

# Greater Cambridge Local Plan – The First Proposals

## Form to assist in drafting responses to the consultation

This form is provided to help you develop your comments in response to the detailed policies in the First Proposals.

When you are ready to submit, please input your comments into our online consultation system – this ensures that the right comments are assigned to the right policy, and that we can track and respond to them appropriately. Please do not return this form to us by email or post, as our team will have to manually enter your responses into the online system and this has scope for error or misinterpretation of your comments.

If you have difficulty commenting online, please contact us at [localplan@greatercambridgeplanning.org](mailto:localplan@greatercambridgeplanning.org) or 01954 713694. We are holding a webinar on the comment process on 4 November 2021 which you may attend or watch back – visit [www.greatercambridgeplanning.org/localplan](http://www.greatercambridgeplanning.org/localplan) for joining details.

### What to comment on:

- If you support all or some of our proposals for a policy or section, please tell us – it is important to know what you support, and why.
- You do not need to comment on each section and policy – please only comment on aspects of the plan which you feel strongly about.
- Please keep your comments concise and specific. We receive thousands of comments and it helps us to identify the most important points you raise if they are clearly worded.
- Please do not include personally or commercially sensitive information in your comments. We will redact any such information, as well as any offensive material, prior to publishing comments.

- You can upload attachments, but please avoid uploading lengthy documents or general reports or articles. We cannot take into account any material which is not specific to Greater Cambridge or the Local Plan.

## Vision and development strategy

| Section / Policy | Your comments   |
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| Vision and aims  | <p>Marshall fully endorses and embraces the vision and aims of the 'First Proposals' consultation and is committed to embedding these aims at the heart of the vision for Cambridge East. Marshall has prepared separate detailed representations in response to the individual sections and policies that relate to the Development Strategy and to Cambridge East. The key points outlined in Marshall's representations and how these relate to the Local Plan's vision and aims are summarised below:</p> <ul style="list-style-type: none"> <li>- Marshall strongly supports the allocation of Cambridge East for a truly mixed-use development which will comprise a significant number of new jobs, homes, community services / facilities and infrastructure. Marshall is pleased that the importance of the Site to Greater Cambridge's growth strategy is recognised through this significant allocation.</li> <li>- Whilst the Greater Cambridge Local Plan has planned for more homes than required by the standard method, Marshall considers that the Development Strategy is currently understating</li> </ul> |

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|  | <p>growth and could go even further to maximise Greater Cambridge's economic potential.</p> <ul style="list-style-type: none"><li>- The safeguarded land at Cambridge East is one of the largest brownfield sites located outside of the Green Belt on the edge of Cambridge. It is one of the most sustainably located sites and represents the best opportunity to meet the GCSP's Local Plan aims through the creation of a new, but complementary quarter for Cambridge. The opportunity to optimise the capacity of Cambridge East and maximise the site's social, economic and environmental credentials should be thoroughly explored. Marshall considers that the scale of growth potential that could be achieved together with the quality of the Site justify optimising the allocation at Cambridge East and would justify the allocation of additional land east of Airport Way.</li><br/><li>- Cambridge East provides a significant opportunity to address inequalities that exist to the east of Cambridge. Cambridge is one of the most unequal cities in the UK and has some of the least affordable housing, with pockets of deprivation. Cambridge East has the scale to achieve transformational change in the east of the City that will significantly improve the lives of local residents through the provision of access to skills development, education and life-long learning, a range of job opportunities, affordable</li></ul> |
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|   | <p>homes and a range of cultural, leisure and retail options.</p> <ul style="list-style-type: none"> <li>- Cambridge East also provides an opportunity to address the current lack of cross-city connectivity through the provision of a transformational transport strategy.</li> <li>- Cambridge East is being planned to achieve an exemplar sustainable development which can act as a flagship for the Councils' objectives. By pioneering new technologies and considering the long term welfare of our planet and its people, Cambridge East can create a transformative green infrastructure connecting the City with the countryside that sets the new global standard for sustainability. The potential for the sustainability benefits of Cambridge East would be even greater if development also includes land east of Airport Way, enabling planning at a genuinely strategic scale.</li> <li>- In any event, however, Marshall is keen to work collaboratively with the GCSP and local communities to establish the best policy approach to the Site identified in the Preferred Options, ahead of the publication of the draft Local Plan in Autumn 2022.</li> </ul> |
| <p>How much development, and where – general comments</p> | <p>Marshall supports the GCSP's recognition of the need for growth in Cambridge and supports its aims to plan for enough housing to meet the needs of Greater Cambridge and plan for a flourishing and</p>   |

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|                          | <p>mixed economy that provides for a wide range of jobs. Marshall recognises that the GCSP's ambition and proposed approach to deliver more homes than are required by the standard method reflects the Government's objective to boost the supply of housing.</p> <p>The Greater Cambridge Local Plan provides an opportunity to significantly boost the supply of housing and employment floorspace to support the area's economic prosperity and growth ambitions. There is further potential to do this and truly maximise Greater Cambridge's economic potential than currently identified in the 'First Proposals' consultation document and Cambridge East represents the largest and most sustainable opportunity to realise this potential. Marshall are keen to work positively and proactively with the GCSP and wider stakeholders to develop policies for Cambridge East that best reflect the GCSP's Local Plan ambitions and objectives. Marshall also proposes to undertake public consultation on the scheme during the second quarter of 2022, to identify the important constraints and opportunities in consultation with local communities and other interested parties.</p> |
| S/JH: New jobs and homes | <p>Marshall recognises the level of growth that has been put forward by the GCSP and the proposed delivery of a number of homes that exceeds the standard methodology calculations. This submission is therefore made without prejudice to that position; however, Marshall does consider that</p>  |

there is opportunity through Policy S/JH to plan for even more ambitious growth.

Page 28 of the Preferred Options Local Plan consultation document explains that one of the alternatives that the GCSP considered was planning for the higher jobs forecast and level of homes associated with it. The report confirms that this alternative was rejected as it was considered that the higher jobs forecast was “*not the most likely future scenario*” (Page 28). Marshall supports and endorses much of the narrative in the draft Local Plan, which acknowledges the significance of the knowledge-intensive clusters and their importance to the reputation and resilience of the Cambridge economy, as well as recent trends of high economic growth. The scale of Cambridge East means that it is capable of delivering inclusive employment opportunities through the provision of a wide range of jobs for local people. Marshall are committed to delivering a scheme that can generate employment across a variety of sectors and cover a range of different levels, not just highly skilled jobs. Marshall encourages the GCSP to reflect on the alternatives put forward for this policy and reconsider the opportunity to aspire for greater employment growth that captures the true economic potential of Greater Cambridge. Marshall would be pleased to submit further evidence to the GCSP.

Cambridge East has been identified as one of the key sites that can contribute to the delivery of new

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|                                   | <p>employment floorspace, new homes and other community facilities / services that meets the needs of Greater Cambridge. Marshall is pleased that the significant contribution which its land can make to the future wellbeing of Cambridge has been recognised through its draft allocation. Marshall is committed to working positively and proactively with the Councils to ensure that Cambridge East comes forward to optimise its social, environmental and economic potential.</p>  |
| <p>S/DS: Development strategy</p> | <p>The options for the distribution of homes and employment were tested in the suite of evidence base documents that the GCSP published in November 2020 documents and through the latest Preferred Options documents.</p> <p>Marshall considers that, in order for the GCSP to plan at a scale necessary to generate investment for significant infrastructure and to meet the housing and employment needs of the area, the GCSP are right to adopt a strategy that combines different locations for focusing growth. Densification of existing urban areas is a logical place for development in sustainability terms; however, this option alone will be insufficient in terms of land capacity to accommodate the housing and employment needs for the area.</p> <p>Therefore, the GCSP has opted for a blended strategy which directs new development towards locations that generate the least climate impacts, in line with the aims and objectives of the Local Plan.</p> |

In locational terms, this objective to direct development to the locations that generate the least climate impacts means that the majority of the proposed growth is directed toward the Cambridge urban area, edge of Cambridge sites and new settlements. Marshall strongly supports the GCSP's blended approach and the selection of proposed sites based on their ability to contribute to climate change objectives.

