



Quod

---

**Representations  
to Reg 18 Greater  
Cambridge Local  
Plan Consultation  
Cambridge East**

---

30 JANUARY 2026

Q100433

# Contents

---

1	Introduction and Overview	2
2	Development Strategy	4
3	Policy S/CE: Cambridge East	9
4	Homes	21
5	Jobs	23
6	Skyline and Tall Buildings	24
7	Landscape and Open Space	28
8	Water	31
9	Infrastructure	33

# 1 Introduction and Overview

---

- 1.1 This document has been prepared by Quod on behalf of Marshall Group, who are owners and operators of approximately 285 hectares of land to the east of Cambridge, including Cambridge Airport. This document sets out Marshall's response to Greater Cambridge Shared Planning's (GCSP) consultation on the *Draft Greater Cambridge Local Plan – Regulation 18 Consultation*.
- 1.2 Marshall would like to take this opportunity to offer its support for GCSP's recognition that there is a need for the development of a vision for Greater Cambridge that tackles difficult issues like climate change and social equity head on. Marshall endorses that recognition and is committed to embedding these aims at the heart of its vision for Cambridge East.
- 1.3 Marshall supports the identification of Cambridge East within the Plan as a new urban quarter and an integral part of the strategy for realising GCSP's vision for Greater Cambridge. Marshall strongly supports the principle of the allocation of Cambridge East for a truly mixed-use development which will support a significant number of new jobs, homes, community services / facilities and key infrastructure, driving growth and regeneration on the eastern side of Cambridge. These representations do, however, raise concerns that the draft allocation does not extend to the full capacity of the opportunity, either in terms of the quantum proposed on the safeguarded land, or the omission of the 'expansion land', which represents a missed opportunity to deliver transformative growth.
- 1.4 The representations also include a number of observations on the detailed wording of the draft policies, which Marshall suggests should be amended to optimise the full potential of the allocation and to make the policy more robust.
- 1.5 These representations follow on from Marshall's engagement with earlier stages of the plan-making process and from regular discussions held with officers under the terms of an agreed Memorandum of Understanding.
- 1.6 Marshall considers that the draft plan is overly cautious in a number of respects – particularly in its failure to plan positively to meet the growth objectives of the NPPF or to respond sufficiently to the Government's objectives for Cambridge.
- 1.7 Since this emerging Local Plan consultation commenced, these expectations for growth in the national interest have been reinforced through the publication of a draft revision to the NPPF. The revised draft NPPF also proposes significant changes to national planning policy that have implications for plan-making. Whilst this draft Local Plan is being prepared and will be examined under the provisions of the NPPF 2024, these representations draw attention to the important objectives and policies which are apparent in the draft NPPF and which represent up to date government policy. Those objectives and policies will have immediate effect upon publication of the new NPPF and, as currently drafted, the local plan would be undermined. The approach to the local plan should be revised to ensure it can be sound and appropriate.
- 1.8 In relation to the development of Cambridge East, Marshall looks forward to working collaboratively with GCSP to ensure that the strategic opportunity that it represents is optimised.

1.9 The remainder of these representations are divided into the following sections:

- **Section 2:** Development Strategy and New Jobs and Homes targets;
- **Section 3:** Policy S/CE which allocates development at Cambridge East;
- **Section 4:** Housing policies;
- **Section 5:** Jobs policies
- **Section 6:** Policies relating to Skyline and Tall Buildings;
- **Section 7:** Landscape and Open Space policies;
- **Section 8:** Policies relating to Water Supply and Management; and
- **Section 9:** Infrastructure policies.

## 2 Development Strategy

---

### Policy S/JH – New jobs and homes

- 2.1 Two key policies in the draft Plan – Policy S/JH (New jobs and homes) and Policy S/DS (Development Strategy) – are principally responsible for setting the quantum of growth required to meet the objectively assessed needs for homes and jobs in Greater Cambridge and the direction of growth in terms of appropriate locations.
- 2.2 Policy S/JH of the Local Plan adopts the revised December 2024 Standard Method housing requirement for Greater Cambridge, which represents an overall increase in the proposed provision of housing across the plan period (48,195 homes (at 2,295 dwellings per annum) compared with 44,400 (at 2,111 dwellings per annum) proposed in the First Proposals. However, the more significant increase is with the proposed additional jobs, which jumps up to 73,300 additional jobs compared with 58,500 proposed in the First Proposals. The stated overall vision is commendable, but in planning to only meet its minimum housing requirement and in failing to respond with housing proposals that reflect the scale of the economic opportunity, the draft plan is too conservative. It fails to match the Government’s objectives for growth and the Government’s particular objectives for Cambridge.
- 2.3 In March 2024, the Government made its ambitions for Cambridge clear in the publication of its report – ‘*The Case for Cambridge*’. It recognises that Cambridge is ‘a central component of the UK economy’s overall success’ but acknowledges that the area faces a number of challenges that are holding back its potential. In addition to the known challenges around water and transport, the report highlights the significant housing scarcity and affordability problem in Cambridge. As the population and the economy has grown, unaffordable house prices and a lack of supply of housing have had a number of adverse consequences, including increasingly restricting the ability of business to expand. The draft plan does not sufficiently address these issues.
- 2.4 The NPPF is clear (at paragraph 69) that the requirement for new homes “*may be higher than the identified housing need if, for example, it ... reflects growth ambitions linked to economic development or infrastructure investment*”. Those are the circumstances of Cambridge where government policy directly reflects growth ambitions linked to economic development; and where the Government has recently committed £400m for infrastructure investment to enable that growth.
- 2.5 The Government’s ambitions for growth are also evident through the revisions proposed to the NPPF. The Government’s draft has stressed again the critical importance of economic growth by requiring development plans to take a “*positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas*” (Policy E1(1)(a)) and by requiring development plans to “*allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period*” (Policy E1(1)(c)). HO2(3)(b) confirms that housing requirement figures should “*Be higher than the overall figure identified in the local housing needs assessment where appropriate. This includes situations where a higher housing requirement is necessary to meet the needs of neighbouring areas, or*

*where it reflects growth ambitions linked to economic development or infrastructure investment”.*

- 2.6 The Strategy Topic Paper published as part of the evidence base confirms that a strategy which proposed a higher jobs forecast, and consequently higher level of homes to support that jobs forecast, was considered as an alternative. However, the ‘Central’ forecasting scenario was selected on the basis that it is prudent to build in assumptions that there will be slower or contracting periods and unforeseen shocks. Baking those assumptions into plan making is not consistent with Government policy – particularly policy for Cambridge.
- 2.7 The Employment and Housing Evidence Update 2025 recognises that the ‘High’ forecast of 90,900 jobs “could be achieved or exceeded”. For that to happen “*a step change in infrastructure investment and development would be needed to facilitate growth, notably in transport to connect in and move labour, as well as in wider services infrastructure and the expansion of both housing and commercial development programmes*”.<sup>1</sup> That is exactly the approach which a positively prepared plan should take.
- 2.8 The strength and potential of the Greater Cambridge economy is of national importance and there is policy in place at Government level to ensure that economic potential is optimised. There may or may not be a form of growth plan introduced by others in the future but, in the meantime, the Local Plan should play its full part.

## Policy S/DS (Development Strategy)

- 2.9 The first strategic priority for the Development Strategy as listed in paragraph 2.4 of the draft Plan is climate change and the objective of transitioning to net zero carbon by 2050 “*by ensuring that development is sited in places that help to reduce carbon emissions...*”. The NPPF is clear at paragraph 7 that “*the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner*”.
- 2.10 Through draft Policy S/DS, however, GCSP has opted for a blended strategy, directing development towards the Cambridge urban area, edge of Cambridge sites outside the Green Belt and dispersing the unmet growth requirements away from Cambridge, including to new settlements. The resulting strategy fails to plan for sufficient growth or to plan for it in the most sustainable locations.
- 2.11 A preferred hierarchy of locations for growth is identified in Policy S/DS, the order of which has informed by the Sustainability Appraisal at the various stages of plan preparation. The SA for the ‘First Conversation – Issues and Options’ in December 2019 established that development in the Cambridge Urban Area and on the edge of Cambridge were the two most sustainable locations for growth. There have been several iterations of the SA at the different stages of the

---

<sup>1</sup> To translate job numbers to housing numbers, the Employment and Housing Evidence Update assumes a maintenance of current commuting patterns (paragraph 4.31). Cambridge commuting patterns are long distance and reflect the scarcity of homes relative to jobs in the city. This is one of the documented constraints to economic growth and it has a severe impact on the daily quality of life of Cambridge workers. A more ambitious approach to housing numbers would be more consistent with the claimed vision for the plan.

Plan, across which 14 different spatial strategies for locating growth have been assessed but the findings have been the same.

