

Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

By Email only to: localplan@greatercambridgeplanning.org

Date: 7 September 2021

Our ref: 63559/01/SB/JHy/20134743v4

Your ref:

Dear Sir/Madam

Joint Local Planning Advisory Group Meeting, 8th September 2021: Greater Cambridge Local Plan: Preferred Options (Regulation 18)- For consultation

We write on behalf of our client, Lolworth Developments Limited ('LDL'), regarding the Greater Cambridge Local Plan: First Proposals (Preferred Options) (Regulation 18) ('GCLPPO') which is due to be considered at your 8 September 2021 Joint Local Planning Advisory Group ('JLPAG') meeting, with a recommendation for agreement that public consultation takes place between 1 November and 13 December 2021.

LDL Position

As you know, LDL, a subsidiary of Salhia Real Estate, is promoting **Land at Slate Hall Farm**, near Bar Hill, on the north side of the new Junction 25 of the A14 (see Call for Sites Form ID: 40248), for a leading edge **employment park** development with business and logistics capability and capacity, in response to the employment need and demand, the site's excellent strategic accessibility and suitable location outside of the Green Belt and close to the major residential development areas of Northstowe and Waterbeach. The site is not though proposed to be allocated for such development in your GCLPPO.

Lichfields was appointed to provide planning advice to LDL and to take on the promotion of the site for an employment allocation in the GCLPPO, in July 2021. Our initial perusal of the draft Plan and its Evidence base so far points to the lack of proportionate evidence to support the need for a major employment park for Greater Cambridge over the plan period 2020-2041 has been assessed adequately. On this basis, some emerging policies are not justified robustly, nor positively prepared or in accordance with the requirements of the NPPF, particularly on the need **for regional and national distributors**.

Purpose

The purpose of this letter is to make you, fellow GCLPPO Planning Officers and Councillors on the JLPAG aware of the **LDL position**, before deciding on the content of the GCLPPO for consultation, in the context of our ongoing work assessing the **employment land need** and the team's ongoing work on the **site's suitability** for employment development (notwithstanding the finding to the contrary in your HELAA) which we will share with you when complete, as part of your consultation process.

It is also to highlight that our initial perusal of the Plan and its Evidence base highlights **three major shortcomings** to the approach to employment land:

- 1 Non-compliance with NPPF:** The Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020)¹ Table 41, identifies a shortfall of 24,471sqm B8 floorspace, leading to the GCLPPO identifying 3x site allocations that could help contribute towards this B8 need, totalling 20.0ha², albeit not fully meet it. That assessment and the approach of proposed draft Policy J/NE does address the NPPF para 83 consideration of “*storage and distribution operations at a variety of scales and in suitably accessible locations*” (save for in the context of J/AW on affordable workspace provision). Your proposed policy approach in the GCLPPO is that “*large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge*” (Topic Paper, pg. 13). Proposed draft GCLPPO employment policy J/NE does not comply with the NPPF in this respect and is, in effect, a continuation of the approach contained in the SCLP (2018) Policy E/11.
- 2 Alternatives not considered:** Under the alternatives considered to Policy J/NE (set out in the SA Part 2, pgs. 321-322), the only alternative considered is “*no policy*”. Therefore, the Councils’ have no evidential basis upon which to demonstrate that the policy choice of not providing for larger scale employment uses (logistics, in particular) has been appraised against alternative of doing so.
- 3 Not fully considering consultation feedback to ‘First Conversation’:** Appendix 1 ‘First Conversation’ indicates a range of consultation feedback on logistics, but the Councils’ response focuses on the local distribution needs ignoring the suggestions about the overall need for distribution space.

The GCLP should, therefore, assess the need and plan for storage and distribution operations at a variety of scales (including at regional and national levels) and in suitably accessible locations. This is also necessary to align with the requirements of the Oxford-Cambridge Arc Spatial Framework Consultation (para 3.4).

Concluding Remarks

We appreciate that you may not yet have been provided with evidence to support the strong demand on which to justify the need for a significantly greater employment development, including allocation of the highly suitable LDL site, nor to assess against our identified ‘headline’ shortcomings above. However, we consider it appropriate to **alert you to our intended representation** on these matters, following Lichfields appointment by LDL, at this stage, ahead of the JLPAG consideration of this aspect of the proposed draft GCLPPO.

We would be pleased to discuss the points raised above and would welcome **engagement** with Greater Cambridge Planning Officers and Councillors ahead of submitting a formal representation on the GCLPPO. Please contact me or my colleague, Josh Hymer, in that regard.

Yours sincerely


Steven Butterworth
Senior Director

Copy by email only to:
JLPAG Councillors – all 9 CCC and SCDC Councillors
Stephen Kelly, Joint Director of Planning and Economic Development

¹ Table 41 Demand Supply by Summarised Use Class, Greater Cambridge (sqm) 2020-2041

² S/RRA/SAS Land to the south of the A14 Services (17.3ha), S/RRA/BBP Land at Buckingham Business Park, Swavesey (2.1ha) and S/RRA/OHD Old Highways Depot, Twenty Pence Lane, Cottenham (0.6ha)