



GREATER CAMBRIDGE LOCAL PLAN- THE FIRST PROPOSALS

S/RRA/SAS Land to the south of the A14 Services, CB23 4WU

Site Reference: OS250

Representations on behalf of

Client :

Reference:

Date: 13.12.21

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1. Introduction

- 1.1. Cheffins Planning have been instructed by [REDACTED] land promoter and developer, and [REDACTED] landowner to promote their land interests at land to the south of the A14 Services, CB23 4WU. My clients welcome the proposal to allocate a 18.62 hectare site, including his land interests, for commercial/non-residential development. It is recognised that the proposed allocation also includes land which is owned by [REDACTED] and my client is actively working with [REDACTED] to deliver the entire allocation. As a consequence of the cooperation and joint working with [REDACTED] it can be confirmed that the entire allocation is both available and deliverable.
- 1.2. Research undertaken by Cheffins Commercial has confirmed that as the Cambridge Regional Economy has grown over the last ten years so has the demand for industrial and warehousing. This demand comes from both local businesses which are growing or relocating as well as from national/international operators who recognise opportunities to serve the region. This demand for industrial and warehousing is emphasised by virtue of a commercial promoter/developer [REDACTED] already having been engaged by the landowner to assist in promoting and ultimately delivering this site. [REDACTED] has built a strong reputation for promoting land through the planning system for residential and employment use and for the development of high-quality warehousing, logistics and Business Parks. Both the promoter/developer are already aware of commercial occupier interest in the site, by virtue of its draft allocation.
- 1.3. As outlined below there are no significant constraints to the delivery of this site and where concerns have been raised in the Site Assessment these are considered in more detail. A suite of documents has also been prepared to accompany this submission and support the comments made.

2. Existing Site Conditions

- 2.1. The site is located to the south of the existing A14 Cambridge Services, with vehicular access provided from Boxworth Road, which in turn links to the A14 junction. This junction provides access to the A14 in both directions and was upgraded as part of the recent A14 improvement works. The northern part of the site represents previously developed land as a consequence of this part of the site being used as a contractors compound associated with the A14 improvement works. The southern part of the site is greenfield, which has a gentle incline to the south west.
- 2.2. The northern half of the site currently has the characteristics of a brownfield site, Highways England are under a legal obligation to restore this part of the site, which was until recently used as a highways depot, back to its former use. The restoration works will include the removal of the hardstanding and associated installations across the site, leaving the land ready for future development, as envisaged by the draft allocation. The restoration of the land does not take-away the fact that the site is a suitable location for employment development, being adjacent to Cambridge Services and the A14 junction.
- 2.3. [REDACTED] land whilst greenfield in nature, following the provision of the strategic landscaping buffer required by the draft policy, the two landholdings will appear as one. The significant and mature landscaping, as detailed on the plan attached at Figure 1, will also help soften the impact of the development in views from the surrounding countryside.

3. Master Planning Approach

- 3.1. An illustrative masterplan has been produced (see Figure 1 below) which details (in indicative form) the proposed access into the site, landscaping, potential routes through the site, potential development parcels and possible pedestrian link to the amenities/facilities at Cambridge Services.
- 3.2. As illustrated the site has the potential to deliver a diverse range of commercial buildings. The benefits of the proposed development are wide ranging and will promote the social,

economic and environmental objectives of the National Planning Policy Framework. The site is situated in a sustainable location adjacent to existing services and facilities with good access to the local and national road network. The development of this site for employment purposes will also help to promote the continued economic growth in the region.

- 3.3. A good proportion of the site will comprise planting, biodiversity enhancement and landscaping, which will enhance and strengthen the existing ecological features on the site (e.g. existing trees and hedgerows on the field boundaries). The development will provide a logical extension to the built form of the existing services of appropriate scale and character, as well as significant bio-diversity benefits.

Figure 1: Illustrative Masterplan



4. Technical Assessment

- 4.1. As detailed below some initial site and technical assessments have been carried out in relation to master planning, landscaping and access. This work has indicated that some of the scoring in the HELAA should be updated/refined, adding weight to the justification to allocate this site for development.
- 4.2. According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. It is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be addressed through further detailed technical work or master planning. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the matter is unlikely to constrain development, then a green rating would be more appropriate.