Pages 41 and 42 of the 'First Proposals' document, in relation to Policy S/DS, identify that there is a need for new strategic water supply infrastructure in Greater Cambridge to provide for the longer term needs of the preferred growth trajectories. It is indicated that a suitable solution may not be forthcoming until the mid-2030s and that the Local Plan may look to limit development levels until such a time that the strategic infrastructure is operational and able to support full delivery rates.

An integrated approach is required from all the key stakeholders in order to have a positive effect on the potential impacts of growth on the water environment. In particular, the onus is on Water Resources East and the water companies, through their obligations in the Water Industries Act 1991, to plan for and provide water to meet the requirements. Developments, including Cambridge East, will also have an important role to play and will need to make a more meaningful contribution to a sustainable future through the implementation of



integrated water management regimes. The legal obligation and responsibility is on the water companies to address the expected water supply shortage and ensure that a suitable solution is identified to maintain the delivery rates required to meet housing and employment needs in Greater Cambridge. This matter should not influence the approach that the GCSP take to meeting the area's needs. Marshall are keen to work with the water companies and the local authorities to understand and explore this matter further.

Having regard for the transport strategy outlined a part of Policy S/DS (pages 43 – 46), Marshall are supportive of the committed infrastructure proposals that are being progressed by the transport bodies and the objective of seeking to achieve a modal shift away from the use of the private car. As set out in the NPPF, the supply of large numbers of new homes can often be best achieved through planning for large scale development, provided that this development is supported by the necessary infrastructure. In order to ensure there is a genuine switch from car use towards sustainable modes of transport, new development must be supported by convenient, regular and affordable public transport, as well as safe and accessible pedestrian / cycle links.

Cambridge East provides a significant opportunity to address the current lack of cross-city connectivity through the provision of a transformational transport

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|                             | <p>strategy linking the eastern side of the City with Cambridge Station, the city centre, Cambridge North Station and Addenbrooke's and other key locations to the south. The greater the scale of development at Cambridge East, the greater the footfall, capacity and opportunity to deliver a transformational transport system that is a step change in transport in Greater Cambridge.</p> <p>Cambridge East has the potential to unlock mobility solutions that will make living, working and travelling in Cambridge easy, affordable and better for the environment.</p> <p>Marshall and its consultant team are continuing to work closely with the GCSP, Cambridgeshire County Council, the Greater Cambridge Partnership and the Cambridgeshire &amp; Peterborough Combined Authority to test and develop the most suitable and sustainable transport solution to support Cambridge East and beyond, exploring schemes that can be funded through already existing funding streams (e.g. City Deal), as well as more ambitious proposals which could be delivered through funding that the scheme itself can help to leverage given the scale of housing and economic potential.</p> |
| S/SH: Settlement hierarchy  |  |
| S/SB: Settlement boundaries | <p>Marshall supports the need for defined settlement boundaries, which indicate the extent of existing and planned development and help to guard the countryside against incremental growth. In defining the settlement boundary on the eastern edge of Cambridge, consideration should be given to the</p>  |

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|  | <p>safeguarding land east of Airport Way, in order to accommodate for the relocated Park &amp; Ride and allow for any future expansion of Cambridge East. Given the sustainability of the site and the location, the expansion of Cambridge East would be the logical place to locate future growth, whether that is determined through this local plan or through subsequent plans.</p> |
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## Cambridge urban area

| <b>Policy</b>                           | <b>Your comments</b>   |
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| Cambridge urban area - general comments |  |
| S/NEC: North East Cambridge             | <p>Marshall recognises the approach that the GCSP are taking regarding the timescales for the Local Plan relative to the North East Cambridge allocation.</p> <p>Whilst the approach to the Local Plan and North East Cambridge AAP / DCO is acknowledged, there is a risk that the relocation waste water treatment plant proposals could be delayed, which in turn will influence the remaining stages of the Local Plan process, should the Local Plan continue to be contingent on Anglian Water's DCO. The GCSP should consider accelerating the Local Plan ahead of the DCO if this begins hold up the progress of the Local Plan.</p> <p>Marshall is continuing to work proactively with Anglian Water to consider opportunities to interlink</p> |

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|                                      | the new waste water treatment plant site with Cambridge East. This includes looking at opportunities to join-up connectivity through walking / cycling routes and opportunities to deliver green infrastructure and biodiversity net gain. |
| S/AMC: Areas of Major Change         |  |
| S/OA: Opportunity Areas in Cambridge |  |
| S/LAC: Land allocations in Cambridge |  |

## Edge of Cambridge

| Policy                               | Your comments  |
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| Edge of Cambridge - general comments | <p>In order for the GCSP to plan at a scale necessary to generate investment for significant infrastructure and to meet the housing and employment needs of the area, it is necessary to adopt a strategy that combines different locations for focusing growth. Realistically, a growth strategy that directs new development to the edge of Cambridge is the only option likely to generate the quantity of land in sustainable locations that are suitable for development. This reinforces the importance and value of Cambridge East and the capacity that it is able to deliver through the growth strategy.</p> <p>As identified through the CPIER (Page 42), Cambridge East is the only side of the city that is not constrained and could accommodate significant levels of housing and employment growth, whilst</p> |

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|                             | <p>still having the advantage of being close to the principal centres of employment and the existing transport infrastructure. There are no other sites with this scale of opportunity, that are released from the Green Belt and sustainably located so close to the city centre.</p>   |
| <p>S/CE: Cambridge East</p> | <p>The Preferred Options consultation document rightly recognises the importance of Cambridge East to the growth strategy of Greater Cambridge through the allocation of the site for a significant mixed-use development. Marshall strongly supports the principle that the Local Plan should allocate Cambridge East and optimise the potential of the land to meet housing, employment and cultural needs in the City. Cambridge East is a development opportunity of national potential and importance and its scale and location make it a unique opportunity to establish the next chapter in the remarkable story of the City of Cambridge and Greater Cambridge area. It is the largest brownfield site and is the most sustainable opportunity to deliver significant growth embedded within the Greater Cambridge area. Cambridge East represents one of the key sites in the development of the Local Plan strategy based on its scale and its inherent potential to add to and diversify the City. It presents the opportunity to plan for forms of development that cannot be accommodated within the historic core and it is capable of providing the key missing links in a comprehensive sustainable transport network for the City.</p> |

Marshall is committed to delivering a scheme that is truly sustainable and of exceptional design quality.

Through the work that has been undertaken and shared with GCSP so far, it is clear that a development of the scale of Cambridge East can have significant sustainability benefits in comparison to locating development over a series of smaller sites. The benefit of scale at Cambridge East can provide:

- A single integrated public transport and active travel solution to reduce carbon emissions and ensure local air quality improves;
- A single strategy to meet both biodiversity net gain and carbon sequestration, providing significant large-scale opportunities for major local environmental gains; and
- An opportunity to invest in sustainable approaches to water management, energy and biodiversity.