- 2.12 Green Belt sites on the edge of Cambridge (the category within which the Cambridge East expansion land would fall) were considered in the SA as one of the alternative strategies for locating new development, as well as forming part of the hybrid spatial strategies for growth that were assessed. The assessment process tested the strategies against 15 separate sustainability indicators. Edge of Cambridge Green Belt sites were judged to perform well, and in some cases better, than sites allocated in the Plan against the key priorities of the development strategy. Critically for delivery within the Plan period and Government's ambitions to boost and speed up housing delivery, edge of Cambridge Green Belt sites were also found to be capable of delivering the most housing within the Plan period of the alternatives considered. The Strategy Topic Paper concludes that:

*"Edge of Cambridge – Green Belt sites perform better than new settlements in supporting trips by sustainable modes, being closer to existing jobs and services. The location of such sites would likely limit the need for completely new infrastructure, albeit development at such locations would likely add pressure to existing infrastructure, including green infrastructure, within Cambridge."* (Paragraph 5.70)

- 2.13 Consistent with GCSP's own objective for climate change, the identified hierarchy in Policy S/DS should lead to more development being proposed adjacent to Cambridge.
- 2.14 As a result of the Government's withdrawal of HIF funding earlier in 2025, which had been agreed to support the relocation of the CWWTP, GCSP has had to reconsider its growth strategy, which had previously relied in the 'First Proposals' on the delivery of 8,350 new homes and 15,000 additional jobs at North East Cambridge. Rather than observing its preferred hierarchy and allocating alternative land adjacent to Cambridge, however, GCSP has replaced the allocation with a new allocation away from Cambridge through for a new settlement at Grange Farm, which lies beyond the Green Belt on land adjacent to A11 and A1307, just north of Little Abington. The allocation of Grange Farm compromises GCSP's objectives for the Development Strategy by selecting a site that presents less favourable sustainability credentials, apparently to avoid proper consideration of Green Belt options in more sustainable locations adjacent to Cambridge. The plan should recognise that the strength of the hierarchy in Policy S/Ds in driving greater growth and achieving better carbon outcomes represents the exceptional circumstances necessary to justify Green Belt release.
- 2.15 The draft plan has been formed without an updated Green Belt Assessment, which is currently being undertaken. The Strategy Topic Paper confirms that the new Green Belt Study will be published after the draft plan consultation, and its findings will inform the Proposed Submission plan stage.
- 2.16 Until then, this version of the Plan is reliant on the Green Belt Assessment prepared in 2021, which was undertaken prior to amendments to national policy that have since put greater emphasis on increasing housebuilding and enabling Green Belt release where it is necessary to meet development needs. NPPF paragraphs 145 and 146 make clear that, where exceptional circumstances exist, then Green Belt boundaries should be reviewed with a view to identifying and prioritising development on Grey Belt and lower-quality Green Belt land in sustainable locations. The Regulation 18 plan's approach is flawed in several respects:

- It is out of date and out of step with current government policy;
- It is inconsistent with the Councils' own evidence base which supports an alternative strategy of concentration; and
- It is premature to GCSP's reassessment of Green Belt and Grey Belt sites around Cambridge which has not been completed.

2.17 The draft plan is wrong to assert that exceptional circumstances do not exist to justify revisions to the Cambridge Green Belt.

2.18 The suitability of land to the east of Airport Way to form part of an expanded Cambridge East allocation was set out in Marshall's Call for sites submission of March 2025. There is no evidence that the merits of that submission or its obvious alignment with the Development Strategy have been considered.

2.19 The 'expansion land' extends to 131 hectares and can accommodate thousands of homes and jobs as an in addition to the development allocated on the safeguarded Airport Land. The expansion land provides an opportunity to design and plan for a new urban quarter holistically and to optimise the opportunity for transformative growth, connected green infrastructure and to address the current lack of cross-city connectivity by enabling sustainable transport connections that can contribute to resolving the city's congestion issues.

2.20 To date, growth around Cambridge has not benefitted everyone equally – the east has higher levels of deprivation and unemployment. Cambridge East provides an opportunity to provide a thriving new urban quarter and to drive economic growth. The expansion of the site to include land to the east of Airport Way and north of Newmarket Road would provide the critical mass that unlocks the full scale of opportunity for sustainable growth. As Cambridge East is already to be developed, and the Park & Ride is to be relocated, a unique opportunity arises to plan the urban expansion to ensure maximum integration and synergy.

2.21 Proposals for Cambridge East station confirm the suitability of the location for growth. The revised draft NPPF consultation confirms the Government's intention to establish 'in principle' support for suitable proposals that develop land around stations within settlements and around well-connected stations outside settlements, including in the Green Belt. This approach recognises that sites near stations, even within the Green Belt, maximise opportunities for sustainable development, making the most of high levels of connectivity, and improving access to jobs and services<sup>2</sup>.

2.22 Whilst it is acknowledged that the Plan is being prepared and will be examined under the NPPF 2024, there is a clear direction of travel in the draft NPPF consultation. NPPF draft Policy S5 sets out the forms of development that should be approved outside settlements, which includes housing and mixed-use development that is physically well-related and within reasonable walking distance of a railway station with high level of connectivity (four trains per hour throughout the day). The same category of development is considered to be 'not inappropriate development in the Green Belt' through Policy GB7, subject to complying with the Golden Rules where this relates to major development. Draft policy GB3 also confirms that Green Belt

---

<sup>2</sup> 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system' – Page 15.

boundaries should be altered through the preparation and updating of local plans where this would enable development of land around stations.

- 2.23 In these circumstances, land should either be released from the Green Belt for development through Local Plans or would be approved through a planning application (subject to demonstrating compliance with other relevant parts of the NPPF).
- 2.24 This new decision-making policy in the NPPF will have immediate effect on publication of the NPPF and would present an opportunity for development on the expansion land to be approved through an application even if it were not to be allocated in this plan. Its proximity to the new station, coupled with its relationship to development on the safeguarded land and its ability to deliver development that achieves high quality development in a sustainable location means the site would have a strong case for being considered not inappropriate development in the Green Belt. Whilst the plan-making policies in the draft NPPF 2025 do not directly apply to this Local Plan, GCSP should not ignore the implications of the decision-making policies for future growth, particularly when they are so clearly important to the Government's growth objectives. Development that is likely to be found as not inappropriate within the Green Belt and which is so clearly aligned with up-to-date national policy should be reflected in this Plan's development strategy to ensure that the Plan is not immediately embarrassed.
- 2.25 Therefore, Marshall urges GCSP to consider the Call for Sites submission made in March 2025 and the clear substantive benefits of a larger allocation at Cambridge East. The opportunity to optimise the land allocated in the draft Plan as part of comprehensive and transformative growth enabled by the allocation of the expansion land would strongly align with GCSP's stated vision for the Development Strategy, whilst contributing substantially towards the Government's objectives for Cambridge.
- 2.26 Marshall and its consultant team are continuing to work closely with GCSP and would welcome the opportunity to further discuss the full extent of Cambridge East's contribution to the Development Strategy.

## 3 Policy S/CE: Cambridge East

---

- 3.1 Marshall is pleased that the strategic importance of the site to Greater Cambridge's growth strategy is recognised through this significant allocation and fully endorses the general principles identified for the site, i.e. the site is of strategic importance and will provide an inclusive new city district and vibrant urban quarter.
- 3.2 Cambridge East is also a development opportunity of national 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. The safeguarded land at Cambridge East is one of the most sustainably located sites outside of the Green Belt on the edge of Cambridge and represents the best opportunity to meet the GCSP's Local Plan aims and deliver significant growth through the creation of a new, but complementary quarter for Cambridge. The opportunity to optimise the capacity of Cambridge East and plan for forms of development that cannot be accommodated within the historic core means that the site's social, economic and environmental credentials should be maximised. 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 as part of the development.
- 3.3 Marshall is committed to delivering a scheme that is truly sustainable and of exceptional design quality. Marshall will vacate the entire Airport Site by 2029 whilst aiming to vacate parts of the site prior to 2029, to allow commencement of development as soon as possible.
- 3.4 Marshall supports that the policy enables details of the masterplan, strategic design code, parameter plans, strategic and local transport mitigation plan and other supporting strategies to be submitted alongside an outline application. Local Plan committee papers published in January 2023 recognised the potential implication for the preparation of additional policy documents (i.e. SPDs) on lead-in times for major development – acknowledging that lead-in times can be shortened by 2-3 years if that guidance is incorporated into the allocation. This approach will enable delivery at Cambridge East to come forward earlier than if an SPD or other policy document were required to be prepared and agreed in advance.
- 3.5 Notwithstanding the strong overall support for the policy, there are a number of detailed elements within the policy that Marshall considers are either too detailed for this stage of the Plan, start to prematurely predetermine a masterplan which the policy identifies is to be developed in collaboration with GCSP, the community, other stakeholder engagement and reviewed by the Cambridgeshire Quality Panel, and / or are not evidenced in the studies supporting the draft Local Plan. These matters have all been raised previously and will continue to be discussed with GCSP under the terms of the Memorandum of Understanding, but they are formally highlighted within these representations to confirm Marshall's position. The matters are listed below and addressed in turn thereafter:
- General quantum of development
  - Specific uses
  - Gypsy and Traveller pitches

- Concept plan
- Heritage
- Green Corridor
- Site delivery and phasing
- Transport

