quality design, appropriate building heights and strategic landscaping. It is anticipated that any small-scale residual harm would be outweighed by the substantial public benefits associated with the development.

5.4.6 Future proposals will therefore respond well to draft policies of the Local Plan which requires the design of development to respect and enhance its setting with regards to heritage assets.

5.5 Landscape and Visual

5.5.1 In 2023 Stantec produced a Landscape & Visual Options Analysis to define the landscape strategy as shown on the Illustrative Masterplan. The following key factors have informed the design:

- The eastern extent of the Site is the lowest-lying and relates most strongly to the built form at Cambridge Services and Buckingway Business Park, including the A14 interchange.
- The embankments and recent highway planting associated with the A14 can provide physical and visual enclosure, particularly the lower levels of the proposal.

- The edges of the developable area (within the eastern extents) require a more sensitive treatment to reduce the effect on the landscape character and wider context to the south of the A14 and bridleways to the south-west and south-east.

- Recessive colouration of the facades and considered articulation of the roofscape will help to limit the landscape and visual effects.

- The existing tree belt and woodland vegetation in the context of the Site is important and the proposed structural vegetation will help to soften the lower sections in near distance views from the bridleway to the south-west and from Boxworth Road along the south-eastern site boundary, improving the approach to the village. This will reinforce the green infrastructure of the locality, alongside the provision of 'green corridors' and biodiversity enhancements, as well as respecting the historic field pattern.

- The Landscape strategy retains all of the existing structural vegetation within the Site and along the boundaries, and will retain and reinforce the hedgerows apart from the proportion removed to provide access.

- Strategic and sympathetic bunding is proposed to the north-western, western and southern boundaries of the Site, which softens the proposal in key views, and screens the lower levels from the west along the A14.

5.5.2 The current Landscape Policy, in the South Cambridgeshire Local Plan (2018) and published landscape character guidance does not identify the landscape as being of high sensitivity. Further, through the provision of a landscaped bund to the A14 and setting development back from the southern portion of the Site and Boxworth Road via a no-build area/setback of approximately 80m, the proposal can integrate well through this landscape-led approach. As such, its landscape and visual impact is considered to be acceptable in accordance with policy NH/2 of the SCLP 2018, the Draft Policies of the Regulation 18 Local Plan and the NPPF 2024.

5.6 Ecology and BNG

5.6.1 Newlands appointed Ecology Solutions to undertake an initial Ecological Appraisal of the Site. Ecology Solutions have undertaken regular surveys to assess the Site's ongoing potential for protected species. Mitigation strategies for protected species have been factored into the Masterplan to ensure no significant adverse effect on the notable habitats and protected species identified. Further, a biodiversity net gain assessment has been undertaken by Ecology Solutions which demonstrated options as to how the Site could achieve a 25% net gain. These were presented to officers during the aforementioned site promotion, and the commitment remains to meet this aspirational target, which was well received by officers during the PPA process. This clearly exceeds the requirements set out in the Environment Act 2021 and the adopted South Cambridgeshire Local Plan. It also exceeds the 20% target for major development set out in the Draft Regulation 18 GCLP. Therefore, the proposed development can accord with policy NH/4 of the SCLP 2018, NPPF 2024, the Environment Act 2021, and the targets of the Draft Cambridge Local Plan.

5.7 Transport

5.7.1 It is important to note that the Topic Papers advising the Draft Local Plan identify capacity at Junction 24 and assess it as 'Green'. The accompanying Transport Note, prepared by Stantec and provided at Appendix 4, highlights that the site access is 50m from the westbound A14 and 400m from the eastbound A14. This means that HGV's can reach the SRN (A14) in 10 seconds (westbound) and 30 seconds (eastbound). This proximity limits travel time and impact of larger vehicles upon the local road network and minimises local congestion which has been recorded at both Junction 24 and Junction 25 in peak times. The time to access the SRN and distance compares favorably to all three other draft allocated sites.

5.7.2 Further, the proposals have also been subject to extensive discussions with National Highways and Cambridgeshire County Council (CCC) as Highway Authority. A Transport Scoping Note

Report was prepared by Stantec dated 18 October 2022 in support of the proposed development, pursuant to a Transport Scoping Meeting on 11 October 2022 with Newlands, CCC, National Highways and Stantec. This was developed further with a technical note dated 27 January 2023 setting out Stantec's response to a pre-application response received from CCC dated 20 January 2023.

5.7.3 A further meeting was held on 14 May 2025 with NH and CCC and it has been agreed the assessment will follow a manual approach, using traffic survey data, and applying TEMPro Growth Factors and committed developments flows up to a future year scenario of 2039. In scoping, CCC and NH confirmed that the future year assessments should be the anticipated opening year (assumed at the time to be 2029) and 10 years following. A comprehensive traffic count data collection exercise was undertaken in June 2025 to obtain junction turning and link count flows throughout the study area.

5.7.4 The access has since been moved, with a new arm proposed off the southern dumbbell of the Junction 24 Swavesey Interchange that will provide vehicular access into the heart of the Site. The rationale for this amendment is explained in the previous chapter, but was presented to NH and CCC in October 2025. The re-location of the access was supported by officers. A key reason for this was that it will mean that HGV's and employees traffic associated with the development, will no longer have to travel onto Boxworth Road, or maneuver around the roundabout to the east serving the A14 Services and Boxworth Road.

5.7.5 It reduces the distance travelled by vehicles entering the Site by more than 750m in each direction, and significantly reduces the impact of traffic entering and exiting Boxworth Road, particularly at peak times, which is documented to be subject to congestion. HGV's would be able to immediately access the A14 westbound without inhibiting the flow of traffic from Boxworth, minimising the distance travelled on local roads. As highlighted in the Planning Practice Guide, this should be a key determining factor when assessing the location for Logistics development.

5.7.6 Further, the location of the Swavesey Junction is ideal for logistics in that it can intercept eastbound and non-workforce-related traffic in the AM peak before it reaches the higher levels of congestion around Cambridge. Conversely, in the PM peak, westbound traffic would be joining the A14 outside of the urban areas and points of greatest congestion. Similarly westbound traffic coming from Cambridge's urban area in the AM peak and travelling back in the PM peak would be in the opposite direction to the peak flows. It thus offers an excellent location to minimise the effect of road-borne traffic. This is particularly relevant to Cambridge as it directs the impact of air quality and congestion from freight away from the Cambridge conurbation and its surrounds, that suffer from air quality and congestion issues. This contrasts with the situationone further junction down at Bar Hill, where there is an established residential population both adjacent to the Junction and expanding to the north associated with Northstowe.

5.7.7 The Opportunity Document submitted in support of these representations highlights the Site's strategic location and how it will enable sustainable journeys and enhance accessibility. Of particular note, the development offers the potential to contribute to, or deliver part of the Boxworth Road Link (which we understand is subject to a Feasibility Study) or help fund part of the Bar Hill to Longstanton route, where there is currently a funding gap. These two items were part of the discussion held with the County Highways Authority and National Highways on 14th May 2025.

5.7.8 Other possible means of mitigation that can enhance access via active travel include:

- Dedicated pedestrian and cycle links running through the development linking to existing wider cycle routes and connecting the amenity hub directly to each plot;
- E-bikes provided in suitable locations near to the Amenity Hub;
- A new, high quality community hub (potential for e-bike station, a café, a subsidised nursery/ creche and gym);

- Dedicated shuttle bus services between the Site and Longstanton Park and Ride, travelling via the Northstowe development.

- Dedicated shuttle bus services between the Site and other Public Transport Nodes and settlements, including Cambourne, St Ives.

5.7.9 It is considered the proposed access and sustainable transport measures will enable compliance with existing policies HQ/1, TI/2, TI/3 and TI/8 of the SCLP 2018, the Draft policies of the Regulation 18 Local Plan and NPPF 2024 (and 2025).

5.8 Utilities

5.8.1 The Site is well served by power and utilities with an existing gas main that runs through it and has been accounted for in the masterplanning process, ensuring no encroachment of built form within the protected easement. Newlands will engage with utilities providers to identify existing available utilities and the associated capacity to accommodate the proposed development.

5.8.2 Flexibility has been built into the development to enable a connection into the Sewage network, or to provide for an on-site water treatment facility, the impact of which has been considered within the ES Scope. This serves to ensure that the development can come forward, irrespective of existing constraints that are being reported by the water/foul water providers, and thus does not in any way inhibit the potential delivery of the scheme. Planning permission exists for the Cambridge-Grafham water pipeline, which Anglian Water will deliver. A portion of this runs through the southern part of the Site and this has been accounted for in the design process, with no built form proposed anywhere within the defined easement.

6 Local Government Reorganisation

6.1 Local Development Scheme and Planning Reform

6.1.1 Local Planning Authorities are required to update their Local Development Schemes (LDS) by the end of December 2025. At the time of writing, Greater Cambridge's LDS sets out the following timescales for preparing its emerging Local Plan:

Phase of Local Plan Preparation	Timeline
Draft Plan (Reg 18)	Winter 2025/2026
Proposed Submission Local Plan Consultation (Reg 19)	Summer/Autumn 2026
Submission of draft Local Plan to Secretary of State	December 2026

6.1.2 The Planning Practice Guidance was updated on 27th November 2025 to clarify that Planning Authorities preparing Local Plans with the intention to submit the emerging Local Plan for Examination before 31st December 2026 can continue under the provisions of the National Planning Policy Framework December 2024.

6.1.3 It is noted that this position is subject to change. However, for the purpose of these representations, in the absence of information to state otherwise, it is assumed that Greater Cambridge will continue to prepare its emerging Local Plan against the requirements of the current planning system, and the 2024 NPPF, submitting the Local Plan for Examination before the end of 2026.

6.1.4 This requires the Local Plan to align and be in conformity with the 2024 NPPF. However, should the timescales slip, the Local Plan will need to align with the 2025 NPPF, which is currently out for consultation. Further, the National Decision-Making Policies (NDMP) of the 2025 NPPF would apply to future decision making, and thus it is important that the Greater Cambridge Plan aligns with these once the new NPPF is published in final form, anticipated to be in June 2026.

6.2 Local Government Reorganisation

6.2.1 It is noted that at the time of writing these representations, the Government is seeking an expression of interest from Cambridgeshire and Peterborough Authorities about the anticipated Local Government Reorganisation. There is clearly disagreement at this time between the constituent authorities about what form this should take. Huntingdonshire District Council (HDC) are proposing to continue to operate the same boundaries but include the County Council functions. Whilst Peterborough, Fenland and East Cambridgeshire would combine with the County Council functions to form a second Unitary Authority; and South Cambridgeshire and Cambridge City with County Council functions to form the third Unitary Authority as illustrated at Figure 1.

6.2.2 Peterborough City Council has opted for a variation of a three Unitary Authorities approach comprising: Greater Peterborough (Peterborough City and West Huntingdonshire), Mid Cambridgeshire (East Cambridgeshire, Fenland, and East Huntingdonshire), and Greater Cambridge (Cambridge City and South Cambridgeshire) as illustrated at Figure 2.

6.2.3 However, it is noted that not all existing authorities agree with the 3 Unitary Authority approach. South Cambridgeshire has opted for a two unitary authority approach which would see the existing Huntingdonshire area combined with Peterborough, Fenland and East Cambridge, together with County Council functions.

6.2.4 Whilst in each scenario there is consistency of Cambridge and South Cambridgeshire Councils

joining to form a single Unitary Authority, the Government may also opt to identify an alternative solution.

6.2.5 As such, there is no certainty about what the physical boundaries of the future unitary authorities will be. Any changes will inevitably have implications upon the approach to spatial considerations as part of the respective Local Plans.

6.3 Spatial Development Strategies

6.3.1 The changes to the planning practice guidance, as published on 27th November, make it clear that in the future, emerging plans need to be 'in general conformity' with the Spatial Development Strategy. It is noted that the Cambridgeshire and Peterborough Combined Authority is gearing up to submit an application to formally gain 'Established Mayoral Strategic Authority Status' and has been considering its budget to prepare a Spatial Development Strategy in 2026.

6.3.2 It is noted that a draft 'Local Growth Plan' was approved by the Combined Authority Board held on 22nd October 2025[1]. This document was launched by the Mayor of Cambridgeshire & Peterborough in December 2025. Whilst this document is not a Spatial Development Strategy, it clearly sets an ambitious growth strategy for Cambridgeshire and Peterborough, with a focus on economic growth, that is a material consideration, which the GCLP should be aligned with.

6.3.3 The Local Growth Plan is a 10 year strategic plan for the Cambridgeshire and Peterborough area that sets the economic vision, sector strengths, and priorities for collaboration with government and regional partners. Its aim is to unlock inclusive, investable, and nationally significant growth across Cambridgeshire and Peterborough.

6.3.4 The Growth Plan seeks the delivery of a wider range of jobs and skills across a broader spectrum of the economy and to broaden uses in key corridors including around Cambridge. The approach of the Draft Local Plan, to actively constrain' large scale logistics/storage and distribution, through (a) not planning for strategic scale facilities and (b) placing a restriction on the size of any B8 Storage & Distribution unit to 9,300 sq. m, is considered to be at odds with the intentions of the published Local Growth Plan. The Vision of these documents should align. Greater Cambridge's Shared Planning Service lead, Stephen Kelly has emphasised the importance of establishing a national freight hub within Greater Cambridge. Such a move would represent positive planning, consistent with Paragraph 36 of the 2024 NPPF, and align with the aspirations of the Growth Strategy, ensuring that movement of freight is given due consideration given the importance of wider economic growth in Cambridge, and the strategic importance of the A14 linking the Eastern Ports of Harwich and Felixstowe to the Midlands. However, this would require logistics buildings of a strategic scale, sufficient in size to support regional and national distribution centres. By contrast, the Regulation 18 Draft GCLP seeks to place a restriction on the size of logistics units (9,300 sq. m/100,000 sq ft).

6.3.5 The rationale for this restriction is unfounded. The Draft Local Plan seems to simply dismiss any requirement to Plan for any 'strategic scale' logistics units in the Authorities of Cambridge and South Cambridgeshire, flagging availability of land, and the impact upon such development would have upon the Life Sciences/R&D sectors. As set out in Chapter 6 of these representations, such a restriction is clearly unfounded. The A14 has been highlighted as an appropriate location for logistics in the GCLP Evidence Base (Iceni 2025), and in recent appeal decisions.

6.4 Cambridge Growth Company

6.4.1 The establishment of the 'Cambridge Growth Company' is also noted. The Government announced in October 2025, that it would hold a public consultation about the potential for this to form a Development Cooperation. In addition, evidence base documents are ongoing to inform a further plan. At this stage it is unclear how this additional plan will sit within the overarching strategic spatial planning hierarchy and to which spatial area it will relate.

[1] . Agenda for Combined Authority Board on Wednesday, 22nd October, 2025, 9.30 am

6.5 Summary

6.5.1 Given the wider planning reform, it is essential that the Greater Cambridge Shared Planning Service maintains 'effective co-operation' with all relevant stakeholders to deliver a plan fit for purpose in this changing planning and spatial context, and ensures alignment with the Decision-Making policies of the new NPPF when it is published in final form.

6.5.2 It is considered that more could be done to ensure that the Draft Greater Cambridge (Regulation 18) Plan aligns with national policy and aspirations for the Cambridge to Oxford Corridor. It should be more positively prepared, and ambitious in its approach towards employment development. At the very least planning to meet the needs in full of the industrial and logistics sector, making full provision for local need, and also making a significant contribution towards strategic need across the wider Cambridge Sub-Region, and ensuring that the development needs of all areas of this sector are met. This can be achieved through:

- Assessing the strategic need over the plan period across the wider CPCA area and apportioning this down to the individual local authority level so it's met in full in line with the approach stipulated in the PPG. This would then be additional to the local need calculated by Iceni;

- Removing the proposed cap of 9,300 sq. m on the size of industrial and logistics units; and

- The identification of additional suitably located sites for allocation.

7 Regulation 18 Local Plan Response

7.1 Introduction

7.1.1 This section assesses the draft employment policy and strategic employment objectives of the Regulation 18 Local Plan, alongside adopted and emerging national policies and guidance, and the proposed development.

7.1.2 Specifically, this section is structured to address the following key considerations for Newlands Park and the logistics sector within the draft GCLP:

- Quantum of Storage and Distribution Floorspace
- Restrictions on Unit Size
- Site Selection Approach

7.2 Quantum of Storage and Distribution Floorspace

Draft Local Plan Approach

7.2.1 Draft policy S/JH sets out the objectively assessed needs for homes and jobs in Greater Cambridge over the period 2024-2040. The policy states that the Plan will facilitate development to generate 73,300 additional jobs within the plan period, leading to the following employment land requirements:

- 302,600 sqm offices and 600,000 sqm of Research and Development (R&D) floorspace; and

- 317,000 sqm of industrial/warehousing floorspace (Use Classes B2/B8)

7.2.2 To meet the identified industrial/warehousing requirements, the draft plan proposes the following two new allocations:

- **Policy S/SHF**: Slate Hall Farm, Junction 25, A14. This draft allocation seeks to enable delivery of c.240,000 sqm of industrial/warehousing floorspace.

- **Policy S/RRA/SCS**: Land to the south of the A14 Services. This draft allocation seeks to deliver c. 90,000 sqm of industrial/warehousing floorspace.

7.2.3 Paragraph 2.72 of the draft plan states that additional new industrial/logistics floorspace will be facilitated through longer term provision at Cambourne, and through incorporating some industrial/logistics floorspace within other, unspecified mixed-use employment allocations. However, it is important to note that the existing permitted employment floorspace, pursuant to Outline Planning Permission S/2903/14/OL, comprises 6.25 Hectares, and is solely restricted to B1 (uses), which since the changes to the Use Classes Order, would equate to offices, R&D or Light Industrial uses (i.e. not B2 or B8). Further, the allocation (Draft Policy S/CBN) does not identify what uses the 24 Hectares of employment land would be allocated for. Accordingly, there is no clarity at all as to whether any B2/B8 floorspace is planned to be delivered at Cambourne. Further, it is not clear what use classes are proposed to be delivered at mixed use allocations referenced at Para 2.72. Accordingly, no commitment is made that sites at Cambourne, or any other sites referenced at Para 2.72 will deliver any of the B2/B8 need that has been identified.

7.2.4 This is a common theme throughout the Local Plan, and far greater clarity is required through the policy allocations as to the anticipated uses each employment allocation will be seeking to deliver if the approach is to be effective in ensuring the employment needs of Greater Cambridge are met.

7.2.5 The draft plan has also allocated another, smaller site to provide c.10,000 sqm of B8 floorspace at Buckingway Business Park, Swavesey (Policy S/RRA/BBP).

7.2.6 Policies S/RRA/SCS and S/RRA/BBP are both located around A14 Junction 24. They were first identified as draft allocations within the previous First Proposals iteration of the draft Local

Plan, while Policy S/SHF has been introduced as part of the current Regulation 18 draft plan to elevate the industrial/warehousing floorspace requirement, in line with the updated Iceni (March 2025) evidence base prepared to inform the Regulation 18 version of the Plan.

7.2.7 The requirement to facilitate creation of 73,300 jobs and allocate 317,000 sqm of new industrial/warehousing floorspace is derived from the following evidence base documents:

- Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU 2025);
- Greater Cambridge Employment and Housing Needs Update 2024-2045 (September 2025), prepared by Iceni; and
- Greater Cambridge Warehouse and Industrial Space Needs, prepared by Iceni (March 2025)

7.2.8 The Employment and Housing Needs Update report utilises 2011 census data to forecast that the creation of 73,248 new jobs (rounded to 73,300 in the Draft Local Plan) should be accommodated within the Plan period. This is based upon a scenario modelling approach which assumes that c. 3,500 new jobs will be created per annum. This is referred to as the 'Central' scenario. A more ambitious 'High' scenario, assuming the creation of 4,330 jobs per annum (90,900 jobs across the plan period), was also modelled by Iceni but subsequently discounted, given the 'Central' scenario's alignment with the revised Standard Method.

7.2.9 Given the Government's commitment to delivering 150,000 new homes in and around Cambridge, and the national importance of Cambridge as a net producer of jobs to a far wider area (beyond the Cambridge and South Cambridgeshire Districts), it is considered that the more ambitious 'high' scenario should have been adopted. The Standard Method is considered to be the "starting point" or the minimum target for housing delivery. Accordingly, the 'High' growth, or indeed an even higher growth scenario, would align with the scale of the Government's ambition to 2050, whereas the Draft Local Plan represents circa one third of that.

7.2.10 On behalf of MHCLG, Oxford Economics Greater Cambridge (Growth Scenarios) April 2025 assessed the growth potential of the Greater Cambridge economy. Three scenarios identify the potential for between 23,000 and 92,000 additional jobs over and above the baseline position set out the Local Plan (i.e. by Standard Method).

Newlands Response

7.2.11 NPPF Paragraph 32 states that the preparation and review of Local Plans 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.

7.2.12 This position is supported further by the PPG (031 Reference ID: 2a-031-20190722) clearly requiring that planning for logistics space is informed by:

> *"engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies".*

7.2.13 As highlighted in the accompanying evidence prepared by Stantec, the local requirement for B8 is considered to be 609,230 sq m. Draft Policy S/JH therefore plans for a shortfall of more than 270,000 sq m when assessed against Stantec's assessment, which is considered to reflect the NPPF and PPG.

7.2.14 Further, whilst Iceni reference Strategic Need within their own evidence, contrary to NPPF Para 32 and the PPG, this strategic need has not been planned for. Contrary to the requirements of the NPPF, there is no evidence of Greater Cambridge working with adjacent Authorities to deliver on the wider strategic need, and thus clearly the needs of an economic sector (logistics) whose importance is emphasised at Paragraph 86(c) of the NPPF, has not been planned for.

7.2.15 In support of this representation, a critical review of the evidence base has been undertaken within the submitted Newlands Park Cambridge Economic Needs and Benefits Statement,

prepared by Stantec. The key findings are as follows:

- Greater Cambridge has, historically, resisted provision of additional strategic distribution/warehousing floorspace through the imposition of restrictive planning policies, on the unevidenced assumption that such floorspace would stifle opportunities for high-tech businesses to flourish by absorbing large quantities of allocated employment space.

- The acceleration of the high-tech and life science sector in Greater Cambridge has led to the irreversible loss of many existing industrial/warehouse sites, while opportunities to replace and upgrade the supply are limited, leading to pent up demand.

- Iceni's approach to calculating the 317,000 sqm floorspace requirement is based upon a net absorption methodology (the total space occupied after adjusting for space vacated). An analysis of gross completions is considered to form a better indicator of actual demand, as the logistics market in Greater Cambridge experiences low vacancy levels, given the lack of supply.

7.2.16 From this analysis, the Report concludes that the 317,000 sqm floorspace figure underestimates the demand for industrial/warehousing floorspace in the region, and that additional land (comprising 609,760 sqm in total) should be allocated to ensure that the Local Plan adequately provides for such floorspace in the plan period. This will ensure that the logistics sector, which is pivotal to support Greater Cambridge's growing mid-tech, manufacturing, and life sciences sectors, can address local, regional and national demands.

7.2.17 The principal reason for this is due to the Draft GCLP seeking to place a restriction on the size of a logistics Unit. An arbitrary restriction of 9,300 sq. m/100,000 sq ft is applied.

7.2.18 As noted within the Greater Cambridge Warehouse and Industrial Space Needs report, supply and demand for storage and distribution floorspace is acute in Greater Cambridge. As of November 2024, Bidwells estimate that prospective tenants wish to occupy 13.3 million sq. ft. of floorspace in units comprising >100,000 sq.ft. in Greater Cambridge (Appendix 5). Meanwhile, the supply of such units is extremely limited, with Savills reporting as follows in January 2026:

> *2025 has seen a slowdown in take-up, but it is not for a lack of occupier appetite but rather an absence of prime new-build stock as the 'flight to quality' trend ramps up. However, with a lack of sites in prime markets, rental growth remains robust.*
>
> *Compared to a year earlier, available supply has fallen by 6%, totalling 2.05 million sq ft, with a vacancy rate of 6.42%, down from 7.03% the previous year. Based on the five-year average annual take-up, the market has about 1.01 years of supply remaining.*
>
> *Across the region, five units are available in the 100,000–200,000 sq ft range, four in the 200,000–300,000 sq ft range, one in the 300,000–400,000 sq ft range, and none over 400,000 sq ft; making larger requirements difficult to satisfy, especially in core market locations*[2]*.*

7.2.19 As detailed within the following section, the Draft GCLP, at present, fails to account for these market conditions, and thus Draft Policy S/JH significantly underestimates the quantum of B8 logistics space that should be planned for, wholly contradictory to Paragraph 32 and Paragraph 87 of the NPPF, the latter stating that planning policies and decisions should recognise and address the specific locational requirements of different sectors, making provision for storage and distribution operations at a variety of scales (our emphasis) and in suitably accessible locations.

7.3 Restrictions on Unit Size

Draft Local Plan Approach

7.3.1 Contrary to the supply and demand position set out above, part 7 of Policy J/NE (New Employment Development Proposals) states that large scale warehousing and distribution

[2] The Logistics Market in the East of England, January 2025

centres providing for national or regional needs will not be permitted in Greater Cambridge. The supporting text of this policy defines such premises as those exceeding 9,300 sqm (100,000 sq. ft.) in floor area, and states that *accommodating regional and national serving operations would add further land supply pressure in an area already facing significant land supply pressures to meet the need of specialist sectors such as the area's key life science and technology sectors, as well as increasing pressure on transport networks.*

7.3.2 This resistance to accommodating large-scale development focused on national and regional distribution is elaborated at Paragraph 3.42 of the Greater Cambridge Local Plan Topic Paper 6: Jobs (2025):

> *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.*

7.3.3 While Paragraph 3.42 acknowledges that Greater Cambridge is a desirable location for large scale logistics development, Table 0.2 of Greater Cambridge Warehouse and Industrial Space Needs report states that additional industrial/warehousing floorspace is required to serve the local Cambridge and Cambridgeshire market only, and not regional or national needs. The supporting text of Policy S/DS (Spatial Strategy) reflects this by stating that only local logistics/warehousing needs will be accommodated in the Plan:

> *To meet our immediate need for industrial floorspace and local needs for logistics floorspace (use classes B2/B8), we propose two substantial new allocations in the A14 corridor, with longer term provision at an expanded Cambourne. We also propose land at several of our mixed use allocations for general industrial space (use classes B2/B8)*

7.3.4 This approach is not advocated by Iceni within the Council's evidence base. Indeed Iceni note that units over 100,000 sq ft may come forward along the A14, and the Council's restriction is therefore a clear departure from national policy and guidance, as detailed below.

