

Greater Cambridge Shared Planning
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By email only to: localplan@greatercambridgeplanning.org

Date: 13 December 2021

Our ref: 63559/01/SB/CGJ/JHy/20459936v5

Your ref:

Dear Sir/Madam

Greater Cambridge Local Plan: Preferred Options (Regulation 18)- Representation on behalf of Lolworth Developments Limited

We write on behalf of our client, Lolworth Developments Limited ('LDL'), to make a representation to the Greater Cambridge Local Plan: First Proposals (Preferred Options) (Regulation 18) ('GCLPPO') which runs until 13 December 2021.

We write further to our letter of 7 September 2021 ahead of the Joint Local Planning Advisory Group ('JLPAG') meeting held on 8 September 2021, and our 'Review of Logistics in Greater Cambridge Briefing Note' shared with the Council via email on 26 November 2021.

Lolworth Development Limited

As set out in our earlier correspondence, LDL, a subsidiary of Salhia Real Estate, is promoting **J25 Bar Hill** (previously referred as Land at Slate Hall Farm), on the north side of the new Junction 25 of the A14 (see Call for Sites Form ID: 40248), for a **leading edge sustainable employment park development** with business and logistics capability and capacity. The proposed site is responsive to the employment need and demand across the area, benefits from excellent strategic accessibility, and suitability outside of the Green Belt, and is well located relative to proposed new residential developments.

Structure of Representation

This representation is set out to follow the structure of the form provided to guide responses to the detailed policies in the First Proposals. As requested, we have also submitted these responses via the online consultation system. We have also included a number of appendices comprising:-

- **Appendix 1:** Employment Land Need and Demand Review Assessment
- **Appendix 2:** Greater Cambridge's HELAA Site Assessment ref.40248
- **Appendix 3:** Lichfields' HELAA Site Assessment Update
- **Appendix 4:** HELAA Technical Appraisal Reports, including:-
 - i Flood Risk Technical Appraisal Report, prepared by MJM Consulting Engineers

- ii Landscape and Townscape Technical Appraisal Report, prepared by FPCR
- iii Biodiversity and Geodiversity Technical Appraisal Report, prepared by FPCR
- iv Historic Built Environment Technical Appraisal Report, prepared by RPS
- v Archaeology Technical Appraisal Report, prepared by RPS
- vi Accessibility to Services and Facilities Technical Appraisal Report, prepared by Vectos
- vii Site Access Technical Appraisal Report, prepared by Vectos
- viii Transport and Roads Technical Appraisal Report, prepared by Vectos
- ix Noise, Vibration, Odour and Light Pollution Technical Appraisal Report, prepared by Sharps Redmore
- x Air Quality Technical Appraisal Report, prepared by Redmore Environmental
- xi Contamination and Ground Stability Technical Appraisal Report, prepared by MJM Consulting Engineers
- xii Strategic Highways Impact Technical Appraisal Report, prepared by Vectos
- xiii Agricultural Land Survey and Map, prepared by Ministry of Agriculture, Fisheries and Food

Policy Commentary

Duty to Cooperate Statement and Statement of Common Ground

The National Planning Policy Framework (NPPF) Paragraph 24 identifies that, *“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*

Pg.43 of the supporting text of the GCLP identifies that:

“In preparing our evidence informing the preferred strategy we have engaged with relevant organisations under the legal duty to cooperate on plan making, to ensure we have fully considered strategic cross-boundary matters. The engagement we’ve completed to consider these strategic issues is set out in our Duty to Cooperate Statement of Compliance, and our current position on each substantive issue is set out in our draft Statement of Common Ground. The water supply challenge addressed above is a serious issue to be resolved. Apart from this, we are not currently aware of any unresolved strategic cross-boundary matters that would prevent the preferred strategy from being delivered. However, should it be proven that we cannot deliver our strategy because of any reason later in the plan process, then we will need to talk with our neighbours. We will continue to engage with all relevant organisations as we take the plan forward.”

Having reviewed the Duty to Cooperate Statement in detail, we identify that there is reference to the potential implications of unmet employment needs under the Strategy ‘Strategic Topic’ (Appendix 4, pg.138 of the Statement) and the Councils’ discussion on 16th September 2020 as reported within the Statement. Of note, during that discussion as a key point was reported the *“need to explore the implications of emerging Greater Cambridge economic evidence in relation to the CPIER”*. At the same meeting, under the Transport ‘Strategic Topic’, it was also reported that *“Employment land, linking to ideas about distribution hubs...”* and the need for this to be discussed at the next meeting.

Although it appears that the issue of accommodating unmet employment needs across the area was raised within the context of this meeting, there is no further reference to this matter following that discussion. In contrast, the First Proposals Statement of Common Ground states (at pg.7) that: *“Sufficient development*

commitments and new sites exist to accommodate these growth levels within Greater Cambridge without the need to request that one or more neighbouring authorities should assist under the duty to cooperate.”

As we discuss further below, in our view, at that stage the appropriate evidence on employment land needs was not available in order to inform any meaningful discussion between Greater Cambridge Councils and surrounding authorities in relation to meeting strategic employment needs.

We do expect that the Councils will need to update their evidence and undertake a further round of discussions with the adjoining authorities to identify the appropriate levels of employment land across the Plan period as part of Local Plan Regulations 19. Lack of a clear and agreed evidential basis in terms of both informing and fulfilling the requirements of the Duty to Cooperate could represent a fundamental failing of the emerging Local Plan. Accordingly, it is paramount that these issues be properly addressed at Local Plan Regulation 19 Stage.

Sustainability Appraisal

The NPPF para 32 identifies that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

The GCLP First Proposals have been subject to Sustainability Appraisal which considers the preferred options in the First Proposals and reasonable alternatives (see pg.19 of supporting text). The GCLP concludes that:

“drawing on our evidence and consultation feedback, alternatives to our preferred option would either distribute development to less sustainable locations that are distant from Cambridge or without the benefit of very high quality public transport (existing or proposed) that would generate greater car use contrary to our climate change theme, or would require the release of large areas of Green Belt on the edge of Cambridge which would cause significant harm to the purposes of the Cambridge Green Belt. Full information regarding the testing of these alternatives can be found in the Sustainability Appraisal accompanying the First Proposals.”

However, having reviewed the Sustainability Appraisal, we consider that the Appraisal fails to properly assess options in relation to employment land requirements under the following objectives:

- SA 12.6: Does the Plan support development which is in close proximity to city, district and rural centres, services and facilities, key employment areas and/or public transport nodes, thus reducing the need to travel by car?
- SA 14.1: Does the Plan provide for an adequate supply of land and the delivery of infrastructure to meet Greater Cambridge’s economic and employment needs?
- SA 14.2: Does the Plan support opportunities for the expansion and diversification of businesses?
- SA 14.5: Does the Plan support stronger links to the wider economy of, and contribute to meeting sustainable economic growth envisaged across, the Oxford-Cambridge Arc?
- SA 15.1: Does the Plan provide for employment opportunities that are easily accessible, preferably via sustainable modes of transport?

As we set out in more detail below, we consider that the existing employment evidence is not sufficiently robust as it fails to provide a full and objective assessment of distribution and industrial needs. In the absence of this, the GCLP Sustainability Appraisal assesses the emerging Policy J/NE: New employment development proposals with “No Policy” as the only alternative option (SA, pg.322). Given the requirements of para 83 of the NPPF to plan “...for storage and distribution operations at a variety of scales and in suitably accessible locations”, we are not convinced that “no policy” can be regarded as either a legitimate or single alternative option for the purposes of appraising the Local Plan. We would expect that the Sustainability Appraisal of the Local Plan Regulation 19 will assess appropriately the alternative options of the emerging Policy J/NE and any other policy in relation to strategic employment requirements and land supply.

Policy S/JH: New jobs and homes

The emerging *Policy S/JH: New jobs and homes* identifies that the GCLP will provide 58,500 new jobs over the Plan period from 2020 to 2041.

The Greater Cambridge Employment Land Review & Economic Development Evidence Study (the ‘2020 ELEDES’), which has informed the emerging proposals, concluded that the recommended lower and upper forecast range referred to as central growth (+58,400 jobs) and higher growth (+78,700 jobs), respectively, “should be used for Local Plan purposes”. However, paragraph 6.33 in the 2020 ELEDES states that:

“It is recommended that in planning positively for growth, the KS2 Higher Scenario is planned for regarding B1a/b floorspace, without making any implied assumptions regarding jobs growth [Lichfields’ emphasis]. This is recommended to ensure a flexible employment land supply encouraging growth in existing businesses and attracting inward investment. It also broadly aligns with completions trends and market feedback.”

Of note, the higher growth (i.e. recommended scenario) relates to an additional 78,700 jobs across the plan period (see 2020 ELEDES paragraph 6.11, pg.97). Therefore, there is an internal inconsistency across the Local Plan and its supporting evidence, and it is not clear how the recommended higher growth scenario of 78,700 jobs has been translated into the Local Plan’s lower provision of 58,500 jobs.

It should be also highlighted that the labour demand scenario is used to inform the employment space requirements for office and R&D uses, while light industrial, general industrial and storage and distribution space requirements have been based on the past trends scenario, and particularly a projection of the annual net completions between the monitoring years of 2011/12 and 2017/18, which is considered a very short period of time to inform policy recommendations over the next 20 years.

According to the 2020 ELEDES Table 10 (pg.94), the job growth associated with “2011-17 annual average change”, which is understood to reflect the recommended scenario for the industrial/warehousing uses, equates to 125,200 jobs across all sectors for the 2020 to 2041 period. There is no available data provided in terms of how these jobs are distributed across the various employment segments. As a result, there is no transparent evidence of how the proposed jobs growth is distributed across the various employment space types and on this basis, we consider that the evidence in relation to jobs growth estimation lacks transparency and robustness.

Moreover, it is understood that the estimation of the office and R&D jobs growth is based on a series of forecasts highlighting a policy-on view on how those sectors (which are considered historically as the key drivers of the local economy) are expected to grow further. The emphasis on office-based segments appears

to characterise the approach in the Local Plan as a whole, and which therefore does not acknowledge the importance of other economic sectors, including logistics and industrial-based activity.

Furthermore, paragraphs 6.36 to 6.37 state:

“6.36 The labour demand forecasts for B1c/B2 floorspace should be viewed cautiously. Recent completions trends show a slow down in light / heavy industrial floorspace loss as the manufacturing and related sector of the economy stabilises after a period of decline. Market feedback suggests demand for light industrial floorspace which is reflected in gains in South Cambridgeshire and market pressure in Cambridge [Lichfields emphasis]. It is recommended that industrial floorspace losses are limited in the city to avoid constraining business and industrial activity. In reality there may be some further losses in Cambridge, which should be minimised, but gains in South Cambridgeshire are expected regardless.

6.37 Similarly, with B8 warehousing needs, the completions trends show a higher level of floorspace than the labour demand model with losses in Cambridge and gains in South Cambridgeshire. The logistics sector is experiencing a high level of change due to increases in e-commerce and greater levels of automation particularly in larger units [Lichfields emphasis]. This may change the relationship between labour requirements and floorspace needs. Given delivery has been steady in South Cambridgeshire across the tested completion periods whilst losses have increased in Cambridge and are likely to continue, it is recommended that the recent net trends are planned for.”

Although the evidence demonstrates clearly that there are specific market signals showing ‘market pressure’ in Cambridge City together with demand for larger units as e-commerce increases and automation evolves, both the evidence and the emerging policies choose to ignore these signals and are driven by policy choices to focus on the office-based economy. This is contrary to:

- NPPF Paragraph 81: ‘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’,
- NPPF Paragraph 82 ‘planning policies should: d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices...and to enable a rapid response to changes in economic circumstances’; and
- NPPF Paragraph 83 that sets the requirement for the policies to recognise and address the specific locational need of (inter-alia) storage and distribution operators at a variety of scales and in suitably accessible locations.

Therefore, we conclude that the evidence that informs the emerging policy over the next twenty years is not proportionate nor is it objective. This contradicts with NPPF Paragraph 35 point ‘a) Positively prepared’ that requires the plans ‘to seek to meet the area’s objectively assessed need’ and point ‘b) Justified’ that requires ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’.

Lichfields has reviewed the existing evidence and prepared an updated analysis in relation to logistics requirements across the Plan period in Greater Cambridge (Appendix 1). Based on our analysis, there are various inconsistencies and deficiencies within the Councils’ evidence that, in our view, means the anticipated B8 and the combined E(g)(iii)/B2/B8 requirements and jobs growth are significantly underestimated.

In particular, both jobs scenarios of 58,400 or 78,700 additional jobs across the Plan period suggest that over the next 20 years B8 jobs will grow by 457 jobs or 21.7 jobs per annum, while the combined E(g)(iii)/B2/B8 equivalent will decrease by 1,339 jobs or by -63.7 jobs per annum across the Plan period (Table 13, pg.99). This contradicts the market signals and recent activity that highlight pressures to identify additional

employment land in Greater Cambridge to avoid losing businesses that want to either invest or expand in the area.

Lichfields' updated assessment of logistics land requirements (as set out in Appendix 1) suggests that additional B8 job growth of around 3,100 jobs to 5,700 jobs should be anticipated across the Plan period, once the strategic logistics requirements are considered as identified by NPPF and PPG.

As a result, it is not considered that the emerging policy is soundly-based. There is need for the supporting evidence to objectively and robustly identify employment requirements across office, industrial and storage and distribution uses rather than taking a policy-on view that largely focuses on office growth and does not adequately assess the needs arising for other segments of the economy.

Policy J/NE: New employment development proposals

The emerging Policy J/NE New employment development proposals sets out whether proposals for employment uses within Classes E(g), B2 and B8 will be supported. According to the emerging policy, such developments will only be allowed at sites set out in the Proposed Policy S/DS: Development strategy, within towns and villages where it is of an appropriate scale, in a list of 'established employment areas in the countryside' or where expansion of existing businesses fulfil a number of criteria (described in the justification). The emerging policy, then, states at the end that *"Large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge"*.

From our review, it appears that this approach has been justified by the following paragraph:

"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 greenbelt location, it is proposed that the plan continues to not support large scale regional and national distribution proposals."

The 2020 ELEDES that underpins the emerging Policy J/NE identifies a combined office, R&D, industrial and storage and distribution need of about 664,300 sq.m, of which just over 46,930 sq.m relates to storage and distribution uses (within B8 Class). When these figures are compared with the identified supply position, it results in a shortfall of 24,470 sq.m for storage and distribution space, and a combined shortfall of c.76,940 sq.m for the industrial and distribution space across Greater Cambridge to 2041 according to the Council's evidence.

A detailed review by Lichfields of the 2020 ELEDES (as set out in Appendix 1) indicates a number of deficiencies in the evidence which has been produced, which we consider point to a significantly greater level of need for B8 storage and distribution floorspace in Greater Cambridge than is recommended in the study. This is set out in Chapter 2 of Appendix 1. A briefing note summarising these findings was shared with Greater Cambridge planning policy team on 26 November 2021.

In short, the review indicates that the requirements identified in the 2020 ELEDES for storage and distribution floorspace are at least 50% to 115% lower than the level of need within Greater Cambridge when considering the latest data, and applying a more consistent approach in estimating employment needs. It should be noted that these reflect net requirements, without considering any allowances for flexibility or losses replacement. Most importantly, these requirements relate to local, indigenous requirements for small businesses operating in storage and distribution-based sectors across the area and does not reflect the

strategic requirements that are identified across the appropriate market area as set out in the PPG Paragraphs 26 and 31 and NPPF Paragraph 83.

In our view, the need for storage and distribution has been effectively overlooked by the emerging Local Plan, counter to the NPPF's requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales, and the PPG's guidance in [‘How can local authorities assess need and allocate space for logistics?’](#) (Paragraph 31). On this basis, we have identified the lack of the evidential basis to robustly justify the emerging Policy J/NE stating that large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge, which clearly undermines the soundness of the Plan as currently proposed.

We recommend that Greater Cambridge must therefore now seek to properly assess and have regard to the requirements for storage and distribution operations of all scales and in suitably accessible locations in line with NPPF, taking account of the relevant FEMA and PMA, and to provide for such facilities. This requires a full assessment of strategic distribution needs, and an appraisal of all the available supply options to accommodate those needs, once identified. This is critical in order for the emerging Local Plan to be compliant with NPPF (Paragraphs 32 and 83) and PPG on Economic Need (Paragraph 31).

In the current absence of available evidence being prepared for the Councils, Lichfields has reviewed the existing evidence base and undertaken analysis of strategic distribution needs. This analysis was supported by detail market evidence from two of the most active commercial agents across the market, namely Savills and Bidwells (these market reports comprise part of Appendix 1). Both the market reports support that there is high demand for more additional employment space to serve Greater Cambridge and the wider market.

Our analysis as presented in Appendix 1 indicates that the appropriate scale of storage and distribution requirements arising in Greater Cambridge as part of the requirement identified across the relevant strategic logistics Property Market Area (PMA), which extends beyond the identified Functional Economic Market Area (FEMA) to parts of Northamptonshire, Bedfordshire, Hertfordshire, Essex and Suffolk, is estimated to be between 69.0 ha and 85.5 ha. This range reflects patterns of Greater Cambridge's economic activity and employment representation across the market. This need is at least 500% to 630% above the proposed B8 requirements estimated by the 2020 ELEDES.

Lichfields scrutinised the identified supply across Greater Cambridge, and concluded that there is evidently only one site of 14ha developable area that can be genuinely regarded as suitable and available to accommodate strategic distribution uses. This represents just 2.8% of the requirement identified across the PMA, 8.7% of the FEMA's equivalent and 16%-20% of the need identified in Greater Cambridge itself. Synthesising the analysis, there is a shortfall of storage and distribution employment land in Greater Cambridge between 55.0 ha and 71.5 ha across the Plan period to 2041.

Some of this shortfall must be accommodated within Greater Cambridge rather than those areas that have historically been relied upon to accommodate logistics need across the PMA (such as Peterborough and Northamptonshire) to avoid compromising the functioning of Greater Cambridge's economy and to avoid a sub-optimal distribution network resulting in longer journeys by road and higher vehicle emissions.

Synthesising the above, the emerging Local Plan needs to consider updated evidence and to subsequently increase the employment supply across Greater Cambridge by allocating additional land of between 55.0 ha and 71.5 ha which is suitable, available and deliverable across the Plan period to 2041. This will align with NPPF and enable the soundness of the Local Plan.

Policy S/DS: Development strategy

The emerging Policy S/DS: Development Strategy sets out *the “proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge for the plan period and beyond to 2050”*. It identifies where the homes and jobs set out in Policy S/JH should be provided, in order to meet the vision and aims of the Local Plan.

The proposed development strategy is 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 ensuring all necessary utilities can be provided in a sustainable way.

We agree that it is fundamental that new developments are built in the most sustainable locations, for the environment, the economy and communities. However, there needs to be a recognition that this will mean different locations for different types of development, including greenfield locations for uses best located outside, but close to settlements such as employment hubs which have a servicing function for all other development sectors.

Locating logistics facilities close to urban centres enables the use of electric fleet and cargo bikes for last mile deliveries. In addition, this encourages workforce to travel to work via sustainable and more active transport modes, such as cycling, encouraging healthier lifestyles, decreasing congestion and improving the air quality.

At present, emerging Policy S/DS directs development to brownfield land and where it responds to opportunities created by proposed major new infrastructure. It then goes on to recognise that locations capable of providing sustainable development include the Cambridge urban area, edge of Cambridge, new settlements (namely Cambourne, Northstowe, Waterbeach and Bourn Airfield), the Rural Southern Cluster and limited development in the rest of the rural area.

We welcome that Policy S/DS recognises that appropriate development in the rest of the rural area including, *“new employment sites in the countryside meeting specific business needs”* and that Policy S/RRA identifies two manufacturing and warehousing allocations around the Swavesey junction of the A14. We agree that this quadrant of Greater Cambridge along the A14 is the most appropriate location to bring forward future economic opportunities and allow existing and new businesses to invest in the area. This location is served by the upgraded A14 and as such has high accessibility to the strategic network. In addition, this area is bounded by new residential developments including Northstowe (6,345 new homes across the Plan period), Cambourne West (2,590 homes), Cambourne (1,950 homes), Bourn Airfield (2,460 homes), Darwin Green (478 homes) and Eddington (3,142 homes). On this basis, significant additional labour supply will be available in this area over the plan period. Moreover, this location will encourage sustainable commuting to work and sustainable urban transport modes to deliver services in the City.

Given the clear sustainability benefits of locating such business along the strategic road network with minimal local highways trips and the recent major infrastructure improvements to the A14, we would encourage Policy S/DS to explicitly recognise that J25 Bar Hill, which is located outside of the Green Belt provides a valuable, sustainable, suitable and appropriate location for development, and support further development in this location.

Policy S/RRA: Site allocations in the rest of the rural area

The proposed Policy S/RRA: Site allocations in the rest of the rural area “allocates sites for homes or employment that support the overall development strategy within the rural area, excluding the rural southern cluster”.

The supporting text adds that:

“For employment, we considered the evidence from our Greater Cambridge Employment Land Review & Economic Development Evidence Base (2020) to understand the locational demand of different sectors. We then reviewed site opportunities to identify the preferred list of sites. The site selection was informed by the Housing & Employment Land Availability Assessment, and taking into account sustainable travel opportunities alongside the likely travel requirements of the proposed uses. We identified land that could respond to the need for local warehousing and distribution with good access to the highway network. We also identified some small-scale opportunities in accessible locations which could add the mix and types of land available.”

The J25 Bar Hill site is not allocated for development. Instead, the GCLP makes two allocations within the rest of the rural area that include an element of light industrial, warehousing and/or distribution uses (Use Classes B2 and B8). This list does not include Classes E(g)(i) Offices to carry out any operational or administrative functions, E(g) (ii) Research and development of products or processes; and E(g) (iii) Light Industrial processes. It also does not include allocations for replacement of existing floorspace (e.g. S/RRA/OHD Old Highways Depot, Twenty Pence Lane, Cottenham).

- **S/RRA/SAS Land to the south of the A14 Services:** 18.2ha suitable for Class B2 (General Industrial) and Class B8 (Storage or Distribution) providing a range of small and medium sized units.
- **S/RRA/CR Land at Buckingway Business Park, Swavesey:** 2.1ha for Class B2 (General Industrial) or Class B8 (Storage or Distribution). B8 use would be limited to small to medium sized premises.

Based on the above, the GCLP would be providing up to 20.3ha (based on our assessment in Appendix 1, the developable area is much less) of Class B2/B8 floorspace within the Rest of the Rural Area. There are no further allocations for Class B2/B8 floorspace in the emerging GCLP¹.

Moreover, and as detailed in our response to Policy S/JH (New jobs and homes), the ELEDES’s storage and distribution uses floorspace need projections are a significant underestimate. Instead, we have identified a requirement for allocating additional land of 69.0 ha to 85.5 ha for storage and distribution uses which is suitable, available and deliverable across the Plan period to 2041. Considering the developable supply position in Greater Cambridge, this results in a shortfall of strategic logistics land of 55.0 ha to 71.5 ha.

J25 Bar Hill has capacity to deliver around 60 ha of developable floorspace² and as evidenced by Appendices 3 and 4 of this Representation, is suitable, available and achievable, contrary to the conclusions of the

¹ We have excluded allocation ref. S/C/SCL Land South of Coldham’s Lane, Cambridge. This is a 9ha site suitable for commercial development (such as relocation of ‘space intensive’ uses such as builders’ merchants sales and storage facilities which are currently located elsewhere in the city).

² See Proposed Masterplan Plots with 10% BNG Landowner’s Retained Land drawing (ref. 4585/CA/00/00/DR/A/0085 Rev P3).



Greater Cambridge's HELAA Site Assessment ref.40248 (Appendix 2). The site's assessment is summarised at Table 2 overleaf.

Table 1 J25 Bar Hill Assessment Summary

Topic	HELAA RAG	Updated RAG	Commentary
Adopted Development Plan Policies			Site located c.400m from the settlement of Bar Hill, on the north side of the new Junction 25 of the A14. Situated outside the SCLP (2018) Development Framework (Policy S/7) and the Green Belt (Policy S/4). Policy E/11 states that large scale warehousing and distribution centres will not be permitted in South Cambridgeshire.
Flood Risk			Site-specific hydraulic modelling demonstrates that the area of the site within FZ3 is 0.44% and FZ2 is 2.72%. These areas of the site are located adjacent to Oakington Brook which would not be built on.
Landscape and Townscape			Site should have been assessed as 'Green' in Landscape and Townscape terms i.e. <i>'Development of the site would have a detrimental impact which could be satisfactorily mitigated.'</i> Whilst potential future development is likely to result in some adverse effects in these terms, it is clear from a site-based appraisal that these effects can be mitigated and minimised. It is also clear that existing landscape features within the site can be conserved and extended as the basis for a robust landscape framework and setting to future development.
Biodiversity and Geodiversity			No statutory or non-statutory sites of nature conservation importance within 5km of the site. There are a number of protected/notable species records that fall within the site, to be assessed with application (none listed as a Priority Habitat). Proposal would be capable of achieving a c.12-20% biodiversity net gain on site.
Open Space/ Green Infrastructure			No Technical Report has been prepared as the GC Assessment score was Green.
Historic Environment			There are no designated or non-designated heritage assets within the site. A Grade II milestone is located within 1km, to the southwest. Within a wider buffer zone of 1km to 2km, there are 33 further designated assets. Any potential impact on the wider setting of these heritage assets can be mitigated by landscaping and design measures.
Archaeology			There are a number of known non-designated heritage assets within the site: Important Mesolithic and Roman period remains – located in the eastern third of the site. There is potential for further unknown remains elsewhere within the site. None of the identified assets would preclude allocation of the site for major development or would prevent its future development.
Accessibility to Services And Facilities			The assessment criteria is not necessarily suited to employment sites. The relevance of achieving a Green score by virtue of being close to schools is clearly debatable. The site should be scored higher in the context of proximity to cycle and public transport networks. The assessment is incorrect in this regard. With proper consideration of criteria that are relevant to employment sites, such as proximity to cycle and public transport routes and location in the context of existing and new communities (including Northstowe (6,345 new homes across the Plan period), Cambourne West (2,590 homes), Cambourne (1,950 homes), Bourn Airfield (2,460 homes), Darwin Green (478 homes) and Eddington (3,142 homes)), the site would achieve a higher score.
Site Access			Vectos agree with the assertion that access is suitable in principle and that some refinement of the proposals will be required through the detailed design process. Without a clear understanding of how sites might achieve a Green

Topic	HELAA RAG	Updated RAG	Commentary
			score, they consider the Amber score to be appropriate. Wider comments associated with National Highways and the Strategic Road Network should be removed where they are not relevant to the nature of the immediate site access.
Transport and Roads			The HELAA references a Transport Assessment for the site which has not been made visible as part of the evidence base. The assessment criteria identify how sites might be scored Red. For many of these criteria the HELAA concludes elsewhere that the site is suitable. Based on other criteria there is no evidence to suggest a negative outcome. With reference to another employment site, clear inconsistencies of scoring are apparent. The proximity of the site to emerging communities such as Northstowe, which is a positive in a sustainable transport sense, combined with the conclusions elsewhere that capacity on the newly improved local highway network is available, suggests that the site should receive at least an Amber score. There are no identifiable reasons for scoring the site Red.
Noise, Vibration, Odour and Light Pollution			A baseline noise survey has been undertaken by Sharps Redmore. Existing noise levels are characterised by road traffic on the A14 and local road network. At night activity on the local roads reduce and noise from the A14 dominates. In terms of operational noise, the key impacts from industry and warehousing uses would be noise from fixed mechanical plant serving the units, service yard activity and noise break-out from units. Operational vibration is not considered, as this will have no impact. Sharps Redmore therefore conclude that the assessment score should be Green.
Air Quality			Site is partially within AQMA, however, SCDC's monitoring data shows pollutant concentrations have been below relevant AQO's (less than 40µg/m3 of NO2 and PM10) since 2014 and the AQMA is intended to be revoked. Further observations by DEFRA shows pollutant concentrations well below AQOS (9.7-11.4µg/m3 NO2 and 17.1-18.3µg/m3 of PM10).
Contamination and Ground Stability			Series of investigations of the site have already been carried out which conclusively show no presence of contamination and suitable ground stability.
Strategic Highways Network			It is unclear what models or data was used in order to determine the relative capacity of the SRN across the area. The Zone within which the site is located suggests some, albeit limited capacity for growth. Whilst the conclusion is somewhat surprising given the recent improvements to the A14 in this area and Junction 25, this allows a later assessment to confirm the suitability of the site and proposals, and therefore the site is considered suitable.

Source: MJM Consulting Engineers, FPCR, RPS, Vectos, Sharps Redmore, Redmore Environmental and Lichfields

As evidenced above, the site is suitable, available and achievable and would help to meet Greater Cambridge's employment need over the plan period to 2041, in accordance with the requirements of the NPPF.

The allocation of J25 Bar Hill for a sustainable leading-edge employment park development with business and logistics capability and capacity of around 60ha to meet the identified shortfall of employment land across the Plan period would fully align with emerging Policy S/DS and NPPF Paragraphs 11 and 83. Further and as recognised on pg. 36 of the supporting text of the GCLP *"providing a healthy supply of land for*

business use should also help ensure land is affordable for all business sectors, including those which cannot afford higher cost space.”

Some of the clear planning benefits of allocating this site, over any others, include:

- 1 **Strategic highways access:** J25 Bar Hill is located just off Junction 25 of the recently upgraded A14, a key nodal point on the strategic road network, connecting the site with the Midlands ‘Golden Triangle’, London, the Freeports of Felixstowe and Harwich International and the existing employment provision in Greater Cambridge. The locational opportunity provided by the converging of many strategic roads around Cambridge for accommodating such strategic development on large sites would help meet local, regional and national employment need.
- 2 **Minimal impact on the local highway network:** given the location just off the strategic road network, it would not be necessary for larger delivery vehicles to use the local highway network, which would be required for comparable allocations on the edge of large settlements like Cambridge, contributing towards decreasing congestion, improving air quality and, overall, tackling the climate crisis.
- 3 **Site size:** the site has the capacity to deliver around 60 ha of developable space, contributing to meeting the identified employment shortfall of 55.0 ha to 71.5 ha across the Plan period. A single and large allocation is sustainable and offers the capability and flexibility of a range of unit sizes to respond to the spatial needs of different sectors, including the fast-growing and rapidly innovating logistics sector. This may not be possible for a series of smaller allocations. Further the site size offers the opportunity for extensive landscaping and greening with FPCR’s Biodiversity and Geodiversity Technical Appraisal (Appendix 4(iii)) identifying capability of achieving a c.12-20% biodiversity net gain.
- 4 **Proximity to existing and new settlements:** the site is close to new and proposed settlements of Northstowe (6,345 new homes across the Plan period), Cambourne West (2,590 homes), Cambourne (1,950 homes), Bourn Airfield (2,460 homes), Darwin Green (478 homes) and Eddington (3,142 homes). It is also in close proximity to the Waterbeach New Town. On this basis, the site will contribute to minimising workforce travel distances and maximise accessibility by sustainable transport opportunities such as bus or more active modes of transport such as cycling and/or walking. In addition, providing logistics facilities close to urban centres enables the use of electric fleet (which currently have specific distance limitations) and cargo bikes for last mile deliveries. These contribute towards decreasing congestion, improving air quality and, overall, tackling the climate crisis and contributes to the recently introduced [Net Zero Strategy: Build Back Greener](#).
- 5 **Opportunity for economic cluster on A14:** there are a number of comparable existing businesses along the A14 including Bar Hill and Trafalgar Way which is identified as an important advance manufacturing cluster in the north of Greater Cambridge. In addition, the two emerging employment allocations ‘S/RRA/SAS Land to the south of the A14 Services’ and ‘S/RRA/CR Land at Buckingham Business Park, Swavesey’ prove that Greater Cambridge recognise the dynamics of this location along the A14. The allocation of J25 Bar Hill would help to exploit agglomeration benefits and complement the employment and business space offer along the A14 Corridor.
- 6 **No major environmental and heritage constraints:** the site is outside of the Green Belt and as detailed at Table 2 above there are no major environmental or heritage constraints that we would anticipate preventing the delivery of this site. Critically, at FPCR’s Landscape and Townscape Appraisal (Appendix 4(ii)), the site has been assessed as ‘Green’ in Landscape and Townscape terms instead of ‘Red’ in the HELAA.

We would therefore recommend that Policy S/RRA (Allocations in the Rest of the Rural Area) is amended to include a new allocation for the J25 Bar Hill site for a major leading-edge employment park development with business and logistics capability and capacity.

Conclusion

We trust that our representation will be carefully considered, so as to inform the framing of the GCLP to help ensure that Greater Cambridge optimises its potential for contributing sustainable economic growth to 2041.

We would be pleased to discuss any of the points raised above and would welcome further engagement on the GCLP.

Yours faithfully

Steven Butterworth
Senior Director



Appendix 1: Employment Land Need and Demand Review Assessment

J25 Bar Hill, Cambridge

Logistics Land Need and Supply Assessment

Lolworth Developments Limited, Salhia Real Estate

December 2021

LICHFIELDS



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Appendix 1 Bidwells Market Report

Appendix 2 Savills Market Report

1.0

Introduction

1.1

This Logistics Land Need and Supply Assessment has been prepared by Nathaniel Lichfield & Partners ('Lichfields') on behalf of Lolworth Developments Limited ('LDL'), a subsidiary of Salhia Real Estate. The main purpose is to examine the industrial and logistics need for additional employment supply across Greater Cambridge and support the planning case for the proposed site allocation at J25 Bar Hill in the emerging Greater Cambridge Local Plan.

J25 Bar Hill

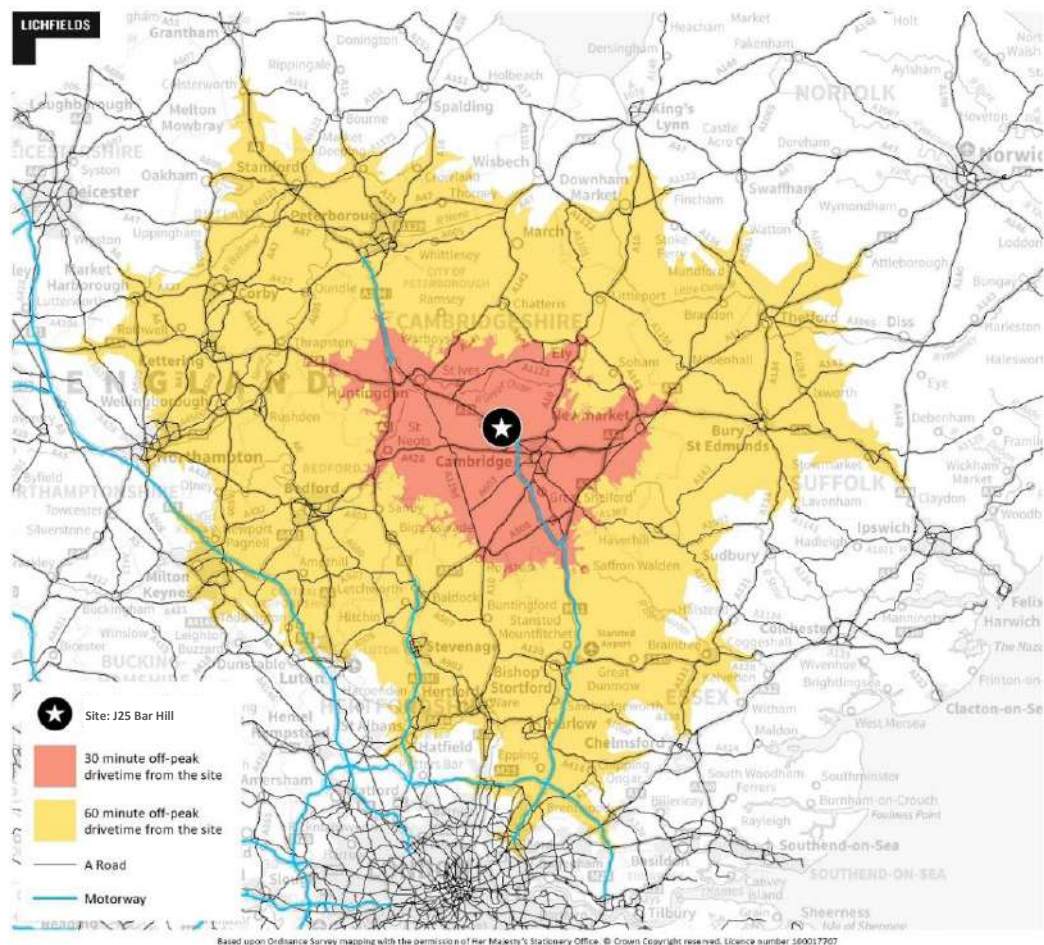
1.2

The site extends to approximately 100 ha (gross) and is situated 7 miles north west of Cambridge, adjacent to Junction 25 of the A14. It is primarily arable farmland but in the middle of the site there are existing commercial workshops. A small brook runs from west to east through the southern portion of the site and there are corridors of woodland which will be retained and enhanced. The site's developable area is estimated to be approximately 60 ha.

1.3

J25 Bar Hill is highly accessible to the strategic road network and is located within 1-hour driving distance from London (M25 Junction 6), St Albans, Luton, Bedford, Milton Keynes, Corby and Peterborough (shaded yellow in Figure 1.1), while Stansted Airport is within a 30 - minute drive-time (shaded red in Figure 1.1). In addition, the Midlands 'Golden Triangle' and the Port of Felixstowe are within 1 hour and 15 minutes.

Figure 1.1 Local and regional connectivity and accessibility



Source: Lichfields

- 1.4 In addition to being highly accessible, the site is free of environmental constraints, lying outside of Green Belt and is located opposite – south of the A14 – the Bar Hill industrial estate (including Trafalgar Way), which is identified as an important advanced manufacturing cluster in the north of Greater Cambridge.
- 1.5 It should be noted that the A14 has been significantly upgraded over the last few years and the new junction and supporting infrastructure has the potential to unlock significant economic opportunities across the area as it is a key road link between the M11 and A1(M). This potential has already been identified by the emerging policy that suggests two small industrial / warehousing sites be allocated across A14.
- 1.6 For all these reasons, J25 Bar Hill is considered an excellent candidate to accommodate industrial and distribution needs arising across Greater Cambridge and the associated economic market. On this basis, LDL proposes the site to be allocated for a sustainable employment development that will contribute significantly to meeting Greater Cambridge’s economic objectives and priorities, as set out in detail in Section 3.0.

Scope

- 1.7 This study focuses on the growth potential of the industrial and distribution sectors in Greater Cambridge, and the wider functional logistics market, across the Local Plan period to 2041. It examines if the identified supply is adequate to meet the economic objectives, fulfil the growth potential in the economic context of Greater Cambridge and, subsequently, to address the arising employment space requirements.
- 1.8 The [National Planning Policy Framework](#) (NPPF) (July 2021) in paragraph 83 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors and make provision for (inter alia) storage and distribution operations at a variety of scales and in suitably accessible locations.
- 1.9 The approach adopted in this study is in line to the Planning Practice Guidance (PPG) [Economic need assessments](#) and particularly paragraph 31 (Reference ID: 2a-031-20190722) that explicitly outlines an approach on ‘*how to assess need and allocate space for logistics*’.
- 1.10 In particular, this study considers:
- 1 Deficiencies in the Councils’ existing employment evidence. In particular, we explain the reasons why the methodology adopted in the Councils’ evidence base that underpins the emerging employment policies and allocations does not adequately assess the storage and distribution requirements of all scales as required by the NPPF;
 - 2 In absence of the above, the study assesses the strategic logistics needs arising in Greater Cambridge across the Plan period. On this basis, the remainder of the study considers:-
 - a The key economic priorities and strategies that J25 Bar Hill could efficiently support and an up-to-date assessment of the Greater Cambridge’s economic performance and growth potential;
 - b Local and wider market signals related to large scale industrial and logistics demand to evidence the characteristics of the local property market;
 - c The fully-assessed scale of logistics space requirements. We update the employment need estimates for storage and distribution in line with PPG. In this context, we also present the appropriate extent of the logistics market referred as the Property Market Area (the “PMA”) and the associated requirements arising for Greater Cambridge;

- d The adequacy of the identified employment supply. We assess the adequacy of the proposed allocations, ongoing development and extant permissions to accommodate future employment needs across Greater Cambridge and the logistics PMA.
 - e Why Greater Cambridge should accommodate some strategic logistics needs. We discuss the importance of accommodating the appropriate share of market's needs to avoid compromising the growth and strengths of Cambridge's economy.
- 3 Finally, the study outlines the Councils' interpretation of the evidence. We consider the deficiencies in how the Councils have interpreted their own evidence in preparing the draft Local Plan, which indicates that the Local Plan is not compliant with NPPF (paras 32 and 83) and the PPG on planning for the logistics sector (para 31).

Report Structure

1.11

The remainder of the report is structured as below:

- **Section 2.0: Existing Employment Evidence** – a review of the existing employment evidence underpins the emerging Local Plan explaining the deficiencies and the reasons why this is not robust and requires updating.
- **Section 3.0: Economic Context and Growth Potential** – providing an up-to-date, proportionate assessment of the local and regional economic performance.
- **Section 4.0: Property Market Assessment** – a review of local and wider market signals with the use of proprietary datasets and liaising with locally active commercial agents.
- **Section 5.0: Assessment of Industrial and Logistics Land Requirements** – a review and update of emerging local evidence on identifying demand for industrial and storage and distribution employment land.
- **Section 6.0: Adequacy of Current and Emerging Industrial Supply** – identifying, quantifying and assessing the adequacy of the current and emerging supply to accommodate the arising needs.
- **Section 7.0: Demand and Supply Position** – comparing the identified supply against the strategic needs arising across Greater Cambridge.
- **Section 8.0: Conclusions** – synthesising the analysis, outlining the Councils' interpretation of their evidence and drawing overall conclusions.

2.0 Existing Employment Evidence

2.1 The emerging local plan considers the employment land need identified in the [Greater Cambridge Employment Land and Economic Development Evidence Study \(2020\)](#)¹ (“the 2020 ELEDES”). The evidence identifies a combined office, R&D, industrial and distribution need of about 664,300 sq.m, of which just over 46,930 sq.m (7%) relates to storage and distribution uses (Class B8) (Table 2.1). This is even less than the logistics stock’s current representation of 22% against the total employment space in Greater Cambridge as set out in Section 3.0 paragraph 3.28.

2.2 When these figures are compared with the identified supply position, it results in a shortfall of 24,470 sq.m for storage and distribution space, and a combined shortfall of c.76,940 sq.m for the industrial and distribution space across Greater Cambridge to 2041.

Table 2.1 Demand Supply by Type of Space in the 2020 ELEDES, Greater Cambridge 2020-2041 (sq.m)

Type of Space	Need (incl. 7.5% margin)	Supply	Balance
Blended Former B1*	n/a	283,708	283,708
Office/R&D	624,708	377,943	-246,765
Light Industrial/General Industrial	-7,330	-59,800	-52,470
Storage and Distribution	46,933	22,462	-24,471
Total	664,311	624,313	-39,998

* “Blended B1 is not an output of the demand modelling, whilst the B1 supply represents outline permissions / allocations where the final mix is not yet known”.

Source: GLH (2020), ELEDES Table 3, pg.11

2.3 The 2020 ELEDES considers the scale of the logistics sector in Greater Cambridge to be of a relatively smaller size than its counterparts in Peterborough, for example. Notwithstanding, there is potential for ‘last mile’ logistics companies in South Cambridgeshire where rents of warehouses are typically cheaper, but occupiers can still deliver goods to the whole of the Greater Cambridge area quickly and efficiently. This is particularly pertinent when considering that the sector has recently experienced high levels of change due to the e-commerce boom and greater levels of automation leading to differing levels of labour requirements and floorspace needs relative to historical trends. Flexible and elastic supply of floorspace would help to maximise the growth potential of the logistics sector.

2.4 The 2020 ELEDES highlights that Cambridge lacks a distribution hub for ‘last mile’ deliveries, along with a general theme that suggests there is a shortfall in warehousing/ logistics space within the area. Cambridge is seen as a desirable geographical location for larger logistics firms to serve the wider region and nation, however many firms currently choose to operate outside of Cambridge, either in a different city or on the outer edges of Cambridgeshire. Market intelligence, however, highlights that this is not a locational choice by those occupiers, but it is purely based on the availability of stock.

Evidence Review

2.5 A detailed review by Lichfields of the 2020 ELEDES indicates a number of deficiencies in the evidence which has been produced, which we consider point to a significantly greater level of need for B8 storage and distribution floorspace in Greater Cambridge than is recommended in the study. We consider each of these in turn below.

¹ Prepared by GL Hearn with SQW Ltd and Cambridge Econometrics and supported by Iceni Projects Ltd and Justin Gardner Consulting

Use of latest completions data

- 2.6 We note that the underlying data collection and analysis contained in the Council's employment evidence was largely produced prior to the COVID-19 pandemic. Furthermore, the storage and distribution requirements have been derived from net completion rates covering the 2011/12 to 2017/18 period, which is not a reliable basis upon which to forecast a 21-year Local Plan period and does not reflect the recent development and market activity.
- 2.7 Lichfields has considered the Councils' latest published completion data, and following the same methodology adopted in the 2020 ELEDES², calculates the updated net requirements for light industrial and general industrial will be 35,170 sq.m, and 70,350 sq.m for B8. This totals over 105,500 sq.m for industrial and distribution uses (+166% higher) across the Plan period without applying any allowances apart from a vacancy rate of 7.5% (reflecting the approach of 2020 ELEDES). As a result, latest data indicates that the B8 requirements will be at least 50% above that proposed currently. This is summarised in Table 2.2.

Table 2.2 Demand for Industrial and Distribution Space Based on Latest Completions Data (sq.m)

Type of Space	2020 ELEDES Need (2011/12 to 2017/18)*	Updated Need (2013/14 to 2019/20)	Difference
Light Industrial/General Industrial	-7,330	35,170	580%
Storage and Distribution	46,933	70,350	50%
Total	39,603	105,516	166%

* Including 7.5% vacancy margin to all positive rates, 2020 ELEDES Table 40, pg. 114

Source: GLH (2020), Greater Cambridge (AMR 2019, 2020) / Lichfields analysis

Inconsistency of approach to identifying needs

- 2.8 Moreover, there are inconsistencies across the adopted approach of the Councils' evidence that impact on the objectiveness and robustness of the findings. For example, reviewing the approach as explained in the 2020 ELEDES Table 39 (reproduced below) and in paragraph 6.38, it is apparent that the evidence supporting the need figure for B8 and the former B1c is influenced by policy aspirations.

Figure 2.1 2020 ELEDES, Table 39: Recommended Floorspace Requirements, Greater Cambridge (sq.m) (reproduced)

Use Class	Cambridge	South Cambridgeshire	Greater Cambridge	Source
B1a	38,491	64,730	103,221	Labour Demand KS2 (Higher)
B1b	88,852	389,050	477,902	Labour Demand KS2 (Higher)
B1c	-16,905	16,506	-399*	Net completions '12-'18
B2	-7,287	-17,787	-25,074	Net completions '12-'18
B8	-50,190	93,849	43,659	Net completions '12-'18
Total	52,961	546,348	599,309	-

Source: GLH (2020)

- 2.9 For light industrial uses (within the Former B1c Class), the ELEDES recommends the Council should plan for the positive requirement of 16,506 sq.m identified for South Cambridgeshire, and not the aggregate figure for Greater Cambridge which is negative (reflecting B1c losses in the City). By contrast, for B8 uses, the ELEDES recommends planning for the aggregate figure

² i.e. Projected net completion rates for the last seven monitoring years – covering the period between 2013/14 to 2019/20 for Cambridge City and South Cambridge.

for Greater Cambridge of 43,659 sq.m, which effectively offsets the significant positive floorspace requirement identified in South Cambridgeshire (+93,849sq.m) with the negative figure within the City (-50,190 sq.m), reducing the recommended B8 requirement to 43,659 sq.m. The justification for this approach is explained in paragraph 6.38 that states:

“It is of note that the above summary of needs provides a net aggregated position across the two authorities. In the case most notably of warehousing, these reflect past trends which include losses notably in the city, the relocation of which to South Cambridgeshire will be reflected in higher completions. If losses in the city are stemmed, which is expected not only from a policy perspective but as there are limited industrial sites available for redevelopment, the future need in South Cambridgeshire would be closer to the Greater Cambridge net position (43,659 sqm). For light industrial B1c it would be misleading to plan for the Greater Cambridge aggregated net position given the market requirements and the 16,506 sqm should be considered as required regardless of future losses.” [Lichfields’ emphasis]

- 2.10 The approach for identifying B8 requirements has therefore, effectively, been adjusted to reflect a policy-based assumption that, “losses in the city will be stemmed, which is expected not only from a policy perspective but as there are limited industrial sites available for redevelopment”. This contrasts with the approach for B1c, where the suggestion is to plan for the full level of need “regardless of future losses” given the market requirements (para 6.38). The evidence has therefore not genuinely considered the implication of planning for the unadjusted B8 requirements figure.
- 2.11 Had the same judgement been adopted for B8, the requirement would have been 93,849 sq.m³ (i.e. reflecting the South Cambridge requirement figure). Once the 7.5% vacancy rate is included, this totals 100,888 sq.m, which is **+115% above** the recommended B8 requirements for Greater Cambridge. On a similar basis, the combined figure for light industrial, general industrial and storage and distribution would have been 99,511 sq.m or +251% higher than the emerging equivalent.

Latest employment forecasts

- 2.12 The ELEDES was published in November 2020, and is based on modelling work undertaken in 2019 but essentially based on the East of England Forecasting Model (EEFM) 2017 with adjustments for more recent Business Register and Employment Survey (BRES) data and changes to key sectors based on analysis of past trends (see para 6.11). Furthermore, no account was taken of the effects of COVID-19 (as noted at para 5.19).
- 2.13 In this context, Lichfields has considered the latest employment forecasts (Experian, September 2021), that not only reflect COVID-19 but also factor in the terms of the Brexit agreement applied from 1 January 2021. Our analysis of these forecasts points to at least 222% higher need for industrial and distribution uses across Greater Cambridge. In particular, the combined employment need for light industrial and industrial uses across the plan period will be 3,000 sq.m and the need for storage and distribution will be 74,520 sq.m or **+59% higher** than that identified in the ELEDES, resulting in an industrial and distribution need of 77,520 sq.m across Greater Cambridge (+96%).
- 2.14 We have tested the above net requirements with the latest market data. Of note, the latest take-up trends for storage and distribution floorspace as recorded by CoStar indicate an average take-up figure across the last ten years of around 35,000 sq.m being leased or sold per annum across Greater Cambridge. When compared with current availability (as in October 2021), there is **only 1.2 years of supply** left to fulfil average levels of demand pointing to a strong market activity across the area in overall terms.

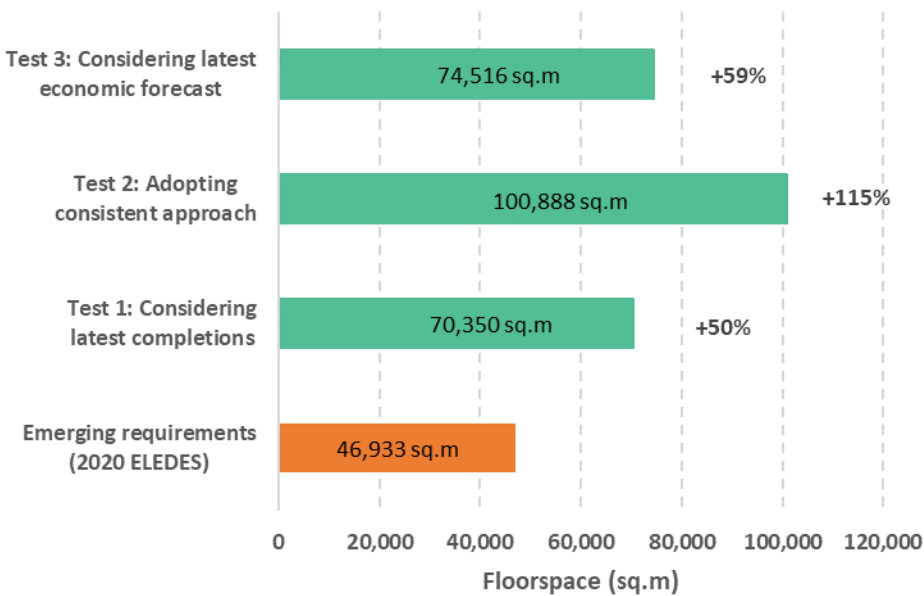
³ 2020 ELEDES, Tables 39 and 40, pg. 113-4

2.15 LDL have appointed leading agents Savills and Bidwells to compile detailed market intelligence. The preliminary findings of this analysis⁴ confirms that both Greater Cambridge, and the wider logistics PMA in which Greater Cambridge is located (see section 3.0), have reached a critical shortage in terms of pipeline supply. When combined with high levels of demand, this is resulting in severely constrained availability that not only prevents significant investment, but also forces existing businesses to either re-locate or constrain their growth potential, according to market intelligence. This situation is particularly acute in relation to large (i.e. above 9,300 sq.m) industrial and distribution units.

Summary

2.16 Figure 2.2 summarises the results of the above analysis for storage and distribution uses. This illustrates that the requirements identified in the 2020 ELEDES for storage and distribution floorspace are at least 50% to 115% lower than the actual level of need within Greater Cambridge when considering the latest data, and applying a more consistent approach in estimating employment needs. It should be noted that these reflect net requirements, including a vacancy rate average of 7.5% as adopted by the 2020 ELEDES. In other words, these do not include any further allowances, such as flexibility margin or allowance for replacement of losses, that might form part of the calculation of determining the planning requirements.

Figure 2.2 Storage and Distribution (B8 Use Class) Net Requirements in Greater Cambridge – Testing the emerging proposals



Source: GLH (2020), Greater Cambridge (2020), Experian (2021) / Lichfields analysis (rounded figures)

2.17 Synthesising the above, it is evident that the industrial and distribution emerging requirements identified in the 2020 ELEDES underestimate the latest market activity and economic developments and create the risk to compromise economic growth across the area. In any case, these requirements relate to **local, indigenous requirements for small businesses** operating in storage and distribution-based sectors across the area and does not reflect the strategic requirements that are identified across the appropriate market area as set out in the PPG para 026.

⁴ Both Bidwells and Savills’ market reports will be submitted with the representation to the Local Plan Consultation

- 2.18 In the absence of such evidence, the remainder of this report reviews the current economic context and overarching strategies, analyses the market signals, identifies the appropriate extent of the market to consider strategic distribution needs, provides an updated assessment of those needs in Greater Cambridge across the Plan period and assesses the adequacy of the emerging supply to accommodate those requirements.

3.0 Economic Context and Growth Potential

- 3.1 This section examines recent economic conditions and growth trends in Greater Cambridge and considers the area's potential for future economic growth identified in the existing economic strategies and plans for the area.