## General quantum of development

- 3.6 Whilst there is no masterplan for the site and substantial further work is required in order to determine the most suitable approach to development at Cambridge East, Marshall and its consultant team has undertaken some capacity testing exercises in order to understand what scale of development could be accommodated. Marshall has engaged with GCSP about the site's potential capacity for a number of years and has previously submitted a suite of documents and technical evidence which tested a range of capacity scenarios (December 2020 and July 2021). During this process, GCSP identified the site in the Local Plan 'First Proposals' document for 7,000 homes and 9,000 jobs. Discussions continued thereafter and Marshall and its consultant team maintain that the evidence and assessment work that has been undertaken demonstrates that the site is capable of accommodating a greater scale of development.
- 3.7 Policy S/CE as currently drafted indicates that the site is capable of accommodating "approximately 8,000 dwellings". The evidence provided to GCSP demonstrates that the site has greater capacity, with or without the addition of the expansion land.
- 3.8 In addition, confirmation of the new station to be delivered at Cambridge East as part of East West Rail's Development Consent Order application creates an opportunity in placemaking and sustainability terms to shift or extend any higher density centre so that it maximises the opportunities presented by a station, particularly for commercial uses. The station would also provide significant benefits for the development in transport terms and would enable a greater level of trips to the site to be supported. The ability to support greater levels of in / out commuting would suggest that a greater capacity of commercial floorspace could be accommodated at densities that reflect and optimise proximity to the station and maximise the benefit of the infrastructure.
- 3.9 The NPPF – both the current version and the consultation version – make clear that substantial weight should be given to making effective use of brownfield land and that planning policies should ensure that developments make optimal use of the potential of sites in order to meet as much housing need as possible. For sites in city / town centres or well-served by public transport, paragraph 130 of the NPPF states that a significant uplift in the average density of residential development should be sought, unless it can be shown that there are strong reasons why this would be inappropriate. The figure of 8,000 homes should be stated as a minimum, rather than an approximate estimate.
- 3.10 In relation to employment uses, the draft policy supports "*significant employment floorspace*" and its suitability for "*commercial space, including research and development, to foster economic opportunity, collaboration, and innovation*". Whilst Marshall agrees that it would not be appropriate to specify a jobs or floorspace number at this stage, the text understates the

scale and importance of the economic opportunity. Cambridge East has the potential to attract world class economic development and to take its place alongside the primary employment centres in the city.

## Specific Uses

- 3.11 Marshall strongly supports that the policy requires the delivery of a truly mixed-use development and shares the same objective to create a well-connected mixed-use district that brings together cultural and commercial space, including research and development, with a wide range of residential tenures, types and sizes to foster economic opportunity, collaboration and innovation. Marshall recognises that the size and capacity of the site provide a unique opportunity to deliver uses, services and facilities that address needs identified in the Greater Cambridge area that may not otherwise be able to be accommodated.
- 3.12 As currently drafted, the policy starts to define what some of these uses might be – for example, at paragraph 4(c) reference is made to faith facilities and civic uses such as a conference centre, concert hall, arts centre and leisure facilities. Marshall does not dispute that these types of facilities may be provided as part of the masterplan and planning application when these come to be prepared; however, the need for these types of facilities has not yet been fully explored and it may be determined that these are not appropriate uses for the site, or that alternative uses are more desirable. It is acknowledged that the policy does not preclude other uses coming forward and does not stipulate that these specific uses must be delivered. However, in the interests of clarity for anyone reading and understanding the policy, Marshall considers that these specific uses should not be listed ahead of a masterplan being developed and that the policy should recognise instead that the development will be truly mixed-use and will deliver community, cultural, leisure and commercial services and facilities.
- 3.13 The same principle may be applied to other stipulations within the policy. For example, paragraph 4(a)(ii) of the draft policy requires that 10% of the proposed dwellings on the site are to be delivered as specialist accommodation, particularly for older people or those with disabilities. However, there are a number of things to consider – firstly, the site is not due to become fully vacant until 2029 and then beyond that, the build out period for a scheme of this scale and significance is likely to extend at least 20 years. On that basis, it cannot be determined to this level of detail at this stage that 10% of the scheme is the appropriate target for the provision of older persons housing. Secondly, the recent confirmation of the new station at Cambridge East, plus Government’s commitment for growth at Cambridge, means this site is likely to be considered suitable for a greater capacity of development. A blanket percentage applied to the site that does not take account of total numbers is not appropriate. Given the scale of the site, Marshall requests that the policy allows for flexibility by removing the percentage to accommodate for demographic change, market demand and the placemaking considerations of different housing tenure types. The policy could be reworded to confirm that specialist accommodation should be provided as part of the development taking account of needs at the time identified in the latest Strategic Housing Market Assessment (or other similar assessment).
- 3.14 The same justifications apply when considering the 20,000sqm of B2 / B8 floorspace required in the draft text. Marshall acknowledges that the evidence base identifies a requirement for the delivery of B2 / B8 floorspace across Greater Cambridge and is committed to exploring how a range of employment floorspace can be accommodated as part of any future masterplan.

However, given the potential construction timeline for the development, it is likely that the demand for this type of floorspace may have changed (upwards or downwards) before or during the delivery of the scheme and as drafted, the policy does not accommodate for this. If it is considered necessary to include a minimum floorspace for B2 / B8 floorspace, Marshall requests that additional wording is added to account for any changes in demand, e.g. “unless up-to-date evidence of need for industrial land suggests otherwise.”

## Gypsy and Traveller Pitches

3.15 Marshall objects strongly to the inclusion within Policy S/CE of the requirement for two sites of 12 pitches for Gypsies and Travellers and to Policy H/GT, which assumes the incorporation of sites for Gypsies and Travellers within strategic sites. The proposals are fundamentally flawed in principle, because:

- the local authority’s evidence base does not support the need for additional allocations of gypsy and traveller pitches; and
- there is no discussion within any of the evidence base documents or any committee report as to why it is considered appropriate that it is the local plan Strategic Sites which are the appropriate location for new Gypsy and Traveller pitches. It is not apparent that there has been any assessment of the implications or that members’ attention has been drawn to the obvious disadvantages of using scarce Strategic Sites for Gypsy and Traveller accommodation.

3.16 The Accommodation Needs Assessment of Gypsies, Travellers, etc study undertaken by the specialist consultancy ARC, 2024 does not conclude or recommend the allocation of additional pitches. Having assessed the extent of existing Gypsy and Traveller accommodation and forecast the requirement for pitches, the assessment sets out a six-step hierarchy for meeting the requirement of which allocating new sites is the last step, i.e. only necessary if supply cannot be met through the other five steps. In summary, those steps are to examine and optimise the potential to increase supply from:

- turnover on existing sites;
- regularising sites that are not permanently authorised;
- additional pitch provision through intensification or expanding existing sites;
- making pitches on existing sites available for occupancy by gypsies and travellers;
- sites becoming vacant through household dissolution;
- and only then identifying new sites.

3.17 ARC advised (paragraph 11.5) that turnover, regularisation and intensification have the potential to meet the minimum short-term need, whilst further work is recommended to review the potential for additional pitch development on existing sites and to regularise the extent of occupancy or permanent pitches, which are not taken up by Gypsies and Travellers. The recommendation is not the allocation of new sites, but the development of a criteria-based policy to inform future planning applications (paragraph 11.7 and 11.9).

3.18 The need in Cambridge is reported as “zero”.

- 3.19 The ARC work was reported to the South Cambridgeshire Cabinet on 3 December 2024, with an officer report which recommended a number of actions, including the use of enforcement powers against the unauthorised use of Gypsy and Traveller sites for other purposes. Without explanation, however the Action Plan in Appendix B of the Committee Report recommended *“local plan to include provision of Gypsy and Traveller sites in new strategic sites.”* There was no analysis or justification for that recommendation.
- 3.20 The ARC report was updated in 2025 to reflect the extension of the local plan period. The basic analysis, however, was unchanged, although the annualised shortfall of accommodated was reduced from 7.2 pitches per annum to 6.85 pitches per annum. Both assessments recognise the potential to meet supply requirements through the turnover of pitches, the intensification of sites and proactive enforcement action by the local authorities to ensure that Gypsy and Traveller sites are used for their intended purposes.
- 3.21 Notwithstanding the lack of a need case for pitches, the policy and the requirement to use Cambridge East for Gypsy and Traveller provision is completely inappropriate for reasons of design, density, amenity and the economic use of land.
- 3.22 On behalf of Marshall, Allies & Morrison have undertaken a high-level assessment of the likely impact of delivering 24 permanent integrated Gypsy and Traveller pitches on 2 hectares of land. This indicates that the associated loss of residential development capacity would be in the order of 80 to 200 dwellings, depending on the location and configuration of the sites. This range reflects the assumption that the draft policy requires the provision of two separate sites. The loss of so many homes cannot be a sensible policy outcome.
- 3.23 There are also severe practical and deliverability challenges in identifying two discrete and suitable parcels of land within a new urban quarter. These include securing appropriate access and achieving compatibility with surrounding land uses. These issues are likely to be particularly acute here, as any realistic sites are likely not only to disrupt the achievement of a cohesive masterplan for Cambridge East but, in order to attempt to limit impact, to be located adjacent to existing residential neighbourhoods – such as Barnwell, Marleigh, Teversham, Springstead Village, Cherry Hinton, or Romsey.
- 3.24 Overall, the evidence base does not support the need for further pitches – particularly at the expense of optimising the development of a new urban quarter at Cambridge East.
- 3.25 Against this background, the inclusion of Gypsy and Traveller pitch provision in draft Policy S/CE and draft Policy H/GT cannot be regarded as sound and should be withdrawn.