Marshall will continue to work collaboratively with the GCSP to undertake further capacity testing and prepare evidence base documents that demonstrate that the site is capable of developing into a high quality urban quarter, which can enhance the social and economic objectives of the Local Plan.

Marshall would like to take forward close joint working with the councils by entering into a PPA with the GCSP, which will facilitate further discussions around scheme design, mix of uses,

the supporting transport strategy and other technical evidence, ahead of the preparation of a draft policy in Autumn 2022.

In advance of the next version of the Local Plan being published, Marshall is committed to:

- Engaging and working with the local community to understand their views and how those views should influence the content and development of Cambridge East. As part of this, Marshall is currently developing a plan to launch public consultation during the second quarter of 2022 to understand the issues of importance to the adjoining communities and other key stakeholders;
- Developing a clear, shared vision for the development of the land;
- Identifying ways in which the development of Cambridge East can help deliver wider objectives for the City of Cambridge and Greater Cambridge area;
- Undertaking further capacity testing which maps out the scale of development that can be accommodated consistent with enhancing access to the countryside and green infrastructure, whilst protecting important views and environmental assets;
- Developing the technical evidence base to support the delivery of the development;
- Planning the phased delivery of infrastructure, including green infrastructure and social infrastructure;

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|  | <ul style="list-style-type: none"> <li>- Optimising sustainable transport measures and planning for a net zero development;</li> <li>- Developing a detailed draft policy for Cambridge East that can be embedded in the local plan; and</li> <li>- Creating the confidence which allows the GCSP to rely on the high quality and delivery of Cambridge East in favour of development proposed in less sustainable locations.</li> </ul> |
| S/NWC: North West Cambridge                                |  |
| S/CBC: Cambridge Biomedical Campus                         |  |
| S/WC: West Cambridge                                       |  |
| S/EOC: Other existing allocations on the edge of Cambridge |  |

## New settlements

| Policy                             | Your comments   |
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| New settlements - general comments | The importance of the main sustainability and climate change objectives in the 'First Proposals' is such that the spatial strategy of the Plan must optimise sustainable choices adjacent to Cambridge rather than dispersing growth and encouraging increased travel. By optimising development at Cambridge East, this allows the plan to avoid the need to plan development in less sustainable locations. |
| S/CB: Cambourne                    |   |



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| S/NS: Existing new settlements |  |
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## Rural southern cluster

| Policy   | Your comments |
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| Rural southern cluster - general comments                |               |
| S/GC: Genome Campus, Hinxton                             |               |
| S/BRC: Babraham Research Campus                          |               |
| S/RSC: Village allocations in the rural southern cluster |               |
| S/SCP: Policy areas in the rural southern cluster        |               |

## Rest of the rural area

| Policy  | Your comments |
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| Rest of the rural area - general comments         |               |
| S/RRA: Allocations in the rest of the rural area  |               |
| S/RRP: Policy areas in the rest of the rural area |               |

## Climate change

| Policy | Your comments |
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| <p>Climate change - general comments</p> | <p>Marshall agrees that planning to limit and mitigate the effects of climate change is of central importance. Cambridge East is being planned to achieve an exemplar development which can act as a flagship for the Councils' objectives. By pioneering new technologies and considering the long term welfare of our planet and its people, we believe Cambridge East can create a transformative green infrastructure connecting the City with the countryside that sets the new global standard for sustainability.</p> <p>The ambitions of Cambridge East include net zero embodied carbon and net zero operational carbon through careful design of infrastructure, carbon offsetting through local (if possible) sequestration via the creation of new or enhancement of existing areas of woodland and other habitats, sustainable water management for the wider area (not simply for the benefit of Cambridge East), and creating a 'green link' which will encompass many climate initiatives such as using green infrastructure to reduce the impacts of climate change (e.g. providing shade and reducing overheating). These commitments are set out in the Sustainability Vision that Marshall submitted in February 2020. These commitments will be developed further through Marshall's joint working with the GCSP.</p> <p>Marshall's view is that there is the potential for the sustainability benefits of Cambridge East to be even greater if development also includes land east of</p> |
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|   | <p>Airport Way, enabling planning at an even higher strategic scale.</p> <p>In line with the climate approach of the Local Plan, the ambitions of Cambridge East seek to provide a net zero operational development, and reduce embodied carbon to net zero through construction. Offsetting would ensure consideration at an on-site and local scale where feasible. In order to provide a holistic approach to carbon offsetting, it is recommended that consideration is given by GCSP to a holistic carbon offsetting strategy, and the demarcation of potential sites where the offsetting of the carbon impacts from allocated Local Plan development could bring additional local benefits. This will ensure that this intrinsically important, yet often difficult to apply, policy is targeted, local, and achievable. Marshall is happy to work in collaboration with GCSP in order to develop, agree and achieve a strategy which works for all. Through collaboration a truly balanced plan will be created, in which the 4 pillars of the Local Plan objectives are achieved by embracing growth rather than resisting it.</p> <p>More detail is provided below when responding to specific proposed policies.</p> |
| <p>CC/NZ: Net zero carbon new buildings</p> | <p>Marshall is supportive of the net zero requirement of the Local Plan, which is in line with the ambitions at Cambridge East. The aspirations look to achieve net zero operational carbon and embodied carbon. Any remaining carbon will be offset at a site, local,</p>  |

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|  | <p>and regional scale. Marshall's ambition would be to ensure that any offsetting would be undertaken locally where possible.</p> <p>Marshall also welcome the prospect of developing a more detailed approach to the use of materials with low embodied carbon, and to the achievement of a circular economy. Whilst carbon reduction is an intrinsic aspect of the Cambridge East ambition, as a team we welcome more specific emerging policies so that we can work with the authorities to test our vision.</p>   |
| <p>CC/WE: Water efficiency in new developments</p> | <p>In line with the Local Plan, Marshall recognises the complexities of water scarcity and welcome the weight placed on addressing this critical issue. Whilst the Local Plan must promote development, this needs to be sustainable and attainable. As the Local Plan evidence base suggests, this means focusing development in urban areas and developing policies for water efficiency, along with local strategies for delivery.</p> <p>Water efficiency, rainwater harvesting, and greywater harvesting will be intrinsic to the emerging water management strategy at Cambridge East from the outset.</p> <p>Marshall does, however, recognise that additional strategic water strategies will be required to facilitate the wider Local Plan, with potential solutions such as new reservoirs being considered. Cambridge East is keen to liaise with WRE and</p> |

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|  | <p>stakeholders in order to formulate a solution which gives certainty to communities.</p>  |
| <p>CC/DC: Designing for a changing climate</p>         | <p>Cambridge East is being designed to mitigate and respond to climate change, and as a result we welcome the proposed Local Plan policies.</p> <p>Buildings will be designed to reduce overheating given their proposed orientation, ventilation, and through the appropriate design of streets and green infrastructure. Site wide approaches will also be adopted, including SuDS and urban greening.</p> <p>Cambridge East will be fully compliant with the policies proposed.</p>  |
| <p>CC/FM: Flooding and integrated water management</p> | <p>Marshall agrees with this policy and is fully supportive. Cambridge East lies within Flood Zone 1 and is therefore at a low risk of fluvial flooding.</p> <p>The potential for all flood sources, including pluvial (overland surface water runoff), will be fed through design development, ensuring that flood risk is not increased elsewhere and that the development itself remains safe. This will be an integral part of the green infrastructure strategy, with 'blue corridors' maintained for preferential exceedance flow routes.</p> <p>This will ensure natural flood management is provided, in line with the principles of the Local Plan. This will ensure that the development is future proofed, and that water management is integrated within the emerging vision.</p> <p>Cambridge East's vision is for an exemplary water management strategy, ensuring that surfaces remain permeable where feasible, and that runoff rates are not increased above those existing. This is</p> |