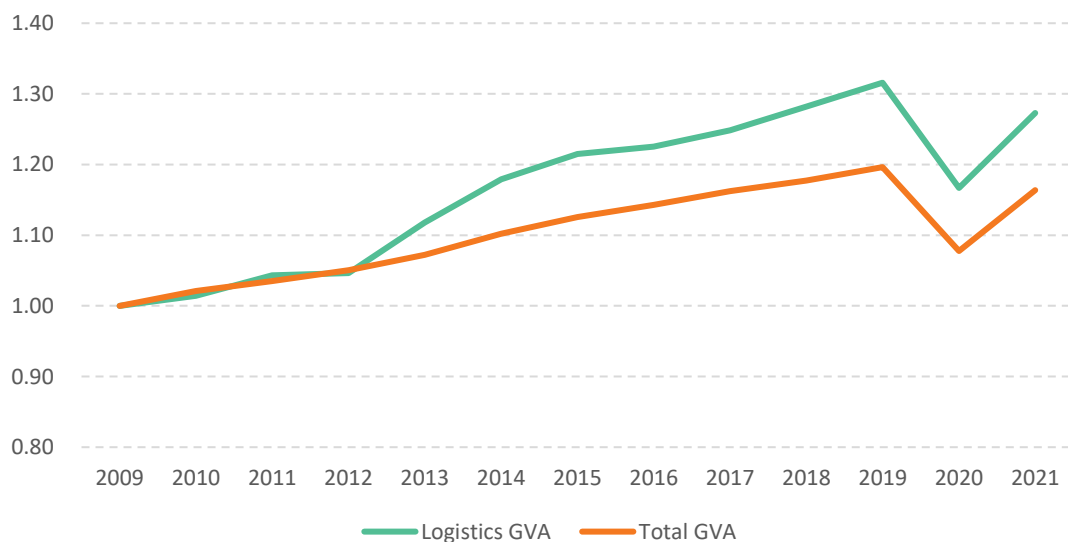
Context

- 3.2 This section presents the key economic and employment priorities in relation to industrial, and particularly distribution and storage operations as identified by national, regional and local strategies and planning policies.

National Trends

- 3.3 The NPPF (Paragraph 83) requires planning policies to recognise and address the specific locational requirements of different sectors, making explicit reference in the provision “*for storage and distribution operations at a variety of scales and in suitably accessible locations*”. This shows that there is a significant weight in logistics operations at national planning level, recognising the importance of the sector in the UK's economy.
- 3.4 The sector has proven to be a key player in the economy's rebound from the health crisis and the economic depression created since early 2020. It is one of the most fast-growing sectors nationwide, having seen an increase of 9.1% in GVA over the last year⁵. By comparison, the total GVA nationally has grown 8.0% over the same period. Wholesale, in particular, with over £103.3 billion GVA, rates fourth following Real Estate (£263.7 bn), Professional Services (£151.3 bn) and Retail (£105.4 bn) in terms of sectoral performance nationally. In addition, Air and Water Transport has seen the highest increase in GVA of 18% over the last year compared to a total of 38 economic sectors.

Figure 3.1 GVA Growth in the UK, 2009 to 2021



Source: Experian (June 2021) / Lichfields analysis

⁵ Experian Economic Forecasts (June 2021)

- 3.5 The [Future of Freight Demand \(2019\)](#) prepared on behalf of the National Infrastructure Commission provides an evidence-based analysis for the future of freight transport demand to 2050. Based on its findings, the road and rail freight services are expected to maintain their dominant role for the domestic distribution of heavy freight and goods to and from international gateways, such as Felixstowe. Under the 'Business as Usual' scenario there will be an increase of over 36% on road freight tonne km in the UK by 2050 and it is expected to impact the strategic road network that is already intensively used. This forecast factors in the population increase combined with the economic patterns of a service-based economy reflecting the increasing consumption requirements.
- 3.6 The 2019 study concludes that there is an opportunity to decrease road traffic significantly by emphasising on rail freight transport modes and consolidating distribution centres to rail- and water- connected areas, however it is still expected that road transport will be the dominant freight traffic mode in 2050.
- 3.7 For the Greater Cambridge area, the study shows that the A14 route (Felixstowe/Bury St Edmunds/ Cambridge/ Huntingdon), together with M11 and A11 (to Norwich) are expected to experience over a million road 'heavy' freight tonne km and over ten million 'light' freight tonne km⁶ in 2050, being the main freight traffic routes across the area. Felixstowe (referred also as Haven Port Group) is identified as a significant international gateway, which is forecast to see a significant increase (i.e. over 100%) in container and bulk traffic by 2050⁷.

Overarching Strategies

The Oxford to Cambridge Arc

- 3.8 The emerging Oxford to Cambridge Arc Spatial Framework will provide overarching spatial planning policies for the areas including Greater Cambridge and is identified as a national priority. The Arc area captures some of the UK's most productive, successful and innovative industries, most notably in STEM industries which are supported by the Arc's world class higher educational institutions. The underlying aim of the Arc as a strategic plan is to maximise the areas potential for sustainable economic growth through these clusters of industries⁸, however the role of logistics across the Arc will be significant as it is a key sector of the Arc's economy as presented in the graphs overleaf.
- 3.9 Notably logistics comprises the third most representative sector with over 249,000 workforce employment⁹. The sector produces nearly £11.0 billion Gross Value Added (GVA) per annum which equates to about 6% of the total GVA produced across the Arc annually¹⁰. Over the last ten years, employment has grown by 212,500 workforce jobs across the Arc (12%) reaching currently over 1.9 million workforce jobs. In absolute figures, logistics has seen an increase of 37,200 jobs – the third highest across the Arc since 2011, with a growth rate of 18% which exceeded the overall Arc employment growth rate of 12%. Similarly, the GVA of the sector increased by 24% across the same period, which is again the third highest across all the sectors.

⁶ Figure 27, pg.84 and Figure 35, pg.93

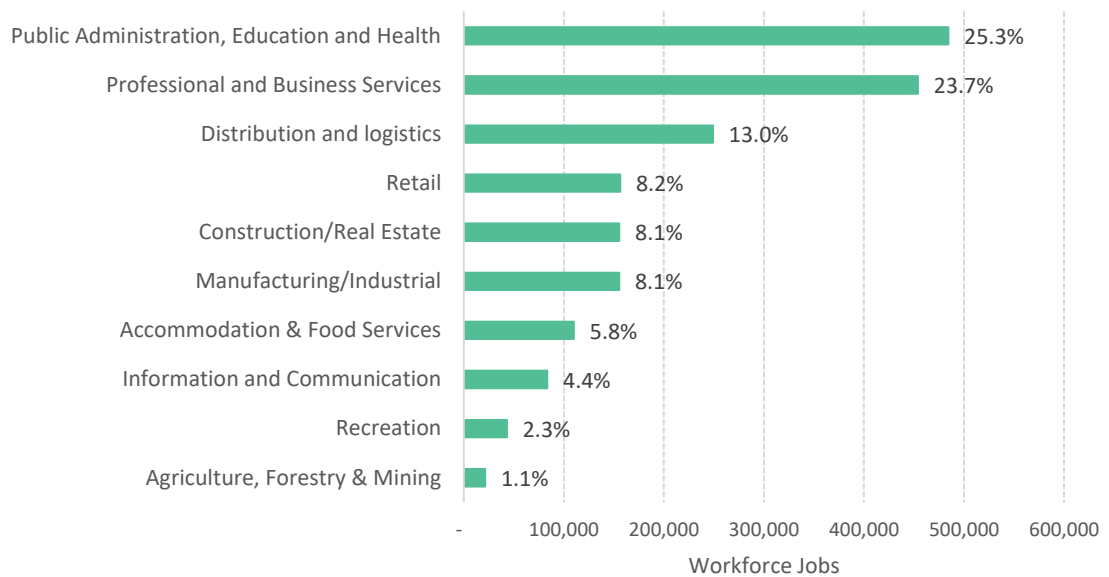
⁷ Table 20, pg.83; Table 21,pg.84

⁸ UK Government: Creating a vision for the Oxford-Cambridge Arc (2021)

⁹ Experian (2021)

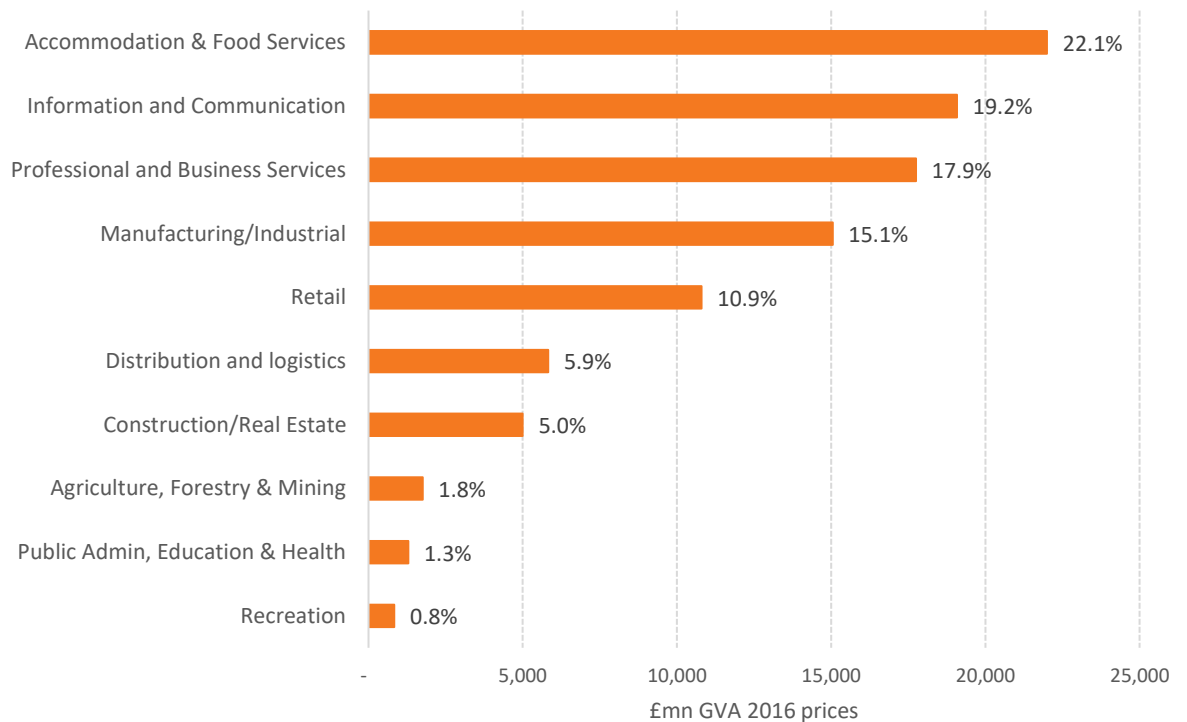
¹⁰ Experian (2021) - £ CVM 2016 prices

Figure 3.2 Employment by sector in the Arc, 2021 (% of Arc total)



Source: Experian (June 2021)/Lichfields analysis

Figure 3.3 Gross Value Added by sector in the Arc, 2021 (% of Arc total)



Source: Experian (June 2021)/Lichfields analysis

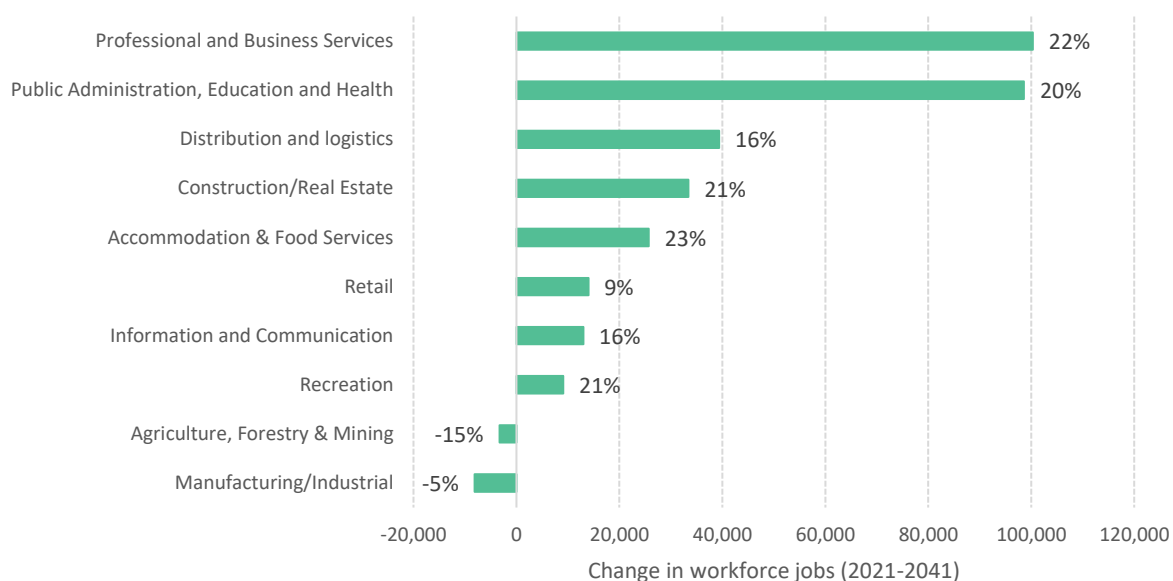
3.10

There is a high demand for distribution facilities across the Arc, which is an area of large population and high accessibility. The sector will further benefit from the increase in transport infrastructure investment across the area, which already possesses a strong level of demand for warehousing, logistics and distribution due to its location and current provision of

infrastructure. In addition, the future rise in homes, and subsequently population, will generate additional demand and combined with improvements in the transport network that will drive down costs for firms will increase further the attractiveness of the Arc for these operations.

- 3.11 Supporting analysis conducted in the British Property Federation report 'What Warehousing Where?' emphasises that 69 sq. ft. of warehousing floorspace is required for every new home built in England. This suggests that the targeted level of new housing associated with the OxCam Arc would require 69 million sq. ft. or 6.4 million square metres of new warehousing employment land¹¹.
- 3.12 Moreover, the Oxford to Cambridge innovation arc report states that there is already a projected undersupply of Class B employment land of circa 1,895 acres (i.e. 767 ha) of additional land that needs to be allocated across the Arc in order to meet the anticipated 5-year future demand. A significant element of this will relate to an undersupply of land for distribution and logistics.
- 3.13 Looking longer term over the next twenty years, it is projected that employment will grow by 322,100 workforce jobs across the Arc (16.8%) reaching over 2.2 million workforce jobs. In absolute figures, it is projected that professional and business services will see the highest increase of over 100,300 jobs, followed by public sector (+98,000 jobs), distribution and logistics (+39,400 jobs) and construction/real estate (+39,000 jobs) (Figure 3.4).

Figure 3.4 Forecast Employment Change in the Arc, 2021 to 2041



Source: Experian (June 2021) / Lichfields analysis

- 3.14 In terms of projected GVA, professional and business services (+£13.4bn), construction and real estate (+£9.1bn), public sector (+£7.3bn) and distribution and logistics (+£5.6bn) are those sectors with the highest absolute increase expected in the next twenty years.
- 3.15 Taken together, the forecasts indicate that there will be significant growth of the distribution and logistics sector over the next twenty years. It will be one of the fastest growing sectors in the Arc in terms of both employment and economic output.

¹¹ Savills: The Oxford-Cambridge Innovation Arc

- 3.16 Based on current market evidence and trends, the sector will continue growing in the area and there is now the opportunity for local planning authorities to proactively plan for the future growth of the sector.

Cambridge and Peterborough

- 3.17 The logistics, distribution and warehousing sector in Cambridge and Peterborough provides a significant contribution to the area's overall economy and are collectively recognised as supporting sectors towards the wider high-growth priority sectors. The Cambridge and Peterborough Independent Economic Review (2018)¹² identifies that the wholesale and retail distribution sector alone makes-up 33% of Fenland's and 28% of South Cambridgeshire's turnover.
- 3.18 The Cambridgeshire and Peterborough Local Industrial Strategy¹³ (LIS) highlights that the areas are well connected to the UK's transport network, particularly in Peterborough where many large firms have set up distribution centres. The significant share of the logistics sector is anticipated to continue and grow; as online shopping expands, the dynamics of the logistics sector is likely to change alongside the expected growth and therefore the LIS states the need for new allocations of suitable sites which will have to be well connected (or have the potential to be) to the transport network.

Employment Growth in Greater Cambridge

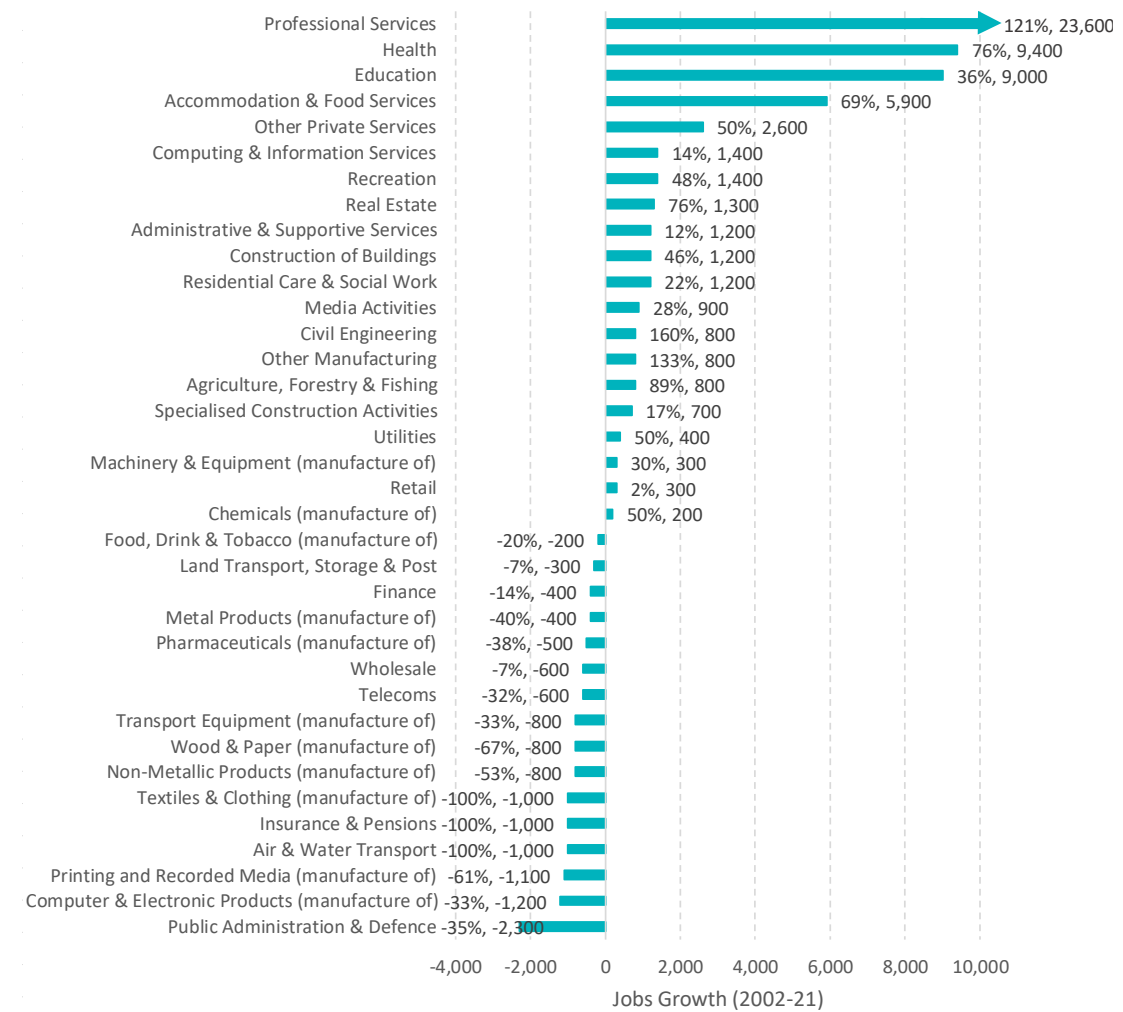
- 3.19 Business Register and Employment Survey data (BRES) suggests that between 2015 and 2020, Greater Cambridge saw an increase on its employment of 17%. In absolute figures, this relates to a gain of 30,920 jobs. Across the same period (i.e. 2015-2020), Experian data¹⁴ suggests that the growth across Greater Cambridge is 8.7% (+17,800 workforce jobs), which is half from what suggested by BRES.
- 3.20 Drawing on employment data from Experian, where data is available for longer term, it indicates a total employment growth of 45% between 1997 and 2021, while over the last twenty years (2002-2021, i.e. equivalent length to the emerging Plan period) there has been a growth of 30%.
- 3.21 Over the last 20 years, employment in professional services has grown by 23,600 jobs (121%), followed by health (+9,400 jobs), education (+9,000 jobs) and accommodation and food (+5,900 jobs). On the other side, public administration has seen the highest decline of 2,300 jobs (-35%), followed by decline in some manufacturing sectors, together with air & water transport and insurance & pensions sectors.

¹² Cambridge and Peterborough Independent Economic Review (2018)

¹³ Cambridgeshire and Peterborough Local Industrial Strategy (2019)

¹⁴ Experian (September 2021); Employment forecast covering the period between 1997 to 2041

Figure 3.5 Employment Growth in Greater Cambridge per Sector, 2002 to 2021

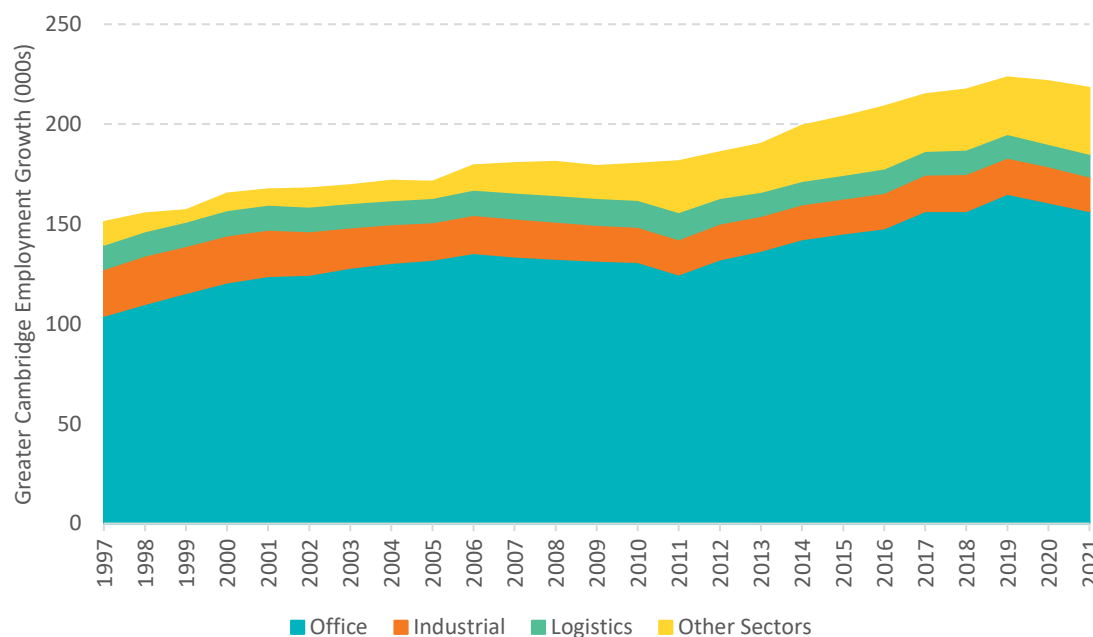


Source: Experian (2021) / Lichfields analysis

3.22

Once this sectoral jobs' growth is translated to employment use classes, office-based jobs are those grown the most, together with non-employment (i.e. service-based) sectors as presented in the graph overleaf. Jobs in logistics sectors have remained stable over the monitoring period and this relates mainly to the availability of stock across the sector (as analysed in the following section).

Figure 3.6 Employment Growth in Greater Cambridge, 1997 to 2021



Source: Experian (2021) / Lichfields analysis

Existing Logistics Stock

3.23

Based on the Valuation Office Agency (VOA) statistics¹⁵, there are approximately 2,400 strategic distribution units of over 9,300 sq.m each (i.e. 100,000 sqft) covering over 49.0 million sq.m of floorspace across England and Wales (Table 3.1). The East Midlands concentrates 19% of this floorspace, followed by North West (17%) and West Midlands (15%). The East of England concentrates a total of 255 buildings covering over 5.1 million sq.m, which represents 10% of the national strategic distribution floorspace.

Table 3.1 Strategic Scale Warehousing Capacity per Region (2019)

Region	Floorspace (000s sq.m)	Units
East Midlands	9,300	280
North West	8,400	340
West Midlands	7,500	260
Yorkshire and The Humber	6,800	250
East	5,100	170
South East	3,900	130
South West	3,000	100
London	1,800	100
North East	1,700	70
Wales	1,600	70
England and Wales	49,100	1,760

Source: VOA (2019) / Lichfields analysis – Rounded figures

3.24

Since 2015 the capacity of strategic distribution floorspace increased by around 16 million sq.m through an additional 640 units nationwide (Table 3.2). In absolute figures the East Midlands

¹⁵ VOA (2019) Non-domestic rating list

has seen the highest increase in terms of floorspace capacity, while the West Midlands seen the highest increase in terms of units.

Table 3.2 Strategic Scale Warehousing Capacity Growth per Region (2015 - 2019)

	2015-19 Change		2015-19 Change %	
	Floorspace (000s sqm)	Units	Floorspace (000s sqm)	Units
East Midlands	3,300	100	54%	36%
North West	1,900	90	30%	25%
West Midlands	2,900	120	61%	44%
Yorkshire and The Humber	2,000	80	42%	34%
East	1,900	90	60%	53%
South East	1,600	70	71%	54%
South West	1,100	40	58%	35%
London	500	20	35%	25%
North East	500	20	44%	34%
Wales	300	20	26%	25%
England and Wales	16,000	650	48%	37%

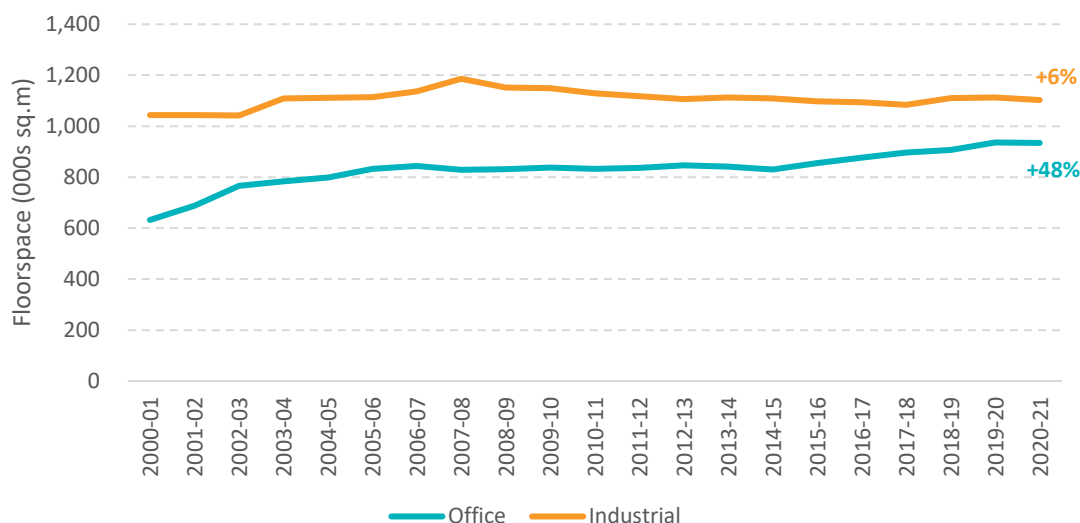
Source: VOA (2019) / Lichfields analysis – Rounded figures

- 3.25 A total of 90 units have been added in the stock of the East covering an additional 1.9 million sq.m of space. This represents an increase of 60% compared to the 2015 capacity, which is the third highest nationwide, showing that there is an increased activity and interest around the region. The South East has seen the highest increase (71%) which reflects also the demand around London and where most of the population nationwide lives, followed by the West Midlands where unsurprisingly is a key location for distribution activities, similarly to the East Midlands.

Stock in Greater Cambridge

- 3.26 There is a combined office and industrial floorspace capacity of 2.04 million sq.m in Greater Cambridge based on the VOA data, of which 54% relates to industrial (including logistics) floorspace and 46% to office. To put in context, the office stock across the East represents only 17% of the employment stock, while the national equivalent is just 21%. Therefore, it is evident based on the existing stock representation that Greater Cambridge has a strong office-based economy.
- 3.27 Over the last twenty years, office stock grew by 48% while the industrial was mainly stable (just 6% increase) as presented in the graph below. We can argue that these trends are an outcome of planning policy choice over the last twenty years to concentrate employment developments towards office-based sectors and discouraging the development of industrial and logistics facilities.

Figure 3.7 Growth in Employment Floorspace (000s sq.m)



Source: VOA (2021) / Lichfields analysis

- 3.28 In terms of logistics stock, Greater Cambridge has a total of 190 storage and distribution units of all sizes covering around 456,500 sq.m of floorspace. This represents just 22% of the entire employment stock and 41% of the industrial stock, highlighting the low representation of the sector across the area.
- 3.29 As shown in Table 3.3, there are only ten units of strategic scale (over 9,000 sq.m) covering around 242,100 sq.m cumulatively. Therefore, Greater Cambridge contributes by just 5% of the strategic distribution stock across the East.

Table 3.3 Warehousing Capacity in Greater Cambridge (2019)

Unit Size	Floorspace	Units
up to 1,000 sqm	50,400	130
1,000 to 2,500 sqm	41,000	30
2,500 to 5,000 sqm	73,100	20
5,000 to 9,000 sqm	49,800	10
Over 9,000 sqm	242,100	10
Total	456,500	190

Source: VOA (2019) / Lichfields analysis – Rounded figures

- 3.30 The vast majority of the distribution units in Greater Cambridge are small premises of up to 1,000 sq.m with a very limited availability of a larger stock. It should be also noted that within Greater Cambridge, South Cambridgeshire concentrates the vast majority of distribution units - i.e. around 160 units covering 407,500 sq.m (89.2%).

Summary

- 3.31 The key points of the economic context and growth potential analysis include:
- a Nationally, logistics has shown a significant growth driving the economic activity over the last few years. The sector is also predicted to grow further – at least by 36% to 2050. This figure was estimated at a pre pandemic level and the growth rate is now

expected to accelerate further (at a post pandemic era) based on the growth that has been experienced over the last year (+9.1%).

- b For the Greater Cambridge area, A14, M11 and A11 (to Norwich) are expected to experience over a million road 'heavy' freight tonne km and over ten million 'light' freight tonne km in 2050, being the main freight traffic routes across the area, while Felixstowe is identified as a significant international gateway, which is forecast to see a significant increase of over 100% in container and bulk traffic by 2050. The analysis shows that logistics was expected to increase across the area before the pandemic. This trend is expected to accelerate further following the sectoral growth over the last few years.
- c Employment growth in Greater Cambridge has historically concentrated in office-based sectors, which is reflective of the university-based economy. This is also demonstrated by the office stock growth of 48% together with the office stock's representation across the area of 46%. The equivalent in the East is just 17% and nationally just 21%.
- d However, growth in industrial and distribution-based sectors is reflective of the stock's availability which has been moderate (just 6%) across the area. As is explored in the following sections, this has to some extent been the result of planning policy which has prioritised housing on former industrial sites.
- e Finally, the stock of logistics floorspace is underrepresented across the area comprising just 22% of the employment stock. There are only ten units of over 9,000 sq.m across the area with the vast majority relating to small unit below 1,000 sq.m.

4.0 Property Market Assessment

- 4.1 LDL has commissioned two leading commercial agents, Bidwells and Savills, to assess the recent industrial and storage and distribution market signals in relation to Greater Cambridge. These reports are provided in Appendix 1 and Appendix 2.
- 4.2 This section summarises the key findings and presents how these market inputs have been considered by the logistics need assessment presented herein.

National Market Context

- 4.3 The commercial agents conclude that there is a strong link between the growth in on-line retail and the amount of warehousing space required nationwide. This is especially the case for the largest units of which take-up has driven record breaking levels in 2020 and H1 2021. Considering the latest on-line retail forecasts, agents suggest that there will be a requirement for an additional 60.2 million sq. ft. (5.6m sq.m) of new warehouse space, purely to meet the demands of the online sector by 2025 across the UK.
- 4.4 The size of buildings required – in terms of floorspace and height – by the logistics sector is increasing as operators seek to maximise operational efficiencies and to account for changing trends in configuration. Moreover, demand from the manufacturing sector is also high for increasing unit sizes and an increase in land requirements as occupiers seek bespoke buildings.
- 4.5 Whilst the pandemic and Brexit have created market uncertainty in some sectors, logistics and industrial operators have responded to this by increased stockholding and ‘on-shoring’. Trends in the manufacturing and distribution sectors at a national and regional level show significantly increased demand and a corresponding fall in supply over the last 18 months. The importance of locations within close proximity and easy accessibility to the ports is also a growing trend which according to the agents will directly impact on demand within locations in the East of England and along the A14.
- 4.6 Agents suggest that the market trends point to a significantly high demand for land for larger/ strategic scale sites, which are capable of accommodating the largest occupier requirements, and for land within easy reach of the principle ports.

Property Market Definition

- 4.7 In line with the requirements of PPG Paragraph 31, analysis has been prepared by Bidwells and Savills to understand the extent of the property market area for strategic logistics requirements in relation to Greater Cambridge. More details are also presented in Section 5.0 (paragraphs 5.3 to 5.12).
- 4.8 Logistics occupiers typically make locational choices based on the accessibility and drive times to/from their customer base and inward freight locations. On this basis, competing locations are generally focused along key transport corridors. Occupiers in the B8 sector can be footloose to a certain extent. However, they are driven by cost efficiency based on their supply chain dynamics. Whilst relatively wide search areas might be initiated by occupiers, they inevitably get narrowed down once these dynamics are taken into account.
- 4.9 The agents also highlight that the core search area will vary between occupiers, depending on individual business needs, locations of suppliers or retail stores and so on. Occupiers with requirements for the largest units (i.e. 500,000 sq ft and over) will specify a wider search area, driven mainly by necessity as a result of the severe undersupply of sites and premises of this

scale nationally. According to Savills, this is evidenced by a number of current live requirements of this scale nationally.

- 4.10 Manufacturing occupiers are generally less footloose than those in the B8 logistics sector. A manufacturing business would be unlikely to locate far from their core search area due to greater drive times to market, suppliers and labour supply.
- 4.11 On this basis, two market geographies can be defined. A core or immediate market which is the focused market around the study area and relates mainly to either manufacturing sector or smaller scale logistics sector, and the wider market which reflects that strategic logistics occupiers are more footloose and their locational choices are driven by land availability.
- 4.12 Combining the above, Savills concludes that there are two specific market areas in relation to Greater Cambridge. These comprise:
- the core market area, which extends across A14 corridor from Huntingdon to Bury St Edmunds and the A1 corridor from Peterborough to Biggleswade; and
 - the wider market area, which extends across A14 to Corby and Kettering; the M11 corridor to Junction 7; the A1(M), and Bedford, and broadly reflects a 45-minute drive time from the site along key distribution routes.
- 4.13 Similarly, Bidwells considers two markets, including:
- The ‘immediate property market’, which is the market in Greater Cambridge expanding to 20 miles from the City; and
 - The wider property market, which based on the occupiers’ requirements and live enquiries is defined across the A1(M), A14 and M11 corridors. In particular, this is bounded by Peterborough to the north, Bishop’s Stortford to the south, St Neots & Huntingdon to the west and Felixstowe to the east.
- 4.14 It is apparent, therefore, that the market recognises strong links across A14, M11 and A1(M) for larger scale industrial and logistics occupiers need. Synthesising the analysis, the area defined by Savills as the wider market area on a ‘best fit’ local authority basis has been adopted for the purposes of defining a logistic property market area (PMA) (see Figure 5.1 in the following section). The Bidwells analysis highlights the further influence of Felixstowe and associated flows from the port on the logistics market operating across Greater Cambridge, which adds to market demand pressures and activity within the area.

Local Market Trends

- 4.15 Both market reports conclude that there is significant demand across the market, which translates into strong ongoing levels of take up focusing mainly on the best quality units which can meet modern business requirements.
- 4.16 Nationally and locally, take-up of warehousing space has been at record levels for the past 18 to 24 months, despite new development being delivered. Take-up is driven by availability of high quality supply and where sites become available this can have a marked impact on historic take-up rates. This is evident by the case study of Suffolk Park in Bury St Edmunds, which granted outline planning permission in 2017 and since then the three-year rolling annual average take up rate climbed from a couple of thousands to over 41,000 sq.m.
- 4.17 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 Greater Cambridge, is likely to compromise future employment growth in the area.

- 4.18 Bidwells have identified that there is currently around 500,000 sq.m (5.35m sq ft) of live enquiries (as at December 2021) from occupiers specifically interested in being located in Greater Cambridge. These are further split to c290,000 sq.m (3.12m sq ft) for industrial uses within E(g) and B2 Class and c210,000 sq.m (2.23m sq ft) for storage and distribution space within B8 Class. The demand for industrial floor space has risen to its highest levels in 14 years, with more than 36% of requirements for buildings of over 4,600 sq.m (50,000 sq ft).
- 4.19 Based on data from Bidwells, there is also currently over 120,000 sq.m (1.3m sq ft) of demand for buildings above 9,300 sq.m (100,000 sq ft) from occupiers already located within Cambridge. These occupiers have been seeking sites/buildings to expand their business which have been thriving during the previous three to four years. However due to the lack of allocated employment land for sizable buildings they are being 'stifled in their growth aspirations' and are being forced to consider land/sites away from Cambridge, taking with them highly skilled jobs and economic opportunity.
- 4.20 The Greater Cambridge planning policy is focussed on the provision of new housing, with the local plans allocating a number of major existing industrial estates for future residential developments. A total of approximately 120,000 sq.m (1.3m sq ft) of occupied employment land in Cambridge City is allocated for residential development in the Cambridge Local Plan (adopted in 2018), with further sites such as Dales Manor and Unity Campus in Sawston also proposed to be allocated for non-employment uses according to Bidwells. Displacement of commercial occupiers has already begun, with c8,700 sq.m (94,000 sq ft) of industrial land being repurposed for residential or other uses, and a further c31,000 sq.m (333,000 sq ft) set to be redeveloped in the next two to three years according to Bidwells.
- 4.21 Many of these requirements would welcome the opportunity to establish themselves or have a facility close to Cambridge, but the lack of sites during the previous 10 years has restricted anyone seeking a facility of over 9,300 sq.m (100,000 sq ft) from accommodating themselves within the immediate Cambridge area. A recent example of this is CMR Surgical who have had to take a c7,000 sq.m (75,000 sq ft) build-to-suit unit up at Lancaster Way Business Park in Ely.
- 4.22 On a similar basis, Savills has also identified at least 34 live enquires from occupiers with interest to locate across the market, all of those with requirements above 9,300 sq.m (100,000 sq ft) totalling to at least c560,000 sq.m (6.0m sq ft) being currently on demand in the local market.
- 4.23 In terms of supply, the agents report a severe shortage of good-quality industrial and logistics stock combined with limited deliverable land for development within Greater Cambridge and the wider industrial and logistics market.
- 4.24 Based on Bidwells, supply of industrial floor space in Greater Cambridge fell to its lowest level in more than 20 years, with just over 19,300 sq.m (208,000 sq ft) on the market at the end of June 2021. This is a staggering vacancy rate of just 2.4%, highlighting the enduring shortage of accommodation. There are only two sites with outline planning consent for B2 and B8 uses currently available in Cambridge and within a 20 mile radius for occupiers seeking space of above 9,300 sq.m (100,000 sq ft). Bidwells also report that there are currently no industrial buildings of over 9,300 sq.m (100,000 sq ft) available in the local market.
- 4.25 On this basis, Bidwells concludes that there is less than one months' worth of supply at the current rate of take-up and therefore considers the identified logistics requirements across the emerging Local Plan to be "*woefully inadequate*". Finally, Bidwells highlights that Greater Cambridge lags behind other regional commercial centres such as Peterborough, Huntingdon,

Bury St Edmunds and Ipswich in its stock of industrial units and the shortage fails to support forecasted economic growth.

- 4.26 According to Savills, there is a critical shortage of both land and premises available to satisfy occupier requirements across the market. If take-up continues at historic average rates, the current consented and deliverable supply will be eroded entirely within 18 months. However, given the structural changes which have taken place in the market and the step change in demand over the last years, supply is very likely to be eroded even faster.
- 4.27 The majority of permitted sites (almost 70%) are only able to accommodate units at the smaller size ranges and this does not match the demand profile, with 38% of take up by floorspace being for units of over 500,000 sq ft (46,500 sq.m). Cambridgeshire has a particular undersupply in relation to previous take-up, with the area accounting for only 16% of available supply, but 25% of past take-up. On this basis, Savills concludes that the available land supply is severely insufficient in quantitative terms with only around 18 months in the core market area and 1.4 years of supply across the wider market area.
- 4.28 Indicative of the strength of demand and lack of supply, a significant proportion of land allocated within local plans across the property market area has either already been delivered (completed and fully let) or is in the process of being delivered, having been granted planning permission.
- 4.29 On this basis, Savills concludes that even assuming that all the sites within the local plan pipeline come forward (including both emerging and adopted allocations and permitted sites), there is less than 5 years of supply of strategic employment land in the property market area. This is a very low level of supply, particularly when the time period that the local plans are intended to cover is taken into consideration.

Summary

- 4.30 Bidwells and Savills have provided detailed market assessments to support this representation. Some of the key findings are summarised below:
- a Nationally the strategic logistics and industrial market has seen record levels of demand, particularly over the last 18 to 24 months when there has been a significant increase in on-line sales.
 - b Both the agents define the strategic logistics market in relation to Greater Cambridge crossing the areas around A1(M), A14 and M11. Although Savills highlights the importance of ports as key players in locational decisions, Felixstowe has not been considered as part of the wider market. In contrast, Bidwells has considered that the port impacts the entire market across the A14 including Cambridge and on this basis, they include East Suffolk within the wider market..
 - c Both agents report a severe shortage of immediate and future available land for strategic logistics. In particular, Bidwells suggest that there is only 1 month supply sufficient to accommodate recent historic take-up. Savills report that there is around 18 months of available supply against the take-up recorded by their data. In any case, both these figure point to an immediate need for additional employment land across the area.

5.0 Assessment of Industrial and Logistics Requirements

5.1 This section initially identifies the appropriate extent of the market for strategic logistics operators in relation to Greater Cambridge. Then, a thorough assessment comparable (as far as possible) to the Councils' evidence is presented highlighting the significant gap in the evidence underpinning the emerging Greater Cambridge Local Plan.

5.2 The analysis aligns with NPPF and PPG and in particular the guidance in Paragraph 031 which presents the approach on [‘How can authorities assess need and allocate space for logistics?’](#).

The Extent of the Market

5.3 The requirements considered in the 2020 ELEDES focus on employment space needs arising within Greater Cambridge based on forecast growth of employment and completions of space for the two local authority areas.

5.4 However, there is an inherent limitation to this approach, since functioning property markets (together with the business needs arising from these) typically operate across local authority boundaries. Accordingly, the PPG identifies that:

“Functional economic market areas can overlap several administrative areas so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area.”¹⁶

5.5 This is particularly the case for logistics activities which occupy storage and distribution premises, as the PPG acknowledges:

“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).”¹⁷

5.6 This reflects NPPF Paragraph 83, which states that planning policies and decisions should recognise and address the specific locational requirements of different sectors, including “storage and distribution operations at a variety of scales and in suitably accessible locations”.

5.7 The PPG goes on to emphasise that, “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 should be informed by:

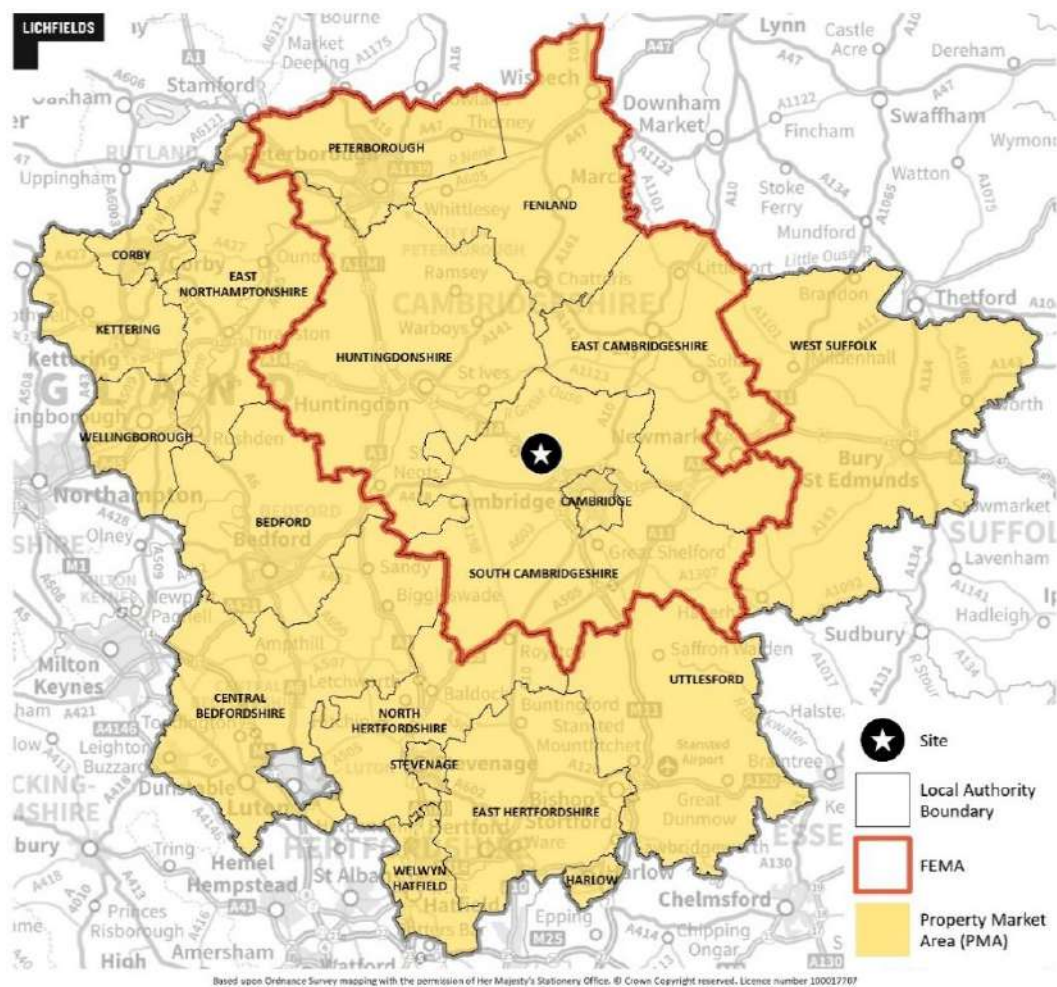
- engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
- analysis of market signals, including trends in take up and the availability of logistics 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.

¹⁶ Paragraph: 025 Reference ID: 2a-025-20190220

¹⁷ Paragraph: 031 Reference ID: 2a-031-20190722

- 5.8 The PPG is clear that, only once this evidence has been compiled, “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).”¹⁸
- 5.9 Based on our review of the 2020 ELEDES, and the Councils’ wider evidence base, we see no evidence that such an assessment has been undertaken, either to establish the scale of needs across the market area, nor to objectively understand the most appropriate locations for meeting these needs.
- 5.10 In the context of this omission, in consultation with Savills and Bidwells, we have sought to identify the extent of the logistics property market area (PMA) in which Greater Cambridge is located. The agents have indicated that the market relevant to Greater Cambridge is framed by the M11, A14 and A1 transport and freight corridors across the area (see paragraphs 4.7 to 4.14).
- 5.11 As a result, the PMA extends beyond the identified FEMA¹⁹ referred to in the ELEDES (but based on earlier 2016 analysis for a different purpose) to parts of Northamptonshire and Bedfordshire in the west, Hertfordshire and Essex to the south and Suffolk to the east. This PMA is shown in Figure 5.1, in the context of the FEMA referred to in the ELEDES.

Figure 5.1 Logistics Property Market Area



¹⁸ Paragraph: 031 Reference ID: 2a-031-20190722

¹⁹ Cambridge and Peterborough Authorities’ Statutory Governance Review (2016), Paragraphs 57 to 69, available at: [devolution-proposal-governance-review.pdf \(cambridge.gov.uk\)](https://www.cambridge.gov.uk/devolution-proposal-governance-review.pdf)

- 5.12 It should be highlighted that the Councils' employment evidence does not seek to provide a fresh appraisal of the FEMA, and fails to consider or test whether different areas would be appropriate for the purposes of understanding employment and business needs within different market segments.

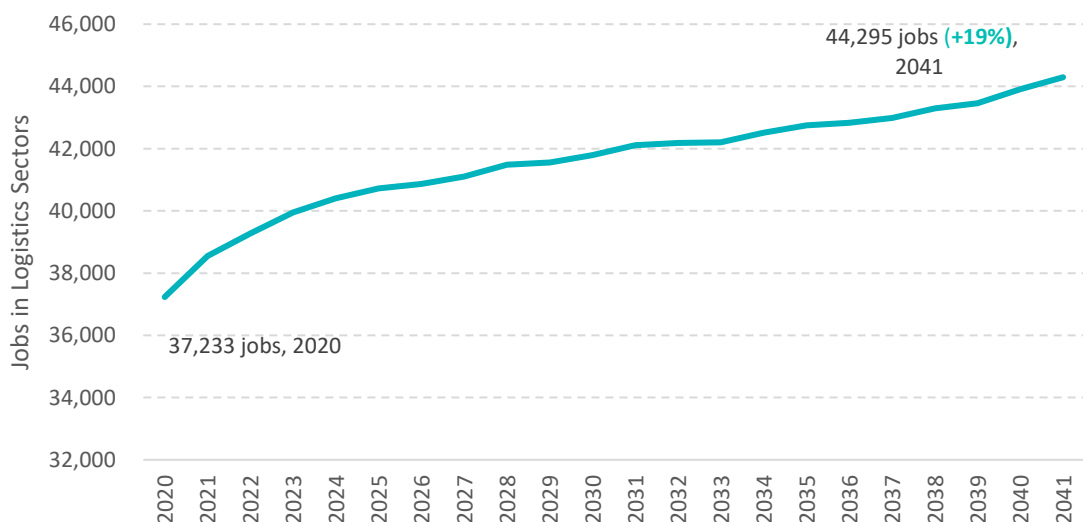
Logistics Need Assessment Update

- 5.13 We have analysed the latest Experian 2021 (September release) economic forecasts for FEMA and PMA across the 2020-2041 Plan period.

Logistics Need across the FEMA

- 5.14 Figure 5.2 summarises the forecast jobs growth in the storage and distribution-based sectors across FEMA over the Plan period. A total of 7,060 additional workforce jobs in logistics are forecast to be generated in the FEMA across the Plan period. To put in context, the total jobs growth expected across all sectors equates to 80,200 of which 33,440 jobs will relate to either office, industrial or distribution sectors.

Figure 5.2 Logistics Jobs Growth across FEMA, 2020 to 2041



Source: Experian (2021) / Lichfields analysis

- 5.15 The warehousing component of these employment growth forecast is converted to future employment space and land requirements in line with ELEDES. On this basis, a density of 1 workforce job per 70 sq.m and a plot ratio of 0.4 has been applied to convert employment jobs to net employment space and land requirements. In addition, a vacancy rate of 7.5%, in line with the ELEDES has also informed the employment requirements.
- 5.16 As a result, the net requirements²⁰ for storage and distribution uses across the FEMA equates to **533,880 sq.m (133 ha) or 25,420 sq.m per annum.**
- 5.17 Considering a past-trends scenario (i.e. as per the approach adopted in 2020 ELEDES), the storage and distribution net requirements across the FEMA are **545,500 sq.m (136 ha)**, which is similar to those expected by the economic forecasts. This is based on an average net

²⁰ Including a vacancy rate of 8%

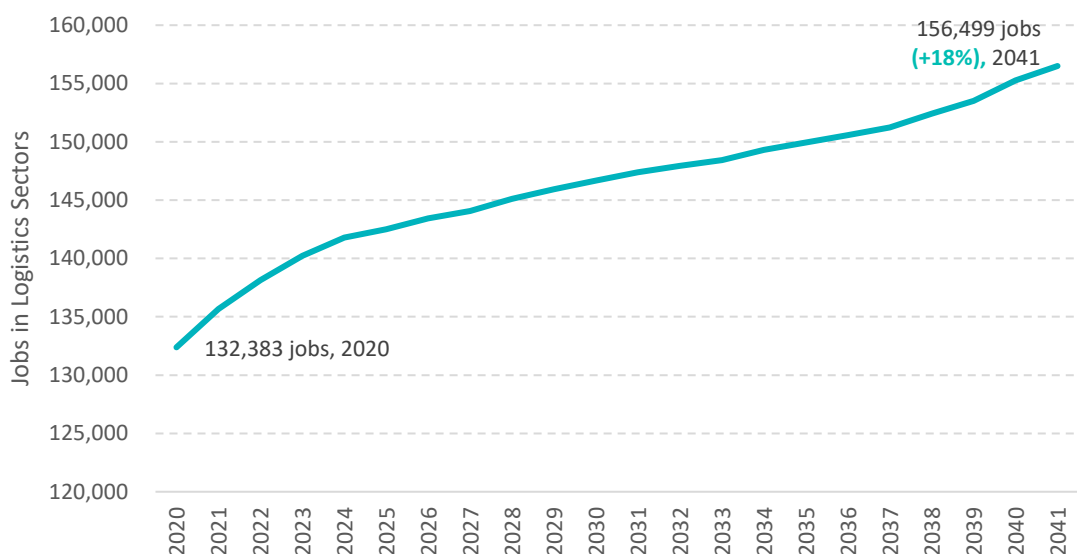
completion for storage and distribution (within B8 Class) of 24,050 sq.m per annum across all the FEMA authorities over the period of 2002 and 2016²¹.

- 5.18 To allow comparison with the ELEDES, these requirements are estimated in net terms, without including allowances for flexibility and losses. However, the actual planning requirements for B8 will likely be higher once these allowances are included.
- 5.19 In particular, the gross employment requirements across the FEMA would potentially include at least 2 years of net completions rates for B8 schemes (i.e. +48,100 sqm²²) and a loss allowance of 50,000 sq.m (est.) based on Councils' monitoring data to provide for flexibility and losses. Combined with the past take up growth scenario, this results in a gross requirement for storage and distribution space across the FEMA of **643,560 sq.m or 160.9 ha during the Plan period.**

Logistics Need across the PMA

- 5.20 An additional 24,116 jobs in logistics sectors are expected to be generated across the PMA based on Experian forecast. These represent a growth of 18% across the Plan period to 2041. To contextualise the analysis, the overall workforce jobs across all sectors will be 210,000 (+15%), of which 81,632 jobs will be generated in office, industrial and logistics sectors (i.e. employment-based sectors). Therefore, it is expected that 30% of the additional jobs in employment-based sectors across the PMA will relate to logistics.

Figure 5.3 Logistics Jobs Growth across PMA, 2020 to 2041

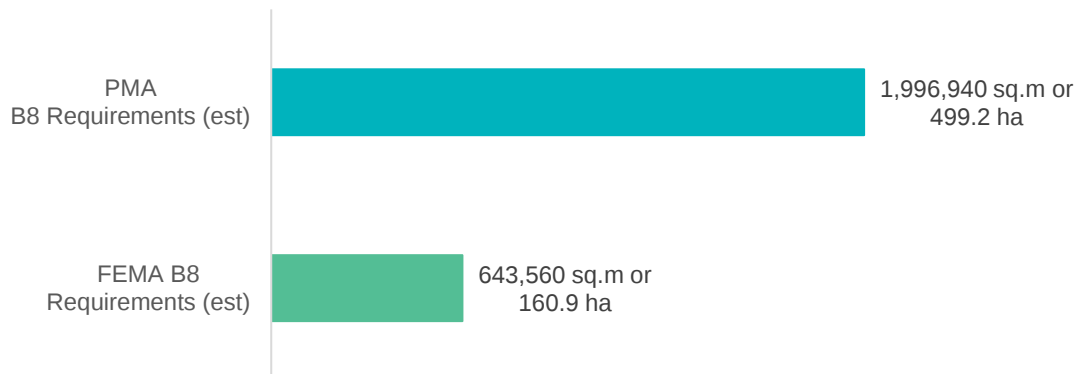


- 5.21 Applying the same approach as explained in paragraph 5.15 results in an additional employment net requirement for B8 Class of **1,823,160 sq.m (456 ha) or 86,820 sq.m per annum.** The gross employment requirements across the PMA will include at least 2 years of net completions rates for strategic B8 schemes (i.e. +72,520 sq.m) and a loss allowance of c. 101,000 sq.m reflecting the net losses occurred over the last ten years across the market based on CoStar demolitions and completions data between 2011 and 2021. This results in a gross requirement for storage and distribution space across the PMA of **1,996,940 sq.m or 499.2 ha during the Plan period.** It should be highlighted that this includes the FEMA requirements of 160.9 ha as identified above.

