Representations on behalf of Hill Group

Draft Greater Cambridge Local Plan Regulation 19 Consultation

25 September 2026

Q260286

Report

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1 Introduction and Overview

1.1 This document has been prepared by Quod on behalf of the Hill Group (hereafter referred to as “Hill"), who have recently acquired from Marshall ownership of 285 hectares of land to the east of Cambridge, including Cambridge Airport - the site known as Cambridge East.

1.2 These representations reflect Hills views. Homes England is mindful that GCDC will become the LPA in due course, and given the relationship between Homes England and GCDC, Homes England does not want to create a perceived conflict in those roles as landowner and LPA. For this reason, Homes England are not commenting as part of these representations.

1.3 This document responds to the Greater Cambridge Shared Planning’s (“GCSP”) consultation on the Greater Cambridge Local Plan (“GCLP”): Proposed Submission Regulation 19 Consultation.

1.4 These representations follow those submitted by Quod on behalf of Marshall to the Regulation 18 consultation and Marshall’s previous engagement with GCSP’s officers in relation to the Local Plan.

1.5 The representations to the Regulation 18 GCLP identified and evidenced concerns with the scale of housing and employment growth proposed in the context of Government’s objectives for Greater Cambridge, as well as concerns with the prescriptive drafting in the Cambridge East site allocation (Policy S/CE). Those representations still stand unless otherwise stated in this document and are attached at Appendix 1 for ease of reference.

1.6 Since the publication of the Regulation 18 draft there have been a number of important changes in circumstance which should influence the approach adopted in the GCLP. Significantly, the Government held a consultation on establishing a centrally-led Greater Cambridge Development Corporation (“GCDC”) to help achieve its commitment of realising growth across Greater Cambridge. The results of the consultation were analysed and the GCDC was subsequently established on 23 July 2026.

1.7 In addition, East West Rail (“EWR”) has confirmed that Cambridge East station will form part of the project. This represents a material change in the site's context, enhancing its accessibility and sustainability credentials, and requiring the masterplanning of the Site to respond to the opportunities associated with a new strategic public transport hub and the growth it is expected to support.

1.8 The Regulation 19 draft GCLP fails to take both of these factors fully into account.

1.9 A key objective of the GCDC is to achieve transformational economic growth by supporting infrastructure-led development to address the issues caused by a historic mismatch between employment growth and housing supply, as well as dealing with the underlying constraints to delivering strategic-scale development in Greater Cambridge. As a statutory delivery body, the GCDC will bring together a suite of powers and capabilities to achieve the objectives set by Government:

- Land: Assemble land to unlock complex strategic sites.

- Planning: Coordinate planning and provide greater certainty for strategic development in plan-making and decision-taking.
- Financial: Invest in enabling infrastructure and leverage public and private investment.
- Commercial: Masterplan and coordinate delivery across multiple strategic sites.

1.10 Following its establishment, the GCDC is expected to receive some of its planning powers in 2027 (subject to Parliamentary approval). Specific arrangements and the date on which these powers will transfer are likely to be confirmed towards the end of 2026. It is intended that these arrangements will enable the GCDC to make decisions on strategic scale planning applications, and it is also expected that these planning powers will include those relating to plan-making, albeit the latter may not be available on day one.

1.11 In the meantime, the GCLP must respond to its own evidence base and plan for sufficient growth to meet the housing and employment needs of Greater Cambridge. Within that context, concerns remain over the scale of development proposed, the development strategy, and restrictive drafting of the plan as it relates to strategic sites, particularly in relation to Cambridge East.

1.12 It is a concern to Hill that the GCLP is seeking to set overly prescriptive site allocation policies for strategic sites such as Cambridge East. This approach risks fixing matters at this stage which should properly remain capable of being considered and refined through the application preparation process.

1.13 The GCLP should focus on establishing the strategic framework and key parameters for these sites, rather than prescribing matters in such detail that it limits the ability to respond to the circumstances of the sites as they progress.