5. Suitability for Development

Adopted Development Plan Policies

- 5.1. Being outside the current settlement boundary for Boxworth as defined in the South Cambridgeshire Adopted Policies Map, the site is assessed as being amber. However, the boundaries are due to be reviewed as part of the plan-making process for the GCLP, "with boundaries defined to take into account the present extent of the built-up area as well as planned new development" It is unclear if these planned boundary changes have been considered in the HELAA assessment. The settlement boundary of Boxworth may need to be reviewed to accommodate this development; and the proposal to allocate this site has accepted that this will occur. There are questions as to whether this scoring should be altered.

Flood Risk

- 5.2. It is noted that the issue of flooding has also been awarded an amber score with a small element of the site being in Flood Zones 2 and 3. There is also limited potential for surface water flooding. As part of the detailed development proposals for this site a Flood Risk Assessment and Sustainable urban Drainage Strategy will need to be formulated. The Flood Risk Assessment will review flooding from all sources, noting that this site lies within the upper 5km² of the catchment, the method used to provide the surface water flood mapping and fluvial flood mapping may be overestimating the scale and impact from these food sources. The site will be served by a drainage system that responds to the four pillars of Suds and will improve ecology, bio-diversity, water quantity, water quality and amenity. Therefore, subject to suitable wording regarding the need to provide an appropriate flood risk and Sustainable Urban drainage strategy a green score should be attributed to this element of the site assessment.

Landscape and Townscape

- 5.3. These representations have been accompanied by a Landscape and Visual Impact Assessment (see Appendix A). The findings of this landscape and visual appraisal are summarised below:

- *"The scheme will principally exert a localised area of influence in terms of landscape and visual effects, seen in context with the existing Cambridge Services and Buckingway Business Park sites from a limited number of locations within 0.5 - 1km of the proposal site.*
- *The proposal will not have significant landscape or visual effects upon any statutory designations.*
- *The site land use will change from that of brownfield and arable land to a commercial and industrial development, however the proposed development would not cause any loss to the defining characteristics of the local character or result in any substantial additional feature over and above those which already exist and no key landscape characteristics would be harmed by the proposal. The proposal is judged to have a moderate to low adverse visual effect on receptors in the medium to long term.*
- *Over time, the 25m landscape buffer around the Site perimeter will increasingly filter and screen views of the development as the buffer establishes and matures. This will ultimately replace the existing landscape buffer surrounding the Cambridge Services site, forming a new field boundary in keeping with local landscape character".*

- 5.4. From the above is evident that the development of this site will have no significant effect upon any of the landscape or visual receptors that the proposed development is likely to have an influence over.

- 5.5. The report also advises that "The proposed development, experienced in the context of the existing Cambridge Services site and Buckingway Business Park is consistent with the local

landscape setting and would not cause any loss to the defining characteristics of the LCA or result in any substantial additional feature over and above those which already exist”.

- 5.6. It is also stated that *"The proposed development would also not constitute an uncharacteristic element within views available at a local level and will, on balance, have limited effect on the overall scene in the medium to long term. Any change would be seen in the context of similar development and will be filtered and screened over time as the 25m landscape buffer matures. Consequently, it is judged the development proposal would be a slightly detrimental alteration that would not significantly change baseline views in the long term.*

In conclusion, it is considered that the Application Site is a suitable location to accommodate the proposed development”.

- 5.7. In addition, care will be taken to vary the scale of the building and the use of different coloured materials for the external cladding will also help reduce their visual impact. This site will also appear as a logical continuation of the existing services with this facility representing the foreground of the site when viewed from the north/A14.
- 5.8. The above comments clearly support the findings of the Council's assessment that the development of this site will not have an adverse impact on landscape character.

Biodiversity and Geodiversity

- 5.9. From an initial desk top assessment the site would not appear to be likely to have an adverse impact on habitats of principal or high ecological value. The proposal to reinforce the existing landscaping and provide 25m landscape buffers as well as on site landscaping / biodiversity enhancements will unquestionably improve the ecological value of the site.
- 5.10. The site has been subject to an arboricultural assessment which has indicated that the majority of the trees on the site can be retained and adequately protected. A copy of this assessment is attached as Appendix B)
- 5.11. An application for the development of the site will need to be accompanied by a Phase 1 Ecological Survey which will not only assess the ecological impacts of the proposal but recommend measures to improve the ecological value of the site. This is likely to include the creation of attractive attenuation features as part of site-wide drainage system for their ecological value and the onsite planting and landscape buffers will also be managed to provide varied habitats. The bio-diversity enhancements will also provide the 20% bio-diversity net gain set out in the draft Local Plan policy. As a consequence of the information provided to support these representations it is evident that the biodiversity and geodiversity value of the will be enhanced.