²¹ With the exception of Peterborough, where monitoring data is available between 2007/08 and 2012/13, and a pro-rated trend was included

²² Data available across all the FEMA authorities between 2002 and 2016.

Figure 5.4 Estimated B8 Gross Requirements by Geography, 2021-2041 (sq.m)



*including a vacancy rate of 7.5% according to ELEDES, Table 40 pg.114

Source: Councils' monitoring data, CoStar (2021) / Lichfields analysis

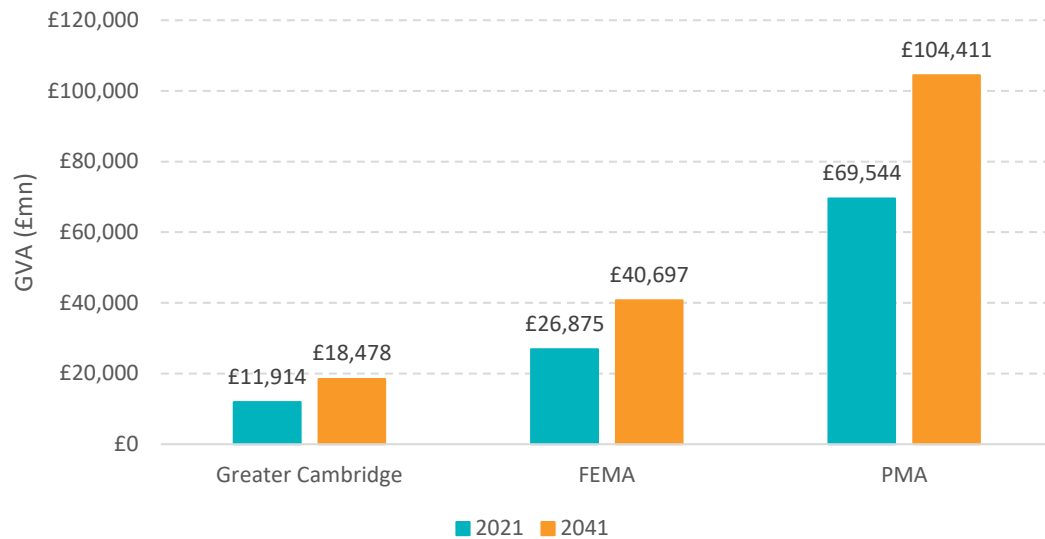
- 5.22 The 2020 ELEDES contains no assessment of the wider FEMA and PMA needs, contrary to the PPG, and provides no consideration of the extent to which these needs can be accommodated that would be expected to form the basis of meaningful engagement with neighbouring local authorities in this regard.
- 5.23 We also note that studies of strategic distribution needs undertaken in other parts of the country also typically consider other approaches to estimating strategic logistics requirements. For example, the Leicester and Leicestershire Strategic Distribution Study (2021), also prepared by GL Hearn with MDS Transmodal and Icen Projects, produces estimates based on forecast growth of freight and the replacement of out-of-date stock. The latter is based on a 30-year 'warehousing life circle' assumption.
- 5.24 Considering the fact that around 190 warehousing premises or 56% of the existing warehousing premises across Greater Cambridge were constructed prior to 1991, with just 9% being constructed post 2010²³, if a similar approach were to be applied the anticipated replacement rate will be high and potentially it will exceed the demand scenarios estimated above. We see no consideration of such an approach within the ELEDES.

Greater Cambridge Contribution

- 5.25 As it stands, the recommended B8 land requirement identified in the 2020 ELEDES (Table 39, pg.113) of 46,930 sq.m amounts to **only 7%** of the gross requirement for storage and distribution land identified in the FEMA, and **just 2%** of needs arising across the wider logistics PMA in which Greater Cambridge is situated.
- 5.26 This is notwithstanding that Greater Cambridge's economy is the strongest across the area. In particular, Greater Cambridge's GVA at £11.9 billion in 2021 represented 44.3% of the FEMA's GVA and 17.1% of the PMA equivalent as presented in the graph below. These shares are expected to increase to 45.4% and 17.7% in 2041, respectively.

²³ Based on CoStar records (November 2021)

Figure 5.5 Economic Output (i.e. Gross Value Added (GVA)) in 2021 and 2041

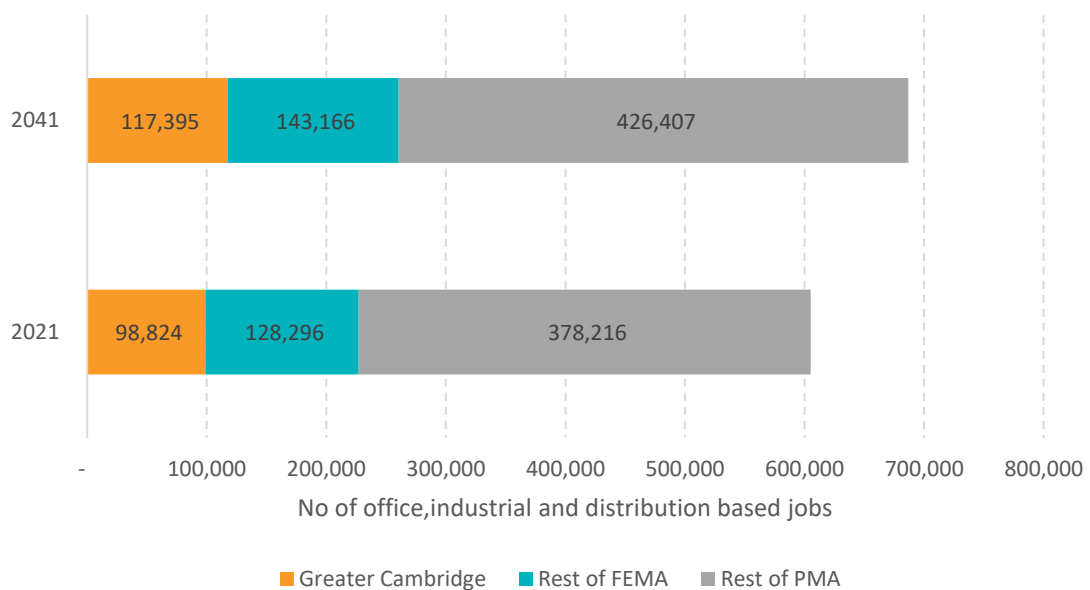


Source: Experian (2021) / Lichfields analysis

5.27 Moreover, in terms of employment (i.e. workforce jobs' representation), Greater Cambridge with a total of 221,300 jobs across all sectors represents 42.9% of FEMA's and 16.0% of PMA's equivalents in 2021. These shares are forecast to increase to 43.9% and 16.4% in 2041, respectively.

5.28 We have also analysed the equivalents in terms of office, industrial and distribution-based GVA and employment and these result in similar representation levels. In particular, in terms of employment in office, industrial and distribution sectors Greater Cambridge represented 43.5% of the FEMA's and 16.5% of the PMA's equivalents in 2021 and these are forecast to increase to 45.1% and 17.1% in 2041, respectively (Figure 5.6).

Figure 5.6 Office-, Industrial- and Distribution-based Jobs in 2021 and 2041



Source: Experian (2021) / Lichfields analysis

- 5.29 In terms of GVA generated in 2021 in office, industrial and distribution sectors, these were 42% of the FEMA's GVA and 16% of the PMA's equivalent in 2021. Based on Experian, these will increase to 43.1% and 16.7% in 2041, respectively. Finally, it should be noted that an exclusive analysis of B8 employment and GVA is not considered representative, simply due to the fact that the sector is underrepresented across the area.
- 5.30 As presented above the latest Experian forecasts suggest that the share of Greater Cambridge's employment and GVA will be increased by 1% to 2% in 2041, which means that Greater Cambridge's economy will grow proportionately higher than the rest of the FEMA and PMA.
- 5.31 Therefore, on a proportionate basis, the strategic distribution requirements that should be accommodated by Greater Cambridge to reflect the economy's dynamics should be between **276,000 sq.m and 342,000 sq.m or 69.0 ha and 85.5 ha²⁴.**

Summary

- 5.32 This section presents an updated logistics need assessment across the property market area in relation to Greater Cambridge. We summarise below the key points:
- a In line with PPG Para 31 and in collaboration with Savills and Bidwells, we have considered the extent of the appropriate property market area, which is defined as the area extend beyond the previously identified FEMA to parts of Northamptonshire and Bedfordshire in the west, Hertfordshire and Essex to the south and Suffolk to the east.
 - b Based on recent economic forecast produced by Experian the net requirements for storage and distribution uses across the FEMA equates to 533,880 sq.m (133 ha) or 25,420 sq.m per annum. Considering also a past-trends scenario as per the approach adopted in 2020 ELEDES, the storage and distribution net requirements across the FEMA are 545,500 sq.m (136 ha). Once the appropriate levels of flexibility and loss replacement allowances are applied, the gross employment requirements across the FEMA equates to 643,560 sq.m or 160.9 ha during the Plan period.
 - c Based on the economic forecasts the net requirement for B8 Class across the PMA totals 1,823,160 sq.m (456 ha) or 86,820 sq.m per annum. The gross employment requirements once we consider the appropriate levels of allowances results on a total of 1,996,940 sq.m or 499.2 ha across the PMA during the Plan period. This includes the FEMA requirements of 160.9 ha.
 - d On a proportionate basis and reflecting Greater Cambridge's economic performance and growth potential against the FEMA and the PMA, we have identified that Greater Cambridge's contribution to those needs equates to a need between 276,000 sq.m and 342,000 sq.m or 69.0 ha and 85.5 ha.

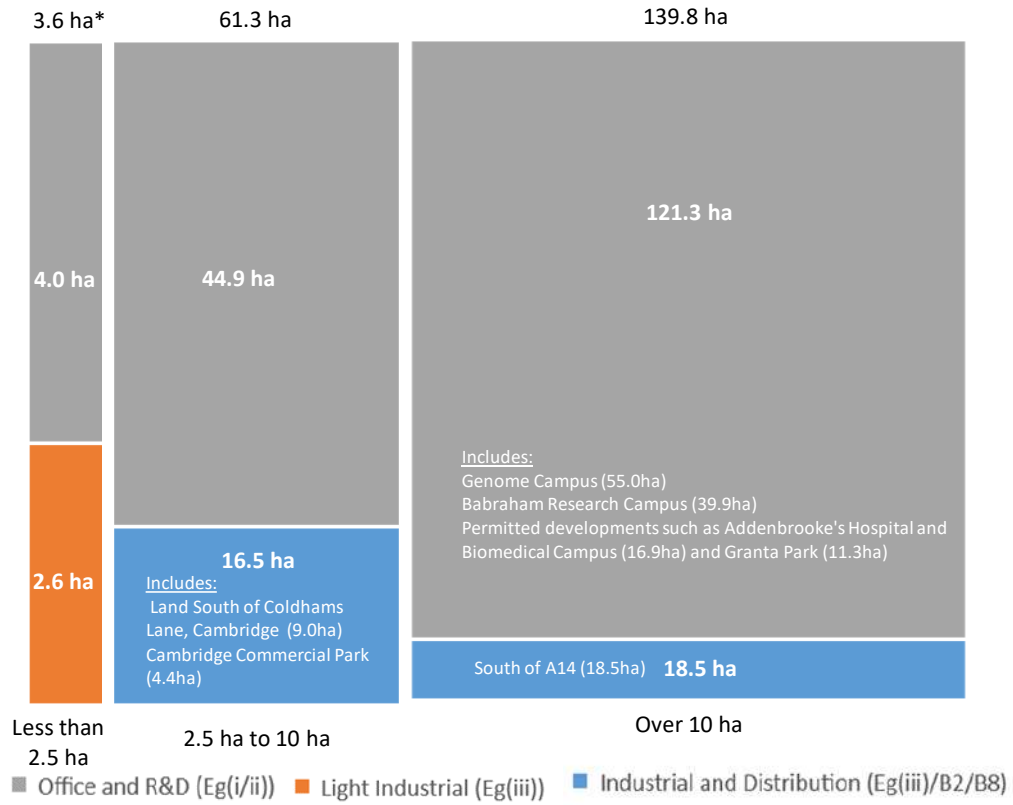
²⁴ These represents the lowest and the higher edge of the range in terms of both GVA and employment representation.

6.0 Adequacy of Current and Emerging Industrial Supply

- 6.1 Having established that the future needs for storage and distribution uses in Greater Cambridge are likely to be significantly higher than has been estimated by the Councils' evidence, we now turn to analyse the proposed employment supply in Greater Cambridge and its adequacy to accommodate future logistics requirements. The analysis draws on data from various resources, including:
- The consultation draft '[Greater Cambridge Local Plan First Proposals](#)';
 - [Cambridge Local Plan](#) 2018 (adopted);
 - [South Cambridgeshire Local Plan](#) 2018 (adopted);
 - Draft [North East Cambridge Area Action Plan](#) 2020;
 - [Northstowe Area Action Plan](#) 2007 (adopted);
 - The 2020 Greater Cambridge Employment Land and Economic Development Evidence Study; and
 - the [planning permissions database for Greater Cambridge](#).
- 6.2 Drawing these together, there is estimated to be a total of 204.8 ha²⁵ of employment supply, including land for office, research and development (R&D), light industrial, general industrial and distribution uses.
- 6.3 This comprises around 32.0 ha of permitted employment developments and 172.8 ha of allocations mainly as part of residential-led mixed-use sites or expansions of existing business campuses. Most of the residential-led allocations propose to provide employment space in relation to retail and town centre/service-based economy uses, while the employment allocations relate mainly to university-based and R&D sectors.
- 6.4 Therefore, the vast majority of the supply (83.1%) relates to sites permitted or allocated for office and R&D operations, with just 16.9% identified for light industrial, industrial and distribution uses. This is illustrated in Figure 6.1 overleaf, which summarises the employment supply position by type and size.
- 6.5 In terms of general industrial, light industrial and storage and distribution uses, there is a total supply of 34.6 ha comprising -6.6 ha of permitted schemes (i.e. sites on which there will be net losses of floorspace) and 41.2 ha of smaller site allocations that could potentially provide for such uses.

²⁵ A plot ratio of 1.0 was applied to convert Eg(i/ii) permitted or proposed space to land equivalents (ha) when land information was not available. Similarly, a plot ratio of 0.4 was applied for industrial and distribution uses. These reflect the approach adopted by the Councils evidence.

Figure 6.1 Employment Supply Position in Greater Cambridge by Type and Size



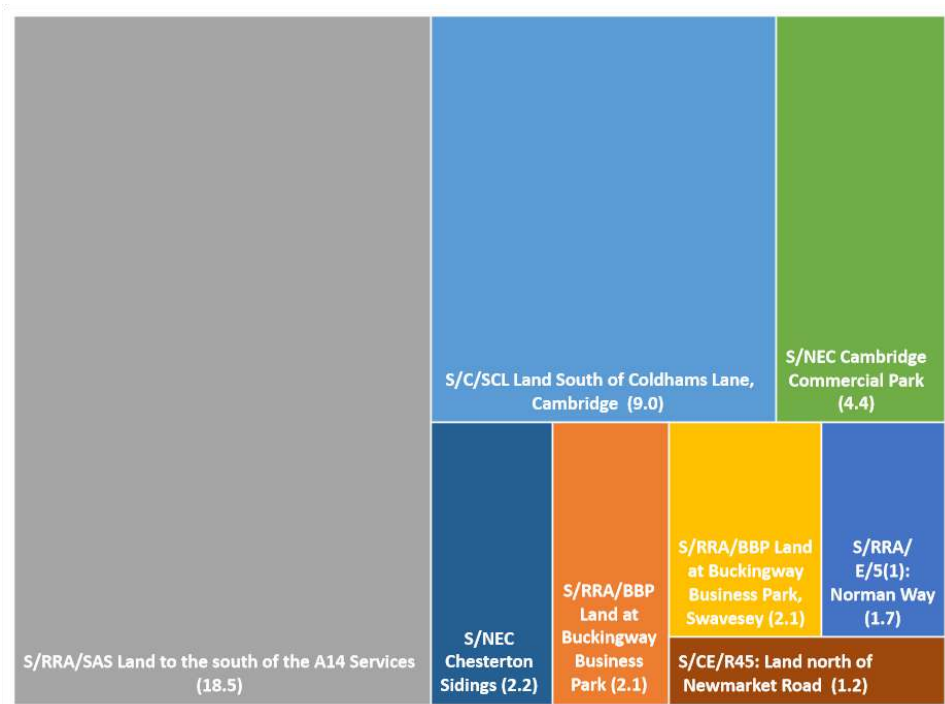
* including loss of industrial and distribution space of 3.0ha

Source: Greater Cambridge (2021), GLH (2020) / Lichfields analysis

6.6

In particular, there are eight site allocations that could provide for industrial and distribution operations, as presented in Figure 6.2 overleaf, of which five are considered too small (being less than 2.5 ha) to accommodate a development above 9,300 sq.m (i.e. the threshold for strategic distribution units). On this basis, these five sites are not considered suitable for strategic B8.

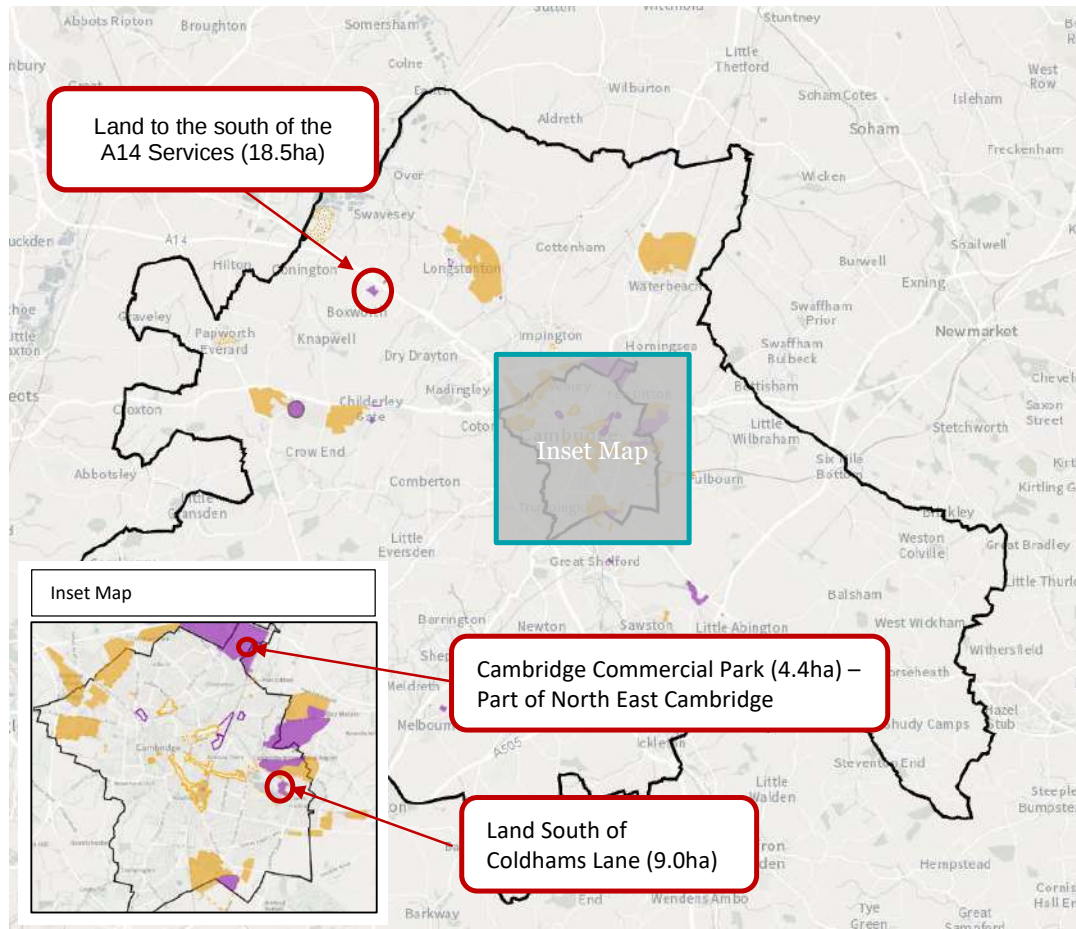
Figure 6.2 Employment Supply for Light Industrial, Industrial and Distribution Space in Greater Cambridge by Site



Source: Greater Cambridge (2021), GLH (2020) / Lichfields analysis

6.7 On this basis, there are three remaining sites which vary in size between 4.4 ha and 18.5 ha that could potentially accommodate strategic distribution needs. These are identified in Figure 6.3 and are discussed in more detail below.

Figure 6.3 Proposed Policies Map – Location of Industrial Sites over 2.5 ha



Source: Greater Cambridge Local Plan – [ArcGIS Web Application](#)

- 6.8 Based on the proposed Policy/RRA/SAS the site at **Land to the south of the A14 Services** is suitable for industrial or storage and distribution uses and is proposed to provide a range of small and medium-sized units. It is stated in particular that, “*warehousing and distribution should focus on meeting sub regional needs, therefore, the site should provide a mix of small to medium sized units*”. It is also suggested that the site will meet the “*outstanding demand for warehousing and distribution units located close to the strategic road network*”.
- 6.9 Then, the proposed policy lists a variety of design requirements including a minimum of 25m wide ‘landscape buffer’ of native tree and understorey planting and suggests that the density of development should reflect the density and pattern of non-residential development in the nearby village of Boxworth (i.e. small to medium sized units). Considering all these constraints, the actual developable area is much smaller, estimated at approximately 14 ha. In any event, the policy direction relates to small and medium scale development.
- 6.10 The proposed Policy S/LAC allocates 9.0 ha on **Land South of Coldhams Lane, Cambridge** (site ref: S/C/SCL), which is considered “*suitable for commercial development such as relocation of ‘space intensive’ uses such as builders’ merchants sales and storage facilities which are currently located on land elsewhere in the city*”. The policy states that this site is suitable also for last mile logistics operations. The 2020 ELEDES states that the vacant area at the site is 7.9 ha and it recommends it for providing “*light industrial and potentially a wider mix of employment uses that may be displaced from other city employment sites*”.

- 6.11 Part of the site comprises a former landfill and any development will require significant ecological enhancements together with the provision of open space on the western part of the landfill sites (policy requirement) that would potentially impact on its deliverability and market attractiveness.
- 6.12 Notwithstanding these constraints, it is understood that there has already been a high interest for the site. Bidwells state that a local developer has submitted proposals to develop a 350,000 sq ft last mile delivery and distribution scheme as part of a larger scheme which will also create an ecology park and an urban country park at Cherry Hinton Lakes. It was also reported that the developer confirmed they are in discussions with future occupiers for approximately 60% of the scheme's capacity (in September 2021) given it's the only option for occupiers within the City. On this basis, the site is not considered available to accommodate future needs as it will potentially be taken up prior to the adoption of the Local Plan.
- 6.13 Finally, the proposed Policy S/NEC aims to create a new 'city district' at **North East Cambridge**. The Council is also preparing an Area Action Plan (AAP) that will provide the Spatial Framework for its development (consulted in Autumn 2020). According to the AAP, the Cambridge Commercial Park site will provide up to 17,500 sq.m of new industrial, storage and distribution space alongside the reprovision of existing industrial floorspace. Chesterton Sidings will also provide 8,800 sq.m of new industrial and distribution space, but this relates to a site of less than 2.5ha. In terms of business space, the rest of the allocation focuses on office and R&D developments.
- 6.14 Most of the proposed allocation is currently occupied, and it is not clear if the redevelopment will commence within the plan period considering landholding issues. This is also demonstrated by the fact that the proposed Policy S/NEC states that the site will be fully developed beyond the Local Plan period of 2041. Therefore, the actual capacity of the site within the Plan period is not defined.
- 6.15 Synthesising the above, the effective developable, available and suitable supply for industrial and distribution uses in Greater Cambridge to 2041 totals just **14 ha** which could potentially accommodate up to 56,000 sq.m²⁶ floorspace. ***This is located on just one site (i.e. land to the South of the A14).***

Supply across the Wider Market

- 6.16 We have also reviewed the various adopted and emerging Local Plans across the FEMA and the logistics PMA, alongside the pipeline and ongoing development activity to identify the supply position across the market. The analysis was triangulated with market data and the views of Savills and Bidwells on the availability, deliverability and suitability of different sites for strategic distribution operations.
- 6.17 There are currently 25 warehouse premises across the PMA which are either under construction or refurbishment totalling 665,800 sq.m²⁷. These are estimated to be delivered within the next three years, thereby comprising part of the future availability. Five of these totalling 123,000 sq.m are located within the FEMA, although none are within Greater Cambridge.
- 6.18 There are also an additional 11 existing warehouses totalling 309,000 sq.m currently advertised as available across the PMA (at November 2021). These are concentrated in Central Bedfordshire, Wellingborough and Peterborough and comprise the market's only immediate availability.

²⁶ Based on average plot ratio of 0.4

²⁷ CoStar (November 2021)

- 6.19 Across the PMA there is also a total of 432.0 ha allocated for employment²⁸ (including the 14ha identified in Greater Cambridge) that could accommodate strategic B8 uses, subject to each site's location and context. Around 111.0 ha of these allocations are within the FEMA and mainly located in Peterborough (40%).
- 6.20 It is important to note that both the Greater Cambridge FEMA and wider logistics PMA also have a significant demand for large industrial (within B2 Use Class) units. Bidwells' market report suggests that there is a current requirement for B2 occupiers with interest in locating within Greater Cambridge of **3.12 million sq ft (290,000 sq.m)**. Moreover, much of the supply across the FEMA and PMA relates to strategic mixed-use allocations including housing, which could constrain further the capacity for B8 developments in those areas.
- 6.21 Considering the above, together with reviewing each site's characteristics and the associated policy requirements, the analysis triangulated by the commercial agents' feedback has concluded that a total of 180 ha across the PMA (with a potential capacity of 539,000 sq.m) could be considered available, suitable and deliverable for strategic B8 in longer term. This represents 41.6% of the total employment allocations across the PMA.
- 6.22 Across the FEMA, the agents suggest that all the allocated sites that could be suitable for strategic distribution uses have granted permission. In particular, proposals in Red Brick Farm in Peterborough (Policy LP44 & LP45 of the Peterborough Local Plan) have been subject to an outline planning permission for employment uses. Based on the masterplan proposals the site will mainly provide for small to medium units with limited capacity for units of 9,300 sq. m or over due to permitted height parameters according to Savills. No other allocation site (with no associated planning permission) has been identified as suitable, available or deliverable for strategic distribution uses across the FEMA based on the adopted and emerging policy frameworks.
- 6.23 Of note, the 14ha in Land to the south of the A14 Services in Greater Cambridge has not been included in this figure, as the agents have concluded – in line with emerging policy – that the site will only deliver small and medium scale units. However, the analysis of supply and demand position across Greater Cambridge, which is presented in Section 7.0 below, does include the provision of Land to the south of the A14 Services within the B8 supply position.

Summary

- 6.24 This section reviews the emerging supply position across Greater Cambridge, the FEMA and PMA. The key findings include:
- a The effective developable, available and suitable supply for strategic industrial and distribution uses in Greater Cambridge to 2041 totals just 14 ha which could potentially accommodate up to 56,000 sq.m floorspace. This is located on just one site namely the Land to the South of the A14 proposed allocation. Of note, the agents have not considered that this site could accommodate strategic B8 or B2 due to the proposed policy for small to medium sized units.
 - b There is no capacity for strategic distribution units across the FEMA based on the current and emerging employment pipeline position.
 - c There is a total of 180 ha across the PMA with a potential capacity of 539,000 sq.m that could be considered available, suitable and deliverable for strategic B8 and B2 in longer term.

²⁸ Proposals for B-mixed and office uses above 2.5ha

7.0 Demand and Supply Balance

- 7.1 This section considers the identified supply against the arising strategic logistics need across Greater Cambridge.
- 7.2 As identified in Section 5.0, the strategic distribution requirements that should be accommodated by Greater Cambridge to reflect the economy's dynamics should be between 276,000 sq.m and 342,000 sq.m or 69.0 ha and 85.5 ha. Considering the supply position in Greater Cambridge (i.e. 14ha), this results in a **shortfall of strategic logistics land of 55.0 ha to 71.5 ha across the Plan period.**
- 7.3 This shortfall is expected to increase further if we consider the additional regional demand derived particularly from the area's proximity to Felixstowe and the fact that Cambridge is a key centre across the A14 Felixstowe to Midlands Freight Corridor identified by National Highways. Commercial agents report that locations easily accessible to inbound ports are increasingly in demand as distributors seek to maximise efficiencies and mitigate against future supply chain disruption. Of note, Felixstowe handled 23.08 million tonnes of cargo in 2021²⁹ of which 68% relates to inbound volumes that are distributed to the rest of the UK via the A14. The agents have highlighted the importance of Felixstowe's dynamics and influence across Greater Cambridge's market which is expected to increase further.
- 7.4 There also other factors that indicate need for the provision of additional employment land across Greater Cambridge. Firstly, the Councils should recognise that there is a requirement for larger scale general industrial units (falling within B2 Class) in the area attracted by the advanced manufacturing and bio-science activity in Cambridge³⁰. Moreover, the market reports that there are existing occupiers in Greater Cambridge that have been seeking sites and buildings to expand their existing businesses. However, due to the lack of available employment land to accommodate sizable buildings in the area, these occupiers have restrained their growth aspirations or been forced to consider moving away from Greater Cambridge. According to the agents there is currently demand of 3.12 million sq ft (i.e. 290,000 sq.m) for manufacturing and general industrial large-scale buildings based on live enquiries.
- 7.5 Contrary, the Cambridge Local Plan (adopted in 2018) proposes the de-designation of employment sites in the City for housing redevelopment. Research by Bidwells suggests that a total of 1.3 million sq ft (i.e. 120,000 sq.m) of existing employment space will be displaced from the City, of which around 40% has already either redeveloped or permitted. It is understood that the emerging Local Plan for Greater Cambridge inherits the same approach and not only proposes the same de-designations (as in the adopted plan), but there are also new allocations with existing industrial businesses for redevelopment to housing-led schemes (i.e. sites in North East Cambridge). This would further increase the industrial requirement across the area and add pressures to allocate more employment land.
- 7.6 Furthermore, the population across Greater Cambridge will increase significantly across the Plan period. There will be an additional 44,000 new homes in Greater Cambridge by 2041, which relates to a population increase of 101,000 people. This increase impacts on demand for both strategic logistics and last mile operations in Greater Cambridge. These should be accommodated in accessible locations in close proximity to population centres in line with the recently introduced [Net Zero Strategy: Build Back Greener](#) and the requirements to minimise

²⁹ Port Freight Statistics Dashboard, available at <https://maps.dft.gov.uk/port-freight-statistics/interactive-dashboard/index.html>

³⁰ Businesses such as CMR Surgical had been actively looking for a unit of over 100,000 sq ft anywhere in proximity to Cambridge for a long period and they had to eventually take-up a unit of 75,000 sq ft in Ely, compromising their growth plans.

emissions. There is particular reference to last mile deliveries with zero emission vehicles or more sustainable delivery methods, which would require proximity to key conurbations.

- 7.7 Finally, it should be highlighted that there is a clear market signal indicating current, latent, demand for strategic distribution developments across Greater Cambridge and the PMA. The live inquiries as at October 2021 average above 260,000 (sq.m) or over 65ha³¹. This is mainly a result of the recent increase in e-commerce combined with the historic under-provision of strategic logistics units across the area.

Summary

- 7.8 Synthesising the above, more employment land is clearly required to secure the economic potential of Greater Cambridge and to provide new space to accommodate the need for 'supporting' sectors of the economy including logistics.
- 7.9 The current scale of land identified in the emerging Local Plan for such uses is clearly inadequate to accommodate future needs, which have been significantly understated in the evidence available to the Councils, and thereby jeopardises the economic potential of the area. Furthermore, the requirements of the NPPF and PPG have not been complied with in this regard.
- 7.10 Overall, by our estimates there is at least a shortfall between 55.0 ha and 71.5 ha that should be accommodated in Greater Cambridge across the Plan period.

31 Based on 0.4 plot ratio

8.0 Conclusions

- 8.1 This study examines the need for additional employment land supply to meet the strategic storage and distribution need arising in Greater Cambridge. It has been undertaken in the context of promoting J25 Bar Hill for a major leading-edge sustainable employment park development on the edge of the City.

Councils' Existing Evidence

- 8.2 In our view, the need for storage and distribution space has been effectively overlooked by the emerging Local Plan, counter to the NPPF's requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales, and the PPG's associated guidance in this regard. On this basis, this study has identified the lack of the evidential basis to robustly justify the emerging Policy J/NE *New employment and development* stating that large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge, which clearly undermines the soundness of the Plan as currently proposed.
- 8.3 On this basis, we recommend that Councils must therefore now seek to properly assess and have regard to the requirements for storage and distribution operations of all scales and in suitably accessible locations in line with NPPF, taking account of the relevant FEMA and PMA. This requires a full assessment of strategic distribution needs, and appraising all the available supply options to accommodate those needs, once identified. This is critical in order for the Local Plan to be compliant with NPPF (paras 32 and 83) and PPG on [Economic Need](#) (para 31).

Property Market Assessment

- 8.4 Bidwells and Savills have provided detailed market assessments to support this representation. These indicate that at a national level, the strategic logistics and industrial market has seen record levels of demand, particularly over the last 18 to 24 months when there has been a significant increase in on-line sales and associated space needs.
- 8.5 Both the agents define the strategic logistics market in relation to Greater Cambridge crossing the areas around A1(M), A14 and M11. Although Savills highlights the importance of ports as key players in locational decisions, Felixstowe has not been considered as part of the wider market. In contrast, Bidwells has considered that the port impacts the entire market across A14 including Cambridge and on this basis, they include East Suffolk within the wider market.
- 8.6 Both agents report a severe shortage of immediate and future available land for strategic logistics. In particular, Bidwells suggest that there is only 1 month's supply sufficient to accommodate recent historic take-up. Savills report that there is around 18 months of available supply against the take-up recorded by their data. In any case, both these figure point to an immediate need for additional employment land across the area.

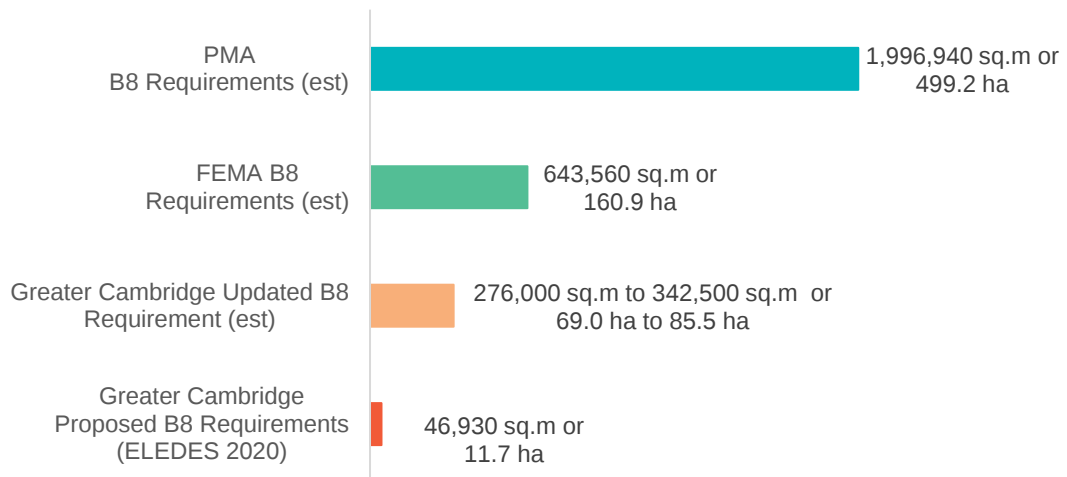
Strategic Logistics Need Assessment Update

- 8.7 In the current absence of available evidence by the Councils, and in view of the market feedback, Lichfields has reviewed the existing evidence base and undertaken analysis of strategic distribution needs in line with PPG. In particular, the findings drawn on recent post pandemic econometric forecasts produced by Experian together with considering the most recent development rates monitored by the Councils.
- 8.8 The analysis indicates that the appropriate scale of storage and distribution requirements arising in Greater Cambridge as part of the requirement identified across the relevant strategic

logistics PMA, which extends beyond the identified FEMA to parts of Northamptonshire, Bedfordshire, Hertfordshire, Essex and Suffolk, is estimated to be between 69.0 ha and 85.5 ha. This range reflects patterns of economic activity and employment representation across the market. As presented below this need is at least 500% to 630% above the proposed B8 requirements estimated by the 2020 ELEDES.

- 8.9 Figure 8.1 summarises the findings of the need assessment and compares these with the identified need for distribution space in the 2020 ELEDES.

Figure 8.1 Summary of Strategic Distribution Need across the different study areas



Source: Lichfields analysis

Demand and Supply Position

- 8.10 Having scrutinised the identified supply across Greater Cambridge, there is evidently only one site of 14ha that can be genuinely be regarded as suitable and available to accommodate strategic distribution uses. This represents just 2.8% of the requirement identified across the PMA, 8.7% of the FEMA's equivalent and 16%-20% of the need identified in Greater Cambridge itself. Synthesising the analysis, there is a shortfall of storage and distribution employment land in Greater Cambridge between **55.0 ha and 71.5 ha** across the Plan period to 2041.
- 8.11 This shortfall must to some extent be accommodated within Greater Cambridge rather than those areas that have historically been relied upon to accommodate logistics need across the PMA (such as Peterborough and Northamptonshire) to avoid compromising the functioning of Cambridge's economy and to avoid a sub-optimal distribution network resulting in longer journeys by road and higher vehicle emissions.
- 8.12 Synthesising the above, there is need to increase the employment supply across Greater Cambridge by **allocating additional land of up to 71.5 ha** which is suitable, available and deliverable across the Plan period to 2041.

The Councils' Interpretation of the Evidence

- 8.13 Based on the 2020 ELEDES and the [Jobs Topic Paper](#), the proposed Policy J/NE *New employment and development proposals* in the Greater Cambridge Local Plan – First Proposals consultation draft states that employment development will be supported in the Plan's allocations, within town centres, close but outside to settlement boundaries of villages subject to a number of criteria, in established employment areas and in countryside only where the

expansion of existing businesses fulfils a number of criteria. Most importantly, the Policy states that:

“Large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge”.

8.14 The justification for this is set out below³²:

“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 (as mentioned above)). 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 greenbelt location, it is proposed that the plan continues to not support large scale regional and national distribution proposals”.

8.15 In essence, whilst the Councils’ acknowledge that the area “*may be desirable to national distributors*”, only very limited justification is provided as to why these strategic needs should not be met. It is therefore, effectively, a continuation of the approach contained in Policy E/11: Large Scale Warehousing and Distribution Centres of the South Cambridgeshire Local Plan 2018 (adopted). Moreover, the background to Policy J/NE set out in the Jobs Topic Paper does not refer to NPPF Paragraph 83 in the context of the need it identifies plan for strategic distribution needs.

8.16 In addition, under the alternatives considered to Policy J/NE³³, the only option considered is “No policy”. On this basis, we conclude that the Councils have no evidential basis upon which to demonstrate that they have fully appraised the policy choice of not providing for larger scale logistics against the alternative of meeting the logistics needs arising in Greater Cambridge and the wider area. This highlights a procedural failure relating to the Local Plan’s preparation and in particular the appraisal of the alternative options as part of the Plan’s Sustainability Appraisal. This needs to be addressed at the next stage of the Local Plan preparation (i.e. Regulation 19).

8.17 On a similar basis, due to the lack of robustness of the existing evidence, the Councils have not cooperated appropriately with the surrounding authorities and those comprising the FEMA and PMA to discuss the spatial distribution of employment land required to accommodate strategic needs. This is another critical failing that needs to be addressed at the Regulation 19 Stage.

8.18 We also note that, as part of the Local Plan preparation to date, a range of consultation feedback³⁴ on logistics was received particularly at the “First Conversation” stage. However, the Councils’ response does not deal with the feedback regarding the overall need for distribution space across the area, taking only a narrow view based on local employment needs.

8.19 Overall, the Councils’ evidence, and subsequently the emerging employment policies, do not take account of the employment land needs arising across the area, which according to both NPPF (Paragraphs 32 and 83) and PPG on Economic Need (Paragraph 31) should be assessed and accommodated within the plan-making process. This clearly undermines the overall soundness of the Local Plan, and is therefore contrary to the requirements of NPPF Paragraph 35 which requires plans to be “a) Positively prepared”, “b) Justified” and “d) Consistent with national policy”. In addition, the lack of robust evidence has resulted in fundamental flaws in respect of the Sustainability Appraisal and Duty to Cooperate.

³² GCLPFP Policy J/NE (pg. 230) and Topic Paper, (pg. 13 to 15)

³³ And set out in the SA Part 2 (pg. 321-322)

³⁴ Jobs Topic Paper, Appendix 1, pg.86

- 8.20 In this context, it is imperative that the Local Plan Regulation 19 Draft address these issues, by identifying the additional employment land requirements and making further allocations of available, suitable and developable land that can be delivered within the Plan period. The allocation of J25 Bar Hill is considered to be a highly suitable solution in this context.

Appendix 1 Bidwells Market Report

LAND AT J25, BAR HILL, CAMBRIDGE

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Appendix 1

MAP SHOWING EMPLOYMENT DISPLACEMENT IN CAMBRIDGE CITY

1.0 Executive Summary

- 1.1 The site at J25 Bar Hill extends to approximately 100 ha and could accommodate in excess of 3m sq ft of E(g), B2 & B8 commercial accommodation, together with alternative uses.

1.2 Market Context

- There is a severe shortage of good-quality industrial and logistics stock combined with limited deliverable land for development within Greater Cambridge (referred to as the immediate market) and the wider industrial and logistics market (referred to as the regional market);
- There are only two sites with outline planning consent for B2 & B8 uses currently available in Cambridge and a 20 mile radius for occupiers seeking space > 100,000 sq ft;
- There are currently no industrial buildings over 100,000 sq ft available in Cambridgeshire;
- Cambridge lags behind other major regional commercial centres such as Peterborough, Huntingdon, Bury St Edmunds and Ipswich in its stock of industrial units and the shortage fails to support forecasted economic growth;¹
- 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 Greater Cambridge, is likely to compromise future employment growth in the area;
- There is currently approximately 5.35m sq ft of live enquiries (as at December 2021) from occupiers specifically interested in being located in Greater Cambridge. In terms of planning use, this is broadly split as follows:

E(g) & B2: 3.12m sq ft;

B8: 2.23m sq ft.

- Demand may be suppressed by limited existing stock and is likely to increase in the future as a result of growing investment in the Oxford to Cambridge Arc;
- Nationally and locally, take-up of warehousing space has been at record levels for the past 18 – 24 months, despite new development being delivered;
- With the current levels of supply of buildings > 100,000 sq ft in the regional market (190,000 sq ft), there is remarkably less than one months' worth of supply at the current rate of take-up. As such, the identified requirement of only approximately 260,000 sq ft in Greater Cambridge until 2040² is woefully inadequate;
- Supply of industrial floor space in Cambridge fell to its lowest level in more than 20 years, with just over 208,000 sq ft on the market at the end of June 2021. This is a staggering vacancy rate of just 2.4%, highlighting the enduring shortage of accommodation;

¹ Source: Bidwells Research

² Source: Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) – GL Hearn.

- We have highlighted over 7.18m sq ft of active demand in the general area of J25 Bar Hill and along the A14 corridor. Focussing on Cambridge specifically, the demand for industrial floor space has risen to its highest levels in 14 years, with more than 36% of requirements for buildings of 50,000 sq ft and above;
- Many of these requirements would welcome the opportunity to establish themselves or have a facility close to Cambridge, but the lack of sites during the previous 10 years has restricted anyone seeking a facility of over 100,000 sq ft from accommodating themselves within the immediate Cambridge area. A good recent example of this is CMR Surgical who have had to take a 75,000 sq ft build-to-suit unit up at Lancaster Way Business Park, Ely;
- There is currently approximately 1.3m sq ft of demand for buildings above 100,000 sq ft from occupiers already located within Cambridge. These occupiers have been seeking sites/buildings to expand their business which have been thriving during the previous three to four years. However due to the lack of allocated employment land for sizable buildings they are being stifled in their growth aspirations and are being forced to consider land/sites away from Cambridge, taking with them highly skilled jobs and economic opportunity;
- The Greater Cambridge planning policy is focussed on the provision of new housing, with the local plans allocating a number of major existing industrial estates for future residential. A total of approximately 1.3m sq ft of occupied employment land in Cambridge City is allocated for residential development in the Cambridge Local Plan 2018, with further sites such as Dales Manor and Unity Campus in Sawston (Greater Cambridge) also allocated for alternative uses. Displacement of commercial occupiers has already begun, with 94,000 sq ft of industrial land being repurposed for residential or other uses, and a further 333,000 sq ft set to be redeveloped in the next two to three years;
- In terms of industrial and manufacturing uses, we have demonstrated current demand in excess of 3.12m sq ft in Greater Cambridge which requires approximately 180 acres (73 ha) to be satisfied, assuming a 40% plot ratio;
- For storage and distribution uses, we have demonstrated current demand in excess of 2.23m sq ft in Greater Cambridge which requires a further approximately 130 acres (53 ha) to be satisfied. There are no significant sites available with a B8 allocation in Greater Cambridge. We have demonstrated that there is insufficient land with outline permission to meet this demand.

1.3 Conclusions

- Considering the large size and scale of J25 Bar Hill and its location immediately adjacent to the strategic highway network, Bar Hill, Northstowe and Waterbeach, there is an opportunity to create significant employment floorspace to meet current and predicted future demands and cater for a diverse range of occupier requirements;
- J25 Bar Hill 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 and provides opportunities for local employers to move out of the centre of Cambridge;
- Proposals for an employment hub at J25 Bar Hill are therefore complementary to the current supply of land and premises in Greater Cambridge and will not prejudice the delivery of any other site. We strongly believe the site would be a valuable addition to the depleted portfolio.

2.0 Introduction

- 2.1 Bidwells is instructed by Lolworth Developments Ltd (LDL) to consider the market need for employment development at land to the north of the A14, adjacent to J25 at Bar Hill, close to Cambridge. This report examines the demand and supply dynamics of the commercial market in a national, regional and local context.
- 2.2 The subject site extends to approximately 100 ha at a strategic location directly adjacent to the A14. The A14 is the main road link connecting Felixstowe to the Midlands, with the section immediately to the west of this site benefitting from a major £1.8b infrastructure upgrade.
- 2.3 The site could accommodate over 3m sq ft (278,700 sq m) of new E(g)/B2/B8 employment space to meet both the local and wider regional occupier demand in a range of different unit sizes. It is likely that the site, due to its scale, will contain units with larger floor plates in order to assist with the funding of the upfront infrastructure required to deliver a site of this scale and ensure viability. However, a mixed range of sizes and uses is envisaged as it becomes established.
- 2.4 The purpose of this report is to advise as to the level of demand from commercial occupiers and how they could be accommodated on the supply side by land within Greater Cambridge and the associated industrial and logistics market (as defined in Section 4.0). The report demonstrates that the subject site has the potential to:
- Maximise the investment opportunity provided by the key strategic location adjacent to the A14, at the top of the M11 and connecting to the A1(M);
 - Maximise the benefits of future public and private sector investment in this location and along the Oxford to Cambridge corridor (also referred to as the 'OxCam Arc');
 - Meet the acknowledged need for accommodation for supply chain companies, last-mile delivery and to attract UK manufacturers;
 - Meet the significant levels of demand for high-quality employment floorspace in the wider region along the A14 and A1 corridors, attracting new investment to Greater Cambridge and expanding upon growth already seen;
 - Address the under-supply of land and premises in the immediate Cambridge area, particularly from occupiers who may be displaced from City Centre employment locations on sites due to be adopted for housing in the future.
- 2.5 The remainder of this report is set out as follows:
- National logistics and industrial market context and trends;
 - The market need for the site is considered, including an assessment of the demand for, and supply of, similar land and premises which may compete with the subject site. This section also includes a review of the existing portfolio of strategic employment land within Greater Cambridge and immediate surrounds; and
 - Summary and conclusions.

3.0 UK Industrial and warehouse market

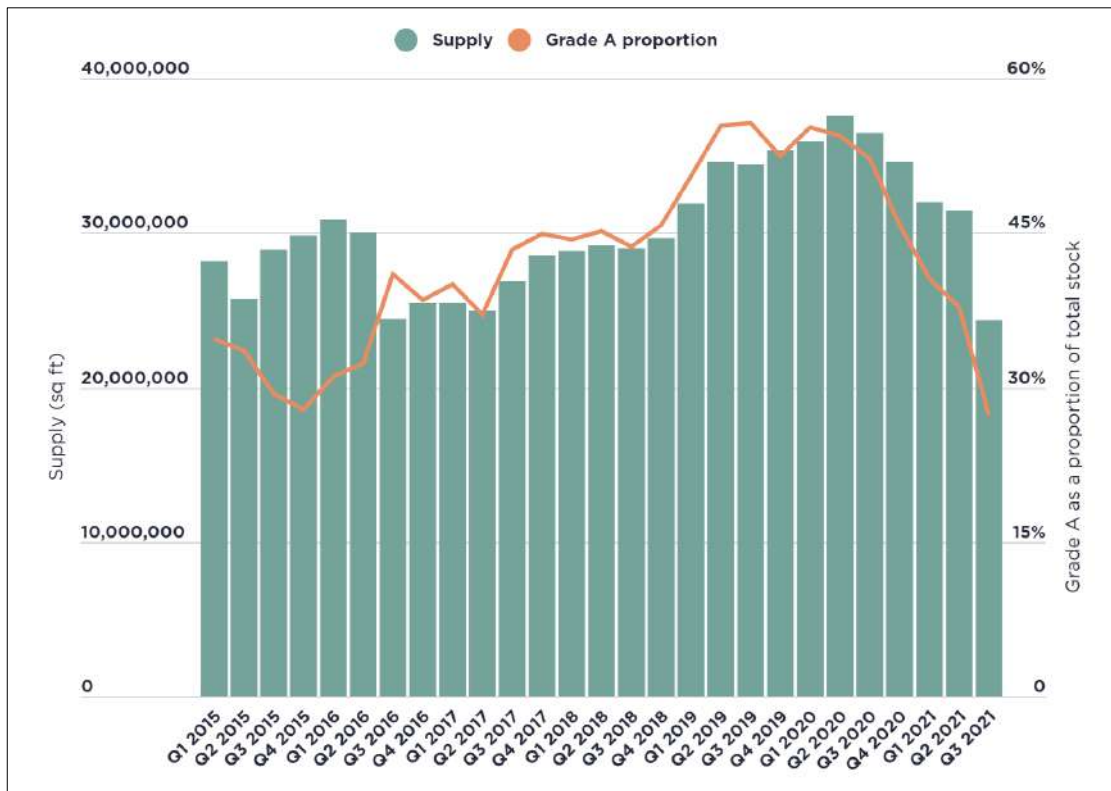
3.1 This section reviews the market dynamics for industrial and warehousing units of 9,295 sq m/100,000 sq ft and above at a national and regional/local level. The statistics used include industrial (E(g) / B2) and warehouse/storage and distribution (B8) uses.

3.2 National Market Context - Supply

3.2.1 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 25m sq ft. This is down by nearly 7m sq ft from the start of the year, with supply falling at its fastest rate ever recorded. As shown in the graph below, this is particularly the case for Grade A space, which has seen a sharp decline over the past 12 months.

3.2.2 In light of this contraction of supply, new speculatively developed space is gradually coming to the market, with a pipeline of approximately 17m sq ft which comes as a direct response to the chronic supply vs demand imbalance, as developers look to provide much-needed accommodation.

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



Source: Savills Research

3.4 UK National take up

3.4.1 Take-up in 2020 reached record levels, with approximately 50m sq ft transacted. 2021 looks set to equal, if not better this. At the mid-way point of 2021, approximately 24m sq ft has been transacted. Again, this is a new H1 take-up record and over 80% above the long-term H1 average of approximately 13m sq ft. These high take-up figures continue to reflect the strong occupier demand that currently exists within the market.

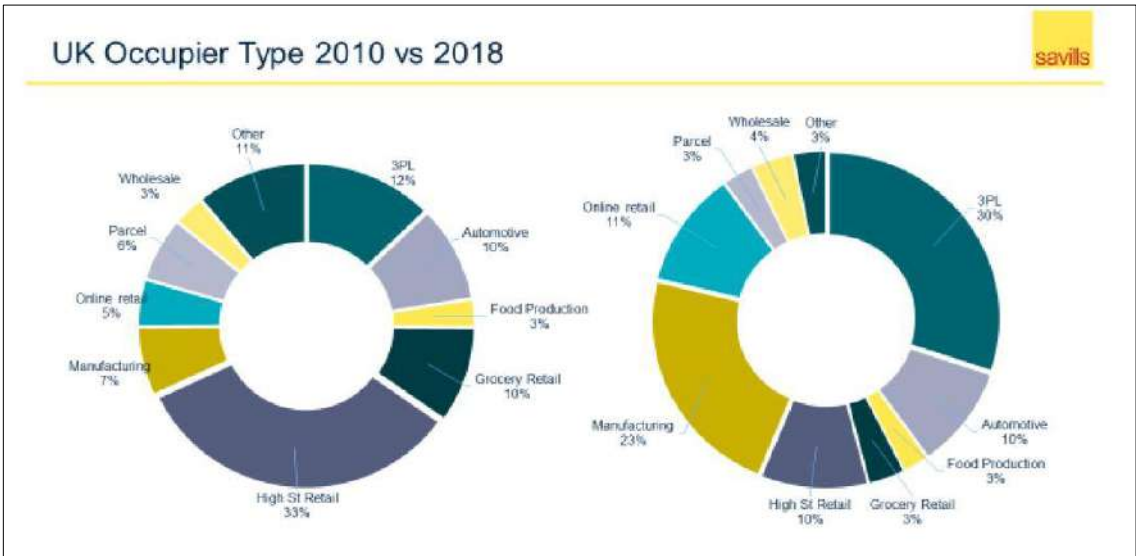


Source: Savills Research

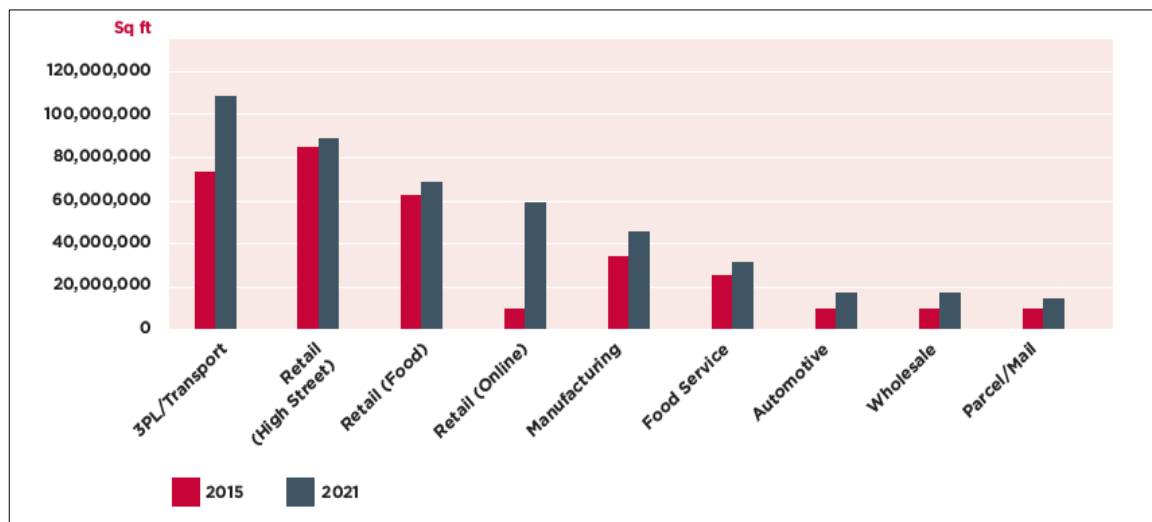
3.4.2 With the shortage of large units, build-to-suit is the preferred route for occupiers and they will locate where consented and deliverable land is available. Large manufacturers often require bespoke buildings on a build-to-suit basis, enabling them to invest significantly in their futures.