1.14 Hill recognise the challenges that GCSP are seeking navigate by only planning for a scale of development, whilst knowing that Government is separately seeking to deliver a significantly greater scale of growth. In that context, Hill realise that the GCLP will be the basis or foundation for Cambridge's future growth, which GCDC will expand upon once the GCLP is adopted. Notwithstanding this, given the Government's aspiration for transformational growth, the policies in the GCLP should set an appropriate baseline and should not limit the pace and scale of delivery.

1.15 In principle, Hill support the Cambridge East policy and the allocation of the site. The comments within these representations are intended to strengthen the policy, and other policies that would influence the masterplanning of the site, so that it delivers better placemaking and development outcomes, while also improving deliverability. Given the scale, complexity and likely build-out period of the site, a more flexible approach will help ensure the policy remains effective over time and supports the achievement of the intended outcomes.

1.16 In light of the above, these representations:

- Reinforce previous representations regarding the scale of employment and housing need, and the development strategy;
- Set out information relating to Cambridge East, including Hill's proposals that it should be extended into land currently designated as Green Belt, east of Airport Way.

- Review the detail of the proposed site allocation Policy S/CE, as well as other Development Management policies, and proposes how these policies should be amended to ensure they do not inhibit the pace and scale of delivery and the quality of the proposed scheme at Cambridge East.

1.17 In this context, these representations are structured as follows:

- Section 2: Comments upon GCLP's strategic approach, and specifically Cambridge East;
- Section 3: Policy S/CE which allocates development at Cambridge East;
- Section 4: Covers other Development Management Policies, including Skyline and Tall Buildings and Open Space standards; and
- Section 5: Infrastructure and Viability

2 GCLP Strategic Approach & Cambridge East

GCLP Strategic Approach

Policy S/JH

2.1 Marshall's representations to the Regulation 18 consultation, which we endorse, supported the ambition to deliver sustainable growth in Greater Cambridge, but concluded that the draft Plan was unambitious in responding to the area's economic potential and national policy objectives. It was noted that the Plan was only planning to meet its minimum housing requirement and therefore was failing to respond with housing proposals that reflect the scale of the economic opportunity.

2.2 It was flagged in the previous representations that Government policy recognises that housing requirements may need to exceed minimum assessed housing need where this is necessary to support economic growth ambitions or major infrastructure investment. In the case of Cambridge, successive Government statements have consistently identified the city and its wider economic area as being of national importance, with a clear objective of unlocking and accelerating growth. Furthermore, the evidence base prepared in support of the Regulation 18 GCLP demonstrated that higher growth scenarios had been tested and could be delivered, provided that appropriate investment was made in housing, transport and other supporting infrastructure.

2.3 Against this background, the representations concluded that the Plan's reliance on a more cautious growth scenario appeared difficult to reconcile with the Government's stated ambitions for Cambridge and the need to address longstanding challenges relating to housing affordability, labour supply and economic competitiveness. It was suggested that a positively prepared plan should seek to facilitate and enable growth by planning proactively for future opportunities, rather than embedding assumptions that risk constraining the area's economic potential.

2.4 Since the Regulation 18 consultation, Government has confirmed that the GCDC will assume plan making powers post adoption of the GCLP. However, that should not alter the growth minded ambition that should be applied to the GCLP, especially as it will set the baseline for GCDC's future growth plan.

2.5 The GCSP has not acknowledged, through amendments in the relevant policies, that the horizon has changed as a result of the establishment of the GCDC, nor the announcement by EWR that there will now be a mainline station adjoining the Cambridge East site.

2.6 Government has clearly and repeatedly stated that it considers supporting the growth of Greater Cambridge and its economy to be a national priority. Such statements have come in the form of written ministerial statements, publications and considerable funding for infrastructure aimed at unlocking development.

2.7 Mayor Bristow's Local Growth Plan matches this ambition, seeking to double the size of the Combined Authority's economy with a stretch target to triple it.