Newlands Response

7.3.5 Paragraph 8(a) of the NPPF states that the planning system must help to build a strong, responsive and competitive economy, to make sure that sufficient land is available in the right places at the right time to support growth. (our emphasis)

7.3.6 Paragraph 23 of the NPPF is clear that Local Plans should include strategic policies that provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. There is no differentiation between Local and Strategic need. Indeed Paragraph 24 of the NPPF actively looks to enforce "effective strategic planning across local planning authority boundaries" to build economic resilience, through the duty to cooperate.

7.3.7 Paragraph 26 stresses that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. This approach has simply not been adopted by Greater Cambridge in preparing the Regulation 18 Plan. The only apparent justification for not planning for anything other than local logistics/warehousing need is predicated on the '*high land take'* and undefined 'local pressures' on land supply of specialist sectors, yet the Council's own evidence base already provides allocations for R&D/Life Science Space, well beyond the need that has been assumed by Iceni.

7.3.8 Clearly, land, which is not within the Green Belt, is available, and being actively promoted by our client to deliver development that would go some way to meeting that strategic industrial /warehousing and logistics need, in a location, for which there is no demand for any other more prioritized or specialist sectors (by which we assume is referring to Life Sciences; R&D). To argue there is insufficient land to accommodate specialist sectors is wholly untrue. To the contrary, a very large amount of land has been proposed for release in other locations, closer

to central Cambridge, for example at South Trumpington, for a large quantum of R&D/Life Science floorspace, which has not been supported for release by the Authorities. Indeed, NPPG clearly acknowledges that storage and distribution uses have a set of inherent locational requirements, in that developments must be located close to a strategic road network on large sites, with sufficient access to power and labour (NPPG 031 ref: 2a-031-20190722). These characteristics clearly demonstrate that the locations typically occupied by Life Sciences and R&D uses are not suited for storage and distribution uses, so there is no competition for land between these operators.

7.3.9 Further, there is clear evidence that industrial, storage and distribution uses are essential parts of the supply chain that support those sectors that are perceived to be of higher value by Greater Cambridge. Research undertaken by Savills found that the key sectors contained in the Government's Industrial Strategy purchased £250 billion worth of inputs from the I&L sector, which is the equivalent of 22% of their overall inputs. Therefore, a failure to plan sufficiently for local and strategic industrial and logistics space will serve to undermine the wider economic ecosystem.

7.3.10 Whilst the rationale is clearly not justified, it could be understood if there was evidence of working with other Authorities to deliver on the strategic industrial and logistics need. However, there is no such evidence within either the Duty to Cooperate' Statement of Common Ground '(October 2025) or 'Duty to Cooperate' Statement of Compliance (October 2025) as to how wider economic growth, or specifically strategic industrial/warehousing need, is to be met across the wider region. It has simply been ignored, in direct conflict with Paragraph 36 of the NPPF, which requires Plans to be positively prepared. This involves, as a minimum, seeking to meet objectively assessed need, either within the Plan area, or through agreements with other authorities, so that the unmet need can be provided for in neighbouring areas. There is no such evidence, and it should be noted that none of the adjoining authorities, currently in the process of preparing their Local Plans (i.e. Huntingdonshire, Fenland and Peterborough) refer anywhere to meeting the employment needs of Cambridge and South Cambridgeshire. This is despite the Greater Cambridge Employment and Housing Evidence Update 2025 (para. 2.88) stating that 'big box' demand is met in the wider sub-region.

7.3.11 More specifically, the Housing and Economic Needs Assessment prepared to support the emerging Peterborough Local Plan states that there is significant demand for large-scale logistics development, with Paragraph 4.3 stating:

> *The market signals also indicate there is scope for new sites to be allocated because there is virtually no new supply. Take-up in the strategic warehouse market by its nature is "lumpy" so it is difficult to predict future take-up but during our workshop and consultations agents and developers indicated that there is capacity for another 4 – 5 (around 1.76 – 2.2 million sq m) Gateway Peterborough sites.*

7.3.12 Conversely, Policy LP36(b) within the draft Huntingdonshire Local Plan (Regulation 18) seeks to require large-scale logistics proposals to be supported by a proven need for additional strategic logistics and distribution, as demonstrated through the Cambridgeshire and Peterborough Combined Authority Local Growth Plan and Spatial Development Strategy.

7.3.13 The emerging GCLP's discordance with these approaches points to a failure to cooperate and align with neighbouring local authorities, which must be addressed to enable the storage and distribution sector to thrive in accordance with market conditions, and the NPPF.

7.3.14 Furthermore, current market evidence clearly demonstrates that operators require increasingly larger units. In 2024, the UK Warehousing Association (UKWA) and Savills[3] reported that warehouses are becoming larger in scale to suit occupier demands, with a dramatic increase in units comprising over 1m sq ft. In 2015, units over 1m sq ft accounted for 14m sq ft of the total stock. In the years since, this has risen by 345% to 63.5m sq ft.

7.3.15 This trend was echoed in separate, recent publications. DTRE's Big Box Logistics Report (Q3 2025)[4] reported a significant uplift in lettings comprising +300,000 sq.ft, and that just 15 new/spec units comprising between 300,000-400,000 sq.ft. were available in the UK.

[3] UKWA Report 2024: The Size and Make-Up of the UK Warehousing Sector: Savills-UKWA-Report-The-size-and-make-up-of-the-UK-warehousing-sector-2024-DIGITAL.pdf

[4] DTRE Big Box Logistics Report Q3 2025: DTRE Big Box Logistics Report - Q3 2025

Elsewhere, Savills reported a considerable acceleration in warehousing deals in the first half of 2025, noting that the average deal size increased from 236,021 sq.ft. in 2024 to 239,007 sq.ft. in 2025[5].

7.3.16 A recent report published by Knight Frank 'Future Gazing 2026'[6] highlights that whilst logistics building footprints can vary annually, they have tended average above 100,000 sq ft since 2011. This change in the market has been coming. For stock built between 2000 and 2009, units over 400,000 sq ft accounted for less than 4% of properties. However, since 2020, this size band (400,000 sq ft+) has accounted for 8% of properties.

7.3.17 The report goes on to state that, over similar time that average clear heights have increased from 10 m (32.8 ft) (for buildings built in 2020), to 11.4 m (37.4 ft) for buildings built in 2025, and that demand for larger, and taller buildings has significantly increased. Units over 400,000 sq ft that have a maximum clear height of 40 ft (12.2 m), have a vacancy rate of 6.6%. Double the rate for buildings of that size with clear heights in excess of 40 ft (3.3%).

7.3.18 Therefore the size and height of buildings is essential to ensure properties are successfully let and do not become obsolete in a short period of time. The demand for properties greater than 100,000 sq ft has increased significantly to enable racking, internal automation, and offer flexibility, to such an extent the average unit size now exceeds 100,000 sq ft. For Greater Cambridge to seek to exclude the 'average' unit size or greater, demonstrates a lack of understanding of the needs of the logistics sector, and the acute shortage of supply that exists along such an important freight/logistics corridor such as the A14.

7.3.19 Given that NPPF Paragraph 85 adds that significant weight should be placed on the need to support economic growth, taking into account both local business needs and wider opportunities for development (our emphasis), and Paragraph 86(c) adds that planning policies should facilitate development to meet the needs of a modern economy, including freight and logistics uses, the Plan as drafted is clearly unsound on three counts.

7.3.20 Firstly, it is not positively prepared. Secondly, it is not effective in the absence of any joint working on cross-boundary strategic matters; and thirdly, such an approach is not consistent with national policy (either the NPPF, or the PPG – see below) or market conditions.

7.3.21 Crucially, Paragraph 87(b) states that 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.

7.3.22 By limiting industrial/warehousing employment floorspace to address local needs only, the Draft Local Plan is in conflict with these elements of the NPPF, failing to deliver critically important infrastructure that is recognised in national policy and the Government's Industrial Strategy.

National Planning Practice Guidance

7.3.23 Guidance in the Housing and Economic Needs Assessment section of the NPPG is pertinent, as Paragraph 031 (Reference ID: 2a-031-20190722) advises plan makers on how local authorities should assess need and allocate space for logistics uses:

> *The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).*
>
> *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. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the*

[5] Savills Big Shed Briefing: Savills UK | Big Shed Briefing

[6] Knight Frank 'Future Gazing 2026': Future Gazing 2026 | Knight Frank Insights

relevant market areas. This can be informed by:

- *engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;*
- *analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;*
- *analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and*
- *engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.*

Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).

Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability

7.3.24 By only accommodating for local industrial/warehousing needs, the Draft Local Plan departs from this NPPG. Engagement with other local authorities and logistics developers/occupiers is lacking from the evidence base, while demand for large-scale logistics uses, serving regional and national operations, has not been assessed.

7.3.25 NPPG Paragraph 031 is a critical consideration for plan makers. This has been evidenced in the recent (2025) examination of the West Suffolk Local Plan. In this instance, the Regulation 19 draft of the Local Plan (2024) included a similar policy to Policy J/NE, which sought to prohibit the delivery of regional or national logistics development on the basis that such demand would be addressed at an unspecified 'sub-regional' level:

Policy SP12(l): Large scale strategic logistics proposals, typically more than 9,000 square metres floorspace per unit which are of a regional or national significance will not be permitted in the district, in order to ensure the identified needs of local businesses within the sub region can be met locally. A sub-regional approach to site identification for regionally and nationally significant logistics provision will be taken.

7.3.26 At Examination, the Inspector determined that this policy approach was unsound, citing NPPG Paragraph 031 to demonstrate that the policy was not justified, as it conflicted with the significant demand for large scale strategic logistics development in the wider sub-region, with Paragraph 250 of the Inspector's report stating:

We concluded under main issue 1 that there is significant demand for large scale strategic logistics development in the wider sub region, and an identified need for 35 hectares in West Suffolk. The restriction on such developments comprising more than 9,000 sqm is not therefore justified or consistent with national policy which recognises the critical role that such development plays in enabling an efficient, sustainable and effective supply of goods for consumers and businesses as well as contributing to local employment opportunities

7.3.27 The Inspector subsequently reworded the policy. The following wording has been taken through into the adopted Local Plan:

Policy SP22(d): Large scale strategic logistics proposals, typically more than 9,000 square metres floorspace per unit may be permitted on suitable allocations and general and rural employment policy areas provided that all relevant national (National Planning Policy Framework and Planning Practice Guidance) and local policy requirements are met and that the proposal would not prevent more localised needs being met, including for particular sectors

or existing firms that need to expand or relocate. A sub-regional approach to site identification for regionally and nationally significant logistics provision will be taken.

7.3.28 This provides unequivocal evidence that the approach taken with Policy J/NE is unsound, and will be found unsound at Examination if it is not redrafted to align with NPPG Paragraph 031 and the NPPF.

7.3.29 It is important to note that Policy SP22(d) enables large-scale logistics uses so long as it can be demonstrated that such proposals would not be detrimental to more localised needs. This element of the policy was drafted by the Inspector to account for the fact that large-scale logistics uses were not required to meet West Suffolk's evidenced employment land requirement[7]. As evidenced within this representation, the position in Greater Cambridge is different. Large-scale logistics development *is* required to meet Greater Cambridge's employment and economic development needs, so the same caveat applied at Policy SP22(d) should not carry through to Policy J/NE.

Emerging National Planning Policy Framework (2025)

7.3.30 Policy E1(1a) of the draft NPPF requires plan makers to set out a clear economic vision and strategy, having regard to the UK's Modern Industrial Strategy (November 2025), which acknowledges the vital contribution that the freight and logistics industry makes to the UK economy. This is echoed within the Government's separate Future of Freight publication (2022).

7.3.31 Policy E1(1c) also echoes Paragraph 85 of the NPPF by requiring plan makers to allocate sites to meet anticipated needs, and facilitating development to meet the needs of a modern economy, including storage and distribution operations at a variety of scales and in suitably accessible locations.

7.3.32 Policy E1(2) also notes that development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites.

7.3.33 While the emerging NPPF remains in draft form, the clear support for storage and distribution development is a clear acknowledgement of the market conditions and importance of the industrial and logistics sector to the UK economy.

7.3.34 The Draft Local Plan departs from the emerging NPPF by prescriptively limiting the scale of new storage and distribution development in Greater Cambridge, without a clear and justifiable rationale for defining the unacceptability of such development.

7.3.35 The Draft NPPF also sets out specific criteria, pursuant to Draft Policy S5, that would enable Logistics developments outside of settlements and urban areas, citing importance of proximity to the strategic transport network, and supporting logistics developments in such locations, where there is an identified need. We believe the A14 corridor, and Junction 24 is such a location which would benefit from the policies of the Draft NPPF.

7.4 Approach to Site Selection

7.4.1 We have explained above how the Draft GCLP fails to bring sufficient land forward, but the basis/justification for the site allocations selected to deliver even local Industrial and Logistics need, appear to have been determined with a heavy emphasis on accessibility by active travel.

7.4.2 First and foremost, unfettered access to the Strategic Highway Network, should be the primary determining factor when selecting sites for industrial and logistics. By their very nature these uses attract a high number of HGV movements. As emphasised within the UK Industrial Strategy, the free movement of freight and goods is of paramount importance to the strength of the UK Economy, and indeed the Local Cambridge economic ecosystem.

7.4.3 Whilst it is important to maximise the attractiveness and potential to commute to work via non-car modes and facilitate access by cycling and walking given 24 hour shift patterns associated with Industrial and Logistics uses, active travel will only be possible for a small percentage of the workforce associated with any of these sites, and thus the sustainability benefits are limited.

[7] Paragraph 81 of the West Suffolk Local Plan Inspector's Report (2025).

7.4.4 Further, given the commuting profiles are likely to be similar for any of the 4 sites, the site selection process needs to account for this, and place greater emphasis on the free movement of freight and goods, as advocated in the National Industrial Strategy. Paragraph 110 of the NPPF stresses that large scale development should be focused on locations which are or can be made sustainable, through limiting the need to travel. Minimising the distance travelled by large vehicles and HGV's on local commuter roads is key for efficient movement of logistics and the free flow of traffic.

7.4.5 The location of large scale logistics schemes adjacent to the Strategic Highway Network, and away from residential locations can help to reduce congestion and emissions, and improve air quality and public health. Pursuant to NPPF Paragraph 110, Appeal decisions, namely ref: APP/C3105/W/24/3352512 have emphasised that the operational needs of Logistics outweighs any perceived disadvantage from an accessibility perspective, consistent with the NPPF recognising and addressing the specific locational requirements of the Logistics sector.

7.4.6 In the instance of Appeal APP/C3105/W/24/3352512, the Inspector concurred that the locational requirements of storage and distribution developments will cause an inherent degree of policy conflict in relation to accessibility via active travel modes:

It is unsurprising that the siting of storage and distribution facilities causes a degree of policy conflict in so far as accessibility is concerned. The proposed facility requires to be close to the strategic road network which is, in this instance and many other such scenarios, an inherently less accessible location for many of the staff required at such premises. A balanced judgement is therefore required. Accordingly, I find that the operational need for the development to be close to the motorway… outweighs the disadvantages of the site's accessibility. (Paragraph 37 of appeal decision ref: APP/C3105/W/24/3352512).

7.4.7 This approach needs to be applied by Greater Cambridge when selecting sites. When compared to proposed site allocations S/SHF: Slate Hall Farm; S/RRA/SCS; and S/RRA/BBP, the site at Brickyard Farm clearly has the more direct access to the strategic highway network. The enclosed Note prepared by Stantec highlights that Newlands Park Cambridge can access the westbound carriageway of the A14 in under 50m and the eastbound carriageway in under 400m. This is significantly less than the draft allocated sites at Slate Hall Farm, Land to the South of A14 Services and Buckingway Business Park.

7.4.8 In particular, Site Allocation S/RRA/SCS (Land South of A14 Services), would require extensive numbers of HGV's to pass a further 750m through the Junctions to the south of the A14 that link to Boxworth Road and the entrance to the A14 Cambridge Services. The journey time for HGV's to access the westbound A14 Strategic Road Network is therefore over 4 times that of Newlands Park Cambridge, and double the time to the eastbound carriageway. The journey times for Slate Hall Farm are significantly longer still.

7.4.9 The traffic implications of this additional time/distance travelled by HGV's, upon a congested stretch of road, flagged vehemently in objections to Newlands previous proposal from Boxworth residents, does not appear to have been given due consideration, nor is it evidenced. Further, the traffic implications, particularly of HGV's arising from the development proposed pursuant to S/SHF does not appear to have been accounted for upon the already congested B1050, or A1307, which in either scenario, would require vehicles travelling at least 1km to access Junction 25, via either of these local roads.

7.4.10 Newlands instructed CBRE to undertake a labour analysis of potential employees. The work identified that there are 38,250 people within Greater Cambridge (across Cambridge City and South Cambridgeshire District) who work in the sectors of manufacturing (11,250); Transportation and Storage (4,250); wholesale retail and trade (18,000) and admin and support services (9,000). In addition, the analysis from CBRE identifies that there is the potential for between a further 2,700 and 4,800 further employees from planned housing growth in the Greater Cambridge Area. Together this represents a significant portion of the population.

7.4.11 CBRE have advised that a 25-minute commuting time is a reasonable assumption, which has been drawn from the Site. Based on the use of Bar Hill Industrial Estate as a working example, CBRE estimate that 21.1% of all employees working at the site would come from South Cambridgeshire and 11.9% from Cambridge City (a total of 33% of the workforce). They anticipate that the rest would come from:

- East Cambridgeshire (13%)
- Peterborough (11.5%)
- Huntingdonshire (10%)
- West Suffolk (8%)
- Fenland (5%)

7.4.12 Accordingly, the majority of employees travelling to the Site will travel by car, and in reality the percentage that will travel by active travel (i.e. cycling or walking) will be very limited whether that be commuting to Newlands Park; or the draft allocated sites of Slate Hall Farm; Buckingway Business Park; or Land to south of A14 services.

7.4.13 Similarly greater emphasis should be placed on the health of residents, locating Industrial and Logistics sites as close as possible to the major motorway/A road junctions, to minimize traffic and air quality impacts upon local residents, in accordance with Paragraph 110 of the NPPF. This approach is replicated up and down the country, and it is clear that Newlands' site performs best in terms of direct access onto the A14, avoiding additional traffic on local commuter roads.

7.4.14 Notwithstanding the above, the approach of selecting only 2 large sites to deliver the vast majority of Greater Cambridge's industrial and logistics space is considered to be ineffective. Through the provision of S/SHF, the Authorities assume that approximately 70% of all Industrial & Logistics need will be delivered by one land promoter, who it would appear, have no track record of delivering industrial and logistics developments. This creates risk to the deliverability of Draft Policy S/JH, whereby the vast majority of all industrial & logistics space in Greater Cambridge is controlled by one party, who can build out at whatever pace they determine.

7.4.15 Iceni's evidence, alongside the additional market research undertaken by Bidwells and Savills referenced in this section, acknowledges a shortfall of supply and that there is a clear lack of new industrial and logistics space that has been brought to market in recent years. Delivery of space in the early stages of the Plan is essential to address the backlog, and the strategy at present risks failing to create sufficient competition in the Industrial & Logistics market to deliver the required space at a pace which can keep up with market demand.

7.4.16 Similarly, the allocation of only two large industrial and logistics sites fails to capitalise upon the strategic importance, and subsequent market attractiveness, of the A14 for storage and distribution purposes. This has been addressed in detail as part of the recent (2025) allowed appeal for Newlands' proposed storage and distribution park at Thrapston, North Northamptonshire (ref: APP/M2840/W/25/3362393):

The Inquiry established that 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 202372. 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.

7.5 Summary

7.5.1 The uplift in the employment land allocated for industrial/warehousing uses in the Draft Local Plan from the previous First Proposals (2021) iteration of the Plan is supported. However, as demonstrated within this section, the quantity of industrial/warehousing floorspace allocated within the Draft Local Plan should be revisited and uplifted again, to ensure that the Plan is

sound and in accordance with national planning policy and guidance.

7.5.2 At present, the Draft Local Plan seeks to accommodate local storage and distribution needs only, while resisting the delivery of regional or national level storage and distribution uses through Policy J/NE, without evidence to support this position, irrespective of the wealth of market evidence which demonstrates acute demand for large-scale storage and distribution floorspace.

7.5.3 The assertion, within Policy J/NE and the Greater Cambridge Local Plan Topic Paper 6: Jobs, that the delivery of such floorspace would constrain the land supply of the life science and technology sectors, and intrude on the green belt, has not been evidenced.

7.5.4 Firstly, the sites promoted for storage and distribution uses as part of the emerging Local Plan, such as Newlands Park Cambridge, are strategically positioned on the A14 corridor to serve storage and distribution uses, so the delivery of this floorspace would not preclude delivery of life sciences proposed elsewhere within Greater Cambridge.

7.5.5 Secondly, Newlands Park Cambridge is not located within green belt, so it is apparent that suitable, deliverable sites for storage and distribution purposes are available within Greater Cambridge beyond the green belt.

7.5.6 Elsewhere, the evidence base appears to have discounted the consideration of additional industrial/warehousing floorspace through adopting a methodology which fails to account for the pent-up demand in Greater Cambridge, driven by historic under delivery and the loss of existing industrial/warehousing stock through recent conversions to support the high-tech and life science sectors. The emphasis on active travel within the site selection process should also be revisited, given the inherent locational requirements of storage and distribution development, while the presence of the A14 as a critical logistical route should be capitalised upon in the Local Plan, to further drive prosperity and economic growth in Greater Cambridge.

7.5.7 To ensure that the GCLP is considered sound, both the prescriptive approach within Policy JN/E, and the wider evidence base, must be revisited and revised to account for regional and national storage and distribution requirements.

8 Key Benefits of the Proposals

8.1.1 In accordance with Paragraph 11 of the NPPF, strategic policies *should, as a minimum, provide for objectively assessed needs for housing and other uses… unless:*

i. the application of policies in this Framework 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

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

8.1.2 The position established by Paragraph 11 is echoed and strengthened within the emerging draft NPPF (2025) in relation to storage and distribution proposals. Part j of Policy S5 states that major development for storage and distribution purposes outside of settlement boundaries should be supported in principle, subject to compliance with Policy E3, and demonstration that the development would address an unmet need.

8.1.3 This Section, therefore, assesses the benefits of the proposed development, to demonstrate in-principle compliance with Paragraph 11 of the current NPPF and Draft Policy S5(j) of the 2025 NPPF:

Environmental

- **Benefit 1: Landscape Enhancements.** The proposed development will deliver a genuinely landscape-led built environment, which will assimilate the development within the wider countryside, providing landscape enhancements to this non-green belt site.

- **Benefit 2: Biodiversity Net Gain**. The proposed development is targeting delivery of +25% biodiversity net gain, significantly in excess of the mandatory 10% requirement and the aspirational 20% target set out within the Council's Biodiversity SPD and the emerging Greater Cambridge Local Plan.

- **Benefit 3: High Quality Buildings**. The proposed development will be designed to achieve BREEAM Excellent as a minimum, demonstrating high energy efficiency.

- **Benefit 4: Infrastructure Enhancement**. The proposed enhancements to cycle and footpath links within Boxworth will provide a key local benefit as will enhanced public transport provision.

Economic

- **Benefit 4: Addressing Unmet Storage and Distribution Needs**. As stated at Section 6 of this representation, and within the accompanying Newlands Park Cambridge Economic Needs and Benefits Statement, prepared by Stantec, it is apparent that the evidence base prepared to support the draft Local Plan has underestimated market requirements for storage and distribution floorspace. The proposed development will provide a significant contribution towards addressing that demand on an ideally located site. Elsewhere, it has been demonstrated within this Representation that the adopted and proposed approach at Policy E/11 and emerging Policy J/NE, which seeks to prohibit delivery of regional/national scale storage and distribution facilities in Greater Cambridge, is unsound, and should be amended to enable the delivery of the key benefits associated with this development proposal.

- **Benefit 5: Increased Business Rates**. The delivery of c.160,000m2 of commercial

floorspace will deliver significant income for the Council through enhanced business rates, estimated at £5.2 million per annum.

- **Benefit 6: Supporting Cambridge's Knowledge-Economy**. The acceleration of Cambridge's knowledge-economy has resulted in the reduction of industrial employment land and buildings, replaced with research and development floorspace. Storage and distribution uses facilitate and support the knowledge economy through strengthening supply chains.

Social

- **Benefit 7: Employment Growth.** The proposed development will deliver significant local employment opportunities, estimated at 2,110 FTEs.

- **Benefit 8: Local Employment & Skills Plans**: The development will work in partnership with the Council's Economic Development team and key local partners as part of an Employment and Skills Plan, to maximise opportunities for local labour and upskilling.

- **Benefit 9: Market-Leading Facilities**: The amenity facilities 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.

8.1.4 From this, it is apparent that the proposed development will deliver sustainable development and a plethora of economic, social and environmental benefits.