3.5 Occupier mix

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



Source: Savills Research and Costar



Source: UK Warehousing Association

3.5.2 Notably, 3rd party logistics (3PL) occupiers increased their take-up from 12% to 30% between 2010 and 2018, substantially driven by the trend towards online shopping. They continue to be the dominant occupiers in 2021.

3.5.3 However, by far the most significant growth has been seen in online retailers, who have increased their warehouse footprint from approximately 8m sq ft to 60m sq ft, a rise of more than 600%, in six years. This is unsurprising given the well-documented structural change we have seen in the retail sector, accelerated more recently by the COVID-19 pandemic. Linked to this, parcel delivery companies have seen their footprints increase significantly.

3.5.4 Manufacturing has also grown more than threefold, from 7% to 23% between 2010 and 2018, growing by nearly 50% over the last six years.

3.6 Demand trends

3.6.1 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.

3.6.2 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 - the ability to consolidate and distribute 'mixed loads' results in fewer HGV journeys being required, resulting in environmental benefits.

3.6.3 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.

3.7 Implications for the property market

3.7.1 The continuing shift away from manufacturer/suppliers delivering direct to their customers has seen a rise in the average size of buildings and has led to an increase in plot sizes necessary to accommodate them. 2020 saw take-up of extra-large warehouses (over 250,000 sq ft) and large warehouses (over 100,000 sq ft) increase by approximately 40% and 15% respectively vs the five year average.

3.7.2 The long-term trend has been an increase in eaves heights provided to allow greater occupier flexibility and numbers of loading doors for greater efficiency. Specifically, greater eaves heights allow for increased racking capacity. More recently, an increase in height has been driven by the e-commerce sector and the need to install mezzanine floors to aid storage and human stock picking.

3.7.3 Clearly this also has a direct impact on the size of overall schemes capable of accepting these larger buildings and the speed at which sites are taken-up.

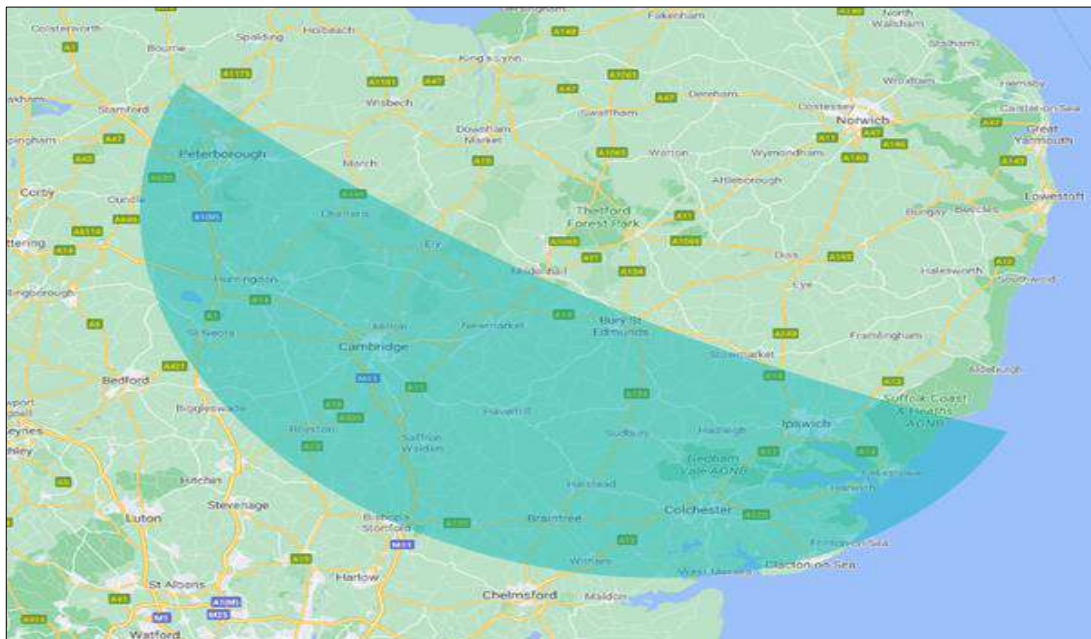
3.7.4 Implications for the property market include:

- A significantly increased demand for employment land and floorspace which can meet the needs of the online retail sector, i.e. large, well-located sites which allow the construction of bespoke units and enable occupiers to achieve the fastest possible fulfilment times;
- A significant proportion of demand is now for larger units and plot sizes;
- Consequently, a direct impact on the size of overall schemes capable of accepting these larger buildings and the speed at which sites are taken-up;
- A choice of sites is needed which can accommodate a range of bespoke requirements in terms of location, scale and configuration of unit;
- In order to maximise the economic potential of the logistics sector, it is essential to provide the appropriate accommodation and sites to deliver the required accommodation.

4.0 Greater Cambridge regional and local industrial market

4.1 Defining the markets

- 4.1.1 The site at J25 Bar Hill can suitably accommodate the growing trend for larger, single units for the burgeoning industrial, logistics, manufacturing and technology sectors. This section focuses on and addresses the local / regional market and analyses the current supply of existing units and sites capable of accommodating units as proposed.
- 4.1.2 We have focused on the areas where a likely occupier would consider if seeking representation within the area. Larger occupiers who do not already have a base within the area generally are more footloose when selecting a location, whereas existing Greater Cambridge occupiers, for example, would look to remain in Greater Cambridge + 10/15 miles due to staff retention.
- 4.1.3 For the purposes of this assessment, we review the demand/supply position across the 'immediate property market', which is the market in Greater Cambridge expanding to 20 miles.
- 4.1.4 However, it should be noted that the site also relates to a wider market due to its characteristics and potential to accommodate strategic logistics need. In particular, the 'regional market' of the site includes an area bounded by Peterborough to the north, Bishop's Stortford to the south, St Neots & Huntingdon to the west and Felixstowe to the east. This area is generally defined by the A1(M), A14 and M11 corridors (see plan below).
- 4.1.5 Based on the occupiers' requirements and live enquiries currently in our database, we consider the wider property market associated to J25 Bar Hill to extend from Peterborough to Felixstowe across the A14 Freight Corridor and other trunk road corridors mentioned above. As mentioned in earlier sections, large manufacturers have a wide geographical search area and are often footloose. They will choose to locate where their search criteria are best satisfied and buildings are deliverable. Additionally, logistics operators are seeking reconfiguration of their supply chains in response to Brexit and the global pandemic and increasingly seeking local delivery centres and hubs to serve majors towns and cities.



- 4.1.6 The south east as a region is a key occupational market with the long-term average take-up amounting to the highest for any UK region. However, Cambridgeshire to the east, although forming part of this strong south-east region, lags behind its neighbouring counties in terms of provision of industrial floor space and employment land and is chronically undersupplied when compared to demand.
- 4.1.7 The impact of the port of Felixstowe is very significant on the wider region. Felixstowe is the UK's biggest and busiest container port and one of the largest in Europe. The port handles more than 4million TEUs (Twenty-foot Equivalent Units) and welcomes approximately 2,000 ships each year, including the largest container vessels afloat today. Approximately 17 shipping lines operate from Felixstowe to and from over 700 ports around the world.³
- 4.1.8 Felixstowe has recently been awarded Freeport status, along with Harwich port, and will provide businesses investing in the area with various tax deductions, capital allowances and relief on business rates and national insurance contributions. This is expected to generate a Gross Value Added of £5.5 billion over the next 10 years.
- 4.1.9 Within the vicinity of the port, the A14 carries approximately 36,668 vehicles per day, of which approximately 7,000 (18.6%) are HGVs.⁴ It is expected that the numbers of HGVs will increase over the coming years, driven by investment in the area.
- 4.1.10 Traditionally, 70% of containers coming through Felixstowe have been delivered to what is known as the 'Golden Triangle', a region in central UK where many of the country's main high street and online retailers have their national distribution centres. However, we are now seeing a shift in this pattern and businesses are looking to offload containers locally. A prime example of this can be seen with the success of Suffolk Park, Bury St Edmunds, where Belgian logistics company, Weerts, developed an 870,000 sq ft warehouse on 42 acres joining Chinese consumer goods importer, MH Star, who took occupation of 206,000 sq ft in mid-2020.
- 4.2 **Current Available Units > 100,000 sq ft in the regional market (as at December 2021)**

- 4.2.1 Currently, there is only one existing building available > 100,000 sq ft within the regional market (see table below) and this is of lower quality. Developers have responded to the lack of supply by building speculatively, with four units totalling approximately 635,000 sq ft shortly to commence construction in Peterborough (Peterborough South) and Bury St Edmunds (Suffolk Park). Once this existing unit is taken out of the market, it will leave very limited choice for occupiers seeking a facility in the region and no options for those seeking a modern facility.

PHOTO	UNIT	COUNTY	GRADE	SIZE (SQ FT)
	Gipping Way, Stowmarket, IP14 1EY	Suffolk	B	188,971

- 4.2.2 There are no existing units above 100,000 sq ft available in the Greater Cambridge administrative area and a 20 mile radius and indeed, no available units across the whole of Cambridgeshire.

³ Source: Hutchison Ports

⁴ Source: Royal HaskoningDHV

4.3 Immediate Market

- 4.3.1 Focusing closer to Greater Cambridge and a 20 mile radius from the City, supply of industrial floor space fell to its lowest level in more than 20 years, with just over 208,000 sq ft on the market at the end of June 2021. This is a staggeringly low vacancy rate of just 2.4% highlighting the enduring shortage of accommodation (see chart below).



Source: Bidwells Research

- 4.3.2 Two new schemes at Gateway Cambridge, Bar Hill (107,330 sq ft) and Bourn Quarter, Bourn (288,000 sq ft) will bring forward much-needed stock, albeit as mentioned previously, Gateway Cambridge is a redevelopment of an existing industrial park of similar floor space. As such, it is not considered as an additional capacity, but re-provision of existing stock.
- 4.3.3 Both schemes have seen strong levels of pre-let interest, with Bar Hill 31% committed and Bourn has already secured over 40% of pre-lets. This is unprecedented, and we estimate both schemes will be significantly let prior to completion as occupiers have such limited options around Cambridge.

- 4.3.4 The availability of land with outline consent for E(g), B2 and B8 in a regional context is also severely restricted, particularly around Greater Cambridge. The table below illustrates the limited options for immediate future employment development within the immediate market. This shows sites > 10 acres (4 ha) with outline planning consent for E(g), B2 and B8:

SITE	PLANNING STATUS	SIZE
Cambridge		
None		
Huntingdon		
Land south of Percy Road, Huntingdon (Lightning Park)	Outline consent secured for approximately 160,000 sq ft industrial & warehousing within classes E(g), B2 and/or B8 and ancillary office floor space.	20 acres (8 ha)
Peterborough		
Flagship Park, Edgerley Drain Road, Eastern Industry, Peterborough, PE1 5YG	Outline consent secured to deliver a wide range of industrial accommodation (E(g)/B2/B8) of up to 850,000 sq ft.	127 acres (51 ha)
Peterborough South, Commerce Road, Kingston Park, Peterborough, PE2 9EN	Detailed planning consent secured for up to 475,000 sq ft of E(g), B2 and B8 uses.	21 acres (8.5 ha)
Ely		
Lancaster Way Business Park, Ely, CB6 3NX	Detailed planning consent for up to a further c.550,000 sq ft of E(g), B2 and B8 uses.	32 acres (13 ha)
Newmarket		
None		
Bury St Edmunds		
Suffolk Park, Bury St Edmunds, IP32 7FQ	Outline planning consent for up to 2m sq ft of E(g) & B8 uses.	114 acres (46 ha)
Stowmarket		
Gateway 14, Stowmarket, IP14 5EP	Outline planning consent for up to 2.36m sq ft of E(g), B2 & B8 uses.	156 acres (63 ha)
Ipswich		
Orwell Logistics Park, A14 Westbound, Ipswich, IP10 0DD	Outline planning consent for up to 1.18m sq ft of B8 uses.	60 acres (24 ha)
Eastern Gateway, Sroughton Road, Ipswich, IP1 5AQ	Outline planning consent for approximately 1m sq ft of E(g), B2, B8, motor sales, hotel and local retail uses.	58 acres (23.5 ha)

SITE	PLANNING STATUS	SIZE
PortOne Logistics Park Great Blakenham Ipswich, IP6 0FL	Outline planning consent for approximately 750,000 sq ft of B8.	43 acres (17.5 ha)
Bishop's Stortford		
None		
Total	9,325,000 sq ft	631 acres (254.5 ha)

Source: Bidwells Research

- 4.3.5 Local developer, the Anderson Group, has submitted proposals to develop a 350,000 sq ft last mile delivery and distribution scheme at Coldhams Lane, CB1. The industrial development will be part of a larger scheme which will also create an ecology park and an urban country park at the site of local beauty spot, Cherry Hinton Lakes. At the time of writing, this was still going through the planning process. The developer has confirmed they are in discussions for approximately 60% of the scheme given it's the only option for occupiers within the City.
- 4.3.6 We are also aware of additional land at Northstowe (8.7 acres) where a possible employment-led scheme may be forthcoming. At present, neither site benefits from an outline consent, therefore could not be included within the available land supply and are also not capable of accommodating the size and scale of units proposed at J25 Bar Hill.
- 4.3.7 Our expectation is that the supply dynamic is due to contract further during the next two to three years, particularly if we see similar levels of take-up that we did in 2020 across the region.
- 4.3.8 The Cambridge planning policy is focussed on the provision of new housing, with the local plans allocating a number of major existing industrial estates for future residential. These are noted below:
- The Paddocks Industrial Estate, Cambridge, CB1 8DH – 135,000 sq ft;
 - Clifton Road Industrial Estate, Cambridge, CB1 7ED – 193,000 sq ft;
 - Dales Manor, Sawston, CB22 3TJ – 160,000 sq ft;
 - Unity Campus, Sawston, CB22 3FT – 85,000 sq ft;
- 4.3.9 A total of approximately 1.3m sq ft of occupied employment land in Cambridge city is allocated for residential development in the Cambridge Local Plan 2018, with further sites such as Dales Manor and Unity Campus in Sawston (Greater Cambridge) also allocated for alternative uses. This wave of displacement has already begun, with 94,000 sq ft of industrial land being repurposed for residential or other uses, and a further 333,000 sq ft set to be redeveloped in the next two to three years. A map displaying the location of these sites is included at Appendix 1.
- 4.3.10 When these sites are developed, occupiers will need to be rehomed and this will further impact on the overall levels of industrial and warehouse stock for which new allocation has not, to date, been forthcoming.

4.4 Take Up in the regional market

- 4.4.1 Take up within the wider regional market in 2020 was close to 3.8m sq ft of transactions for units above 100,000 sq ft, the highest amount ever recorded across the region. Given the lack of existing buildings, 'built to suit' transactions accounted for the majority of all new space taken in the past c.18 months.
- 4.4.2 Comparing this to the current levels of supply at 190,000 sq ft, this shows that there is remarkably less than one months' worth of supply at the current rates. As such, the identified requirement of only approximately 260,000 sq ft in Greater Cambridge until 2040 is woefully inadequate.
- 4.4.3 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. The table highlights the unprecedented levels of take-up seen in the region over the past two years:

IMAGE	DATE	ADDRESS	SIZE	TENANT
	U/O	Suffolk Park, Bury St Edmunds, IP32 7QB	394,454	TBC
	U/O	Kingston Park, Peterborough, PE2 9EN	736,708	TBC
	November 2021	Delta Park, Shrewsbury Avenue, Peterborough, PE2 7BY	645,000 pre-let	TBC but understood to be Covid-19 related.
	July 2021	G385, Gateway Peterborough	385,000	Oatly
	June 2021	SP76, Suffolk Park, Bury St Edmunds	76,450	Hermes Parcelnet
	March 2021	Plot 302b, Gateway Peterborough	140,000	Amazon
	February 2021	G226, Gateway Peterborough	226,000	MH Star

IMAGE	DATE	ADDRESS	SIZE	TENANT
	January 2021	Plot 1600, Suffolk Park, Bury St Edmunds	860,000	Weerts Group
	Dec 2020	DHL, Stanton, Suffolk	620,000	DHL (Sale & Leaseback)
	Nov 2020	Huntingdon 129, St Peter's Road, Huntingdon	129,222	FedEx
	Nov 2020	Kingston 189, Kingston Park, Peterborough	189,000	Taylor Wimpey
	July 2020	Plot 113, Gateway Peterborough	635,000	McCormick
	July 2020	Alpha Plus, Alpha Drive, St Neots	221,801	Hotel Chocolat
	June 2020	SP206, Suffolk Park, Bury St Edmunds	206,000	MH Star
	March 2020	Plot 400, Gateway Peterborough	432,000	URBN

4.5 Regional market demand

- 4.5.1 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 2020 and H1 2021, 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.

- 4.5.2 The table in paragraph 4.6 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 2018 which remains unsatisfied. Not all these requirements will culminate in a transaction, however, it highlights over 7.18m sq ft of active demand in the general area of Bar Hill.
- 4.5.3 Many of these requirements would welcome the opportunity to establish themselves or have a facility close to Cambridge, but the lack of sites during the previous 10 years has restricted anyone seeking a facility of over 100,000 sq ft from accommodating themselves within the immediate Cambridge area.
- 4.5.4 A good recent example of this is CMR Surgical. They have a requirement for a 250,000 sq ft facility in Cambridge. However, due to lack of supply of available land or buildings to accommodate this, they have had to split their requirement to lease a 75,000 sq ft build-to-suit unit at Lancaster Way, Ely.

4.6 Regional Market Requirements

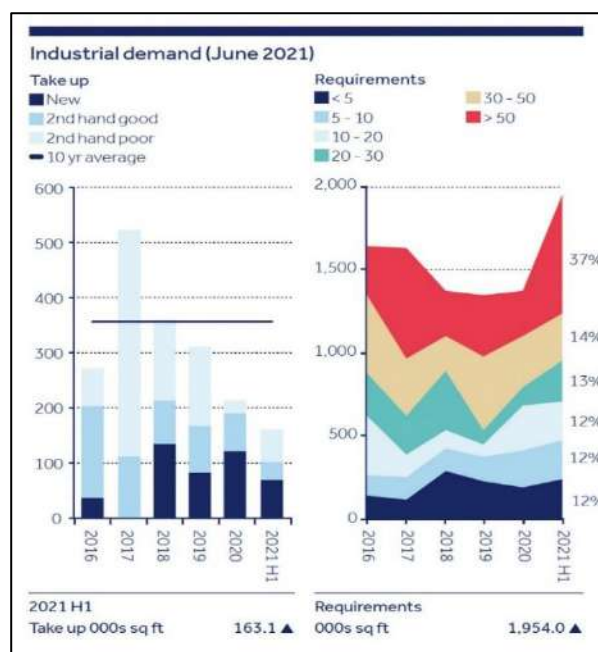
OCCUPIER / AGENT	SIZE	PLANNING USE	COMMENTS
Amazon	30 acres 380,000 sq ft	B8	Seeking site for next day fulfilment to service Cambridge. Wish to take advantage of Cambridge tech staffing requirements.
DHL	10 acres 200,000 sq ft	B8	Needing site for a relocation and expansion. Ideally Cambridge but due to lack of options seeking further afield.
Light manufacturer & high street retailer c/o Bidwells	850,000 sq ft	B2/B8	East Anglian-based food retailer looking for significant expansion space to service local and international markets and burgeoning online retailing business.
Yodel c/o Penn Commercial	100,000 sq ft	B8	Cambridge + 10 miles. Will consider D&B opportunities.
Eddie Stobart	300,000 sq ft	B8	For storage and distribution of chilled/frozen products on behalf of a Cambridge based occupier.
Centrado	100,000 sq ft	B2	Seeking new facility from Huntingdon. Wishing to be closer to Cambridge
c/o Knight Frank	150,000 - 200,000 sq ft	B8	On behalf of national retailer looking for regional warehouse facility
c/o CBRE	200,000 - 300,000 sq ft	B2	Manufacturing requirement focused on Cambridge.
Hermes	100,000 sq ft	B8	Seeking new hub for parcel handling to service Peterborough and Cambridge
UK leading garden products supplier/ manufacturer	750,000 sq ft	B2/B8	Looking for a site on the A14 for 3 years. No site large enough to accommodate their expansion plans.
c/o Knight Frank	250,000 - 300,000 sq ft	B8	Seeking new/modern facility for retailer seeking an East Anglia distribution centre
c/o Fisher Hargraves Proctor	200,000 - 300,000 sq ft	B2	Food manufacturing user seeking site A1/M11

OCCUPIER / AGENT	SIZE	PLANNING USE	COMMENTS
c/o Savills	65,000 - 100,000 sq ft	B2	Looking for 1-1.5 acre yard with min. 5 dock level and 4 level access doors preferred. Must have fibre and 500kva power.
c/o Montagu Evans	100,000 - 150,000 sq ft	B2	Manufacturing facility for science related products and machinery.
XPO Logistics c/o Louch Shacklock and Partners	200,000 - 300,000 sq ft	B8	Acting for a client seeking a UK fulfilment centre close to Cambridge.
MM Flowers	50,000 - 100,000 sq ft	B2	
DFDS	150,000 - 200,000 sq ft	B2/B8	Looking for facility to service existing customer based in Cambridgeshire
Wincanton	250,000 - 300,000 sq ft	B8	Seeking regional distribution hub along the A14
c/o SBH	150,000 - 200,000 sq ft	B2	Modern facility required with temperature-controlled fit-out
IFP	200,000 - 250,000 sq ft	B8	Seeking UK headquarters for mirror European facility
MH Star	800,000 sq ft	B8	Seeking site along the A14 for global fulfilment centre.
Manufacturing occupier c/o Banks Long	500,000 sq ft	B2	Searching across east Anglia with a focus on Cambridge/Newmarket.
Modular House Builder	400,000 sq ft	B2	Focus on Cambridge due to staff skills
Total	7,180,000 sq ft		Total listed demand for units > 100,000 sq ft within the regional market.

Source: Bidwells Research

4.7 Demand in Cambridge + 20 mile Radius

- 4.7.1 Focussing on Cambridge specifically, the demand for industrial floor space has risen to its highest levels in 14 years, standing at just under two million sq ft, with more than 36% of requirements for buildings of 50,000 sq ft and above (see chart below). This shows a “snapshot” of immediately live requirements actively in the market.
- 4.7.2 In recent years, demand for industrial floor space has been amplified by an acceleration in requirements from the ‘knowledge intensive’ sectors of the Cambridge economy, on top of the more traditional occupier base.



Source: Bidwells Research

4.8 Current Greater Cambridge Occupier Requirements – Looking to relocate.

OCCUPIER / AGENT	SIZE	PLANNING USE	COMMENTS
CMR Surgical	250,000 sq ft	E(g)/ B2	Wishing to identify a site for a new, sustainable, global manufacturing and design headquarters. No site available to accommodate. Will have to look at split sites. Have acquired one site in Ely.
Marshall	50,000 – 150,000 sq ft	B2/B8	Seeking relocation from airport site for new parts/technology hub. Cannot identify a sizable site in the area.
AstraZeneca	100,000 sq ft	E(g)/B2/B8	Manufacturing and logistics facility to service Cambridge Campus
Wedd Joinery	50,000 – 100,000 sq ft	B2	Joinery company wishing to stay within South Cambs but lack of options
Granta Processors	100,000 sq ft	B2	Seed manufacturing company wishing to stay within South Cambs but lack of options
NET Zero Buildings	200,000 sq ft	B2	Based in Six Mile Bottom and wishing to increase capacity but cannot due to lack of land options.
Inca Digital	100,000 sq ft	E(g)/B2	Needing to expand from existing Cambridge facilities. Require modern building. No site capable of unit of this size
Confidential Cambridge occupier	100,000 - 120,000 sq ft	E(g)/B2	Looking to combine office and production/tech space into one 'super-hub'. No site options for mid-tech facility.
Confidential Cambridge occupier	60,000 - 100,000 sq ft	E(g)/B2	Cambridge Science Park occupier seeking to relocate into modern manufacturing facility close to Cambridge.

OCCUPIER / AGENT	SIZE	PLANNING USE	COMMENTS
Confidential Cambridge occupier	100,000 sq ft	E(g)/B2	Cambridge Science Park occupier seeking to relocate into modern manufacturing facility close to Cambridge.
Total	1,320,000 sq ft		Total listed demand for units > 100,000 sq ft from Cambridge-based occupiers looking to grow/relocate.

Source: Bidwells Research

- 4.8.1 You will notice from the table that there is currently approximately 1.3m sq ft of demand > 100,000 sq ft from occupiers already located within Cambridge. These occupiers have been seeking sites/buildings to expand their business which have been thriving during the previous three to four years. These are long-term requirements we are aware of, some of which will have been put on hold because of lack of available property options.
- 4.8.2 Due to the lack of allocated employment land for sizable buildings they are being stifled in their growth aspirations and are being forced to consider land/sites away from Cambridge, taking with them highly skilled jobs and economic opportunity.
- 4.9 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 which benefit from direct access and this is particularly acute around Cambridge;
 - There is a lack of high-quality employment land suitable for mid-range or large employment units;
 - Vacancy rates have been falling across both the wider regional market and local Cambridge market in particular, with supply levels being at a 20-year low;
 - The majority of take-up of larger units has been for build-to-suit opportunities. This demand for build-to-suit premises has direct implications for the demand for land;
 - The subject site provides the opportunity to add to South Cambridgeshire's depleted employment land portfolio, providing additional land which meets the needs of occupiers, being easily accessible to the A14 and A1 corridors and offering a range of unit sizes to serve the manufacturing and logistics sectors;
 - Cambridge has potential to attract demand which has previously been distributed elsewhere in the market area (Peterborough, Biggleswade, Bedford).
 - The proposals to construct 1m new homes in the Oxford to Cambridge Arc requires the commercial balance of large-scale employment land.

- 4.10 The proposals for an employment hub at J25 Bar Hill that will provide a wide range and scale of employment facilities are therefore complementary to the current supply of land and premises in Greater Cambridge and will not prejudice the delivery of any other site. We strongly believe the site would be a valuable addition to the depleted portfolio.

5.0 Summary and conclusions

- 5.1 Considering J25 Bar Hill context and characteristics, there is an opportunity to create high-value sector clusters in a mixed-use scheme blended to complement a diverse range of occupier requirements.
- 5.2 There is plainly the need for more employment land in Cambridgeshire, particularly around Greater Cambridge and in the A14 corridor. Many industrial sectors are increasing the size of their units to drive efficiencies and accommodate the automation and robotics that speed their processes and secure their business. Very large sites to accommodate these modern facilities are rare nationally and in Greater Cambridge specifically, there are no sites which could welcome a large employer.
- 5.3 Parts of the site are suited to hybrid buildings which are detached facilities encompassing office, administration, manufacturing and fulfilment functions in a single facility. Uniquely, the site could offer such a business room to expand and grow in the longer-term whether they might need more offices or more localised industrial facilities. A mixed-use site is ideal for attracting occupiers for whom a pure office does not suit their needs such as research and development businesses or laboratories, which require high office content hybrid buildings.
- 5.4 In terms of industrial and manufacturing uses, we have demonstrated current demand in excess of 3.12m sq ft which requires approximately 180 acres (73 ha) assuming a 40% plot ratio.
- 5.5 For storage and distribution uses, we have demonstrated current demand in excess of 2.23m sq ft which requires approximately 130 acres (53 ha) to be satisfied. There are no significant sites available with a B8 allocation. We have demonstrated that there is insufficient land with outline permission to meet this demand.
- 5.6 The J25 Bar Hill proposals would meet the gap in the demand and supply and offer a viable and deliverable opportunity to provide significant benefits to the local economy, as well as support the proposed future economic growth of the area.

Signed on behalf of
Bidwells LLP


.....
Walter Scott – Partner, Logistics and Industrial

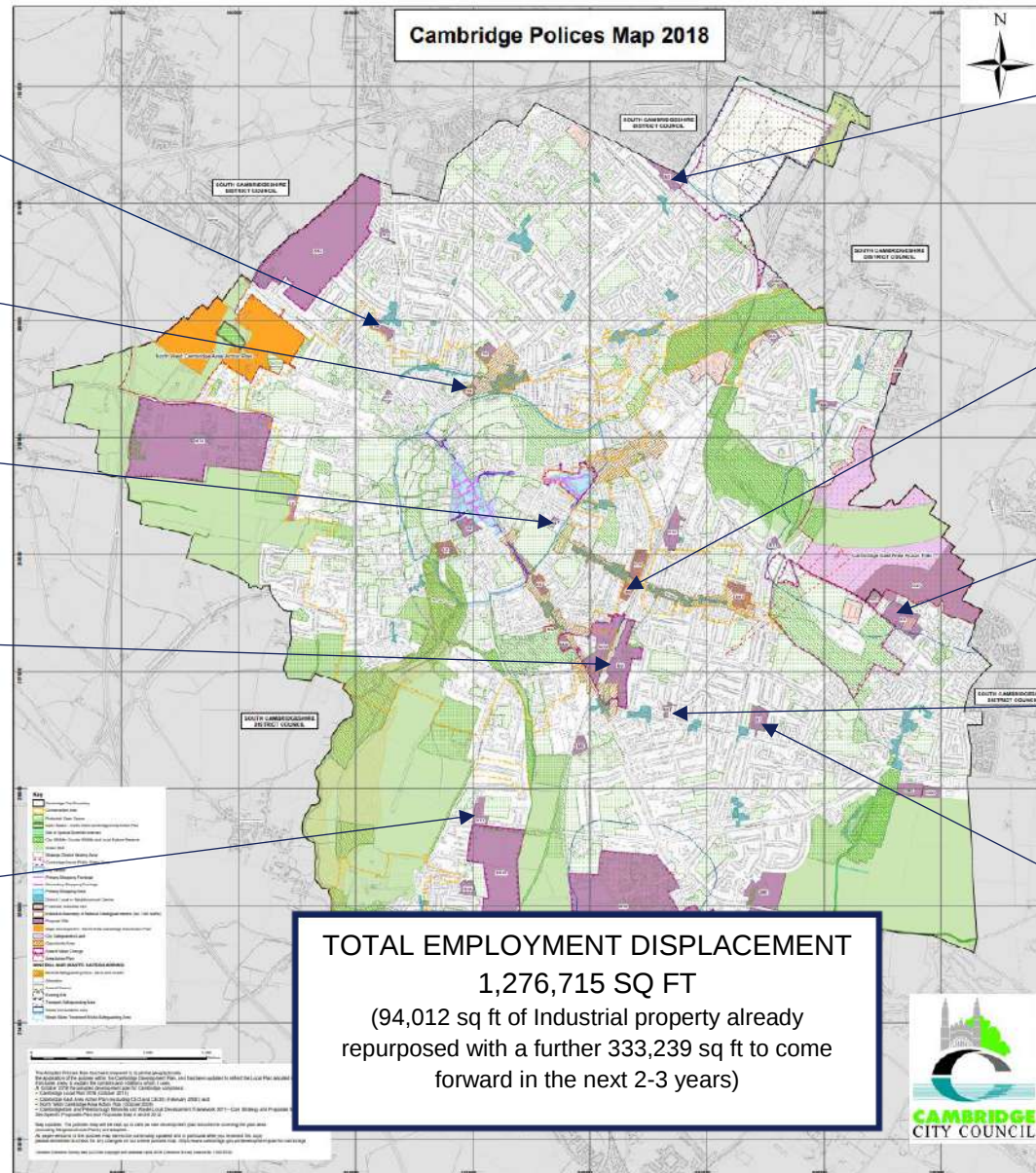

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Patrick Stanton – Partner, Head of Logistics and Industrial

Date: 07 December 2021

APPENDIX 1

MAP SHOWING EMPLOYMENT DISPLACEMENT IN CAMBRIDGE CITY

Cambridge Employment Displacement 2021



Site off Histon Road - (110,244 sq ft)

Henry Giles House, Chesterton Rd - (83,421 sq ft): Agent anticipates delivery of the scheme will begin in 2029-30

Parkside Police Station - (46,210 sq ft): New Cambridgeshire Police Station on Milton Park and Ride site set to be operational in 2023

Clifton Road Industrial Estate and Clifton Court - (193,422 sq ft): 5 year leases still being agreed on the Clifton Road estate. Half of the development expected to come forward before 2031.

BT Telephone Exchange - (216,355 sq ft)

Kia, 381 Milton Road - (56,953 sq ft)

Travis Perkins, Devonshire Road - (34,810 sq ft): set to be redeveloped for residential use. To include 134 units to rent.

Coldhams Lane site - (175,785 sq ft): Travis Perkins to repurpose for their own requirements. 3 other occupiers to be displaced in 2022.

149 Cherry Hinton Road - (59,202 sq ft): Currently being redeveloped into a 50,000 sq ft multi-let office building.

The Paddocks Business Centre - (135,000 sq ft): Old industrial scheme. Does not meet modern occupiers' requirements.

TOTAL EMPLOYMENT DISPLACEMENT
1,276,715 SQ FT
(94,012 sq ft of Industrial property already repurposed with a further 333,239 sq ft to come forward in the next 2-3 years)



Appendix 2 Savills Market Report

J25 Bar Hill

Market Demand Assessment

Lolworth Developments Limited

December 2021

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1. Executive Summary

1.1.1. Savills is instructed by Lolworth Developments Limited to advise on the market need for proposals for strategic employment development at J25 Bar Hill, Greater Cambridge.

1.1.2. The site extends to 100 ha gross and indicative proposals are for employment uses falling within E(g), B2 and B8 Class.

1.2. Sector Overview & Trends

1.2.1. ***Market trends all point to a significantly increasing demand for land overall, for larger, strategic scale sites which are capable of accommodating the largest occupier requirements, and for land within easy reach of the principle ports. The proposals at Bar Hill directly respond to these market trends.***

1.2.2. There has been a structural change in the retail and logistics sectors which has resulted in the considerable acceleration of the growth of on-line sales. This is a permanent change: consumer behaviour has changed and occupiers have invested in infrastructure to support the new on-line business model.

1.2.3. There is a strong link between the growth in on-line retail and the amount of warehousing space required (three times as much space is required for on-line compared to in-store fulfilment). This is especially the case for the largest units, and this has driven record breaking levels of take up in 2020 and throughout 2021 to date. Using the latest forecasts suggests that, nationally, there could be a requirement for an additional 5,593,054 sq. m (60.2 million sq. ft.) of new warehouse space, purely to meet the demands of the online sector by 2025.

1.2.4. The size of buildings required (floorspace and height), particularly by the logistics sector, is increasing as operators seek to maximise operational efficiencies and to account for changing trends in configuration. As a result of increased market demand and the larger scale of plots required, sites which are available are being taken up more quickly by fewer buildings and this has significant implications for the amount of land required in order to ensure sufficient market choice and continuity of supply.

1.2.5. Demand from the manufacturing sector is also for increasing unit sizes and an increase in land requirements as occupiers seek bespoke buildings.

1.2.6. Whilst the pandemic and BREXIT have created market uncertainty in some sectors, occupiers have responded to this by increased stockholding and 'on-shoring' and trends in the manufacturing and distribution sectors at a national and regional level show significantly increased demand and a corresponding fall in supply over the last 18-24 months. The importance of locations within close proximity and easy accessibility to the ports is a growing trend which will directly impact on demand within locations in the East of England and along this stretch of the A14, such as J25 Bar Hill.

1.3. National & Regional Market Indicators

1.3.1. There were record breaking levels of take-up nationally throughout 2020 (80% over the long term average) as a result of the increase in on-line retailing which has been accelerated due to the COVID-19 lockdowns. This trend has continued with take up figures to Q3 2021 being higher still.

1.3.2. Demand is increasingly for **Grade A** and speculatively constructed space, reflecting occupier's requirements for the highest quality buildings. There is also a long term trend nationwide towards demand for **larger units**. The majority of available premises are at the smaller size ranges and demand for the largest units will therefore be via build to suit options where serviced sites with planning permission are available.

1.3.3. Strong demand and rapid take up has resulted in a **severe shortage of supply of premises** nationwide (**c. 1 years supply**). There is a particularly severe shortage of supply of the best quality Grade A space which now stands at just 6.91 million sq. ft., **the lowest level ever recorded**.

1.3.4. The East of England has seen a significant increase in occupier requirements over the course of the last 12 months, driven by the increasing awareness of the benefits which the location can offer in terms of accessibility and proximity to the East Coast Ports, London and the South East and Midlands markets. Take-up at a regional level was **117% of the long term average** at H1 2021, but does not reflect the true scale of demand, being constrained by a lack of availability of land and premises as demonstrated by the vacancy rate of 2.81% which is well below the level required to maintain market equilibrium.

1.4. Market Area Demand

1.4.1. Within the Property Market Area (PMA):

- There is significant demand across the PMA which translates into strong ongoing levels of take up;
- Occupier demand is focused on the best quality units which can meet modern business requirements;
- Units at the larger size ranges make up a key component of demand. The average size of unit transacted ranged from 26,508 sq. m -28,239 sq. m (285,340 – 303,962 sq. ft.) and 38% of take up by floorspace is of units of 46,451 sq. m (500,000 sq. ft) plus.
- Cambridgeshire is an important sub-market, accounting for a quarter of all take-up within the PMA, which is focused on Peterborough due to availability of supply in this location.
- Take-up is driven by availability of high quality supply and where sites become available this can have a marked impact on historic take-up rates, as evidenced by Suffolk Park.
- There are a number of active requirements (local, regional and national) that would be suitable for the proposals if they were available now.

1.5. Market Area Supply

1.5.1. Analysis of supply within the assessment areas demonstrates that there is a critical shortage of both land and premises available to satisfy occupier requirements and in the planning pipeline:

- There is only **0.46 years supply of units** in the PMA and even including available (consented and serviced) land, the supply is severely insufficient in quantitative terms with only around **1.40 years' supply within the PMA and the WMA (land and buildings)** with a particularly severe shortage in the Core Market Area where there is only 1.31 years' supply in total.
- **If take-up continues at historic average rates, the current consented and deliverable supply will be eroded entirely within 16 months in the Core Market Area (c. 18 months in the Wider Market and Property Market Areas).**
- The pipeline of sites within the planning process is therefore of vital importance. Sites within the pipeline are subject to varying degrees of risk in terms of planning and delivery – an allocation within a local plan in no way guarantees that a site will come forward and those that are delivered often take longer than anticipated and may or may not provide premises which are of a comparable strategic scale to those proposed at Bar Hill.
- Even if all the potentially comparable sites in the pipeline came forward for development (which is unlikely), there would still only be **4.74 years supply in total (including all comparable allocations, draft allocations, available consented land and premises) within the PMA**, and this falls to 4.05 years in the WMA.
- Unlike for housing land, there is no guidance around the amount of supply which should be provided. There are various approaches which could be taken. Other studies have considered that 15 years' supply of strategic employment sites should be provided.¹ Alternatively, using the approach taken to housing land would require a five year supply plus an appropriate buffer to allow for market choice (which should be considerable in the case of employment land to reflect the diverse nature of occupier requirements).
- **By either measure, the supply of land within the PMA is insufficient** to meet demand given the risk attached to the pipeline of sites and the length of time over which local plans within the PMA should be providing land.
- Furthermore, supply is very likely to be eroded even faster than these headline figures, which are based on historic take-up, suggest given the structural changes which have taken place in the market and the step change in demand which has resulted.

¹ Peter Brett, West Midlands Strategic Sites Study (2015).

- The majority of available sites (almost 70%) are only able to accommodate units at the smaller size ranges and this does not match the demand profile, with 38% of take up by floorspace being for units of 46,451 sq. m and above.
- Cambridgeshire has a particular undersupply in relation to previous take-up, with the area accounting for only 16% of available supply, but 25% of past take-up.
- Indicative of the strength of demand and lack of supply, a significant proportion of land allocated within local plans across the PMA has either already been delivered (completed and fully let) or is in the process of being delivered, having been granted planning permission.

1.6. Conclusion

1.6.1. Against a backdrop of strong and increasing demand, the supply position within the PMA is severely constrained. The pipeline of sites which can accommodate units of 9,290 sq. m plus is wholly insufficient in both quantitative and qualitative terms and, even assuming all the sites came forward would last for less than 5 years. There is therefore a very urgent need for additional strategic employment allocations which can meet the needs of both the manufacturing and logistics sectors.

1.6.2. J25 Bar Hill is ideally placed from a market perspective to help to meet this need and would see very strong demand from occupiers on the basis of its locational credentials and excellent accessibility to both the East Coast ports and onward consumer markets.

2. Introduction

2.1.1. Savills is instructed by Lolworth Developments Limited to advise on the market need for proposals for strategic employment development at J25 Bar Hill, Greater Cambridge.

2.1.2. The site extends to 100 ha gross and indicative proposals are for employment uses falling within E(g), B2 and B8 Class. The precise mix of uses and unit sizes will be determined at a later stage but, based on the excellent accessibility and locational credentials of the site, is likely to include a range of B2/B8 units with the focus being on units of 9,290 sq. m plus.

2.1.3. The scale and strategic location of the site means that the proposals will respond to local, regional and national markets. The site's location immediately adjacent to the A14, and with close proximity of the A1 and M11 means that excellent east-west and north-south connectivity is available, enabling occupiers to serve the East Coast Ports, the South East and Midlands markets from this location.

2.1.4. Nationally and regionally there is a severe shortage of both units and available land, on the basis of continuing very strong levels of demand, particularly from the logistics sector. The recent COVID lockdowns have precipitated a step-change in the level of demand seen from the on-line retail sector and this has driven exceptionally high levels of take-up, which has depleted the already low levels of supply which were available. The proposals respond to this significant market need and are ideally placed to contribute towards meeting the considerable market demand for additional strategic scale employment land, locally, regionally and nationally.

2.1.5. The purpose of this report is to assess the scale of the market need for the proposals. The remainder of this report is therefore structured as follows:

- A review of the structure of the logistics sector and key trends in the manufacturing and logistics sectors and their implications for the property market is provided at Section 3;
- National and regional market indicators in relation to the supply and take-up of units in excess of 9,290 sq. are assessed at Section 4 in order to provide the current market context for the proposals;
- An assessment of supply and demand within the defined market assessment areas is undertaken. The methodology of the assessment is outlined at Section 5, demand is reviewed at Section 6 and an analysis of supply of buildings and land (available and pipeline) is provided at Section 7;
- Conclusions are set out at Section 8.

3. Sector overview and trends

3.1.1. Trends in the logistics and manufacturing sector are fundamental to assessing the quantum of demand for strategic employment land, and specifically for the proposals at Bar Hill. An overview of the logistics sector and key trends in both the manufacturing and logistics sectors are outlined below.

3.2. Logistics sector overview

3.2.1. The logistics and distribution market essentially consists of four different types of organisation that are involved directly:

- *Manufacturers/producers* – provide semi-finished goods for input into another production process and finished goods for sale to either retailers or suppliers. Increasingly, the distinction between manufacturing and distribution is becoming blurred, with many manufacturing firms adopting multiple supply chain strategies.
- *Suppliers* – buy semi-finished or finished goods before selling them on to other manufacturers or retailers, often the UK distributor of overseas manufacturing products.
- *Retailers* – organisations that sell goods to the general public.
- *Logistics Operators* (Third Party Logistics, 3PLs) – these organisations undertake the movement and handling of goods on behalf of the above.

3.2.2. Linking the first three organisations is the fact that they actually own the goods they ship out or receive in. Logistics operators are simply 'custodians' of goods while they are being moved and handled on behalf of the other three organisations.

3.2.3. The 'hub' of most medium to large sized logistics operations is the distribution centre, of which there are basically two types. National Distribution Centres (NDC) act as inventory holding points for imported and nationally sourced goods, before re-distribution to other stages in the supply chain. They are termed 'national' because they serve the whole of the UK from the one site. They are normally associated with suppliers to the retail industry, particularly importers of electrical goods, beers/wines/spirits and clothing, who require facilities to consolidate goods from multiple origins before re-distribution to either a Regional Distribution Centre (RDC) or direct to an end user (retail outlet).

3.2.4. Regional Distribution Centres (RDC) are similar to NDCs in that they receive, hold and then re-distribute goods to other stages in the supply chain, normally multiple retail outlets. However there are a number of important differences. They have a regional hinterland, defined by suppliers and customers. More importantly their primary

role is to consolidate and re-distribute goods in shorter periods of time, rather than acting as inventory holding locations. Consequently dwell times are much shorter at an RDC.

3.2.5. Normally, goods are received in 'bulk' from suppliers', NDCs, or direct from manufacturers, and then split into smaller consignments for re-distribution in mixed loads i.e. with other smaller consignments, often within 24-48 hours. Consignments are processed within the building for onward distribution, requiring unloading and re-loading facilities on opposite sides of the same unit ('cross docking'). RDCs will receive inward goods from a larger number of origins, whereas a NDC will generally have fewer sources of supply. They are therefore normally associated with retailers. Some retailers will also have NDCs alongside a network of RDCs. A NDC associated with a retailer is generally holding slower moving lines or goods with long supply lead times.

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

3.2.7. Both NDCs and RDCs are generally associated with suppliers and retailers. Manufacturers located in Britain 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 a manufacturer is located on a site with limited space for holding inventory, they would store goods at an off-site warehouse before re-distribution to the next stage in the supply chain. Also, where a manufacturer has a number of factories, they may decide to consolidate their goods at one centrally located distribution centre before transport to the next stage in the supply chain.

3.2.8. In addition, some manufacturers have decided to locate their storage facilities close to their customers, in order to meet their strict JIT ('just in time') delivery arrangements. This is particularly so in the automotive industry. The important point to note however is that we would expect demand for distribution warehousing, and hence occupiers, to be mainly associated with suppliers and retailers (or their appointed logistics providers) i.e. those companies bringing goods into the area.

3.2.9. The management of a distribution centre can either be undertaken 'in house' by the supplier/retailer (so called own account), or out-sourced to a third party logistics operator. Normally such out-sourcing involves a logistics operator providing a package of supply chain services, covering the actual operation of the distribution centre, inventory monitoring, any other 'added value' activities (packaging, labelling) and the associated transport operations. The contracting supplier/retailer will often retain overall strategic control of the supply chain, including overall strategic planning (the structure of the supply chain, number/location of distribution centres and modal choice etc.), controlling inventory levels and purchasing policies. However in many large supply chains, particularly those associated with retailers, some distribution centres are retained in house in order to 'benchmark' the performance of those managed by third party logistics operators.

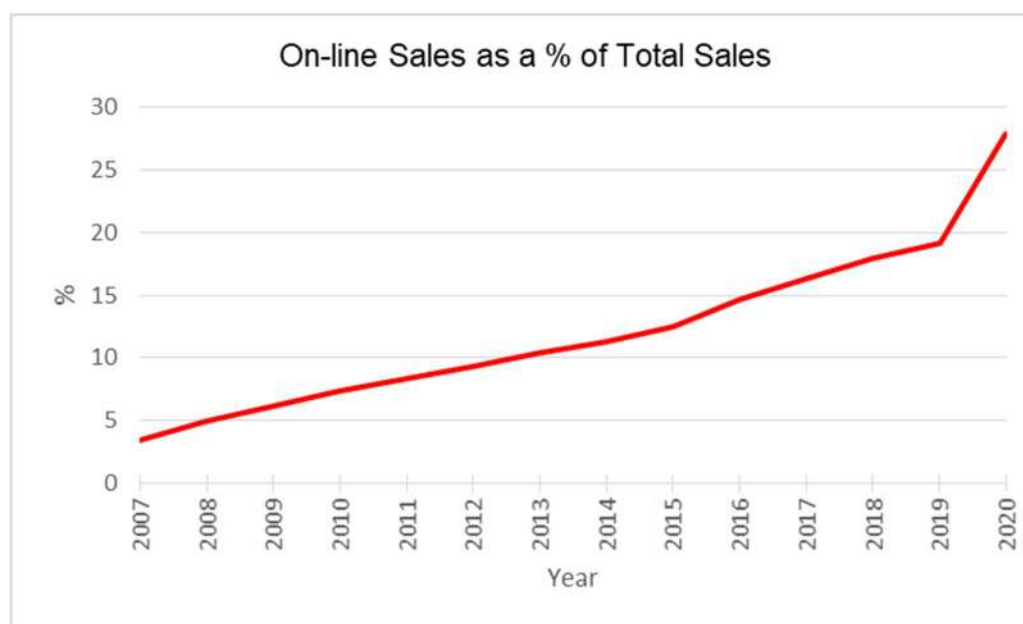
3.3. Logistics Sector Trends

3.3.1. Trends in the retail industry have driven the changing nature of logistics. Goods are now ordered by retailers from manufacturers and suppliers on a just in time (JIT) basis when required rather than in anticipation of demand. Consequently, the responsibility of holding inventory to ensure product supply has been placed with manufacturers and suppliers, rather than the retailers.

3.3.2. E-Commerce has revolutionised the sector in recent years. The effects have particularly been seen in the UK as a high proportion of the population have access to Wi-Fi and are within easy reach for delivery.

3.3.3. ONS data shows that the proportion spent **online increased to 27.9% of total spending in 2020**. This compares with 19.2% in 2019 and 18.0% reported in 2018. Whilst full year figures are not yet available for 2021 in **Q3 2021 online spending accounted for 25.9% of total spending**. Overall on-line retailing has been steadily increasing since 2007 but the pandemic has caused a steep acceleration of this trend (see **Figure 3.1** which illustrates this point showing the proportion of on-line sales on an annual basis).

Figure 3.1: Online Retail Sales



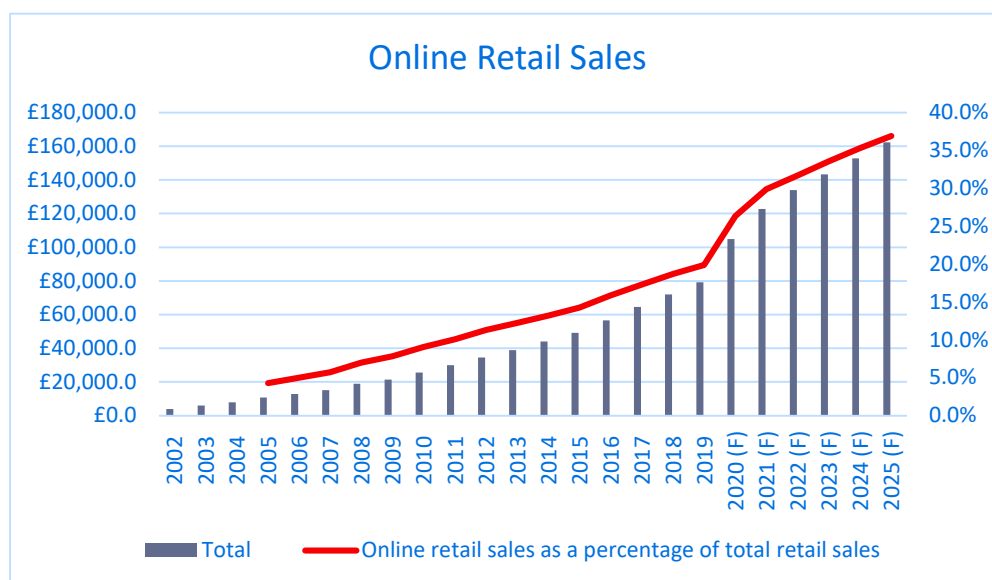
Source: ONS

3.3.4. Most commentators are of the opinion that the pandemic has generated a step-change in the level of on-line retail, changing consumer behaviours and spending patterns. The consolidation seen across the retail sector has seen those businesses which can meet the on-line demand survive and grow, whereas those which are less able to adapt have been unable to compete. Retailers have invested significantly in their on-line presence and supporting infrastructure and consumers have also removed barriers to access through necessity. These factors

mean that the acceleration of the trend towards e-commerce will result in a long term economic restructuring as short term increases in market penetration are not expected to be significantly reversed.

3.3.5. Latest forecasts from Forrester Analytics illustrate the long term trend and forecast over the next five years (Figure 3.2).

Figure 3.2: On-line Retail Sales Forecast



Source: Savills/Forrester Analytics 2021

3.3.6. The forecast suggests that by 2025, online retail sales will make up to around 37% of total sales, equating to £162.27 billion (Forrester Analytics 2021 Online Retail Forecast – Western Europe, April 2021).

3.3.7. By way of example of the long term restructuring which is taking place, ASDA recently announced that 3,000 in-store jobs are at risk as part of a re-structuring of the business towards greater on-line provision as a result of a shift in demand towards grocery deliveries. However, the business plans to create 4,500 new roles to support the growth of their on-line operation.

3.3.8. The growth in on-line retail and the recent steep acceleration of this trend has direct implications for the level of demand seen from the logistics sector in terms of both the type and quantity of space required. According

to research by Prologis², three times as much warehousing space is required for online fulfilment compared with store-based fulfilment for a number of reasons:

- i. all inventory is stored in a warehouse;
- ii. digital storefronts offer more product lines;
- iii. higher volatility in sales patterns requires more stock-holding;
- iv. parcel shipping requires more space than pallet shipping; and
- v. E-fulfilment operations often include other activities such as reverse logistics (returns) and assembly.

3.3.9. Highly specified, bespoke units, with particular requirements in relation to configuration, height and scale are therefore necessary to meet the requirements of on-line retailers.

3.3.10. It is estimated that every additional €1bn (£739,480,449) of online sales results in on average an additional 72,000 sq. m (775,000 sq. ft.) of demand for warehouse space³. This equates to **a requirement for 97,366 sq. m (1,048,039 sq. ft.) of additional warehouse space for every £1bn of online sales.**⁴

3.3.11. According to the latest forecasts, there will be a total of £162.27 billion in online sales in the UK in 2025, compared to a total of £104.83 billion in 2020 (an additional £57.44 billion). Using the figures from Prologis, this suggests that there could be **a requirement for an additional 5,600,000 sq. m (60.2 million sq. ft.) of new warehouse space nationally**, purely to meet the demand of the online retail sector by 2025.

3.3.12. The structural change in retail has significantly impacted the UK warehouse market, as the occupier base has changed substantially. Whilst third party logistics operators have continued to be an active acquirer of space, the rise of on-line retail providers acquiring space has been notable. The rise in online retail has also stimulated the need to facilitate “last mile” deliveries. Consequently, the demand for smaller units on the edge of conurbations has increased dramatically. Van registrations have risen 107% in ten years. As online sales and van registrations increase, the demand for last mile facilities will also rise.