2.8 One of the most significant actions that Government has taken is the establishment of the GCDC. As the GCDC consultation document[1] states:

"The proposed Development Corporation would have a clear remit to deliver lasting benefits for both existing and future communities. It would do so by accelerating economic growth; coordinating enabling infrastructure; leveraging public and private investment; delivering environmentally sustainable outcomes; and reducing inequality through affordable housing and skills development. Building upon the exceptional quality of place seen across much of Greater Cambridge, the objective of the Development Corporation would be to deliver exemplary development in the form of high-quality, well-designed, attractive, and sustainable homes and neighbourhoods."

2.9 In respect of the GCDC's role in planning making and decision making, Government's response to the consultation explained that granting these powers was "*essential to accelerating strategic growth in an integrated and coordinated way*".

2.10 The consequence of these Government announcements, in particular the formation of the GCDC, is so significant to the strategic planning of Greater Cambridge that it should be acknowledged in the approach of the GCLP. The risk of not doing so would be to undermine the '*integrated'* and '*coordinated'* planning of Greater Cambridge, inconsistent with Government objectives.

2.11 However, the approach of the GCLP has not materially changed since these announcements were made, and there is a risk that its restrictive approach is now even more out of step.

2.12 Consequently, Hill stand by the previous comments raised in respect of Policy S/JH forming part of Marshall's Regulation 18 representations that are included as Appendix 1. These state that the evidence continues to demonstrate that significantly higher levels of employment and housing growth are possible. The GCLP should provide the strategic platform from which the GCDC can prepare and deliver their Growth Plan, enabling future investment and growth opportunities to come forward. Instead, the draft GCLP seeks to define growth by reference to existing infrastructure constraints and minimum requirements, potentially prejudicing the ability of the GCDC to pursue a more ambitious strategy.

Policy S/DS

2.13 It is evident from the latest wording of draft Policy S/DS, and it is confirmed through the Development Strategy Topic Paper, that there are no substantial amendments to the approach to the development strategy in the Regulation 19 version of the GCLP. Therefore, the draft policy confirms that the need for jobs and homes will be met through a blended strategy on sites in the following order of preference:

- Within the Cambridge urban area;
- On the edge of Cambridge;
- At an expanded Cambourne;
- At other new settlements; and

[1] Ministry of Housing, Communities and Local Government – 'Establishing a Development Corporation in Greater Cambridge' – Executive Summary

- In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.

2.14 On that basis, Hill wish to reiterate the comments submitted through Marshall's Regulation 18 representations, which remain relevant following publication of the Regulation 19 evidence base.

2.15 Whilst draft Policy S/DS is presented as a strategy to support sustainable growth, climate change objectives and a polycentric pattern of development, the practical effect of the policy is to prioritise the retention of Green Belt land over the delivery of growth in the most sustainable locations.

2.16 The chosen strategy is inconsistent with the Councils' own evidence base, which repeatedly identifies Edge of Cambridge Green Belt locations as among the most sustainable locations for growth.

2.17 Should the Local Plan Inspectors conclude that the GCLP should plan for a higher level of growth and/or that it should provide additional sites to enable choice and flexibility to achieve growth requirements, Hill reiterate representations submitted at Regulation 18 stage on the appropriateness of the Expansion Land (as described later in this section) for development, as part of a coordinated Cambridge East development.

Cambridge East Site Allocation

2.18 Hill have responded to the Government's call for action in seeking to accelerate the delivery of Cambridge East as a well planned, high quality, sustainable community.

2.19 Hill has commissioned a full consultant team to commence the preparation of a planning application, and whilst the capacity of the GCDC is not yet set up to include development management powers, early stage engagement is underway. This early engagement will help to shape the form and content of the development, which will form the basis of a planning application to be submitted to the GCDC before the end of 2027.

2.20 Hill are very concerned that the nature of the Cambridge East development and the effectiveness of any engagement with GCDC could be compromised by the overly-prescriptive approach adopted in the Cambridge East site allocation (Policy S/CE).