## Concept Plan

- 3.26 GCSP will be aware that, through the course of discussions, Marshall has sought for any concept plan not to be included as part of the policy as there was concern that it would begin to predetermine the masterplan and location of uses. Whilst it is still considered unnecessary to include a concept plan at this stage and it is Marshall’s preference that this is excluded, Marshall is broadly content with the level of detail that is shown. However, Marshall still wishes to highlight that the concept plan is not representative of a masterplan for the site and so it should not be assumed that features on the concept plan are fixed, i.e. the green corridor

boundaries, the location of the district and local centres, or the alignment of the public transport route.

- 3.27 Notwithstanding that in principle position, there are still some matters that Marshall wishes to highlight.
- 3.28 The principal comment relates to the red line, which as drawn currently encompasses both Springstead Village and Marleigh as well as the safeguarded Airport land. By having the red line wrapped round all three sites, it becomes less clear that the wording within the policy (with the exception of the text at the end) relates purely to the safeguarded site, i.e. there is an important lack of clarity regarding whether the 8,000 homes is inclusive or (as Marshall and GCSP know it to be) exclusive of the schemes already consented. For the avoidance of doubt, the concept plan and policy wording should be clear what is already consented and what it proposed.
- 3.29 The red line should also be adjusted to include the green corridor. Whilst this is Green Belt and it can be retained as such through the key, the green corridor forms an integral part of the development and will be subject to master planning and works as part of the overall allocation. For example, the policy requires the green corridor to be multifunctional, the concept plan suggest active travel routes are required to cross through the corridor to connect the northern and southern parts of the site and the supporting wording to the policy recognises that it is not necessary or expected that the Green Belt corridor will be uniform width. As currently drawn the concept plan red line boundary wrongly suggests that the Green Belt corridor is excluded from the allocation and will be retained as the uniform 300m width shown.

## Heritage

- 3.30 The Cambridge East policy wording states that heritage assets should be celebrated and specifically references the 'terminal building', boundary walls and Hangar 1 as key buildings in the new city district. In fact, the reference should be to the listed Control and office building. Marshall acknowledges that the Control and office building has statutory protection as a Grade II listed building and should be retained and protected as part of any future masterplan. It has also recognised that the proximity, nature and design of any built form surrounding the retained Control and office building would need to be carefully considered in order to respect its setting. There are a number of possible ways that this could be achieved, however, and Marshall acknowledges that the policy wording, as drafted, allows for that relationship of built form to be explored through the master planning process. Marshall does not consider that any other buildings meet listing criteria.
- 3.31 In relation to the retention of Hangar 1, the draft policy promotes more definitive constraint which Marshall considers to be a level of detail not appropriate for the plan but a matter to be worked through as part of the design development process.
- 3.32 Marshall shares an aspiration to respect the setting of the listed building and to ensure the site's legacy is apparent in its development but suggests that policy wording would be more appropriate if it called for that debate to be addressed in master planning the site rather than apparently being pre-determined in the Regulation 18 plan.

3.33 In terms of the setting of Teversham, capacity testing and concept plan exercises have consistently acknowledged the requirement to ensure that there is a buffer of no development within a certain distance of Teversham. The widened end of the green corridor to the east of the site will be designed to protect the setting of the Conservation Area and seek to maintain the sense of separation. However, notwithstanding that a buffer will be provided, Marshall considers that the draft wording should be reviewed to recognise the reality that, whilst the separate character of Teversham must be respected, development at Cambridge East will be visible from the village.

## Green Corridor

3.34 The Cambridge East policy itself does not mention compensatory widening where it is proposed to narrow the green corridor. The supporting text and the Site Allocations Topic Paper reference, however, that *“there may be a requirement for compensatory widening”*.

3.35 The supporting text to the policy recognises *“it is not considered appropriate for the corridor to take that form”* – which is a reference to the 300m uniform width of the green corridor, as currently shown on the concept plan. As referenced in the supporting text, the boundaries of the Green Belt corridor are expected to be an output of a master planning exercise, which is yet to be undertaken. This approach is carried across from and is consistent with the adopted Cambridge East Area Action Plan (2008) which similarly enabled the green corridor to be *“significantly narrower only where particular justification is provided and the green corridor function is not inhibited”*.

3.36 The specific reference to compensatory widening is not appropriate or necessary and, as drafted in the supporting text, is misleading to the reader that this can be expected in response to instances where the green corridor is narrowed. Compensatory widening is not of value in its own right and could only have the effect of sterilising important development land. If the shape of the corridor is truly to be determined through a master planning exercise, it cannot be known whether any narrowing requires compensatory widening. If it can be demonstrated that the shape of the corridor meets the specifications for good placemaking as set out in the policy wording, then that is the answer. Compensatory widening references should be removed to ensure the policy is compliant with national policy.

3.37 Marshall also wishes to question whether it is appropriate that the Green Corridor is designated as Green Belt. As drawn, it does not have coherent boundaries or appear to meet any of the NPPF Green Belt purposes. It is, in effect, a placeholder for the design and retention of a Green Corridor as part of the development of Cambridge East.

3.38 Marshall fully supports the principle of the Green Corridor which will be planned as an integral part of the Cambridge East development and protected as such both by appropriate plan policies and the terms of any planning consent. However, that does not make the corridor Green Belt – the designation may be inappropriate and cumbersome. As drafted, the corridor would remain in the Green Belt until the new local plan is reviewed, even after planning consent will have been granted for its modulation and partial development. That would be confusing to the public and unnecessarily awkward in planning terms. Dealing with its status could generate perverse planning outcomes - it could delay the delivery of the development and/or encourage poor placemaking to avoid planning risk. The allocation of the land for a master planned development represents the exceptional circumstances necessary to remove its Green Belt

status. Retaining the GB designation is inappropriately restrictive given that GCSP recognise that the corridor, as drawn, would not be an acceptable outcome. The green corridor can be secured in policy without a Green Belt designation.

## Site Delivery and Phasing

- 3.39 Marshall supports the intention that a design-led process will determine the overall capacity of the site and the final mix of uses. Marshall agrees that to cap and fix these elements at this stage would be premature and could limit the opportunity to explore and identify the optimum solution for the site. For the purposes of this draft policy, the wording seems appropriate, but Marshall would welcome the opportunity to explore further what parameter plans would be required and the level of detail that these are expected to contain.
- 3.40 Unlike the adopted AAP policy for Cambridge East, it is noticeable that the draft site delivery and phasing policy wording does not make reference to viability and the unique circumstances that exist on the site. Wording was previously included in the adopted AAP relating to the provision of affordable housing and the particular circumstances that this site faces in terms of achieving vacant possession ahead of development (and recognition that the costs of relocation, demolition and remediation would be allowable costs for viability purposes). On the basis that these circumstances have not changed in principle since that adopted policy was written, Marshall's position is that they would wish to see this wording carried forward from the AAP. Officers will be aware that the wording was tested through the determination of the Marleigh outline planning application and withstood scrutiny on a real-world project. The principles of that policy approach remain sound.
- 3.41 Marshall considers it important that the reader has clarity on the viability considerations that should apply here, and that these are different from a vacant greenfield site. Consequently, it is suggested that the following wording is carried forward from the AAP:

*“The starting point for negotiations concerning the provision of affordable housing at Cambridge East will be 40% or more of the dwellings for which planning permission may be given on all sites. However, this major and complex development which has a wide variety of requirements covering infrastructure and services, and a balance must be struck between competing requirements, in the light of economic viability. The occupation of affordable housing will be limited to people in housing need. It must be available over the long term.*

*The proportion and type of affordable housing will be the subject of negotiation with applicants. The appropriate level of contributions sought from the development will take into account costs which fall to the development, including the relocation of the airport and associated activities (including site remediation).”*

## Transport

### Overview

- 3.42 The Cambridge East site is included as a new strategic mixed-use allocation in the Greater Cambridge Local Plan and is proposed to accommodate approximately 8,000 dwellings and a significant amount of employment floorspace to be defined through masterplanning (although for the purposes of the transport evidence, 145,000 sqm employment by full build out is

assumed). The redevelopment of a site of this scale will require a site-specific transport strategy including numerous walking, cycling and public transport investments delivered directly by the development, and supported by additional transport schemes implemented by external providers such as the GCP.

- 3.43 From a transport perspective, Policy S/CE: Cambridge East, proposes an innovative and sustainable transport framework that prioritises low-car living and active travel. It outlines a forward-thinking movement strategy for the site, aiming to deliver walkable neighbourhoods with effective wayfinding, high-quality public transport routes and key mobility hubs. It proposes that all development is designed to be within walking distance of mobility hubs, encouraging seamless access to the rail network, the city centre, west Cambridge, and the Cambridge Biomedical Campus. Internal streets are configured as low-traffic neighbourhoods, with vehicle access limited to major roads and a focus on minimal parking, supported by shared car storage such as car barns, to encourage sustainable transport choices from day one.
- 3.44 Marshall is broadly supportive of this policy framework in relation to transport as it reflects its own ambitions and complements the transport strategies that have been developed as part of the promotion of the site. However, despite this support, there are a number of matters Marshall wishes to highlight regarding what is believed to be missing from the Policy or supporting text at present, and some further additional recommendations to support its soundness.