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|  | <p>in line with the Local Plan proposals. Rainwater harvesting is top of the drainage hierarchy and is being explored in detail at Cambridge East, with potential discharge into and extraction from the aquifer using innovative techniques to maximise wider benefits, including for biodiversity. Further discussions will be held with WRE, the EA, and Anglian Water. Marshall also agrees that the future of SuDS within developments needs to be defined, and in line with the Local Plan proposals we will put in place robust management and maintenance plans to ensure that the highly sustainable water management strategy functions as intended for the lifetime of the development.</p>  |
| <p>CC/RE: Renewable energy projects and infrastructure</p> | <p>Marshall supports this policy, with regards to reducing carbon and increasing reliance on renewables. The emphasis will be to support the design of development that is very energy efficient. The potential for the use of on-site and local off-site renewables is also to be investigated as the vision develops and Marshall is currently seeking support to help develop an energy strategy focussed on renewables for Cambridge East.</p> <p>Marshall also appreciates, however, that there is significant movement towards greening of the centralised national grid. Marshall considers it may be more efficient in the future to utilise green energy from the grid rather than to produce it locally and therefore believes policy should be flexible enough to support that if necessary.</p> |

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| <p>CC/CE: Reducing waste and supporting the circular economy</p> | <p>Marshall is supportive and agree that a holistic approach should be taken to reducing waste and supporting the circular economy.</p>   |
| <p>CC/CS: Supporting land based carbon sequestration</p>         | <p>Marshall is supportive of a policy that seeks to ensure that carbon offsets required in order to achieve net zero, are directed locally and should also seek to support other eco-system functions too.</p> <p>Marshall understands that offsetting embodied carbon from construction of Cambridge East could facilitate the creation of significant areas of new habitat locally, for example large scale woodland planting, or the enhancement of existing habitats such fenland and soils. This could create multiple benefits such as enhanced biodiversity resources and new areas for recreation.</p> <p>However, in order to allow this to occur, Marshall understand that a planning mechanism will likely need to be developed so that land that could support such opportunity has been identified and made available without land ownership and other potential constraints. There will also need to be consideration paid to how a local carbon offset scheme is accredited. Marshall would be delighted to work with GCSP on scoping out such a scheme.</p> <p>Marshall does, however, query recent consultation from GCSP which states that offsetting through afforestation should exclude existing farmland. In order to achieve carbon offsetting through local</p> |

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|  | <p>sequestration large areas of land will be needed and so ruling out farmland may be premature. Confirmation of this is therefore sought, in particular as to whether this includes all farmland, or farmland which is of a certain quality or currently operational.</p> |
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## Biodiversity and green spaces

| <b>Policy</b>                                    | <b>Your comments</b>   |
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| Biodiversity and green spaces - general comments | <p>Marshall is thoroughly supportive of a Local Plan that seeks to ensure an enhanced biodiversity resource, with new and better green spaces, within the city of Cambridge and its surrounds. Marshall appreciates that cities that can provide access to a range of green spaces including those that support high levels of biodiversity are better for the people that live there and the environment more generally. The ambitions of Cambridge East align with that of the Authorities as has been set out in the Local Plan evidence submitted by Marshall. Cambridge East can help the GCSP achieve their Local Plan proposals by providing significant green infrastructure to, amongst other things, help provide an enhanced biodiversity resource, a natural water management solution and formal and informal areas for recreation.</p> |
| BG/BG: Biodiversity and geodiversity             | <p>Marshall acknowledges the GCSP's emerging target to achieve Biodiversity Net Gain (BNG) of at least 20%. This is a challenging target but Marshall appreciates the ambition given the global biodiversity crisis and that locally there is seen to be a significant opportunity to 'double nature'.</p>   |



However, it is appreciated that it comes not without its challenges, as achieving BNG of this level on a site where development is proposed, is likely in many cases to prove to be very difficult given other land-use constraints. Marshall's view is that, as a result, there will be a need for GCSP to have clearly identified appropriate planning mechanisms for achieving off-site BNG provision likely through the ability to buy off-sets. This should be achieved in areas identified as having strategic biodiversity potential, for example the Local Nature Networks or areas identified as priorities in the Greater Cambridge Green Infrastructure Strategy. This will allow off-site BNG to be targeted in the areas where it will provide most potential value, and balanced against other needs for open and green spaces, including for recreation and wellbeing of existing and future residents.

Marshall would like to, as a part of the evolving Local Plan process, work with the GCSP to help develop these mechanisms. For Cambridge East, Marshall commits to seeking to achieve Biodiversity Net Gain of 20% or more. The ambition will be to achieve as much of this as is possible through on-site BNG provision and via a significant Green Infrastructure Strategy that will include a major green corridor that will run from west to east through the development. In addition, green infrastructure of value for biodiversity will penetrate the built environment too, creating a series of green networks that will allow wildlife to occupy the urban

areas of Cambridge as well as the large areas of greenspace.

If development is confined to the airfield, Marshall will seek to achieve BNG of 20% or more within the area of the airfield itself albeit the initial view is that even with large scale green infrastructure provision there is likely to be a need for some off-site provision. For this Marshall would seek to engage with the GCSP to utilise any BNG off-set mechanism that has been developed (and as stated previously Marshall would like to engage with GCSP as soon as is possible to help support the development of such a scheme).

If the extent of the development area was to be extended to cover land to the east of Airport Way, Marshall would propose to continue the green corridor through the development. This would have the benefit of creating an accessible green link that extends from the centre of Cambridge to the countryside that lies to the east. In fact, and as shown in the Cambridge East submission Marshall made in December 2020 to support the evidence base for the Local Plan, if access could be achieved across only a small area of land just to the south and north of the A14, this connection could extend all the way into the area of the Wicken Fen Vision, creating a hugely significant new green network and active travel route. This could potentially link to green infrastructure being proposed as part of

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|                                    | <p>Anglian Water's DCO for the Cambridge Waste Water Treatment Works.</p> <p>Development in this area would also support the potential re-wetting of Teversham Fen which occurs in land east of Airport Way. This would have a multitude of benefits for wildlife including through the reinstatement of an important biodiversity habitat in its right, and by potentially taking visitor pressure from nearby and more sensitive fenland. Although Marshall has not yet investigated the feasibility of this in detail, it is thought most likely achievable if development was to occur to the east of Airport Way so that surface water run off could be utilised.</p> <p>In summary, Marshall therefore support the ambition of BNG of 20% or more and will be seeking to achieve this at Cambridge East. The focus will be on provision on-site, but we acknowledge that it is likely that off-site provision will also be required. To achieve this Marshall would like to engage with GCSP at the earliest possible point. In addition Marshall feel that the greatest BNG opportunity would come with extending development and BNG provision to land east of Airport Way, thereby allowing a more extensive Green Infrastructure network to be created.</p> |
| <p>BG/GI: Green infrastructure</p> | <p>Marshall is supportive of ambitious targets for green infrastructure provision within developments. As detailed in the response above related to biodiversity, Marshall is developing ambitious plans</p>  |

to accommodate green infrastructure that provides a high value biodiversity resource.