3.3.13. Customers now expect delivery of goods within increasingly short time frames, with next day delivery and even same day delivery commonplace and this has reformed the way in which supply chains are managed. On-line retailers are increasingly competing on speed of delivery to win customers and this comes at a considerable extra cost in terms of additional warehousing requirements and delivery fleets, which can only be absorbed by the largest companies. The transfer of delivery costs from the consumer to the retailer means that location and accessibility to the consumer is increasingly important.

² Forever Altered: The Future of Logistics Real Estate Demand (March 2021, p.3)

³ Prologis, ‘European E-Commerce, E-Fulfilment and Job Creation’, [online] <https://www.prologis.com/news-research/global-insights/european-e-commerce-e-fulfilment-and-job-creation> (October 2015).

⁴ £1 GBP = €1.3523 at date of publication of Prologis research (1st October 2015).

3.3.14. Despite this structural change, the market remains diverse with demand coming from a range of occupier groups.

3.3.15. Sufficient and well-located logistics floorspace is also vital to the continued growth of the manufacturing sector. Manufacturers, based on the long term average, account for 24% of all of the new leases signed for B8 warehouse space in the UK⁵. Investment in this sector causes a ripple effect of occupiers seeking to take logistics space close to manufacturing hubs in order to satisfy supply chains. Research from Savills suggests that **for every £1bn of manufacturing investment an additional 175,000 sq. ft. (16,300 sq. m) of warehouse space is required.**

Impact of COVID-19 & BREXIT on Logistics

3.3.16. The global Covid-19 pandemic has had an unprecedented impact on businesses worldwide. It has highlighted the importance of supply chain resilience to all sectors of the economy and in particular the inextricable link between retail and the supply chain. The impacts are yet to be fully appreciated as the situation continues to unfold.

3.3.17. The dual impact of COVID-19 and BREXIT has brought the importance of the logistics sector to the forefront. Reliance on on-line retail, distribution and storage of essential supplies, together with border closures, delays and stock shortages have all highlighted the essential role that distribution (and manufacturing) play in supporting the economy.

3.3.18. In the UK, consumer demand for items from grocery and online retailers increased significantly as a result of the pandemic, which has impacted positively on the UK logistics property market. The lockdown procedures for COVID-19 have caused food retail supply chains in particular to reconsider their supply chain networks after huge spikes in demand left supermarkets devoid of multiple stock items. This has translated into a significantly increased demand for warehouse space with 2020 and 2021 (year to date) being record-breaking years for logistics take-up by all measures (take up is analysed in more detail in Section 6).

3.3.19. The acceleration of the trend towards e-commerce is forecast to give rise to a long term step change in consumer behaviour which will have structural implications for the logistics sector in terms of the amount and type of space required. Where there were barriers to on-line retail, these have by necessity been removed (for example retailers have made supply chain investments; consumers have increased access and knowledge of on-line platforms; sectors have increased their penetration of the on-line market). As access to on-line retailing has become easier and quicker, e-commerce penetration will continue to rise and the demand for warehouse space will rise exponentially as a result.

3.3.20. In order to maximise the economic potential of the logistics sector, it is vital for the property market to provide the appropriate accommodation to meet the needs of companies seeking efficiency and cost savings in terms of their distribution requirements (which also results in increased competition and lower costs for the consumers and manufacturing businesses). Developers of distribution warehouses are increasingly having to respond to a more

⁵ Savills Research

sophisticated and demanding client base, providing users with reliability and flexibility in their product. Their requirements therefore are highly diverse, dependent on type and scale of use. **It is therefore particularly important that a range of different sites are available which offer flexibility in terms of scale and configuration of unit.**

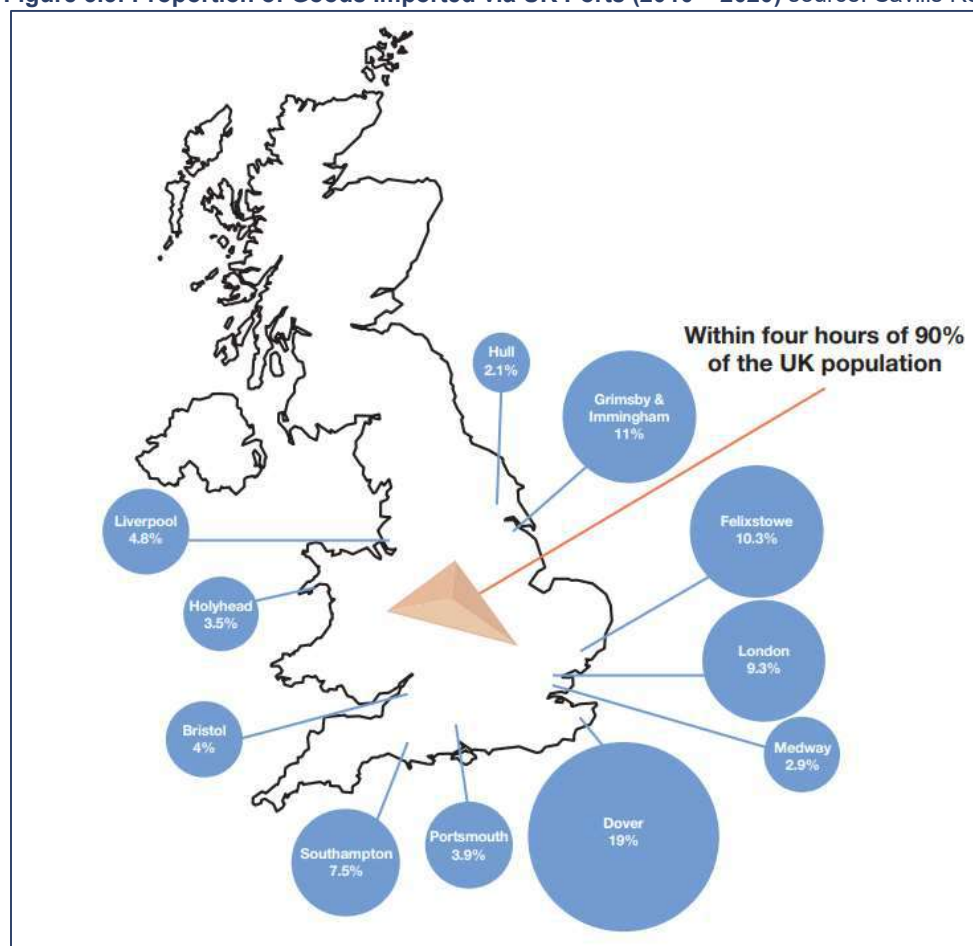
Port-centric Logistics

3.3.21. The 'golden triangle', defined as those areas of the Midlands where the majority of the UK's population can be reached within a four-hour HGV drive time, has traditionally been the focus for occupiers seeking National Distribution Centres (NDCs). This model sees goods received, principally from the ports, to a central hub and then re-distributed onwards to the consumer, often via Regional Distribution Centres (RDCs) and Last Mile facilities (units located close to the urban conurbations). There is however a growing trend towards 'port-centric' logistics. Occupiers are seeking to locate warehousing near to the inbound port for onward distribution to either the southern or northern markets. This approach can have a number of benefits:

- Quicker access to the end consumer (occupiers with warehousing close to ports are able to reduce the number of handling stages throughout the storage and distribution process when serving markets close to the ports, for example London and the South East);
- Relatively cheaper property costs compared to a single larger unit in the golden triangle;
- Plentiful and cost effective labour;
- Space to expand; and
- Environmental benefits by reducing CO2 emissions per mile.

3.3.22. The graphic below illustrates the proportion of goods imported via each of the ports.

Figure 3.3: Proportion of Goods Imported via UK Ports (2010 – 2020) source: Savills Research



Source: Savills Research

3.3.23. ***There has also been an increased demand for storage within easy reach of the ports as a result of the supply chain disruption seen as a result of COVID-19.*** Businesses are seeking to build resilience into their supply chain by increasing stock holding at the ports in order to mitigate future disruptions. Land at J25 Bar Hill is well-placed to contribute towards meeting this increased demand, being easily accessible to the East Coast Ports, as well as to the traditional Midlands logistics locations via the A14.

3.4. Manufacturing Sector Trends

3.4.1. The UK manufacturing sector, led by the advanced manufacturing sector, has witnessed a renaissance over the last decade. Despite the long term structural decline in traditional manufacturing industries in the UK, which has been ongoing since the 1970s when manufacturing contributed 25% of UK GDP, the UK is currently the ninth largest manufacturing nation in the world. Over the past five years, the UK has attracted £148bn of private

manufacturing investment, creating demand for 26m sq. ft. (2.4m sq. m) of warehouse space from the sector (European Manufacturing Outlook – Autumn 2020, Savills).

3.4.2. The growth in manufacturing has been dominated by 'cleaner' manufacturing and the market is increasingly moving towards 'advanced manufacturing', driven by the UK's R&D capabilities. The Government's aim is to rebalance the economy from low value, mass production manufacturing to high value, advanced manufacturing and engineering. There has been a shift in production from low to high productivity goods; improvements in automation and technology; increased investment in R&D, and a more integrated global economy. Key sectors are automotive, electronics, aerospace, textiles, food and drink, and pharmaceuticals.

Impact of COVID-19 and BREXIT on Manufacturing

3.4.3. The recently agreed trade deal with the EU removed a significant amount of uncertainty for business. There will be a period of adjustment which will see occupiers adjusting their supply chains to gain greater operational efficiencies. The additional tariffs and associated administrative burden means that overall, trade with the EU is likely to be negatively impacted.

3.4.4. Both Brexit and the current COVID-19 issues have reinforced the trend of on-shoring: the repatriation of manufacturing, particularly for critical components, to reduce the length of supply chains (and thereby risk of interruption in the supply of key components), to more easily maintain control of quality, and to ensure key industries maintain their intellectual property and production capacities against international competition. These are recognised as being not of only commercial interest but of national security concern. According to the Institute for Supply Management's (ISM) July survey, 20% of firms are planning or have already begun to re-shore or near-shore some operations (European Manufacturing Outlook – Autumn 2020, Savills).

3.4.5. In the short term, any fall in consumer spending caused by the wider economic crisis will have negative impacts for the manufacturing sector. Ultimately production is driven by consumer demand. The impact of the pandemic on the aviation industry will have negative impacts on production in this sector, with companies such as Rolls Royce already announcing significant job losses. There has been a fall in global demand for new cars and this has also impacted automotive production, albeit growth has now returned to the sector.

3.4.6. Notwithstanding this, the manufacturing sector overall has begun to recover and has been less impacted by the lockdowns than other sectors once production adapted to incorporate the new health and safety protocols. Whilst the manufacturing sector was significantly impacted by the uncertainty of Brexit, and by the COVID lock downs and restrictions, firms have in many cases adapted to new working practices and long term trends are considered to be positive.

Implications for the property market

3.4.7. Key implications in relation to the logistics sector are:

- i) Significantly increased (and increasing) levels of demand: particularly as a result of e-commerce, but

also due to the growth of the manufacturing sector, and other factors such as Brexit.

- ii) Requirement for increasingly large plots and correspondingly quicker absorption rate of sites: the growth of the on-line retail sector as well as a continuing shift away from manufacturer/suppliers delivering direct to their customers and the emergence of RDCs and NDCs, which dominate the large distribution warehouse market, and which have seen a continuing rise in the average size of buildings, has led to an increase in plot sizes necessary to accommodate larger buildings.

For example, a RDC in the early 1990s might typically have been 13,900 sq. m (150,000 sq. ft.), which would require a plot of c. 3.04 ha. RDCs are now likely to be in the range 32,480 sq. m – 46,400 sq. m (350,000 sq. ft. – 500,000 sq. ft.), requiring a plot size of up to 12 – 13 ha⁶. The average size of a modern logistics building has increased 42% since 2007 and now stands at c. 31,587 sq. m. (Savills Research) The trend for larger buildings is illustrated by the graph below at **Figure 3.4**

Figure 3.4 Average Unit Size (source: Savills Research)



- iii) Higher buildings: The long-term trend has been for an increase in eaves heights provided to allow greater occupier flexibility and to maximise building efficiency/cubic capacity (i.e. increased racking capacity, mezzanine floors, often involving substantial investment in electronic technology). Since 2007, the average height of modern distribution buildings has increased from 10.5m to 13.6m⁷.
- iv) Demand for highly accessible locations: the growth of the on-line retail sector has led to a rapid growth in demand for floorspace for larger, often bespoke distribution facilities, in highly accessible locations, as online retailers seek out well-located sites that allow them to compete on fulfilment times.
- v) Growing importance of portcentric logistics: locations easily accessible to inbound ports are increasingly in demand as distributors seek to maximise efficiencies and mitigate against future supply chain disruption.

⁶ Assuming a plot density of 35-40%

⁷ Savills Research

3.4.8. Key Implications in relation to the manufacturing sector are:

- i) Increasing occupier demand: Occupier demand for B2 uses throughout the United Kingdom has increased in recent years. Overall since 2007, over 330 different occupiers have taken units over 100,000 sq. ft. throughout the country. The trend for on-shoring could also lead to further increased demand for UK manufacturing facilities.
- ii) Increase in unit size required: The average size of B2 buildings transacted within the United Kingdom has increased in recent years, rising from 156,779 sq. ft. in 2008 to 281,520 sq. ft. in 2019, highlighting the shifting occupier demand towards larger sized units.
- iii) Growth of Build to Suit: Manufacturers are increasingly seeking built-to-suit units as a large proportion of the second hand stock on the market is not capable of accommodating modern occupier requirements. In 2009 over 50% of all space transacted was second hand space and 30% was built-to-suit. In 2019 the balance shifted with just 27% of space transacted by manufacturers being second hand and 56% being built to-suit. Furthermore, in 2019 the average deal size for built-to-suit units was far higher than those which were second hand, reaching 475,265 sq. ft. and 211,314 sq. ft. respectively.
- iv) R&D focus: Increased demand for high quality premises with excellent linkages to educational and training facilities. Increasing demand from companies within key growth sectors.

3.5. Conclusion

3.5.1. There has been a structural change in the retail and logistics sectors as a result of the structural change in the retail and logistics markets and the resultant acceleration of the growth of on-line retail. There is a strong link between the growth in on-line retail and the amount of warehousing space required. This is especially the case for the largest units, and this has driven record breaking levels of take up in 2020 and so far in 2021, as will be demonstrated by the analysis of market indicators in the following section. Using the latest forecasts suggests that, nationally, there will be a requirement for an additional 5,593,054 sq. m (60.2 million sq. ft.) of new warehouse space, purely to meet the demands of the online sector by 2025.

3.5.2. The size of buildings required (floorspace and height), particularly by the logistics sector, is increasing as operators seek to maximise operational efficiencies and to account for changing trends in configuration. As a result of increased market demand and the larger scale of plots required, sites which are available are being taken up more quickly by fewer buildings and this has significant implications for the amount of land required in order to ensure sufficient market choice and continuity of supply.

3.5.3. Demand from the manufacturing sector is also for increasing unit sizes and an increase in land requirements as occupiers seek bespoke buildings.

3.5.4. Whilst the pandemic and BREXIT have created market uncertainty in some sectors, occupiers have responded to this by increased stockholding and 'on-shoring' and trends in the manufacturing and distribution sectors at a national and regional level show significantly increased demand and a corresponding fall in supply over the last 18 months. The importance of locations within close proximity and easy accessibility to the ports is a growing trend which will directly impact on demand within locations in the East of England and along this stretch of the A14, such as the subject site.

3.5.5. Market trends all point to a significantly increasing demand for land overall, for larger, strategic scale sites which are capable of accommodating the largest occupier requirements, and for land within easy reach of the principle ports. The proposals at Bar Hill directly respond to these market trends.

4. National and Regional Market Indicators

4.1.1. This section sets out an assessment of the key market indicators at a national and regional level in order to provide further context to the assessment of demand (and need) for the proposals and for strategic employment sites overall.

4.1.2. Data is sourced from Savills Research, which monitors and analyses take up and supply of B2/B8 units of 9,290 sq. m (100,000 sq. ft.) plus on a nationwide and regional basis. The analysis was undertaken in November 2021 using data to Q3.

UK Take-up

4.1.3. Take-up is analysed as a key market indicator. Take-up is often used as a surrogate for demand but that can be misleading, particularly where land supply or availability of buildings is constrained. Take-up is, in effect, the minimum manifestation of demand and supply, but take-up will be constricted in circumstances where demand (in quantitative terms) exceeds supply and (in qualitative terms) where the nature of demand (location, use, scale, quality) is not capable of being met by the actual supply of employment land and buildings available. As will be considered below, this is an acute problem nationally and regionally.

4.1.4. Over the course of 2020, take up was **80% above the long term average**, with the highest levels of take-up ever recorded on the basis of both total unit area and number of transactions: over 4.7 million sq. m (50.1 million sq. ft) of take-up in total. This trend has continued.

4.1.5. By Q3 2021, 38.06 million sq. ft of warehouse space had been transacted through 158 separate units, **already surpassing the average annual take up of 27.75 million sq. ft.** Last year saw 3.6 million sq. m (39 million sq. ft) of space transacted by Q3, which highlights that 2021 is set to be another record-breaking year. The trend is illustrated by the graph at **Figure 4.1** overleaf.

4.1.6. Third party logistics operators continue to be an active acquirer of space as they seek to capitalise on the growth of ecommerce, while simultaneously reaching greater economies of scale (accounting for 26% of total take-up in 2020 and 22% in 2021), the rise in online and budget retail providers acquiring space has also been notable. In 2020 retailers accounted for 48% of the total take-up, increasing to 53% in 2021. In isolation, online retailers have accounted for 38% of take-up so far this year (by floorspace).

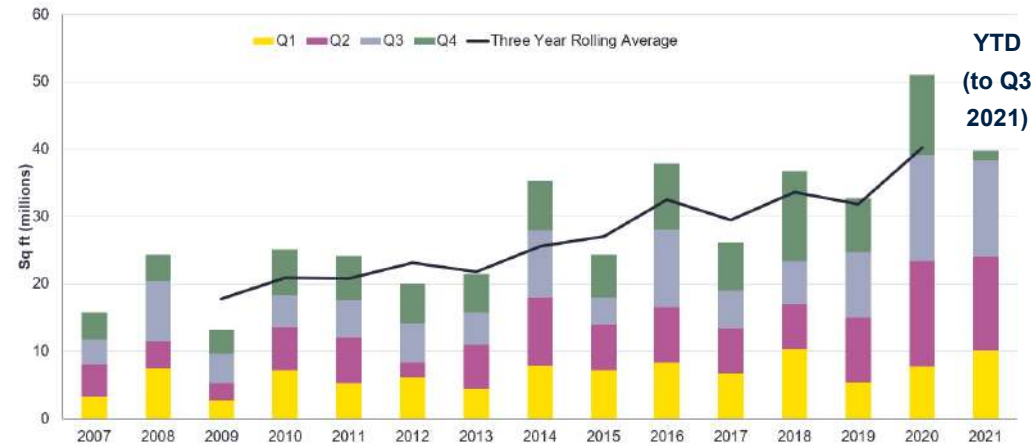
4.1.7. As illustrated by **Figure 4.2**, there is a strong and continued occupier preference for the best quality units, with 31% of space transacted in 2021 has being grade A speculatively developed, and 51% has been grade A. As with other components of take-up, this is also driven by availability of supply.

4.1.8. There was a significant increase in take-up for units over 500,000 sq. ft. in 2020. This size band equated to **44% of total take-up during 2020**, more than the previous two years combined (see **Figure 4.3**, overleaf). Given

the number of requirements currently in the market for units over 500,000 sq. ft., it is expected that the full year figures for 2021 will reflect a similar picture. In total there was 286 million sq. ft. of requirements logged since January 2020: 45% of these were between 100,000 sq. ft. and 300,000 sq. ft., and 33% were above 500,000 sq. ft. as shown by **Figure 4.5**. Given that a unit of this scale would require a site of c. 13 ha (assuming 35% plot density) the impact on the overall land requirement and the speed at which sites can be taken up is clear.

J25 Bar Hill

Market Demand Assessment



Source: Savills Research

Figure 4.3: UK Take-up by Size



Source: Savills Research

Figure 4.1: UK Take-up



Source: Savills Research

Figure 4.4: UK Take-up by Deal Type



Source: Savills Research

Figure 4.5: Requirements Analysis



Source: Savills Research

UK Supply

4.1.9. Strong take-up has meant that supply has fallen at its fastest pace ever recorded and this is illustrated by the graph at **Figure 4.6** overleaf. Supply now stands at 20.13 million sq. ft. across 113 separate units. There is a particularly severe shortage of supply of the best quality Grade A space which now stands at just 6.91 million sq. ft., the lowest level ever recorded (**Figure 4.7**). Vacancy rates are estimated to be 3.43% (significantly below the level necessary for market equilibrium). Moreover, given the current levels of supply within the UK market and using the three-year rolling average take-up of 40.19 million sq. ft. there is just 0.5 years' worth of supply of premises left within the whole of the UK.

4.1.10. At present, 73% of the supply by unit count comprises smaller units, those within the 100,000-200,000 sq. ft. size band.

4.1.11. Overall, supply of premises is very constrained and does not match demand in relation to the size or quality of units available.

J25 Bar Hill

Market Demand Assessment

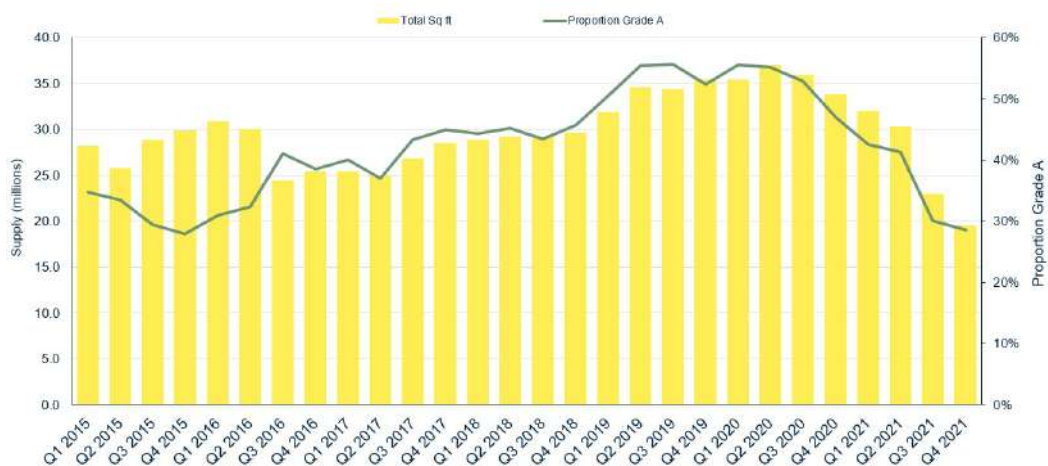


Figure 4.6: UK Supply



Source: Savills Research

Figure 4.7: Grade A Supply as a Proportion of UK Supply



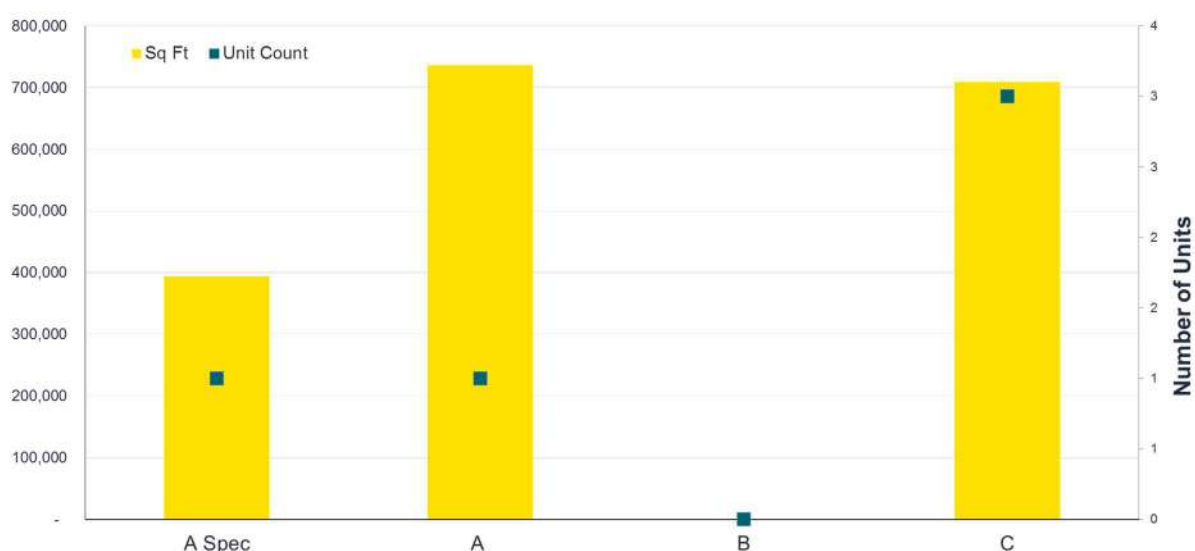
Source: Savills Research

East of England Market Overview

4.1.12. The East of England has seen a significant increase in occupier requirements over the course of the last 12 months, driven by the increasing awareness of the benefits which the location can offer in terms of accessibility and proximity to the East Coast Ports, London and the South East and Midlands markets. Take up in the region fluctuates with availability of supply.

4.1.13. As illustrated at **Figure 4.8** below, there are currently only two Grade A units available in the region, one of which is under offer and due to complete shortly (Peterborough 736). On completion of this letting the vacancy rate in the region will fall to 2.81%.

Figure 4.8: East of England Supply (Built Stock)



Source: Savills Research

4.1.14. According to the long term average annual take-up there is currently **1.08 years' worth of supply (of buildings) in the market.**

4.1.15. There are currently four units under construction in the region: a single unit under construction within the 100,000-200,000 sq. ft. size band; two units under construction within the 200,000-300,000 sq. ft size band, and a single unit under construction within the 300,000-400,000 sq. ft. size band. Unit B Delta Park is the largest unit under construction comprising 307,500 sq. ft., being developed by Trebor Developments and Hillwood.

4.1.16. All space taken up during the first half of 2021 was either speculatively developed, or new build to suit floorspace (**Figure 4.9** below). New speculatively developed space accounted for the largest proportion of take-up in 2020 (68%) - the remaining 32% was build-to-suit space.

Figure 4.9: East of England Take up (by specification)



Source: Savills Research

4.1.17. No second-hand space has been taken in the region during the course of 2021, highlighting occupier preference towards better quality units. The two recent speculatively developed units at Peterborough Gateway were let in Q1 2021, shortly after completion, to MH Star and Oatly. The short void period highlights the continued occupier demand within the region. According to the five-year annual average, 24% of space transacted per annum is second-hand space, 18% is newly speculatively developed space with the remaining 58% being built-to-suit space.

4.1.18. Take-up in H1 2021 has reached 901,000 sq. ft through three separate transactions, **117% above the long-term H1 average**. Prime rents in the region now sit at £6.00 psf. The shortage of new space and occupier preference towards better quality units will continue to bring reduced incentives and positive rental growth.

4.1.19. In terms of deal count, 2021 saw 33% of deals being within the 300,000-400,000 sq. ft. size and 67% within the 200,000-300,000 sq. ft. size band. There has been an increase in size of units taken up in comparison to the long term average trend.

4.2. Conclusions

4.2.1. Key points from the analysis are:

- Record-breaking levels of take-up have continued throughout 2020 and 2021.
- Demand is increasingly for **Grade A floorspace** and there is also a long term trend nationwide towards demand for **larger units**.

- The majority of available premises are at the smaller size ranges and demand for the largest units will therefore be via build to suit options where serviced sites with planning permission are available.
- Strong demand and rapid take up has resulted in a **severe shortage of supply of premises** nationwide (**c. 1 years supply**). There is a particularly severe shortage of supply of the best quality Grade A space which now stands at just 6.91 million sq. ft., **the lowest level ever recorded**.
- **The East of England has seen a significant increase in occupier requirements** over the course of the last 12 months, driven by the increasing awareness of the benefits which the location can offer in terms of accessibility and proximity to the East Coast Ports, London and the South East and Midlands markets.
- Take-up at a regional level is more than double the long term average at H1 2021, but this does not reflect the true scale of demand, being constrained by a **lack of availability of land and premises** as demonstrated by the current vacancy rate which is well below the level required to maintain market equilibrium.

5. Market Area Assessment Methodology

5.1.1. The methodology of the market assessment is set out below.

Market Assessment of the Proposals

5.1.2. Occupier demand does not follow local authority boundaries and the market in which a site may be competing is often much larger, particularly for strategic scale sites. In order to assess competing supply and demand, it is therefore necessary to define an approximate property market area. This is the area which occupiers seeking a building or site at Bar Hill may also consider as a potential location.

5.1.3. The extent of the market area is defined by the key demand drivers for the proposals, which will dictate those locations that will compete with the subject site for occupier requirements. The attributes of J25 Bar Hill which will drive demand can be summarised as follows:

- **Highly accessible location**, adjacent to (the recently improved) Junction 25 of the A14;
- Central location from which to serve **Cambridgeshire, the Midlands and the South East** based on strong east-west connectivity via the A14 and north-south via the A1 and M11;
- Excellent **connectivity with the East Coast ports** with direct access to Felixstowe via the A14;
- **Strategic scale** opportunity which offers occupiers flexibility in terms of scale and configuration of units including local demand and large-scale inward investment opportunities;
- **Ability to accommodate the largest requirements**, up to 92,900 sq. m/1 million sq. ft which are increasingly a significant component of demand nationally;
- Proximity and accessibility to significant **customer base and labour supply** within Cambridgeshire;
- For occupiers within the **advanced manufacturing sector**, access to a highly skilled labour pool and potential to maximise linkages to numerous further education and R&D establishments throughout Cambridgeshire, including the Institute of Manufacturing at the University of Cambridge;
- Ability to maximise **supply chain linkages within key sectors in Cambridgeshire** (Automation & Digital Manufacturing, Electronics, Food Processing, Robotics, Composites & polymers, Energy, Clean Manufacturing, High Value manufacturing and Precision Engineering) as well as the East Midlands via the A1 and A14.
- Excellent accessibility to London Stansted Airport.

5.1.4. Occupiers make locational decisions based upon drive times between incoming goods locations (for example the ports) and onward markets (or other facilities within their distribution network). The accessibility of J25 Bar Hill is illustrated at **Figure 5.1** overleaf which shows both a 2 hour (dark pink) and 4 hour (light pink) HGV drive time isochrone from J25 Bar Hill⁸. A significant area of the UK is within a 2 hour HGV drive time, including the East of England, much of the East and West Midlands, London and the South East. Within a 4 hour HGV journey (the maximum time which can be travelled in one journey) most of England and Wales can be reached making this a very attractive location for occupiers.

5.1.5. Based on the site's characteristics and credentials, and in the context of the market trends assessed at Section 3, demand will be seen from a variety of occupiers including:

- i) NDCs (nationwide requirements for strategic scale logistics facilities in highly accessible locations).
- ii) RDCs (occupiers seeking to serve the East of England/East Midlands and northern areas of the South East market)
- iii) Local B8 occupiers who will benefit from the site's excellent connectivity;
- iv) Advanced manufacturing occupiers seeking high quality bespoke facilities, including both inward investment and existing occupiers seeking to expand.

5.1.6. The site is able to offer a range of units to meet occupier demand from the identified sources of demand.

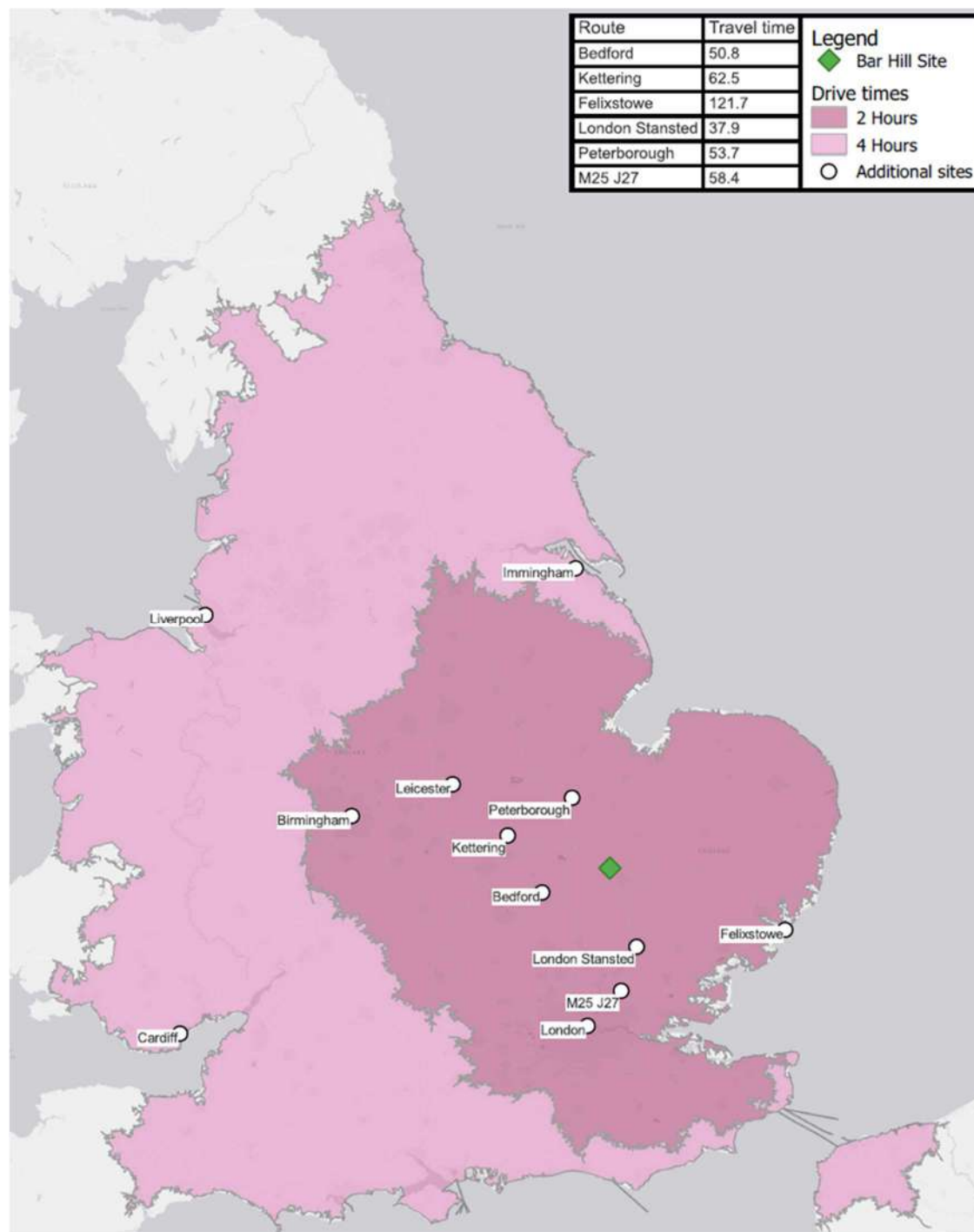
⁸ The 2 and 4 hour HGV drive times have been calculated on the general road fixed speeds and do not take any traffic into account or time of day.

J25 Bar Hill

Market Demand Assessment



Figure 5.1: Drive Time Map (2 hour and 4 hour HGV isochrones)



Source: Savills Maps

Market Area Definition

5.1.7. Occupiers make locational choices based on the accessibility and drive times to/from their customer base and inward freight locations. Competing locations are therefore generally focused along key transport routes. Occupiers in the B8 sector can be footloose to a certain extent. However, they are driven by cost efficiency based on their supply chain dynamics. Whilst relatively wide search areas might be initiated by occupiers, they inevitably get narrowed down once the above dynamics are taken into account. The accessibility of the site to UK markets is illustrated at **Figure 5.1** above.

5.1.8. The core search area specified will vary between occupiers, depending on individual business needs, locations of suppliers or retail stores etc. Occupiers with requirements for the largest units (46,500 sq. m plus and particularly 92,900 sq. m plus) will specify a wider search area, driven in the main by necessity as a result of the severe undersupply of sites and premises of this scale nationally. This is evidenced by a number of nationwide current requirements of this scale.

5.1.9. Manufacturing occupiers are generally much less footloose than those in the B8 logistics sector. A manufacturing business would be unlikely to locate far from their core search area due to greater drive times to market, suppliers and workforce. In order to take a comprehensive approach we have used the larger, B8 catchment area to inform the market area assessment.

5.1.10. A **Core Market Area (CMA)** and **Wider Market Area (WMA)** have been defined in this case in recognition of the very large search areas specified by occupiers seeking the largest units. Sites and premises within the CMA (shown in **blue** on the plan at **Figure 5.2**) will compete with the proposals for occupier requirements of all scales and includes Cambridge, Huntingdon, Peterborough and Bury St Edmunds. The CMA includes the A14 corridor from Huntingdon to Bury St Edmunds and the A1 corridor from Peterborough to Biggleswade.

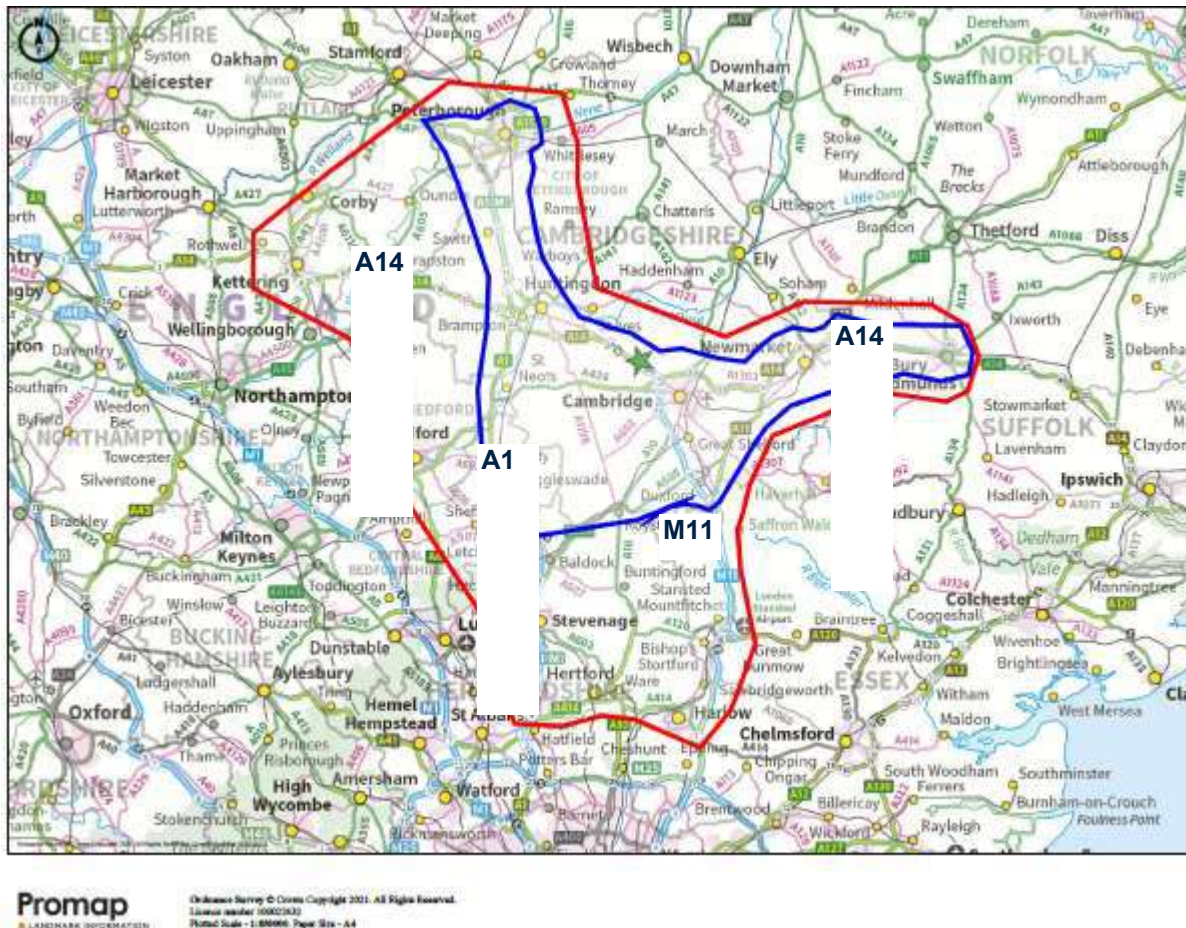
5.1.11. Drive time distances to the East Coast Ports, London and the Midlands are comparable within the CMA and locations within this area will allow occupiers to serve Cambridgeshire (for local occupiers), as well as to maximise wider linkages to the ports and onward destination including London and the Midlands.

5.1.12. As the scale of unit required increases, so too will the search area and locations within the WMA are those which would compete with the proposals for occupier requirements in excess of 46,500 sq. m. This is predominantly a function of the lack of supply of land and premises, which is particularly acute in relation to the larger size ranges. Occupiers are therefore forced to adopt a wider search area.

5.1.13. The WMA shown in **red** at **Figure 5.2** includes the A14 to Corby and Kettering; the M11 corridor to Junction 7; the A1(M), and Bedford, and broadly reflects a 60 minute drive time from the site along key distribution routes and locations within this area are therefore able to serve similar markets and fulfil a similar role within a wider network of logistics facilities. J25 Bar Hill offers occupiers similar credentials to sites within the CMA and WMA in terms of accessibility to markets and key transport routes (A14, M11, A1).

5.1.14. Occupier requirements are unique and, whilst it is not possible to capture every potential search area, the defined areas represent a realistic competing area for the majority of occupiers based on the key attributes of the proposals and the relative accessibility and proximity to markets and freight routes.

Figure 5.2: CMA and WMA Plan



5.1.15. In order to ensure a clear and cohesive approach for the purposes of supply analysis, the area of assessment has been broadened to include the relevant local authority areas which fall in whole or in part within the defined market areas (CMA and WMA). Areas within the PMA but outside the WMA boundary are unlikely to compete for occupiers with J25 Bar Hill. The local authorities included within the assessment are shown at **Figure 5.3** below (which for the purposes of this assessment is referred to as the **Property Market Area, (PMA)**).

Figure 5.3: Property Market Area Plan



Source: Savills Maps

Methodology

5.1.16. The assessment includes the supply of, and demand for, units of over 9,290 sq. m (100,000 sq. ft) in the PMA, or sites which can accommodate a unit of at least this size. The relevant data for the CMA and WMA is then presented separately. Whilst the majority of competing occupier demand will be focused on the CMA and WMA, the PMA is used as the starting point in order to provide a comprehensive approach to the analysis of supply and demand.

5.1.17. The relative supply position has been assessed in both quantitative and qualitative terms. Available supply (buildings and those sites with planning permission for units in excess of 9,290 sq. m) has been assessed in the first instance. The pipeline of sites allocated or benefiting from draft allocations, but without permission, has then also been reviewed.

6. Market Area Demand

6.1.1. This section considers take-up within the market assessment areas. As noted in relation to the national and regional markets, take up is a surrogate for demand and will not accurately reflect true levels of demand where supply is constrained, which is the case across much of the market area; whilst take-up is a useful measure, true levels of demand may well be higher.

6.1.2. Take-up of units within the market assessment areas has been compiled using Savills internal database of transactions.⁹

6.1.3. Total take-up within each area by year is set out at **Figure 6.1**. Our analysis includes data from Q4 2016 – End of Q3 2021 inclusive.¹⁰ In total in the PMA, there has been **2.17 million sq. m** (23.4 million sq. ft) of take up over the assessment period, which equates to an average of **434,737 sq. m** (4.7 million sq. ft) per annum over the last five years.

Figure 6.1: Analysis Area Take-up by Year

Year	PMA Take up (sq. m)	WMA Take up (sq. m)	CMA Take up (sq. m)
2016 (Q4)	239,392	204,181	45,058
2017	392,441	356,673	244,489
2018	443,853	433,026	83,471
2019	327,909	279,416	118,688
2020	419,432	372,969	222,058
2021 (Up to end of Q3)	350,659	245,751	56,764
Five year total	2,173,687	1,892,018	770,527
Five year average per annum (Q4 2016 - Q3 2021)	434,737	378,404	154,105

6.1.4. The average size of unit transacted (2016-2021) is broadly consistent within the assessment areas, ranging from 26,508 sq. m in the PMA to 28,239 sq. m in the Wider Market Area (285,340 – 303,962 sq. ft.) as shown at **Figure 6.2**, below.

⁹ Savills Research collects and analyse data on key indicators (relating to units of 9,290 sq. m and above) including take-up, supply of built stock, development pipeline, and speculative development. The supply and take up database is updated on a monthly basis coordinating input from local agency teams around the UK and cross referencing nationwide and regional databases and constant monitoring of news releases.

¹⁰ Analysis undertaken in November 2021. Complete figures for 2021 take-up were therefore not available.

Figure 6.2: Transaction Volumes and Average Unit Size

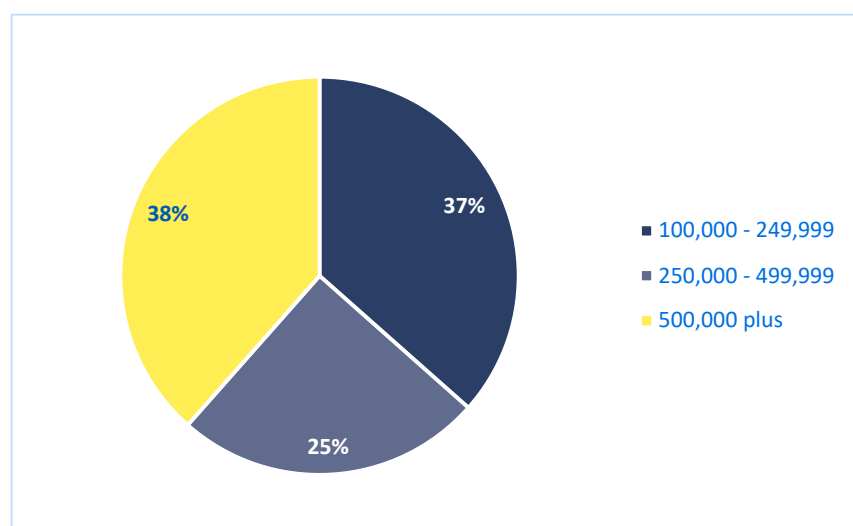
Assessment Area	Total transactions	Average Unit Size (sq. m)
Property Market Area	82	26,508
Wider Market Area	67	28,239
Core Market Area	29	26,570

6.1.5. Take-up by size band within the PMA is set out at **Figure 6.3** below. The majority of transactions are within the smaller size ranges but the majority of floorspace transacted is within the largest units of 46,451 sq. m (500,000 sq. ft) plus. This is shown graphically at **Figure 6.4**.

Figure 6.3: PMA Take-up by Size Band

PMA Size Band	Transactions	floorspace (sq. m)	% by transactions	% by floorspace
100,000 - 249,999 sq. ft.	52	794,253	63%	37%
250,000 - 499,999 sq. ft.	18	543,252	22%	25%
500,000 plus sq. ft.	12	836,181	15%	38%
Total:	82	2,173,687		

Figure 6.4: PMA Take-up by Size Band (sq. m)



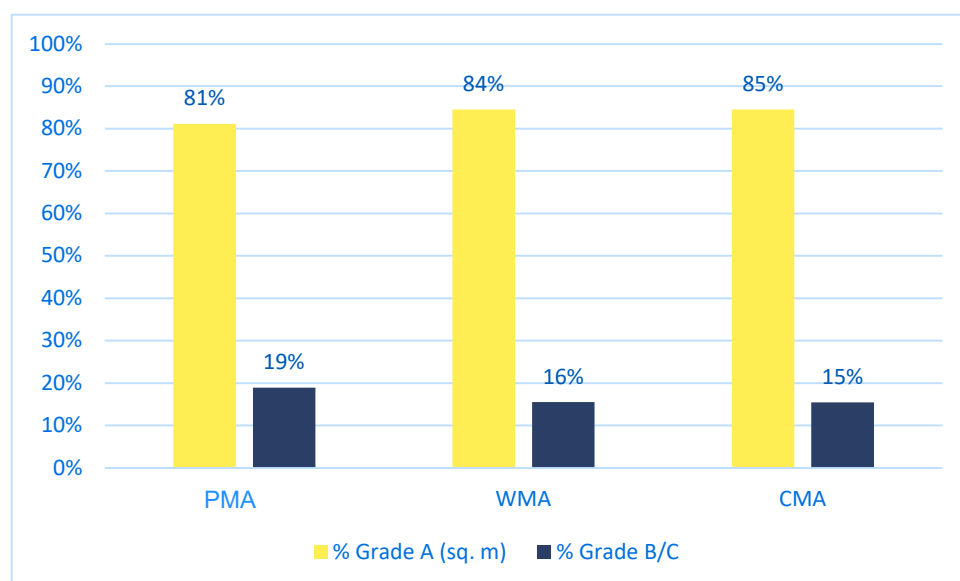
6.1.6. These largest units make up a key component of demand across the PMA. There is a similar picture across the assessment areas, with the relative contribution made by units of this scale being highest in the WMA at 38% of all take up by floorspace (**Figure 6.5**). As noted at the outset, take up is limited by availability of supply and this is very relevant in relation to the take-up of the largest units, where supply is particularly constrained.

Figure 6.5: Take up by Size Band and Assessment Area

Assessment Area/ Size Band (sq. ft)	PMA %	WMA %	CMA %
100,000 - 249,999	37%	37%	36%
250,000 - 499,999	25%	19%	29%
500,000 plus	38%	44%	35%

6.1.7. The vast majority of take-up within the assessment areas has been of Grade A units (**Figure 6.6**). This ranges from 81% of take up by floorspace within the PMA to 85% within the CMA. There is a strong preference for the highest quality units.

Figure 6.6: Take up by Grade and Assessment Area



6.1.8. As will be outlined at Section 7, this is a function of the fact that the majority of available supply is comprised of plots of land available for build to suit opportunities, but also that meeting the increasing and changing demands of both the logistics and advanced manufacturing sectors necessitates the best quality, and often bespoke buildings. Second-hand units are often unable to meet occupier requirements in terms of height and yard size/configuration amongst other things.

6.1.9. By area, the majority of take up has been within Northamptonshire (37%), Bedfordshire (27%) and Cambridgeshire (25%) (**Figure 6.7**, overleaf).

Figure 6.7: PMA Take-up by Location

Location	Sq. m	%
Cambridgeshire	538,382	25%
Suffolk	179,690	8%
M11 Corridor	55,496	3%
Bedfordshire	587,259	27%
Northants	812,788	37%

6.1.10. The majority of take up within the Cambridgeshire area has been in Peterborough. Fundamentally, take up is a function of available supply rather than a true reflection of occupier demand. Take up within Cambridgeshire has been focused on Peterborough as a result of the availability of land and units in this location and lack of supply elsewhere. That is not indicative of a lack of demand for land and buildings outside of Peterborough within wider Cambridgeshire.

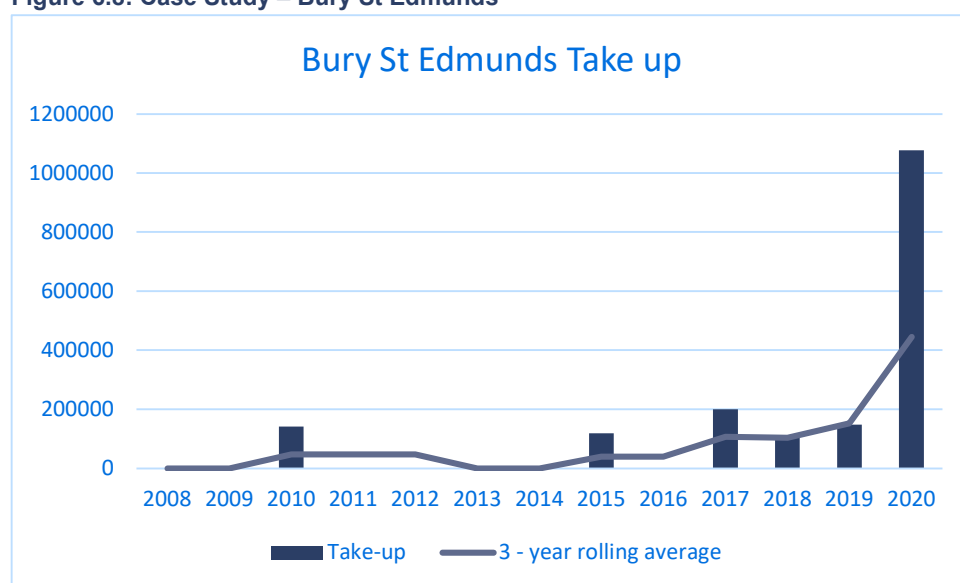
6.1.11. Key recent deals in the PMA include:

- In August 2021, MH Star (e-commerce logistics) took all three speculatively constructed units at G-Park, Bedford Wixams, totalling 49,239 sq. m (530,000 sq. ft) prior to PC of the buildings.
- MH Star also took a new build unit of 20,996 sq. m (226,000 sq. ft) at Peterborough Gateway in March 2021;
- Oatly (food production) took a new unit of 35,768 sq. m (385,000 sq. ft) at Peterborough Gateway in March 2021.
- Amazon took the second-hand Crossdock 252 in Huntingdon, extending to 23,388 sq. m (251,746 sq. ft) in October 2020.
- 80,825 sq. m (870,000 sq. ft) was leased to Belgian logistics company across two phases, Weerts Group at Suffolk Park, Bury St Edmunds (build to suit deal agreed in October 2010)

Case Study: Suffolk Park, Bury St Edmunds

6.1.12. The provision of high quality and deliverable land can significantly increase take-up rates compared to the long term average position. Bury St Edmunds is one such comparable where the provision of land at Suffolk Park, which has outline planning permission for B1 and B8 uses of up to 185,806 sq. m (2 million sq. ft.) (**Appendix 1**), has had a marked impact on take up levels in Bury St Edmunds, as illustrated by **Figure 6.8**, below.

Figure 6.8: Case Study – Bury St Edmunds



6.1.13. The scheme was granted outline planning permission in 2017 and has had a considerable impact on take-up rates. The three year rolling annual average take up rate was 41,314 sq. m (444,702 sq. ft) in 2020. Occupiers at Suffolk Park include Hermes Parcelnet Ltd, Weerts Group, MH Star UK Ltd, Unipart Logistics, Treatt, Sealey Professional Tools, and The East of England Ambulance Trust. Units delivered at the scheme have ranged from 110,000 sq. ft for Sealey, up to 870,000 sq. ft (to Weerts Group over two phases).

6.1.14. Increased demand will occur where high quality supply becomes available, over and above historic take up rates, on the basis of supply shortages elsewhere in the market area and nationwide trends which are causing an exponential increase in demand for logistics space.

Current occupier requirements

6.1.15. Considering occupier requirements provides a snapshot of demand. Requirements may or may not translate to take-up and this may either be a result of occupiers undertaking trawling exercises to ascertain availability with no firm intention to secure space, or due to lack of supply preventing occupiers from securing space despite an active requirement. Utilising Savills' database of occupier requirements demonstrates that there are currently 34 active requirements for units of 9,290 sq. m plus totalling 616,411 sq. m (c. 6 million sq. ft) which would be suitable for the proposals at Bar Hill. The vast majority of requirements are on behalf of logistics occupiers. The search areas specified by occupiers vary widely but include:

- South East and Midlands
- A14 Corridor

- London – Peterborough – Felixstowe
- Northampton plus 1 hour radius
- M11/A12/A14

6.1.16. In addition, there are also a number of current national requirements for units of up to 92,900 sq. m in highly accessible locations throughout the UK. These national requirements are being driven by the strong growth in the e-commerce sector and are from 3PLs and on-line retail sectors. The scale and accessibility of J25 Bar Hill means that the proposals would be well-placed to compete for these national requirements.