2.21 Cambridge East is a development opportunity of national importance. Few if any sites in the country hold the same potential. Its scale and location make it a unique opportunity to establish the next chapter in the remarkable story of the City of Cambridge and the Greater Cambridge area.

2.22 The allocated 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.

2.23 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 potential should be maximised.

2.24 As set out in detail in Section 3 of these representations, the draft site allocation for Cambridge East in the GCLP strays into a level of detail that is inappropriate for a strategic policy, and has the capacity to stifle future growth on the site. Policies affecting Cambridge East should be framed in broad strategic terms and should avoid imposing detailed requirements that could prejudice future decision-making and plan-making by the GCDC or restrict one of the country's most important growth locations.

2.25 There is a real risk that the requirements being imposed on Cambridge East are not reflective of the objectives of up-to-date national policy for Cambridge. To stipulate detailed site specific requirements now prejudges decisions and the creation of a planning framework which will be developed further by the strategic authority.

2.26 The NPPG is clear that plans should be concise and that sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of the development. The Cambridge East site allocation policy is overly detailed and contrary to the NPPG on the basis that it seeks to control matters better left to design codes, masterplans or the development management process.

2.27 Cambridge East is recognised by GCSP to be one of the most, if not the most, sustainable locations to accommodate a significant scale of growth around Cambridge. The importance of the site to the successful economic growth of the Cambridge as a whole should not be under-estimated. It is therefore highly unusual and concerning that the site allocation policy for Cambridge East is drafted to an unnecessary level of detail.

2.28 It is for Government and the Local Plan Inspectors to determine whether it is sensible that one of Cambridge's most significant opportunities for growth may be constrained by policies drafted in a Local Plan which takes no account of the Government's growth agenda. However, Hill wish to register their concern at that principle.

2.29 Hill accept that, because of its importance to meeting GCSP's minimum housing / economic growth requirements Cambridge East needs to be captured as a strategic site allocation in the GCLP. However, the sensible approach would be for the policy to focus on general principles rather than seeking to create a blueprint for the development through the over-specification of constraints, demands and limits.

2.30 The overly detailed and constraining approach to the allocation is unsound and should be reconsidered. The most critical elements of the drafting are addressed in Section 3 of this document, with alternative wording suggested where appropriate.

Cambridge East Expansion Land

2.31 Hill considers that the scale of growth potential that could be achieved, together with the ability to service the site by sustainable modes / public transport, justifies optimising the allocation at Cambridge East and readily justify the allocation of additional land east of Airport Way and North of Newmarket Road as part of the development (known as the 'Expansion Land').

2.32 The suitability of the Expansion Land was set out in a previous Call for Sites submission in March 2025.

2.33 The 'Expansion Land' extends to 131 hectares and could accommodate thousands of homes and jobs in combination with the development allocated on the Airport Land. The Expansion

Land provides an opportunity to design and plan a new urban quarter holistically, optimising the opportunity to deliver transformative growth, connected green infrastructure, and address the current lack of cross-city connectivity by enabling sustainable transport connections that contributing to resolving the city's congestion issues.

2.34 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 create a thriving new urban quarter and to drive economic growth. Expanding the site to include land east of Airport Way and north of Newmarket Road would provide the critical mass needed to unlock 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 an urban expansion to ensure maximum integration and synergy.

2.35 Proposals for Cambridge East train station confirm the suitability of the location for growth. The revised NPPF (2026) confirms the Government's intention to provide '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 by making the most of high levels of connectivity, and improving access to jobs and services.

2.36 As set out in our response to the Regulation 18 consultation, there is no evidence that the merits of the Expansion Land or its obvious alignment with the Development Strategy have been properly considered in the GCLP process. Previous Green Belt evidence prepared by the local authorities has assessed the impact of development on Green Belt parcels around the edge of Cambridge. The Joint Inner Green Belt Boundary Study (2012) identified that parcels to the east of the City were of lesser significance to development impact on Green Belt land than Green Belt land to the south, west and some northern parcels.