8.1.5 The latest HELAA Assessment, and engagement with local stakeholders, has identified concerns regarding traffic generation, access via non-car modes, landscape impacts, archaeological constraints and potential flood risk issues in Swavesey as the key constraints to overcome. This Representation has stated how each of these elements will be addressed as part of a future planning application.

8.1.6 This, combined with the significant benefits outlined above, ensures that the proposed development comprises sustainable development which complies with Paragraph 11 of the adopted NPPF, and Policy S3 of the emerging NPPF.

9 Summary

9.1.1 This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Newlands (Cambridge) Limited (Newlands), with respect to the Greater Cambridge Regulation 18 Local Plan Consultation that is open until 30th January 2026

9.1.2 The report relates to land to the South of the A14, also referred to as 'Brickyard Farm, Boxworth Farm, Boxworth', (HELAA Reference 47353) and Newlands Park Cambridge (the Site). The Site extends to approximately 90 Hectares (Appendix 1) and has been promoted for Logistics (Use Class B8) floorspace and HGV Park (Sui Generis). The Site is under the control of Newlands as strategic land promoter (the Promoter).

9.1.3 The Site was submitted for consideration as part of the Call for Sites, initially in 2019, and most recently to the revised Call for Sites exercise in March 2025. The site has been the subject of extensive consultation with senior officers of the Greater Cambridge Shared Planning Service, with regular meetings taking place between 2022 and 2024, aimed at agreeing an appropriate form of development, setting out the demand/supply position, range of job opportunities associated with the development, and where the pool of employees is likely to be drawn from.

9.1.4 The scheme evolved to respond to comments raised by officers and has been subject to extensive public consultation with the local communities of Boxworth, Swavesey and Bar Hill. Newlands entered into a Planning Performance Agreement (PPA) with Greater Cambridge officers in September 2025, and a series of meetings and workshops have taken place through to the submission of these representations, alongside further consultation with the Parishes.

9.1.5 The result of this process has seen a further evolution to the scheme, as set out in the accompanying Opportunity Document, that has led to several key benefits. Notably:

1. Re-location of the Access away from Boxworth Road to the southern dumbbell of Junction 24 of the A14, enabling direct access for HGV's to the Strategic Road Network, and reducing the distance travelled upon local roads by more than 750m. This will reduce pressure upon areas of congestion associated with access to the A14 Services/Boxworth Road, and enable priority access for all movements to/from Boxworth Road.

2. Introduction of an HGV Parking Area, with associated amenity provision for up to 60 HGV's, reducing pressure on the heavily used HGV parking areas associated with the A14 Services. Active discussions are ongoing with the operator of the services as to the potential future management of these bays.

3. Enhanced connectivity within the site with dedicated cycle/pedestrian routes linking the amenity hub to all development platforms, introduction of E-Bikes. Also enhanced connectivity to existing off-site Cycle-routes, with seamless connection to the A14 crossing, and a provision of a dedicated cycle/footpath along Boxworth Road, that can be extended further to enable direct cycle access between Boxworth Village and the A14 crossing.

4. Introduction of an 85m 'no-build zone' set back from Boxworth Road, as part of a wider Landscape assessment that introduces strategic landscaping to the site edges and retention of hedgerows throughout the site, and minimum separation distances between buildings, informed by a series of views agreed with Greater Cambridge Landscape & Conservation officers.

5. Support for the Sustainability credentials of the scheme, which will achieve a minimum BREEAM Excellent Standard, and deliver an on-site Biodiversity Net Gain (BNG) of 25%.

9.1.6 Further consultation has been held with National Highways and Cambridgeshire County Highways, in respect of Items 1 and 3 above, which have been seen as benefits of the updated proposals. This will significantly improve the movement of freight/goods, reduce impact on the local highway, and enhance the site's accessibility via active forms of travel.

9.1.7 The site is seen as an ideal location to accommodate a significant need for B8 Logistics space in Greater Cambridge. The form of development proposed is specifically informed by specialist knowledge of the Logistics sector, the supply of units, and market demand. It will accommodate a range of unit sizes that can address historically low supply, constrained by existing policies within the adopted South Cambridgeshire Local Plan 2018.

9.1.8 The Local Plan as drafted is considered to significantly underestimate the floorspace needs of the Logistics sector. As drafted Policy S/JH plans for 317,000 sq m of B2/B8 floorspace. Evidence prepared by Stantec, and provided at Appendix 4 of this document, highlights that the need should be 609,760 sq m. The principal reasons for this, as detailed in the accompanying Stantec report, are:

- A vacancy level consistently below market equilibrium.
- Development management policies that have over the last decade prohibited the development of strategic scale regional and national distribution centres.
- Industrial and warehousing floorspace losses.
- The need to replace existing floorspace to address an increasing ageing stock and pressure from EPC ratings.

9.1.9 Notwithstanding, the Council's own evidence base is justified on a 'central' rather than a more ambitious 'higher' growth scenario, which is at odds with the Government's agenda for maximising economic growth, and the importance of growth across the Oxford-Cambridge corridor to the wider UK economy.

9.1.10 During 2025, MHCLG assessed three potential growth scenarios for job creation over and above the Standard Method, which the Council's evidence base is based upon, that could deliver as many as 92,000 jobs more than Greater Cambridge have planned for in the draft GCLP. The Government has regularly made reference to the provision of 150,000 homes in Greater Cambridge, which would be circa 300% beyond that planned for by the Regulation 18 Draft GCLP. Given the emphasis within the NPPF to positively prepare Local Plans, the level of growth planned for within the GCLP is considered to be odds with National economic objectives.

9.1.11 With this backdrop, it is apparent that to comply with paragraph 32 of the NPPF, and the PPG, and to plan for the economic needs of Greater Cambridge, a far greater quantum of Logistics space needs to be supported for Draft Policy S/JH to be considered sound.

9.1.12 The Draft GCLP also seeks to place a restriction upon the size of all Logistics units, to no greater than 100,000 sq ft (9,300 sq. m). The rationale for this appears to predicated on not planning for any 'strategic' Logistics floorspace (focusing solely on local demand), amid concerns over the land take of larger logistics units, and how this could impact the availability of land for other forms of development that are afforded higher priority.

9.1.13 This restriction is contrary to the NPPF and PPG, neither of which make any distinction between local or strategic need. Iceni's own evidence makes no basis for such a restriction. Indeed it acknowledges that larger units of greater than 100,000 sq ft may be appropriate and/or come forward along the A14 Corridor.

9.1.14 Evidence from Bidwells estimates that prospective tenants wish to occupy 13.3 million sq. ft.

of floorspace in units comprising greater than 100,000 sq.ft. in Greater Cambridge, whilst evidence from Knight Frank identifies that the average size of a Logistics unit now exceeds 100,000 sq ft, with over 8% of all units now exceeding 400,000 sq ft in size.

9.1.15 Conversely, across the region, five units are available in the 100,000–200,000 sq ft range, four in the 200,000–300,000 sq ft range, one in the 300,000–400,000 sq ft range, and none over 400,000 sq ft; making larger requirements difficult to satisfy, especially in core market locations.

9.1.16 Paragraphs 8, 26, 32 and most specifically Paragraph 86 of the NPPF advocate the planning for economic needs in full to support economic growth, taking into account both local business needs and wider opportunities for development. Many sources highlight evidence of significant demand for units over 100,000 sq ft, yet they are not being planned for. Moreover, this conflicts with national policy and guidelines, which requires authorities 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 decarbonization.

9.1.17 NPPG Paragraph 031 is a critical consideration for plan makers. This has been evidenced in the recent (2025) examination of the West Suffolk Local Plan. In this instance, the Regulation 19 draft of the Local Plan (2024) included a similar policy to Policy J/NE, which sought to prohibit the delivery of regional or national logistics development on the basis that such demand would be addressed at an unspecified 'sub-regional' level.

9.1.18 At Examination, the Inspector determined that this policy approach was unsound, citing conflict with NPPG Paragraph 031 and that the policy was not justified, as it conflicted with evidence of significant demand for large scale strategic logistics development in the wider sub-region. Paragraph 250 of the Inspector's report stated:

The restriction on such developments comprising more than 9,000 sqm is not therefore justified or consistent with national policy which recognises the critical role that such development plays in enabling an efficient, sustainable and effective supply of goods for consumers and businesses as well as contributing to local employment opportunities

9.1.19 The Inspector subsequently reworded the policy, supporting large scale strategic logistics proposals, typically more than 9,000 square metres floorspace per unit, on suitable allocations and in general and rural employment policy areas, provided that all relevant national (National Planning Policy Framework and Planning Practice Guidance) policies and objectives were adhered to.

9.1.20 The GCLP assertion that the land take of larger units would impact delivery of higher priority uses is unfounded. Evidence from Iceni highlights allocations for R&D/Life Sciences at a multiple of 1.57 identified need.

9.1.21 Further, there is no evidence within the GCLP Topic Papers Duty to Cooperate' Statement of Common Ground '(October 2025) or 'Duty to Cooperate' Statement of Compliance (October 2025) of how Greater Cambridge is working with neighbouring Authorities to deliver on wider strategic logistics needs/requirements.

9.1.22 Accordingly, the same floorspace restriction should be lifted from the GCLP. The West Suffolk Examination provides unequivocal evidence that the approach taken in Policy J/NE is unsound, and will be found unsound at Examination if it is not redrafted to align with NPPG Paragraph 031 and the NPPF.

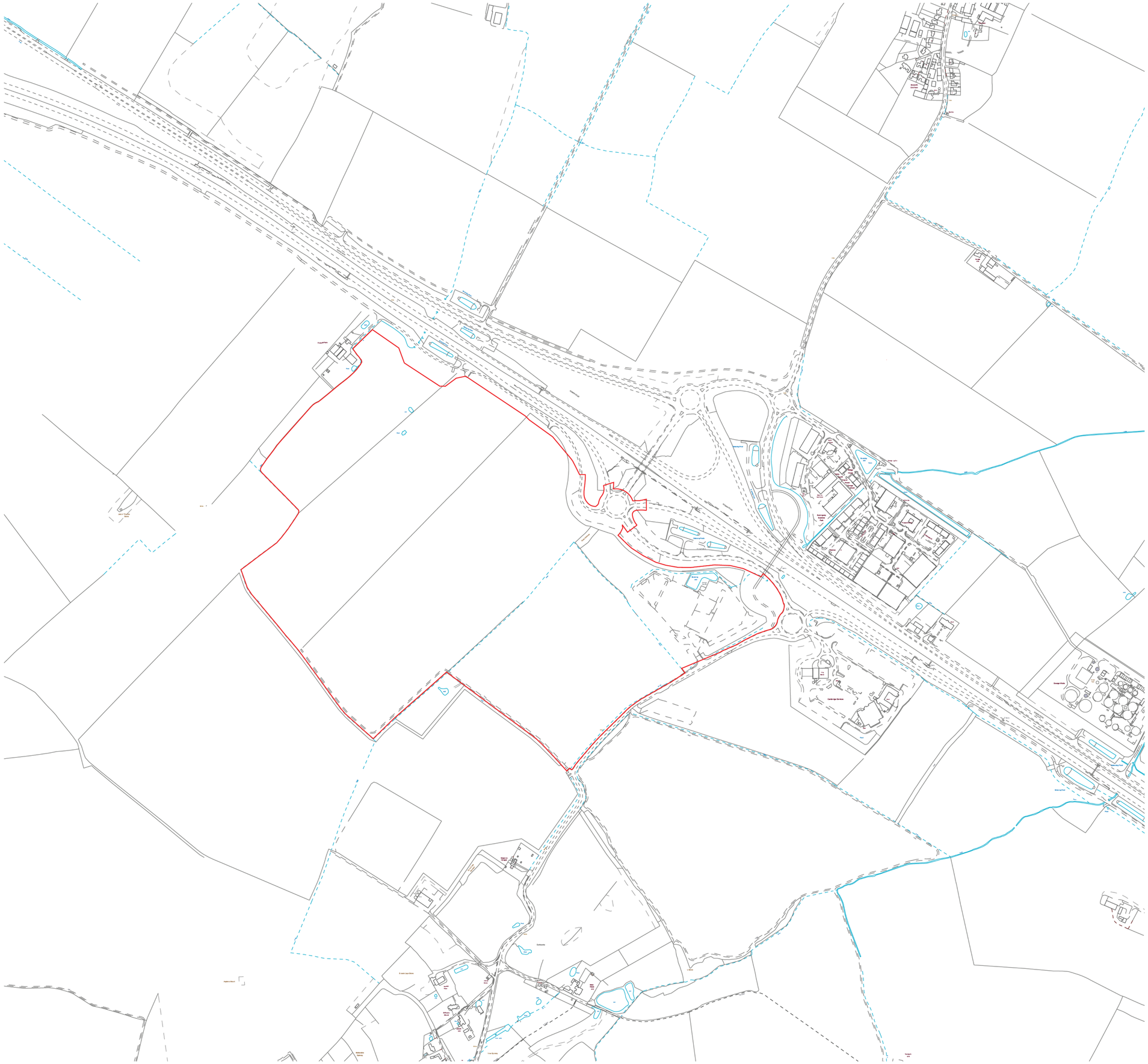
9.1.23 The shortfall in B2/B8 floorspace, should then be planned for through additional allocations, along the A14 corridor. Iceni recognise it as an appropriate location for Logistics. The Council's own evidence identifies highway capacity at Junction 24 and the importance of the A14 as a strategic logistics corridor was re-enforced in a recent (2025) allowed appeal for Newlands' proposed storage and distribution park at Thrapston, North Northamptonshire

(ref: APP/M2840/W/25/3362393). The A14 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.

9.1.24 When allocating land along this strategic corridor, emphasis should be placed upon allocating sites that can deliver the identified needs/sizes in locations that benefit from unfettered access to the Strategic Highway Network. Access to the A14 should be the primary determining factor when selecting sites for industrial and logistics consistent with NPPF Paragraph 110, and the recent appeal decision ref: APP/C3105/W/24/3352512. The operational needs of Logistics should outweigh any perceived disadvantage from an accessibility perspective.

9.1.25 Newlands Park Cambridge provides precisely for this. It would diversify the logistics offer, through the allocation of an available and deliverable site, controlled by Newlands, who have a clear track record of delivery in the Logistics Sector. The site enables a wide range of unit sizes tailored to market demand, with direct access to the A14 that is unrivalled by any site allocated to date. The Council's HELAA 2025 identifies that the scale of development proposed can be mitigated through a Planning Application, and significant progress has been made by Newlands in demonstrating this through the PPA process. Through this submission and the supporting information and it has been highlighted that there is no technical basis to not to support an allocation at Newlands Park Cambridge, enabling the delivery of over 2,110 new job opportunities to Greater Cambridge.

Appendix 1 – Site Location Plan



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North

Document Scale(s)

100m SCALE 1:5000

Key

Application Boundary 223.82 ac 90.58 ha

newlands developments

Project Name

Cambridge Gateway, Boxworth

Employer	Project Address
Newlands Developments	**Boxworth, Cambridge**

RIBA Workstage	Suitability
2 - Concept Design	**S0 - Work in Progress**

Drawn	Checked	Created	Size
LM	**MS**	**27.06.2025**	**A1**

UMC Project Reference	Scale	LOD	LO
19260	**1:5000**	**1**	**1**

Document Title

Location Plan

Document Reference

19260 - UMC - SI01 - SI - DR - A - 0079

Revision Note

Red-line amended

Issue Date	Status	Current Revision
16.10.2025	**Feasibility**	**P02**

Appendix 2 - RPS/Tetra Tech Archaeological Technical Note (January 2026)

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Our Ref: 794-PLN-HER-01684 NClet

Dear Lyndon

Newlands Park Cambridge Site: Archaeological potential

I understand that in their review of Sites submitted pursuant to the Housing & Employment Land Availability Assessment (HELAA), the local planning authority have suggested that there is "*known archaeology of significance which could not be mitigated through design or conditions (HELAA assessment score: RED)*" on the Newlands Park Cambridge Site – also known as 'Land to the south of the A14 services, Boxworth' or Brickyard Farm (HELAA Reference 47353).

The following text is set out in the HELAA with regards to archaeology on site 47353:

"*linear arrangement of landscape division and enclosure is recorded to the east of the proposal area. This is likely to date to the Middle Iron Age. There is also some evidence for Saxon activity within the area. Further information would be necessary to determine the suitability of this site for development but based on the updated HER data, the assessment has been amended to RED'.*

As you know, we have previously undertaken both a desk based assessment and a built heritage statement for the site, and have commissioned a geophysical survey of all of the surveyable areas within the site. Furthermore, we have more recently updated our previous archaeological desk-based assessment and built heritage statement, incorporating up-to-date HER data and undertaking a new site walkover and settings assessment. Having undertaken this work, we are well placed to judge both the archaeological potential of the site and potential impacts on nearby built heritage assets of the proposed Logistics scheme that is promoted for development on HELAA Site 47353 through the Regulation 18 Greater Cambridge Local Plan process. This letter is provided to append to Regulation 18 Representations.

Archaeological remains

There are no designated archaeological assets either within the site, or sufficiently close to be impacted by the scheme. Consequently the main impact on archaeological remains will be physical impacts on any archaeological remains within the footprint on the site itself. The site and its surrounds have been subject to extensive archaeological investigation in the last few years, which affords us a degree of confidence in the accuracy of our assessment.

In 2004, in advance of the construction of a proposed windfarm, a programme of archaeological trial trenching was undertaken partially within the site, and partially to the south and west of the study site. Two trenches were excavated within the southern part of the site. Eight worked flints dating from the Bronze Age were recovered from one of these trenches. Trenches outside the site also identified two ditches also containing Bronze Age pottery.

As part of the A14 improvement scheme, an extensive programme of trial trenching was undertaken along the line of the proposed road improvements in 2014. Within the immediate vicinity of the site, 68 trenches were excavated immediately to the north of the study site. The only remains identified from this trenching were a number of natural tree-throws and a modern ditch.

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A second phase of evaluation associated with the A14 improvement programme was undertaken in 2016. This took the form of a geophysical survey followed by trial trenching. As part of this work 12 trial trenches were excavated in the northeast corner of the study site. The only archaeological features encountered in this area were a few Post-Medieval or Modern ditches.

Further extensive trial trenching was undertaken approximately 200m to the south of the study site in Autumn/Winter 2016. Several shallow gullies were encountered within these trial trenches, two of which contained material attributed to the Roman period.

Finally, we commissioned an extensive geophysical survey of the proposed development site in August 2022. The survey detected anomalies of a probable archaeological origin in the form of a linear sequence of enclosures crossing the site on a northwest-southeast alignment. The form of these features suggests that they are likely to be Iron Age or Romano-British in date. Other possible linear archaeological anomalies recorded may represent individual ditches. Agricultural anomalies have been detected in the form of known field boundaries, drainage systems, and ploughing trends most likely of Medieval or Post-Medieval date.

Existing national policy guidance for archaeology enshrines the concept of the 'significance' of heritage assets. Significance as defined in the NPPF centres on the value of an archaeological or historic asset for its 'heritage interest' to this or future generations.

As part of our work on the site we have assessed the archaeological potential of the site by period and the likely significance of any archaeological remains encountered:

Period	Identified archaeological potential	Identified archaeological significance
Palaeolithic to Bronze Age	Moderate to High – Bronze Age peripheral occupation activity	Low (Local)
Iron Age & Roman	High – Ladder settlement	Medium (Regional)
Anglo-Saxon & Medieval	Low	Low (Local)
Post medieval & Modern	Moderate (agricultural)	Low (Local)

As you can see, we consider that the highest potential for archaeological remains is within the Iron Age and Roman period , and that the likely archaeological significance of these remains is no more than regional. Linear settlement and agricultural enclosure complexes, as identified by the geophysical survey, are common features of the local Iron Age and Roman landscape, and of regional rather than national importance.

Low level Bronze Age and Medieval/Post-Medieval remains are also anticipated, the former likely representing small scale settlement or agriculture of local significance, whilst surviving agricultural earthworks within the study site dating to the Medieval or Post-Medieval periods of limited quality can be considered of local significance, at best.

This theoretical archaeological potential will be confirmed through a programme of trial trenching, which has already been agreed with the archaeological advisors at CHET, and the results will be available in time to inform the decision making of any future application which may be submitted. However, none of the archaeological potential identified to date is considered sufficiently significant to be a constraint to development, and it is anticipated that the archaeological potential of any archaeological remains within the site which are threatened by the development can be realised through a programme of archaeological excavation, recording, and dissemination, which could be achieved by an appropriately worded planning condition.

Built Heritage

In addition, we have undertaken an assessment of the potential impacts of developing the site on nearby built heritage assets, both designated and undesignated. This has involved a detailed setting assessment, walkover survey, visits to assets to determine intervisibility and assess settings, combined with the use of a Zone of Theoretical Visibility (ZTV) to determine potential intervisibility and inform decision making. As a result

of this work, we have identified a small number of built heritage assets which could potentially have their settings altered as a result of the proposed development, but it is considered that these alterations are so slight, that there will be no change to the significance of any of the buildings.

Consequently we do not believe that there will be any potential impacts on built heritage assets should the scheme proceed.

Conclusion

Having undertaken significant research into the site, its archaeological potential and the designated and undesignated built heritage assets in the surrounding area, we do not believe that the HELAA assessment score of RED recorded by the Local Planning Authority is justified. The site and its environs have seen much archaeological investigation and we are confident in our assessment of the archaeological potential of the site. Our work has identified no archaeological potential significant enough that it could not be realised through a programme of archaeological fieldwork, recording and dissemination which could be achieved through a condition on any planning permission, nor have we identified any potential impacts on built heritage assets which might arise should the scheme as proposed be constructed

I trust that is of assistance

Best regards



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Appendix 3 - Stantec Assessment of Economic Need (January 2026)

Newlands Park Cambridge Economic Need and Benefits Statement

Addressing Greater Cambridge Industrial and Warehousing Planning Policy Development Land Needs Assessment and the Economic Benefits of the Proposed Development

Stantec

Prepared for:
Newlands Developments

Prepared by:
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Date:
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Project/File:
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Stantec UK Limited

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Executive Summary

i This report has been prepared for Newlands (Cambridge) Limited ('Newlands') by Stantec Development Economics and makes the economic case for the development of a logistics park knows as Newlands Park Cambridge on Land at A14 Junction 24, Boxworth.

ii Newlands Park Cambridge's location, scale, and connectivity make it well placed to deliver a high-quality logistics park that will strengthen Greater Cambridge's economic resilience and supply chain efficiency. A total of 2,110 jobs will be created on site, directly providing employment for 590 Greater Cambridge residents and indirectly providing employment for a further 770.

iii The received wisdom in Greater Cambridge, adhered to for the last 20 years, is that any large scale regional and national distribution would crowd out, displace or otherwise jeopardise the supply of land for Greater Cambridgeshire' specialist and target sectors. There is no evidence to support such a proposition.

iv The outright rejection of large-scale logistics in past, current and proposed planning policy is irrational and unsound. Newlands Park Cambridge would not - does not - displace Greater Cambridge specialist sectors, quite the opposite. Newlands Park Cambridge is in the right location to serve the needs of specialist sectors, supporting their growth, their supply chains, the needs of their workforce.

v Analysis of the Council's assessment and the industrial and warehousing property market indicators presented in their evidence base (inventory, vacancy, absorption and completions) provides a basis for developing an alternative assessment that addresses the following key factors:

- A vacancy level consistently below market equilibrium.
- Development management policies that have over the last decade prohibited the development of strategic scale regional and national distribution centres along a section of a nationally significant freight corridor (i.e. the A14).
- Industrial and warehousing floorspace losses.
- The need to replace existing floorspace to address an increasing ageing stock and pressure from EPC ratings.

vi Using the Council's gross completions estimate, applying adjustment for current and future vacancy (to 7.5%), and a margin of 30% returns **a plan period requirement for 507,260 sqm industrial and warehousing floorspace**.

vii In addition, to address industrial and warehousing stock replacement, **a further 102,500 sqm should be added to the requirement.** This falls midway between the B2/B8 stock replacement range arrived at in the Council's evidence base.

viii Although the draft Local Plan allocates around 300,000 sqm of logistics floorspace, this is clearly insufficient to satisfy objectively assessed need. To address the significant shortfall and sustain economic growth, further allocations should be made to ensure Greater Cambridge has the capacity to accommodate local, regional and national distribution and warehousing needs.

ix There is an urgent need for further industrial and warehousing allocations.

1 Introduction

1.0.1 This report has been prepared for Newlands (Cambridge) Limited ('Newlands') by Stantec Development Economics. Newlands proposes the development of a logistics park at Land at A14 Junction 24, provisionally known as Newlands Park Cambridge, the economic case for which is established by this report.

1.1 About the development

1.1.1 Newlands Park Cambridge will deliver about 1,721,500 sqft (159,931 sqm) GIA of logistics floorspace on the A14 (see Figure 1-1). The A14 is a key east–west trunk route linking the Midlands to the East Coast ports and forming part of the Trans-European Network.

1.1.2 The A14 provides direct, high-quality dual carriageway access to the A1(M) to the west and the Port of Felixstowe to the east, making it one of the UK's principal freight corridors. This connectivity enables efficient national and international distribution, significantly reducing travel times and logistics costs for occupiers.

1.1.3 Proximity to Cambridge Services further enhances operational convenience, offering 24-hour amenities for HGV drivers and staff. Overall, the site's location adjacent to the A14 positions it exceptionally well for regional, national, and port-related logistics operations, providing strong commercial appeal to occupiers seeking rapid access to major road networks and supply chain routes.

Figure 1-1 Newlands Park Cambridge Illustrative Masterplan



Source: Newlands

1.2 Headline Economic Benefits

1.2.1 In the absence of known occupiers and staffing numbers, our estimate of the number of jobs that will be accommodated at Newlands Park Cambridge is informed by the Homes and Communities Agency (HCA) Employment Density Guide (2015) ("Density Guide").