Conclusions

6.1.17. Analysis of take up demonstrates the overall scale of demand, which is considerable, as well as the scale of individual occupier requirements for this area, and the resulting rate at which prime sites can be taken up. A point which is further illustrated by the case study of Suffolk Park in Bury St Edmunds.

6.1.18. Analysis of take-up demonstrates:

- There is significant demand across the market assessment areas which translates into strong ongoing levels of take up;
- Occupier demand is focused on the best quality units which can meet modern business requirements;
- Units at the larger size ranges make up a key component of demand. The average size of unit transacted ranged from 26,508 sq. m -28,239 sq. m (285,340 – 303,962 sq. ft.) and 38% of take up by floorspace is of units of 46,451 sq. m (500,000 sq. ft) plus.
- Cambridgeshire is an important sub-market, accounting for a quarter of all take-up within the PMA, which is focused on Peterborough due to availability of supply.
- Take-up is driven by availability of high quality supply and where sites become available this can have a marked impact on historic take-up rates, as evidenced by Suffolk Park.
- There are a number of active requirements (local, regional and national) that would be suitable for the proposals if they were available now.

7. Market Area Supply Assessment

7.1.1. This section firstly considers the supply of buildings within the Property Market Area, Wider Market Area and Core Market Area, of 9,290 sq. m and above and then reviews the supply of land available to accommodate a unit of this size.

Building Supply Assessment

7.1.2. The supply of buildings within the assessment area in excess of 9,290 sq. m has been calculated, including speculative units which are committed or under construction (as at October 2021) and is set out in the schedule below. There is currently a total of **11 buildings** available in the PMA which total **199,898 sq. m** (2.15 million sq. ft.). A plan showing the location of the units is included at **Appendix 2**.

Figure 7.1: PMA Building Supply

Ref.	Building Name	Location	Developer/ Owner	Grade	Size (sq. m)
1	Unit 2 Symmetry Park (Phase 2)	Biggleswade	Tritax Symmetry	A	14,864
2	Unit 4 Symmetry Park (Phase 2)	Biggleswade	Tritax Symmetry	A	21,368
3	Delta 307, Delta Park	Peterborough	Trebor	A	28,587
4	Delta 231, Delta Park	Peterborough	Trebor	A	21,474
5	Unit 1 Total Park	Bedford	Total Developments	A	9,755
6	Bedford 130, Bedford Commercial Park	Bedford	Goodman / Bedford Borough Council	A	12,077
7	Unit 1 Bedford Link Logistics Park	Bedford	London Metric Property Plc / Graftongate Developments Ltd	A	33,068
8	Icon Harlow - Unit E	Harlow	Stoford / TGP Capital	A	10,357
9	DC8 Prologis Park Kettering -(U/O)	Kettering	Prologis	A	22,897
10	Corby 150 - Eurohub	Corby	Nuveen / Prologis	B	13,979
11	Ascent 123, Ascent Logistics Park	Leighton Buzzard	Firethorn Trust	A	11,473
Total:					199,898

7.1.3. With the exception of Corby 150, every available unit is of Grade A quality, with the majority being new speculatively constructed units. There are **four units under construction within the Core Market Area (CMA)**, totalling 86,293 sq. m (928,850 sq. ft). This represents c. 36% of the total supply of buildings within the PMA. Peterborough 736 which is located within the CMA and was the largest unit within the supply at 68,442 sq. m (736,703 sq. ft) is now under offer to Amazon who occupy the adjacent unit.

7.1.4. On the basis of the five year average take-up rates within the respective assessment areas the relative supply of units equates to:

- PMA – 0.46 years;
- WMA – 0.50 years; and
- CMA – 0.56 years.

7.1.5. It is clear that there is a critical and worsening shortage of units in the assessment area.

7.1.6. In these circumstances, a sufficient supply of immediately available land in both quantitative and qualitative terms (including a choice of locations and plot sizes to meet a range of occupier requirements) is therefore essential and has been considered below.

7.2. Quantitative Land Supply Assessment

7.2.1. The supply of land within the PMA which is available for development, has planning permission for B2 or B8 uses and can accommodate a unit of 9,290 sq. m and above has been assessed (those sites which are available to satisfy an occupier requirement within short time frames via a build to suit solution).

7.2.2. There are **11 sites** which are immediately available (have planning permission and are not subject to any constraints to delivery):

- Flagship Park, Peterborough;
- Alconbury Enterprise Campus, Alconbury Weald;
- Suffolk Park, Bury St Edmunds;
- Symmetry Park, Biggleswade;
- Symmetry Park, Kettering;
- Kettering Gateway;
- St Modwen Park – Stanton Cross Industrial Park, Wellingborough;

- Ogee Business Park, Wellingborough;
- Midas, Harlow;
- Baytree, Dunstable;
- Lancaster Way Business Park Phase 2, Ely

7.2.3. In total these sites have capacity for **408,348 sq. m** (4.40 million sq. ft) of floorspace within units of 9,290 sq. m plus¹¹. A schedule of sites and accompanying plan is included at **Appendix 3**.

7.2.4. The supply position based upon the capacity of the available sites across the assessment area compared to the respective five year average annual take up rate is set out at **Figure 7.2** and the overall supply position, taking into account the supply of buildings has been calculated at **Figure 7.3**.

Figure 7.2: Quantitative Supply Assessment (Available Land)

Assessment Area	Available Land Supply Capacity (sq. m)	Average Take-up (sq. m pa)	Years' Supply
PMA	408,348	434,737	0.94
WMA	352,876	378,404	0.93
CMA	115,218	154,105	0.75

Figure 7.3: Quantitative Supply Assessment (Available Land & Buildings)

Assessment Area	Total Available Supply Land & Buildings (sq. m)	Average Take-up (sq. m pa)	Years' Supply
PMA	608,247	434,737	1.40
WMA	541,302	378,404	1.43
CMA	201,511	154,105	1.31

7.2.5. By all measures, the market area is severely undersupplied in relation to past levels of take-up. Including both available land and premises of 9,290 sq. m and above, there is between only around 1.4 years' supply within the PMA and the WMA. **There is a particularly severe shortage in the Core Market Area where there is only 1.31 years' supply in total.**

7.2.6. If take-up continues at historic average rates, the current consented and deliverable supply will therefore be eroded entirely within 16 months in the Core Market Area (c. 18 months in the Wider Market and Property Market Areas). This level of supply does not provide sufficient occupier choice. The amount of supply should also be viewed in the context of the length of time that it can take to deliver a strategic scale employment site through the Local Plan

¹¹ Capacity for smaller units has not been included being outside the assessment parameters.

system and to the market (this can be significant in some cases) and the rapid and increasing speed of take up which is seen at prime sites once they are serviced and available (as evidenced by the case study of Suffolk Park).

7.3. Impact of Increasing Demand

7.3.1. Furthermore, the headline figures set out above overstate the relative amount of supply, given that they are based on historic take-up and that there continues to be increasing levels of demand and structural changes in the logistics sector which have been outlined in the preceding sections of this report.

7.3.2. One of the constraints of using past take-up to forecast future land requirements is that it does not take into account potential future growth in demand. Based on assessment of market trends (Section 3), it is clear that there is a strong and increasing demand nationwide for large scale B8 units to accommodate the requirements of the on-line retail sector particularly. Units are becoming larger and take-up of sites is therefore becoming quicker. This has implications for the supply of land available for units of all sizes as those sites which may have been able to meet a number of occupier requirements in the past are now increasingly being taken up by one or two very large units.

7.3.3. There has been a step-change in the level of demand seen as a result of the pandemic and forecasts are that demand from the on-line retail sector will not fall back to pre-pandemic levels, with a change in consumer behaviour now entrenched. **Take-up is therefore likely to continue to increase over coming years and supply overall will consequently be eroded faster than the figures above would suggest.**

7.3.4. On the basis of the quantitative analysis of supply it is clear that there is an urgent need for additional land to be delivered through the planning system. The sufficiency of the pipeline of sites is considered further at paragraph 7.5 below.

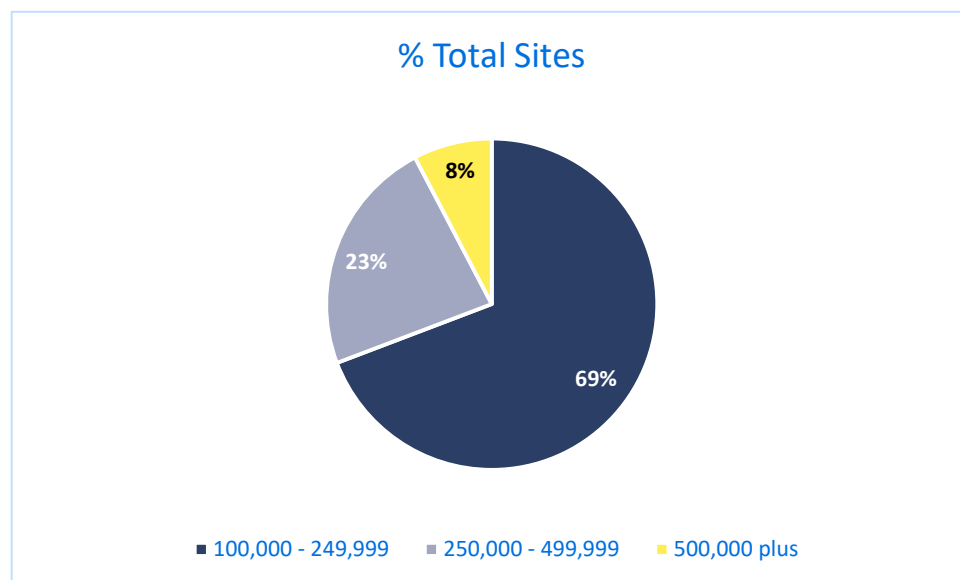
7.4. Qualitative Supply Analysis

7.4.1. These headline figures also do not take account of the qualitative characteristics of the supply in terms of geographical distribution, deliverability, target market of the proposals, and scale of opportunity. These issues are considered below.

Maximum Unit Size

7.4.2. The majority of sites (almost 70%) are only able to accommodate units at the smaller size ranges (up to 23,225 sq. m/250,000 sq. ft) as illustrated by the graph below at **Figure 7.4**. Only one available site (Symmetry Park at Kettering) is able to accommodate units in excess of 46,451 sq. m (500,000 sq. ft). Whilst this site is of significant scale, masterplan options show that it could be taken up via a four unit scheme with first occupation by 2022. This could be delivered in very short timescales based on ongoing levels of demand. There are also no buildings available of this scale

Figure 7.4: Land Supply by Maximum Unit Size



7.4.3. The available supply of sites does not match the demand for units of this scale and is severely insufficient in this regard. As set out within the Demand Analysis (paragraph 6.15 – 6.16), there has been a total of 12 transactions in excess of 46,451 sq. m (2 - 3 per year on average) in the PMA over the last five years and this has equated to 38% of all floorspace taken up over the period.

Geographic distribution of Supply

7.4.4. The proportion of available supply (land and buildings) within each sub-area of the assessment area has been calculated at **Figure 7.5** below. This is a function of the geography of the assessment area as each sub-area is of different size but it is useful to compare the relative proportion of total supply within each sub-area with the proportion of historic take-up within the same area.

Figure 7.5: Land Supply by Location

Location	Sq. m	% Supply	% Take up
Cambridgeshire	112,769	16%	25%
Suffolk	27,936	4%	8%
M11 Corridor	21,508	3%	3%
Bedfordshire	220,477	32%	27%
Northants	300,978	44%	37%
Total	683,668		

7.4.5. It is apparent that **Cambridgeshire has a particular undersupply** in relation to previous take-up, accounting for only 16% of available supply, but 25% of past take-up. This implies that the supply of land and premises is insufficient to maintain previous levels of take up within Cambridgeshire.

7.5. Pipeline Supply

7.5.1. Sites which would compete with J25 Bar Hill (i.e. with potential to contribute to the supply of strategic employment land in the market area) have been assessed. The PMA has been used as the basis of the assessment albeit, as noted below, sites within the Wider Market Area would be principally expected to compete with J25 Bar Hill. Sites of 5.0 ha or more which can accommodate a B2/B8 unit of at least 9,290 sq. m have been included within the assessment. Sites which are smaller than this threshold have been reviewed but excluded from the assessment as they are not comparable in terms of the nature or scale of employment use likely to be delivered.

7.5.2. Sites which have planning permission but are subject to other delivery constraints, or benefit from an allocation or draft allocation for B2/B8 use have been included. A schedule of allocations and draft allocations which can accommodate a unit of 9,290 sq. m and above is included at **Appendix 4**.

7.5.3. There are various sites within the market area being promoted for employment use by developers on a speculative basis. These sites are subject to a significant level of planning risk and have therefore not been included within the assessment of supply at this stage.

7.5.4. The land supply position for each assessment area, including all comparable supply (buildings, available land and pipeline supply) is set out at **Figure 7.6** below.

Figure 7.6: Pipeline Land Supply Summary Position

Assessment Area	Pipeline Supply (ha)	Pipeline Supply (sq. m) ¹²	Total supply including buildings, land and pipeline (sq. m)	Years' Supply Total
PMA	413.41	1,653,640	2,061,988	4.74
WMA	295.31	1,181,240	1,534,116	4.05
CMA	140.72	562,880	678,098	4.40

7.5.5. **On the assumption that all comparable sites in the pipeline come forward for development, there is only 4.74 years supply in total within the PMA**, and this falls to 4.05 years in the WMA. This should be viewed in the context of the lengthy timescales required to deliver sites through the planning system. It is clear that the current pipeline and overall supply is severely deficient and will not provide for continuity of supply over the various local plan periods within the PMA.

¹² Assuming an average development density of 40%.

7.5.6. Unlike for housing land, there is no guidance around the amount of supply which should be provided. There are various approaches which could be taken. Other studies have considered that 15 years' supply of strategic employment sites should be provided.¹³ Alternatively, using the approach taken to housing land would require a five year supply plus an appropriate buffer to allow for market choice (which should be considerable in the case of employment land to reflect the diverse nature of occupier requirements).

7.5.7. **By either measure, the supply of land within the PMA is insufficient.**

7.5.8. Sites within the pipeline are subject to varying degrees of planning and delivery risk so the relative supply figures are a 'best case scenario' on the basis that every comparable site is delivered (which is highly unlikely to happen, particularly within the short-medium term). Research into the individual sites has identified those which have potential to provide for units of 9,290 sq. m plus. In some cases, schemes are being promoted which include a range of unit sizes with only one larger unit – the whole site has still been included within the comparable pipeline supply in these instances as a reflection of the fact that scheme is still evolving.¹⁴

7.5.9. Whilst the quantitative analysis takes a comprehensive approach to considering pipeline supply, from a market perspective, the majority of the sites, many of which are of a smaller scale, would not be comparable. Sites of strategic scale are principally comparable to the proposals at J25 Bar Hill. A threshold of 25 ha is generally accepted in defining strategic employment land which reflects the approach taken in the West Midlands when considering the supply of strategic employment land.¹⁵

7.5.10. Sites of a strategic scale are reviewed below:

- **Gateway Peterborough** (Policy LP44 of the Peterborough Local Plan) – this site is a mixed use urban extension with a total area of 83.48 ha. The employment component comprising 464,500 sq. m of strategic scale employment floorspace has been **fully developed with all units occupied** demonstrating both the strength of demand in the market area as well as the speed of take-up which can occur when high quality sites are available.
- **Red Brick Farm, Peterborough** (Policy LP44 & LP45 of the Peterborough Local Plan) – this site extends to 51 ha gross. The site has outline planning permission for employment use and is therefore already included within the available land supply. Masterplan proposals are predominantly for a small unit scheme and there is limited capacity for units of 9,290 sq. m plus based on permitted height parameters (one unit currently shown).
- **Land at Kettering North** (Policy 36 of the North Northamptonshire Joint Core Strategy) – 40 ha of land is allocated here for employment use and a planning application has been submitted for the first phase of development which comprises 40,215 sq. m of B8 floorspace across five units, with a site area of 23 ha. The

¹³ Peter Brett, West Midlands Strategic Sites Study (2015).

¹⁴ Land South of Coldhams Lane, Land adjacent to Magnetic Park Desborough.

¹⁵ West Midlands Strategic Site Study (Peter Brett, 2015), West Midlands Strategic Employment Sites Study (Avison Young, 2021)

units proposed as part of the first phase range from 2,787 sq. m – 11,148 sq. m (30,000 sq. ft – 120,000 sq. ft) so are of a relatively small scale in comparison to the proposals at J25 Bar Hill. Subsequent phases are limited to small scale campus style development across Class E(g) and B2 use classes. This site will not be targeting the same market as the proposals.

- **Land at Kettering South** (Policy 37 of the North Northamptonshire Joint Core Strategy) - land is allocated here across two parcels of land. Parcel A is reserved for smaller scale Class E(g) and B2 uses and Parcel B, which extends to 55 ha is allocated for larger scale distribution use. Planning permission has subsequently been granted for up to 214,606 sq. m of B8 development. The maximum unit size permitted is 120,000 sq. m with a current application having been submitted to increase this to 129,000 sq. m. This site is included within the assessment of available supply (Symmetry Park, Kettering).
- **Rushden East Sustainable Urban Extension** (Policy EN3 of the East Northamptonshire Local Plan) - total site area of SUE 198 ha, to include 29 ha for employment use with capacity for 110,000 sq. m of B2/B8 floorspace located to the east of Rushden, alongside the A6. An outline planning application is under consideration. This site is on the perimeter of the WMA, with poor linkages to the A14 and will therefore not compete with J25 Bar Hill for strategic scale requirements.
- **Lancaster Way, East Cambridgeshire** (Policy ELY 11 of the East Cambridgeshire Local Plan) – 40.5 ha of land is allocated here for Class E(g), B2 and B8 use in reflection of the outline planning permission which has been granted over 36.6 ha of the site. This site is included within the assessment of available supply (Lancaster Way Business Park).
- **Holme Farm, Biggleswade** (Policy SE3, Central Bedfordshire Local Plan) - 63 hectares of new employment land is allocated, comprising up to 38ha of strategic warehousing and up to 25ha of local employment opportunities. This site is located adjacent to the A1 at Biggleswade and falls within the market area and therefore the strategic element of the proposals will be targeting a similar market to the proposals at Bar Hill (the local element will not be competing).
- **Sundon Rail Freight Interchange (RFI)** (Policy SE1, Central Bedfordshire Local Plan) – this site is located outside the market area adjacent to Junction 11 of the M1, but within the PMA which includes the whole of Central Bedfordshire for assessment purposes. The proposals would be targeting a different market, with Sundon being a rail-served site serving the M1 corridor. The allocation extends to 40 ha plus 5 ha rail intermodal facility, and up to 170,000 sq. m of rail-served distribution units
- **Marston Gate Expansion** (Policy SE2, Central Bedfordshire Local Plan) – 35 ha of land is allocated for B2/B8 development adjacent to Junction 13 of the M1. An outline planning application for 166,000 sq. m of floorspace was submitted in 2018 but is yet to be determined. Similarly to Sundon RFI, this site is outside the competing market area, serving the M1 corridor market but falls within the PMA so has been included for completeness.

- **Marston Garden Village** (Policy SA2, Central Bedfordshire Local Plan) this site is allocated for a mixed-use development comprising approximately 5,000 dwellings and approximately 30 ha of employment land. The employment land is allocated for new non-strategic E(g) and B2 uses, intended specifically for employment relating to research and development, office, services and tourism to contribute towards meeting local employment needs. The allocation is therefore not comparable with the proposals at Bar Hill. The site is also outside the market area, being located at Junction 13 of the M1.
- **Rockingham Hub** (Corby/North Northamptonshire) – An outline planning application for the development of an employment park comprising up to 121,703 sq. m. of floorspace was submitted in 2015. The LPAs resolved to grant planning permission in 2016 but the scheme has been subject to significant delays in completing the Section 106 since this time and has yet to be formally approved. The site has been sold for car storage uses.

7.5.11. The pipeline of strategic employment sites therefore includes:

- Sites that are already delivered and completed (Gateway Peterborough);
- Sites which have planning permission and are already accounted for in the available supply (Red Brick Farm, Lancaster Way Business Park, Land at Kettering South);
- Sites that are not comparable due to the type and scale of employment use proposed (meet a local need – Marston Garden Village, Land at Kettering North);
- Sites which are outside the WMA (which is considered the immediate competing market to J25 Bar Hill), but within the PMA (Rushden East SUE, Sundon RFI, Marston Gate Expansion); and
- Sites that are stalled and subject to a significant degree of uncertainty around delivery (Rockingham).

7.5.12. The competing pipeline of strategic sites which have not already been accounted for in the supply and are comparable to the proposals is therefore limited to Holme Farm, Biggleswade (38 ha of strategic warehousing).

7.6. Conclusions

7.6.1. The analysis of supply within the assessment areas demonstrates that:

- There is a critical shortage of both land and premises available to satisfy occupier requirements.
- There is only **0.46 years supply of units** in the PMA and even including available (consented and serviced) land, the supply is severely insufficient in quantitative terms with only around **1.40 years' supply within the PMA and the WMA (land and buildings)** with a particularly severe shortage in the Core Market Area where there is only 1.31 years' supply in total.

- If take-up continues at historic average rates, the current consented and deliverable supply will be eroded entirely within 16 months in the Core Market Area (c. 18 months in the Wider Market and Property Market Areas).
- The pipeline of sites within the planning process is therefore of vital importance. Sites within the pipeline are subject to varying degrees of risk in terms of planning and delivery – an allocation within a local plan in no way guarantees that a site will come forward and those that are delivered often take longer than anticipated and may or may not provide premises which are of a comparable strategic scale to those proposed at Bar Hill.
- Even if all the potentially comparable sites in the pipeline came forward for development (which is unlikely), there would still only be **4.74 years supply in total (including all comparable allocations, draft allocations, available consented land and premises) within the PMA**, and this falls to 4.05 years in the WMA. This level of supply is wholly insufficient to meet demand given the risk attached to the pipeline of sites and the length of time over which local plans within the PMA should be providing land.
- Supply is very likely to be eroded even faster than these headline figures suggest given that they are based on historic take-up and do not take account of the structural changes which have taken place in the market and the step change in demand which has resulted.
- The majority of available sites (almost 70%) are only able to accommodate units at the smaller size ranges and this does not match the demand profile, with 38% of take up by floorspace being for units of 46,451 sq. m and above.
- Cambridgeshire has a particular undersupply in relation to previous take-up, with the area accounting for only 16% of available supply, but 25% of past take-up.
- There is a particular shortage of strategic sites comparable to J25 Bar Hill.
- Indicative of the strength of demand and lack of supply, a significant proportion of land allocated within local plans across the PMA has either already been delivered (completed and fully let) or is in the process of being delivered, having been granted planning permission.

8. Conclusions

8.1.1. Savills is instructed by Lolworth Developments Limited to advise on the market need for proposals for strategic employment development at J25 Bar Hill, Greater Cambridge.

8.2. National & Regional Context

8.2.1. Market trends, driven in large part by the step-change in on-line retail sales, all point to a significantly increasing demand for land overall, for larger, strategic scale sites which are capable of accommodating the largest occupier requirements, and for land within easy reach of the principle ports and consumer markets. The proposals at Bar Hill directly respond to these market trends.

8.2.2. Nationwide, there were record breaking levels of take-up nationally throughout 2020 as a result of the increase in on-line retailing which has been accelerated due to the COVID-19 lockdowns and this trend has continued with take up figures to Q3 2021 being higher still. Demand is particularly focused on Grade A space and there is a long term trend nationwide towards larger unit sizes with increased plot requirements.

8.2.3. Strong demand and rapid take up has resulted in a **severe shortage of supply of premises nationwide (c. 1 years supply) and** there is a particularly severe shortage of supply of the best quality Grade A space which is now at **the lowest level ever recorded.**

8.2.4. The East of England has seen a significant increase in occupier requirements over the course of the last 12 months, driven by the increasing awareness of the benefits which the location can offer in terms of accessibility and proximity to the East Coast Ports, London and the South East and Midlands markets.

8.3. Market Area Demand

8.3.1. There is significant demand across the PMA which translates into strong ongoing levels of take up which (in line with national trends) is focused on the best quality units which can meet modern business requirements.

8.3.2. Units at the larger size ranges make up a key component of demand and Cambridgeshire is an important sub-market, accounting for a quarter of all take-up within the PMA, (focused on Peterborough due to availability of supply in this location). Take-up is driven by availability of high quality supply and where sites become available this can have a marked impact on historic take-up rates, as evidenced by Suffolk Park.

8.3.3. There are a number of active requirements (local, regional and national) that would be suitable for the proposals if they were available now.

8.4. Market Area Supply

8.4.1. Analysis of supply within the assessment areas demonstrates that there is a critical shortage of both land and premises available to satisfy occupier requirements and in the planning pipeline. By all measures the PMA is undersupplied (0.46 years supply of premises; 1.40 years supply of available land and premises and only 4.74 years total supply including pipeline sites, many of which have a significant amount of planning and delivery risk attached and may serve a different market to the proposals). Taking into account the time periods which the local plans within the PMA cover, and over which there should be continuity of supply of employment land, it is very clear that there is an urgent requirement for additional land to be allocated.

8.4.2. If take-up continues at historic average rates, the current consented and deliverable supply will be eroded entirely within 16 months in the Core Market Area (c. 18 months in the Wider Market and Property Market Areas).

8.4.3. Supply is very likely to be eroded even faster than these headline figures, which are based on historic take-up, suggest given the structural changes which have taken place in the market and the step change in demand which has resulted. There is a particular shortage of sites within Cambridgeshire and also across the PMA of sites which can accommodate the largest units.

8.4.4. Indicative of the strength of demand and lack of supply, a significant proportion of land allocated within local plans across the PMA has either already been delivered (completed and fully let) or is in the process of being delivered, having been granted planning permission.

8.5. Conclusions

8.5.1. Against a backdrop of strong and increasing demand, the supply position within the PMA is severely constrained. The pipeline of sites which can accommodate units of 9,290 sq. m plus is wholly insufficient in both quantitative and qualitative terms and, even assuming all the sites came forward would last for less than 5 years. There is therefore a very urgent need for additional strategic employment allocations which can meet the needs of both the manufacturing and logistics sectors.

8.5.2. J25 Bar Hill is ideally placed from a market perspective to help to meet this need and would see very strong demand from occupiers on the basis of its locational credentials and excellent accessibility to both the East Coast ports and onward consumer markets.

Appendices

Appendix 1

Suffolk Park, Bury St Edmunds



**SUFFOLK
PARK** 

BURY ST EDMUNDS | IP32 7FQ



JAYNIC

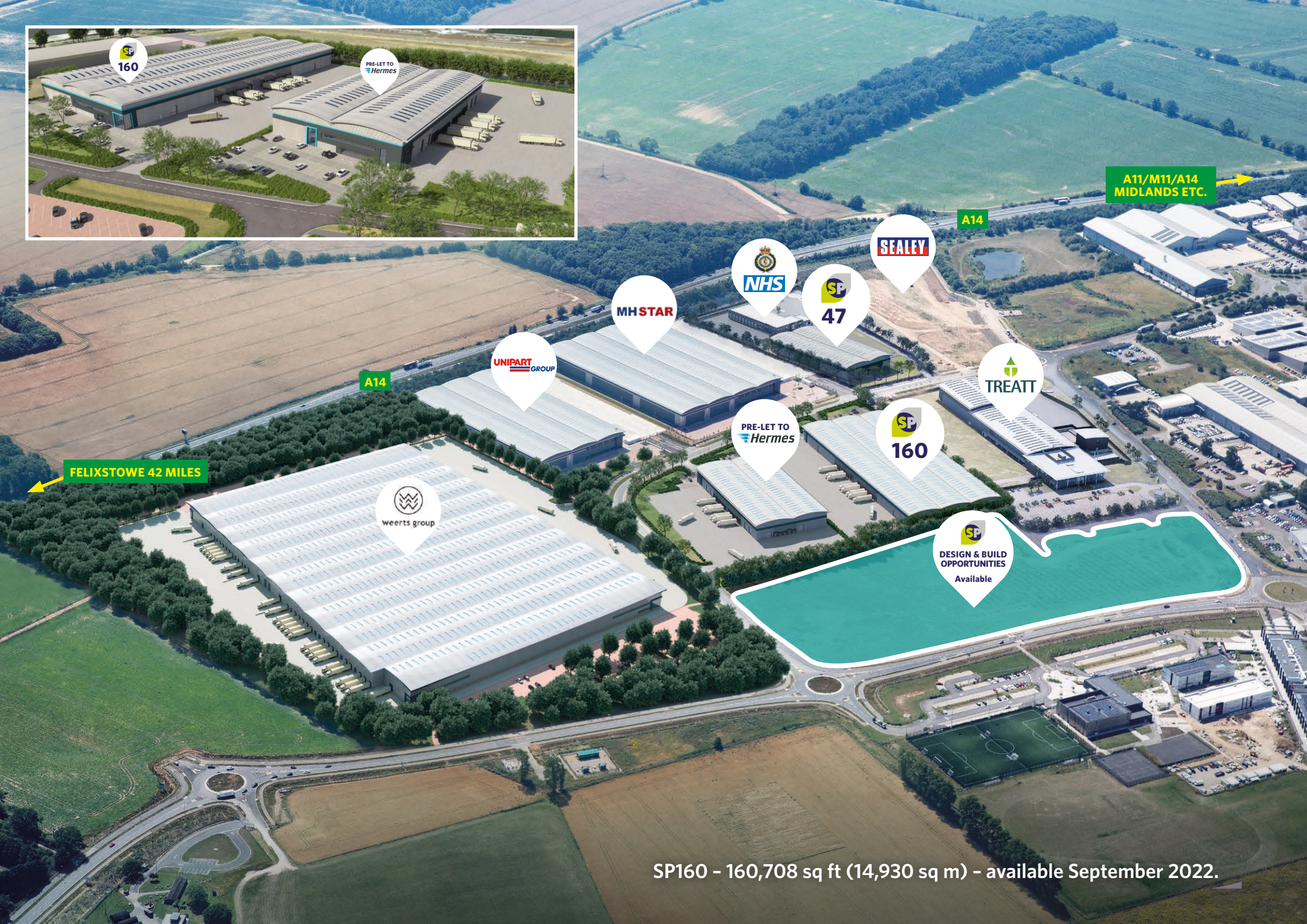
SUFFOLK-PARK.UK

NEW WAREHOUSE UNIT

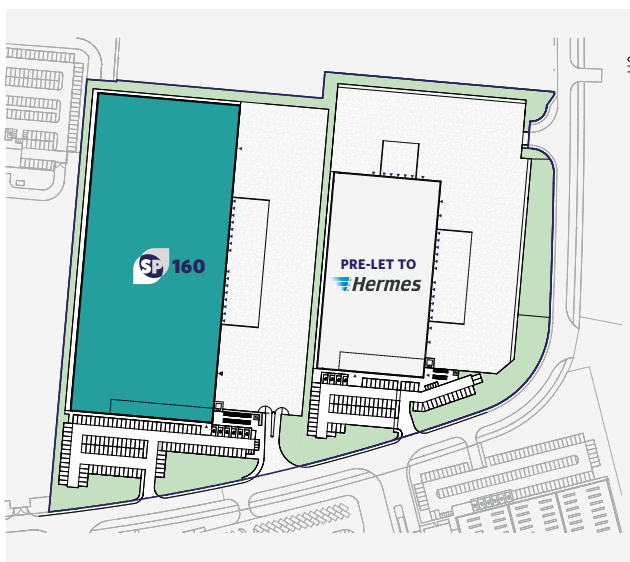
**AVAILABLE SEPTEMBER 2022
TO LET**

SP 160 160,708 sq ft (14,930 sq m)

**With over 1.4 million sq ft
transacted to date,
Suffolk Park is the logistics
destination of choice in the
eastern region.**



SP160 - 160,708 sq ft (14,930 sq m) - available September 2022.



AVAILABLE SEPTEMBER 2022

160,708 sq ft (14,930 sq m)

Specification

- 12.5m clear height
- Yard depth 50m
- 16 dock levellers
- 2 level access doors
- 114 car parking spaces (6 disabled)
- BREEAM 'Excellent'
- EPC 'A' Rating
- 65 HGV parking spaces
- 154 cycles (+ 4 visitor)
- 6 EV charging points (+ 6 future)
- 500 KVA allocated
- Floor loading 50kn/m²

Accommodation	sq ft	sq m
Warehouse	155,000	14,400
First floor office	5,108	475
Plant	600	55
TOTAL	160,708	14,930

Bury St Edmunds

Bury St Edmunds is located on the strategically important A14 corridor, linking Felixstowe to the Midlands and London via the M11.

Bury St Edmunds boasts a variety of production and distribution occupiers including major national operators such as M H Star UK Ltd, Unipart, Sealey, Greene King, British Sugar,

Century Logistics, Treatt, Atalian Servest, Mizkan and Taylor Wimpey.

Major residential development is underway with over 5,000 new homes allocated and construction commenced, to help the town's continued economic growth and accommodate an expanding workforce.

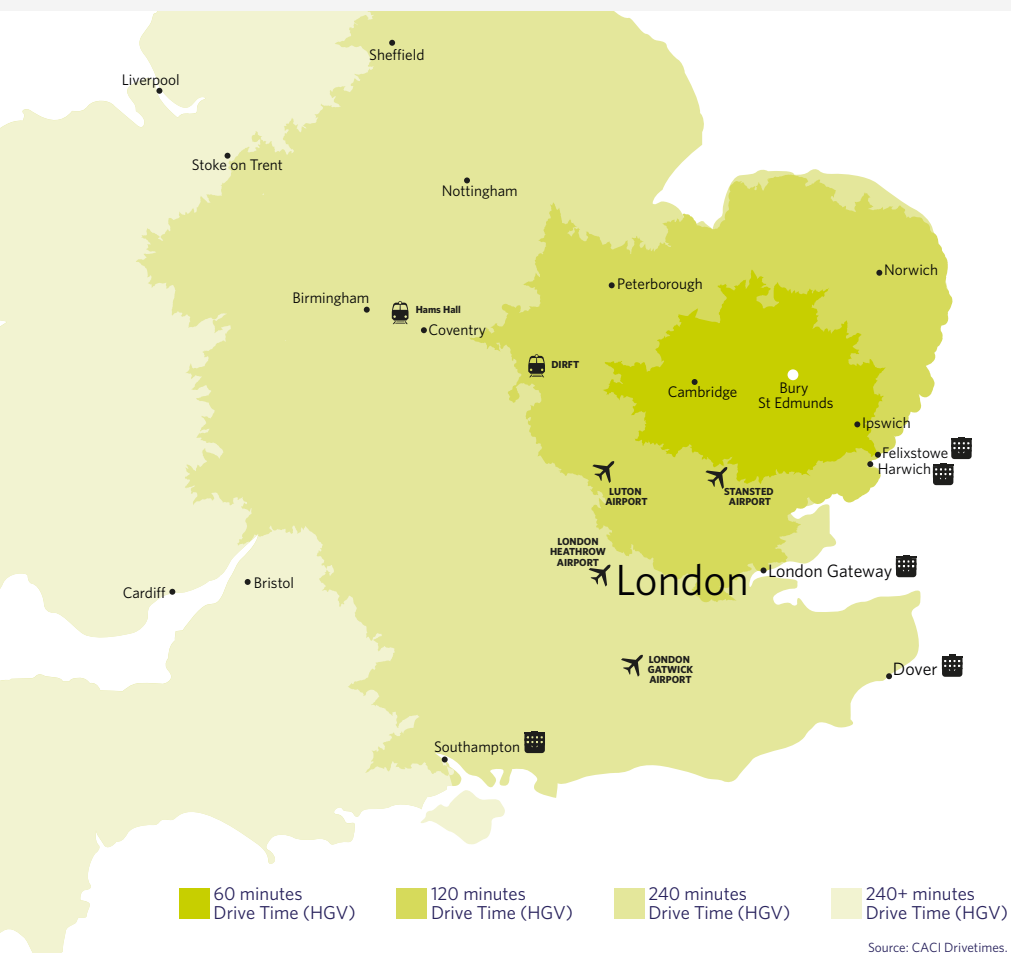
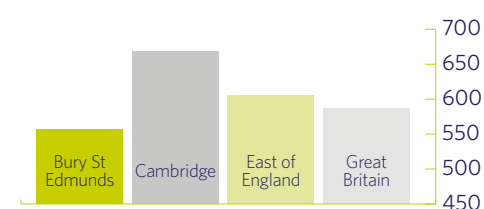
Labour

Labour supply:

Economically active	264,600
In employment	254,900
Employees	216,700
Self employed	38,200
Unemployed (est.)	6,100

Average wages (£/weekly):

Source: Nomis



Suffolk Park is located within 1 hour of Felixstowe, the UK's largest container port.

The Port of Felixstowe is the United Kingdom's busiest container port dealing with 42% of Britain's containerised trade. In 2015 it was ranked as the 37th busiest container port in the world and Europe's 6th busiest.



Road (HGV)	Distance	Time
A14 Junction 45	1.4 miles	2 minutes
Ipswich	26 miles	39 minutes
Cambridge	29 miles	45 minutes
Norwich	47 miles	60 minutes
Peterborough	68 miles	76 minutes
London	83 miles	104 minutes

Airports	Distance	Time
Stansted	50 miles	52 minutes
Luton	65 miles	83 minutes
London Heathrow	105 miles	107 minutes
London Gatwick	112 miles	113 minutes

Seaports	Distance	Time
Felixstowe	42 miles	52 minutes
London Gateway	86 miles	95 minutes
Dover	139 miles	148 minutes
Southampton	166 miles	176 minutes

Railports	Distance	Time
DIRFT	93 miles	108 minutes
Hams Hall	120 miles	130 minutes

Source: Google Maps.

Location

Suffolk Park is positioned adjacent to the A14, the main arterial route for the region, linking the Port of Felixstowe in the East with Cambridge, the M11 and the wider motorway network in the West. J45 of the A14, via the recently completed Rougham Tower Avenue, lies just 1.4 miles to the east of the site.



SAT NAV REF: IP32 7FQ



Developer

JAYNIC

Jaynic is an established property company focusing on land promotion and business space development in the south and east of England.

The company has a strong track record in the delivery of maximum value through the planning process and high quality, sustainable and efficient development.

jaynic.co.uk

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Appendix 2

Building Supply Plan



Appendix 3

Land Supply Schedule and Location Plan

Available Land Supply

Ref	Scheme Name	Location	Developer / Owner	Remaining Capacity for large units (sq. m)	Use
1	Flagship Park	Peterborough	Trebor Developments LLP	40,645	B2 / B8
2	Suffolk Park	Bury St Edmunds	Jaynic	27,936	B8
3	Symmetry Park	Biggleswade	Tritax Symmetry	46,637	B8
4	Symmetry Park	Kettering	Tritax Symmetry	191,612	B8
5	Kettering Gateway	Kettering	SEGRO	9,523	B2 / B8
6	St Modwen Park - Stanton Cross Industrial Park	Wellingborough	St Modwen	15,989	B2 / B8
7	Finedon Road, Ogee Business Park	Wellingborough	Stepnell	9,383	B2 / B8
8	Midas	Harlow	Canmoor	11,151	B2 / B8
9	Baytree Dunstable, Central B	Dunstable Beds	Baytree	33,410	B8
10	Lancaster Way Business Park - Phase 2, East Cambridgeshire	Cambs	Grovemere Property	22,062	B2 / B8

Total PMA

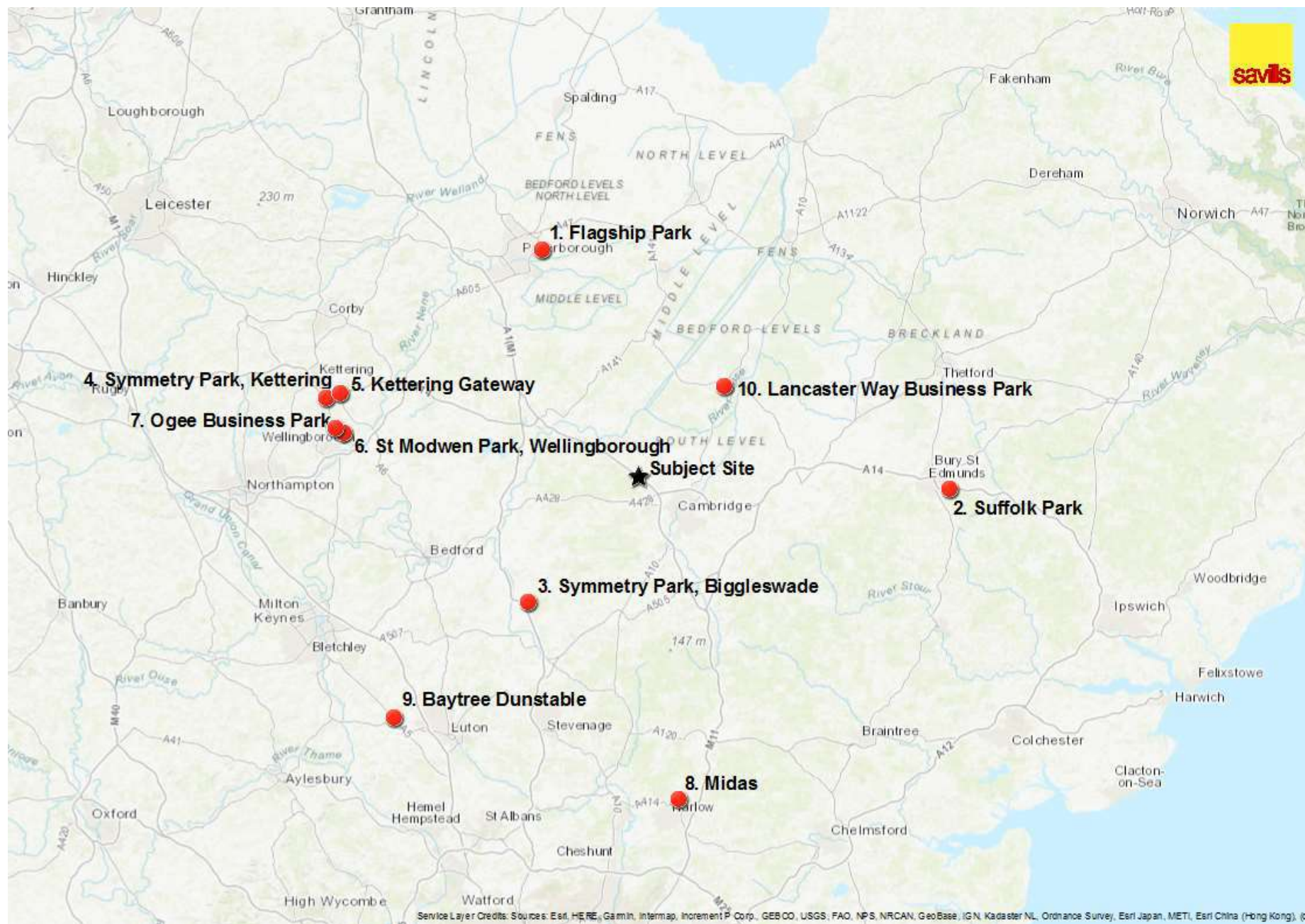
408,348

WMA

352,876

CMA

115,218



Appendix 4

Pipeline Supply Schedule

Scheme Name	Developer/ Owner	Area (ha gross)	Use	Capacity (sq. m)	Comments
North Northamptonshire JCS (2016)					
Land at Kettering North	Buccluch Property	40.0	B2 / B8	94,563	JCS Policy 36. Planning application submitted in March 2020 for 5 B8 warehouses on site of 23 ha.
Land at Nene Valley Farm, Rushden	Ashfield Land Developments Ltd	12.0	B1 / B2 / B8	18,260	JCS Policy 35 - application for mixed use including retail refused.
Land at Cockerell Road, Corby		9.5	B2/B8	1,200	JCS Policy 34 - small unit scheme proposed on part.
Rockingham MRC Enterprise Area (sites promoted for employment use)	Various	51.2	B1 / B2 / B8		JCS Policy 27 allocates 300 ha in total. Planning applications have been submitted for Rockingham Hub and Land off Centrix Business Park which total 51.2 ha. Rockingham Hub (30.7 ha) has been sold for car storage uses and the application is yet to be determined.
Corby (Part 2 Local Plan adopted September 2021)					
West Corby Sustainable Urban Extension	Corby West Consortium	11.7	B1/B2	46,850	Policy 32 - mixed use allocation of 290 ha with employment area of 11.7 ha.
Kettering (due to be adopted December 2021)					
Land adjacent to Magnetic Park, Harborough Road, Desborough		8.1	B2 / B8	20,000	Policy DES6/D1 - planning application for predominantly small unit scheme under consideration (one unit of 11,000 sq. m included).
East Northamptonshire Local Plan Part 2 (Submitted to Secretary of State March 2021)					
Rushden East Sustainable Urban Extension		29.0	B1 / B2 / B8	110,000	Policy EN33 - total site area of SUE 198 ha to include 29 ha for employment use with capacity for 110,000 sq. m of B2/B8 floorspace at alongside the A6. Outline application under consideration. On the perimeter of the WMA with poor linkages to the A14.
Cambridge City Local Plan (adopted 2018)					
Land South of Coldhams Lane (Coldhams Lane Logistics Park)		9.00	B8	9,854	Policy 16 - outline application under consideration for small unit scheme.
East Cambridge Local Plan (adopted 2015)					
Land south of Snailwell Road		7.00	B1 / B2 / B8		Policy FRD 4.
Land north of Snailwell Road		5.50	B1 / B2 / B8		Policy FRD 5 - screening opinion submitted for B2/B8 unit.
Land south of Landwade Road		7.00	B1 / B2 / B8		Policy FRD 8 - 7.5 ha occupied by DS Smith.
West of Woodfen Road		7.00	B1 / B2 / B8		Policy LIT 1 - 17 ha in total for mix of uses including residential.
Land east of the A412 bypass, Soham		11.00	B1 / B2 / B8		Policy SOH 11 - local employment location.
Central Bedfordshire Local Plan (adopted, July 2021)					
Sundon Rail Freight Interchange		45.00	B8		
Marston Gate Expansion		35.00	B8		Policy SE3. Land to the south of Prologis Park Marston Gate.
North of Luton		7.00	B2 / B8		Policy SA1
Marston Valley		30.00			Policy SA2 - Marston Vale New Village
Holme Farm, Biggleswade		38.00	B8		Wider allocation of 78 ha includes 38 ha for strategic scale employment use.
Peterborough Local Plan (Adopted July 2019)					
Hampton (Kingston Park)		9.17			Policy LP44, LP35, LP5. Urban extension. 9.17 ha of employment remaining.
Oxney Road Site C		9.95	B1/B2/B8		Policy LP46.1.
West Suffolk (consisting of the former Forest Heath area (FHDC) and former St Edmundsbury area (SEBC) Local Plan documents)					
Land west of Mildenhall		5.0	B1/ B2 / B8		Scoping request submitted.
Land north of Acorn Way, Red Lodge (A11)		8.0	B1/ B2 / B8		Targeted at Advanced manufacturing and engineering, automotive, agri-tech, life sciences - Kings Warren Business
Stevenage Local Plan (Adopted 2018)					
Huntingdonshire					
St Neots East	U&C	17.2	B1 / B2 / B8	63,500	St Neots Eastern Expansion. Allocation area 22.0 ha but application for 63,500 sq. m on reduced area of 17.2 ha. Will predominantly address local demand.

PMA
WMA
CMA

413.41
295.31
140.72

J25 Bar Hill

Market Demand Assessment



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Appendix 2: Greater Cambridge's HELAA Site Assessment ref.40248

Land at Slate Hall Farm, Bar Hill, CB23 8HB

Site Reference: 40248

Map 561: Site description - Land at Slate Hall Farm, Bar Hill



Site Details

Criteria	Response
Site area (hectares)	107.48
Parish or Ward	Oakington and Westwick CP; Longstanton CP
Greenfield or previously developed land	Greenfield and Previously Developed Land
Category of site	Dispersal: Villages
Category of settlement	Not within or adjacent to an existing settlement
Current or last use	Commercial/industrial
Proposed development	Non-residential, Office, Research and Development, Research and Development, Research and Development, Research and Development, Public open space, Recreation and leisure, Hotel, Retail

Proposed employment floorspace (m²)	526000
Proposed housing units	-

Site Assessment Summary

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

Site Assessment

Suitable (Outcome = **Red**)

Issue	Assessment	Comments
Adopted Development Plan Policies	Amber	Outside Development Framework Within 200m of the Cambridge Greenbelt
Flood Risk	Amber	Flood zone: Partly in Flood Zone 2 (19%) Partly in Flood Zone 3 (16%) Surface water flooding: 2% lies in a 1 in 30 year event 6% lies in a 1 in 100 year event 21% lies in a 1 in 1000 year event
Landscape and Townscape	Red	NCA 88 Bedfordshire and Cambridgeshire Claylands District Character Area: Fen Edge The Site is generally typical of this characteristic, though recently damaged/altered due to highways improvements to A14 Landscape Character Assessment (2021) Landscape Character Area - 2A: Longstanton Fen Edge Claylands The site has experience considerable change due to the nearby A14 upgrade works. The landscape character of this area has undergone disruption and is degraded due to the intrusion of a major transport

Issue	Assessment	Comments
		route. Development of this site would further degrade the landscape character of the area. Limited low-level development could be achieved if focused near the existing developed area and well buffered.
Biodiversity and Geodiversity	Amber	Consultation with Natural England unlikely to be required(unless residential). Hedgerows, woodland, mature trees and watercourses may qualify as priority habitat/Habitats of Principal Importance and support protected/notable species. Otherwise likely to be of low ecological value (arable). Buildings and mature trees may support roosting bats (if suitable). Records of bats (including barbastelle), water vole and otter within site. Farmland bird populations may be present. Development of the site would not have a detrimental impact on any designated site, or those with a regional or local protection.
Open Space / Green Infrastructure	Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.
Historic Environment	Amber	Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated.
Archaeology	Amber	Extensive settlement of Iron Age and Roman date known in the area
Accessibility to Services and Facilities	Amber	Distance to Primary School: Greater than 1,000m Distance to Secondary School: Greater than 2,000m Distance to Healthcare Service: Greater than 720m and Less than or Equal to 2,000m Distance to City, District or Rural Centre: Greater than 2,000m Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 720m and Less than or Equal to 2,000m Distance to Employment Opportunities: Less than or Equal to 1,800m Distance to Public Transport: Greater than 450m and Less than or Equal to 1,000m

Issue	Assessment	Comments
		Distance to Rapid Public Transport: Greater than 1,800m Distance to proposed Rapid Public Transport: Greater than 1,800m Distance to Cycle Network: Greater than 1,600m Adequate accessibility to key local services, transport, and employment opportunities Proposed development would require accompanying local centre / employment provision, primary school and community centre
Site Access	Amber	The proposed site is acceptable in principle subject to detailed design. The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site. The proposed site is acceptable in principle subject to detailed design. The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site.
Transport and Roads	Red	Remote from any adjacent settlement, sustainability issues (currently proposed for B2/B8) which is possibly more acceptable. Transport Assessment and Travel Plan required.
Noise, Vibration, Odour and Light Pollution	Amber	The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.
Air Quality	Amber	Partially in AQMA. Will require inherent / intrinsic designed in AQ mitigation.
Contamination and Ground Stability	Amber	Potential for historic contamination, conditions required.

Further constraints

Issue		Comments
Constraints to development	-	Agricultural Land Classification: 74% Grade 2; 26% Grade 3 Watercourse crosses the site

		Public Right of Way is on or crosses the site
Strategic Highways Impact	Amber	Within Highways England Zone 2 - A14 West Limited capacity for growth
Employment	-	-
Green Belt – Assessment of Harm of Green Belt Release	-	Parcel ID: -

Available (Outcome = Green)

Question	Response
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The site was submitted by the landowner and/or site promoter who has confirmed that the site is available for development in the timescales indicated.
Are there known legal or ownership impediments to development?	No
Is there planning permission to develop the site?	No relevant recent planning history
When will the site be available for development?	0-5 Years

Achievable (Outcome = Green)

Question	Response
Is there a reasonable prospect that the site will be developed?	The land has been promoted by the landowner and or developer and is known to be available for development. The site has a low existing use value and non-residential development is likely to be economically viable at an appropriate density.

Development Potential

Capacity and Delivery	Response
-----------------------	----------

Estimated dwellings per hectare	0
Estimated dwelling units	0
Estimated employment space (m ²)	526000
Estimated start date	0-5 Years
Estimated annual build-out rate (pa)	40-75
Development completion timescales (years)	0-5 Years



Appendix 3: Lichfields' HELAA Site Assessment Update

Greater Cambridge Local Plan Preferred Options Representation: Appendix 3- Lichfields' HELAA Site Assessment Update

[illegible]

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
Landscape and Townscape	Red National Character Area 88 Bedfordshire and Cambridgeshire Claylands District Character Area: Fen Edge. The Site is generally typical of this characteristic, though recently damaged/ altered due to highways improvements to A14. <u>Landscape Character Assessment (2021)</u> Landscape Character Area- 2A: Longstanton Fen Edge Claylands The site has experience considerable change due to the nearby A14 upgrade works. The landscape character of this area has undergone disruption and is degraded due to the intrusion of a major transport route. Development of this site would further degrade the landscape character of the area. Limited low- level development could be achieved if focused nears the existing developed Area and well buffered. Green	FPCR find that the Greater Cambridge Landscape Character Appraisal identifies that around half of the GC landscape is of better condition and stronger in character than the other half. The Site lies within the landscape of relatively poorer condition and weaker character. The Site is well contained to the north west, south west and south east by surrounding roads which have recently undergone major construction works, the A14 works detracting locally from the landscape. There is minimal or no discernible intervisibility between nearby settlements and the Site. The preliminary assessment of the Landscape Value, Susceptibility to Change and Landscape Sensitivity of the site and its immediate context, indicates that these are all likely to be judged as Low/ Medium and no more than Medium. In landscape and townscape terms, the site has the potential to successfully assimilate future development as part of a comprehensive design solution, encompassing conserved and new landscape and habitat proposals and appropriate development parameters. Based upon the Council's HELAA 'scoring' assessment, FPCR adjudge that this Site should have been assessed as Green in Landscape. Whilst potential future development is likely to result in some adverse landscape effects, these effects are capable of being mitigated and minimised and existing landscape features within the site are capable of being conserved and extended as the basis for a robust landscape framework and setting to future development."	
Biodiversity and Geodiversity	Amber	Consultation with Natural England unlikely to be required (unless residential). Hedgerows, woodland, mature trees and watercourses may qualify as priority habitat/Habitats of Principal Importance and support protected/notable species. Otherwise likely to be of low ecological value (arable). Buildings and mature trees may support roosting bats (if suitable). Records of bats (including barbastelle), water vole and otter within site. Farmland bird populations may be present.	FPCR, supported by a Phase 1 Habitat Survey, Desktop Survey and Protected Species Survey (wintering birds, ground tree assessment for bats & badger survey) and Biodiversity Net Gain calculation spreadsheet, identify that no statutory or non-statutory sites of nature conservation importance lie within 5km, 2km or 1km of the site. There are a number of protected/notable species records that fall within the site boundary including badger, otter, water vole, common lizard and barbastelle bat among others. None of the on-site habitats are listed as a Priority Habitat by The Cambridgeshire and Peterborough Biodiversity Action Group. The proposal allocation would be capable of achieving a c.12% biodiversity net gain on site (using DEFRA 3.0), retaining the majority of existing habitats of greater ecological value, with a

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
	Amber	Development of the site would not have a detrimental impact on any designated site, or those with a regional or local protection.	significant area (30ha) of new habitats. Further work is being completed to identify the best method to deliver an addition 8% increase to deliver a 20% net gain. FPCR therefore conclude that the assessment score should be Amber .
Open Space/ Green Infrastructure	Green Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	No Technical Report has been prepared as the GC Assessment score was Green .
Historic Environment	Amber Green	Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated.	RPS identify there are no designated or non-designated built heritage assets within the site. One designated built heritage asset lies within 1km (situated a short distance to the southwest), the Grade II listed structure: <i>"Milestone about 100 yards south east of turn to Bar Hill"</i> - a 19th century cast iron triangular milestone (NHLE Entry number 1127302). RPS find that, notwithstanding the current uncertainty over its condition following the recent A14 Improvement works, the significance of this asset does not rely on the Site and determines that the asset is not sensitive to effects from future development within the Site. Within a wider buffer zone of 1km to 2km, there are 33 further designated built heritage assets: thirty-one Listed Buildings - generally located within the historic village cores of Lolworth, Dry Drayton, Oakington & Longstanton, and two Conservation Areas - in Oakington and Longstanton. RPS find that, whilst development within the Site may be distantly visible (more than 1.5km away) from the southeast part of Longstanton Conservation Area or from some of the Listed Buildings, this is not assessed as causing any harm to their heritage significance or to the contribution setting makes to this significance. Any potential impact on the wider setting of these heritage assets can be mitigated by landscaping and design measures. RPS therefore conclude that the assessment score should be Green .
Archaeology	Amber	Development of the site could have a detrimental impact to archaeology. Further information regarding the extent and significance of archaeology would be required. Archaeological works could be secured by condition of planning permission Extensive settlement of Iron Age and Roman date known in the area.	RPS identify a number and range of archaeological surveys and trial investigation works have been carried out within the site and the surrounding area, including a field survey in 1989 covering the entirety of the Site, and programmes of trial trenching and localised geophysical surveys. There are a number of known non-designated heritage assets within the site: important Mesolithic and Roman period remains – located in the eastern third of the site.

