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Greater Cambridge Shared Planning Service,

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Cambridge City Council,

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Dear Sir

Greater Cambridge Local Plan First Proposals

Tritax Symmetry is the logistics development arm of Tritax Big Box REIT plc, a FTSE 250 company. Tritax Big Box REIT plc is a real estate investment trust (REIT) dedicated to investing in and funding the pre-let development of very large logistics facilities in the UK. The business is dedicated to providing best-in-class greener logistics buildings, a collaborative and entrepreneurial approach, and providing an unrivalled choice of building locations and scale to its customers. Tritax Symmetry has a land portfolio comprising 4,150 acres, capable of accommodating over 40 million sq ft of B8 logistics space. Tritax Symmetry has a diverse speculative development programme with buildings up to 270,000 sq ft.

All new buildings are net zero carbon in construction, built to an institutional specification that includes roof mounted PV's, and can be fitted out to meet occupiers' individual requirements. Tritax Symmetry is a Gold Leaf Member of the UK Green Building Council (UKGBC) and is now delivering new developments that meet UKGBC's definition for net zero carbon in construction.

Tritax Symmetry is delivering net zero carbon in construction buildings on new developments. Whilst our focus to date has been on the elements within our control, the construction of our buildings, we have a strong aspiration to move towards net zero carbon in operational.

We have witnessed a remarkable acceleration in the use of on-line retailing and a significant increase storage and distribution from manufacturing business which have been part of the massive demand for logistics and warehouse buildings. This demand has been fuelled by the twin drivers of Covid 19 movement restrictions and uncertainty in the global supply chain of

goods and components, a factor of Brexit and Covid. Nationally this has led to a supply of less than 12 months in logistics floorspace. Lack of floorspace to meet the needs for storage and distribution will lead to strain on all sectors of the economy and public life. As a part of social infrastructure, logistics floorspace like retail floorspace, needs to respond to growth in population and real growth in demand. National Policy Statement for National Networks confirms that the logistics industry provides warehousing and distribution networks for UK manufacturers, importers and retailers

In respect of need for employment land the SoS found “**an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally**”. The lack of employment land was likely to result in valuable investment flowing into adjacent authorities to the detriment of local residents and existing businesses wishing to expand would continue to leave to find more suitable premises.

It was material the site is available now and can be delivered relatively quickly to address known commercial and policy needs.

The development would deliver a range of socio-economic benefits which carry significant weight in the Borough. Those benefits included;

- A construction expenditure of £72.7m, creating over a thousand construction jobs;
- The creation of 1,200-1,410 operational jobs with mechanisms in place to ensure these are available to local people.
- Business rates of circa £3m per annum;
- £50-60m GVA, and
- Support for local businesses.

In a number of recent Inquiries the SoS gave very substantial weight to the delivery of high-quality logistics floorspace. Commenting that the proposal would address “**the very specific locational requirements of the logistics sector and make provision for storage and distribution operations at an appropriate scale.**”

The SoS agreed the proposal would “**deliver a substantial range of tangible economic benefits including well paid jobs for local people**” and would boost the local economy.

The Secretary of State found;

- there is persuasive evidence that a substantial planning need exists for major logistics and associated industrial development of the kind proposed in this application.
- the broad evidence of need for the type of employment land represented by the application site is material to the consideration of this application.
- while approval of the present application would produce a numerical exceedance of the quantum of employment development allocated; such development plan provisions are not to be regarded as ceilings to development
- there is evidence of unfulfilled enquiries for development of the kind proposed
- the evident need for development of the type proposed carries substantial weight in the planning balance.
- the proposed development would contribute substantially to the national policy imperative, to promote and support a strong competitive economy, as particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations.

- the development would contribute substantially to the supply of employment land evidently necessary to the economic recovery and well-being of the area.
- the development would directly and indirectly generate several thousand jobs and other economic benefits in the area, encouraging business commitment and creating opportunities for enhancement of skills among the workforce.
- agrees that that the economic benefits carry very substantial weight in the planning balance.
- the evident need for development of the type proposed carries substantial weight, and the economic benefits of the proposal carry very substantial weight in favour of the scheme.