1.2.2 The Density Guide proposes three employment densities (sqm floorspace per full time employee) for logistics (B8 storage and distribution) operations, that are applied to the development's GEA (c167,500 sqm), as follows:

- 95 sqm for national distribution centres
- 77 sqm GEA for regional distribution centres
- 70 sqm for final mile distribution centres

1.2.3 For the purposes of this analysis, we have applied each of the three employment densities listed above to one third of the proposed floor area, which returns **a total of 2,110 jobs on site**.

1.2.4 Based on employee locational analysis by CBRE, and taking account of deadweight and displacement, we estimate that **590 of these jobs could be taken by residents of Greater Cambridge**. Multiplier effects (jobs in the local supply chain and wage induced) could increase this number to **1,360 residents employed directly and indirectly, once Newlands Park Cambridge is fully operational.**

1.3 Report Contents

1.3.1 The remainder of this report is structured as follows:

1.3.2 Section 2 examines Greater Cambridge Planning Policy and plan making pertinent to distribution and warehousing, highlighting past, current and proposed planning policy that prohibits the allocation of land for distribution and warehousing development in Greater Cambridge.

1.3.3 Section 3 reviews the industrial and warehousing floorspace assessment that informs the draft Local Plan and develops an alternative, preferred assessment that addresses the atypical and constrained market context.

1.3.4 Section 4 addresses the supply of industrial and warehousing sites in Greater Cambridge.

1.3.5 Section 5 discusses the significance of the A14 and unmet regional and national requirements.

1.3.6 Section 6 presents conclusions and key findings.

2 Greater Cambridge Planning Policy and Plan Making

2.0.1 Cambridge City Council and South Cambridgeshire District Council have a history of joint working for plan making, evident in their previous plans[1], and the preparation and content of their current plans, both of which were adopted during Autumn 2018.

2.0.2 Winter 2025 marks more than 7 years since the current Local Plans for Cambridge and South Cambridgeshire were adopted. Preparation of a new Local Plan, for the combined area of Cambridge and South Cambridgeshire, described as "Greater Cambridge" commenced in 2020.

2.0.3 Preparation has reached publication of the Greater Cambridge Draft Local Plan (Regulation 18) for public consultation, commencing December 2025.

2.0.4 This section reviews and comments on past, current and proposed planning policy that directly impact upon the allocation of land for distribution and warehousing development in Greater Cambridge.

2.0.5 The key takeaway is that the allocation of land for regional and national distribution and warehousing development has been effectively prohibited for the last 20 years, meaning that the development of such premises has been barred.

2.0.6 In turn, the latest assessments of need for employment land that have informed preparation of the Greater Cambridge Plan exclude land for regional and national distribution uses.

2.1 Current Local Plan Policy

2.1.1 The Cambridge Local Plan was adopted 18th October 2018 and the South Cambridgeshire Local Plan adopted 27th September 2018, having been submitted for examination in 2014.

2.1.2 Both plans were informed by a shared employment land evidence base, prepared between 2008 and 2013. This evidence base pointed to an increase in land required for office and R&D development, set against net losses of industrial and warehousing land.[2]

2.1.3 A forecast loss of industrial and warehousing land in South Cambridgeshire is unsurprising. Restrictive policy had been in place for many years (since at least 2007) at the time South Cambridgeshire's Local Plan was being prepared. These policies, and the extent to which they would be continued, is addressed in South Cambridgeshire's Employment Topic Paper (2014):

[1] Adopted 2006 and 2007 respectively, following a review period that commenced in the early 2000s.
[2] Topic Paper – Employment Cambridge City Council and South Cambridgeshire District Council, March 2014.

> *Following consideration of options through the Issues and Options process, the Councils have responded by removing* ***restrictions on the occupancy of new employment buildings that were included in previous plans*** *…*
>
> ***The only element to be retained is a restriction on large scale warehousing and distribution centres****.*[3]

2.1.4 The restrictive policies in 'previous plans' quoted above is a reference to South Cambridgeshire's Development Control Policy ET/1, published in the Development Plan Document (DPD) adopted July 2007:

> 1. *Employment development, including change of use, will only be permitted if it is demonstrated that it falls into one or more of the following:*
> *…*
> d. *Other* ***small-scale industries, in use classes B1 (c), B2, and B8 (up to 1,850 m2)****, which contribute to a greater range of local employment opportunities, particularly if it takes advantage of the development of locally-based skills or expertise (****large scale expansion of such firms will not be permitted****). (****1,850m2 refers to the maximum size of occupation of any one user on a site****.)*[4]

2.1.5 Supporting text to the 2007 DPD reinforces the point:

> ***Large-scale manufacturing, distribution and warehousing, and office firms that could equally well locate in other areas of the county, will not be permitted.*** *This approach is necessary to manage the intensive development pressure in and around Cambridge. Given the need to protect the environment, employment land in the district is a scarce resource. The policy also supports the further development of the clusters of high technology, research and development.*[5]

2.1.6 The decision to continue restrictive policy towards distribution and warehousing development proposals gave rise to empathic Policy E/11 in South Cambridgeshire Local Plan, as follows:

> ***Policy E/11: Large Scale Warehousing and Distribution Centres***
>
> ***Large scale warehousing and distribution centres will not be permitted in the district[6].***

2.1.7 The supporting text to this prohibitive policy notes that 'a large land area' is required for such uses, and claims that, as a result, this type of development could harm the economy:

> *This element of the 'Selective Management of Employment' policies for the Cambridge area warrants retention.* ***These uses require a large land area*** *but generate relatively low numbers of jobs.* ***They could quickly reduce the available land supply, and increase pressure on transport networks, which could harm the continued prosperity of the high technology clusters****. Whilst proposals for warehousing supporting other employment uses or meeting local*

[3] Ibid, page 10, paragraph 1.41 and 1.42
[4] Development Control Policies DPD, July 2007, page 42, Policy ET/1 paragraph 1d and footnote 4.
[5] Development Control Policies DPD, July 2007, page 43, paragraph 5.3
[6] South Cambridgeshire Local Plan, Page 184, foot of page, after paragraph 8.50

> *needs will be supported subject to other policy requirements, large scale proposals serving a wider regional or national function will not be supported.*[7]

2.1.8 The same claim is repeated in the Policy Review of the Adopted Local Plans for Greater Cambridge, published in June 2023, in the context of attempting to reconcile Policy E/11 with the National Planning Policy (NPPF) published in 2021:

> *The NPPF says that planning policies should recognise and address the specific locational requirements of different sectors, including for storage and distribution operations at a variety of scales and in suitably accessible locations (paragraph 83).* ***Policy E/11 restricts large scale warehousing and distribution****, but* ***specifically because of the importance of other high-tech sectors within Greater Cambridge****, and the need for careful management and protection of* ***employment land****. Therefore, local justification is provided.*[8]

2.1.9 The Policy Review concluded that E/11 was consistent with national policy, signalling that it would be retained within the emerging Greater Cambridge Local Plan and discussed below.

2.2 Preparation of the Greater Cambridge Local Plan

2.2.1 Preparation of the new plan followed a Call for Sites in 2019 and commenced with the Issues and Options consultation in 2020, a process known as 'First Conversations'. Preferred Options were published as 'First Proposals' towards the end of 2021.

2.2.1 First Proposals

2.2.1.1 Under proposed policy J/NE: New employment development proposals, First Proposals confirmed that restrictive /prohibitive development policy E/11 would be retained:

> ***Large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge.***[9]

2.2.1.2 First Proposals does not suggest that there will be no demand for such premises, rather, it rules them out on the grounds that such developments take up too much land:

> *A need for additional space for warehousing and distribution (Use Class B8) was identified in the Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) and potential sites are proposed to be allocated (see the Strategy section of this consultation). However,* ***whilst we need to meet the needs for local distribution, as a central location the area may be desirable to national distributors. Given the very high land take of this type of use, the local pressures on land supply for a range of uses, and the Green Belt location, it is proposed***

[7] Page 184/5, paragraph 8.51
[8] Policy Review of the Adopted Local Plans for Greater Cambridge, Cambridge City Council and South Cambridgeshire District Council, June 2023, Page 127 / 128.
[9] First Proposals, page 228, under the heading 'proposed policy direction'.

> ***that the plan continues to not support large scale regional and national distribution proposals.***[10]

2.2.1.3 Consequently, First Proposals includes the following allocations intended, alongside manufacturing uses, to accommodate warehousing and distribution uses that serve Greater Cambridge markets only

- 18.2 ha for B2 or B8 (sub regional needs, i.e., Greater Cambridge) on Land to the south of the A14, j24 Services[11], and,
- 2.1 ha, for B2 and B8 (small to medium sized premises) on Land at Buckingway Business Park, Swavesey, also at A14 j24.[12]

2.2.1.4 The supporting text to Policy J/NE and quoted above acknowledges that there is a need for additional B8 land (i.e., additional to the proposed allocations).

2.2.1.5 The quantity of additional land is not reported, or assessed in the evidence base, however the implication is that the requirement would be substantial, commensurate with 'a very high land take'.

2.2.1.6 The reason for not quantifying a need or requirement for regional and national distribution land, is that there is no intention to accommodate it in Greater Cambridge. It is ruled out on the assumption that it would be harmful to do so.

2.2.1.7 The assumption appears to be that large scale regional and national distribution would crowd out, displace or otherwise jeopardise other economic uses that have been afforded greater priority.

2.2.2 Development Strategy Update

2.2.2.1 First Proposals was followed in January 2023 by the Development Strategy Update (reporting Preferred Options), which concluded that the First Proposals development strategy remained valid and would:

> *… inform the identification of any additional sites that may be necessary to meet, or go towards meeting, the 2022 housing and employment targets.* ***As such we would expect to reach a view on the sites included in the First Proposals as a first step****.*[13]

2.2.2.2 The Strategy Topic Paper that accompanied the Development Strategy Update observed that 'there is some uncertainty' as to whether the current land supply and First Proposals allocations would be sufficient to meet industrial and warehousing needs.[14]

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[10] First Proposals, Page 230, final paragraph.
[11] First Proposals (2021), page 128 / 129, S/RRA/SAS.
[12] First Proposals (2021), page 130, S/RRA/BBP.
[13] Development Strategy Update (January 2023), page 17/18, paragraph 5.5.
[14] Strategy Topic Paper (January 2023), page 25, paragraph 2.37.

2.2.2.3 Land supply uncertainty was created by updated employment land needs evidence, published in December 2022[15]. This reported a need for 200,000 sqm industrial warehouse needs[16], compared to the previous assessment of about 80,000 sqm[17], that underpinned the First Proposals' move to allocate 'Land to the south of the A14' and the smaller 'Land at Buckingway Business Park'.

2.2.2.4 Whilst assessed need increased significantly, it continued to be solely for sub-regional distribution and warehousing, derived as it is, from a past trend that has no trace of large scale regional and national distribution and warehousing development within it.

2.2.2.5 Neither the Development Strategy Paper, the Topic Paper, nor the update needs evidence signalled a move away from an embargo on the development of large-scale distribution premises in Greater Cambridge.

2.2.3 Draft Greater Cambridge Local Plan 2024 to 2045

2.2.3.1 The draft Local Plan for Consultation (Regulation 18) was published in October 2025 for scrutiny by Councillors. On 25th November 2025, Cabinet agreed the Draft Local Plan.[18]

2.2.3.2 In the introductory section to the draft Local Plan, the spatial portrait describes the area's economy as follows, noting that sub-regional economic growth has driven an increasing requirement for logistics uses:

> *Greater Cambridge is home to an internationally significant and well-established network of employment clusters, particularly in life sciences, information technology and advanced manufacturing, supported by two major universities. These knowledge intensive clusters play a pivotal role in sustaining Greater Cambridge's economic momentum and comprise some of the fastest-growing industry sectors in the UK. They have seen remarkable growth, with employment increasing by 3.0% between 2018 and 2024, more than double the 1.3% growth rate for these sectors seen across Great Britain. In the 2025 Global Innovation Index, Cambridge was ranked the second most intense innovation cluster globally.*
>
> *While these sectors are among the most prominent, the local economy is also diverse. The contribution of Greater Cambridge's education, retail, health, tourism, transport and agriculture sectors is crucial, providing a variety of employment opportunities and supporting the economic, social and environmental well-being of the area and its residents.* ***The growth in employment, productivity and local start-ups of the area has created a rising demand for new employment floorspace, supporting***

[15] Greater Cambridge Employment and Housing Evidence Update: Employment Land, Economic Development and Relationship with Housing (December 2022, revised January 2023)

[16] Strategy Topic Paper (January 2023), page 17 and 18, paragraph 2.10 which states that for industrial and warehouse needs the labour demand scenarios report a circa 40-60,000 sqm floorspace requirement. It is considered appropriate to factor in some replacement of losses in the future to reduce market pressure. Between 25% and 50% of past losses are recommended for replacement, after considering market signals, which results in a preferred need of around 200,000 sqm.

[17] Greater Cambridge Employment Land and Economic Needs Study (November 2020), page 126, Table 41.

[18] Subject to proposed modifications that do not directly impact upon the issues discussed in this report.

> ***infrastructure, a skilled and diverse workforce and a growing need for logistics and associated transport networks.***[19]

2.2.3.3 The Draft Local Plan's Development Strategy introduces a vision for Greater Cambridge. In summary, it is a vision to cut environmental impact while driving innovation and inclusive growth. Seven strategic priorities flow from this vision, including 'Jobs', which encapsulates the Draft Local Plan's economic goals:

> *Encourage a flourishing, dynamic and mixed economy in Greater Cambridge which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation.*[20]

Policy S/JH: New jobs and homes

2.2.3.4 Policy S/JH articulates the areas objectively assessed needs for homes, jobs and employment land over the plan period. The number of additional jobs is set at 73,300, and the following employment land needs identified:

- 302,600 sqm offices and 600,000 sqm of Research and Development (R&D) space
- 317,000 sqm of industrial and warehousing (use classes B2/B8) space.

2.2.3.5 The source of the jobs and employment land needs figures is Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU 2025). The industrial and warehousing figure is greater than assessed in December 2022, 317,000 sqm versus 200,000 sqm, an increase of 117,000 sqm or 37%.

2.2.3.6 This increase arises for two reasons. First, a central forecast for strong employment growth, that may be exceeded if short term growth trends persist, the response to which has been greater emphasis on market signals, specifically, past completions as the basis for assessing B2/B8 needs[21].

2.2.3.7 The distribution and warehousing component of the 317,000 sqm is, in common with previous assessments, solely the need for sub-regional distribution and warehousing, and based on a past trend that has no trace of large scale regional and national distribution and warehousing development within it.

Policy S/DS: Development strategy

2.2.3.8 Policy S/DS establishes where the development needs identified in S/JH should be provided. To address industrial and warehousing (B2/B8) needs, two new allocations are proposed (providing about 330,000 sqm in total), Slate Hall Farm and Land to the South of the A14 Services.

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[19] dGCLP (November 2025), Section 1 About the Plan, page 33, paragraph 1.7.
[20] dGCLP (November 2025), Section 2 Development Strategy, page 47, paragraph 2.4, final bullet.
[21] The assessment is examined in section 4 of this report.

2.2.3.9 Land South of A14 Services was identified in the First Proposals, in 2021. Slate Hall Farm is introduced for the first time in the Draft Local Plan. Taken together, these allocations address the EHEU 2025 assessment of need for 317,000 sqm of B2 and B8 floorspace:

> ***Slate Hall Farm, Junction 25, A14*** *– a new allocation for masterplanned employment-led development that responds sensitively to the local landscape and secures access to new green infrastructure for future workers and the local community: including* ***approximately 240,000m2 employment floorspace*** *for industrial and warehousing uses, with a mix of small-medium units to support the growth of a wide range of different businesses.*
>
> ***Land to the south of the A14 Services*** *– a new allocation for* ***approximately 90,000m2 employment floorspace*** *for industrial, warehousing and lorry parking to support the future space needs of Greater Cambridge's businesses and deliver a range of new employment opportunities.*[22]

S/DS supporting text: spatial strategy

2.2.3.10 The Draft Local Plan's employment strategy, as it relates to Policy S/DS is outlined in supporting text, confirming that assessed logistics floorspace requirements and corresponding allocations address local need, thereby excluding regional and national operations:

> *The Greater Cambridge economy is nationally and internationally important. The area is home to two Universities and one of the most significant clusters in Europe of high-tech industries, research and development and life sciences. It also has a range of other industries operating successfully in the area. After identifying overall needs we explored in greater depth the needs of sectors to help us understand how the plan can best support in terms of land supply but also the location and types of space that are needed.*
>
> *Our economic strategy responds to the specific locational and space-type needs of different sectors, comprising several mixed use sites that include both homes and employment space, the expansion or redevelopment of existing employment sites, and major new industrial and distribution sites. There are also several new small and medium employment allocations identified within urban and rural areas:*
>
> *…*
>
> - ***To meet our*** *immediate need for industrial floorspace and* ***local needs for logistics floorspace*** *(use classes B2/B8), we propose two substantial new allocations in the A14 corridor, with longer term provision at an expanded Cambourne. We also propose land at several of our mixed use allocations for general industrial space (use classes B2/B8).*[23]

[22] dGCLP (November 2025), Section 2 Development Strategy, page 58, 2e i and ii.
[23] dGCLP (November 2025), Section 2 Development Strategy, page 71 /72, paragraph 2.72 and third bullet point.

Policy J/NE: New employment and development proposals

2.2.3.11 Section 8 of the Draft Local Plan. 'Jobs', sets out policies which will guide employment development proposals. The are 11 such policies, the first and most relevant of which is Policy J/NE, a policy that 'guides where proposals for employment development in urban areas, villages and in the countryside are acceptable'.[24]

2.2.3.12 Part 7 of J/NE is pertinent and reads as follows:

> ***Large scale warehousing and distribution centres***
>
> *7. Large scale warehousing and distribution centres providing for national or regional needs **will not be permitted** in Greater Cambridge.*[25]

2.2.3.13 The supporting text provides the following clarification:

> *Significant additional space for industrial and distribution space has been allocated in the Strategy section of this document responding to identified needs. Proposals for warehouse and distribution centres meeting local needs within or beyond these sites may be supported subject to other policy requirements. However, **proposals for large scale warehousing or distribution centres, which for the purposes of this policy we define as those premises generally exceeding 9,300 square metres (100,000 square feet) and which serve a wider regional or national function, will not be supported.** [26]*
>
> ***Accommodating regional and national serving operations would add further land supply pressure in an area already facing significant land supply pressures** to meet the need of specialist sectors such as the area's key life science and technology sectors, as well as increasing pressure on transport networks.*

2.2.3.14 The assumption appears to be that *any* large scale regional and national distribution would crowd out, displace or otherwise jeopardise other economic uses that have been afforded greater priority. There is no evidence to support such a proposition.

2.2.3.15 The notion that the supply of land for specialist sectors is especially constrained does not stand up to scrutiny, noting that a significant increase in the need for industrial and small-scale distribution and warehousing floorspace has been accommodated, through the allocation of land for 240,000 sqm floorspace on the A14.

2.2.3.16 In that context, the outright rejection of large-scale logistics is irrational, when further opportunities to allocate land on the A14, in addition to the proposed allocations, have been identified.

2.2.3.17 These A14 opportunities would not displace Greater Cambridge specialist sectors, quite the opposite. They are in the right location to serve the needs of and so support the

[24] dGCLP (November 2025), Section 8, Jobs, page 560.
[25] dGCLP (November 2025), Section 8, Jobs, page 562
[26] dGCLP (November 2025), Section 8, Jobs, page 563

growth of the specialist sectors, for example, their supply chains and the needs of their workforce. In the context of Greater Cambridge's supply of land for specialist sectors (936,144 sqm R&D) significantly in excess (x1.56) of identified needs (600,000 sqm).[27]

2.3 Reconciling the Draft Local Plan's approach to distribution and warehousing with National Planning Policy Framework and Planning Practice Guidance

2.3.1 The extent to which the Draft Local Plan's approach to distribution and warehousing is consistent with the National Planning Policy Framework, December 2024 (NPPF) and accompanying Planning Practice Guidance (PPG) is considered below.

2.3.2 Section 2 'achieving sustainable development', of the NPPF states that the economic objective of the planning system is:

> *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.*[28]

2.3.3 Section 3 'Plan-making', states that plans should provide a framework for addressing economic priorities[29]. To that end, strategic priorities should make sufficient provision for employment development[30] and:

> *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.*[31]

2.3.4 This economic role of the planning system is expanded upon in Section 6 of NPPF, '*Building a strong, competitive economy*' which states that:

> *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.*[32]

2.3.5 In that context, planning policies should:

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[27] Greater Cambridge Employment and Housing Needs Update 2024-2045, Final Report – September 2025. Published as part of draft Local Plan (Regulation 18) for consultation December 2025 – January 2026. Page 62, Table 5.7 and paragraph 5.44, and page 64, paragraph 6.1 f) and g).
[28] National Planning Policy Framework, December 2024, paragraph 8, part a
[29] National Planning Policy Framework, December 2024, paragraph 15
[30] National Planning Policy Framework, December 2024, paragraph 20, part a
[31] National Planning Policy Framework, December 2024, paragraph 32
[32] National Planning Policy Framework, December 2024, paragraph 85

> *pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.*[33]
>
> *be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.*[34]

2.3.6 And such planning policies should 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.*[35]

2.3.7 The Draft Local Plan assumes that large scale regional and national distribution would crowd out, displace or otherwise jeopardise other economic uses that have been afforded greater priority. The NPPF's economic objectives do not support this subjective approach, rather, they point directly to the need to plan for logistics operations at all scales.

2.3.8 The received wisdom, that large scale logistics is harmful, with no evidence to support that proposition, should be challenged by plan makers in pursuit of a robust plan.

2.3.9 Local Plans are sound if they are positively prepared '***providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs***' justified, effective and consistent with national policy.[36]

2.3.10 Guidance for plan makers as to how development needs are objectively assessed is provided in the 'housing and economic needs assessment' section of the web-based Planning Practice Guidance (PPG). Paragraph 031, last revised on 22 July 2019, is especially relevant:

> ***How can authorities assess need and allocate space for logistics?***
>
> *The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).*
>
> *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. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:*

[33] National Planning Policy Framework, December 2024, paragraph 86, part c
[34] National Planning Policy Framework, December 2024, paragraph 86, part e
[35] National Planning Policy Framework, December 2024, paragraph 87, part b
[36] National Planning Policy Framework, December 2024, paragraph 36

- *engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;*
- *analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;*
- *analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and*
- *engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.*

Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).

Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability.[37]

2.3.11 Given the strategic significance of the A14 corridor, a key national freight route extending from the Port of Felixstowe, through Greater Cambridge and onto the Midlands and acknowledged in the Councils' evidence base as a preferred location for large distribution units[38], a starting point of ruling such developments out is clearly inconsistent with planning practice guidance.

2.4 Key findings and recommendations

2.4.1 The received wisdom in Greater Cambridge, adhered to for the last 20 years, is that any large scale regional and national distribution would crowd out, displace or otherwise jeopardise economic uses that have been afforded greater priority. There is no evidence to support such a proposition.

2.4.2 The notion that the supply of land for Greater Cambridgeshire' specialist and target sectors is especially constrained does not stand up to scrutiny, noting that a significant increase in the need for industrial and small-scale distribution and warehousing floorspace has been accommodated, though the allocation of further land (in addition to that identified in First Proposals) for 240,000 sqm floorspace on the A14.

2.4.3 The assessment that led to this allocation, in common with previous assessments, addresses industrial uses and sub-regional distribution and warehousing needs only. This is because it

[37] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#economic-need paragraph: 031 Reference ID: 2a-031-20190722

[38] Greater Cambridge Warehouse and Industrial Space Needs, Final Report, March 2025, page 41, Table 5.1

is based on a past trend that has no trace of large scale regional and national distribution and warehousing development within it.

2.4.4 In the circumstances, the outright rejection of large-scale logistics is irrational and unsound, when further opportunities to allocate land on the strategically significant A14 have been identified, notably, the proposed development at Newlands Park Cambridge.

2.4.5 Newlands Park Cambridge would not - *does not* - displace Greater Cambridge specialist sectors, quite the opposite. Newlands Park Cambridge is in the right location to serve the needs of specialist sectors, supporting their growth, for example, their supply chains, the needs of their workforce. In the context of Greater Cambridge's *identified* supply of land for specialist sectors (936,144 sqm R&D) significantly in excess (x1.56) of identified needs (600,000 sqm).

2.4.6 There is an urgent need for further industrial and warehousing allocations: a requirement that is even more urgent, given the evidence of Greater Cambridge's significant growth potential, discussed below.

2.4.1 Greater Cambridge Growth Scenarios

2.4.1.1 The Greater Cambridge Growth Scenarios report[39] indicates that Greater Cambridge could experience substantially higher levels of development than currently planned, with up to **92,000 additional jobs above the Draft Local Plan baseline**. Much of this growth is expected to come from the expanding Mid-Tech and knowledge-based sectors, along with their associated supply chains. **The logistics sector will inevitably have to expand locally, significantly so, to support this economic expansion**.

2.4.1.2 This additional potential logistics demand reinforces the case for additional logistics provision to support these industries and their supply chains. The Government's ambitions for 100,000 to 150,000 new homes above baseline will drive further logistics demand. Having regard to industry benchmarks[40], the scale of additional logistics floorspace required would be substantial.

2.4.1.3 The scale of growth envisaged by Greater Cambridge Growth Scenarios report sits comfortably alongside Mayor Paul Bristow's recently launched (December 2025) Cambridgeshire & Peterborough Local Growth Plan, which urges *Government to back an ambition to triple the size of the local economy and unlock a future where people across the region can be "healthier, wealthier and happier".*[41]

[39] A report published in November 2025 commissioned by the Ministry of Housing, Communities and Local Government to explore the growth potential of the Greater Cambridge economy.