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
	Amber		RPS conclude that the site has a moderate to high potential for the presence of further Mesolithic & Neolithic archaeological remains; a low potential for major Bronze Age remains; a high potential for Iron Age and/or Roman rural remains; a low potential for Saxon period archaeology; and a low potential for Medieval and later evidence other than cultivation remains None of the identified assets would preclude allocation of the Site for major development or would prevent its future development. RPS therefore conclude that the assessment score should be Amber.
Accessibility to Services and Facilities	Amber	-Distance to Primary School: Greater than 1,000m -Distance to Secondary School: Greater than 2,000m -Distance to Healthcare Service: Greater than 720m and Less than or Equal to 2,000m -Distance to City, District or Rural Centre: Greater than 2,000m -Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 720m and Less than or Equal to 2,000m -Distance to Employment Opportunities: Less than or Equal to 1,800m -Distance to Public Transport: Greater than 450m and less than or Equal to 1,000m -Distance to Rapid Public Transport: Greater than 1,800m -Distance to proposed Rapid Public Transport: Greater than 1,800m -Distance to Cycle Network: Greater than 1,600m Adequate accessibility to key local services, transport, and employment opportunities Proposed development would require accompanying local centre / employment	For the HELAA transport assessment criteria, Vectos identify that the accessibility of the site was considered by non-car travel. A range of categories were considered which are generally more applicable to housing sites (including proximity to health, primary and secondary schools as well as proximity to local, city or district centres). Vectos consider that a different set of metrics would be appropriate for employment sites as it is difficult to see how under this assessment any employment site could achieve a green score. Criteria could include proximity to existing and emerging populations, providing opportunity for travel to work by active modes of travel. For the Site Assessment (notwithstanding previous commentary on the assessment criteria), there are two areas where Vectos disagree with the scoring; distance to the cycle network and public transport. In terms of cycling, there is a cycle route running along the southern boundary of the site on the A1307, towards Northstowe and Bar Hill and through the site along the Bridleway. As such a Green score would be applicable with distances less than 800m. The HELAA scores this as Red at greater than 1,600m. Public transport is scored as Amber suggesting distances of between 450m and 1,000m. However, it is understood that bus services travel along the A1307. Introducing a bus stop here would ensure the site falls within 450m of a bus stop and public transport, allowing a Green score to be provided. Finally, it is stated that the 'Proposed development would require accompanying local centre / employment provision, primary school and community centre'. Clearly, such facilities are not required for the intended employment use.
	Assessment criteria not relevant to		

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
	employment sites.	provision, primary school and community centre	Vectos therefore conclude that with proper consideration of criteria that are relevant to employment sites, the site would achieve a higher score.
Site Access	Amber	The proposed site is acceptable in principle subject to detailed design. The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site. The proposed site is acceptable in principle subject to detailed design. The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site.	The site was provided an Amber score meaning there are potential access constraints, but these could be overcome through the development of the scheme. Vectos identify that it is not clear what constraints may have been identified or what, for this or any site, would enable a Green score. Vectos assume that full agreement of the access proposals from the highway authority would be required to enable a Green score to be provided. This would mean a preliminary design to be agreed and passed through a Stage 1 Road Safety Audit. It would also require a Transport Assessment to ensure capacity is suitable. Without the full agreement, the only way a Green score might be achieved is where a site is existing, will not be intensified in terms of its use and access is suitable. Clearly for site promoted through the Local Plan this is entirely unlikely. Vectos agrees with the further commentary for the site which states that <i>'The proposed site is acceptable in principle subject to detailed design'</i>. Vectos, however, disagree with the statement <i>'The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site'</i>. It is not relevant and should be removed as National Highways will not be concerned with the access arrangement in detail as it will be a local highway authority matter. It is also noted that adjacent sites such as Land to the south of the A14 Services, Boxworth does not have such statements attributed to its assessment despite relying almost entirely of vehicle movements taking place via the Strategic Road Network. Without a clear understanding of how sites might achieve a Green score, Vectos consider the Amber score to be appropriate.
Transport and Roads	Red	Remote from any adjacent settlement, sustainability issues (currently proposed for B2/B8) which is possibly more acceptable. Transport Assessment and Travel Plan required).	The site was provided a Red score meaning that the conclusion for this criteria was that the <i>'Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'</i>.

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
	Amber		Vectos find that there is little detail provided to determine how the conclusion was reached. The comments provided state that the site is <i>'Remote from any adjacent settlement, sustainability issues (currently proposed for B2/B8) which is possibly more acceptable'</i>. The above statement is clearly incorrect. The existing Bar Hill settlement is within 1km of the site (measured from centre to centre, note the closest boarders are within 350 metres) and the emerging community at Northstowe with 10,000 homes will be largely within 1 to 2km of the site. Given such distances, Vectos completely disagree with the statement that the site is remote from settlement, rather it is accessible to existing and future communities. The comments also state that a Transport Assessment and Travel Plan is required which if the reference relates to a future planning application is agreed but also applicable to all promotion sites. Given the identified capacity on the local road network which has been recently improved and the accessibility of the site, both of which the HELAA assesses positively elsewhere, it cannot be reasonably concluded that the site 'would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'. Further evidence of this can be drawn by making a comparison against the scoring for the site at Land to the south of the A14 Services, Boxworth. Unlike Bar Hill, Junction 25, the site is scored as Amber and 'No comment' is set out in the wider commentary. The reason for the distinction between the two sites is entirely unclear. Vectos therefore conclude that the assessment score should be Amber.
Noise, Vibration, Odour and Light Pollution	Amber	The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.	To determine baseline conditions, Sharsp Redmore has undertaken a noise survey to determine existing ambient (LAeqT) and background (LA90,T) against which the development will be assessed. Measurements were carried out at multiple locations on and around the site at locations representative of the nearest noise sensitive receptors (NSR) to the site. Existing noise levels are characterised by road traffic on the A14 and local road network. At night activity on the local roads reduce and noise from the A14 dominates. Full details of the survey are included in Appendix A to the note and summarised in Table 1 below.

Issue	GC / LDL Assessment	GC Comments	LDL Assessment																																		
	Green		TABLE 1: Survey Results <table><tr><th rowspan="2">Location</th><th colspan="2">Day time (0700 – 2300 hrs)</th><th colspan="2">Night time (2300 – 0700 hrs)</th></tr><tr><th>L_{AeqT}</th><th>L_{A90,T}</th><th>L_{AeqT}</th><th>L_{A90T}</th></tr><tr><td>NSR1</td><td>66 – 68 dB</td><td>53 – 58 dB</td><td>56 dB</td><td>41 dB</td></tr><tr><td>NSR2</td><td>50 – 56 dB</td><td>48 – 55 dB</td><td>46 – 55 dB</td><td>42 – 54 dB</td></tr><tr><td>NSR3</td><td>57 – 71 dB</td><td>49 – 58 dB</td><td>47 – 66 dB</td><td>44 – 56 dB</td></tr><tr><td>NSR4</td><td>46 – 47 dB</td><td>41 – 46 dB</td><td>41 – 42 dB</td><td>39 – 40 dB</td></tr><tr><td>NSR5</td><td>54 – 69 dB</td><td>50 – 58 dB</td><td>51 – 60 dB</td><td>44 – 57 dB</td></tr></table> In terms of operational noise, the key impacts from industry and warehousing uses would be noise from fixed mechanical plant serving the units, service yard activity and noise break-out from units. Operational vibration is not considered, as this will have no impact. Sharps Redmore therefore conclude that the assessment score should be Green	Location	Day time (0700 – 2300 hrs)		Night time (2300 – 0700 hrs)		L _{AeqT}	L _{A90,T}	L _{AeqT}	L _{A90T}	NSR1	66 – 68 dB	53 – 58 dB	56 dB	41 dB	NSR2	50 – 56 dB	48 – 55 dB	46 – 55 dB	42 – 54 dB	NSR3	57 – 71 dB	49 – 58 dB	47 – 66 dB	44 – 56 dB	NSR4	46 – 47 dB	41 – 46 dB	41 – 42 dB	39 – 40 dB	NSR5	54 – 69 dB	50 – 58 dB	51 – 60 dB	44 – 57 dB
Location	Day time (0700 – 2300 hrs)		Night time (2300 – 0700 hrs)																																		
	L _{AeqT}	L _{A90,T}	L _{AeqT}	L _{A90T}																																	
NSR1	66 – 68 dB	53 – 58 dB	56 dB	41 dB																																	
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NSR3	57 – 71 dB	49 – 58 dB	47 – 66 dB	44 – 56 dB																																	
NSR4	46 – 47 dB	41 – 46 dB	41 – 42 dB	39 – 40 dB																																	
NSR5	54 – 69 dB	50 – 58 dB	51 – 60 dB	44 – 57 dB																																	
Air Quality	Amber <																																				

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
	Green		1. Preliminary Risk Assessment (Feb 20): Site has remained undeveloped throughout its history with the exception of localised tree planting and the construction of hardstanding access routes. Therefore, there is no known previous development on the site which might have caused a contamination risk. 2. Infiltration test trial pits (Feb 20). Relatively consistent natural ground conditions across the Site with typically 1.5-2.0m of loose-dense sandy clays and gravels overlying firm to stiff Kimmeridge Clay. No imported fill materials were encountered nor any signs of soil or groundwater contamination. 3. Borehole testing of deeper ground conditions (Sept/Oct 20): The ground conditions encountered were very similar to those in the previous trial pits in 2. above with again no imported fill material encountered nor any signs of soil or groundwater contamination. 4. Borehole testing of groundwater (Sept 21): Ten boreholes to 5.0m depth were sunk across the site for the purposes of ground water monitoring over a period of at least 12 months. Again, the soil and ground water conditions were very similar to the previous investigations with no indications of imported fill materials nor any signs of soil or ground water contamination. MJM Environmental Consulting Engineers therefore conclude that the assessment score should be Green.
Further Constraints			
Constraints to development	-	Agricultural Land Classification: 74% Grade 2; 26% Grade 3 Watercourse crosses the site Public Right of Way is on or crosses the site	We understand that the original Land Classification Survey for the site found that c.26% of the site was Grade 2 and 74% was Grade 3. Therefore, the Grade 2 and Grade 3 scores are the wrong way round in the HELAA.
Strategic Highways Impact	Amber	Within Highways England Zone 2 - A14 West Limited capacity for growth	Vectos identify that the site was provided an Amber score due to its location within Highways England Zone 2 - A14 West and meaning there is considered to be limited capacity for growth. It is unclear what models or data was used in order to determine the relative capacity of the Strategic Road Network across the area. The Zone within which the site is located suggests some, albeit limited capacity for growth. Whilst the conclusion is somewhat surprising given the recent improvements to the A14 in this area and Junction 25, this allows a later assessment to confirm the suitability of the site and proposals and this therefore considered suitable.

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
	Amber		Vectos therefore conclude that the Amber score is appropriate given that further assessment work is required.
Employment	-	-	
Green Belt- Assessment of Harm of Green Belt Release	-	Parcel ID:-	

Appendix 4: HELAA Technical Appraisal Reports, including:-

- i Flood Risk Technical Appraisal Report, prepared by MJM Consulting Engineers
- ii Landscape and Townscape Technical Appraisal Report, prepared by FPCR
- iii Biodiversity and Geodiversity Technical Appraisal Report, prepared by FPCR
- iv Historic Built Environment Technical Appraisal Report, prepared by RPS
- v Archaeology Technical Appraisal Report, prepared by RPS
- vi Accessibility to Services and Facilities Technical Appraisal Report, prepared by Vectos
- vii Site Access Technical Appraisal Report, prepared by Vectos
- viii Transport and Roads Technical Appraisal Report, prepared by Vectos
- ix Noise, Vibration, Odour and Light Pollution Technical Appraisal Report, prepared by Sharps Redmore
- x Air Quality Technical Appraisal Report, prepared by Redmore Environmental
- xi Contamination and Ground Stability Technical Appraisal Report, prepared by MJM Consulting Engineers
- xii Strategic Highways Impact Technical Appraisal Report, prepared by Vectos
- xiii Agricultural Land Survey and Map, prepared by Ministry of Agriculture, Fisheries and Food

Date: 01/11/2021

Ref: 7437/CRS

Proposed Development at Slate Hall Farm, Barhill, Cambridge

Flood Risk

The assessment from Greater Cambridge assesses the site as **Amber** risk with regards to Flood Risk. The site plan included in the assessment includes Slate Hall Farm in the centre of the site but it should be noted that the proposed development site does not include Slate Hall Farm

The assessment also states that the site area is 107.48 ha when in fact it is 100ha. Presumably the 107.48 ha includes Slate Hall Farm

In order to assess the flood risk MJM have prepared the attached drawings .

Drawing no 7437-MJM-00-00-DR-C-5260-S2-P01

This drawing shows the site boundary in red with Slate Hall farm excluded and shows the outlines of Flood Zone 3 (1:1000 year AEP risk) in dark blue with additional areas of Flood Zone 2 (1:100 year AEP risk) in lighter blue.

These outlines have been taken from the EA Flood Map for Planning.

The assessment from Greater Cambridge states that 16% of the site is in Flood Zone 3 whereas our calculations show that the area is less at 13.3%, presumably due to Slate Hall Farm not being included. The assessment also states that 19% of the site is in Flood Zone 2 whereas our calculations show that the area is again less at 16.8%.

Drawing no 7437-MJM-00-00-DR-C-5262-S2-P01

This drawing is similar to the above but this time shows areas of Flood Zones 2 and 3 based on detailed hydraulic modelling of the site by the specialist engineering and environmental consultancy RSK

This shows that the area of site in Flood Zone 3 is only 0.44% and in Flood Zone 2 is only 2.72%. Both of these areas are very much less than the areas taken from the EA flood maps which by their nature are more general and non site specific.

It should also be noted that the only areas at risk of flooding are adjoining Oakington Brook. These areas are not proposed for development and will be set aside for areas of bio-diversity net gain and so will not present any risk to the areas proposed for development

Drawing no 7437-MJM-00-00-DR-C-5261-S2-P01

This drawing is again similar to those above but this time shows areas of the site at risk from surface water flooding taken from the EA maps for a 1:30 year risk in dark blue; a 1:100 year risk in turquoise and 1:1000 year risk in light blue

The assessment from Greater Cambridge states that 2% of the site lies in a 1:30 year event which our calculations agree with at 2.08%

The assessment also states that 6.0% of the site lies in the 1:100 year event which is close to our assessment of 5.49%

Lastly the assessment states that 21% of the site lies in the 1:1000 year event whereas our calculations indicate 18.3%

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The two assessments of the areas of the site at risk from surface water flooding are therefore in reasonable agreement .
However again it is only the areas immediately adjacent to Oakington Brook that are at risk.
The other areas indicated remote from the Brook actually represent local natural topographic features such as shallow depressions and do not represent existing watercourses or ponds that may flood
The existing levels in these areas would all be altered by the proposed development so any risk from surface water would therefore be removed or taken into account in the new drainage systems.

Therefore the actual areas of the site at any risk from surface water flooding are very much less than the areas from the EA maps and are confined to areas adjacent to Oakington Brook which as stated above will not be developed .

Therefore it is our firm view that these site specific flood risk assessments provide clear evidence that the site should be assessed as **Green** rather than **Amber** with regards to Flood Risk

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J25 Bar Hill

LANDSCAPE AND VISUAL APPRAISAL NOTE

December 2021

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FIGURES

Figure 1: Site Location and Context

Figure 2: Aerial Photograph

Figure.3: Landscape Character

Figure 4: Environmental Designations and Policies

Figure 5: Topography

1.0 INTRODUCTION

- 1.1 This Landscape and Visual Appraisal (LVA) Note has been carried out for the site at J25 Bar Hill. It has been undertaken by FPCR Environment and Design Ltd (FPCR). The purpose of this LVA Note is to provide a preliminary landscape and visual review and appraisal of the site for potential future development and to consider and appraise the site suitability assessment undertaken by Greater Cambridge, as detailed in the Greater Cambridge (GC) Housing and Economic Land Availability Assessment (HELAA).
- 1.2 FPCR is a multi-disciplinary environmental and design consultancy established over 60 years, with expertise in architecture, landscape, ecology, arboriculture, urban design, masterplanning and environmental impact assessment. The practice is a member of the Landscape Institute and Institute of Environmental Management and Assessment and is frequently called upon to provide expert evidence on landscape and visual issues at Public and Local Plan Inquiries.
- 1.3 Figures 1 and 2 show the location and general context of the Site.

2.0 METHODOLOGY

- 2.1 For the purposes of this LVA review and appraisal the approach adopted is based upon the *Guidelines for Landscape and Visual Impact Assessment*, third edition (GLVIA3), published by the Landscape Institute and the Institute of Environmental Management and Assessment, in 2013. This has entailed desk based and field survey and analysis to provide a suitably robust understanding of the existing landscape character and visual amenity of the site and its context.
- 2.2 In terms of baseline studies, the assessment provides an understanding of the landscape that may be affected, its constituent elements, character, condition and value. For the visual baseline, this includes an understanding of the area in which the site and potential future development within it may be visible, the people who may experience views, and the nature of those views.

3.0 BASELINE CONDITIONS

Greater Cambridge Landscape Character Assessment (GCLCA) (February 2021)

- 3.1 Within this recently published study the Site lies at the southern extent of Landscape Character Area (LCA) 2A: *Longstanton Fen Edge Claylands*. Figure 3 details the Greater Cambridge LCAs in relation to the Site and its context.
- 3.2 LCA 2A: *Longstanton Fen Edge Claylands* is described within the study as a gently undulating, open and settled landscape. The description for this LCA also states;

'...Vegetation is sparse, but scatterings of tree clumps, shelterbelts around isolated farms and occasional hedgerows sometimes merge together to give the sense of a more densely treed horizon, notably on the edge of villages and farms where they provide localised visual enclosure.

....The largely flat landscape and sparse vegetation combine to offer long, open views between settlements, in which large, dramatic skies are a prominent feature. Occasional vertical features stand out on the skyline, including masts and poles related to the communications network, church spires and lines of willow trees. The straight A14 dual carriageway, which forms the southwestern boundary to the LCA, detracts locally from the tranquillity experienced elsewhere.'

- 3.3 Under 'Evaluation' the following single sensitivity specific to this LCA is identified as;
- *Long, open views from villages across open, arable fields.*
- 3.4 The study also identifies a single landscape guideline specific to this LCA, as;
- *Ensure new development is integrated into the landscape sympathetically and does not affect long, open views.*
- 3.5 This study evaluates the Condition and the Strength of Character of the Landscape Character Types across the Greater Cambridge area (See GCLCA; Figures 4.2 and 4.3; page 31). For the Fen Edge Claylands LCT, within which the Site is located, the study assesses both the Condition and Strength of Character to be *Moderate*.
- 3.6 In relative and comparative terms, it should be noted that of the 9 LCT's across the GC area, 5 LCT's are assessed to be in *Moderate* Condition and 4 LCT's are assessed to be in *Good* Condition. Within the study *Good* is considered to be better than *Moderate* in terms of the assessment of Condition. Similarly, for the assessment of the Strength of Character, 4 LCT's are assessed to be *Moderate* and 5 LCT's are assessed to be *Strong*. Again, within the study *Strong* is considered to be better than *Moderate* in terms of the assessment of Strength of Character.
- 3.7 In broad terms, the study identifies that around half of the GC landscape is of better condition and stronger in character than the other half. The Site lies within the landscape of relatively poorer condition and weaker character.
- 3.8 It is however acknowledged that this is not a site specific evaluation and that both Condition and Strength of Character will vary across these LCT's and also across the LCA's.

Landscape of the Site and its Context

- 3.9 The Site comprises predominantly flat arable fields subdivided principally by a limited number of lines of mature trees, a small watercourse (with associated planting) and a small number of semi mature tree belts to a field parcel in the north of the Site. Figure 5 details the topography of the Site and its context. The fields are generally medium in size and arranged in a fairly regular pattern with the lines of individual trees generally arranged in straight lines across the site. The exception to this is the small watercourse and associated trees and habitats that follows a more irregular line across the southern part of the Site.
- 3.10 An existing commercial area with workshop type buildings and areas of hard standing occupies a position within and effectively surrounded by the Site. This area sits directly north of an area of plantation woodland that also sits along the northern side of the small watercourse. It is accessed via a small road from Dry Drayton Road on the southern edge of the Site. A further small commercial area lies on the north western edge of the site within a strip of land lying alongside the southern side of the B1050.
- 3.11 The Site is well contained to the north west, south west and south east by surrounding roads which have recently undergone major construction works. The A14 and A1307 stretch across the south western side of the site and impart a strong active influence. Major junctions and road crossings also lie immediately to the south and west of the Site and are also constitute notable infrastructure features. A recently completed cycleway/ bridleway bridge crossing of the A14 close to the A14 Bar Hill junction adds to the major transport infrastructure. This cable stayed bridge includes uprights believed to be approximately 30 metres high.

- 3.12 The north eastern Site boundary is defined by a combination of field boundary hedgerows and ditches. Further new road infrastructure in the form of a link road to the new settlement of Northstowe does however lie close to the north of this site boundary.
- 3.13 This arrangement of largely major and new roads and transport infrastructure surround and physically contain the majority of the Site and have a notable influence on its character and appearance.
- 3.14 To the south west of the Site beyond the A14 lies the settlement of Bar Hill. This planned settlement comprises dwellings of generally an even age arranged in a series of cul de sacs off a series of spine roads extending from an outer loop road. Employment uses are sited in the north of the settlement close to and alongside the A14 and Bar Hill junction. The settlement occupies rising ground and includes a golf course on its north eastern side. Mature trees and planting extend throughout the course and in combination with other mature wooded areas and trees within and around the Bar Hill settlement area, it provides visual separation to the A14, the Site and the landscape to the north. Thus, Bar Hill and its mature wooded setting reinforces the strong landscape boundary to the south west, where this landscape beyond the A14 acts as a backdrop and limits views.
- 3.15 Other settlements at Oakington and Longstanton lie respectively to the east and north of the Site yet have minimal or no discernible intervisibility with the Site.

Landscape Designations and Value

- 3.16 The Site and its immediate context includes no designated landscapes or features and no landscapes recognised of being of any particular higher value or sensitivity. Figure 4 details Environmental Designations and Policies within the context of the Site.
- 3.17 Whilst a detailed appraisal of the Landscape Value of the Site and its immediate context has not been undertaken at this stage, a preliminary assessment indicates that this is likely to be Low/Medium, yet with the existing mature trees and planting associated with the watercourse representing features of relatively higher value in localised landscape terms.

4.0 ANALYSIS OF THE GC HELAA ASSESSMENT OF SITE 40248 (LAND AT SLATE HALL FARM, BAR HILL, CB23 8HB)

Introduction

- 4.1 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (Sept 2021) appraises the Site (as Site 40248 (Land at Slate Hall Farm, Bar Hill, CB23 8HB)). Annex 1 of the HELAA details the methodology adopted in terms of appraising the suitability of sites. A 'traffic light' scoring approach is adopted that is defined as follows for '*Landscape and Townscape*' suitability;

Score	Assessment Criteria
Red	Development of the site would have a significant negative impact which cannot be mitigated.
Amber	Development of the site would have a detrimental impact which could be satisfactorily mitigated.
Green	Development of the site would have either a neutral or positive impact.

- 4.2 The notes accompanying the above table provide some brief supporting detail on the approach adopted yet this principally appears to be by reference to the presence of mapped constraints and designations (excluding Green Belt) and to the GCLCA and other studies. It does not detail how the potential impacts or the potential for mitigation and acceptability of a development were assessed.

Approach

- 4.3 Drawing upon the methodology detailed in GLVIA3, an appraisal of the Site has been undertaken to appraise the suitability of the Site in 'Landscape and Townscape' terms for future development. At this stage, this is not a detailed and scheme specific assessment. It has appraised the potential and capacity of the site to be able to accommodate future employment development. This appraisal has entailed desk based and site based assessments and has considered the landscape character and features of the site and its context. This preliminary assessment has also considered the Landscape Value, Susceptibility to Change and Landscape Sensitivity of the site and its immediate context.

Appraisal

- 4.4 The site occupies a relatively well defined and contained position on the southern edge of LCA 2A *Longstanton Fen Edge Claylands*. The majority of the site is strongly influenced by the adjacent active A14 and associated infrastructure and the A1307 on its south western side. Other roads and road junctions extend close to the north west and south east site boundaries and reinforce its containment in landscape terms. As recognised in the GCLCA, the A14 detracts locally from the landscape.
- 4.5 At a localised level, the site is relatively visually removed and separated from the majority of LCA 2A, that stretches across a more expansive and open landscape area to the north of the site. In this regard the site does not readily contribute to or form part of the longer open views. The single specific landscape sensitivity identified for LCA 2A is the '*long, open views from villages across open, arable fields*'. The site and potential development within it, is unlikely to result in any notable effects upon the long open views from villages. Where any potential views from villages towards future development on the site may be possible these are likely to be very limited and restricted. Any available glimpsed or partial views are also likely to perceive development on the site at distance and set back against the A14 road corridor and the mature trees and planted surrounds to Bar Hill. Potential future development on the site is unlikely to obstruct or curtail any long open views from villages across open arable fields to any more than a limited and localised extent.
- 4.6 The most positive and notable landscape features within the site comprise the small watercourse and the mature trees that exist both along the watercourse and lining some of the field boundaries. These are localised landscape features that can be successfully conserved and enhanced where appropriate, as part of a suitable future development solution. The location and alignment of the watercourse and existing trees (many in a limited number of straight lines) can also help to form the basis of a strong landscape framework for a future development scheme. These features in conjunction with other new native planting and habitats would also assist in enhancing the overall biodiversity value of the site.
- 4.7 The preliminary assessment of the Landscape Value, Susceptibility to Change and Landscape Sensitivity of the site and its immediate context, indicates that these are all likely to be Low/ Medium

and no more than Medium. A full and detailed assessment of these landscape considerations would be undertaken in due course as part of progressing a suitable development and landscape scheme for the site.

- 4.8 In landscape and townscape terms, the site clearly has the potential to successfully assimilate future development as part of a comprehensive design solution, encompassing conserved and new landscape and habitat proposals and appropriate development parameters.

Consideration of the GC HELAA Assessment of Site 40248 (Land at Slate Hall Farm, Bar Hill, CB23 8HB)

- 4.9 The Council's assessment of the site has been appraised as part of this preliminary landscape and visual review. It has been assessed by the Council as Site 40248 (Land at Slate Hall Farm, Bar Hill, CB23 8HB). For ease of reference, the Council's Site Assessment on 'Landscape and Townscape' states in full the following;

"NCA 88 Bedfordshire and Cambridgeshire Claylands

District Character Area: Fen Edge

The Site is generally typical of this characteristic, though recently damaged/altered due to highways improvements to A14

Landscape Character Assessment (2021) Landscape Character Area - 2A: Longstanton Fen Edge Claylands

The site has experience considerable change due to the nearby A14 upgrade works. The landscape character of this area has undergone disruption and is degraded due to the intrusion of a major transport route. Development of this site would further degrade the landscape character of the area. Limited low-level development could be achieved if focused near the existing developed area and well buffered."

- 4.10 The outcome of Council's Landscape and Townscape Assessment is a judgement/ score of Red. ie 'Development of the site would have a significant negative impact which cannot be mitigated.'
- 4.11 The Council's analysis is very brief and whilst it indicates that the site is generally typical of the District Character Area, it principally highlights the disruption, damage and degrading effects of the highway improvements to the A14. Rather than drawing upon these major highway changes in appraising the existing character, value and sensitivity of the site, the Council's assessment simply advises that development on the site would further degrade the landscape character of the area. This is not how potential future development on the site should be appraised and this premise is wholly unjustified.
- 4.12 It is evident that the A14 does impart a notable and active influence over the site and this should properly be considered as part of the baseline situation. It does inform the existing character, value and sensitivity of the landscape and should not be taken as a bar to any future development.
- 4.13 The Council's analysis does however indicate that 'limited low-level development could be achieved if focussed near the existing developed area and well buffered' yet it offers no reasoning to support this judgement.
- 4.14 Contrary to the Council's very brief analysis, this preliminary landscape and visual appraisal confirms that the site could successfully accommodate future development on the site. This would

be founded upon and shaped by the existing landscape character and features and would include a strong landscape framework.

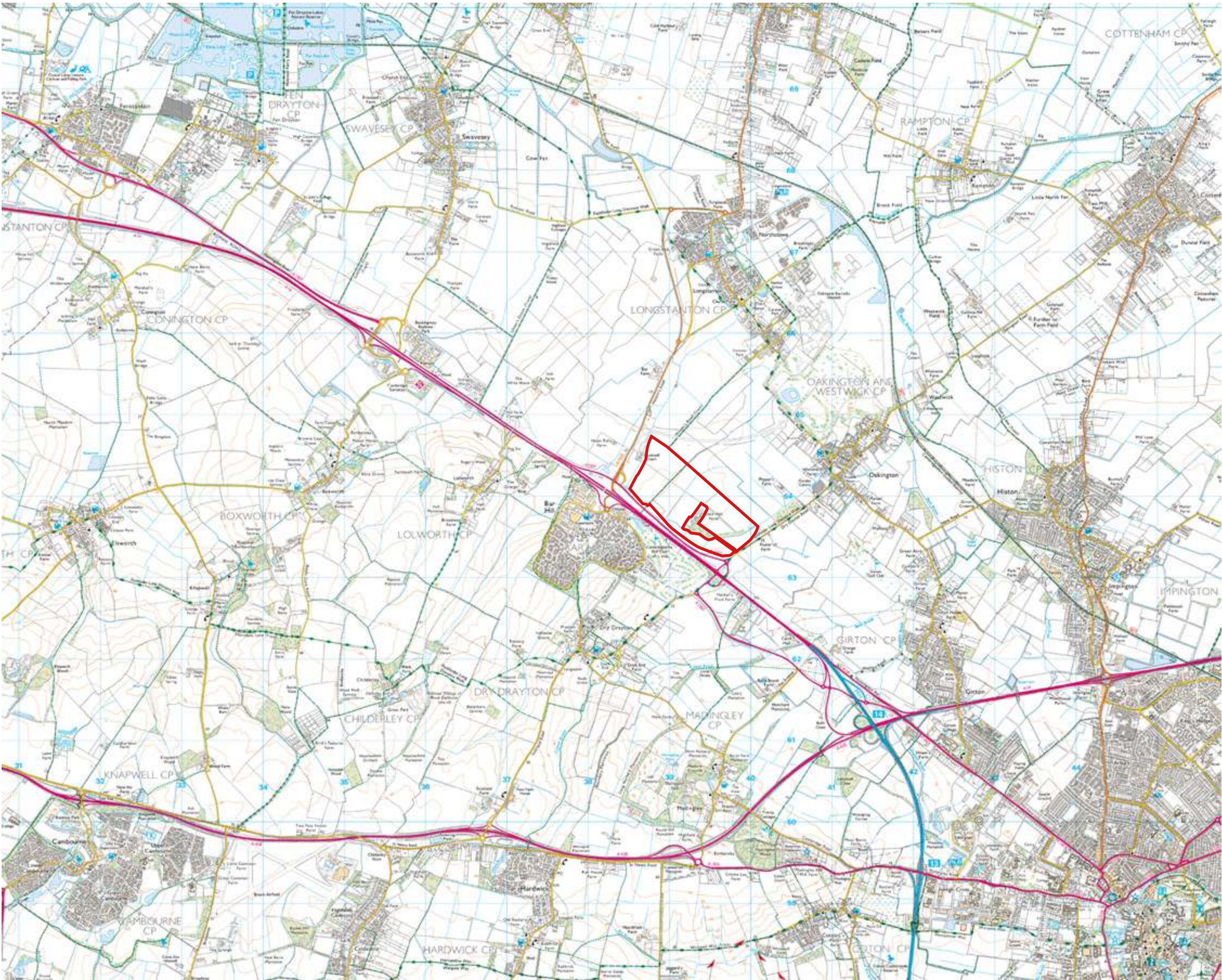
- 4.15 In the context of considering the Council's assessment of the site, it also relevant to note their '*Landscape and Townscape*' assessment of an adjoining site, immediately to the north west. This adjoining site is referred to in the HELAA as, '*Land at Hazlewell Farm, Lolworth, CB23 8DS; Site Reference: 52680*'
- 4.16 Under the *Landscape and Townscape* Assessment for Site 52680, the HELAA confirms that this site is generally typical of the District Character Area. This is the same District Character area and comment, as from Site 40248. The comments for Site 52680 does then state; '*Employment development upon this site would have a limited impact to the landscape subject to landscape mitigation measures and accord with Buckingway Business Park landscape principles. Typical landscape measures would include the following: a significant landscape buffer of approx. 15m wide to be provided around the site to reduce the visual harm, building scale and mass to reflect existing local commercial build and existing linear drainage ditches to be protected and retained.*'
- 4.17 This indicates that employment development on this site would have limited impact to the landscape subject to landscape mitigation measures, including a 'significant' landscape buffer of 15m wide. It makes no reference to the considerable change from the nearby A14 and junction works and by contrast with Site 40248 it assesses this site as Green ie '*Development of the site would have either a neutral or positive impact.*'
- 4.18 Whilst it is recognised that Site 52680 is smaller than Site 40248, it does nevertheless occupy not only the same District wide landscape character area but also the same localised landscape context. There is no apparent reasoning or justification why Site 52680 should score '*Green*' and the adjoining Site 40248 should score '*Red*'. This places the adjoining Sites at the opposite ends of the assessment scale, which does appear to belie both the GCLCA study and a more detailed site based assessment of this particular local landscape.

HELAA Site Review Conclusions

- 4.19 Based upon the Council's simple 'scoring' assessment, the Site (40248) should have been scored/ assessed as either '*Green*' or '*Amber*' in Landscape and Townscape terms.
- 4.20 Based upon the Council's '*Green*' assessment of the adjoining site (52680); the existing A14 and other influences and its landscape sensitivity; and the fact that the existing positive features (eg mature trees and watercourse) could be substantially conserved and enhanced with significant landscape buffers provided, then the Site (40248) could justifiably be scored/ assessed as '*Green*'.
- 4.21 Whilst potential future development on the site is likely to result in some generally localised landscape adverse effects, it is clear from a sufficiently detailed assessment (including a site based appraisal) that these effects can be mitigated and minimised. It is also clear that existing landscape features within the site can be conserved and extended as the basis for a robust landscape framework and setting to future development.

5.0 CONCLUSION

- 5.1 The GCLCA identifies that around half of the GC landscape is of better condition and stronger in character than the other half. The Site lies within the landscape of relatively poorer condition and weaker character.
- 5.2 The Site is well contained to the north west, south west and south east by surrounding roads which have recently undergone major construction works; the A14 works detracting locally from the landscape. Further containment is provided by existing trees, hedgerows and other planting surrounding the Site and by the rising landform and further trees and planting around Bar Hill to the south west of the A14. There is minimal or no discernible intervisibility between nearby settlements and the Site.
- 5.3 The preliminary assessment of the Landscape Value, Susceptibility to Change and Landscape Sensitivity of the site and its immediate context, indicates that these are all likely to be Low/ Medium and no more than Medium.
- 5.4 Whilst potential future development on the Site is likely to result in some generally localised adverse landscape effects, these effects are capable of being mitigated and minimised as part of a comprehensive development solution. The existing features of relatively greater landscape value (eg mature trees and watercourse) within the Site are capable of being conserved and extended as the basis for a robust landscape framework and setting to future development.
- 5.5 In landscape and townscape terms, the site has the potential to successfully assimilate future development as part of a comprehensive design solution, encompassing conserved and new landscape and habitat proposals and appropriate development parameters.



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client
Lolworth Developments Ltd

project
**J25 Bar Hill,
Cambridge**

drawing title
SITE LOCATION & CONTEXT

scale
1:50,000 @ A3
drawing / figure number

drawn
DB / TRJ

issue date
07 October 2021
rev

Figure 1



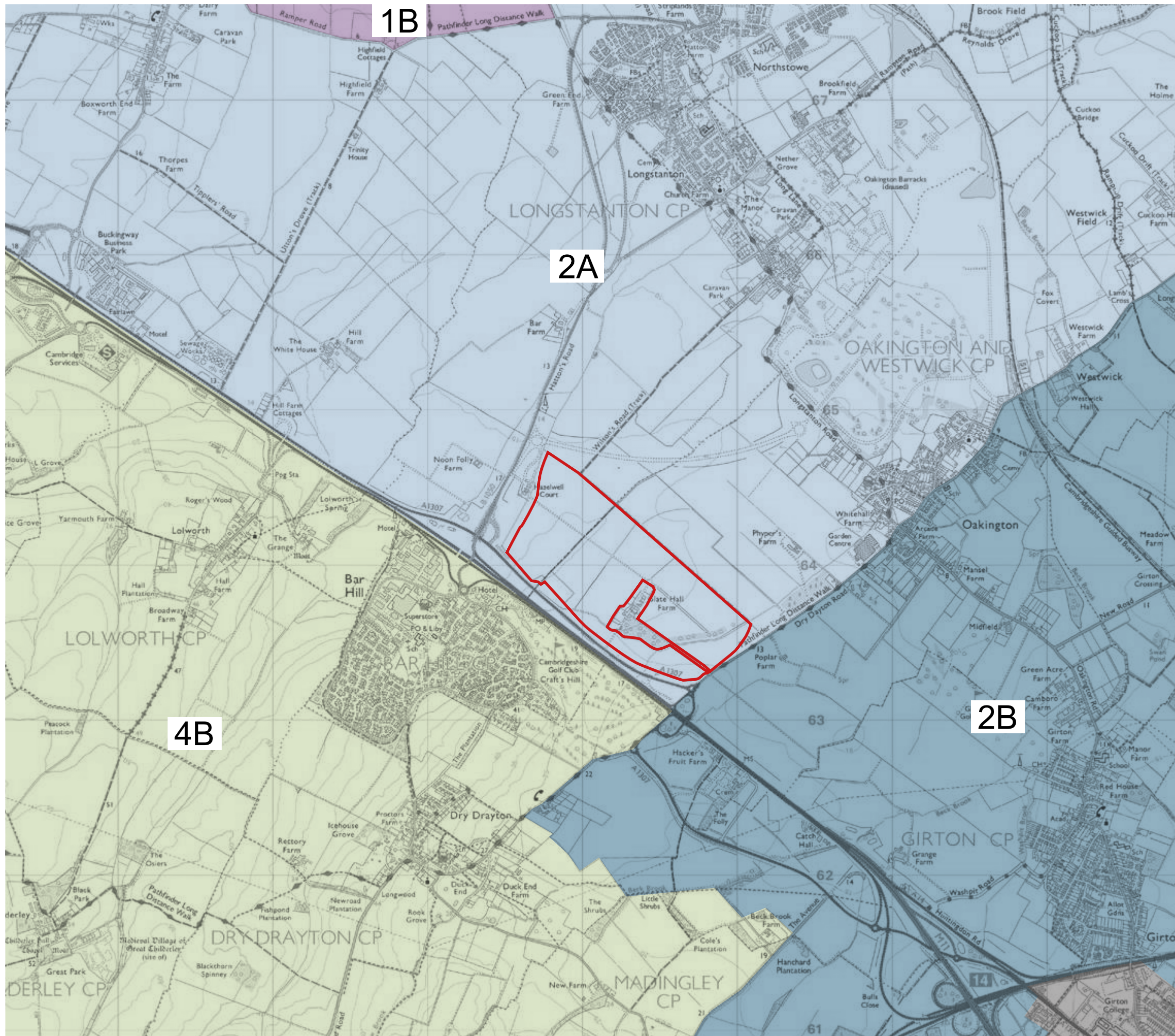
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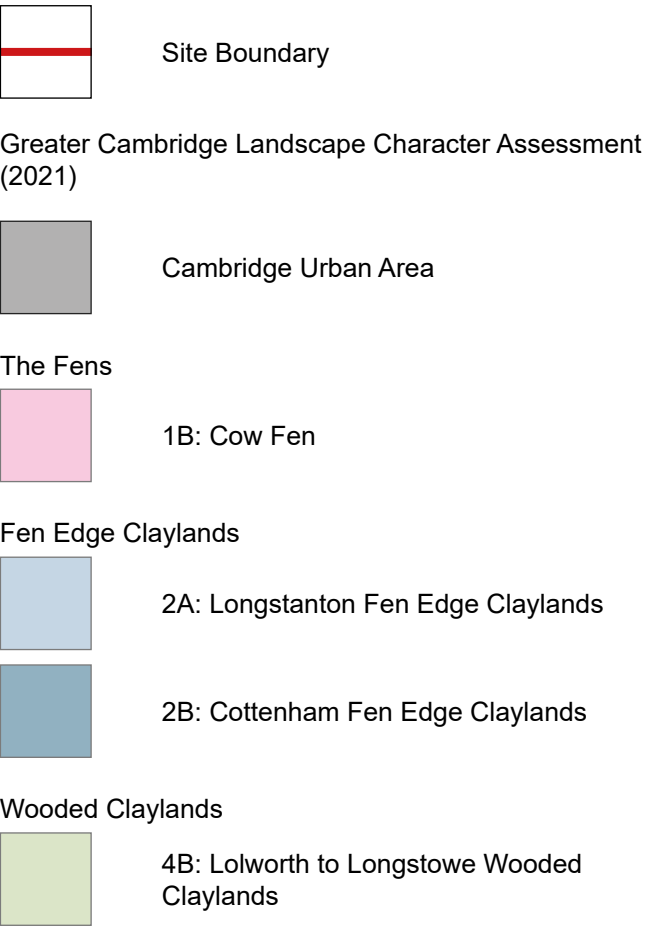
Site Boundary





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Note:
Study area sits wholly within NCA 88: Bedfordshire and Cambridgeshire Claylands.



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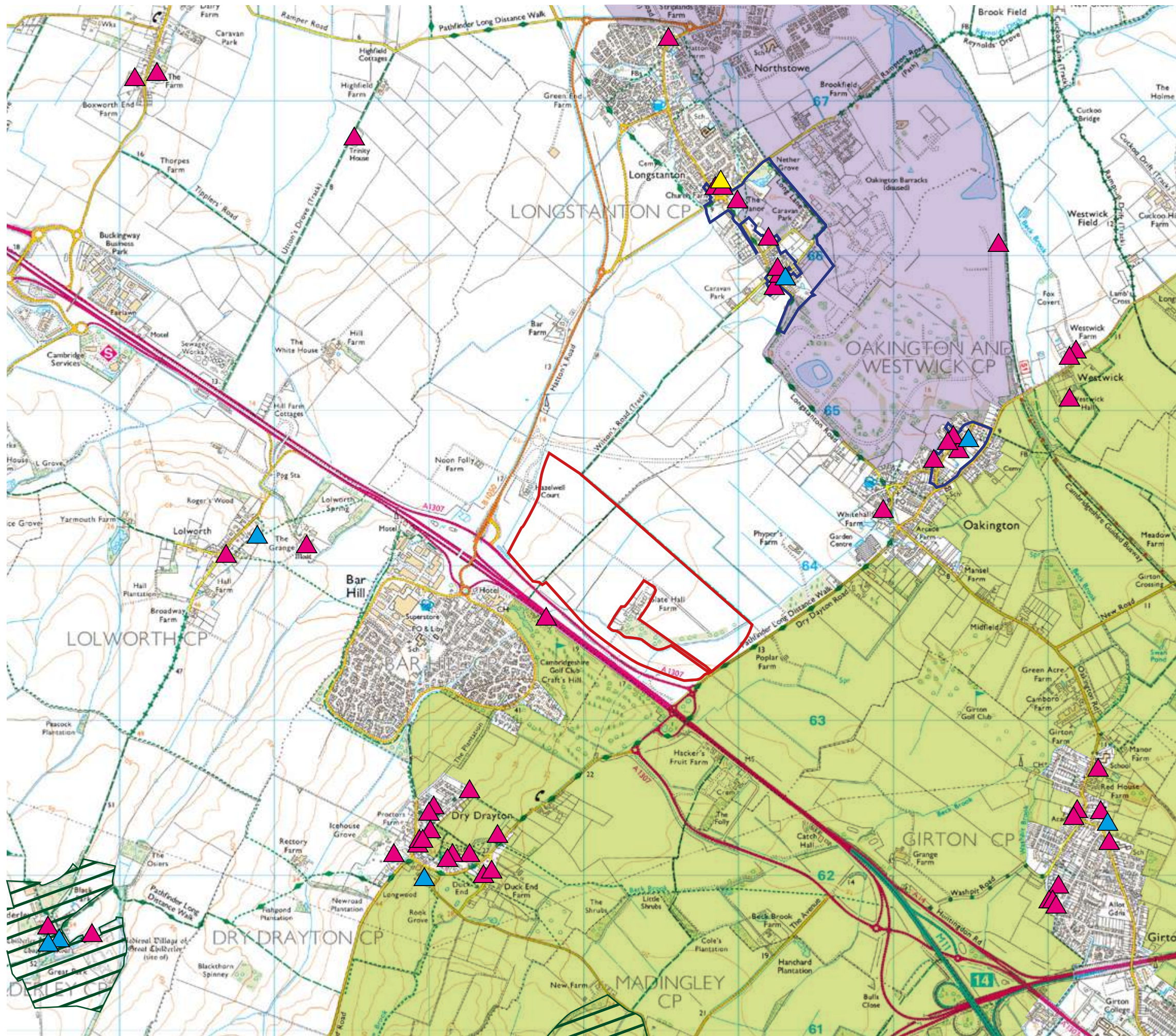
drawing title
LANDSCAPE CHARACTER

scale
1:25,000 @ A3
drawing / figure number

drawn
DB / TRJ

issue date
07 October 2021
rev

Figure 3



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-  Site Boundary
-  Grade I Listed Building
-  Grade II Listed Building
-  Grade II* Listed Building

South Cambridgeshire Adopted Policies Map February 2019

-  Green Belt
(Policy S/4)
-  Historic Parks and Gardens
(Policy NH/14)
-  Conservation Area
(Policy NH/14)
-  Proposed Northstowe Development
(Policies NS/3 & SS/5)

client
Lolworth Developments Ltd

project
**J25 Bar Hill,
Cambridge**

drawing title
**ENVIRONMENTAL DESIGNATIONS
AND POLICIES**

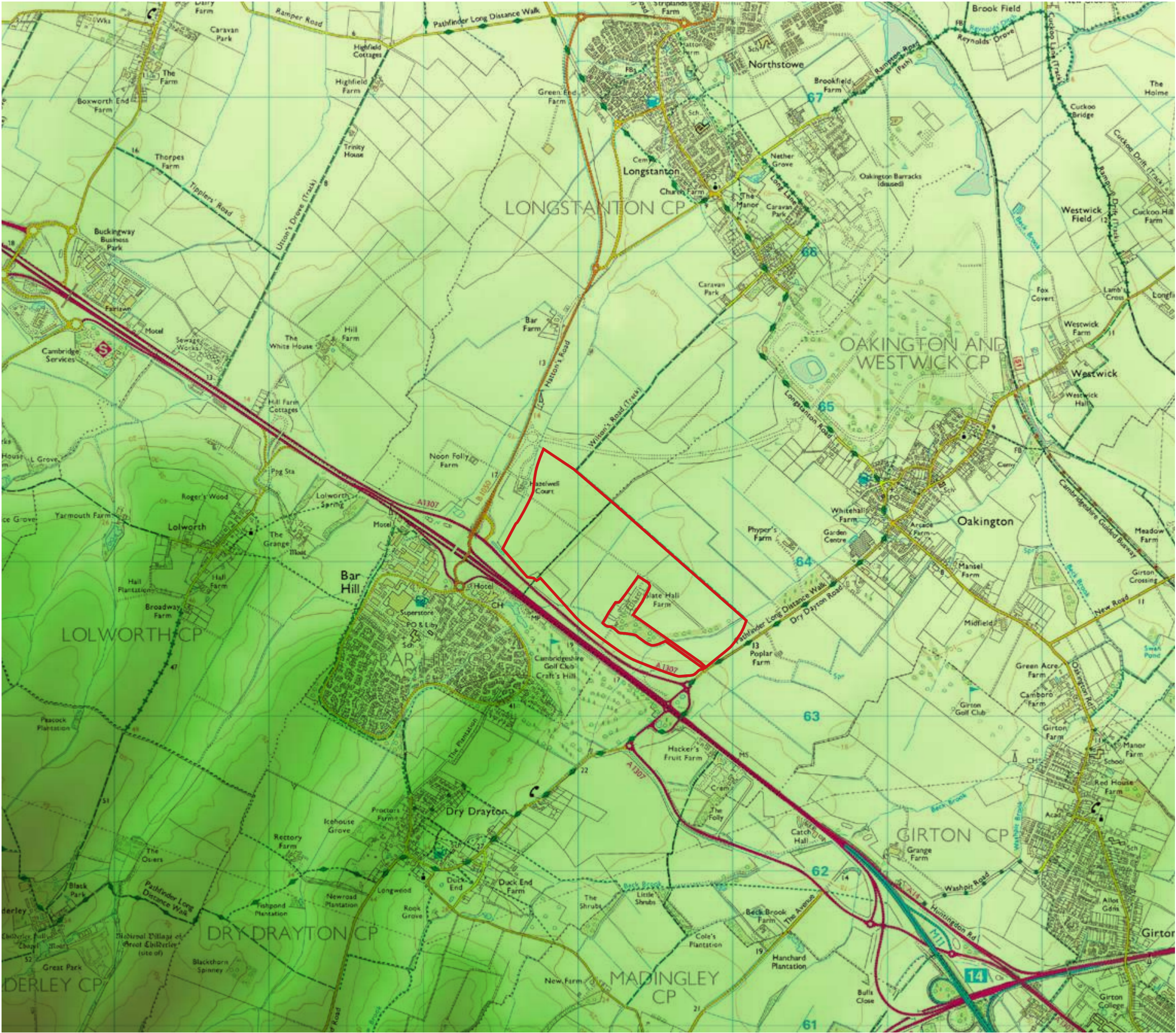
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rev

Figure 4



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project
J25 Bar Hill,
Cambridge

drawing title
TOPOGRAPHY

scale
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drawing / figure number

drawn
DB / TRJ

issue date
07 October 2021

rev
-

Figure 5

Ecology Summary

Project: Land at Slate Hall Farm, Bar Hill, Cambridgeshire

Client: Lolworth Developments Ltd

FPCR undertook an extended Phase 1 habitat survey, desktop survey and protected species surveys (wintering birds, ground tree assessment for bats, badger survey) in 2020 and 2021 to provide an initial ecological baseline for the site and to understand its ecological importance.

No statutory or non-statutory sites of nature conservation importance lie within 5km, 2km or 1km of the site, respectively. A number of protected/notable species records fall within the site boundary and within the wider 1km search area. Species records which fall inside the site boundary include badger *Meles meles*, otter *Lutra lutra*, water vole *Arvicola amphibius*, common lizard *Zootoca vivipara* and barbastelle bat *Barbastella barbastellus*, among others.

The site was dominated by habitats of limited ecological value, namely arable field compartments and associated species-poor grassland field margins. Habitats of greater ecological value comprised plantation woodland, mature tree lines and a stream (Habitat of Principal Importance (NERC Act 2006), each of which were dominated by native species. None of the on-site habitats are listed as a Priority Habitat by The Cambridgeshire and Peterborough Biodiversity Action Group.

The initial protected species surveys highlighted twenty-seven trees with features with the potential to support crevice roosting bats. Eight badger setts were recorded on-site, of which two setts were indicative of main sett status, with the remainder forming secondary setts. A total of 47 wintering bird species were recorded on-site, 19 of which are classified as protected or notable. During site visits, incidental evidence of water vole *Arvicola amphibius* and otter *Lutra lutra* was recorded along the on-site stream and review of aerial imagery identified several ponds located within 500m of the site, that may provide breeding habitat for great crested newt *Triturus cristatus*. The habitat assessments undertaken during the extended Phase 1 habitat survey found that the site provided some degree of suitable habitat for a range of protected/notable species including reptiles, foraging and transiting bats, great crested newts, nesting birds, terrestrial invertebrates, brown hare and hedgehog.

The proposals would achieve a circa 12% biodiversity gain on site (using DEFRA 3.0), retaining the majority of existing habitats of greater ecological value, with a significant area (30ha) of new habitats such as species-rich grassland, native scrub, native woodland, reedbed, SuDs and ponds, of which the latter will be specifically designed for water vole and otter. Further work is being completed to identify the best method to deliver an addition 8% increase to deliver a 20% net gain. This may take the form of additional habitat creation or funding the creation of habitats off-site in accordance with the strategic aims of the Greater Cambridge Green Infrastructure Network Strategic Initiative.

Further survey for the following is recommended to fully understand the ecological considerations associated with the proposals: bats (activity transect surveys, static detector surveys, nocturnal emergence survey and/or aerial inspections of trees with features suitable for roosting bats); GCN (aquatic pond surveys and/or entry to Natural England District Level Licensing Scheme); birds (breeding bird survey); reptiles; water vole and otter and terrestrial invertebrates.

Conclusion

In terms of ecology, whilst the assessment has confirmed that the development would not have a detrimental impact on any statutory or non-statutory designated sites and that the majority of on-site habitats proposed to be lost are of lower ecological value, the site has potential to support a number of protected/notable species and further assessment will be required to determine the extent of any impacts on these groups. The site assessment score should therefore be Amber.

LAND AT SLATE HALL FARM, BAR HILL CB23 8HB

Site Reference 40248

TECHNICAL APPRAISAL REPORT – Historic Environment

1. For the purposes of these Representations, the 'Historic Environment' issue has been taken to refer to the historic built environment (i.e. listed buildings, conservation areas, other non-designated historic buildings...) to distinguish it from archaeological aspects of the historic environment, which are addressed in the separate 'Archaeology' Technical Appraisal Report.