However, Marshall also recognises that biodiversity enhancement is only one part of the green infrastructure solution and therefore proposes to make green infrastructure multi-functional. The evolving proposals for Cambridge East support the inclusion of other ecosystem services including in particular: natural water management including sustainable drainage and natural filtration beds; carbon sequestration through new tree planting and other habitat and soil enhancement on-site and off-site; urban cooling; food growing; air quality amelioration; soundscaping; improving landscape character; urban greening; provision of formal and informal recreational space; and others. These meet well the themes of the GCSP as set out in the Green Infrastructure Recommendations Report.

In addition, Marshall is keen that Cambridge East helps support a further spatial theme: enhancement of the eastern fens, which is identified in the same GI Recommendations Report. Marshall is keen to discuss with the GCSP whether, for Cambridge East, any off-site (or on-site, if development was to occur east of Airport Way) BNG that may be sought, or carbon sequestration initiative, could also lead to helping support meeting of the key objectives, which include creating wildlife corridors and helping reduce negative impact from access, that relate to this spatial theme. Given the achievement of these

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|   | <p>objectives would require works being undertaken on land owned by others we would be keen to understand, and support the development if necessary, of a process that allows this to occur through development contributions.</p> <p>Finally Marshall would welcome the Local Plan requiring all, or at least developments of a significant scale, to be required to seek green infrastructure accreditation, for example through the Building with Nature scheme.</p>  |
| <p>BG/TC: Improving Tree canopy cover and the tree population</p> | <p>Marshall appreciates the strategic ambitions to increase tree cover within Cambridge and wider Cambridgeshire more generally. Tree and hedgerow planting are therefore a fundamental part of the Cambridge East proposals including within the green corridor, the developed areas themselves (including through the provision of street trees), and possibly from carbon sequestration elsewhere in Cambridgeshire. Given also that trees within the airfield occur rarely, there is significant potential for major gain.</p> |
| <p>BG/RC: River corridors</p>                                     | <p>Marshall supports the proposed policies within the Local Plan evidence although the direct benefits that Cambridge East can have to support them are limited given that no river corridor will be affected.</p> <p>Proposals at Cambridge East which may have indirect benefit include the opportunity to recharge the groundwater aquifer, which may have wider water catchment benefits, including for chalk streams. Furthermore, runoff will be dealt with</p>  |

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|   | <p>through sustainable drainage with this likely including the use of channels as conveyance, and with the ambition to design these to be as natural as possible. Emphasis will also be placed on ensuring that surface water runoff is treated where it is necessary, and by natural means where possible.</p>   |
| <p>BG/PO: Protecting open spaces</p>              | <p>As a result of development at Cambridge East, Marshall predicts there will be no impact on existing accessible open spaces but plenty of opportunity to create new spaces – see next.</p>  |
| <p>BG/EO: Providing and enhancing open spaces</p> | <p>The Cambridge East proposals align with the 2018 Local Plan requirements, with significant formal, such as sports pitches and urban squares, and informal, such as new accessible ‘countryside’ in the green corridor, proposed. In addition, the greenspace is to be dispersed, occurring throughout the development and within the developed areas themselves. The ambition is to ensure that where appropriate green spaces are multi-functional, but that they also have one key ambition that should not be compromised.</p> <p>Marshall is placing a significant emphasis on the creation of active travel only streets and want to create a development that is less reliant on the car and that encourages people to travel by active means. The active streets will also become green spaces in their own right, providing opportunities for new playspace and areas to socialise within.</p> |

## Wellbeing and inclusion

| Policy  | Your comments   |
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| Wellbeing and inclusion -<br>general comments | <p>Marshall is aligned with the GCSP's aim to help people in Greater Cambridge to lead healthier and happier lives and ensuring that everyone benefits from the development of new homes and jobs. Marshall strongly supports the Councils' aim to ensure growth benefits local residents and recognises that the development of Cambridge East has an important part to play. Cambridge is one of the most unequal cities in the UK and has some of the least affordable housing. It also has pockets of deprivation, especially in the east of the city.</p> <p>Pages 188 and 189 of the 'First Proposals' document recognises that the wellbeing and social inclusion themes can be best achieved by:<br/> <i>“providing good quality, affordable housing in accessible locations; providing good access to services and facilities; creating places that enable healthy and active lifestyles and social interaction; supporting access to education, employment and training opportunities; promoting sustainable and active travel; providing community and shared spaces; and protecting and providing public access to open spaces and the natural environment.”</i></p> <p>Cambridge East has the scale to achieve transformational change in the east of the City that will significantly improve the lives of local residents through the provision of a range of job opportunities, affordable homes and a range of</p> |

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|   | <p>cultural, leisure and retail options. Marshall takes its role as a key Cambridge stakeholder very seriously and is committed to the long-term, patient development of a high-quality new quarter. The mix of uses – commercial, residential, retail, educational, cultural and leisure will ensure a high quality of life for residents, workers and visitors.</p> <p>The wellbeing and inclusion objectives can only be truly achieved by embracing and harnessing inclusive growth. Cambridge East provides an opportunity to address a number of the inequality issues in the eastern part of the City through the generation of benefits and opportunities for those who live in more deprived areas, whilst enabling access to affordable homes, employment and education opportunities, a comprehensive green infrastructure network and a range of community services / facilities.</p> <p>Marshall is also committed to working with the NHS stakeholders in the area, including the CCG and Cambridge University Hospitals NHS Foundation Trust to understand how the health needs of future residents can best be met, when planning a development at scale.</p> |
| <p>WS/HD: Creating healthy new developments</p>         | <p>Please refer to the general comments on wellbeing and inclusion as creating healthy new developments is at the heart of the approach for Cambridge East.</p>   |
| <p>WS/CF: Community, sports, and leisure facilities</p> | <p>Marshall recognises the role that community, cultural, education, sports and leisure services and</p>  |



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|   | <p>facilities play in creating vibrant, healthy and sustainable places. On that basis, Marshall supports the principle and role of Policy WS/CF in establishing the need and appropriate locations for new or replacement services / facilities. The scale of development at Cambridge East provides a significant opportunity to meet, not only the needs of the future Cambridge East residents, but also a wider demand for community, sports and leisure facilities. Cambridge East is intended to be truly mixed use and will provide an opportunity to deliver enhanced community, sports and leisure facilities, close to the city centre that might not be capable of being accommodated on other more constrained sites. Marshall will work with the community and key stakeholders to understand what type of facilities are currently missing in Cambridge and what the local community needs.</p> |
| <p>WS/MU: Meanwhile uses during long term redevelopments</p>                                    |   |
| <p>WS/IO: Creating inclusive employment and business opportunities through new developments</p> | <p>Marshall has been a key employer in Cambridge over the last 110 years and it is proud of its history and role within Cambridge. It intends that Cambridge East will be the next stage of its contribution to the city's social and economic life and therefore, Marshall has a strong interest in creating inclusive employment and business opportunities, in accordance with the policy objectives of Policy WS/IO. It is proposed that development at Cambridge East would accommodate businesses of all types. Although the</p>  |

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|  | <p>scale and location of the site would naturally draw nationally and internationally significant businesses of a larger-scale, small and medium enterprises, incubation space for start-ups and other flexible spaces would form part of the overall employment offering at Cambridge East, making it an inclusive place for all. The development of Cambridge East presents an opportunity to create inclusive employment and business opportunities that do not compete, but are complementary to, the surrounding existing employment clusters and the city centre. From a skills perspective, Cambridge East will build on the established and respected Marshall Apprenticeships by providing a wealth of skills, education and life-long learning opportunities for people of all socio-economic backgrounds and academic abilities, equipping them for a life of self-sufficiency and ensuring that everyone is able to fulfil their true potential.</p> <p>Cambridge East provides an opportunity to provide employment space and unlock transport infrastructure to catalyse growth in the area. This will be matched by the significant quantum and range of homes – providing affordable and high-quality options that mean Cambridge can maintain its status as an attractive place to live and work. Cambridge East has the potential to include significant educational and sports opportunities, alongside a range of other leisure uses which local people can utilise but also that encourage people to visit the area, spending money and facilitating</p> |
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|  | <p>further economic activity. Cambridge East can be an economically and environmentally sustainable place in its own right and contribute to the sustainable growth of Cambridge and the Greater Cambridge Area.</p> |
| <p>WS/HS: Pollution, health and safety</p> |  |