[40] https://www.knightfrank.com/research/article/2024-01-18-households-and-their-logistics-needs?utm_source=chatgpt&utm_medium=ai&utm_campaign=chatgpt_referral 109 sq ft of industrial and logistics space per household

[41] https://cambridgeshirepeterborough-ca.gov.uk/news/mayors-westminster-local-growth-plan-launch-calls-on-government-to-back-tripling-of-cambridgeshire-and-peterborough-economy/

3 Greater Cambridge Industrial and Warehousing Floorspace Requirement

3.0.1 This section reviews the industrial and warehousing floorspace assessment that informs the draft Local Plan. This is set out in the Greater Cambridge Employment and Housing, Needs Update 2024-2045, Final Report, September 2025, which incorporates the findings of Greater Cambridge Warehouse and Industrial Space Needs, Final Report, March 2025

3.0.2 These reports were prepared by Iceni Projects Limited on behalf of Greater Cambridge Shared Planning and are referred to here as the Iceni assessment / requirement / report.

3.0.3 Iceni *recommend that for plan making purposes, Greater Cambridge consider 317,000 sq.m the combined industrial and warehouse plan need*.[42] Iceni suggest that 40% of this total (127,000 sqm) should be for distribution, because:

> *the evidence indicates an unmet requirement for distribution premises for servicing final mile deliveries into Cambridge for both consumers and businesses. This could represent 3-4 parcel delivery firms (looking for 5,000 to 10,000 sq.m+ each). Whilst these have historically been serviced from beyond Greater Cambridge, there would be efficiency and sustainability benefits of near city servicing, recognising that demand will increase with population growth planned for new settlements / housing delivery at Waterbeach, Northstowe and Cambourne. There are also outstanding requirements for larger distribution centres for the SRN (notably A14 corridor) but it is less apparent that these have a Cambridge specific customer base.*[43]

3.0.4 The Iceni assessment is trends based, looking back over a period when development policies blocked the development of strategic scale distribution developments. We know that there was a need for such premises, because Iceni find evidence of outstanding requirements for larger distribution centres on the A14 Corridor.

3.0.5 In the circumstances, whether the assessment recommended by Iceni is a full assessment of need is open to question and considered below.

3.1 The Iceni Industrial and Warehousing Floorspace Requirement

3.1.1 Table 3-1 shows the components of Iceni's preferred industrial and warehousing needs assessment, with comment on each alongside. In summary, the assessment is based on net absorption observed over the ten year period to year end 2023, with adjustments made to

[42] Greater Cambridge Warehouse and Industrial Space Needs Final Report, Final Report, March 2025, page 46, paragraph 6.10
[43] Ibid, page 54, paragraph 6.24 (first sentence).

provide for frictional vacancy (7.5%) and a margin for competition and choice (2 years gross completions).[44] The adjustments add 47,000 sqm (17%) to the base position.

Table 3-1 Iceni preferred Industrial and Warehouse Floorspace Requirements, 21 year period, sqm

Component	Value plan period	Comments
Average net absorption (net take up) 2013 to 2024	270,000	Excludes R&D
Vacancy adjustment	47,000	We do have the unrounded net absorption estimate; the formula typically used for vacancy adjustment to 7.5% is: need+(need*(7.5/92.5))
Flexible margin	(e. 21,270 sqm vacancy plus 26,230 sqm margin)	The figure is not provided, but according to Iceni is equal to 10% of need[45] The value shown here is a proportionate estimate derived from Iceni's rounded requirement, less their requirement figure.
Need / Requirement	317,000	The annual figure is a rounded estimate (317,000 / 21)

Source, Iceni March 2025 and Stantec analysis

3.1.2 The adjustments made by Iceni are limited to future need, but do not remedy the current position, of low vacancy in the existing stock. Iceni note that industrial and warehousing floorspace totalled 771,245 sqm [46] with a vacancy rate of 5%. To achieve a vacancy rate of 7.5%, inventory would need to increase by 20,845 sqm, increasing Iceni's preferred plan period requirement to 337,844 sqm.

3.1.3 The revised preferred Iceni scenario addresses industrial market equilibrium, but does not model the effect of removing the historic embargo on regional and national logistics development. A more substantial flexible margin might go some way to address this point. Typically, Iceni tell us, a margin is typically based on 2 or 5 years of average gross completions or around 20% of total needs.[47]

3.1.4 A typical margin based on 5 years gross completions would add a further 56,675 to Iceni's preferred scenario, increasing the requirement for industrial and warehousing floorspace to 433,080 sqm (see table 3-2).

Table 3-2 Alternative Iceni assessment, net absorption based (sqm)

Component	Value plan period	Comments
Average net absorption (net take up) 2013 to 2024	270,000	As per table 3-1

[44] Greater Cambridge Employment and Housing Needs Update 2024-2045, September 2025, Page 50, paragraph 5.7
[45] Greater Cambridge Warehouse and Industrial Space Needs Final Report, Final Report, March 2025, page 46, footnote 27
[46] Greater Cambridge Warehouse and Industrial Space Needs Final Report, Final Report, March 2025, page 24, Table 24.
[47] Greater Cambridge Employment and Housing Needs Update 2024-2045, September 2025, Page 50, paragraph 5.7 and page 53, Table 5.3

Component	Value plan period	Comments
Future need vacancy adjustment	21,270	As per table 3-1
Current inventory vacancy adjustment	20,845	Uplift to 771,245 sqm inventory to increase vacancy from 5% to 7.5%
Flexible margin	82,405	5 years gross completions @ 16,481 per annum
Need / Requirement	394,520	-

Stantec analysis of Iceni March 2025 and September 2025, figures rounded to the nearest 5

3.1.5 The problem with typical approaches is that the situation in Greater Cambridgeshire is not typical, it is atypical. For that reason, if the Iceni evidence is to be relied upon, their gross completions estimate should include an adjustment for current and future vacancy, and an atypical margin of at least 30% should be applied. This returns a requirement for 507,260 sqm (see table 3-3).

Table 3-3 Alterative gross completion-based assessment (sqm)

Component	Value plan period	Comments
Average gross completions 2013 to 2024	346,100	Iceni estimate
Future need vacancy adjustment	28,065	Consistent with Iceni adjust to 7.5% vacancy
Current inventory vacancy adjustment	20,845	As per table 3-2
Flexible margin	112,250	30% of adjusted future need
Need / Requirement	507,260	-

Stantec analysis of Iceni March 2025 and September 2025, figures rounded to the nearest 5

3.2 Replacement Demand

3.2.1 Iceni consider the need for industrial space as a result of industrial losses, and state that many existing industrial premises are older stock and may not be fit for modern business purposes[48]. This is undoubtedly the case and modern EPC requirements (MEES) will serve to accelerate demand for modern industrial premises. All rental properties are expected to have an EPC rating of C by 2027 and B by April 2030[49].

3.2.2 According to Iceni's analysis of losses of B2 and B8 space, if stock losses continue between 2024 and 2045 in line with historic rates and between 25 – 50% of losses are replaced on new sites, there would be a need for floorspace on new sites of between 44,000 and 87,000 sqm

[48] Greater Cambridge Employment and Housing Needs Update 2024-2045, Final Report – September 2025, page 55, paragraph 5.18

[49] https://www.handelsbanken.co.uk/en/insights/articles/what-you-need-to-know-about-changes-to-energy-performance-certificates

under the six-year loss rate or 68,000 and 137,000 sqm under the long-term (2011 to 2024) loss rate.[50]

3.2.3 Replacement of losses should be additional to the requirements discussed above. It would be reasonable to use the long run loss rate, the mid-point of which is 102,500 sqm. This accords with the range (75,000 to 130,000 sqm) arrived at by Iceni in the context of *an increasingly ageing stock as well as pressures on EPC ratings*.[51]

3.3 Industrial Stock Losses

3.3.1 According to Iceni, using gross completions would effectively double count industrial stock as they believe that, as industrial occupiers move out of space, it is redeveloped/ reoccupied as new industrial stock. However, the case of Greater Cambridge is unique as lost industrial stock, historically, has been redeveloped for housing or research and development purposes and therefore the demand is not accounted for in gross completions trends.

3.3.1 Greater Cambridge Annual Monitoring 2023 – 2024[52]

3.3.1.1 In the employment monitoring section of the AMR report, industrial and logistics losses are discussed at the expense of R&D gains. The largest completions in this iteration of the monitoring report were the Cambridge Biomedical Campus and the new office development on the Sawston Trade Park. The biggest losses were on sites being redeveloped, such as Sawston Trade Park, where B2 manufacturing space was demolished to make way for new office space.

3.3.1.2 The AMR highlights Fulbourn Road East[53] as an allocation for employment land with a B8 use class however, there is a note that says this B8 use class is limited to data centres, so it is therefore unable to respond to regional and national logistics markets. The Dales Manor Business Park[54] allocation is allocated for residential development and B1 uses at the loss of 9 hectares of B2/B8 uses. Finally, Green End Lane Industrial Estate[55] is 4.09 hectares of previously B1/B2/B8 use class proposed for residential-led redevelopment (with at least 25% employment). These future allocations show that industrial space Greater Cambridge will continue to be displaced by other types of development, mainly R&D and residential. This further emphasises the need to use gross completions when determining future floorspace demand as industrial floorspace is not being redeveloped for industrial uses.

[50] Greater Cambridge Employment and Housing Needs Update 2024-2045, Final Report – September 2025, page 55, paragraph 5.20
[51] Greater Cambridge Employment and Housing Needs Update 2024-2045, Final Report – September 2025, page 55, paragraph 5.20
[52] Greater Cambridge AMR 2023 - 2024
[53] Policy E3
[54] Policy H1a
[55] Policy H1f

3.3.1.3 Over the past five years the total completed and committed employment floorspace and land for B2 and B8 is 36,331 sqm in Greater Cambridge. This, clearly, is not enough to meet the demand experienced by the industrial and logistics market. Additionally, over the past five years the net completed and committed employment floorspace and land for B2 and B8 is -9,319 sqm, meaning B2/B8 losses have occurred. Therefore, using gross completions, in this case, is more appropriate.

3.3.1.4 Looking at planning applications in Greater Cambridge over the past 10 years[56] at least 150 ha of industrial space has been lost to other use classes[57]. This amounts to a total of around 150 planning applications in the past 10 years listed in Greater Cambridge that have switched from a primarily industrial use to something else.

3.3.1.5 Table 3-4 shows examples of large sites in Greater Cambridge that have changed use away from industrial uses. The Spicers Site, Sawston provides an example of a B8 site that has been lost to another use class, as it is allocated in the draft local plan for redevelopment for R&D uses. Similarly, Coldham's Lane, Cambridge formerly a chalk quarry with associated industrial activities, is being redeveloped into a residential and R&D led redevelopment.

3.3.1.6 Additionally, the areas around Cambridge station, which were formerly used for freight purposes are being redeveloped into office space and lab space. Moreover, the former Ridgeons Builders Merchant is being redeveloped for housing.

Table 3-4 Examples of Change in Use Planning Applications away from industrial in Greater Cambridge

Ref	Application No	Address/ Site Name	Proposed New Use Class	Details
1	S/0158/20/FL	Spices Site, Sawston	E(g)(ii)/B1(b)	50,000 sqm allocated for R&D in the draft local plan.
2	18/0481/OUT	Coldhams Lane	Resi	Former chalk quarry. 1,200 dwellings.
3	23/04590/OUT	Cambridge East	R&D	Former chalk quarry. Use is for R&D and offices.
4	16/0963/FUL & 20/0485/FUL	Cambridge North Station Quarter, CB4	Offices / Labs	48,000 sqm of office / labs
5	19/1168/FUL, 20/03523/S73	CB1 – Cambridge Station Area	Offices / Labs	30,000 sqm
6	19/1168/FUL	Former Ridgeons Builders' Merchants, 75	C3 + F1	"Timber Works" – 295 homes (40 % affordable), nursery,

[56] Greater Cambridge Planning Portal/ Landstack.
[57] This includes planning applications that have a size attached to them. There will be a number of sites that have not got a size listed on their planning application, so the number is likely to be higher.

Ref	Application No	Address/ Site Name	Proposed New Use Class	Details
		Cromwell Road, CB1 3EZ		central park, basement parking
7	22/01982/FUL	Former Travis Perkins Depot, Devonshire / Mill Road, CB1 2BH	C3, F1, E	"Devonshire Gardens / Mill Yard" – 70 apartments, 11,000 m² flexible workspace, community pavilion, 1.55 acres public green space
8	17/2245/FUL	Mill Road City Depot, Cavendish Road / Hooper Street, CB1 2AJ	C3, E	236 dwellings (50 % affordable), community centre, flexible ground-floor commercial space, basement parking
9	24/04140/FUL	Thriplow Farm, Lodge Road, Thriplow	C3 (26 dwellings)	Demolish B8 farm warehouse; build 26 houses
10	25/01936/OUT	Land rear of Lyndhurst, Station Rd, Longstanton	C3 (outline for housing)	Redevelop B8 yard for residential; unit numbers TBC
11	24/04815/FUL	Deal Farm (Unity Campus), Cambridge Rd, Sawston	E(g) & re-configured B8	Replan existing logistics units; add 18,000 m² labs/office

Source: Greater Cambridge Planning Portal, Landstack

3.3.1.7 These examples illustrate that industrial land, particularly B2 and B8 sites, is being eroded across Greater Cambridge, predominantly through redevelopment for other uses such as R&D and residential-led schemes. This trend highlights a structural shift in land use dynamics, where traditional industrial functions are increasingly displaced rather than expanded.

3.3.1.8 In this context, it is important that employment land requirements are assessed based on gross completions rather than net absorption. 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.

3.3.1.9 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.

Vacancy Rates

3.3.1.10 Figure 2-1 shows the vacancy rates of all industrial properties in Greater Cambridge alongside those with the secondary types of R&D and distribution. Iceni cite a vacancy rate equilibrium of 7.5% in this report, meaning that, if the market is operating below this, there is not enough supply in the market.

3.3.1.11 The vacancy rate for all industrial properties was falling consistently from the end of 2018, reaching 1.2% in Q2 2024. Since then, it has been climbing and now stands at 5.7%.

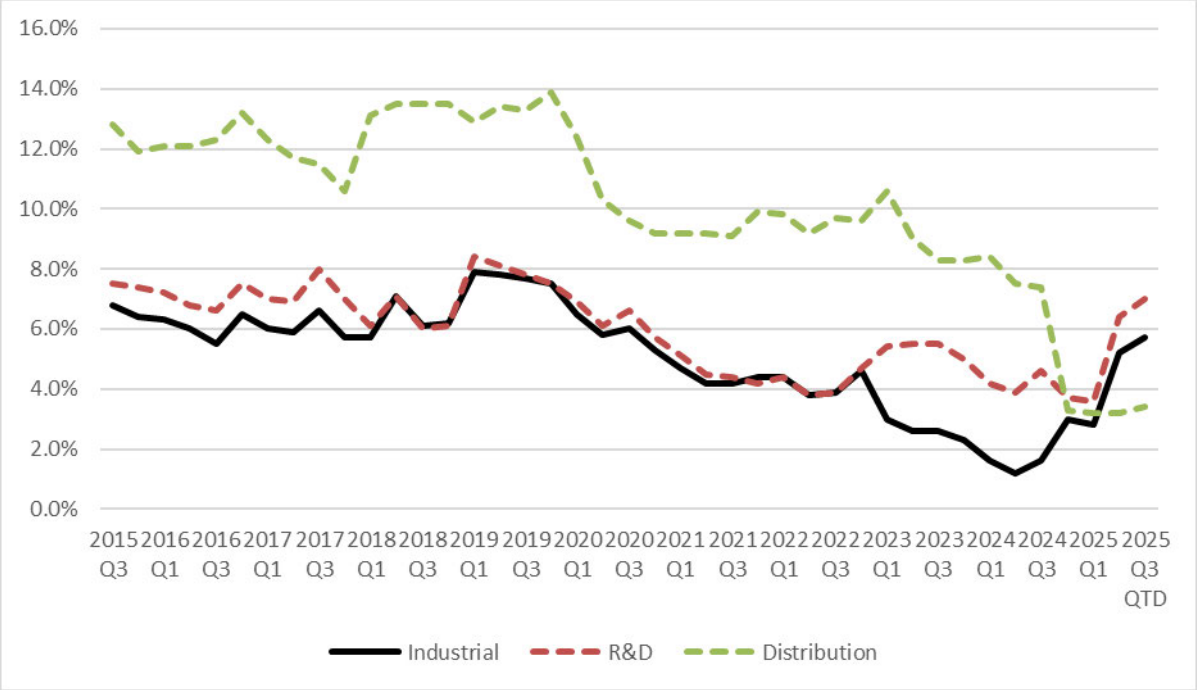
3.3.1.12 The R&D vacancy rate followed a similar pattern in that it was falling up until 2022, however, it then fluctuated more than the industrial vacancy rate and never hit the same low as seen in the overall industrial market. The R&D vacancy rate fluctuated between 3.5% and 6% between 2020 and 2025, although in the last two quarters of 2025, it has seen as sharp increase, reaching 7.0%.

3.3.1.13 Finally, in the distribution market, since 2019 the vacancy rate has fluctuated towards a downwards trend with a dramatic decrease from the latter half of 2024 hitting 3.4% in Q3 2025. This shows that changes in the industrial market vacancy rate are largely determined by the vacancy rate concerning R&D properties given this makes up a larger proportion of the inventory, as discussed above.

3.3.1.14 Whilst the R&D market has seen an increase in recent years, the distribution market has seen a sharp decrease in vacancy rates showing there has been an imbalance in the development of new R&D facilities and not enough supply of new distribution facilities.

3.3.1.15 The historically low vacancy rate underscores the necessity of utilising gross completions when forecasting employment land needs. This approach accounts for suppressed demand and the requirement for industrial and logistics buildings that may have been compelled to locate elsewhere due to insufficient supply in Greater Cambridge. Stantec's updated approach has been shown in Table 2-3.

Figure 3-1 Vacancy Rates Greater Cambridge split as all industrial, R&D, and Distribution



Source: CoStar, 2025

Aged Buildings

3.3.1.16 Using net absorption as opposed to gross completions ignores aged stock. Net absorption measures the change in occupied industrial and logistics floorspace over a given period and therefore reflects demand for functional, lettable space rather than total stock. In constrained markets with low vacancy rates, older or obsolete buildings that remain vacant and unlettable are excluded from net absorption figures, as no occupation change occurs. This means net absorption effectively captures the amount of employment-generating floorspace in active use but does not account for redundant or obsolete stock that exists physically but no longer contributes to market supply or employment activity.

3.3.1.17 Figure 3-2 illustrates the age of stock across Greater Cambridge for R&D and all industrial/ light industrial stock. The economic life of an industrial building is typically considered to be around 25 years, after which it is often deemed functionally obsolete. This is not necessarily due to structural failure, but rather because the building no longer meets modern operational, technological, or regulatory standards (e.g. EPC regulations).

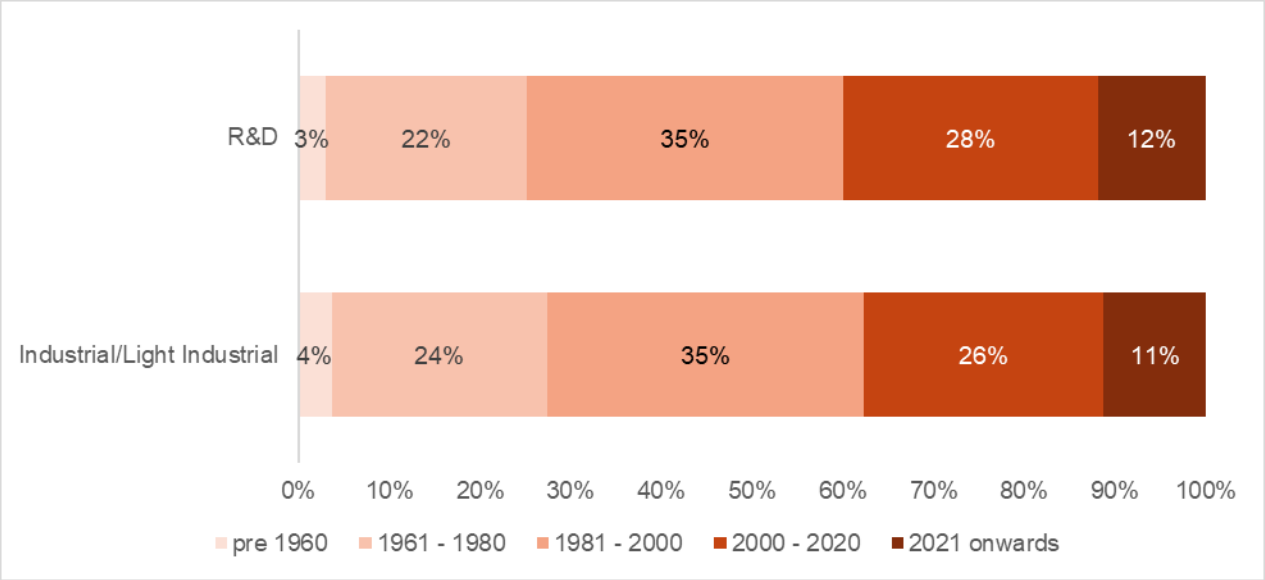
3.3.1.18 Over time, changes in industrial processes, advances in equipment, and evolving health and safety regulations can render older facilities inefficient or incompatible with current needs. Additionally, wear and tear, outdated layouts, insufficient eaves heights, limited power capacity, and a lack of flexibility for automation or green upgrades contribute to their declining utility. As a result, older industrial properties often require significant investment to remain competitive or are redeveloped entirely, marking the end of their initial economic usefulness.

3.3.1.19 38% of industrial/ light industrial premises are within their economic life, and for R&D this is 40%. This means that the remaining 62% and 60% is at the end of its economic life. With

regards to obsolete stock, 4% of industrial/ light industrial stock was constructed pre 1960 and 24% was constructed pre-1980. This is slightly lower for R&D as 3% and 22% respectively were constructed pre-1960 or 1961 to 1980.

3.3.1.20 This indicates that much of the stock in Greater Cambridge are not meeting modern industrial needs and are therefore unlettable and not included in net absorption figures. Because of this, gross completions is a better indicator of the real demand in the market given the constrained nature of the market.

Figure 3-2 Age of Stock Greater Cambridge

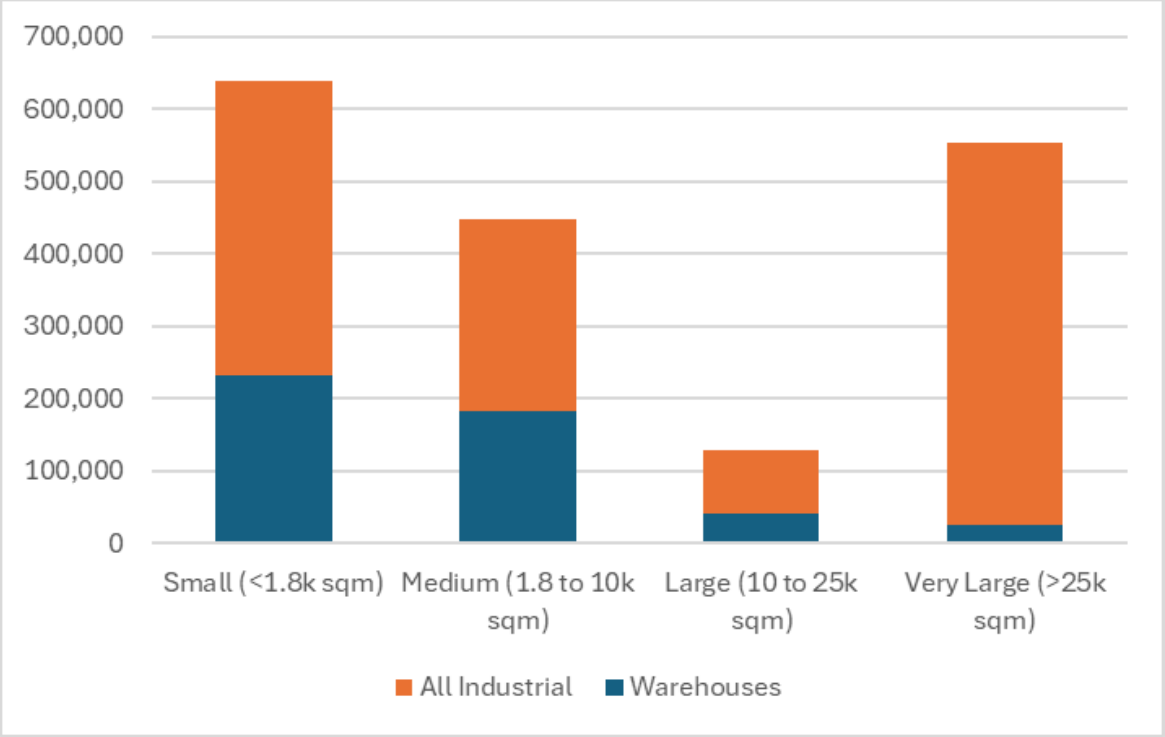


Source: CoStar and Stantec Analysis

Inventory

3.3.1.21 Warehousing, largely for distribution purposes, makes up a small percentage of overall industrial stock in Greater Cambridge, as shown on Figure 3-3. Overall, warehouses account for 27% of the industrial inventory in Greater Cambridge. The largest industrial facility is the Hexcel Composites factory, an advanced composite technology manufacturer, measuring 36,400 sqm. The largest warehousing site is the Former Spicers Site, Sawston, measuring 25,300 sqm. This site is allocated in the local plan to create 50,000 sqm of research and development space. This signifies how space for logistics is being lost in favour of R&D space and shows the importance of creating new modern facilities to make up for lost space.