Open Space/Green Infrastructure

- 5.12. The comments made regarding open space are noted and as detailed, the site will provide open space, with green infrastructure being provided in the landscape buffers bordering the site. The scheme will also seek to provide sensitive landscaping within the site.

Historic Environment

- 5.13. The comments made in relation to this site are noted with the site being physically separated from the designated or non-designated heritage assets in Boxworth to the south of the site. This is confirmed within the Archaeological desk-based heritage assessment (see Appendix C) which states *"There is one Grade II* and one Grade II Listed Building within 1km of the site within the village of Boxworth. The development proposals will have no impact on these Listed Buildings, their settings, the significance of those settings or the ability to appreciate them".*

Archaeology

- 5.14. The site has been subject to an **Archaeological desk-based heritage assessment (Appendix C) which has advised that "A realistic assessment of the buried archaeological**

potential of the site can be made, owing to the large volume of archaeological work that has been undertaken within the site and across the adjacent landscape in the course of the construction of the new A14. Archaeological remains of all periods from the Neolithic onwards are known from within 1km of the site.

- 5.15. The assessment has identified that there is a low potential for archaeological remains of Palaeolithic, Mesolithic, Neolithic, Bronze Age, Roman, Saxon and modern date; moderate potential for remains of Iron Age and medieval date and a high potential for remains of post-medieval date to survive on the site. If present at the site, remains of all periods are expected to be of low significance.
- 5.16. Cartographic evidence suggests that the majority of the field boundaries were established before 1650 and that the site remained as open ground as either pasture or cultivated land until the construction of the construction compound.
- 5.17. The western part of the site has been subject to a geophysical survey and trial trench evaluation which revealed traces of post-medieval furrows but no further archaeological evidence has survived in this area. A significant portion of the site has been truncated by the former compound but the extent to which this area of the site has been disturbed is unclear. Archaeological remains may survive within the central and eastern parts of the site".
- 5.18. The assessment has concluded that the remains are expected to be of low significance. However, appropriate assessments will be undertaken prior to the development of the site, including intrusive investigations if required. The above confirms the Councils assessment of this site as Green.

Accessibility of Services

- 5.19. There are questions as to the benefits of the scoring system in relation to a commercial site and the relevance of the distance of the site from any educational facilities is questioned. Whereas the distance from employment opportunities should be emphasised as a significant benefit. The Transport Study at 2.14 advises that *"As set out previously, the site is within walking or cycling distance to several local facilities and amenities, which may be required by workers on a day-to-day basis. The services available locally are considered suitable for an employment site, focusing on sustenance and accommodation"*.

The Highway Impacts, Site Access and Transport and Roads

- 5.20. Whilst it is recognised that an application for the development of this site will require a Transport Assessment, this draft allocation has been subject to a Transport Study.
- 5.21. This Transport Study has advised that "South Cambridgeshire District Council has been working with Cambridge City Council to develop the Greater Cambridge Local Plan with a 'Call for Sites' exercise being undertaken in Spring 2019. This resulted in the site being included within the draft allocation and considered suitable for 70,000sqm of commercial space. The study advises that from a transport point of view, it is considered that the identified land at Boxworth Road is appropriate for commercial development, which will be supported by access proposals and measures identified within this Transport Study. The development scheme will need to be designed to ensure that there is adequate space for the parking and manoeuvring of all forms of vehicles.
- 5.22. The possible access proposals and other measures identified as part of this Transport Study which will need to be included the Transport Assessment include:
 - Potential to support local bus services. This will be discussed further with the local bus operator and Cambridgeshire County Council;
 - A Travel Plan will be implemented as part of the proposed development. The key aim of the Travel Plan will be to encourage modal shift away from single occupancy car use to other forms of mobility including cycling, use of public transport and car sharing

- The site is within walking and cycling distance of several local facilities and services and additional connections will be explored further. The site promoters are already in discussions with Cambridge Services to explore the creation of a pedestrian route between the proposed development site and Cambridge Services.
- 5.23. It is recognised that the Transport Strategy will need to evolve throughout the planning process and will be developed through discussions with the local authorities, public transport operators, the local community and other stakeholders.
- 5.24. The Transport Study advises that *"While the site is located in an area that has an amber rating for impact on the strategic highway network (limited opportunity for growth), the recent upgrades and enhancements to the A14 have provided additional capacity to be able to accommodate existing and future travel demand along this corridor. Furthermore, the sites former use as a Highways England appenddepot and the fact that the resultant increases in traffic flows on the strategic network equate to less than 3%, it is concluded that impact on the local and strategic highway networks will be minimal. And as such, this moves the site towards a 'green' rather than 'amber' rating"*.
- 5.25. It is concluded that the Transport Study has demonstrated that the highway impacts of the site can be addressed and that an access can be achieved which is capable of serving the entirety of the allocation, regardless of the ultimate mix of uses proposed.
- 5.26. In view of the above it is contended the scoring system for the above issues should be amended to green.