### **Greater Cambridge Transport Strategy**

- 3.45 Following the abandonment of Making Connections in September 2023, the Draft Local Plan awaits an updated Greater Cambridge Transport Strategy (GCTS) which is programmed for publication and adoption later this year. Whilst the criticality of the GCTS is clear for the Plan, Marshall wishes to highlight that even when the GCTS is published, it is likely that some longer-term infrastructure uncertainty (funding, design, timing) will continue to exist. Despite inevitable uncertainty in some matters, changes to national policy mean that this uncertainty can be managed and should not serve as a hinderance to Cambridge East moving forward. The changes relate to the updated NPPF which now embraces vision-led transport planning within which a Monitor and Manage (M&M) Framework can provide the controls on delivery. This, coupled with significant positive local authority experience in applying M&M, can provide confidence that a robust and defensible planning approvals pathway can be navigated.
- 3.46 In this context, Cambridge East remains well placed as a foundation of the Local Plan and with the further benefit that a substantial first phase of development can be relied upon prior to any dependency on investments outside the control of Marshall and its Development Partner. This first phase confidence relates to the operational airport and the extant vehicle trip generation associated with it which provides an existing trip 'envelope' or budget which can accommodate an appropriate number of jobs and homes before net additional impact on the transport networks would be experienced.
- 3.47 Beyond a substantial first phase, strategic transport investments will likely be required but are already well developed by external bodies including the GCP who propose a busway through the site and a proposed new East Cambridge railway station on Coldhams Lane, which is being promoted as part of East West Rail. Further measures which are yet to be announced as part of the emerging Greater Cambridge Transport Strategy (GCTS) and by the Cambridge Growth Company (CGC) may reflect previous proposals from Marshall for strategic connectivity from

the site, including an expanded public transport network or Mass Transit BRT system. These are not just site 'mitigations' but city and sub regional connections, for which Cambridge East is both a contributor and facilitator. Marshall encourages these options to be taken into account when considering the proposed allocation quantum at Cambridge East, recognising that although uncertainty is inevitable at this stage, uncertainty should not undermine the value and importance of the land to enable sustainable spatial strategies.

Accordingly, the draft policy should be extended to recognise that:

*“ .... A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery. Monitor and Manage as part of a transport strategy should also be utilised to manage infrastructure timing and uncertainty.”*

### **Trip Budget**

- 3.48 The draft Local Plan states that delivery of the proposed capacity and mix of development at Cambridge East is reliant on the successful implementation of a vehicular trip budget. At present, Policy S/CE states that an indicative vehicular trip budget of 1,500 trips in the AM peak and 1,800 trips in the PM peak is required, with corresponding target vehicular mode shares of 18% in the AM peak and 22% in the PM peak in 2045.
- 3.49 Marshall has always supported Cambridgeshire County Council (CCC) in the principle of the Trip Budget approach as a means to secure sustainable development and avoid severe impacts on the highway network. However, it is not appropriate or necessary for the policy to state exact numbers. That level of detail is not appropriate for a policy and, in any event, any numbers must be indicative and will be subject to further modelling at all stages of the planning and delivery process. Marshall is concerned that pre-determining the trip budget (without sufficient rigour in the analysis) risks arbitrarily limiting the delivery potential of the scheme and could ultimately hamper both housing delivery and economic growth. Marshall supports the principle of an evidence driven approach to deriving a trip budget but is clear that this does not need to be prescribed by the policy.
- 3.50 It is also considered to be appropriate that the Policy recognises that the extant trip making from the site can be used to support a first phase of development.

### **Employment Floorspace**

- 3.51 The Greater Cambridge Local Plan supporting documents for Cambridge East, and in particular the WSP Transport Mitigation Measures paper (September 2025), sets out that Cambridge East is assumed to be approximately 8,000 dwellings and 145,000m<sup>2</sup> of employment by full build out (residential-led mixed-use). The Policy does not specify the exact quantum of employment floorspace which is referenced in these other supporting documents.
- 3.52 Taking the 145,000 m<sup>2</sup> and applying a locally accepted employee density for Life Science / Lab metrics of 1 employee per 28sqm, this employment floorspace would only support c.5,179 jobs. This level of job creation is much lower than the number of jobs tested through the previous transport work for the site, which accommodated in the region of 9,000 jobs (which did not account for the new Cambridge East station or the potential uplift in capacity that this would support).

3.53 As noted, the Policy does not specify an exact floorspace quantum and this is therefore supported, but Marshall would encourage further addenda to the supporting documents to be consistent with the Policy to avoid confusion.

### **East West Rail**

3.54 The East West Rail proposal for an extension of their project to include a twin track turn back at Cherry Hinton along with a new Cambridge East Railway Station is considered by all parties to be a truly exciting opportunity for the city. EWR have recently announced that the station is now part of the main scope of their project rather than something to be 'scoped in'. Marshall is pleased to have helped support this opportunity to date. Marshall acknowledges that 3<sup>rd</sup> party funding will be required to fund the station and commits to working with EWR and the local transport partners in developing the funding statement required for the Development Consent Order (DCO) Inquiry.

3.55 To date, no Local Plan modelling has been conducted to demonstrate the additionality that a new rail station at Cambridge East could bring above the core policy. Marshall therefore welcomes further modelling and consideration of the additional quantum of development that could be unlocked if a Cambridge East station were to come forward.

3.56 Marshall also welcomes the announcement by EWR that Central Cambridge station will benefit from a new eastern entrance and gate line. Marshall has previously made representations to EWR in this regard and shown how Davy Road could support connectivity on the east of the city. Whilst beneficial to Cambridge as a whole, the eastern access to Central Cambridge complements the importance and benefit of a new station at Cambridge East, which would have a similar catalytic effect for investment as Cambridge South station at the Cambridge Biomedical Campus.

3.57 Marshall is pleased that the new station at Cambridge East is not referenced within the supporting information for Policy S/CE as being a mitigation for the allocation, but rather an additional opportunity for the site which would '*alter the local context*' and '*could therefore result in a change of scale and layout of development at Cambridge East to that outlined...*'. However, given that the Station now has the same status as a station at Cambourne upon which a new community is being planned as part of the Local Plan, Marshall considers that the Policy should sensitively reflect the opportunity.

### **CapCAM Modelling**

3.58 Marshall understands that GCSP and CCC will be re-testing the proposed allocation using the new CapCAM strategic model and therefore urges early visibility of the CapCAM outputs so that any differences to the previously derived conclusions can be considered. Marshall is also keen to provide input to the updated CapCAM modelling for Cambridge East to ensure that the outputs best reflect the intended masterplan for the site with regards to vehicular loading points and the internal site layout.

3.59 Further to this, Marshall urges the updated CapCAM model runs to also explore development quantum in excess of the currently proposed allocation. Previous CSRM model runs commissioned by Marshall included development scenarios up to 12,800 homes and 20,000 jobs with varying public transport enhancements. Marshall therefore encourages the new CapCAM model runs to consider the upper limit of development that could be possible at the

Cambridge East site (including development of the expansion land), taking into account the replacement scheme for Making Connections, the provision of a Cambridge East rail station, and updates to any supplementary transport schemes such as the proposed relocation of the Newmarket Road Park and Ride site and its relational connectivity to Cambridge East.

### **Summary**

- 3.60 Overall, Marshall strongly supports the Cambridge East policy direction in relation to transport and acknowledges the breadth of transport work already conducted which supports the proposed allocation. Whilst it is understood that further CapCAM model runs will be conducted to support the ongoing Local Plan process, Marshall would encourage that these take into account the updated context of Cambridge East with regards to the increased likelihood of a railway station to the immediate south of the site and the possible enhanced site capacity.
- 3.61 Marshall is keen to continue to contribute positively to the Local Plan process and hope that there is further opportunity to discuss and input into the specifications for such model runs in due course.

## 4 Homes

---

- 4.1 Policies in the 'Homes' chapter of the Local Plan will be important in influencing the mix, tenure and size of homes expected to be provided within major developments (beyond the specifics outlined in the Cambridge East policy). In particular, the requirements of Policies H/AH (Affordable housing), H/CB (Self and Custom Build homes) and H/GT (Gypsy and Traveller pitches and Travelling Showpeople plots) could potentially have significant impacts for development at Cambridge East, particularly when considered together.
- 4.2 The development of Cambridge East provides a significant opportunity to tackle the capacity and affordability crisis that exists within Cambridge through accommodating a wide range of homes, of different sizes and tenures. A site of the size, scale and unique nature of Cambridge East comes with a lead-in time and an extensive delivery period. This requires some flexibility to be applied in order to ensure that the mix of housing that is eventually delivered on site is responsive to latest market advice and a reflection of housing needs at the time. This section considers the potential implications of the current wording of the housing policies.