The Inspectors found

- Information from the British Property Foundation (BPF) confirms a widely held view that rapid growth being experienced in the logistics sector of the UK has been due to structural changes to high street retailing and a commensurate growth in e-commerce. This shift has been accelerated by the ongoing Covid19 pandemic restrictions on personal movement.
- The warehousing and logistics sector has proved resilient in the current pandemic. It is therefore to be expected that this sector will be instrumental in the post-pandemic recovery of the wider UK economy.

Significantly, National Policy Statement for National Networks states;

The logistics industry, which directly employs over two million people across more than 190,000 companies generating over £90 billion annually, underpins the efficient operation of most sectors of the wider national economy.⁴

In respect of the issue of How Much development and Where the Greater Cambridge Local Plan proposes to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live. Whilst logistics uses are to an extent constrained by external factor, they must be located with good connectivity to the Strategic Road network, on large, relatively flat sites, they do seek to locate in the most sustainable locations appropriate to their use. The NPPF recognises that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

With respect to warehouse and distribution space, the Employment Land Review reports an under supply of around 20,000 m² and suggests suitable locations should be identified for small and mid-sized light industrial and distribution units. The analysis also identified an undersupply in industrial floorspace requirements, and the consultants suggest that some provision should be made for allocations that support this use class, both in order to facilitate traditional industries as well as supporting advanced industries that require operational activities not suited to residential areas. It states that future re-provision should be of at least 25,000 m², however, planning for a greater recommended rate of up to 50,000 m² would align with the recent completions trends and better offset losses in both the Cambridge and South Cambridgeshire



The ELR says that for Industrial (B2) and Warehousing and distribution (B8); suitable locations should be identified for small and mid-sized light industrial, general industrial and distribution units. Light industrial premises are required with anticipated losses in the city requiring re-provision in South Cambridgeshire. Some provision should be made for allocations that support general industrial floorspace in order to facilitate traditional industries as well as supporting advanced industries that require operational activities not suited to residential areas.

Failure to address the logistics floorspace needs of Greater Cambridge will lead to increased vehicle miles as businesses and households are supplied from facilities further away. There will also be greater stress on businesses seeking to fulfil orders from greater distances. Logistics buildings are part of the local manufacturing supply chain and form important synergies with local businesses or customers.

Employment policy is considering supporting classes E(g), B2 and B8 in locations (In Cambridge Within towns and villages, Close to but outside settlement boundaries of villages, In defined 'established employment areas in the countryside' and In the countryside for the expansion of existing businesses). Which are not appropriate for either general industrial uses or for logistics development. The plan is looking to impose a blanket prohibition on large scale national and regional warehousing and distribution centres in Greater Cambridge.

A Distribution Centre is a warehouse that distributes goods outside of a company's internal supply chain or to its retail estate. However, the 'National' prefix implies that it also transfers goods to Regional Distribution Centres (RDC). The 'Regional' prefix usually implies that the RDC is part of a warehouse network and it is supplied from a National Distribution Centre (see NDC) in order to better service a local region. Local companies with national or international customers would require a NDC or RDC. Similarly, companies supply the Greater Cambridge region would require a local RDC.

While the plan is seeking to provide a range of new employment space this will not, together with the existing allocations, provide a good range in the type, size and location of sites that respond to the needs of businesses. A range of employment sites must be able to cater for the needs of the logistics sector and provide sites of at least 10ha close to the SRN. A single warehouse of 25,000 sqm (which is below the current market average) requires a site of around 10ha.

Greater Cambridge will need to consider whether regional distribution centres are being provided in sustainable locations in adjoining authority areas to meet any regional need before unilaterally abdicating responsibility to meet regional needs.

The Plan needs to reflect the current and future needs of the logistic industry as that need is now manifesting itself, post Covid and post Brexit. Large sustainable sites close to the SRN need to be identified in a planned way.

We would hope that as the Plan is developed in more detail the needs of the logistics sector are given greater consideration. We would be happy to meet with you and show you one of our Net Zero Carbon sites.

Yours sincerely

Tim Partridge

Planning Director

For and on behalf of Tritax Symmetry

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