Noise, Vibration, Odour and Light Pollution

- 5.27. The draft allocation site has been subject to a noise assessment (see Appendix D) which was carried out in accordance with relevant local and national planning guidance. This survey has advised that the noise levels at the site are dictated by road traffic noise emissions from the A14.
- 5.28. The noise affecting the development has been assessed in accordance with BS8233. The site is considered to be acceptable for commercial development subject to the adoption of a glazing and ventilation strategy which will need to be investigated and refined further as more details of the development design become available.
- 5.29. The noise assessment has concluded that the site is suitable for the proposed development in terms of noise levels.
- 5.30. Similarly the issues of vibration, odour and light pollution will need to be considered in the design of the development and it is contended that these matters should not be seen as an impediment to development and should be scored green.

Stakeholder Engagement

- 5.31. [REDACTED] has already had initial meetings with both Lolworth and Boxworth Parish Councils to discuss the draft allocation and understand their concerns and issues. These discussions have been generally positive and the site promoters will continue to engage with stakeholders including these Parish Councils (together with Swavesey Parish Council whom they are due to meet on 13th December) as they refine their development proposals.

Demand for employment sites in the Greater Cambridge Combined Authority Area

- 5.32. Cheffins Commercial have provided details as to the market for industrial and warehouse buildings in the Greater Cambridge Combined Authority area in response to the recent draft allocation of employment sites in the emerging Local Plan. Cheffins is actively involved in the industrial and business space sectors and produce market reports and analysis based on its own, and shared, primary data.

- 5.33. In detailing the demands for such buildings they have used the former planning nomenclature of B1c, B2 and B8 (light industrial, general industrial and storage and distribution uses).
- 5.34. It is advised that "As the Cambridge regional economy has grown over the last ten years so has the demand for industrial and warehousing property. This demand comes from both local businesses which are growing or relocating as well as from national/international operators who recognize market opportunities in the region.
- 5.35. Cambridge has not developed as a large-scale logistics location but it does attract demand from warehousing and logistics operators wishing to service local, sub-regional and regional markets. Historically, the largest unit sizes for this type of "local" operation would be between 50,000-100,000 sq ft but more recently, with the massive growth of internet retailing we have seen "last mile" delivery businesses seeking unit sizes in excess of 100,000 sq ft to service regional/sub-regional markets. Our agency is currently involved in an active requirement for a last mile deliverer requiring a purpose-built building of 115,000 sq ft in the South Cambs district and we are aware of another similar company seeking 90,000 sq ft within the region.
- 5.36. Demand from existing, locally-based businesses comes in many forms, including from manufacturing, local distribution and service providers, but the special feature of the Cambridge market is the preponderance of companies involved in the various technology sectors which have taken up industrial space in the market, especially new build space. Examples of such demand can be found at the Cambridge Research Park Enterprise development where all nine units were taken by "tech" companies. Cambridge medical robotics company CMR has recently announced it is having a new 75,000 sq ft production facility constructed outside of the district at Ely, and at the at Bourn Quarter (currently under construction) Cambridge Design Partnership have already committed to buildings of around 80,000 sq ft prior to completion of the development.
- 5.37. Our research shows that in the area within around a ten mile radius of Cambridge (broadly equivalent to the Combined Authority area) the availability of industrial/warehouse space at 1st December 2021 is at a record low level of 185,000 sq ft. Availability has been reducing year on year over the last five years from c 400,000 sq ft in 2016. Typically, take up of industrial/warehouse space over the last ten years has been at around 300,000 – 400,000 sq ft per year.
- 5.38. Total industrial demand measured by applicant and agent enquiries is difficult to analyse with any accuracy because many enquiries are speculative and some cover wider geographical areas than just the subject area. An applicant may be happy to locate in a number of different locations. That said, Cheffins applicant database registered over 420 requirements seeking industrial and warehousing space (potentially) in the subject area during the last two years (2020- 2021) totaling over 8.5 million sq ft broken down as follows:

<i>Size sq ft</i>	<i>No. of enquiries</i>	<i>Total sq ft (approx.)</i>
<i>Under 10,000</i>	<i>207</i>	<i>950,000</i>
<i>10,000 – 50,000</i>	<i>81</i>	<i>1,700,000</i>
<i>Over 50,000</i>	<i>45</i>	<i>5,850,000</i>