## Great places policies

| Policy   | Your comments   |
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| <p>Great places – general comments</p>           | <p>Marshall supports the principle of this policy to create great places where people want to live, work and play whilst sustaining the unique characters of Cambridge and South Cambridgeshire. Cambridge East has a significant role to play in the creation of an extraordinary new place that complements and adds to the existing surrounding built development and communities. The creation of great places is embedded at the heart of the vision for Cambridge East and the scale and the significance of the site provides an opportunity to implement place-making. Cambridge East will be a place in itself, complementing the role and services offered by other city quarters – but also a place integrated with and completing the city. Further detail will be developed through the masterplan in collaboration with the GCSP.</p> |
| <p>GP/PP: People and place responsive design</p> |   |

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| <p>GP/LC: Protection and enhancement of landscape character</p>      |  |
| <p>GP/GB: Protection and enhancement of the Cambridge Green Belt</p> | <p>This policy rightly recognises that Cambridge Green Belt plays an important role in maintaining the special qualities of Cambridge as a historic city and the surrounding area. National planning policy reiterates the importance of protecting Green Belt for its openness and permanence and it is recognised that Cambridge's capacity for growth is constrained by its Green Belt designation. The NPPF is clear that Green Belt boundaries can be reviewed in response to the need for sustainable development where exceptional circumstances exist and that the process for doing so should be through the preparation of a Local Plan (Paragraph 140 of the NPPF). In addition, Paragraph 141 of the NPPF states that exceptional circumstances for releasing Green Belt land may exist where all other reasonable alternatives for meeting identified needs have been fully examined. This includes the following:</p> <ul style="list-style-type: none"> <li><i>“a) makes as much use as possible of suitable brownfield sites and underutilised land;</i></li> <li><i>b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and</i></li> <li><i>c) has been informed by discussions with neighbouring authorities about whether they could</i></li> </ul> |

*accommodate some of the identified need for development, as demonstrated through the statement of common ground.” (NPPF Paragraph 141)*

Marshall’s representations to the ‘Development Strategy’ section identify that the Greater Cambridge Local Plan could go further and be more ambitious in relation to its growth targets if the economic potential of the Greater Cambridge area is to be truly realised, in line with the commitments in the Devolution Deal and as outlined in the CPIER. In the first instance, in accordance with NPPF Paragraph 141, the GCSP should seek to optimise the density of development on non-Green Belt land and, as identified in our representations, there is an opportunity to further optimise the development on the safeguarded land at Cambridge East.

In the longer-term, Marshall considers there is potential to build on the excellent accessibility of the location and to extend development to the east of Airport Way without causing harm to the character of the City of the function of the Green Belt. The development would be landscape-led and will incorporate a green infrastructure strategy that responds to the site’s setting and protects surrounding Green Belt land.

If land is to be released from the Green Belt to accommodate future needs, land to the east of the

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|  | <p>Airport is a primary candidate due to the accessibility of the site and the excellent sustainability benefits that could be generated. Although the Green Belt Assessment (2021), which supports the Local Plan, identifies areas east of Airport Way as 'Very high' harm rating to the Green Belt, this is the same of land on all sides of Cambridge. Actually, when the contribution that land east of Airport Way makes to each of the separate purposes that were considered in the Assessment, it is clear that land on other sides of the City are more sensitive and are of a higher landscape quality. The Green Belt studies / assessments that were prepared from 2002 onwards in support of the previous and current adopted Local Plans all recognised that land to the east of Airport Way has landscape value and is important to the setting of Cambridge. This was true, however, of all Green Belt land around Cambridge. What these studies appeared to indicate is that releasing land to the east of the city would have a lesser impact in Green Belt terms than directing development towards more sensitive edges of the City. It is felt that perhaps the rating of 'very high' level of harm in this latest Green Belt Assessment is not wholly accurate or consistent with previous Green Belt reviews, and should be re-considered, particularly taking into account the GCP's intention to relocate the Park and Ride into this area.</p> |
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|  | <p>Marshall are very mindful of the need to respect the setting and separation of existing communities surrounding the site, particularly Teversham and Cherry Hinton. Proposals for Cambridge East will be sensitive to this and will be compatible with Green Belt objectives in this regard. However overall, when considering the sensitivities of Green Belt land around Cambridge as a whole, the east of Cambridge is considered to be less sensitive in Green Belt terms than other locations around the edge of Cambridge and the release of land here, as part of a comprehensively planned urban expansion, would maximise the scale of the opportunity and secure additional benefits from the synergy which the land can have with development of Cambridge East.</p> |
| <p>GP/QD: Achieving high quality development</p> | <p>Marshall has a long and proud history in Cambridge, being one of the largest employers over the past 100 years. Marshall has a strong vision for Cambridge East and it sees the redevelopment of the site as an excellent opportunity to create the next stage of its contribution to the city's social and economic life. Therefore, Marshall has a strong interest in creating a high quality development and is committed to delivering a scheme that improves the quality of life for all and that achieves strong legacy benefits.</p> <p>Marshall has appointed a full consultant team to help deliver this vision and the team wishes to work with the GCSP and local communities / stakeholders to develop design principles and a</p>                                  |

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|   | design process that can inform a positive Local Plan policy for the site. |
| GP/QP: Establishing high quality landscape and public realm |   |
| GP/HA: Conservation and enhancement of heritage assets      |   |
| GP/CC: Adapting heritage assets to climate change           |   |
| GP/PH8: Protection of Public Houses                         |   |

## Jobs policies

| Policy                  | Your comments   |
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| Jobs – general comments | <p>Marshall’s vision for Cambridge East strongly aligns with the Local Plan’s aim to encourage a flourishing and mixed economy in Greater Cambridge, which provides for a wide range of jobs whilst maintaining the area’s global reputation for innovation. As a successful business that has been rooted within Cambridge for over 110 years, Marshall is keen to deliver a scheme at Cambridge East that is truly mixed-use and provides employment opportunities at all levels across a range of uses.</p> <p>Marshall has a long legacy of investing in skills. Cambridge East will build on the established and respected Marshall Apprenticeships by providing a wealth of skills, education and lifelong learning</p> |



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|   | <p>opportunities for people of all socio-economic backgrounds and academic abilities, equipping them for a life of self-sufficiency and ensuring that everyone is able to fulfil their true potential.</p>   |
| <p>J/NE: New employment development proposals</p> | <p>Marshall supports the intended purpose of this policy, which is to identify suitable locations for employment proposals and potential uses that might be acceptable in these locations. This Local Plan provides an opportunity to truly maximise the scale and quality of the opportunity to add to the Cambridge story through the realisation of the area's economic potential, whilst integrating with and serving the local population. There are clear sustainability benefits to focusing employment development at appropriate and accessible locations that are well linked with existing and committed transport links.</p> <p>Cambridge East has a number of characteristics that make it a unique opportunity for the area. The potential exists for a combination of a research hub, space for all levels of education and the commercial space to accommodate both large scale global occupiers and the flexible, affordable space for the small, high growth businesses for which Cambridge is renowned. Cambridge East can include maker spaces to provide spaces for creative industries and entrepreneurs, space for growing sectors that require mid-level skills, and the leisure and retail offer will provide opportunity for entry level jobs. This will create a mix of employment and training</p> |