Figure 3-3 Industrial and Warehouse Inventory (2025)



Source: VOA, 2025

3.4 Key Findings

3.4.1 Analysis of Iceni's assessment and the industrial and warehousing property market indicators presented in their analysis (inventory, vacancy, absorption and completions) provides a basis for developing an alternative assessment that addresses the following key factors:

1. A vacancy level consistently below market equilibrium.
2. Development management policies that have over the last decade prohibited the development of strategic scale regional and national distribution centres.
3. Industrial and warehousing floorspace losses.
4. The need to replace existing floorspace to address an increasing ageing stock and pressure from EPC ratings.

3.4.2 Independent analysis of stock losses and the planning pipeline corroborate points 3 and 4. Analysis of VOA data confirms the effectiveness of the ban on strategic scale warehousing (point 2). In the circumstances and based on the indicators presented in the Iceni analysis, a gross completions-based requirement is proposed plus a further requirement to address replacement losses

3.4.3 Using Iceni's gross completions estimate, applying adjustment for current and future vacancy (to 7.5%), and a margin of 30% returns **a plan period requirement for 507,260 sqm industrial and warehousing floorspace** (see table 3-3).

3.4.4 **In addition, to address industrial and warehousing stock replacement, a further 102,500 sqm should be added to the requirement**. This falls midway between the B2/B8 stock replacement range arrived at by Iceni.

3.4.5 This approach accounts for significant industrial land losses to other uses, particularly research and development and residential development. Many historic industrial sites, such as Coldham's Lane, and areas around Cambridge Station, have been permanently redeveloped, meaning vacated space is not replaced with new industrial floorspace. As a result, net absorption figures understate the true level of need by ignoring displaced or unmet demand arising from redevelopment pressures and structural change in land use patterns.

3.4.6 Moreover, the application of gross completions better reflects market dynamics within a context of persistently low vacancy and an ageing industrial stock. Vacancy rates in the logistics and general industrial sectors have remained well below equilibrium levels, reaching as low as 1.2% in 2024, while over 60% of existing premises are at or beyond their economic life and no longer suitable for modern operations. These conditions indicate a constrained market where functional, available stock is scarce.

4 Supply analysis

4.0.1 This section addresses the supply of industrial and warehousing sites in Greater Cambridge, starting with the supply identified in the Greater Cambridge Warehouse and Industrial Space Needs, 2025, which, in the supply position, incorporates (see Table 4-1) sites proposed for allocation in First Proposals (2021).

Table 4-1 Iceni (March 2025) Industrial and Warehousing Land Recommendations by Type and Location (sqm)

Type	Notional Need by type (sqm)	Supply (sqm)	Residual Requirement	Notional Approach to distributing residual need by type (sqm)	Preferred location
Manufacturing B2	47,550	Minus 6,390 net plus 91,200 First Proposals	c. -200,490 under supply	40,000 (10 ha) reflecting limited positive balance	Cambridge commutable
Distribution B8	126,800			100,000 (25 ha)	SRN location/ urban fringe for last mile
General Industrial B2/ B8/E(g) inc. trade/ wholesale	63,400			40,000 (10 ha)	Urban/ urban fringe/ access
Other uses	47,550				
Mid-tech B2/B8/E(g)	31,700	34,652 E(g)(iii)	Plus 2,952 (marginal oversupply)	15,000 (5 ha)	Enhanced urban connectivity/ urban fringe/ science park proximity
Total	**317,000**	**119,500**	**Minus 197,538**	**197,000**	

Source: Iceni, March 2025

4.0.2 At that time (prior to the publication of the consultation draft Local Plan in December 2025), Iceni recommended that 100,000 sqm (25 ha) of residual need should be for distribution uses.

4.0.3 The residual need calculation assumed that 91,200 sqm of floorspace would be delivered by the 'First Proposals'. These sites are considered below.

4.1 First Proposals

4.1.1 Iceni assumed that the two B2/B8 'First Proposals' (ref end SAS and BBP in Table 4-2) would yield 81,200 sqm (72,800+8,400 respectively), after applying a plot ratio of 0.40.

4.1.2 Table 4-2 presents an updated supply position for these two 'First Proposals' sites. Using a 0.35 plot ratio, which is more typical of mid-scale mixed industrial and logistics parks, the potential floorspace (sqm) is closer to 71,050 sqm.

Table 4-2 Potential allocations Identified in First Proposals (2021)

Ref	Site	Proposal (ha)	Plot Ratio	Potential Floorspace (ha)	Potential Floorspace (sqm)	Use Class	Ownership
S/RRA/ SAS	Land to the south of A14 Services	18.2	0.35	6.37	63,700	B2/B8	Private Owner / Cambridge Uni
S/RRA/ BBP	Land at Buckingway Business Park, Swavesery	2.1	0.35	0.735	7,350	B2/B8	Cambridge County Council
S/RRA/ SNR	Land to the north of St Neots Road, Dry Drayton	4.6				E(g)(i) Offices/ E(g)(ii) R&D/ E(g)(iii) Industrial	Paragon Land and Estates Limited Commercial Property e.g. Cambridge Innovation Park
S/RRA/ OHD	Old Highways Depot, Twenty Pence Lane, Cottenham	0.6				E(g)(i) Offices/ E(g)(ii) R&D/ B8	Private Owner
Total		**25.5**			**71,050**		

Source: First Proposals 2021

4.2 Authority monitoring reports

4.2.1 The Iceni report uses the 2021 Authority Monitoring reports to determine the supply position in Greater Cambridge. Within this authority monitoring report there are several sites listed as having B8 uses but, this is amongst other uses. For example, the Bourne Quarter development has B8 uses but this is ancillary to the larger research and development use. This is common amongst new schemes in Greater Cambridge. The 2021 authority monitoring report highlights a distinct lack of pure logistics space in favour of more mixed-use research and development, and light industrial led space.

4.2.2 Table 4-3 lists the employment sites identified in the Authority Monitoring Report (2023 – 2024). It shows that none of the sites are for logistics purposes and that the main focus is research and development, with some residential-led mixed use developments.

Table 4-3 Authority Monitoring Report Employment Sites (2023 – 2024)

	Site	Use Class
1	Cambridge Science Park	R&D
2	Cambridge Bio-Med	R&D
3	Fulbourne Road	R&D

4	Papworth Hospital	Redevelopment of existing hospital site
5	Histon and Impington Station Area	Residential led
6	Bayer CropScience Site	B1 and residential
7	Papworth Everard West Central	Residential led
8	Dales Manor Business Park, Sawston	Mixed R&D/ Industrial Site
9	Green End Industrial Estate, Gamlingay	Residential led

Source: Greater Cambridge Authority Monitoring Reports (2024)

4.3 Sites under construction, with planning permission or awaiting a decision

4.3.1 Considering sites that are under construction, have planning consent, or are currently going through the planning process, we can create a better position of what employment sites will be deliverable in the short to medium term.

4.3.2 As displayed by Table 4-4 there are in total nine sites that could be available for employment purposes in the short to medium term. All but one of these sites are for research and development purposes. The only site that is proposed for industrial and logistics proposes is Anderson Road which is a 4,518 sqm industrial site that is set to be demolished in favour of a newer, modern building.

Table 4-4 Current Sites

Ref	Name	Type	Sq ft	Sqm	Comments
Under Construction					
1	Accelerator Park, West Way	R&D	86,306	8,018	Campus for innovation tech, R&D and production uses.
Proposed - Consent Granted					
1	Anderston Road	Industrial	48,635	4,518	Detailed planning for demolition and construction of new warehouse.
2	Coldhams Lane	R&D	1,000,000	92,902	Planning consent granted for 23 acre science district.
3	Artemis	R&D	58,071	5,395	Planning consent granted. Forming part of the Unity life sciences campus.
4	Unit 420, 430 and 440 Cambridge Science Park	R&D	133,000	12,356	Permission Granted. Split across 3 buildings.
Proposed - Awaiting Decision					
1	Cambridge Research Park	R&D	301,392	28,000	Planning application for B1 (a,b,c) , B2, B8 uses.
2	Trinity Fall Farm Industrial Estate	R&D	412,616	38,333	Demolition of existing unit and development of use class Eg(i) offices and E(g)ii Research and Development.
3	210 - 240 Cambridge Science Park	R&D	214,957	19,970	Demolition of exisiting and redevelopment for class E(g)(i) offices and E(g)(ii) research and development.
4	Wellington Way, Bourne Airfield	R&D	83,960	7,800	Hybrid planning application for demolition of existing buildings and outline planning for use class E(g)(ii), E(g)(iii), and B8. The split will be revealed in the detailed planning application.
	Total		**2,338,937**	**217,293**	
		Total R&D	*2,290,302*	*212,774*	

Source: CoStar, Greater Cambridge Planning 2025)

4.3.3 The remaining sites that are deliverable in the short to medium term are for research and development uses. A shortage of logistics sites in Greater Cambridge would likely constrain the region's ability to support its fast-growing knowledge economy, since efficient supply chains are essential for research, life sciences, and advanced manufacturing. Without local space for warehousing and distribution, businesses face higher costs, longer delivery times,

and reduced competitiveness. This could displace jobs to other regions, limit new employment opportunities in logistics and related sectors, and ultimately slow overall economic growth by making the area less attractive for investment.

4.4 Sites proposed for industrial and warehousing uses allocated in the Draft Local Plan

4.4.1 Table 4-5 shows the industrial and warehousing sites that have been allocated in the draft Greater Cambridge local plan amounting to 300,000 sqm of floorspace.

Table 4-5 Logistics Site in the Draft Greater Cambridge Local Plan

Site Reference	Name	Site Area (hectare)	Description
S/SHF	Land north of A1307, Bar Hill (Slate Hall Farm)	113.3	• 200,000 sqm small to medium units. • Class B2 and B8 supporting local needs.
S/RRA/SCS	Land to the south of Cambridge Services, A14	24.58	• 90,000 sqm • B2 and B8 • 2.25 hectares for lorry parking.
S/RRA/BBP	Land at Buckingway Business Park, Swavesey	2.11	• 10,000 sqm • B2 and B8
	Total	**140**	**300,000 sqm**

Source: Draft Greater Cambridge Local Plan 2025

4.5 Key Findings

4.5.1 Updated monitoring reports (2023–2024) show that nearly all active and planned employment developments in Greater Cambridge are focused on research and development rather than logistics. With only one small industrial redevelopment scheme identified, there is effectively no pipeline for new logistics space, threatening the ability of local supply chains to support the region's fast-growing mid-tech, manufacturing, and life sciences sectors.

4.5.2 Although the draft Local Plan allocates around 300,000 sqm of logistics floorspace, this is insufficient to satisfy objectively assessed need. To address this shortfall and maintain economic growth, further allocations should be made to ensure Greater Cambridge has the capacity to accommodate local, regional and national distribution and warehousing needs.

5 The A14 and the Demand for Land for Large Scale Distribution

5.0.1 The A14 is a key transportation link connecting major cities, towns, and regions in the UK. It plays a crucial role in facilitating trade and logistics, particularly as it connects the Port of Felixstowe, one of the country's busiest ports, to the Midlands and other inland areas.[58]

5.0.2 The importance of the A14 in Greater Cambridge to regional and national distribution operators is recognised throughout Greater Cambridge evidence base. For the Greater Cambridge Partnership, the results of industry engagement published in 2021 concluded as follows:

> *There is high existing demand for B8 space in the Greater Cambridge area to service Cambridge and the surrounding area. This demand is not matched by supply, as all six companies looking for B8 space were struggling to find suitable sites. All of the companies indicated that B8 space was needed to meet the demand for delivery services within Cambridge itself. The regional companies would use B8 space to solely service Cambridge, but the four large-scale companies indicated they would ideally use the space to service the wider area in the east of England. The main constraints in finding suitable sites vary depending on the size of the company.*
>
> *The regional operators' main constraint in the Greater Cambridge area was price as they sacrificed proximity to Cambridge for cheaper rent. This is in comparison to the international companies, who are finding it difficult to find a site of suitable size (most want something in the region of 100,000 square feet (9,290 square metres)). The location and price of the sites mattered less to the international companies.*
>
> ***Logistic companies feel as though there is not enough dedicated B8 space in the Greater Cambridge area**, with manufacturing and science parks being prioritised over B8 space.*
>
> *The regional operators prefer to service Cambridge from the north, using the A10 as the main arterial link into Cambridge. The national operators were looking for B8 space to the west/ north-west of Cambridge due to proximity to the Strategic Road Network (SRN) and the ability to service Cambridge via the A14 and A428. It was confirmed that **Cambridge is a very good geographical location for the larger users of B8 space to serve the wider region/ surrounding counties.** However**, the lack of supply of B8 means that they must use B8 elsewhere, in less geographically optimal locations**.[59]*

5.0.3 Large premises undersupply is an inevitable result of the local planning policy ban on regional and national distribution developments. The Greater Cambridge EHEU Update, published in 2022 picks up the paucity of supply. Although it fails to connect a development embargo and

[58] A14 Cambridge to Huntingdon improvement, one year post-opening project evaluation, National Highways 2024
[59] Understanding demand for B8 premises across Greater Cambridge, WSP, June 30th 2021, page 2 under heading 1.4.

demand, the following commentary highlights the lack of 'big box' (c10,000 sqm plus) supply, and what it might mean (the Bury St Edmunds example) if large sites were made available:

> *Historically Cambridge has had limited demand for larger units but Brexit and COVID-19 alongside A14 corridor improvements have seen strong demand arise. Comparably Bury St Edmunds has seen 167,000 sqm of deals through speculatively built space. The 'big box' unit occupiers tend to have a sub-regional level of search which includes Greater Cambridge but extends beyond on the A14, A1(M) and M11 corridors.* ***There is reported big box demand for the wider Greater Cambridge area which is necessarily met in the wider sub region due to lack of supply****.*[60]

5.0.4 More recently, unmet demand for larger distribution centres is highlighted in Greater Cambridge Warehouse and Industrial Space Needs, March 2025, alongside unmet requirements for final mile sites:

> *Distribution: … There are also outstanding requirements for larger distribution centres for the SRN (notably A14 corridor) but it is less apparent that these have a Cambridge specific customer base.*[61]

5.0.5 The land requirements for large scale distribution warehouses that serve markets beyond the boundary of Greater Cambridge are explicitly excluded from the Greater Cambridge Warehouse and Industrial Space Needs, meaning they are in addition to Iceni's preferred floorspace requirement of 317,000 sqm. Nevertheless [*and for the reader, with the context of a longstanding ban on large scale operations and the market behaviour observed (locating, sub optimally, elsewhere) in mind*], unmet requirements of county, regional / supra-regional are acknowledged:

> *Distribution - at the outset it is important to acknowledge and differentiate between large scale distribution warehouses that serve Cambridgeshire County and the East of England region vs those serving the Greater Cambridge market specifically.* ***This study is concerned with those occupiers looking to serve the Greater Cambridge market,*** *whist acknowledging that some stakeholders identified requirements for strategic premises that could be located in Greater Cambridge or potentially elsewhere in the region / sub region given markets served.*
>
> ***Stakeholders were unanimous in the view that B8 space was lacking within Greater Cambridge – and some commentators indicating this stretched to the wider Functional Economic Market Area and beyond****. Given trends of rising demand in the distribution market and other market indicators this is likely to be the case.*
>
> *It was noted by agents that a lack of available warehousing units and land close to Cambridge required DHL, DPD and Hermes to locate in Huntingdonshire. DHL*

[60] Greater Cambridge Employment and Housing Evidence Update Employment Land, Iceni Projects, December 2022, Revised January 2023, page 47, paragraph 2.88

[61] Greater Cambridge Warehouse and Industrial Space Needs Final Report, Iceni Projects, March 2025, page 54, paragraph 6.24

> *are shortly to relocate from Papworth Everard in South Cambridgeshire to Huntingdonshire to a larger facility – as identified by DHL when visited by Iceni.*
>
> *Stakeholders highlighted that many products for distribution are imported from Felixstowe, by-passing Greater Cambridge to go to Huntingdonshire depots, and then later returning to the Cambridge area for delivery. This was not considered as efficient or sustainable as being able to locate closer to the Cambridge target market – although it is of note that this pattern is common throughout the country regarding national distribution centres.*
>
> *A study by England's Economic Heartland indicated* ***that without major distribution parks in Cambridgeshire (being the wider county not just Greater Cambridge), this could either lead to increased traffic and supply chain costs, or businesses moving out of the area and absorbing additional vehicle mileage****.*[62]

5.0.6 The Council's evidence is clear that the A14 in Greater Cambridge is a location where unmet requirements for large scale distribution operations would ideally be satisfied and that alternative location out with Greater Cambridge are suboptimal and economically harmful.

5.0.7 Regional and national distribution operators are increasing operating from buildings of large size and scale. For the UKWA Report 2024, Savills report that warehouses over 1m sq ft now make up 10% of the stock, up from just 3% in 2015[63]. That is a 345% increase in the number of warehouses over 1m sq ft[64], providing a clear market signal that this scale of building will be in the development mix required by regional and national operators with unmet requirements in Greater Cambridge.

[62] Ibid, page 36 and 37, paragraph 5.2 to 5.6.
[63] UKWA REPORT 2024 THE SIZE AND MAKE-UP OF THE UK WAREHOUSING SECTOR, page 7
[64] Ibid

6 Conclusion and Key Findings

6.0.1 The Proposed Development at Newlands Park Cambridge, adjacent to Junction 24 of the A14, represents a strategically located opportunity to meet a clear and growing need for modern logistics space in Greater Cambridge. The site's position on a key east–west freight corridor connecting the Midlands to the East Coast ports, combined with its proximity to Cambridge and the A1(M), makes it ideally suited for regional and national distribution operations. Its connectivity, accessibility, and scale provide the foundation for a high-quality, commercially attractive logistics park that will enhance the area's economic resilience and supply chain efficiency.

6.0.2 The received wisdom in Greater Cambridge, adhered to for the last 20 years, is that any large scale regional and national distribution would crowd out, displace or otherwise jeopardise economic uses that have been afforded greater priority. There is no evidence to support such a proposition.

6.0.3 The notion that the supply of land for Greater Cambridgeshire' specialist and target sectors is especially constrained does not stand up to scrutiny, noting that a significant increase in the need for industrial and small-scale distribution and warehousing floorspace has been accommodated, though the allocation of further land (in addition to that identified in First Proposals) for 240,000 sqm floorspace on the A14.

6.0.4 The assessment that led to this allocation, in common with previous assessments, addresses industrial uses and sub-regional distribution and warehousing needs only. This is because it is based on a past trend that has no trace of large scale regional and national distribution and warehousing development within it.

6.0.5 In the circumstances, the outright rejection of large-scale logistics is irrational and unsound, when further opportunities to allocate land on the strategically significant A14 have been identified, notably, the proposed development at Newlands Park Cambridge.

6.0.6 Newlands Park would not - does not - displace Greater Cambridge specialist sectors, quite the opposite. Newlands Park Cambridge is in the right location to serve the needs of specialist sectors, supporting their growth, for example, their supply chains and the needs of their workforce. In the context of Greater Cambridge's **identified supply of land for specialist sectors** (936,144 sqm R&D) significantly in excess (x1.56) of identified needs (600,000 sqm).

6.0.7 Analysis of Iceni's assessment and the industrial and warehousing property market indicators presented in their analysis (inventory, vacancy, absorption and completions) provides a basis for developing an alternative assessment that addresses the following key factors:

- A vacancy level consistently below market equilibrium.
- Development management policies that have over the last decade prohibited the development of strategic scale regional and national distribution centres.
- Industrial and warehousing floorspace losses.
- The need to replace existing floorspace to address an increasing ageing stock and pressure from EPC ratings.

6.0.8 Independent analysis of stock losses and the planning pipeline corroborate points 3 and 4. Analysis of VOA data confirms the effectiveness of the ban on strategic scale warehousing (point 2). In the circumstances, and based on the indicators presented in the Iceni analysis, a gross completions-based requirement is proposed plus a further requirement to address replacement losses

6.0.9 Using Iceni's gross completions estimate, applying adjustment for current and future vacancy (to 7.5%), and a margin of 30% returns a plan period requirement for 507,260 sqm industrial and warehousing floorspace (see table 3-3).

6.0.10 In addition, to address industrial and warehousing stock replacement, a further 102,500 sqm should be added to the requirement. This falls midway between the B2/B8 stock replacement range arrived at by Iceni.

6.0.11 This approach accounts for significant industrial land losses to other uses, particularly research and development and residential development. Many historic industrial sites, such as Coldham's Lane, and areas around Cambridge Station, have been permanently redeveloped, meaning vacated space is not replaced with new industrial floorspace. As a result, net absorption figures understate the true level of need by ignoring displaced or unmet demand arising from redevelopment pressures and structural change in land use patterns.

6.0.12 Moreover, the application of gross completions better reflects market dynamics within a context of persistently low vacancy and an ageing industrial stock. Vacancy rates in the logistics and general industrial sectors have remained well below equilibrium levels, reaching as low as 1.2% in 2024, while over 60% of existing premises are at or beyond their economic life and no longer suitable for modern operations. These conditions indicate a constrained market where functional, available stock is scarce.

6.0.13 Although the draft Local Plan allocates around 300,000 sqm of logistics floorspace, this is insufficient to satisfy objectively assessed need. To address this shortfall and maintain economic growth, further allocations should be made to ensure Greater Cambridge has the capacity to accommodate local, regional and national distribution and warehousing needs.

6.0.14 There is an urgent need for further industrial and warehousing allocations.

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Appendix 4 - Stantec Transport Technical Note (January 2026)

TRANSPORT NOTE

Date: 27th January 2026

Subject: **Newlands Park Cambridge – GCLP Regulation 18 Transport Note**

1. Introduction

1.1. Stantec UK Limited (Stantec) are appointed by Newlands Developments Ltd (Newlands) to advise on transport and access matters relating to the proposed Newlands Park Cambridge development on land adjacent to the A14 Junction 24 (Swavesey) junction in South Cambridgeshire.

1.2. This Transport Note (TN) has been prepared to accompany Representations for the site in response to Cambridge City Council and South Cambridgeshire District Council's consultation on their joint Regulation 18 Draft Greater Cambridge Local Plan (GCLP).

1.3. This TN should be read in the context of the full Representations prepared by Twenty5 Planning on behalf of Newlands, to which this TN is an appendix.

2. Structure of this Note

2.1. The remainder of this TN is split into three discrete sections, which seek to illustrate the key advantages of the proposed site location from a transport and access perspective. The three sections are:

- Access to the Strategic Road Network
- Shuttle Bus Routing
- Active Travel Catchment

2.2. This TN is focussed on these three items, but it should be noted that this is not an exhaustive list of transport and access measures and advantages of the proposed site location.

2.3. Each section includes commentary and accompanying full page landscape plan(s).

3. Access to the Strategic Road Network

3.1. A key advantage of Newlands Park Cambridge over other potential logistics locations promoted through the GCLP, is its direct and immediate connection to the Strategic Road Network (SRN) in the form of the A14.

3.2. Logistics and distribution uses are fundamentally reliant on efficient and reliable access to the SRN, 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. This in turn has the dual benefit of improving logistics performance while minimising the volume of HGV traffic on the surrounding local highway network, thereby reducing impacts on nearby communities and environmentally sensitive routes.

3.3. Newlands Park Cambridge is uniquely positioned in this regard. Vehicular access to the site will be taken directly from the southern dumbbell roundabout of the Swavesey Interchange (A14 Junction 24). This arrangement allows HGVs to join and leave the SRN within a very short distance of the site boundary, without reliance on minor roads, residential streets or constrained junctions.

3.4. To support this position, analysis has been undertaken to compare the distance and travel time required for HGVs to access the SRN at Newlands Park Cambridge compared with those with draft allocations in the GCLP. This analysis demonstrates that Newlands Park Cambridge benefits from materially shorter access distances and reduced travel times to the SRN, reinforcing its suitability as a strategic logistics location relative to alternative options.

3.5. The sites compared are as follows:

- Newlands Park, Cambridge
- Draft GCLP Policy S/RRA/SHF – Land north of A1307, Bar Hill (Slate Hall Farm)
- Draft GCLP Policy S/RRA/SCS – Land to the south of Cambridge Services, A14
- Draft GCLP Policy S/RRA/BBP – Land at Buckingway Business Park, Swavesey

Distance to SRN

3.6. The distances from each of the above sites to the A14 are set out in Table 1 below. For clarity, distances are measured from the assumed site access locations of the draft allocated sites and are rounded to the nearest 100m where distances are greater than 100m. The routes and analysis below are also illustrated in Figures 1-4 at the end of this section.

Table 1 – Comparative Distance to SRN

Site	Distance from Site Access (metres)				
	to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
Newlands Park Cambridge	50	400	50	400	**225**
Land north of A1307, Bar Hill (Slate Hall Farm)	1000	800	1000	1000	**950**
Land to the south of Cambridge Services, A14	1000	1500	400	1500	**1100**
Land at Buckingway Business Park, Swavesey	1300	900	900	900	**1000**

Travel Time to SRN

3.7. Observed traffic data collected in June 2025 has been used to derive the typical travel time required to access the SRN to/from each site during the typical AM and PM peak hours of 08:00-09:00 and 17:00-18:00 respectively.