- 5.39. By comparison, Bidwells latest market report (Autumn 2021) suggests active industrial and warehousing demand in the subject area as at June 2021 at a little under 2 million sq ft, up from 1.3million sq ft at the end of the previous half year.
- 5.40. In 2021 to date industrial/warehouse take up has been only 180,000 sq ft. The data above would suggest that this limited take up of space is a factor of the paucity of supply in the market rather than a lack of demand. Much of the take up we have seen has been for new stock and there is currently less than 10,000 sq ft of new build stock available in the market (all of which is at one development in Sawston).

- 5.41. Two new developments will come on stream during 2021 at Bourn and Bar Hill, which will bring around 280,000 sq ft of new space into the market, but given levels of latent demand that is likely to be taken up within a year. 80,000 sq ft at Bourn is already pre-let.
- 5.42. Based on the analysis of demand we would consider that the true potential level of annual take up for the subject area, would be between 500,000 – 1 million sq ft per year. Allowing for say 50% of the take up to be in the “churn” of existing buildings this would mean that the development of around 12.5 – 25 acres per year of employment land (based on “rule of thumb” 20,000 sq ft of built area per acre) would be required to satisfy the demand.
- 5.43. Our analysis of enquiries shows that the majority of demand is for smaller unit sizes (under 10,000 sq ft), but there are a significant number of enquiries for larger unit sizes. Many of the larger requirements are searching across a wider geography than the subject area but there are a significant number of existing, locally-based companies as well as incoming businesses who are specifically seeking a Cambridge location and whose requirements are in excess of 50,000 sq ft. A small number of these require buildings in the order of 100,000 – 250,000 sq ft.
- 5.44. We consider that sites suitable for regional, sub-regional and local demand should be able to accommodate single unit sizes of up to 150,000 sq ft.
- 5.45. The above demonstrates that there is a very strong market demand for commercial development and there are questions as to whether this allocated site could be expanded to help meet this demand. This could be achieved by having a proportion of the 25m buffer to the south being outside the boundary of the allocated land (see Figure 2 below), which is on land within the control of the site promoters. This will allow more efficient use of the allocated land.

Figure 2: Development site moving 25m buffer to the south



- 5.46. Similarly, the proposed site allocation could be extended to the east of the A14 services on land already owned by [REDACTED] as shown on Figure 3 below. This eastern land parcel has very well defined boundaries and there is sufficient room either on or immediately adjoining the site to address any flooding issues associated with the development of the site. This wouldn't have any impact on existing heritage assets.

Figure 3; Development site including additional land located to the east



Understanding of regional/local distribution

- 5.47. It is noted that the draft policy for this site and the main text of the local plan contains very little information as to the definition of local and regional distribution. It is considered that local distribution needs to be defined and greater explanation provided as to the size of units that the Council would anticipate being provided. In reviewing the consultation version of the Greater Cambridge Plan, both the main document and supporting documents only provide limited information about local versus national distribution. The Local Plan states that "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 that the plan continues to not support large scale regional and national distribution proposals". As detailed above Cheffins Commercial consider that sites suitable for regional, sub-regional and local demand should be able to accommodate single unit sizes of up to 150,000 sq ft.
- 5.48. The A14 services site is not in the Green Belt and my clients are trying to understand the size of B8 units which the Council would accept on this site and how the Council will be looking to define and control local distribution as opposed to national distributors? Furthermore, it is contended that additional wording needs to be provided within the policy allocating this site to address this issue and provide guidance.

6. Conclusion

- 6.1. As detailed above the joint landowners for this draft allocation are working together and this site is clearly available and deliverable. The proposed landscaping, as detailed in the LVIA, will ensure that the proposed development of the site will not have an adverse impact on the landscape, especially once the 25m landscaping buffers reach maturity.
- 6.2. The Transport Study has confirmed that the site can be readily accessed from Boxworth Road and the A14 junction has capacity to deal with the traffic flows associated with the site.
- 6.3. Whilst some question have been raised as to scoring applied by the Council in their site assessment, there are not considered to be any constraints which cannot be addressed by suitable mitigation or technical reports.
- 6.4. There is also a significant demand for commercial development within the Greater Cambridge Authority area and this site will clearly help to meet this demand. There is also the potential for further land to be made available if required.
- 6.5. The draft allocation of this site is therefore supported and the landowners and promoters look forward to working with the Council to deliver this site.

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