HELAA Site Assessment

2. The HELAA Site Assessment scores the Site as "Amber" with regard to the 'Historic Environment' issue.
3. This scoring is defined in the HELAA¹ as follows: *"Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated"*.
4. The Site Assessment does not include any site-specific details of heritage assets that are considered at risk of detrimental impacts through development within the proposal site, and the assessment simply repeats the HELAA definition of the Amber scoring.

Baseline Assessment of Proposal Site

5. Information on built heritage assets within the site and surrounding area is collated and reviewed in an archaeological and heritage Statement prepared for the site promoters by RPS in August 2021².
6. In this Statement Information regarding designated heritage assets was obtained from Historic England's *National Heritage List for England* (Scheduled Monuments, Listed Buildings, Registered Parks/Gardens, Registered Battlefields), and from South Cambridgeshire District Council (Conservation Areas); information on non-designated heritage assets was obtained from the Cambridgeshire Historic Environment Record.
7. The Statement confirms that the proposal site does not contain any designated built heritage assets.
8. There is only one designated built heritage asset within a 1km search area around the proposal site: "Milestone about 100 yards south east of turn to Bar Hill" – a 19th century cast iron triangular milestone, designated as a Grade II listed structure (NHLE Entry number 1127302). The recorded location of this milestone is a short distance southwest of the proposal site on the north side of the former A14 (a location now within the modern dual carriageway). Its current status is unconfirmed following recent road improvement and widening works on the A14.
9. The heritage significance of this Listed milestone relates to its historic interest as an example of a 19th century milestone and its close functional association with the earlier road from Cambridge to Godmanchester, the pre-cursor to the modern A14. Notwithstanding the current uncertainty over its condition following the recent A14 Improvement works, the significance of this asset does not rely on the proposal site, and the Statement determined that the asset is not sensitive to effects from future development within the proposal site.

¹ Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) – Annex 1: Site Assessment Methodology pp36-37

² Land at Bar Hill, Cambridge: Archaeological Statement. RPS ref JAC26932 August 2021

10. Within a wider buffer zone extending from 1km to 2km from the proposal site, the Statement identified thirty-three further Designated Assets: thirty-one Listed Buildings - generally located within the historic village cores of Lolworth, Dry Drayton, Oakington & Longstanton, and two Conservation Areas - in Oakington and Longstanton.
11. Whilst development within the proposal site may be distantly visible (more than 1.5km away) from the southeast part of Longstanton Conservation Area or from some of the Listed Buildings, this is not assessed as causing any harm to their heritage significance or to the contribution setting makes to this significance.
12. Any potential impact on the wider setting of these heritage assets can be mitigated by landscaping and design measures.

Conclusion

13. The Amber HELAA rating accepts that any impact on heritage assets can be reasonably mitigated, and the evidence provided confirms that mitigation of any impact in relation to development at the proposal site could be achieved.
14. Moreover, after taking into account the baseline assessment provided in the archaeological and heritage Statement, and the absence of harm to any heritage assets or their settings resulting from any development of the proposal site, it can be concluded that a 'Green' site assessment rating for the 'Historic Environment' issue would be appropriate.
15. In terms of the 'Historic Environment' issue, the summary outcome is that the site is available, achievable and suitable.

LAND AT SLATE HALL FARM, BAR HILL CB23 8HB

Site Reference 40248

TECHNICAL APPRAISAL REPORT - Archaeology

1. For the purposes of these Representations, the 'Archaeology' issue has been taken to refer to known archaeological assets within the site and surrounding area, and the site's potential for the presence of other, as-yet undiscovered, archaeological assets.
2. The historic built environment (i.e. listed buildings, conservation areas, other non-designated historic buildings...) is addressed in the separate 'Historic Environment' issue.

HELAA Site Assessment

3. The HELAA Site Assessment scores the Site as "Amber" with regard to the 'Archaeology' issue.
4. This scoring is defined in the HELAA¹ as follows: "*Development of the site could have a detrimental impact to archaeology. Further information regarding the extent and significance of archaeology would be required. Archaeological works could be secured by condition of planning permission*".
5. The Site Assessment explains the scoring further by reference to extensive settlement of Iron Age and Roman date known in the area.

Baseline Assessment of Proposal Site

6. Information on archaeological heritage assets within the site and the site's archaeological potential is collated and reviewed in the Statement prepared for the site promoters by RPS in August 2021².
7. There have been a considerable number and range of archaeological surveys and trial investigation works carried out within the site and the surrounding area; these included field survey in 1989 covering the entirety of the proposal site, and programmes of trial trenching and localised geophysical survey assessing parts of the proposal site and extensive surrounding land undertaken for adjacent large-scale development proposals. This range and extent of previous archaeological investigations provide a more robust evidence base than is frequently available to inform assessment.
8. The Statement identified a number of known non-designated heritage assets within the site: important Mesolithic and Roman period remains – located in the eastern third of the site (HER monument refs 07796, MCB20050; and MCB23141, MCB16858, MCB16859, MCB24991). The heritage significance of each of these relates principally to its archaeological interest and the potential of currently-surviving below-ground remains & finds to provide further information in the context of regionally and nationally defined research frameworks.
9. Through modelling of information for the site and surrounding area, the Statement concluded that the proposal site has a Moderate to High potential for the presence of further Mesolithic & Neolithic archaeological remains; a Low potential for major Bronze Age remains; a High potential for Iron Age and/or Roman rural remains; a Low potential for Saxon period archaeology; and a Low potential for Medieval and later evidence other than cultivation remains.
10. None of the identified assets would preclude allocation of the proposal site, or would prevent its future development.

¹ Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) – Annex 1: Site Assessment Methodology p37

² Land at Bar Hill, Cambridge: Archaeological Statement. RPS ref JAC26932 August 2021

11. It is however anticipated that additional archaeological trial works will be required to further assess the known archaeological assets and to clarify the potential for other areas of below-ground archaeological remains, and inform decision-making on any future planning application in order to ensure that development proposals are compatible with published policy at National level and the emerging Greater Cambridge Local Plan.
12. Subject to the trial works' results, appropriate mitigation of potential archaeological impacts can be achieved through a combination of a) design measures and b) programmes of post-consent archaeological investigation and recording undertaken prior to construction groundworks, and dissemination of the information obtained through the archaeological investigation programmes.

Conclusion

13. The Amber HELAA rating anticipates that further archaeological information will be required to evaluate the site's archaeology more fully and inform any planning application, but there is an expectation that the archaeological impacts will be capable of being successfully mitigated through further works under a condition attached to planning permission.
14. The evidence considered in the Statement and presented in these Representations supports this conclusion in relation to the proposal site, and confirms that an 'Amber' rating is appropriate.
15. In terms of Archaeology/ Historic Environment' issue, taking into account the mitigation measures available, the site assessment summary outcome is that the site is available, achievable and suitable.

Bar Hill, Junction 25

Local Plan evidence base HELAA review - Accessibility to Local Services and Facilities

184265/N10

1. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.
2. Sites have been assessed using a methodology that incorporated a 'Red, Amber, Green' (RAG) scoring system. The assessment largely seems to have been carried out using judgement although specialist consultees were used. As part of the suitability criteria, a number of elements associated with transport matters were considered.
3. The site is referenced as number 40248 in the HELAA document referred to as Land at Slate Hall Farm, Bar Hill.

HELAA transport assessment criteria

4. In this context the accessibility of the site was considered by non-car travel. A range of categories were considered which are generally more applicable to housing sites. It is considered that a different set of metrics would be appropriate for employment sites.
5. Categories such as proximity to health, primary and secondary schools are perhaps less applicable to an employment site than the consideration of proximity to public transport and cycle networks. Proximity to local, city or district centre were also considered along with proximity to major employment sites. The relevance of these services to employment sites is somewhat debatable.
6. It is considered that a different set of metrics would be appropriate for employment sites. It is difficult to see how under this assessment any employment site could achieve a green score. Even where a site does achieve this, the relevance of the score which may be due to proximity to schools at least in part is debatable.
7. It is considered that proximity to existing and emerging populations would be a useful consideration in this context, providing opportunity for travel to work by active modes of travel.

Site assessment

8. An Amber score was provided for this suitability assessment criteria.
9. Based on the assessment criteria used, an Amber score is considered to be correct. Generally, we would agree with the scoring against the distances to the services identified.
10. There are two areas where we disagree with the scoring; distance to the cycle network and public transport.

11. In terms of cycling, there is a cycle route running along the southern boundary of the site on the A1307, towards Northstowe and Bar Hill and through the site along the Bridleway. As such a **Green** score would be applicable with distances less than 800m. The HELAA scores this as Red at greater than 1,600m.
12. Public transport is scored as Amber suggesting distances of between 450m and 1,000m. However, it is understood that bus services travel along the A1307. Introducing a bus stop here would ensure the site falls within 450m of a bus stop and public transport, allowing a **Green** score to be provided.
13. It is recognised that addressing these points will not increase the overall score from Amber to Green. However, addressing these points will help confirm the overall accessibility of the site.
14. In addition, comments are made in this section relating to facilities. It is stated that the site has '*Adequate accessibility to key local services, transport, and employment opportunities*'. We would agree with these statements in the context of an employment site.
15. The additional comments are somewhat confusing. Again these seem to apply more to housing sites and confirms that a different assessment criteria for employment sites should be used.
16. It is stated that the '*Proposed development would require accompanying local centre / employment provision, primary school and community centre*'. Clearly, such facilities are not required for the intended employment use.

Summary

17. The assessment criteria is not necessarily suited to employment sites. The relevance of achieving a **Green** score by virtue of being close to schools is clearly debatable.
18. The site should be scored higher in the context of proximity to cycle and public transport networks. The assessment is incorrect in this regard.
19. With proper consideration of criteria that are relevant to employment sites, such as proximity to cycle and public transport routes and location in the context of existing and new communities (Northstowe in this context), the site would achieve a higher score.

Bar Hill, Junction 25

Local Plan evidence base HELAA review – Site Access

184265/N11

1. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.
2. Sites have been assessed using a methodology that incorporated a 'Red, Amber, Green' (RAG) scoring system. The assessment largely seems to have been carried out using judgement although specialist consultees were used.
3. The site is referenced as number 40248 in the HELAA document referred to as Land at Slate Hall Farm, Bar Hill.

HELAA transport assessment criteria

4. Cambridgeshire County Council (CCC) were consulted to inform this assessment. The potential to provide a suitable and safe access for both construction and occupation phases of a development were assessed.
5. A Green score means access is possible, Amber that there are constraints that can be overcome and Red that there is no possibility of providing access.
6. It is assumed a judgement on this basis was made by individuals within CCC.

Site Assessment

7. The site was provided an Amber score meaning there are potential access constraints, but these could be overcome through the development of the scheme.
8. It is not clear what constraints may have been identified or what, for this or any site, would enable a Green score.
9. It is assumed that full agreement of the access proposals from the highway authority would be required to enable a Green score to be provided. This would mean a preliminary design to be agreed and passed through a Stage 1 Road Safety Audit. It would also require a Transport Assessment to ensure capacity is suitable.
10. Without the full agreement, the only way a Green score might be achieved is where a site is existing, will not be intensified in terms of its use and access is suitable. Clearly for site promoted through the Local Plan this is entirely unlikely.
11. The further commentary for the site states that '*The proposed site is acceptable in principle subject to detailed design*'. We agree with this statement.

12. The further comment that '*The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site*' is confusing.
13. We consider this statement is not relevant and should be removed. National Highways will not be concerned with the access arrangement in detail as it will be a local highway authority matter.
14. We also note that adjacent sites such as Land to the south of the A14 Services, Boxworth does not have such statements attributed to its assessment despite relying almost entirely of vehicle movements taking place via the Strategic Road Network.

Summary

15. We agree with the assertion that access is suitable in principle and that some refinement of the proposals will be required through the detailed design process.
16. Without a clear understanding of how sites might achieve a Green score, we consider the Amber score to be appropriate.
17. Wider comments associated with National Highways and the Strategic Road Network should be removed where they are not relevant to the nature of the immediate site access.

Bar Hill, Junction 25

Local Plan evidence base HELAA review – Site Access

184265/N11

1. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.
2. Sites have been assessed using a methodology that incorporated a 'Red, Amber, Green' (RAG) scoring system. The assessment largely seems to have been carried out using judgement although specialist consultees were used. As part of the suitability criteria, a number of elements associated with transport matters were considered.
3. The site is referenced as number 40248 in the HELAA document referred to as Land at Slate Hall Farm, Bar Hill.

HELAA transport assessment criteria

4. The document suggests that CCC undertook transport assessments of each site, considering the potential impact of each on the local transport network, trunk routes, and local roads. Internal workshops were run to review and moderate the individual site assessments.
5. Key considerations such as current and future potential for site accessibility / connectivity the current and future level of sustainable transport provision and highway safety were all considered.
6. The Transport Assessments for each site are not provided. It is also unclear how some of the assessment criteria may have been applied. For example, a site may have scored Red if located in an area with ongoing transport improvements. However, it might be considered that the opposite of such a location is true in that a site near improvements can benefit from those improved links through improved accessibility.
7. Equally, a large, committed development might provide benefits if mutually beneficial i.e. a site promoting employment near to a committed development of housing will be beneficial in terms of locating new jobs close to new homes. However, this appears to be considered as a negative and reason to attract a Red score.
8. A Red score would result in an unacceptable impact. An Amber score is where any impacts can be reasonably mitigated. A green score can only be provided if there is no determinantal impact, presumably without mitigation. The criteria is therefore such that only sites that are already accessible or located on parts of the network with capacity or sites that are small in scale so as to not give rise to significant trips, may attract a Green score.

Site assessment

9. The site was provided a Red score meaning that the conclusion for this criteria was that the *'Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'*.
10. There is little detail provided to determine how the conclusion was reached. The comments provided state that the site is *'Remote from any adjacent settlement, sustainability issues (currently proposed for B2/B8) which is possibly more acceptable'*.
11. The above statement is clearly incorrect. The existing Bar Hill settlement is within 1km of the site (measured from centre to centre, note the closest borders are within 350 metres) and the emerging community at Northstowe with 10,000 homes will be largely within 1 to 2km of the site. Given such distances, we completely disagree with the statement that the site is remote from settlement, rather it is accessible to existing and future communities.
12. The comments also state that a Transport Assessment and Travel Plan is required which if the reference relates to a future planning application is agreed but also applicable to all promotion sites.
13. With reference to the Red score criteria identified in the assessment, **Table 1** provides some commentary against each.

Table 1: Assessment Red score criteria

Assessment criteria	Comments	Reason to attract a Red score?
<i>there were any large committed developments close to the site</i>	The commentary in this section of the HELAA states that the site is considered remote. Therefore, this could not have attracted a Red score. In addition, we would question whether a prospective employment site being located next to a large committed residential development (i.e. Northstowe), is a negative outcome.	No. Conclusion in the HELAA is clear and regardless, proximity to large, committed developments should not be considered a negative.
<i>the site was located in a congested corridor</i>	The SRN conclusion is Amber suggesting capacity is available. This criteria could not have attracted a Red score. The surrounding highway network has also been recently upgraded.	No. Assessments elsewhere suggest this is not the case and the network is recently improved.

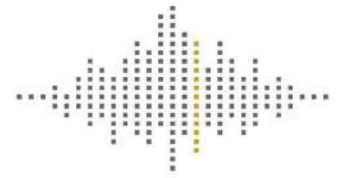
Assessment criteria	Comments	Reason to attract a Red score?
<i>the site was located near a problem junction</i>	The SRN conclusion is Amber suggesting capacity is available. This criteria could not have attracted a Red score. The surrounding highway network has also been recently upgraded.	No. Assessments elsewhere suggest this is not the case and the network is recently improved.
<i>the site was not sustainable</i>	In terms of transport the key criteria is the relative accessibility of the site by a range of modes. The HELAA scores accessibility as Amber.	No. Accessibility score in the wider HELAA is Amber.
<i>the site needed major transport infrastructure to be delivered</i>	No evidence to suggest this is the case. Cycle routes, public transport links in place and the highway infrastructure recently improved.	No. Recent infrastructure makes the site accessible.
<i>the site was located in an area with ongoing transport improvements</i>	It is not clear how, if a site is located near a scheme improving access this can be a negative outcome.	No. Criteria seems inappropriate.
<i>the site was located by a major accident cluster</i>	There is no evidence of this and the network is recently approved and as such undergone safety reviews and built to contemporary design standards.	No. There is no evidence to support this.
<i>the site was located by a major TIP Scheme- indicate contributions may be required.</i>	The Transport Investment Plan identifies a range of schemes across the region. The majority of sites would fall near to a scheme. It is unclear why, a potential improvement scheme which would be supported through development funding is seen as a negative.	No. Criteria is inappropriate given a recognised scheme could be delivered to benefit development and existing movements.

14. Whilst the wider Transport Assessment conclusions are not understood, there seems to be no criteria under the identified Red score considerations where the site would attract a Red score.

15. Given the identified capacity on the local road network which has been recently improved and the accessibility of the site, both of which the HELAA assesses positively elsewhere, it cannot be reasonably concluded that the site *'would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'*.
16. Further evidence of this can be drawn by making a comparison against the scoring for the site at Land to the south of the A14 Services, Boxworth. Unlike Bar Hill, Junction 25, the site is scored as Amber and 'No comment' is set out in the wider commentary. The reason for the distinction between the two sites is entirely unclear.
17. For Bar Hill, Junction 25, reference was made to the remoteness of the site and sustainability issues. Quite simply, this should apply to the Swavesey site as it is especially remote from any existing or planned settlement and sustainable transport links are incredibly limited. How this same comment is not attributed to a site that is distant from settlement cannot be rationalised.
18. It seems clear that there are inconsistencies over how individual sites have been scored to the detriment of Junction 25, Bar Hill.

Summary

19. The HELAA references a Transport Assessment for the site which has not been made visible as part of the evidence base.
20. The assessment criteria identify how sites might be scored Red. For many of these criteria the HELAA concludes elsewhere that the site is suitable. Other criteria there is no evidence to suggest a negative outcome.
21. With reference to another employment site, clear inconsistencies of scoring are apparent.
22. The proximity of the site to emerging communities such as Northstowe, which is a positive in a sustainable transport sense, combined with the conclusions elsewhere that capacity on the newly improved local highway network is available, suggests that the site should receive at least an **Amber** score. There are no identifiable reasons for scoring the site Red.



Technical Appraisal Report

Re: Land at Slate Hall Farm, Bar Hill, Cambridge – Noise and Vibration

Introduction

This noise screening report has been prepared in response to the site suitability section of the Greater Cambridgeshire (GC) HELAA. Noise and Vibration is considered in combination with odour and light pollution and has been assessed as Amber. It is advised that *'The site is capable of being developed to provide health internal and external environments in regard to noise/vibration/odour/light pollution are careful site layout, design and mitigation.'* The purpose of this note is to provide details of the mitigation measures that will be included to control noise and vibration.

Key Issues and Impacts

The site is located away from any built-up areas and the nearest noise sensitive receptors (NSR) are individual residential properties located on Dry Drayton Road to the south east and on the B1050 to the north west of the site. The location of the NSR are shown in Figure 1 below. The nearest built up areas to the site is the village of Oakington to the north east and Bar Hill to the south.

FIGURE 1: Location of Noise Sensitive Receptors



- NSR1 – Orchard Cottage
- NSR 2 – Hazelwell Cottages
- NSR 3 – Poplar Villas
- NSR 4 – Oakington
- NSR 5 – Bar Hill

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Company Consultant TL Redmore BEng, MSc, PhD, MIOA

Baseline Conditions

To determine baseline conditions a noise survey has been carried out to determine existing ambient (L_{AeqT}) and background ($L_{A90,T}$) against which the development will be assessed. Measurements were carried out at multiple locations on and around the site at locations representative of the nearest noise sensitive receptors (NSR) to the site.

TABLE 1: Survey Results

Location	Day time (0700 – 2300 hrs)		Night time (2300 – 0700 hrs)	
	L_{AeqT}	$L_{A90,T}$	L_{AeqT}	L_{A90T}
NSR1	66 – 68 dB	53 – 58 dB	56 dB	41 dB
NSR2	50 – 56 dB	48 – 55 dB	46 – 55 dB	42 – 54 dB
NSR3	57 – 71 dB	49 – 58 dB	47 – 66 dB	44 – 56 dB
NSR4	46 – 47 dB	41 – 46 dB	41 – 42 dB	39 – 40 dB
NSR5	54 – 69 dB	50 – 58 dB	51 – 60 dB	44 – 57 dB

Existing baseline noise levels, which is dominated during the day by road traffic noise on the A14 and localised roads and during the night by A14. The proposed employment use will result in an increase in vehicle movements on and around the site, however this will not be out of character with the existing noise climate. Therefore, subject to the mitigation measures discussed below the site is considered suitable for employment use.

Full details of the survey are included in Appendix A to the note, and summarised in Table 1 below.

Assessment Methodology

Noise from construction and operational activity will be assessed having regard to relevant noise guidance including BS 5288: 2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites, and BS 4142:2014+A1:2019 – Methods for rating and assessing industrial and commercial sound, and existing noise levels.

During the construction phase there is a potential for noise to cause short-term impacts when work is taking place in close proximity to the noise sensitive receptors identified. An assessment of the impact of construction activity will be carried out determine the level of impacts and mitigation measures required.

Operational noise will include the impact of noise from servicing activity, mechanical services plant serving the development and noise break-out from the units. It is not considered that vibration during the operational phase will be an issue. Operational noise will be assessed using SoundPLAN computer modelling software which predicts the noise level, L_{Aeq} and L_{Amax} from operational activity.

Mitigation Measures

As part of the design process operational noise will be taken into account to reduce noise at source. The principles of noise control would be embedded in the design of the layout of the site and the buildings, which would minimise the need for operational mitigation measures. Details of the mitigation measures which would be included are shown in the Table below:

Possible Mitigation Measures

Activity	Mitigation Measures
Noise and Vibration from Construction Phase	All work will be carried out in accordance with a construction environmental management plan (CEMP) which will include measures on how to control noise and vibration.
Operational Noise	
Fixed Mechanical Services Plant	Selection of quieter plant; Plant sited maximum distance from receptors; Use of noise attenuation measures such as silencers, acoustic enclosures and localised screening
Delivery Activity	Layout design to use buildings to screen service yard areas; Acoustic screens around service yard areas; Use of delivery management plans to control how deliveries received; Restrictions of delivery times
Break-out from Units	Design of units to minimise doors facing residential receptors; Construction of walls and roof of units; Restrictions on operating hours

The above measures are not exhaustive but show that operational noise can be mitigated through the design of the site. It is considered that following a detailed assessment and identification of mitigation measures, that all impacts can be resolved to prevent impact in line with the policy aims of the National Planning Policy Framework (NPPF), local policy aims and relevant guidance. In terms of noise, taking into account the mitigation measures, the site assessment summary outcome is that the site is available, achievable and suitable should therefore be assessed as Green

Gary King MIOA MCIEH

Director

gary.king@sharpsredmore.co.uk

8 December 2021

Appendix A: Noise Survey Results

Appendix A: Survey Details

Survey Locations



NSR1 – Orchard Cottage

NSR 2 – Hazelwell Cottages

NSR 3 – Poplar Villas

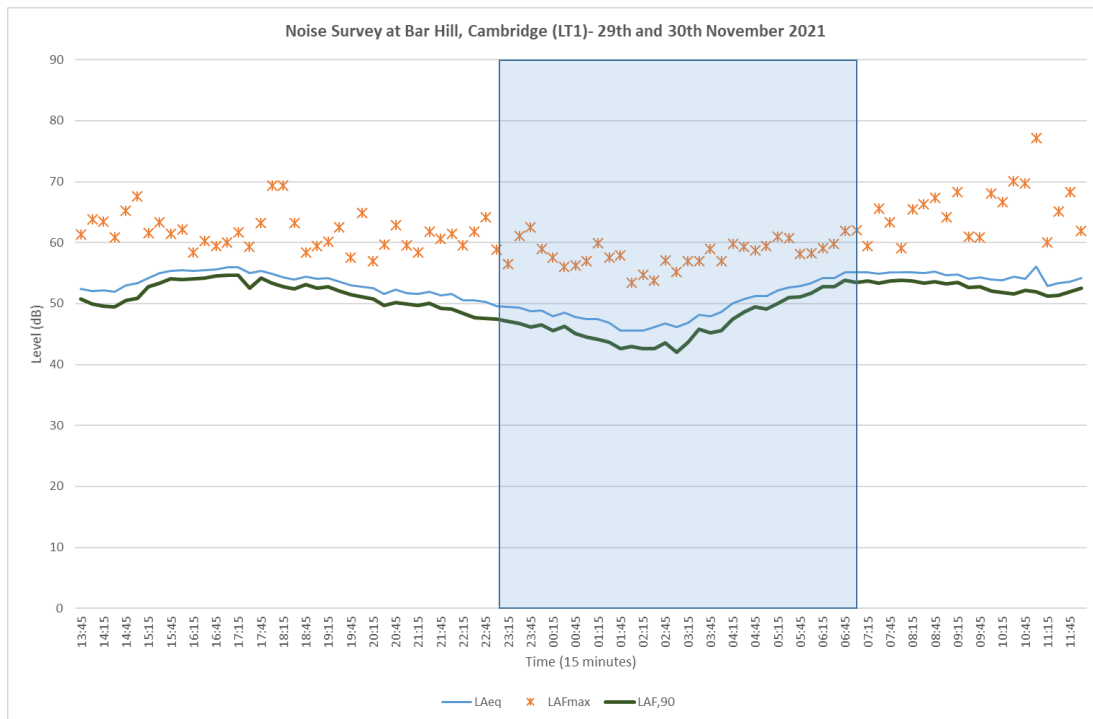
NSR 4 – Oakington

NSR 5 – Bar Hill

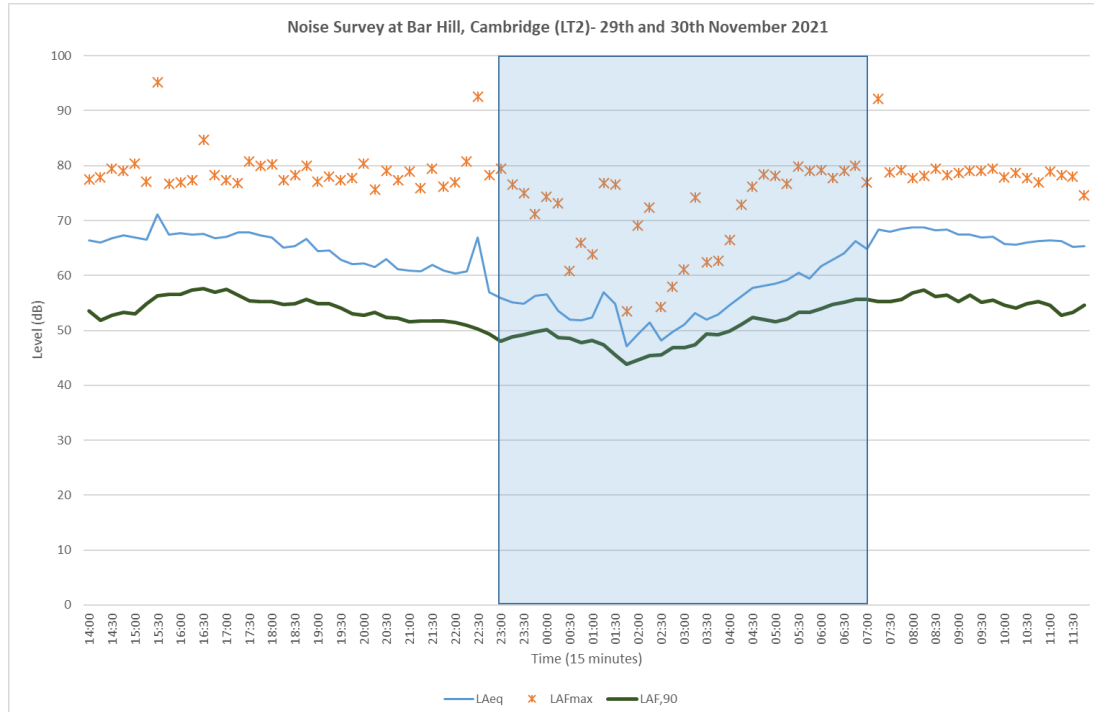
Survey Details

	OS Reference	Description
LT1	TL 38698 64404	Survey carried out over 24-hours with microphone set up on tri-pod 1.3m above ground level (GL) in free-fields conditions. Measurements carried out for approximately 24 hours
LT2	TL 40178 63535	Survey carried out over 24-hours with microphone set up on tri-pod 1.3m above ground level (GL) in free-fields conditions. Measurements carried out for approximately 24 hours
ST1	TL 38996 65564	Short-term attended measurements carried out during day and night period. Measurements carried out in free-field conditions
ST2	TL 40834 64421	Short-term attended measurements carried out during day and night period. Measurements carried out in free-field conditions
ST3	TL 38472 63754	Short-term attended measurements carried out during day and night period. Measurements carried out in free-field conditions
Weather Conditions		Predominantly dry, with light westerly winds. Short period of drizzle early morning but not considered to have affected noise levels
Equipment Used		Survey carried out using Norsonic type 1 sound level meters, with unattended measurements (LT1, LT2) fitted with environmental monitoring kit. All sound level meters were calibrated before and after the survey with no drift in accuracy noted.

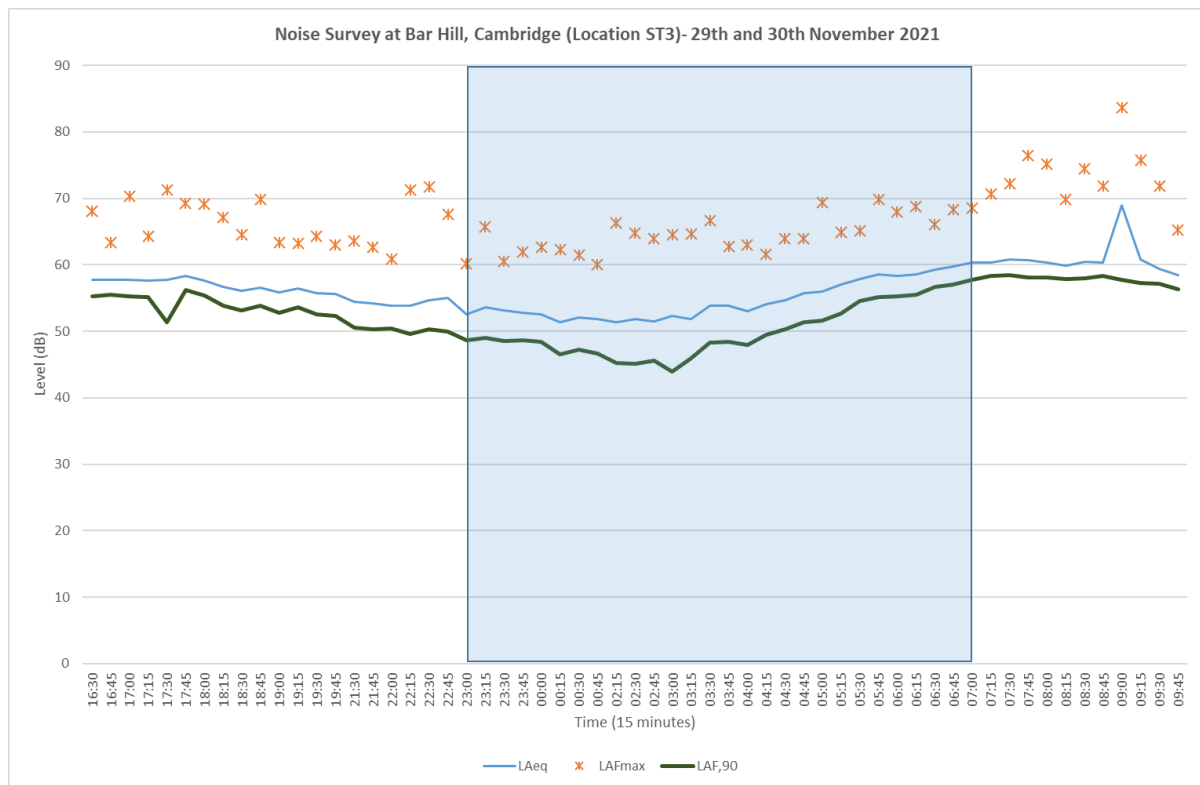
Survey Results – 29 November to 30 November 2021 (LT1)



Results – 29 November to 30 November 2021 (LT2)



Results – 29 November to 30 November 2021 – ST3



Survey Results – Measurement Locations - ST1-ST2

	Date	Time Period	Noise Level dB		
			L _{AeqT}	L _{Afmax}	L _{A90,T}
ST1	29.11.21	15:00 – 15:30 hrs	66	76	60
		20:13 – 20:40 hrs	66	76	53
	30.11.21	01:10 – 01:30 hrs	56	74	41
		10:15 – 10:40 hrs	68	81	58
ST2	29.11.21	14:25 – 14:50 hrs	46	62	42
		20:45 – 21:15 hrs	46	56	45
	30.11.21	01:40 – 02:10 hrs	41	56	40
		10:50 – 10:15 hrs	48	60	46

TECHNICAL APPRAISAL REPORT - BAR HILL, CAMBRIDGE

Introduction

A Technical Appraisal Report has been prepared in support of the Site Assessment Update. This includes an appraisal of baseline conditions at the site, consideration to potential air quality impacts as a result of the proposed development and how these will be assessed, as well as the guidance that will be utilised to determine appropriate mitigation for the scheme.

Baseline Conditions

As required by the Environment Act (1995), South Cambridgeshire District Council (SCBC) has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean nitrogen dioxide (NO₂) concentrations and 24-hour mean particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀) concentrations are above the Air Quality Objectives (AQOs) within the district. As such, one Air Quality Management Area (AQMA) has been declared, which is described as follows:

"An area along the A14 between Bar Hill and Milton. Note, although PM₁₀ is also a relevant pollutant within this AQMA and was included in 2008, the modelled PM₁₀ boundary is smaller and inside the NO₂ boundary, so the NO₂ boundary is the adopted one."

The site is partly located within the AQMA. As such, there is the potential for traffic generated by the development to increase pollution levels within the designation. This will therefore be considered as part of the Air Quality Assessment for the scheme.

It is noted that monitoring data provided in SCDC's 2021 Annual Status Report (ASR)¹ indicates pollutant concentrations within the AQMA have been below relevant AQOs since 2014. As such, SCDC intend to revoke the AQMA in the near future.

Background Pollutant Concentrations

Predictions of NO₂ and PM₁₀ concentrations on a 1km by 1km grid basis have been produced by Department for Environment, Food and Rural Affairs (DEFRA). These maps cover the entire of the UK to assist Local Authorities (LAs) in their Review and Assessment of air quality. The proposed

¹ SCDC's 2021 ASR, 2021.

development is partially located in two grid squares. Data for these locations was downloaded from the DEFRA website² and are summarised in Table 1.

Table 1 Background Pollutant Concentrations

National Grid Reference (NGR)	Background 2021 Concentration (µg/m ³)	
	NO ₂	PM ₁₀
538500, 264500	9.68	17.08
539500, 263500	11.37	18.33

As shown in Table 1, background NO₂ and PM₁₀ concentrations are well below the AQOs of 40µg/m³ at the proposed development site.

Key Issues and Requirement for Assessment

The proposals have the potential to cause air quality effects as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. These issues will be assessed in accordance with the following assessment methodology.

Assessment Methodology

Baseline air quality conditions in the vicinity of the site will be defined based on recent monitoring results and information from the DEFRA Air Quality Resource. Sensitive locations that could be affected by the proposals will also be identified, as well as any relevant planning policies or guidance.

During the construction of the proposed development there is the potential for air quality effects as a result of fugitive dust emissions from earthworks, construction and trackout activities. It is proposed to assess these in accordance with the Institute of Air Quality Management (IAQM) guidance 'Assessment of Dust from Demolition and Construction V1.1'³.

During the operation of the development there is the potential for air quality effects as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site. It is proposed to assess these through detailed dispersion modelling using ADMS-Roads in order to

² <http://uk-air.defra.gov.uk/data/iaqm-background-maps?year=2017>.

³ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2016.

fully quantify NO₂ and PM₁₀ concentrations at sensitive locations both with and without the development in place.

The assessment will be undertaken using relevant traffic data, local land use characteristics and 1-year of hourly meteorological records taken from the Cambridge observation station. The modelling outputs will be verified against local monitoring data in accordance with the DEFRA methodology. Impacts will be predicted at sensitive receptor locations and also displayed graphically throughout the assessment extents using contour plots.

The significance of potential effects at sensitive receptors will be determined based on the predicted magnitude of change in pollutant concentrations as a result of development related road vehicle exhaust emissions and the criteria provided within the IAQM document 'Land-Use Planning & Development Control: Planning for Air Quality'⁴.

Mitigation

If required following assessment of potential impacts, suitable mitigation measures will be identified in order to reduce air quality impacts to an appropriate level with reference to the recommendations included within documents 'Land-Use Planning & Development Control: Planning for Air Quality'⁵ produced by the IAQM and 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document'⁶ produced by the Greater Cambridge Shared Planning Service. These may include:

- Provision of electric vehicle charging points;
- Provision of low-emission energy infrastructure;
- Implementation of a Construction Dust Management Plan; and,
- Implementation of a Travel Plan.

The above is not exhaustive and any additional mitigation measures required to reduce air quality impacts to an appropriate level will be incorporated into the development proposals, where necessary.

⁴ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

⁵ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

⁶ Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, Greater Cambridge Shared Planning Service, 2020.

Conclusion

The Technical Appraisal Report confirms air quality impacts associated with the proposed development will be assessed and appropriately mitigated. As such, the scheme should be categorised as green in Greater Cambridgeshire's Housing and Economic Land Availability Assessment.

Technical Appraisal Report produced by Pearl Hutchinson, Principal Air Quality Consultant, Redmore Environmental, on 16th November 2021.

Date: 01/11/2021

Ref: 7437/CRS

Proposed Development at Slate Hall Farm, Barhill, Cambridge

Contamination and Ground Stability

The assessment from Greater Cambridge assesses the site as **Amber** risk with regards to Contamination and Ground Stability.

The site plan included in the assessment includes Slate Hall Farm in the centre of the site but it should be noted that the proposed development site does not include Slate Hall Farm

The assessment also states that the site area is 107.48ha when in fact it is 100ha. Presumably the 107.48ha includes Slate Hall Farm

Various investigations of the site have already been carried out which conclusively show that the site should be assessed as **Green**, especially since the proposed development of the site is principally for logistics and industrial use which is a less sensitive use than others such as residential.

These investigations are;

1. A Preliminary Risk Assessment (PRA) report, or historic desk study, by DTS Raeburn dated February 2020 ref E13287, a copy of which is attached
 This report shows that the site has remained undeveloped throughout its history with the exception of localized tree planting and the construction of hardstanding access routes.
 Therefore there is no known previous development on the site which might have caused a contamination risk.
2. In February 2020 eight trial pits were excavated across the site by DTS Raeburn in which infiltration tests were carried out to investigate the potential use of soakaways for surface water drainage.
 The report on this investigation ref E12387-2 L1 is attached.
 The trial pits showed relatively consistent natural ground conditions across the site with typically 1.5-2.0m of loose-dense sandy clays and gravels overlying firm to stiff Kimmeridge Clay.
 No imported fill materials were encountered nor any signs of soil or groundwater contamination
3. In September/October 2020 three boreholes to 20m depth were sunk in the western part of the site to investigate the deeper ground conditions to inform the design of proposed large logistics or industrial units.
 The report on this investigation dated November 2020, ref E31287-3 is attached
 The ground conditions encountered were very similar to those in the previous trial pits in 2. above with again no imported fill material encountered nor any signs of soil or groundwater contamination.
4. In September 2021 ten boreholes to 5.0m depth were sunk across the site for the purposes of ground water monitoring over a period of at least 12 months
 The boreholes logs ref E13287-4 are attached.
 Again the soil and ground water conditions were very similar to the previous investigations with no indications of imported fill materials nor any signs of soil or ground water contamination.

Further extensive geo-environmental site investigations will be carried out in due course to suit the detailed development layout and building locations.

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Based on these investigations to date and the history of the site it is not expected that significantly different or environmentally adverse soil or ground water conditions will be encountered .

The investigations to date show that the ground conditions are suitable for the proposed development

Therefore it is our firm view that these investigations provide clear evidence that the site should be assessed as **Green** rather than **Amber** with regards to Contamination and Ground Stability

C R Short

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Director
MJM Consulting Engineers Ltd

Bar Hill, Junction 25

Local Plan evidence base HELAA review – Strategic Highways Impact

184265/N13

1. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.
2. Sites have been assessed using a methodology that incorporated a 'Red, Amber, Green' (RAG) scoring system. The assessment largely seems to have been carried out using judgement although specialist consultees were used. As part of the suitability criteria, a number of elements associated with transport matters were considered.
3. The site is referenced as number 40248 in the HELAA document referred to as Land at Slate Hall Farm, Bar Hill.

HELAA transport assessment criteria

4. National Highways (previously Highways England) were consulted to consider how impacts on the Strategic Road Network (SRN) might be assessed. Principally in the context of the site this relates to the A14.
5. This assessment was based upon the capacity of junctions but it is not clear what data or models were used.
6. Zones were identified to consider how sites are located proximate to the SRN. Bar Hill, Junction 25 is located in Zone 2, A14 West which was allocated an Amber score with limited capacity for Growth.

Site assessment

7. The site was provided an Amber score due to its location within Highways England Zone 2 - A14 West and meaning there is considered to be limited capacity for growth.
8. There is value in understanding how the capacity of junctions and each zone was determined.
9. The limited capacity for growth conclusion is perhaps surprising given the recent upgrades undertaken to this part of the SRN.
10. The conclusion is that, whilst perhaps limited, there is some capacity for growth in the area.
11. The suitability of any site will need to be determined through a Transport Assessment. In this regard the conclusion that there is (limited) capacity on the network ensures that such assessments will ultimately determine the suitability.

Summary

12. It is unclear what models or data was used in order to determine the relative capacity of the SRN across the area.
13. The Zone within which the site is located suggests some, albeit limited capacity for growth. Whilst the conclusion is somewhat surprising given the recent improvements to the A14 in this area and Junction 25, this allows a later assessment to confirm the suitability of the site and proposals and this therefore considered suitable.

Combs 70/89

FOR DIVISIONAL USE ONLY

AGRICULTURAL LAND CLASSIFICATION

SLATE HALL FARM, BAR HILL, CAMBRIDGESHIRE

1. BACKGROUND

- 1.1 The site, an area of 146.3 hectares, is the subject of an application for the development of a shopping centre complex near Bar Hill, Cambridgeshire. MAFF surveyed the site in January and February 1990 to assess the agricultural land quality.
- 1.2 On the published Agricultural Land Classification map sheet No 135 (provisional, scale 1:63360 (MAFF, 1971)), the area is shown as mainly grade 2 with smaller areas of grade 3 in the vicinity of New Close Farm and the south east corner of the site.

2. PHYSICAL FACTORS AFFECTING LAND QUALITY

Climate

- 2.1 Climate data for the site was obtained from the published agricultural climatic dataset. (Met Office, 1989). This indicates that for the site's median altitude of 15m AOD the annual average rainfall is 547mm (21.5"). This data also indicates that field capacity days are 89 and moisture deficits are 118mm for wheat and 113mm for potatoes. These climatic characteristics do not impose any climatic limitations on the ALC grading of the survey site.

Altitude and Relief

- 2.2 The land surveyed is gently undulating and ranges in altitude from 13m to 20m AOD. The altitude is at a maximum around the track at Grid Ref: TL388640 and falls gently towards the northwest and east/south east to 14m and 13m AOD respectively. Gradient and altitude do not constitute limitations to the ALC grade.

Geology and Soils

- 2.3 The published 1:50,000 scale drift edition geology map sheet 187 (Geological Survey of GB 1975) shows the survey area to comprise Lower Greensand deposits through the central part and smaller deposits of Kimmeridge Clay and Gault Clay to the northwest and southeast corners of the site respectively.
- 2.4 The Soil Survey of England and Wales have mapped the soils in the area on two occasions; firstly, in 1973 at a scale of 1:63360 and secondly, in 1983, at a reconnaissance scale of 1:250,000. These maps show the occurrence of the Wicken (*1), Denchworth (*2) and Evesham 3 (*3) Associations where the clayey geological deposits outcrop and the Cottenham (*4) and Bearsted 1 (*5) Associations where the Lower Greensand deposits occur. During the current survey a more detailed inspection of the soils was carried out.

Three main soil types occur over the site.

(*1) Wicken Association 1973 : Gleyed brown calcareous soil (Grey calcareous Jurassic or Cretaceous Clay with thin Head).

(*2) Denchworth Association 1973 : Gleyed brown calcareous soil (Grey calcareous and non calcareous Jurassic and Cretaceous Clays).

(*3) Evesham 3 Association 1983 : Slowly permeable calcareous clayey and fine loamy over clayey soils. Some slowly permeable seasonally waterlogged non-calcareous clayey soils. (Jurassic and Cretaceous Clay).

(*4) Cottenham Association 1973 : Brown Earth (may be gleyed) (Lower Greensand with drift).

(*5) Bearsted 1 Association 1983 : Well drained coarse loamy and sandy soils over sand or sandstone, in places ferruginous. Some slowly permeable coarse and fine loamy soils affected by ground water. (Cretaceous sand and sandstone).

- 2.4.1 In the vicinity of the depot, GR:TL 391642 and Slate Hall Farm slightly droughty deep fine loamy soils predominate. They typically comprise sandy clay loam or occasionally sandy loam topsoils over (sandy) clay, (sandy) heavy clay loam or occasionally sandy clay loam subsoils to depth. (50/120cm⁺) At depth the profiles may overlie the following:-
- 2.4.1a) East of Slate Hall Farm below depths of 70/80cm⁺ profiles often contain approximately 10-20% small and very small ironstone nodules which either extend to 120cm or occur in thin bands of varying thicknesses.
- 2.4.1b) In the vicinity of Slate Hall Farm and north of the depot subsoils typically merge into loamy medium sand at depths 85/100cm⁺.
- 2.4.1c) North of the track running between New Close Farm and Slate Hall Farm subsoils generally merge into gleyed calcareous clays 50/115cm⁺.
- 2.4.2 North east of the depot and in the northwest and southeast quarters of the site clayey soils predominate. These soils typically comprise heavy clay loam or clay (in the south east) topsoils over clay or occasionally heavy clay loam subsoils which often become calcareous at depth (50/60cm⁺). Towards the south east profiles are often calcareous in the upper horizons and topsoil clay content typically exceeds 50%.
- 2.4.3 Gravelly soils outcrop in a small area in the vicinity of New Close Farm. The soils typically comprise medium clay loam or occasionally heavy clay loam topsoils over slightly stony gleyed heavy clay loam subsoils which generally merge into gravelly material* at depths 50/90cm⁺. Subsoils often become moderately stony in thin bands directly above the gravelly material. North of New Close Farm Cottages profiles typically overlie gleyed clay, below the gravel, at depths 90/120cm⁺.

* Gravelly material: typically comprises 50% flints in a matrix of medium sand and clay loam pockets.

3. AGRICULTURAL LAND CLASSIFICATION

3.1 The definition of the Agricultural Land Classification grades are included in Appendix 1.

3.2 The table below shows the breakdown of ALC grades in hectares and % terms for the survey area.

AGRICULTURAL LAND CLASSIFICATION

Grade	ha	%
2	41.0	28
3a	76.3	52.2
3b	25.7	17.6
Urban	0.4	0.3
Agricultural Buildings	2.9	1.9
	-----	-----
TOTAL	146.3	100
	-----	-----

3.3 GRADE 2

Approximately a quarter of the survey area has been mapped as grade 2. This land is associated with the soils described in paragraph 2.4.1 and subparagraphs 2.4.1a), 2.4.1b) and 2.4.1c).

3.3.1 Where the soil variants described in subparagraphs 2.4.1a) and 2.4.1b) occur the profiles are freely draining (wetness class 1) and hold moderately good reserves of water. The ironstone fragments or coarse textures at depth together with the fine loamy profile textures impose a slight limitation on the water holding capacity of these soil profiles. As a result, the minor droughtiness limitation restricts this land to grade 2.

3.3.2 Where the soil variants described in sub paragraph 2.4.1c) occur the fine loamy upper horizons overlie slowly permeable clays at depths (50/115cm⁺ ie wetness class I or II). These profiles are slightly droughty because the fine loamy textures impose a slight limitation on

the available profile moisture reserves. Within this area topsoils are typically sandy clay loams. As a result slight droughtiness, and where profiles are wetness class II, slight wetness and workability, imperfections exclude this land from a higher grade.

3.4 SUBGRADE 3a

The majority of the survey area has been mapped as subgrade 3a.

3.4.1 Most of the land graded 3a occurs in association with the better drained variants of the soils described in paragraph 2.4.2 above. Soil profile pit observations indicated that the subsoils are slowly permeable at depth, typically 45/55cm⁺ (ie wetness class II). This land is consequently limited by moderate wetness and workability imperfections which derive from the reduced subsoil permeability at depth combined with the heavy, decalcified**, topsoil textures. These factors restrict the land to subgrade 3a (Good quality agricultural land).

3.4.2 The remainder of the land graded 3a occurs in association with the moderately droughty gravelly soil variants described in paragraph 2.4.3. (Profiles are typically slowly permeable at depth (ie wetness class II) and topsoils are fine loamy (eg medium clay loams).) The presence of flints, in varying densities, moderately reduces the waterholding capacity of these profiles. As a result the moderate droughtiness imperfection constitutes the chief limitation to the ALC grade.

3.5 SUBGRADE 3b

The remainder of the survey area (approximately 18%) has been mapped as subgrade 3b. These areas occur towards the northwest and southeast corners of the site.

3.5.1 Towards the southeast corner of the site and north of New Close Farm the land is associated with the soils described in paragraph 2.4.2. Topsoils comprise decalcified** heavy clays (45/50 %⁺ Clay)

** Decalcified - Towards the southeast profiles can be calcareous throughout, however topsoil clay contents exceed 50%.

which overlie subsoils of similar textures. Subsoils are slowly permeable directly below the topsoil and as a result the drainage status has been assessed as wetness class III. Thus the wetness and workability imperfections impose a significant limitation on the agricultural potential of this land. Hence the land is restricted to subgrade 3b (Moderate quality agricultural land).

- 3.5.2 North of New Close Farm Cottages the land graded 3b is associated with the heavier gravelly soils described in paragraph 2.4.3. Topsoils typically comprise non calcareous heavy clay loams over gleyed subsoils which overlie gravelly material at depth. Profile pit observations indicate that the subsoils are slowly permeable directly below the topsoil (ie wetness class III). As a result significant wetness and workability limitations exclude this land from a higher grade.

3.6 URBAN

The depot on the A604 road has been mapped as urban.

May 1990

Resource Planning Group
Cambridge RO

Appendix 1

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower more more variable than Grade 1.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations will affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. When more demanding crops and grown yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of crops, especially cereals or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In most climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

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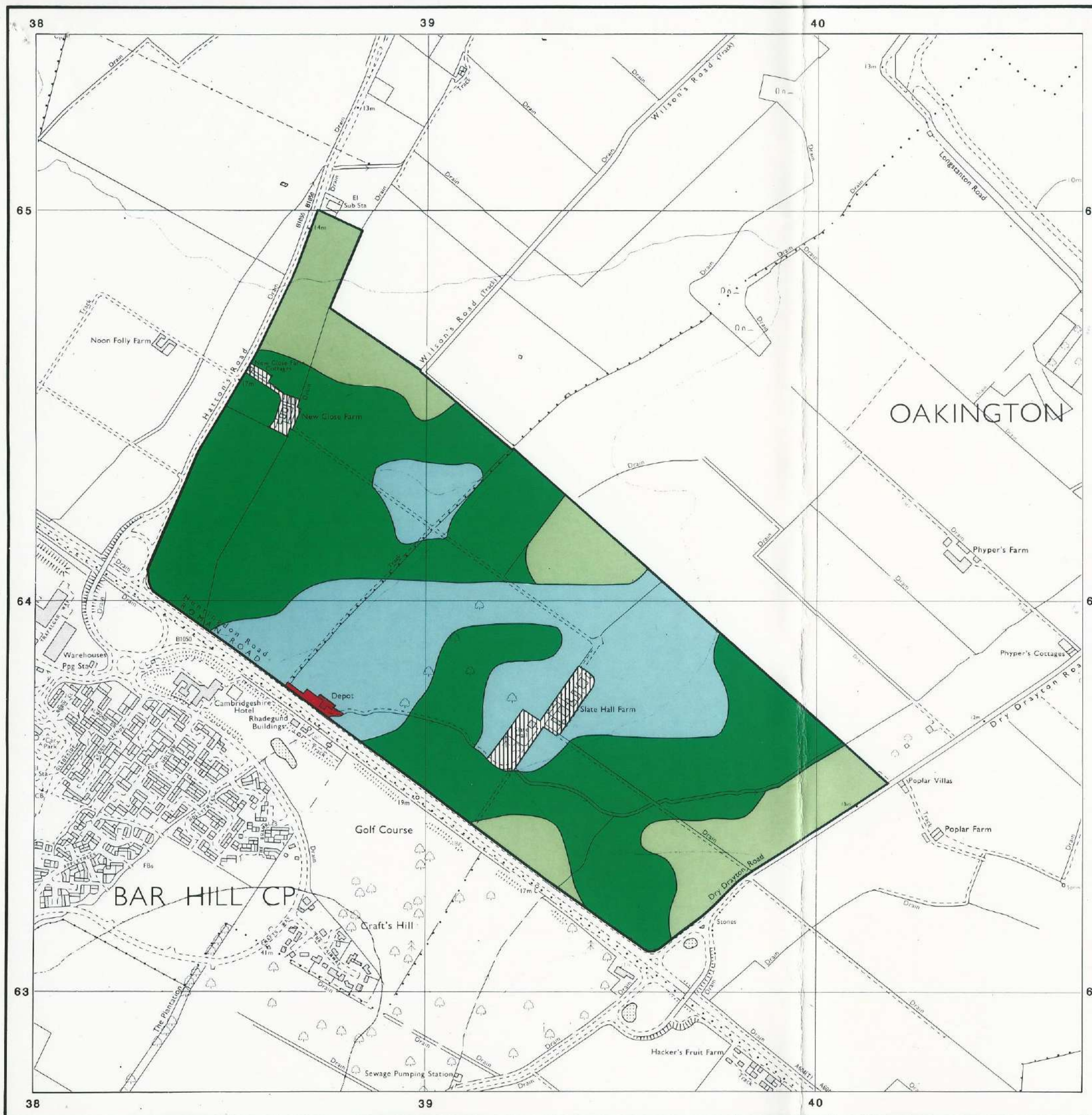
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Agricultural Land Classification

Slate Hall Farm, Bar Hill

AGRICULTURAL LAND

Agricultural Grades

Agricultural Land Quality

Grade 1 *

Very high

Grade 2 *

Grade 3 a *

b *

Grade 4 *

Grade 5 *



Very low

Disturbed *

Agricultural Buildings

Unsurveyed *

NON AGRICULTURAL LAND

Land predominantly in urban use

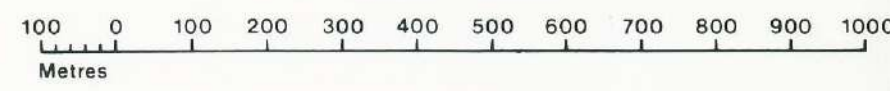
Other land primarily in non-agricultural use *

* Land in this category does not occur on this map

SOURCE MAPS Base maps taken from the O.S. 1:10000
Sheets TL 36 NE, SE, 46 NW, SW

This map is accurate only at the scale shown.
Any enlargement could be misleading

Scale 1:10000



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