2.37 Through the Regulation 18 representations, reservations were previously expressed about the approach to the Development Strategy and whether the preferred strategy truly reflected what the evidence base is suggesting are the most sustainable locations for growth. Hill endorse those representations.

2.38 Hill are undertaking masterplanning of the site which includes the Expansion Land to ensure that the opportunities for growth at Cambridge East are realised in a planned, sustainable and considered way.

2.39 Further details relating to Cambridge East, including the Expansion Land east of Airport Way, are set out at Appendix 2. Should Local Plan Inspectors conclude that the GCLP should plan for either more than current growth assumptions and/or that additional sites are required, the information in Appendix 2 (alongside previous representations) explains the benefits of Hill's proposals and the justification for its release from the Green Belt having regard to the clear evidence base and its allocation in the plan.

2.40 Hill are aware of the Greater Cambridge Green Belt Assessment: Review which was released as an evidence base to the GCLP. Given Hill's view on the approach of GCLP in the context of wider growth – and particularly the Plan's in principle opposition to the release of further Green Belt land – this representation does not seek to provide a detailed review of the evidence base document. Notwithstanding, Hill do not consider the document to have been prepared in accordance with the requirements of the national policy, specifically in relation to the legitimacy of releasing Green Belt to meet the need for sustainable development, and in

relation to the definition and assessment of grey belt land. Hill will address these matters as part of their forthcoming planning application.

3 Policy S/CE: Cambridge East

Introduction

3.1 Representations submitted to the Regulation 18 consultation on behalf of Marshall provided support for the allocation of the safeguarded land for a new urban quarter. Notwithstanding this, there were comments raised relating to a number of elements of the policy that were either considered to be too detailed for this stage of the Plan, start to prematurely predetermine a masterplan which the policy identifies as still to be developed, and / or are not justified having regard to the evidence base supporting the Local Plan.

3.2 Since the publication of the Regulation 18 draft GCLP, the Government has confirmed that the GCDC will be the planning authority for the Cambridge East application. As a result, the concerns raised in our Regulation 18 representations are intensified.

3.3 The NPPG is clear that plans should be concise and that sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of the development. The Cambridge East site allocation policy is overly detailed and contrary to the NPPG on the basis that it seeks to control matters better left to design codes, masterplans or the development management process. The policy should be framed in broad strategic terms and should avoid imposing detailed requirements that could prejudice future decision.

3.4 Cambridge East represents one of the most significant regeneration and growth opportunities in Greater Cambridge and the wider UK, with the capacity to make a substantial contribution towards meeting the area's housing, economic growth, infrastructure and placemaking objectives. However, the full opportunity that this Site presents cannot be achieved through an overly detailed and constraining approach to the allocation.

3.5 The majority of the key points raised at Regulation 18 stage remain relevant particularly as some policy wording has become even more prescriptive, which is a move in the opposite direction to the flexibility sought in the Regulation 18 representations. In addition, further technical work, changes in site ownership, the advancement of EWR and Cambridge East Station proposals, and the evolving strategic planning context have highlighted a number of additional matters that should be addressed to ensure that the policy is effective, deliverable and capable of realising the full potential of Cambridge East.

3.6 The primary matters are explained in turn below, with a number of other necessary changes captured in Table 3.1. Appendix 3 provides a track changed version of the policy and its supporting text based on Hill's proposed amends.

Cambridge East Allocation Boundary & Green Belt Corridor

3.7 Criteria 1 of the policy states that the built area of Cambridge East "will be contained within the Site Allocation boundary identified on the Proposals Map".

3.8 The Proposals Map shows a definitive site allocation boundary which is split by the proposed green corridor.

3.9 However, the explanatory text to the policy specifically acknowledges that the green corridor alignment as shown is not the appropriate final form and that the precise boundary is to be determined through future masterplanning as set out in paragraphs 3.2.13 and 3.2.14.

3.10 Hill agree that the masterplanning exercise should ultimately determine the correct boundaries and alignment of the green corridor. However, the policy currently suggests that development within the corridor would be subject to Green Belt policy restrictions, notwithstanding that the extent and function of the corridor will only be established through the masterplanning process.