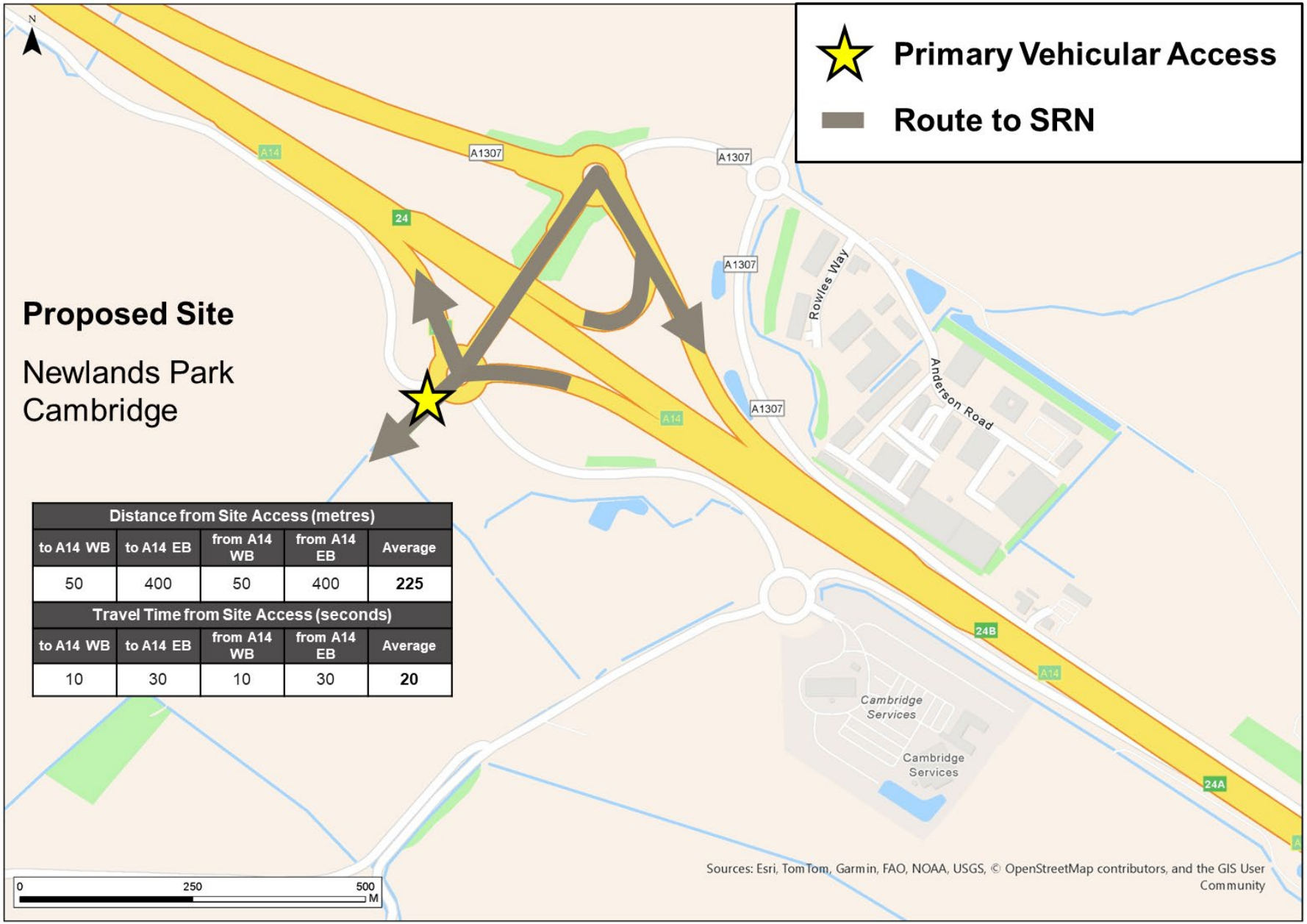
3.8. The travel time from each of the above sites to the A14 are set out in Table 2 below. For clarity, travel times have been calculated from the assumed site access locations of the draft allocated sites, are the average of the AM and PM peak travel times, and are rounded to the nearest 10 seconds. The routes and analysis below are also illustrated in Figures 1 and 2 at the end of this section.

Table 1 – Comparative Travel Time to SRN

Site	Travel Time from Site Access (seconds)				
	to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
Newlands Park Cambridge	10	30	10	30	**20**
Land north of A1307, Bar Hill (Slate Hall Farm)	90	70	70	100	**83**
Land to the south of Cambridge Services, A14	40	60	20	80	**50**
Land at Buckingway Business Park, Swavesey	60	20	60	20	**40**

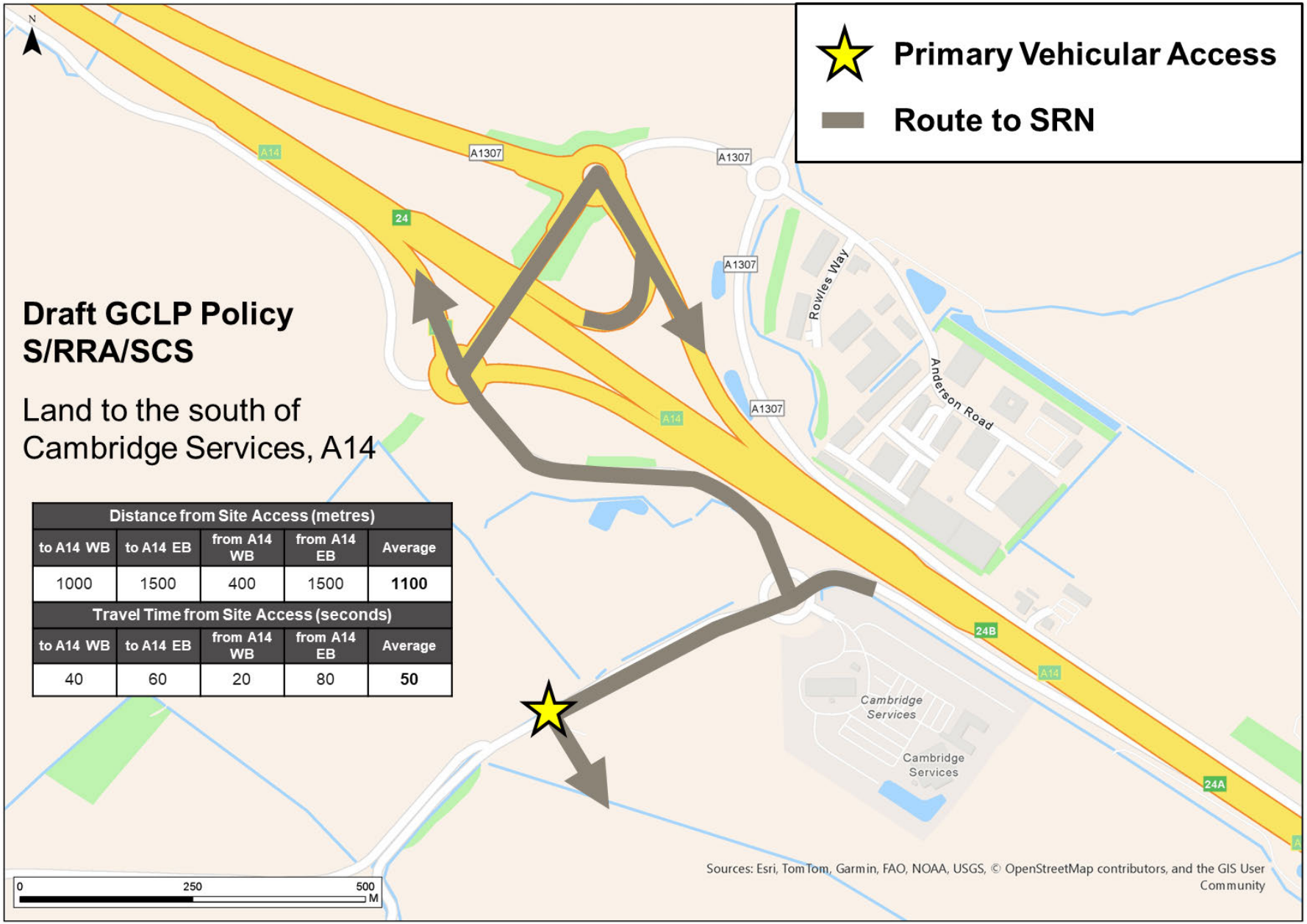
3.9. **Summary**

3.10. The comparative distance and travel-time analysis in Tables 1 and 2 highlights the strong strategic location of Newlands Park Cambridge in relation to the A14 Strategic Road Network. Direct access via the southern dumbbell roundabout at the Swavesey Interchange results in an average distance to the A14 of approximately 225 metres and an average travel time of around 20 seconds, reflecting the site's immediate connection to the SRN. By contrast, the other sites assessed require both longer distances and materially greater travel times for vehicles to reach the A14, with greater reliance on the local road network prior to joining the SRN. This direct and efficient access arrangement at Newlands Park Cambridge supports effective logistics operations, particularly for HGV movements, while limiting wider impacts on the surrounding highway network, reinforcing the site's suitability for strategic employment and logistics uses.



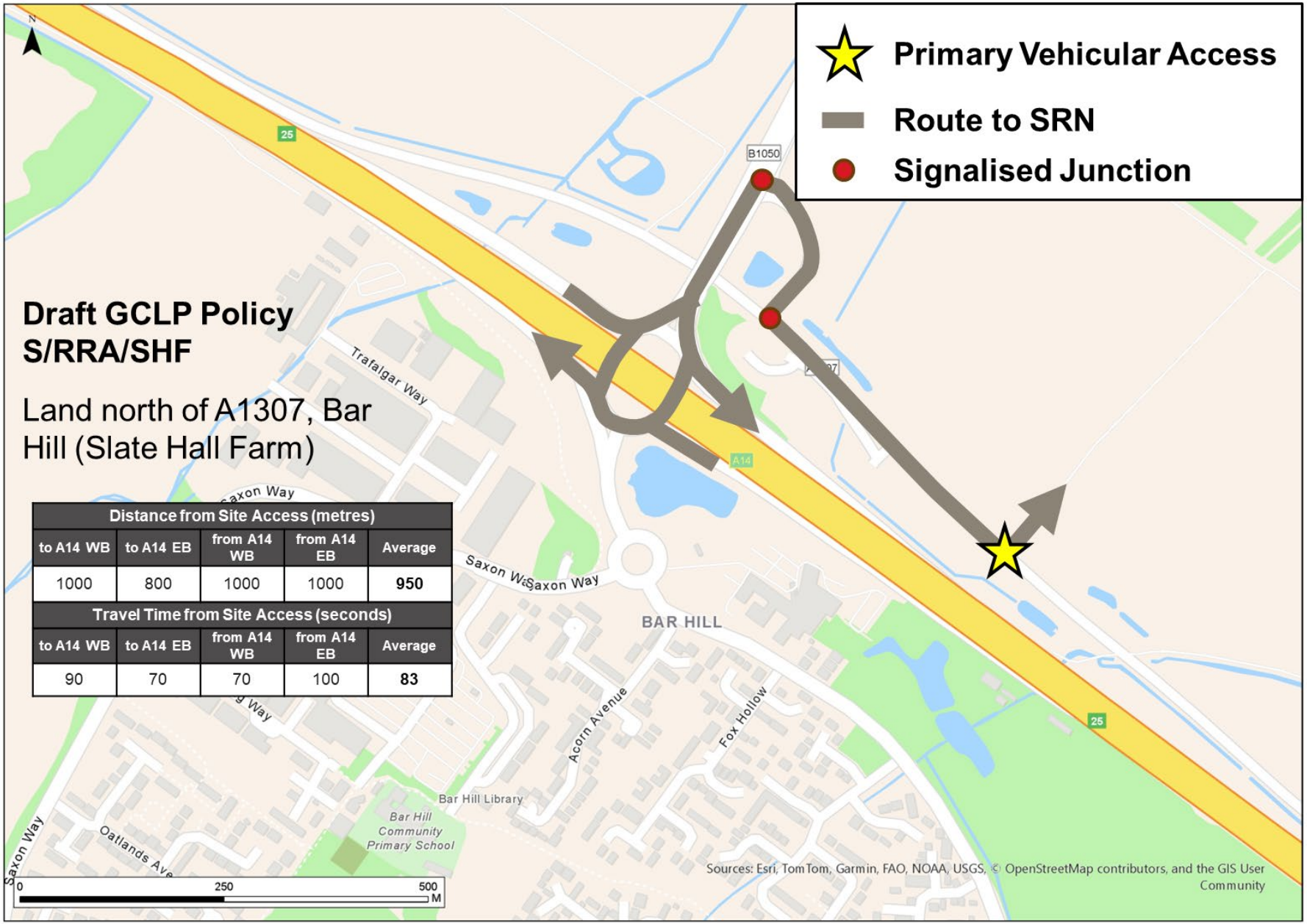
Distance from Site Access (metres)				
to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
50	400	50	400	**225**
Travel Time from Site Access (seconds)				
to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
10	30	10	30	**20**

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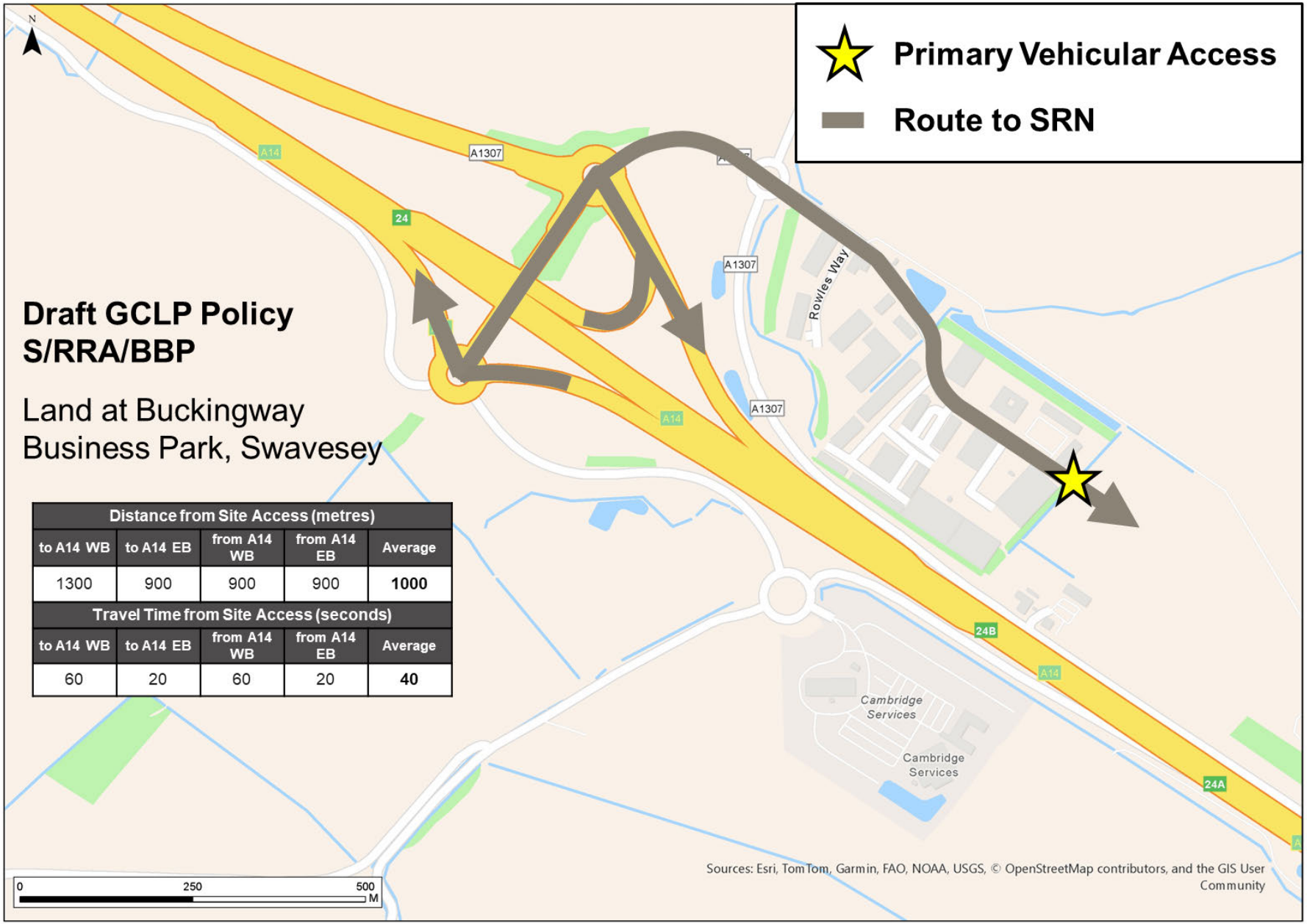


Distance from Site Access (metres)				
to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
1000	1500	400	1500	**1100**
Travel Time from Site Access (seconds)				
to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
40	60	20	80	**50**

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Primary Vehicular Access
Route to SRN
Signalised Junction
Draft GCLP Policy S/RRA/SHF
Land north of A1307, Bar Hill (Slate Hall Farm)
Distance from Site Access (metres)
to A14 WB | to A14 EB | from A14 WB | from A14 EB | Average
1000 | 800 | 1000 | 1000 | 950
Travel Time from Site Access (seconds)
to A14 WB | to A14 EB | from A14 WB | from A14 EB | Average
90 | 70 | 70 | 100 | 83
B1050
A14
25
Trafalgar Way
Saxon Way
BAR HILL
Acorn Avenue
Fox Hollow
Bar Hill Library
Bar Hill Community Primary School
Oatlands Ave
0
250
500
M
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Stantec



Distance from Site Access (metres)				
to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
1300	900	900	900	**1000**
Travel Time from Site Access (seconds)				
to A14 WB	to A14 EB	from A14 WB	from A14 EB	Average
60	20	60	20	**40**

4. Shuttle Bus Routing

4.1. The provision of shuttle bus services has been identified as a key component of the access strategy for Newlands Park Cambridge, with the potential to connect the site to a wide range of existing and future destinations across the wider Greater Cambridge and Huntingdonshire area. The purpose of these services would be to provide reliable, direct public transport connections for employees, reduce reliance on private car travel, and support sustainable travel choices in line with the GCLP objectives.

4.2. Newlands has demonstrable experience in successfully delivering comparable services elsewhere, including at Peterborough Gateway, where a public bus service has been implemented in partnership with the operator Transport Made Simple (previously Vectare). To illustrate this, 2024 patronage data is attached at Appendix A. This experience provides a strong precedent for the delivery, operation, and evolution of shuttle bus services serving employment uses, including working collaboratively with operators, local authorities and neighbouring occupiers to establish viable and well-used routes over time.

4.3. At Newlands Park Cambridge, the approach to shuttle bus provision can remain deliberately flexible and responsive to demand. Depending on occupier requirements and local context, services could initially be delivered as a private or semi-private shuttle, before evolving into a wider public service as patronage grows or as nearby development comes forward. There is also clear potential for services to be shared with, or extended to, serve other employment and residential uses in the local area, improving efficiency and maximising catchment areas.

4.4. Figure 5 (see overleaf) highlights a series of key existing and future nodes that could be served by shuttle bus services from the site. These include Huntingdon Railway Station, St Ives and St Ives Park & Ride, Longstanton Park & Ride, and key growth areas such as Huntingdon, Cambourne and Northstowe. Looking ahead, the site is also well placed to connect to the proposed Cambourne North railway station, planned as part of the East West Rail programme, and Cambourne to Cambridge busway, promoted by the Greater Cambridge Partnership. This reinforces the site's ability to support longer-distance sustainable travel as regional infrastructure is delivered.

4.5. Taken together, this demonstrates that Newlands Park Cambridge is well positioned to support a range of shuttle bus routing options, capable of evolving over time to respond to demand, occupier needs and strategic transport investment, while providing meaningful and attractive alternatives to private car travel from the outset.

4.6. The shuttle bus service would form one element of a wider package of measures proposed to reduce reliance on private car travel and promote sustainable modes at Newlands Park Cambridge, with a robust and evolving Travel Plan providing the framework to guide, monitor and adapt these measures over time.


Shuttle service potential origins/destinations
Opportunity to serve other similar existing and future development sites
St Ives
St Ives P&R
Huntingdon Rail Station
Godmanchester
Longstanton P&R
Bar Hill
Cambourne North
RAF Wyton
Needingworth
Hemingford Abbots
Brampton
Huntingdon
Swavesey
Fenstanton
Rampton
Northstowe
Cottenham
Huntingdon Road
Hilton
Elsworth
Impington
Milton
Yelling
Eltisley
Cambourne
Caxton
Cambridge
Abbotsley
Bourn
Little Gransden
B1040
B1514
A1198
A14
A428
A10
Milton Road
0 2.5 5 KM
Tiles: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

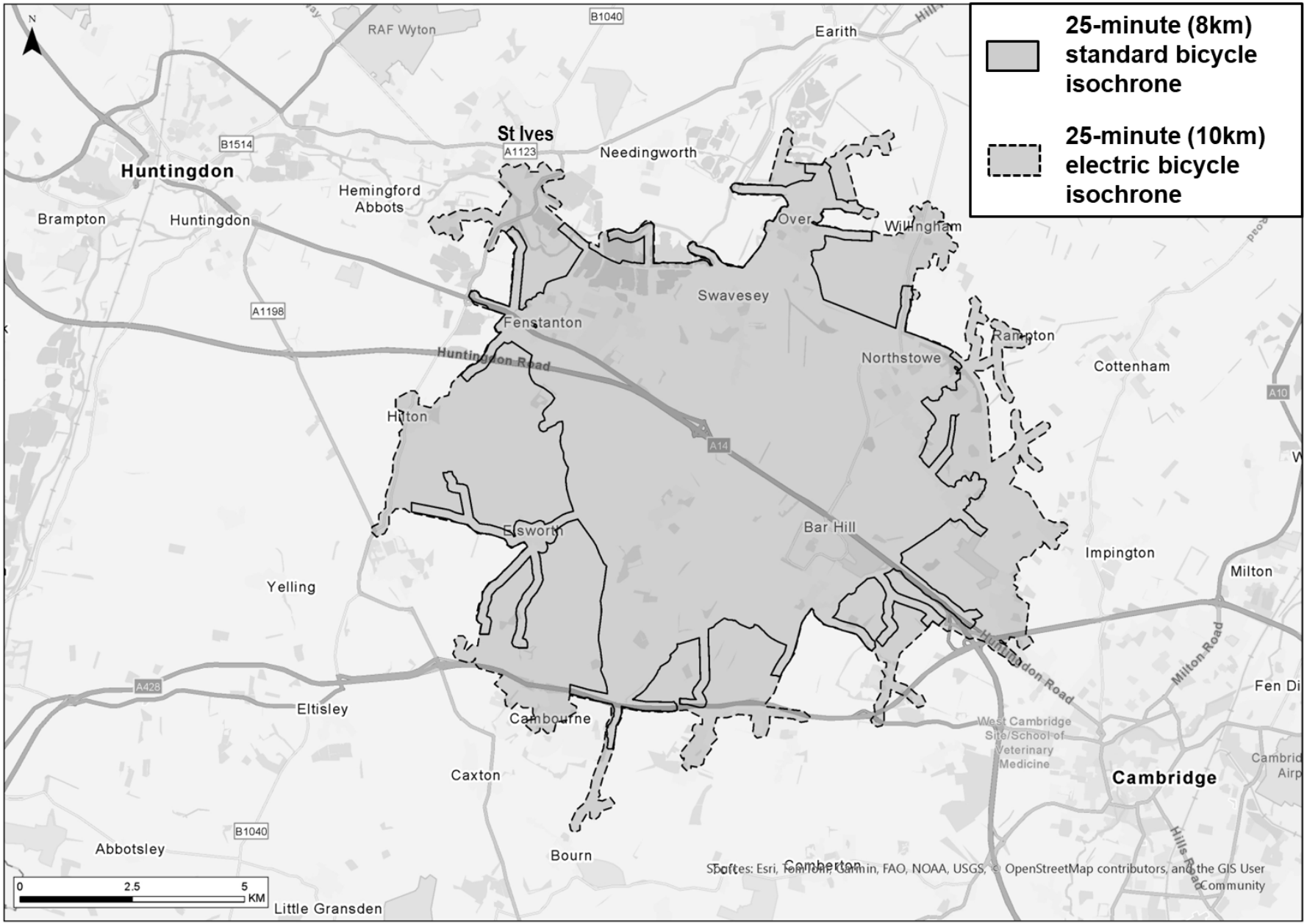
5. Active Travel Catchment

5.1. The potential for cycling to Newlands Park Cambridge has been assessed with reference to a 25-minute active travel catchment on Figure 4 (see overleaf). The accompanying plan illustrates the approximate cycling and e-bike catchments, defined as around 8 kilometres for conventional cycling and up to 10 kilometres for e-bikes, reflecting the extended range, reduced physical effort and higher potential speeds associated with assisted bicycles. These catchments encompass a number of nearby settlements, including Swavesey, Bar Hill, Longstanton, the majority of Northstowe, and the edge of Cambourne.

5.2. The site is therefore well placed to support a proportion of journeys by cycle and e-bike, and the development will actively promote these modes through high-quality on-site facilities, connections to the surrounding network and integration with wider route aspirations in the area. Active travel is expected to form an important part of the overall access strategy, particularly for employees living within the immediate catchment.

5.3. However, it is also recognised that the majority of workers are anticipated to reside beyond the practical cycling and e-bike catchment of the site. Evidence from labour analysis commissioned by Newlands indicates that a substantial proportion of employees are likely to travel from a broader geographic area, with high priority areas in settlements such as Huntingdon, St Ives and Godmanchester, located to the north-west of the site. For these journeys, cycling is less likely to represent a realistic primary mode choice, notwithstanding improvements to infrastructure and growing uptake of e-bikes.

5.4. In this context, the role of active travel at Newlands Park Cambridge should be viewed as complementary to, rather than a substitute for, the wider sustainable transport strategy. While walking, cycling and e-biking will be strongly encouraged where feasible, the needs of the wider workforce will primarily be addressed through the shuttle bus strategy set out in the preceding section, providing access to key rail stations, Park & Ride sites and larger settlements beyond the cycling catchment. Together, these measures ensure that Newlands Park Cambridge can support sustainable travel choices across a broad and realistic employee catchment.


