

For the attention of Greater Cambridge Planning (Policy) Team

Greater Cambridge Joint Planning Service  
Cambourne Business Park  
Cambourne  
CB23 6EA

By Email: [localplan@greatercambridgeplanning.org](mailto:localplan@greatercambridgeplanning.org)

17<sup>th</sup> October 2025

Dear Sir/Madam

**Draft Planning Obligations Supplementary Planning Document (SPD)  
Representations on behalf of Newlands Developments**

Newlands Developments welcomes the opportunity to make comments on the Autumn 2025 draft Greater Cambridge Planning Obligations SPD. Newlands is making this representation pursuant to their interest in land at Brickyard Farm, Boxworth (currently known as 'Boxworth Gateway') which has been promoted through the Call for Sites and Regulation 18 Greater Cambridge Local Plan (GCLP) consultation process (including the latest call for sites in March 2025) feeding into the emerging GCLP.

The land is subject to Call for Sites/HELAA Reference 47353, and Newlands are promoting it through the Local Plan to enable delivery of a highly sustainable Logistics development of up to 150,000 sq m. That would help address an acute shortfall of supply, and deliver on significant demand for logistics space in Greater Cambridge, as identified by Iceni's 'Greater Cambridge Warehouse & Industrial Space Needs' (March 2025).

**Planning Obligations context (Chapter 1)**

SPDs should not introduce new planning policies. The National Planning Practice Guide (PPG) references what the role of supplementary planning documents is intended to be, stating:

*Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.*

\*Planning Practice Guidance - Paragraph: 008 Reference ID: 61-008-20190315

Indeed Para 1.6 of the draft SPD recognises that “The SPD does not introduce new planning policy but seeks to give effect to existing development plan policies”, i.e. the Cambridge City Local Plan 2018 and the South Cambridgeshire Local Plan 2018.

We comment below on Affordable Workspace where the draft SPD appears to encourage new or greater obligations than either national law/national planning policy or adopted local planning policy allow or require. In other words, the Affordable Workspace (10%) obligation is not supplementary to existing adopted local plan policy, nor consistent with national policy or Law.

Further, at present a Community Infrastructure Levy (CIL) does not apply to the Greater Cambridge Authorities. Thus, planning obligations will typically be secured through a s106 Agreement, made under Section 106 of the Town and Country Planning Act 1990. Regulation 122 of the Community Infrastructure Levy Regulations 2010 (“the CIL Regulations”) (as amended) sets out that it is unlawful for a planning obligation to be taken, if the obligation does not meet all of the following tests:

- a. necessary to make the development acceptable in planning terms;
- b. directly related to the development; and
- c. fairly and reasonably related in scale and kind to the development.

In this context, the draft SPD sets out 20 potential areas (Chapters 4 to 23) where planning obligations may be sought. This could place significant additional costs on development, and it is important to ensure the Reg 122 tests are appropriately applied by the planning authority.

## Affordable workspace (Chapter 20)

At Para 20.9 the draft SPD states. ... “*New major commercial developments, including mixed use schemes, are encouraged to make provision for affordable employment space. The provision of an element of affordable employment space will be most suited to large commercial schemes, e.g. proposals over 10,000m<sup>2</sup>, in use classes E(g), B2 and B8, with 10% as the suggested amount of floorspace to be given over to affordable use*”.

The adopted Cambridge and South Cambridgeshire Local Plans do not include policies requiring affordable workspace provision. As such, there are no adopted plan policies for affordable workspace to be supplementary to. It is insufficient to simply state that “The potential for a requirement is being explored through the emerging Greater Cambridge Local Plan”. Such

an aspiration may or may not come forward in the Local Plan, and given it is currently at Regulation 18, the Joint Local Plan should be afforded very little weight.

This reference creates confusion. The SPD as a whole (if adopted) should be considered a material consideration for decision making, rather than parts of it. A consistent approach to that taken in the London Plan should apply, where it specifically states that affordable workspace policies should only be defined in Development Plans and Section 106 Agreements – i.e. not in SPDs.

Furthermore, the SPD applies the affordable workspace approach to all employment uses over 10,000 sq m. It isn't clear from any evidence which specific business sectors are considered to justify a need for it. Further, Greater Cambridge is a large area, covering two authorities. The market conditions in the City Centre will be very different to city edges, villages and peripheral parts of South Cambridgeshire, so any policy for affordable workspace should be informed by specific market evidence in different locations and only be applied where there is a clear policy objective, and need for their introduction. In our view, this doesn't work as a 'one size fits all'.

Should there be, for example, a requirement for affordable space in a specific area of R&D, it doesn't follow that the same requirement applies to logistics. Where the issue is less acute (geographically or sector-specific) and intervention is not required, the policy should not apply, as it could threaten the viability of development of certain types, and in certain locations.

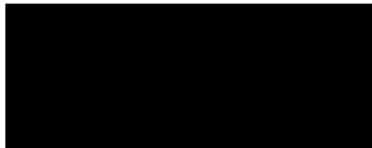
Without further assessment of the types of business that might be defined as in need of 'affordable workspace' it is not possible to determine where they may locate. If demand/take-up did not exist, provision of such space would further erode industrial capacity in an area where the Council's own evidence base has identified significant constraints on supply. This provision of smaller affordable units can fetter the ability for large logistics sites to function more efficiently, particularly given the requirements for large format commercial units, sufficient yard space and depth, HGV and car parking provision, SuDs, strategic landscaping and BNG areas. This requirement would place an additional strain on viability.

Accounting for land and Construction costs, viability differs in certain locations. A blanket obligation to all employment uses in all locations could ultimately undermine delivery of commercial space, for which Greater Cambridge has identified considerable need, given such space would also need to be managed by the landlord. This adds an additional financial burden.

All of the above, flags why extensive work is required to inform an evidence base and justify such an interventionist policy within defined geographical areas. It is considered confusing and unsound to apply any reference to affordable workspace within the SPD. Pursuant to the PPG, there is no policy for this to be supplemental to, and only through independent examination and locational scrutiny, which in the absence of a Spatial Strategy, can only be done through a DPD.

We trust the above will be given due consideration.

Yours faithfully,



Lyndon Gill  
**Senior Director**