3.11 This is a disappointingly restrictive policy for one of the most important growth locations in Greater Cambridge. Hill continue to challenge the principle of the Green Belt designation through the corridor, as the land does not fulfil the purposes of the Green Belt as set out in the NPPF. The principle and function of the corridor can be secured through the policy framework and masterplanning process without imposing a restrictive and inappropriate Green Belt designation.

3.12 Instead, the site allocation boundary should cover the full site (including the green corridor), and the policy should be clear that the masterplanning process associated with the preparation of a planning application will define and agree the precise alignment, extent and boundaries of the corridor. Proposed revised explanatory text wording is set out in Table 3.1.

3.13 In previous representations we have explained why the land should not be designated as Green Belt at all, or require any “compensatory widening”. The supporting text at paragraph 3.2.14 suggests additional widening may be required where narrowing of the corridor is identified through the masterplanning process.

3.14 If the masterplanning exercise demonstrates that a revised corridor alignment or width is necessary to achieve high-quality placemaking whilst maintaining or enhancing the function of the green corridor, there should be no requirement for further additional provision elsewhere.

3.15 The masterplanning process is the appropriate mechanism through which the extent, alignment and function of the corridor should be tested and resolved. Requiring additional widening would prejudge the outcome of that exercise and impose an unnecessary constraint. The key consideration should be whether the function of the corridor is maintained or enhanced overall, not whether any reduction in width at one location is offset elsewhere.

3.16 Accordingly, the supporting text should be amended to confirm that the boundaries, alignment and width of the green corridor will be determined through the masterplanning process and that no automatic requirement for additional widening will apply where the corridor's function is maintained or enhanced overall.

3.17 Hill stand by the Regulation 18 representations in challenging the principle of the Green Belt designation, the inappropriateness of potential additional widening of the corridor and its omission from the site allocation boundary. The Regulation 19 representations further emphasise that the boundaries and extent of the corridor should be determined through the masterplanning process and as a result the corridor should be included in the Site Allocation boundary.

Masterplanning & Indicative Spatial Framework

3.18 The Regulation 19 draft has introduced a new policy requirement (criteria 2) in respect of masterplanning. In summary it requires the following:

- A site wide masterplan is to be prepared in conjunction with the Council and in consultation with the local community and other stakeholders;
- The masterplan is required to "broadly align" with the Indicative Spatial Framework;
- The masterplan is to identify the broad distribution of land uses, infrastructure delivery and phasing;
- The masterplan is to be used as a "basis for the consideration of subsequent applications"; and
- The masterplan is required to be "agreed by the Council prior to the approval of any planning applications".

3.19 This new wording fails to understand the realities of how Cambridge East will be planned and delivered.

3.20 Hill envisage submitting a hybrid planning application. Given the scale of the Site and the long delivery period, the majority of the development will be sought in 'outline'. As is common for schemes of this nature, the outline component of the application will be supported by a set of Parameter Plans and a Design Code which will set the envelope for the testing of the scheme in the Environmental Statement, and will create a flexible framework to control the submission of Reserved Matter Applications.

3.21 The outline application will be supported by an illustrative masterplan which will show one way the development might come forward consistent with the Parameter Plans and Design Code. However, this masterplan will only depict one possible outcome and is indicative.

3.22 It is entirely inappropriate to produce a masterplan that will be agreed with the Council, ahead of any planning application, and for that masterplan to guide future applications. The process of agreeing a masterplan ahead of the submission of an application would be an unnecessary step that would inevitably delay the submission of the application, without adding any benefit to the planning process. The same outcomes can be achieved through the application process.

3.23 In addition, to approve a masterplan ahead of the submission of a planning application would have the consequence of fettering the decision-making of the authority determining the application. An approved masterplan would fix certain elements of the scheme and the substantive content of an application before it has the benefit of full assessment through a suite of supporting information and an EIA is submitted with an application.