25-minute (8km) standard bicycle isochrone
25-minute (10km) electric bicycle isochrone
N
RAF Wyton
B1040
Earith
St Ives
A1123
Needingworth
B1514
Huntingdon
Hemingford Abbots
Brampton
Huntingdon
Over
Willingham
Swavesey
A1198
Fenstanton
Rampton
Huntingdon Road
Northstowe
Cottenham
A10
Hilton
A14
Bar Hill
Impington
Milton
Elsworth
Yelling
Milton Road
A428
Eltisley
Cambourne
West Cambridge Site/School of Veterinary Medicine
Caxton
Cambridge
B1040
Abbotsley
Bourn
Comberton
Little Gransden
0
2.5
5
KM
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Appendix A – Newlands Peterborough Gateway Bus Service Performance (2024)

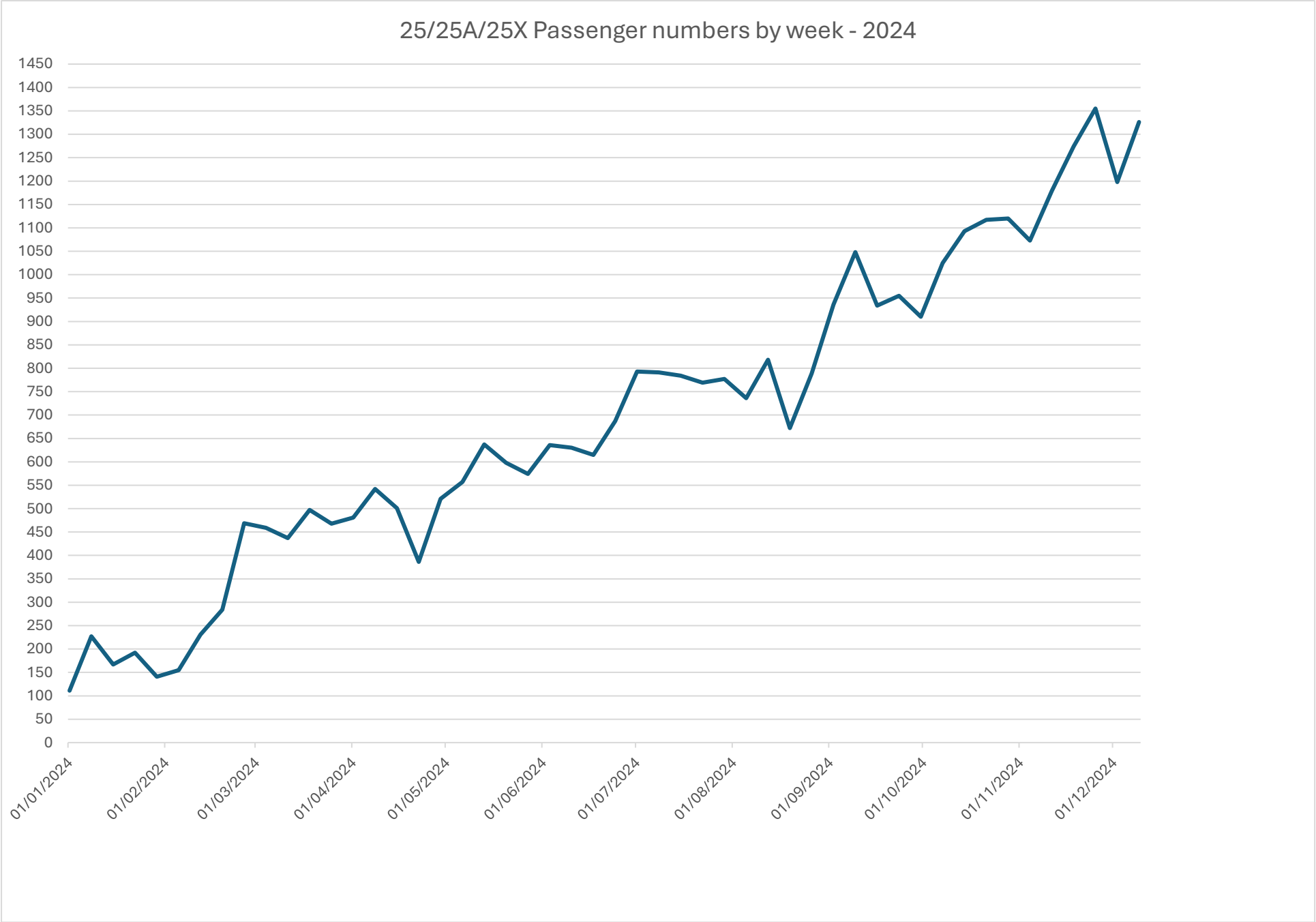
DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
332210779/R18TN	-	27.01.26	BK	JC	PL	PL

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E: cambridge.uk@stantec.com

Newlands Peterborough (Alwalton Hill) – new bus service performance, 2024:



Appendix 5 – Bidwells Advisory Note (November 2024)

BIDWELLS

Our ref: WRS/AJWZ/
DD: [redacted]
E: [redacted]
Date: November 2024

Mr Ben Taylor
Head of Planning
Newlands Developments
Suite D, Building 500
Abbey Park
Stareton
Kenilworth
Warwickshire
CV8 2LY

Dear Ben,

NEWLANDS PARK CAMBRIDGE

Further to recent discussions, you have instructed Bidwells to consider the market need for employment development at Newlands Park Cambridge which is adjacent to the A14. This report examines the demand and supply dynamics of the commercial market in a national, regional and local context.

Executive Summary

Market Context
There is a severe shortage of good-quality industrial and logistics stock combined with limited deliverable land for development within Cambridgeshire and the wider regional industrial and logistics market;

There is only one site (Lancaster Way, Ely) with outline planning consent for both B2 & B8 uses currently available in Cambridgeshire for occupiers seeking space > 100,000 sq ft;

There are currently only six existing industrial buildings over 100,000 sq ft available in Cambridgeshire, one of which is tenant 'grey space'. All are older 'Grade B' stock. There are no 'Grade A' buildings available for occupiers;

Large manufacturers such as food & drink manufacturing, high-performance technology, engineering and creative sector-related industries have wide geographical search areas and are often footloose. They will choose to locate where their search criteria are best satisfied and land / buildings are deliverable. This, combined with the lack of available space in Cambridgeshire, is likely to compromise future employment growth in the area;

From the requirements we have set out later in this report, it demonstrates there is currently approximately 13.3m sq ft of live enquiries (as at November 2024) from occupiers specifically interested in being located in the Eastern Region. It is difficult to categorically say which planning uses these fall into as some will have multiple, but these can be broadly split as follows:

- E(g) & B2: 4.3m sq ft;
- B8: 9m sq ft.

Nationally and locally, take-up of warehousing space has been at record levels over the past few years, albeit 2023 and H1 2024 saw a move back to more normal market levels. Occupiers' flight-to-prime

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strategy remains a focal point, especially for major corporations. Flight-to-prime is a key theme of the market as efficiency savings and ESG requirements are increasingly becoming key must-haves from a wider range of occupiers.

Conclusions

The land offers a deliverable opportunity to attract investment from large employers, significant benefits to the local economy and support the proposed future economic growth of the area;

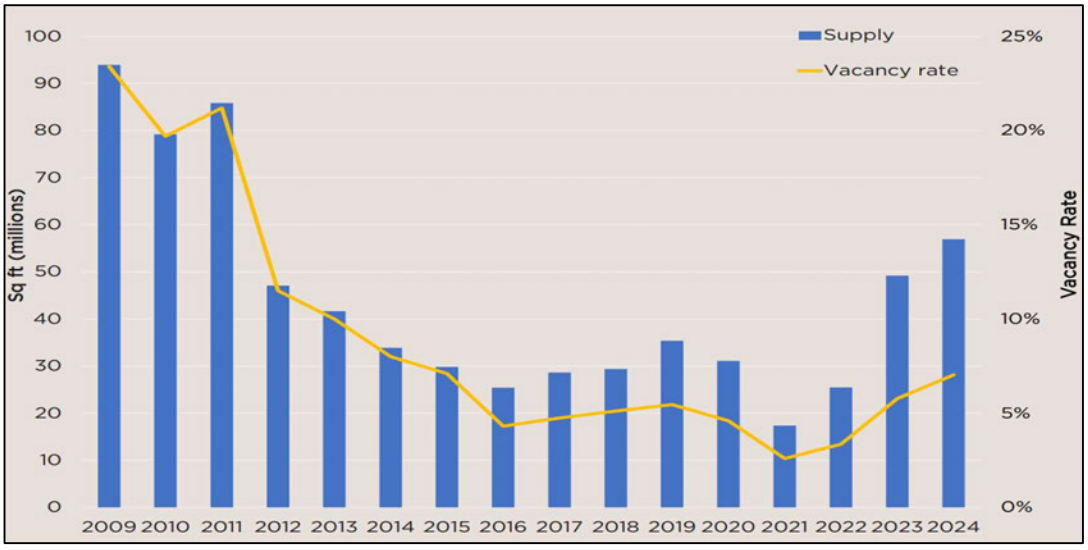
The large scale of the development site requires a long-term commitment to ensure the scheme attracts short and medium-term investment which acts as a catalyst to attracting future employers into the locality.

National Market Context - Supply

Across the whole of the UK, the supply of vacant existing units over 100,000 sq ft (9,295 sq. m) currently stands at approximately 56m sq ft, reflecting a vacancy rate of 6.95%[1]. This has risen significantly over the past 6 - 12 months, with an increased level of occupier-controlled supply on the market and a number of speculative completions throughout 2023 and H1 2024. The current vacancy rate is marginally higher than the pre-Covid average of 6.3%.

It is expected that this will start trending downwards as current supply is acquired and the development pipeline is not replenished as quickly. There is c.10m sq ft in the development pipeline for delivery in 2024 and 2025.

UK Supply of vacant floorspace (units over 100,000 sq ft)



Source: Savills Research

Occupier mix

A closer look at the demand profile reveals the cause of the annual drop in take-up. In 2022 pure online retailers (e.g. Amazon) were comparatively less acquisitive and accounted for only 9.2% of total take-up as opposed to 33.3% in 2020 and 45.2% in 2021. Third party logistics providers took the most space in 2022 resulting in a share of 44.5%. They were followed by general retailer/wholesale occupiers, recording a 18.4% market share, with manufacturers and others accounting for 18.1% and 9.8% respectively. Equally in 2023, online commerce players were not particularly active, but it's been witnessed that some of the best-known household names are gearing up for a busy 2025.

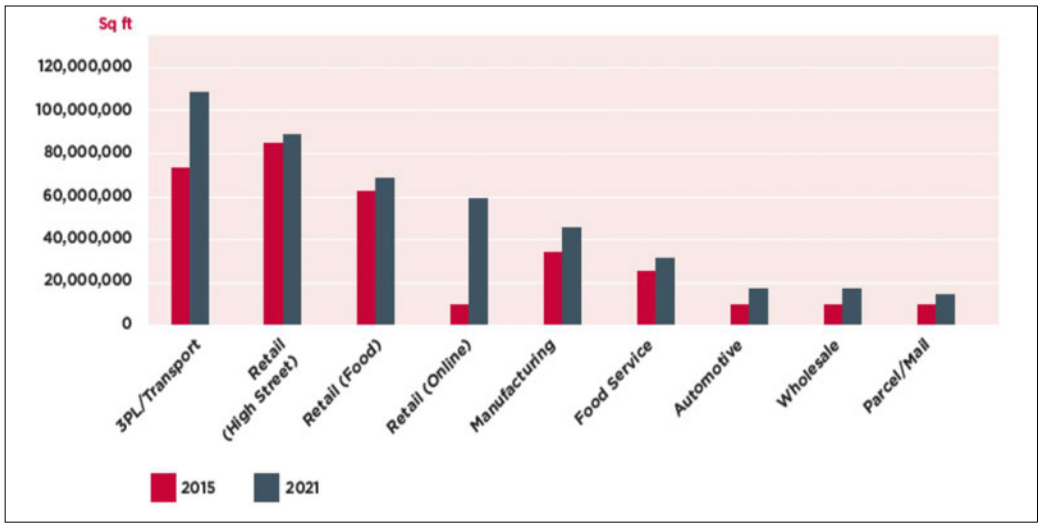
[1] Source: Savills Research

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The largest UK deal of the year in 2023 took place in Q4, with Segro's disposal of a development plot at Segro Logistics Park, Northampton, where Amazon has plans to build a circa 2m sq ft, multi-tier warehouse. Nearby, Zara secured the speculatively developed 625,336 sq ft warehouse DIRFT 627, Daventry and in the South East, the standout deal from 2023 was Tesco's commitment to a 620,000 sq ft distribution centre at Panattoni Park Aylesford in Kent. Further significant deals have happened in the first half of 2024, with Yusen Logistics committing to a new 1.2m sq ft unit at Segro Logistics Park, Northampton; Nike committing to a new 1.3m sq ft campus-style unit at Magna Park, Corby; Bleckmann taking a c.600,000 sq ft speculatively developed unit at Magna Park, Corby and Sizewell C taking over 1m sq ft at Orwell Logistics Park, Ipswich.

Occupier demand for logistics space is increasingly wide-ranging, with take-up coming from a diverse range of occupiers including; Third party logistics (3PLs), retailers, manufacturers and supermarkets, but also other less traditional logistics occupiers such as data centres and motor trade. Take-up from online retailers is down significantly from 2021 where they dominated the sector. This has fallen in line with a reduction of internet sales as a percentage of total retail sales, from it's high of 37.8% in January 2021, to the current ratio of 26.7% (as at July 2024). 3PLs continue to dominate the take-up, significantly exceeding any other sector type. The move to 3PLs is being driven by a number of factors including; occupiers outsourcing their supply chain to achieve greater flexibility, difficulties in sourcing labour and increasing transport costs. Furthermore, on-going supply chain disruptions are pushing occupiers across the retail and manufacturing sectors to increase their stock profile and increase near-shoring. This is leading to an increased reliance on 3PLs as occupiers do not have the necessary infrastructure to deal with increased levels of stock.

The following charts demonstrate how the occupier market share has changed over recent years:



Source: UK Warehousing Association

Manufacturing has also grown more than threefold, from 7% to 23% between 2010 and 2018, growing by nearly 50% over the last six years. In 2023 and H1 2024, manufacturing-related deals accounted for nearly 30% of market transactions, the highest levels since 2017.

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Demand trends

In the industrial and logistics sector there are a range of factors which combine to determine the occupier's choice of location, including:

- The availability of suitable buildings / land;
- The diversity of routes available from a location and congestion;
- The availability of labour and power, particularly for manufacturers;
- Reliability of the transport solution (and available alternatives);
- The growth in carbon taxes;
- Social responsibility and corporate governance.

The ability to hold, consolidate and distribute goods in HGV-size loads from one location is the most efficient method of organising supply chains for manufacturers, hence the development of both national distribution centres (NDCs) and regional distribution centres (RDCs). This is not only in terms of pure costs – consolidating and distributing 'mixed loads' results in fewer HGV journeys being required, resulting in environmental benefits.

Manufacturers make up an important component of the sector. They are more likely to store and distribute goods to suppliers or retailers direct from a production site. However, some manufacturers do occupy distribution centres where there is limited space on site or where they have a number of factories and there are benefits to consolidating storage. In addition, some manufacturers locate their storage facilities close to their customers, in order to meet their strict just-in-time delivery arrangements, particularly in the automotive industry.

Current Available Units > 100,000 sq ft in the regional market

There are currently a number of existing buildings available > 100,000 sq ft within the regional market (see following table), although these vary in quality. Given the current economic uncertainty and the correction in the industrial investment market, developers are being more cautious in their decision-making in relation to speculatively building. A number of sites are now unlikely to be developed out without pre-lets or pre-sales in place where they would have been 18 - 24 months' ago. Ultimately, this will impact supply and once the existing units are taken out of the market over the coming months, it will leave very limited choice for occupiers seeking a facility, particularly those seeking a modern facility in Cambridgeshire:

IMAGE	UNIT	COUNTY	GRADE	SIZE (SQ FT)	QUOTING RENT (PSF)
	Cardinal North, Cardinal Park, Godmanchester, Huntingdon	Cambridgeshire	B	99,670	£9.00
	Ideal Home House Newark Road Peterborough	Cambridgeshire	B	108,903	£6.50

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IMAGE	UNIT	COUNTY	GRADE	SIZE (SQ FT)	QUOTING RENT (PSF)
	Barnack House, Southgate Way, Orton Southgate, Peterborough	Cambridgeshire	B	161,245	£6.15
	Peterborough 736 Kingston Park, Flaxley Road, Peterborough	Cambridgeshire	B	736,708	£7.50
	Crossdock 252, Stukeley Meadows Ind. Est. Huntingdon	Cambridgeshire	B	251,746	£9.00
	Units 4, 5 & 6, Elean Business Park, Sutton, Ely, Cambridge	Cambridgeshire	B	167,793	£5.75
	Shepherd's Grove IE, Stanton, Bury St Edmunds	Suffolk	C	185,375	£4.50
	Mendlesham Industrial Estate, Mendlesham, Suffolk	Suffolk	C	130,000	£4.50
Total		**1,841,440**			

As per the table above, there are a number existing units above 100,000 sq ft available in Cambridgeshire currently, but the majority are lower or poor quality and largely 1980s or 1990's-built units. Peterborough 736 is tenant 'grey space' (Amazon), available by way of assignment or sublease only. There are currently no existing Grade A units available in the region.

Immediate Market

Focusing on Cambridgeshire specifically, the supply of industrial floor space has increased slightly over the last 6 months but remains at a very low rate of just 3.0%, highlighting the enduring shortage of accommodation. Two new schemes at Gateway Cambridge, Bar Hill (107,330 sq ft) and Phase 1 at Bourn Quarter, Bourn (288,000 sq ft) have brought forward much-needed stock over the past couple of years, albeit Gateway Cambridge is a redevelopment of an existing industrial park of similar floor space. As such, it is not considered as additional capacity, but re-provision of existing stock. Both schemes are now fully let and the success of both is a testament to the limited options for occupiers around Cambridge.

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Take Up in the regional market

In terms of take-up, mirroring the national picture, 2021 and 2022 saw record levels across the Eastern Region, with nearly 4m sq ft of take-up in both years, and a particularly strong finish to 2022. It is not therefore surprising that take-up in 2023 and the first half of 2024 was significantly down on these levels, particularly given the significantly more challenging economic conditions, as mentioned in previous paragraphs. Take-up in 2023 was recorded at 624,000 sq ft across four transactions, which is a c.50% fall below the long-term annual average. Take-up to this point of 2024 is around 1.2m sq ft, so much closer to the long-term average.

Set out below is a table of recent transactions which demonstrates the size, type and location of activity in the market over the past c.18 months.

IMAGE	DATE	ADDRESS	SIZE	TENANT	HEADLINE RENT (PSF)
	July 2024	Orwell Logistics Park, Ipswich	1.1m	Sizewell C	c.£7.50
	May 2024	SP128, Suffolk Park, Bury St Edmunds	128,000	Greene King	FH Sale
	July 2023	Unit 5 Port One Logistics Park, Ipswich, IP6 0RL	243,511	Hemisphere Logistics	FH Sale
	June 2023	Former DSV Unit Oxney Road, Peterborough PE1 5YP	129,507	Frederic Smart	£4.63
	February 2023	Lightning 126, Lightning Park, Huntingdon	126,689	DHL	£9.50
	January 2023	Nordic House, Sawtry, Huntingdon, PE28 5XN	124,134	Comtec Cables	£4.74 (Assignment)
	December 2022	PS140 Peterborough South, Kingston Park, Peterborough	139,915	FreshLinc	£7.50

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IMAGE	DATE	ADDRESS	SIZE	TENANT	HEADLINE RENT (PSF)
	December 2022	PS241 Peterborough South, Kingston Park, Peterborough	240,830	Taylor Wimpey	£7.15
	October 2022	SP160 Suffolk Park, Bury St Edmunds	160,000	Greene King	£7.75
	October 2022	Ideal Home House, Newark Road, Peterborough	125,046	Sportsdirect Retail	£6.25
	October 2022	Gateway 14, Stowmarket	1,172,160	The Range	FH Sale
	June 2022	Suffolk Park, Bury St Edmunds	394,454	Bleckmann	£7.25

Regional market demand

In the context of the south east A14, M11 and A1(M) corridors, occupier demand remains strong, as set out in previous sections. Gathering pace since 2018/2019 and setting record take-up levels in 2021 and 2022, demand for big-box and mid-box has been relentless, with all quarters showing demand growth, bar Q4 2019, which was affected by Brexit and election uncertainty. Due to the lack of available buildings, demand in the build-to-suit and land purchase sectors have grown significantly. Peterborough Gateway has been an example of this, where over 2,200,000 sq ft has been acquired via this method within just a three year period.

The table below sets out the recent demand for the area. It demonstrates both the diversity and type of occupier who have a registered requirement in the market since 2020 which remains unsatisfied.

Regional Market Requirements

OCCUPIER / AGENT	SIZE (SQ FT)	PLANNING USE	COMMENTS
c/o Louch Shacklock	250,000	B8	3PL client Looking for space around Newmarket + 20 miles.
Amazon c/o CBRE	400,000	B8	Seeking site for next day fulfilment to service Cambridge.
c/o Avison Young	200,000	B8	Feasibility study for corporate client. Looking for 10 – 25 acres of FH land or FH turnkey solution in A1 corridor.

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OCCUPIER / AGENT	SIZE (SQ FT)	PLANNING USE	COMMENTS
Acushnet	300,000	B2/B8	St Ives occupier looking for major expansion. Manufacture and distribute golfing equipment.
TWI	250,000	B2/B8	Currently based on Granta Park, Cambridge. Looking for new facility in close proximity to Cambridge to move to allow redevelopment of their existing site.
Aliaxis	250,000	B2/B8	Huntingdon occupier looking for major expansion. Manufacture & distribute pipes etc.
c/o CPCA	175,000	B2/B8	Requirement from Department for Business and Trade for a French Bakery. Looking for FH land purchase along the M1/A1/A1M corridor.
c/o CBRE	150,000	B2/B8	Norfolk/Suffolk requirement looking for 2025.
c/o JLL	700,000	B2/B8	Looking for data centre facility around Stansted plus 40 miles.
c/o C&W	400,000	B8	B8 requirement targeting early 2025 occupation.
c/o Gerald Eve	2,500,000	B8	Supply chain network for Sizewell C looking for space across East Anglia
Motorsense	100,000	B8	St Neots occupier looking for expansion space.
VRCO	100,000	B2/B8	Start-up developing electric, vertical take-off aircraft. Need direct access to an airfield for development and testing.
Flimax	100,000	B2/B8	Start-up developing electric aircraft. Need direct access to an airfield for development and testing.
STEF	150,000	B8	European 3pl specialising in the logistics and transport of food products. Looking on A14 corridor for distribution hub.
Bartrums	100,000	B8	Regional 3PL looking for expansion space
Bactons	100,000	B8	Regional 3PL looking for expansion space
DPD	60,000	B8	Parcel delivery company looking for low site cover site.
c/o Klipa	750,000	B2	Manufacturing client. Need 3MVA of power
M&S c/o LSH	750,000	B8	Looking for new SE distribution hub
Confidential European 3PL	2m	B8	Looking for sites in the Eastern Region.
AEGG	100,000	B2/B8	Manufacture and distribute glass packaging. Based in Suffolk and looking for expansion space.
Coca Cola	850,000	B2/B8	Looking for site close to A1 for new production facility
c/o BNP Paribas	1,000,000	B8	Looking for new facility centred on Peterborough

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OCCUPIER / AGENT	SIZE (SQ FT)	PLANNING USE	COMMENTS
c/o M1 Agency	100,000	B2/B8	Lincolnshire-based manufacturing & packaging business looking to expand into Cambridgeshire or Bedfordshire.
Yodel c/o Penn Commercial	100,000	B8	Cambridge + 10 miles. Will consider D&B opportunities.
Hermes	100,000	B8	Seeking new hub for parcel handling to service Peterborough and Cambridge
Leading UK garden products supplier	450,000	B2/B8	Looking for a site on the A14 for 3 years. No site large enough to accommodate their expansion plans.
MH Star	800,000	B8	Seeking site along the A14 for global fulfilment centre.
Total	**13.29m sq ft**		**Total listed demand for units > 100,000 sq ft within the regional market.**

Key conclusions from the local and regional market analysis are as follows:

- There is strong demand for land and premises which is at a level much higher than is currently being delivered by speculative development;
- Recent record take-up in the area has diminished supply to levels which cannot support the future expected economic and population growth;
- Whilst the limited supply of large units is insufficient in quantitative terms, in terms of quality, the second-hand supply does not meet the needs of modern occupiers;
- There are extremely limited opportunities along the A14 corridor for sites;
- There is a lack of high-quality employment land suitable for mid-range or large employment units;
- Occupiers are having to look further afield to different local authorities to find suitable accommodation. Recent examples include Hotel Chocolat (acquired a property in Northampton) and Westland Horticulture (acquired a property in Corby). Other occupiers will follow suit if suitable land and properties cannot be found for them locally.

Considering the context and characteristics of the site, there is an opportunity to provide deliverable land for employment uses and suitably accommodate properties for the burgeoning industrial, logistics, manufacturing and technology sectors.

The site is ideally suited to provide detached and self-contained facilities encompassing industrial and logistics functions, together with associated office and administration functions.

We trust this report covers the detail required, but if you would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

[redacted]

Walter Scott BSc (Hons) MSc MRICS
Partner, Logistics and Industrial

Signed for and on behalf of Bidwells LLP

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