### Policy H/AH (Affordable housing)

- 4.3 The new draft affordable housing policy retains the same requirement for 40% affordable housing as was proposed in the 'First Proposals'. Marshall continues to support this element of the policy and, subject to viability, intends to deliver a policy compliant scheme in relation to the 40% that offers wide ranging housing benefits, including to those in greatest housing need.
- 4.4 However, since the 'First Proposals', the affordable housing policy has been developed and now includes more stringent requirements in terms of the specific split of affordable housing tenures that will be sought from developments over 15 dwellings. The policy stipulates that schemes over 15 dwellings must provide 65% affordable rent homes, 10% social rent homes and 25% shared ownership homes, or other affordable homes providing a route to home ownership.
- 4.5 Whilst the draft policies reflect GCSP's view of city-wide issues, they are not necessarily right for every site. For Cambridge East, at this stage there is no masterplan for the site and consequently the specific details of the most appropriate affordable housing mix have not been tested. The scale of Cambridge East also means that any requirements need to retain an element of flexibility so that they can remain appropriate over the lifetime of the development.
- 4.6 As currently drafted, there is no wording within the policy that would allow a departure from the specified mix where it can be evidenced and justified that an alternative mix would be more appropriate. Amendments to tenure mix are commonplace on strategic sites, with Marleigh and Waterbeach being two examples where this has occurred. Marshall anticipates that a bespoke Site Wide housing Strategy would be submitted with a planning application for the site and that this would provide a more appropriate vehicle for determining the right housing mix at Cambridge East.

### **Policy H/CB (Self and Custom Build homes)**

- 4.7 Similar considerations apply to this policy. The draft policy asserts that schemes of 20+ dwellings must provide at least 5% of the new homes as serviced plots for custom and self-build homes.
- 4.8 For a scheme of 8,000+ dwellings, it is likely to be impractical and result in the wrong design and density outcome if the scheme were required to integrate upwards of 400 self-build / custom plots. It also cannot be determined at this early stage that there is sufficient demand locally for upwards of 400 self-build / custom homes at Cambridge East.
- 4.9 On that basis, Marshall wishes to see the policy amended so that it provides developers with an opportunity to provide a lower proportion of self and custom build where it can be evidenced that there is not sufficient demand for this type of dwelling and / or it would not be conducive in terms of placemaking to provide this proportion of self and custom build homes.

### **Policy H/GT (Gypsy and Traveller pitches and Travelling Showpeople plots)**

- 4.10 Please refer to Section 3 for Marshall's response to this draft policy.

## 5 Jobs

---

- 5.1 There are a number of policies listed under the jobs category, but these largely relate to new employment development proposals (that don't form part of the strategic allocations), the rural economy, or the protection / development of existing business spaces. Policies do not limit the scale of employment development at Cambridge East and Marshall strongly welcomes this approach.
- 5.2 Marshall's vision for Cambridge East strongly aligns with the draft 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 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 a legacy of employment opportunities at all levels across a range of uses.
- 5.3 Marshall has a long history of investing in skills. It is intended that Cambridge East will build on the established and respected Marshall Apprenticeships by providing a wealth of skills, education and lifelong 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.
- 5.4 The principal policy of note for proposals at Cambridge East relates to affordable workspace and creative industries – Policy J/AW (Affordable workspace and creative industries). The policy advises that it is yet to be finalised and the supporting text confirms that GCSP are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to the total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. However, it is acknowledged by GCSP in the supporting text that in other areas, proposals are typically required to deliver 10-20% of total NIA floorspace as affordable rentable floorspace, either over a fixed period of time or in perpetuity.
- 5.5 Without specific detail of what the requirements for affordable workspace are and when it will be applied, it is difficult to comment regarding the feasibility of being able to deliver a specific proportion of affordable workspace at Cambridge East. However, Marshall is fully supportive of the policy intent, and it is 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 at Cambridge East. Marshall reserves its position to consider the full implications of a specific proportion of the employment floorspace being affordable, should a figure be included at Reg 19 stage.
- 5.6 Marshall encourages GCSP to ensure that this policy includes sufficient flexibility for different affordable employment opportunities to be brought forward. As an example, an incubator hub might be a sensible early development at Cambridge East and it might have naturally discounted rental rates. Marshall urges that such a bespoke solution can be appropriate, even if it does not meet the precise terms of the policy. The scale of development at Cambridge East provides a unique opportunity to deliver bespoke employment solutions and so Marshall would encourage that this policy provides sufficient flexibility and does not preclude this opportunity.

## 6 Skyline and Tall Buildings

---

- 6.1 The Topic Paper 5: Great Places contains a tension between design-led policies of a 'proportionate and flexible approach' defined by broad and meaningful criteria, and a more restrictive approach defined by matters of 'protection' and 'respect' through which development must relate to the existing character and setting of Cambridge. While this tension could be resolved through the design-led development of a planning application for Cambridge East, the restrictive aspect of the Topic Paper has been translated into draft policy, guidance and the evidence base of the draft Local Plan, which restricts the general flexibility of design-led policies and does not place sufficient importance on strategic sites such as Cambridge East.
- 6.2 Marshall is broadly supportive of Policy GP/ST (Skyline and Tall Buildings). It adjusts Policy 60 of the CCC Local Plan (2018) to make reference to updated guidance and a new evidence base, setting out adjusted criteria for a design-led assessment of tall building impacts. While Marshall agrees with the incorporation of suicide prevention into policy and considers the specific reference to design quality is sensible, adjustments within Policy GP/ST are generally more restrictive than those of Policy 60, introducing a fundamental change through a plan-led approach to heights. To maintain a higher degree of flexibility, heights should be considered as part of a design-led approach, and the section in brackets within paragraph 1 of the policy ('as defined by the local context heights in Appendix H: Skyline and tall buildings guidance') should revert to a paragraph more similar to the CCC Local Plan as 'further advice on tall buildings'.

### Cambridge Skyline and Tall Building Strategy

- 6.3 The plan-led approach is established through a high-level study of Cambridge, set out within the Cambridge Skyline and Tall Building Strategy (2025). In general, the study is robust and well considered, it sets out standard and reasonable guidance on the development of tall buildings. However, its analysis of Cambridge East and approach to sites of intensification on the edge of Cambridge is a cause of concern for the future development of the city.
- 6.4 Marshall had hoped to see a clear strategy for growth of Cambridge as a poly-centric city, with the historic centre protected and the planned opportunity taken to create new urban quarters through height and density – to limit pressure on the centre and on the Green Belt. The townscape and landscape policies would be more coherent if they responded to such a strategic approach.
- 6.5 While the Skyline and Tall Building Strategy sets out a high-level analysis of townscape, landscape, heritage, and visual sensitivity relating to the setting of Cambridge, its principal concern is in the definition of future heights through the analysis of existing 'contextual heights'. Its methodology provides a broad understanding of urban form; however, it cannot replace closer study of individual sites or replace the closer scrutiny of a design-led approach.
- 6.6 For Cambridge East, the analysis of contextual heights does not take into account the existing character of the Cambridge Airport related to the visual impact of its hangars and the nature of its airport function. In terms of urban form, the analysis has limited capacity to account for exceptional structures like the hangars of Cambridge Airport or the open spaces at the

periphery of the city. Further, the surrounding emerging context is fundamental in understanding potential future heights with emerging consented and emerging developments to the north and south of the site. While these have been referenced, they not been taken into account in the definition of contextual heights at Cambridge East.

- 6.7 The area studies set out within the Strategy provide a means of correcting these methodological issues: testing the high-level nature of the context heights analysis. While Marshall supports some aspects of the area study for Cambridge East, the study includes a large area to the north of Newmarket Road, which is already subject to existing consent and recent development, but omits the southern portion of the site to the south of the green corridor, which should be inseparable from the northern portion.
- 6.8 In addition to these shortcomings, the Strategy and its appendices provide a less valid approach to the assessment of tall buildings. It is a purely theoretical study, highlighting strategic views and mislocating the site in relation to the core. The rudimentary nature of the analysis within the study should be developed further as part of the master planning process.
- 6.9 Marshall agrees in principle with the initial conclusions of the Cambridge Skyline and Tall Building Strategy assessment (Appendix D) in relation to the area of search that includes Cambridge East, that buildings of 19m upon the site would have minimal impact, and suggests that this analysis should be expanded to the southern portion of the site. In this area, a drop off in topography and general encirclement of tree cover, low-quality townscape, and emerging developments reduce its sensitivity to the development of tall buildings.
- 6.10 The definition of a 32m cap to development based upon analysis of a singular mass is invalid; potential distant interactions of tall buildings with the historic core should not generally preclude their development; and the definition of landscape buffers should not form part of the analysis of tall buildings.
- 6.11 In general, the methodological framework of the Tall Building Study for urban extensions and its prescriptions for Cambridge East should be set aside in favour of a sufficiently detailed design-led approach with recognition that in 'large growth areas with significant intensification potential the Urban Height Zone [tall building threshold] is promoted.'

