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Our ref: [REDACTED]

Dear Mr Kelly and the GCSPS GCLP team

GCLP Development Strategy (Regulation 18 Preferred Options) Update, Reports to SCDC and CCC Committees – LDL Further Submission

On behalf of Lolworth Developments Limited ('LDL') we have reviewed the agenda and documents GCSPS Officers are presenting to the SCDC Scrutiny and Overview Committee on 12 January (and subsequent SCDC and CC Committee meetings), further to our 13 December 2021 GCLP PO Representations and our 7 October 2022 Further Representation Letter (LDL rep no. 59034).

LDL is promoting the J25 Bar Hill site for allocation for a leading-edge sustainable employment park development with business and logistics capability and capacity, in response to the employment need and demand across the area. The site benefits from excellent strategic accessibility, lies outside of the Green Belt and is well located relative to existing population and the emerging new residential neighbourhoods.

We consider that, in relation to industry and warehousing, the draft Development Strategy:

1. still significantly **under-estimates** the **actual requirements** for warehousing and distribution space across Greater Cambridge to 2041; and
2. fails to identify the **J25 Bar Hill site for allocation** as a suitable and viable site for a major employment park allocation to provide choice and meet much of those requirements.

Greater Cambridge Employment and Housing Evidence Update

We welcome the Greater Cambridge Employment and Housing Evidence Update, Employment Land, Economic Development and Relationship with Housing that presents a much higher (i.e. over 325%) scale of floorspace requirements for industrial and warehousing uses across Greater Cambridge to 2041. This clearly supports the points that we have raised in our previous representations that the evidence was underestimating significantly the industrial and warehousing needs across the area.

We nonetheless remain concerned that the actual scale of floorspace need for B8 Uses is still not estimated entirely as the evidence does not have regard to the requirements

for storage and distribution operations at a variety of scales, as required by NPPF Para 83. In particular, the fundamental, to consider demand for a larger-scale strategic distribution operators across the functional economic market area and the property market area, is missing. This issue, has been raised by the GCLP stakeholder engagement and is presented in the IcenI evidence (at Report paras 2.88-2.89), . Therefore, by definition the updated evidence contradicts the PPG's emphasis and clear guide on market signals and engagement with various logistics stakeholders.

Moreover, Lichfields has reservations about the selection criteria of the '*key sectors*' that have been further enhanced through the modelling, and, in particular, the dismissal of '*logistics*' as a key sector reflecting upon the market signals and stakeholder engagement that is presented within the study. This is even more acute considering that the IcenI report (para 4.9) states that the selection of the key sectors is based on inter alia discussions with stakeholders who have raised the increasing demand for logistics across the area. For the above reasons, Lichfields remains in the position that the evidence **still underestimates the actual requirements for warehousing and distribution space across Greater Cambridge**. Across our estimations (as presented in our Preferred Options representation) the B8 need for Greater Cambridge varies between 276,000 sq.m and 342,500 sq.m.

Emphasis also needs to be given to the **lack of supply of suitable and viable sites** to accommodate the identified (although low) logistics requirements for c 200,000 sq.m across the Plan period covering short, medium and longer term. In particular, the evidence highlights that there is a substantial shortfall of c 150,000 sq.m (the actual shortfall varies between 219,100 sq.m and 285,600 sq.m based on our estimations) that is proposed to be partially accommodated by A14 Services allocation (i.e. up to 73,000 sq.m) as well as some smaller sites with limitations.

The remaining shortfall of over 40,000 sq.m (and up to 174,600 sq.m based on our estimations) is supposed to be facilitated through the Cambridge East allocation. Such a supply (as a whole) is not suitable as it will not provide for a variety of scales and is not developable within timescales that cover the entire Plan period and primarily the short term over the next 5 years. Considering the above, the most **viable solution** is to add more allocations that could deliver suitable and appropriate industrial and warehousing space in short term such as J25 Bar Hill.

J25 Bar Hill Site and Location Suitability

The reports are, unfortunately, silent on the **GCSPS assessment** of the J25 Bar Hill site promotion, a development strategy consideration in our view, but simply seek to take forward the draft allocations in the GCLP PO 2020 without any apparent individual or comparative site assessment in the GCLP Consultation Statement (at Appendix C).

The merits of the J25 Bar Hill site and its location are endorsed by IcenI's own site criteria (para 5.56):

- 1 Strategic highways access:** Junction 25 of the recently upgraded A14 provides good site access at a nodal point on the strategic road network; to help meet local, regional and national employment needs.
- 2 Site size:** The site has the capacity to deliver around 60 ha of developable space, contributing to meeting the identified employment shortfall by providing a large allocation offering the capability and flexibility of a range of unit sizes to respond to the spatial needs of the mid and larger units, as

well as the mid-tech sector and final mile logistics opportunities, as well as the opportunity for extensive landscaping and biodiversity net gain.

- 3 **A14 economic cluster opportunity:** around comparable existing businesses including Bar Hill and Trafalgar Way, to exploit agglomeration benefits and complement the employment and business space offer along the A14 Corridor.
- 4 **Proximity to settlements:** the site is close to both and existing (Bar Hill), new (Northstowe) and proposed settlements, in particular Northstowe (6,345 new homes across the Plan period), providing easy accessibility to the growing labour pool, thereby contribute to minimising workforce travel distances and maximise accessibility by sustainable transport opportunities such as bus or more active modes of transport (unlike the proposed A14 Services site allocation).
- 5 **No major environmental constraints:** the site lies outside of the Green Belt, there are no major environmental or heritage constraints, and its development is capable of assimilation within the landscape with mitigation.

Next Steps

We will provide a fuller critique in due course but, for now, would recommend that the draft Development Strategy is not approved but a decision is made to amend it to address these matters.

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

Yours sincerely


Steven Butterworth
Senior Director

Cc Jonathan Dixon & Caroline Hunt - GCSPS
Members of the SCDC Scrutiny and Overview Committee