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|   | <p>opportunities suitable for residents of different skill levels as Marshall can expand the offering of the Marshall Apprenticeship programme.</p> <p>Cambridge East can deliver a development that offers economic and sustainability benefits that cannot be delivered elsewhere. It will make a significant contribution to the target of doubling GVA by delivering both more jobs and more productive jobs. It will attract and grow jobs in higher productivity sectors, transport investment will increase agglomeration effects across the city and investment in training will help existing residents boost their skills and productivity. The mix of jobs and types of employment floorspace to support these jobs at Cambridge East will be the subject of further discussion and testing with the GCSP.</p> |
| J/RE: Supporting the rural Economy          |   |
| J/AL: Protecting the best agricultural land |   |
| J/PB: Protecting existing business space    | <p>The purpose of this policy will be to protect employment land from loss to other uses and in this context, Marshall wishes to comment in respect of its existing business at Cambridge Airport and its relocation proposals. As identified, Cambridge East is one of the largest and most sustainable brownfield sites in Greater Cambridge. Its location and the scale of the opportunity make it an important part of Greater Cambridge's growth strategy over the next 20+ years.</p>   |

Marshall has recently announced that its preferred site for relocation of its aerospace and defence business is at Cranfield Airport. The evidence prepared confirms that there is no obvious commercial, planning, technical or regulatory impediment to a move to Cranfield, a position which will further crystallise through the preparation of the Outline Planning Application. Marshall is confident that the proposed site at Cranfield can meet its current space and operational requirements. As such, Marshall will shortly begin the process of preparing an outline planning application, with submission planned in Autumn 2022. Marshall is aiming for the planning permission to be issued in early 2023. Planning permission would give the GCSP and Department for Levelling Up, Housing and Communities further confidence that Cranfield is a deliverable option for Marshall and that this in turn would enable Cambridge East to be delivered.

Whilst the aerospace and defence parts of the business need to be relocated due to reliance and need for an accompanying, there are other parts of the business that are able to function without a runway. On that basis, Marshall are considering options for retaining elements of the business in either Greater Cambridge or wider Cambridgeshire, which would align with the positive intention of Policy J/PB.

Therefore, the development of Cambridge East has two consequences of strategic importance. As well

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|   | <p>as unlocking the development of a world class anchor development at Cranfield that builds on significant synergies with Cranfield University, the relocation to Cranfield would significantly contribute to sustainable economic growth in the East. The relocation then paves the way for the delivery of a truly mixed-use scheme in Cambridge East that optimises the use of the land and will provide the range and mix of jobs Cambridge needs.</p>  |
| <p>J/RW: Enabling remote working</p>                              |  |
| <p>J/AW: Affordable workspace and creative industries</p>         | <p>It is proposed, through this policy, that affordable workspace is required to be delivered through the larger commercial developments. Marshall is supportive of this policy intent and committed to providing a scheme that offers a broad range of opportunities. The delivery of a wide range and mix of employment floorspace is an important consideration in the evolution of the design of Cambridge East. Marshall has instructed specialist commercial advisers to provide advice on what mix of uses Cambridge East should be looking to deliver. This advice will also serve to ensure that Cambridge East is both fit for today's requirements, but is also sufficiently flexible to ensure it is future proofed.</p> |
| <p>J/EP: Supporting a range of facilities in employment parks</p> |  |
| <p>J/RC: Retail and centres</p>                                   | <p>The intent of this policy is to identify the approach to retail and leisure uses across Cambridge. In Marshall's work to date, proposals for Cambridge</p>  |

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|  | <p>East include the potential to develop a local centre, but also accommodate complementary (rather than competitive uses) which cannot fit within the City Centre but which would enhance the overall Cambridge experience and offer. Within the 'First Proposals' consultation document and supporting evidence base, there is strong support for the type and mix of uses that Marshall is proposing. Section 3 of Part 2 of the Strategy Topic Paper notes that Cambridge East can provide:</p> <ul style="list-style-type: none"> <li>- <i>“A mix of employment uses, including offices, workshops and other uses, providing a variety of opportunities to support not only Cambridge’s high technology clusters, but also industry and creative uses, including local jobs to provide for existing communities and help contribute to community integration.”</i> (page 114, Strategy Topic Paper)</li> <li>- <i>“A new centre for retail, cultural and other uses that will serve the urban quarter and wider area whilst complementing and not competing with the historic City centre.”</i> (page 115, Strategy Topic Paper)</li> <li>- <i>All necessary supporting community infrastructure including primary and secondary schools”</i> (page 115, Strategy Topic Paper)</li> </ul> <p>It also states that:</p> <ul style="list-style-type: none"> <li>- <i>“Land at Cambridge East has long been recognised as having significant potential to be a sustainable major new eastern quarter for Cambridge, that is well connected to the rest of</i></li> </ul> |
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|   | <p><i>the City, with a mix of homes and a range of jobs and services and supporting infrastructure”</i> (page 118-119, Strategy Topic Paper)</p> <p>- <i>“At Cambridge East there will be an opportunity to provide a range of new employment space that meets the needs of our key sectors identified in the ELR, including office / R&amp;D floorspace and space for businesses that would provide local job opportunities for residents previously employed at Marshalls, as part of a mixed- use development, to help contribute to community integration.”</i> (page 86, Strategy Topic Paper)</p> <p>Marshall is pleased that the GCSP recognise that there is opportunity at Cambridge East to provide a range of retail and leisure services and facilities to serve the Greater Cambridge population and looks forward to collaborating with the GCSP, local community and local stakeholders to flesh out the range, scale and mix of uses that Cambridge East can accommodate.</p> |
| J/VA: Visitor accommodation, attractions and facilities     | Please refer to the response in relation to Policy J/RC.  |
| J/FD: Faculty development and specialist / language schools |   |

## Homes policies

| Policy | Your comments |
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| <p>Homes – general comments</p> | <p>Marshall is strongly supportive of the principle of planning for enough housing to meet the needs of Greater Cambridge including the provision of significant quantities of housing. There is an opportunity, through the preparation of this new Local Plan, to be ambitious and the GCSP should therefore be seeking to identify a suitable housing requirement that balances with the economic growth ambitions of CCC/SCDC and the wider area. Whilst Marshall is supportive of the GCSP's approach to deliver more homes than are required by the standard method, it is Marshall's view that there is a significant opportunity for the GCSP to consider increasing this target as a positive response to the evidence base and the scale of potential employment growth.</p> <p>The development of Cambridge East provides a significant opportunity to tackle the affordability crisis that exists within Cambridge through accommodating a wide range of homes, of different sizes and tenures. The final mix will be determined by the latest market advice and will be discussed and agreed with the GCSP through future discussions, affordable housing policies and guidance, as well as site specific negotiations relating to a scheme of this scale.</p> |
| <p>H/AH: Affordable housing</p> | <p>This policy sets out that a 40% affordable housing requirement will be required from new developments coming forward. Further work is underway, including consideration of the implications of the introduction of First Homes on</p>  |