## **Appendix H (Skyline and tall buildings guidance)**

- 6.12 Appendix H (Skyline and tall buildings guidance) is referenced within Policy GP/ST. This section of the draft Local Plan provides a convoluted expansion of Appendix F of the CCC Local Plan, it does not reflect the positive approach of Policy GP/ST and would benefit from revision to place greater emphasis on the exceptional nature of sites suitable and planned for urban intensification. Marshall considers it appropriate that this emphasis should be more specific to Cambridge East as an important planned urban centre, and with potential impacts of a future station to be taken into consideration, an appropriate location for a cluster of tall buildings. Marshall does not understand, for example, why Cambridge East is not listed as a location likely to support a cluster of tall or taller buildings, when other growth areas such as the Science Park and the Genome Campus are listed.
- 6.13 Marshall considers the Section 3 Objectives to be overly broad and conservative. They reflect a valid perception of central Cambridge but neglect the established character of its suburbs,

the strategy for growth or the impact of hangars at Cambridge Airport. While the preceding Section 2 Aims provide a broad and appropriately flexible framework, the additional detail of Section 3 Objectives are too concerned with preserving the current urban form of Cambridge and prevent transformative developments such as those envisaged for Cambridge East. If the objectives are retained, it is suggested that reference to a more positive approach to tall buildings is applied, effectively repurposing paragraph 12.5 as a more general objective than a single assessment criterion.

- 6.14 Views to the east of Cambridge are a key consideration in terms of development at Cambridge East, and the Skyline and Tall Buildings Strategy introduces a new Strategic View K from Little Wilbraham Road over the A14. It recognises that this is an illustrative view, providing a broad vista at the periphery of Cambridge. Relating to the setting of Cambridge, the view does not provide a strong image of the historic core and is to a great extent defined by hangars upon Cambridge East. The roadway lacks a footpath or cycleway and View K is only glimpsed from passing vehicles on a 60mph road. It is inappropriate to see this as a strategic view or to draw policy conclusions from it.
- 6.15 Change to this view is inevitable in the future development of the site. Visibility from the view should not be regarded as inherently harmful. Restricting the potentially positive aspect of this change and elevating this illustrative viewpoint position to the same status as that of Castle Mound or those to the west of the city runs counter to guidance and the general practice of visual impact assessment. If the view is to be recognised within the future Local Plan, it would be more sensibly placed within a broader category of long distance views towards Cambridge. This would establish Cambridge East correctly as a planned new urban quarter at the edge of Cambridge, in the distant background and at the periphery of views towards the historic core. As such, further analysis of potential positive effects of the removal of the hangars, new tree cover upon the site, and high quality urban development that responds to its context at the edge of the city should be established through the master planning process.
- 6.16 Marshall also considers it necessary to clarify the technical requirements for submission with regard to digital models and the nature of the general Cambridge context model. For example, it is not clear how digital models should ‘incorporate listed buildings conservation areas, key routes, rivers, open spaces, and urban grain’. Nor is there precision around the requirement of a ‘low-detail version if the main file is high-poly’, or how ‘potential impacts to heritage assets’ should be integrated within townscape and visual impact assessment.

## Implications of the Skyline and Tall Buildings Strategy

### South of the Green Corridor

- 6.17 The Skyline and Tall Buildings Strategy classifies the area of the site south of the Green Corridor as a “Suburban / Rural Height Zone”, limiting building heights to a maximum of 13 metres. This is highly restrictive, effectively limiting residential buildings to four storeys and commercial buildings to three storeys (excluding plant).
- 6.18 A proper justification for this blanket classification is missing, and the complete exclusion of the southern area from the Areas of Search is not clearly explained. Given its proximity to the proposed Cambridge East Station and its role within the masterplan, this must be addressed.

- 6.19 The restrictive approach appears to conflict with other policies that emphasise a design-led approach. Given the high-level nature of the evidence base, Marshall considers a rigid, rules-based approach inappropriate. Moreover, it is unlikely to produce flexible, high quality or positive outcomes and may instead constrain the potential for strategically important growth at Cambridge East.
- 6.20 This is particularly true for the southern part of the site, which presents an opportunity to create a new commercial district adjacent to the new Cambridge East station - a location well-suited for sustainable commercial development that could support higher-density, taller buildings.

### **North of the Green Corridor**

- 6.21 While the southern area is excluded from the Areas of Search, the area north of the Green Corridor is included and identified as a *“potential indicative location for clusters of tall buildings up to 32 metres”*.
- 6.22 For this area, the Skyline and Tall Buildings Strategy considers three height scenarios:
- Scenario A: Tall building threshold = max. 19m
  - Scenario B: Tall building threshold + 6.5m = max. 25.5m
  - Scenario C: Tall building threshold +13m = max. 32m
- 6.23 A height of 32 metres is identified as an absolute upper limit, with the scenarios applied to Cambridge East (north) rated green, amber, and red respectively. The concluding recommendation suggests that buildings up to 32 metres should be confined to *“carefully managed clusters”*, with *“the majority of taller buildings being well below this height”*.
- 6.24 The way in which these assessments of context heights are applied in practice needs to be clearer within the plan. If they are simply benchmarks above which design led assessments need to be undertaken, that may be sensible, but the plan must be careful to avoid predetermining acceptable heights from its partial evidence base.

### **Impact assessment**

- 6.25 On behalf of Marshall, Allies & Morrison and The Townscape Consultancy have carried out an initial assessment of the implications of the Skyline and Tall Buildings documents on development capacity at Cambridge East. This indicates that a literal application of the height recommendations as drafted could potentially result in the loss of substantial residential and employment floorspace from the true potential of the site.

## 7 Landscape and Open Space

---

- 7.1 Landscape and green infrastructure related policies of the draft Local Plan will be important in influencing the quantum, distribution and composition of green infrastructure and public open spaces within major developments.

### Policy BG/BG (Biodiversity and geodiversity)

- 7.2 In requiring a 20% net gain in biodiversity on major sites, the policy exceeds government policy. Government Guidance on BNG is clear that:

*“Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development.”*

- 7.3 The evidence set out in the Biodiversity and Green Spaces Topic Paper is unconvincing. Just because it may be possible to achieve 20% on certain sites does not mean that it should be imposed as a policy requirement. 10% is a clear and often stretching national benchmark. The characteristics of Cambridge do not justify a different approach.

### Policy BG/GI (Green and Blue infrastructure)

- 7.3 Early high-level stages of master planning for Cambridge East have been developed using a landscape-led approach, based on delivery of a strong green infrastructure framework with its broad network designed to lie within walkable distances of all future residents and employees on the site, whilst connecting to surrounding communities. Development at Cambridge East would comply with all requirements of this policy, particularly with regard to its requirements for green and blue infrastructure to be multifunctional, connected, sympathetically placed, resilient, responsibly managed and environmentally sensitive.
- 7.4 On behalf of Marshall, BMD has undertaken a high-level study and confirmed the potential for development at Cambridge East to achieve an Urban Greening Factor (UGF) score of 0.4, as required by this policy.
- 7.5 In which case, Marshall consider that the current draft of this policy is unlikely to impact on the ability to deliver development in accordance with Policy S/CE, so it can and should be supported, along with the open space standards set out in the ‘Greater Cambridge Green Infrastructure Strategy – Volume 1 – Emerging Strategy and Standards (2025)’ and the overall aims for green infrastructure enhancement outlined in the ‘Greater Cambridge Green Infrastructure Opportunity Baseline Report (2020)’.

### Policy BG/TC (Improving tree canopy cover and tree population)

- 7.6 This draft policy is stated to control how development impacts tree canopy cover, the tree population and protected trees and hedgerows. Beyond retention and protection of existing

trees and hedgerows (wherever possible), the policy requires major development proposals to “*demonstrate, via a Tree Canopy Cover Assessment, how it will achieve a **minimum future canopy cover of 30% on site.***” [our emphasis]

- 7.7 This requirement of draft Policy BG/TC is likely to have significant impacts on: the capacity for development at Cambridge East; the composition of its landscape; the nature of its open spaces and ecological habitats; and the character of this edge to Cambridge.
- 7.8 It is not made clear within the policy or any of the supporting evidence, whether tree canopy cover is calculated as future tree canopy only or a combination of trees with other landscape / green infrastructure features (e.g. hedgerows, scrub or structural shrub, green walls, green roofs etc).
- 7.9 The ‘Greater Cambridge Local Plan: Topic Paper 3: Biodiversity and Green Spaces’ confirms that the Cambridge Tree Canopy Cover Assessment Calculator is currently being developed, citing examples from other authorities (Colchester, Wycombe and Cornwall) being used to inform the new calculator. However, these examples vary with regard to the features and elements (beyond tree canopy) that can contribute to their respective policy requirements for canopy cover.
- 7.10 GCSP should confirm whether the 30% target is to comprise tree species alone or whether other specific landscape features / elements can contribute to the total canopy area.
- 7.11 The ‘Greater Cambridge Green Infrastructure Strategy – Volume 1 – Emerging Strategy & Standards (2025)’ states that “*The Cambridge Tree Strategy (2016) includes a target for achieving a 19% urban tree canopy cover by 2050 based on 17% baseline cover. There is no baseline tree canopy information, strategy or target for South Cambridgeshire currently available. In terms of national benchmarks, the Urban Forestry & woodland Advisory Committee (2017) recommended a target of at least 20% overall tree canopy cover for a local authority area, or where the target is already met the aim should be to increase tree canopy cover from the current baseline. In this context, the proposed uplift target of 20% by 2050 for the Greater Cambridge area as a whole is considered to be appropriate. The Woodland Trust recommends a minimum of 30% tree canopy cover target for new development land.*”
- 7.12 The document contains a link in the final sentence above, to the Woodland Trust ‘Emergency Tree Plan for the UK (2020)’, which contains a recommendation stating “*Every local authority should commit to a minimum 30% tree canopy cover target for new development land.*”
- 7.13 Whilst it is accepted that this is a bold aspirational recommendation, the report provides no evidence to support the suitability of the recommendation, implications of which will have varying impacts on a range of master planning considerations, including placemaking, biodiversity, community cohesion, landscape and townscape character, generation of a proportional range of land uses etc. In this context, it is considered that a blanket application of the recommendation is not realistic or appropriate.
- 7.14 On behalf of Marshall, BMD carried out an initial assessment of how 30% tree canopy coverage might be achieved across the site, making assumption about what could realistically be delivered within the structural green infrastructure as well as the development areas. This found that an additional 26 hectares of woodland with 100% canopy cover would be required,

on top of other open space provision including the Green Corridor, necessitating a corresponding reduction in development area and potentially resulting in the loss of up to 2,600 residential units.