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|   | <p>the provision of other affordable tenures. New housing developments of 10 or more dwellings will be required to provide an appropriate mix of housing sizes (number of bedrooms), with the proportions of dwellings of each size to be guided by the housing mix for each tenure. Marshall supports this policy direction and intends to deliver a policy compliant development at Cambridge East that offers wide ranging housing benefits, including to those in greatest housing need.</p>  |
| <p>H/ES: Exception sites for affordable housing</p> |   |
| <p>H/HM: Housing mix</p>                            | <p>This policy has begun to consider the mix of homes that are needed across Greater Cambridge to support the area's needs. The policy identifies some broad ranges as recommendations for housing mix, but encourages applicants to work collaboratively with a Registered Provider, the relevant Councils housing team, and the Greater Cambridge Shared Planning service, to discuss the final mix (market and affordable) for a new development ahead of the submission of a planning application. Marshall welcomes this approach.</p> <p>The mix of housing options at Cambridge East has been developed to meet the needs of the local population – including student accommodation and purpose built Build to Rent (B2R) options for those working or studying at the university or in shorter term roles at the research hub or with businesses. There are also a range of affordable flats and houses to meet the needs of those on lower</p> |



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|                              | <p>incomes. The range of units is also being developed to accommodate the needs of the middle earners who may not qualify for affordable housing options, but nonetheless require high quality but affordable options. The work is being developed with a view to maximise internalisation (the number of people who live and work on site) as much as possible; as such there would be a range of sizes of flats and houses to accommodate the diverse needs generated by the site and its local context.</p> <p>The work that Marshall has undertaken so far on housing mix broadly aligns with this policy, but the deliverability and viability of these requirements may need to be reviewed as development proposals emerge.</p> |
| <p>H/HD: Housing density</p> | <p>The policy intent in relation to housing density confirms that there will not be a blanket requirement, but instead housing densities will be determined on a site specific basis. This is largely justified on the basis of site specific constraints (historic character) and opportunities (transport accessibility).</p> <p>Marshall is supportive of a design-led approach to density that encourages each site to make the best use of land, whilst remaining sensitive to local character. Marshall has recently appointed specialist landscape architects who will be advising on the opportunities and constraints across the Cambridge East site and what these mean for</p>  |

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|  | <p>densities and heights that can be supported across the development. It is intended that this work will feed into the discussions that Marshall will continue with the GCSP in order to help in demonstrating the capacity of the site and begin to establish design principles and draft local plan site allocation policies.</p> |
| H/GL: Garden land and subdivision of existing plots        |  |
| H/SS: Residential space standards and accessible homes     |  |
| H/SH: Specialist housing and homes for older people        |  |
| H/CB: Self- and custom-build homes                         |  |
| H/BR: Build to rent homes                                  |  |
| H/MO: Houses in multiple occupation (HMOs)                 |  |
| H/SA: Student accommodation                                |  |
| H/DC: Dwellings in the countryside                         |  |
| H/RM: Residential moorings                                 |  |
| H/RC: Residential caravans                                 |  |
| H/GT: Gypsy and Traveller and Travelling Show People sites |  |
| H/CH: Community led housing                                |  |

## Infrastructure policies

| Policy                                   | Your comments   |
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| <p>Infrastructure – general comments</p> | <p>Paragraph 22 of the NPPF states <i>“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”</i></p> <p>In addition, the NPPF (at paragraph 73) states that the supply of large numbers of new homes can often be achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well-located and designed, and supported by the necessary infrastructure and facilities.</p> <p>The spatial development of Cambridge to date partly reflects a lack of transport investment; therefore, Marshall supports the GCSP’s policy intent to focus on planning for the right services, facilities and transport opportunities in the right place, and bringing these forward at the right times to support the delivery of housing and employment.</p> <p>Marshall extends it support to the Local Plan’s intention to distribute development to locations that</p> |

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|  | <p>can make the most of existing infrastructure and that present opportunities to address any infrastructure deficits. The infrastructure deficit in the east of the city can only be transformed through a partnership of co-ordinated public sector working and high quality new development planned on a scale to incorporate infrastructure of real value.</p> <p>Cambridge East is identified in the transport evidence base reports as offers the opportunity to plan for both housing and employment at a scale which would provide a substantial contribution to the future needs of the city. The site provides an opportunity to deliver transformational solutions that unlock the investment needed in transport infrastructure to fix its economic geography. It provides the opportunity to improve connectivity to the city centre via a segregated link to the station, as well as improved connectivity to the existing clusters in the north and the south. This would result in benefits to residents – reduced journey times and reduced congestion – but also would create economic benefits by increasing the effective density of the city, making jobs effectively closer to each other, resulting in productivity benefits. The level of transport improvement that is possible will depend largely on the scale of development at Cambridge East. Commercial space and homes result in more transport journeys and therefore require more investment in transport, whilst making that investment more viable.</p> |
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I/ST: Sustainable transport and connectivity

As set out in the NPPF, the supply of large numbers of new homes can often be best achieved through planning for large scale development, provided that this development is supported by the necessary infrastructure. In order to ensure there is a genuine switch from car use towards sustainable modes of transport, new development must be supported by convenient, regular and affordable public transport, as well as safe and accessible pedestrian / cycle links.

Marshall supports the principles of sustainable transport and the aims of this policy which *“seek to deliver sustainable and inclusive communities by minimising the need to travel and reducing travel distances, whilst ensuring there is effective and sufficient sustainable transport mode choice and improved connectivity for everyone of any ability. It will require development to be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location.”* (Page 304, ‘First Proposals’ consultation document)

By locating growth in the most sustainable locations, that are well-connected to transport links and a short distance from key services and facilities, this delivers the tools to start generating a modal shift towards the use of sustainable travel methods. Marshall recognises this and have been developing a transport strategy, in collaboration with the County Council, GCP and Cambridgeshire &

Peterborough Combined Authority, that supports the level of growth that Cambridge East is allocated for within the 'First Proposals' document, but that also considers and explores what could be achieved if the scale of the opportunity at Cambridge East is maximised. The Site represents a significant opportunity to integrate and provide cross-city connectivity with the wider Greater Cambridge transport network and thus can interact with the city as a whole.

The transport evidence base documents are clear that Cambridge East is one of the best performing locations in transport terms. The site reduces the need to travel by car and generally contributes less to congestion in the peak periods than sites in other broad locations. Cambridge East would also achieve low mode shares of car use even without mitigation, linked to the proximity of the site to the city and the ability to access jobs and services on the site itself and nearby via non-car modes. This helps to establish good sustainable transport characteristics for the site. The use of active modes and public transport combined at Cambridge East can be a fundamental component of the transport strategy. The level of Park & Ride trips modelled indicates there may be scope to refine the assessment of the Cambridge Eastern Access scheme to achieve a higher proportion of trips from the site that use direct Public Transport services rather than drive to a Park & Ride site.

|   |  |
|---|--|
|   | Cambridge East is a catalyst for growth that can unlock the sustainable movement strategy for east Cambridge and contribute significantly towards a holistic solution for the city as a whole. It is only through intelligent growth, rather than a restricted approach to development, which can change the unsatisfactory status quo and bring transformational change in line with the Local Plan objectives. |
| I/EV: Parking and electric vehicles         |  |
| I/FD: Freight and delivery consolidation    |  |
| I/SI: Safeguarding important infrastructure |  |
| I/AD: Aviation development                  |  |
| I/EI: Energy infrastructure masterplanning  |  |
| I/ID: Infrastructure and delivery           |  |
| I/DI: Digital infrastructure                |  |

## Supporting documents on which we are consulting

| Policy  | Your comments |
|---|---------------|
| Sustainability Appraisal (incorporating the requirements of the Strategic Environmental Assessment) |               |
| Habitats Regulations Assessment   |               |