- 7.15 The 'First Proposals Sustainability Appraisal' (as summarised in 'Topic Paper 3: Biodiversity and Green Spaces') stated that a *“high canopy cover requirement could mean that woodland would dominate a development site’s landscape and biodiversity provision, at the expense of a more biodiverse mix of habitats and landscapes.”* This is a substantial risk for Cambridge East.
- 7.16 GCSP’s objective of achieving 20% tree canopy cover across the city is more suited to the development of the Cambridge East site – albeit, given the assumptions set out above, even 20% cover would remain a challenging and aspirational target but has greater potential to be tested with careful, considerate landscape-led design alongside other Policy S/CE requirements.

## 8 Water

---

- 8.1 Marshall notes that there are two key policies relating to water efficiency and management that would be a consideration for any future planning application at Cambridge East should they be adopted – Policy CC/WE (Water efficiency in new developments) and Policy CC/IW (Integrated water management, sustainable drainage and water quality).
- 8.2 Marshall understands the environmental risks associated with the depletion of local groundwater resources in Greater Cambridge, particularly regarding the impact this is having on rare chalk streams. Marshall understands that this will be partly mitigated through the temporary Grafham Bulk Water Transfer Scheme after 2032, and the more permanent Fens Reservoir project after 2036. This is described in three recently adopted Water Resource Management Plans.
- 8.3 Marshall supports the objective to improving water efficiency in all new homes and reducing per capita consumption (PCC) towards 80 litres per person per day to further negate the depletion of local groundwater resources. However, it is noted that 80 litres PCC is significantly beyond current industry practises (the enhanced Building Regulation is currently 110 litres, and the national average is >140 litres), so this is certainly not easy. Marshall welcomes that policy will state “residential developments should be designed to achieve 80 litres/person/day unless demonstrated impractical”, and the same for non-residential development achieving full credits under BREEAM Wat 01.
- 8.4 The current calculation methodology for PCC does not allow for managed aquifer recharge (MAR). This needs to be amended before the 80 litres target is implemented otherwise this will have the unintended consequence of diverting rainwater which naturally recharges the aquifer into a non-potable rainwater harvesting systems, and then into the foul sewerage network, for treatment and disposal likely into a watercourse, not back into the ground. The same applies to non-residential development where full credits under Wat 01 require a form of water recycling.
- 8.5 Runoff should be allowed to infiltrate to the aquifer to reduce groundwater depletion. MAR must be allowable in qualitative and quantitative terms where existing permeable surfaces are recovered and water directed back into groundwater resources rather than through positively drained sewerage infrastructure to watercourses or treatment works. Therefore, the harvesting of rainwater from roofs, or other surfaces where natural systems can improve water quality ahead of infiltration to ground should not automatically be encouraged.
- 8.6 The changing climate will mean that rainwater cannot be a consistent uninterrupted supply of non-potable water, whereas greywater (and other treated wastewaters) does provide a consistent year-round supply of non-potable water. However, greywater systems work better at community and neighbourhood scales and not at a dwelling-level scale (this also improves both whole life cycle and operational carbon emissions) but currently no water company or other regulated utility company is allowed to own, operate and maintain non-potable water supplies (it is recognised that Eddington was an exception). This means that systems will be designed to deliver a solution that may not be properly operated or maintained, and for which consumers cannot be protected – either in terms of management fees payable, or outages and

levels of service. These systems may very well become technically inefficient or economically unviable and could become stranded assets, thus putting the stresses back onto the aquifer (further exacerbated by the risk that homeowners will replace low-flow fittings with systems that better suit current behaviours).

- 8.7 It should be noted that the Cambridge East team has had multiple meetings with Cambridge Water and Anglian Water regarding Cambridge East and infrastructure solutions have been provided with respect to potable water and foul water. There was some limited discussion with regard the use of non-potable water from Honey Hill WRC, but it was understood that foul water treated to a potable water standard would be injected back into the Cambridge Water potable water network for use by all consumers, rather than conveyed directly to Cambridge East. In this regard the 80 litres PCC metric needs to capture any district-scale water re-use that is inbuilt into the Cambridge Water potable network supply.
- 8.8 The Greater Cambridge Water Credits scheme is not yet operational. Although Marshall understands the first phase of the programme received £5.32m funding to deliver water savings through retrofitting households by installation of water efficient devices and identifying simple leaks, it is currently not suitable for developers. This scheme should enable developers to offset development impacts through the purchase and sale of water credits to ensure they have a neutral impact on water scarcity within Cambridgeshire. If developers are encouraged not to harvest rainwater that would naturally recharge the aquifer, and neighbourhood scale greywater systems carry too much operational / consumer risk, then the purchase of water credits would be necessary to approach 80 litres PCC. It is important that the authorities make progress with the Water Credits scheme, if the objectives of the draft policies are to be achieved.
- 8.9 Marshall therefore proposes that any target for reduction in per capita consumption (PCC) is managed in a phased mechanism to allow initially for Managed Aquifer Recharge (MAR) to be included within the 80 litre target; for some form of consumer protection with regard to greywater or non-potable systems; and ideally to allow time for treated foul water to be injected back into the potable water system by the incumbent sewerage undertaker. This phased implementation might also need to reflect progress with the water credit scheme that Marshall understood was to be developed across Greater Cambridge. Marshall stands ready to play its part but achievement of the draft plan's objectives are substantially dependent on the actions of the local authorities and statutory undertakers.

## 9 Infrastructure

---

9.1 Policy I/ID (Infrastructure and delivery) explains that development proposals are expected to comply with all relevant policy requirements. Where the policy requirements cannot be met, a viability assessment will need to be submitted for independent review. Where appropriate, clawback mechanisms will be incorporated into legal agreements to ensure additional contributions are provided should viability improve.

9.2 The Infrastructure Delivery Plan prepared to support the development strategy identified in the draft Plan suggests some specific requirements for Cambridge East in terms of infrastructure required either on the site, or as mitigation for the development. There are additional district wide requirements, but the following requirements are identified specifically for Cambridge East:

- Cambridge Eastern Access – Phase 2
- Series of site-specific active travel improvements across most proposed strategic sites
- Active travel routes to the Chisolm trail
- Active travel connections to:
  - Newmarket Road, Airport Way, Barnwell Road, Coldhams Lane, Sunnyside and Meadowlands Road surrounding the site
  - The Jubilee Cycleway, NCN 51 through Marleigh – Fen Ditton – Ditton Meadows – Chisolm Trail – North East Cambridge
  - Routes from the site to south Cambridge via Barnwell Road A1134 Fendon Road to the Biomedical Campus, Cherry Hinton, Queen Ediths Way and Gazelle Way
  - Routes towards central Cambridge including routes to Cambridge station, Davy Road, Mill Road and Coldhams Lane
  - Routes towards west Cambridge including to Eddington and West Cambridge Campus
- Mobility hub
- Delivery and consolidation hubs
- Connections to existing Public Rights of Way
- Parking barns
- Sensor and AI technology for Trip Budget adherence and on-site priority and management
- Cycle parking
- New electricity substation
- Air / river source heat pumps and district heating networks / large scale thermal storage – the County Council is exploring innovative technologies in the City Centre and at Cambridge East
- New healthcare facilities
- New library provision

- New cemetery space
- Fire – operational drop off point
- New swimming pool
- New sports hall
- Health & fitness suite
- Historic Cam Corridor Enhancements – Grantchester Meadows to Ditton Meadows
- Extend Wicken Fen
- Cambridge urban / peri urban forest – expanded tree planting in priority locations
- Greater Cambridge Chalk Stream Project – restoration to rare chalk stream
- Informal open space, children / young people provision, food growing provision

- 9.3 Some of these infrastructure requirements identify the developer as the delivery partner, others are attributed to the County Council or other partners to deliver. Some of the requirements are also shared amongst a number of sites, i.e. for the cemetery, it is reported that a new burial space is required to support Cambridge East, CBC and Grange Farm.
- 9.4 Marshall fully expects and is committed to providing a suite of infrastructure to support the site and ensure that any impacts of the development are properly mitigated. The masterplan is not yet developed for the site and so the precise nature of the infrastructure requirements has not been itemised to the level of detail in the IDP. Marshall wishes to reserve its position in respect of the infrastructure requirements needed to support development at Cambridge East and will engage with GCSP at the appropriate time to define what the list should comprise.
- 9.5 It is noted that GCSP is required to consider these requirements in the context of the overall development strategy and so these items are noted pending further discussion.