3.24 The paragraph should be deleted in full.

Place Book

3.25 The Regulation 19 wording has introduced the concept of a 'Place Book'.

3.26 At criteria 3 of the policy it is suggested that a site-wide Place Book should be prepared to "*establish the vision, place-making objectives and quality expectations for the new community and provide the foundation for a site-wide masterplan and design codes*".

3.27 Paragraph 3.2.4 of the explanatory text explains that the Place Book will "*articulate the place-making principles, outcomes and quality expectations that will guide its planning, design and delivery. It will set out the characteristics, ambitions and defining qualities that are intended to shape the new settlement, whilst demonstrating how key themes such as movement, green and blue infrastructure, land use, community infrastructure, health and wellbeing, climate resilience, governance and stewardship should work together to create a sustainable, distinctive and well-connected place*".

3.28 Paragraph 3.2.5 also explains that the Place Book will "*provide the foundation for subsequent spatial planning and design work, informing the preparation of a site wide masterplan, together with parameter plans, a strategic design code, place briefs and detailed design codes. These documents will translate the vision, principles and outcomes established through the place book into a coherent spatial structure and development framework capable of phased implementation whilst maintaining a consistent and high-quality sense of place throughout the lifetime of the development*".

3.29 Hill endorse the need for the Cambridge East planning application to address the matters referred to in the policy and supporting text – namely '*place-making principles, outcomes and quality expectations that will guide its planning, design and delivery.* As is traditional for applications of this nature, Hill propose to address these matters within the body of key application documents in particular the Parameter Plans and Design Code.

3.30 However, the current drafting suggests (much like the masterplanning process) that the Place Book will be prepared and agreed with the Council prior to the submission of an application, in order to inform the Parameter Plans and Design Code. Hill consider this to be an unnecessary step that will have the effect of delaying the submission of the application, without adding any benefit to the planning process. Instead, the applicant and local planning authority should work together constructively through the pre-application process, with the ultimate control being that if agreement is not reached planning permission will not be granted.

Quantum

3.31 Marshall's Regulation 18 representations confirmed that capacity testing and supporting technical evidence that had been prepared demonstrated that Cambridge East could accommodate development at a scale significantly greater than that proposed in the draft allocation.

3.32 While the draft allocation identified capacity for approximately 8,000 dwellings, Marshall's position was that this figure should be treated as a minimum, reflecting the site's extensive brownfield characteristics, sustainable location, and the benefits of the proposed Cambridge East station, which would support higher densities and a greater quantum of employment floorspace.

3.33 Marshall also highlighted that the policy understated the site's economic potential, contending that Cambridge East could accommodate world-class employment development alongside a substantially larger residential-led mixed-use community.

3.34 Since the Regulation 18 representations were submitted, two significant changes have occurred that further strengthen the points raised in those representations in respect of quantum.

3.35 Firstly, EWR has confirmed through its DCO consultation in April – June 2026 that a Cambridge East station will form part of the scope of the project. This was anticipated in the supporting text of the Regulation 18 version of the Plan which acknowledged that *"if a station were to be included in the East West Rail Development Consent Order application this would alter the local context; this could therefore result in a change of scale and layout of development at Cambridge East to that outlined above."*

3.36 The confirmation of the station, therefore, represents a significant material change in circumstances which has not been reflected through changes to the policy. The failure of the policy to respond meaningfully to the confirmation of the station means the Plan is already lagging behind the evolving strategic context for Cambridge. The station significantly enhances the sustainability credentials of the allocation, creates opportunities for higher density development particularly in the south of the site and reinforces the site's overall ability to accommodate a greater quantum of housing and employment development. The policy should fully reflect the opportunity presented by this station by optimising quantum and density of development on the site.

3.37 This is not currently reflected in the policy. Hill note that whilst some additional text has been added to the policy recognising that the development must realise the strategic opportunity presented by Cambridge East railway station, it continues to refer to the same scale and quantum.

3.38 Secondly, ownership of the site transferred from Marshall to Hill / HE in June 2026. The allocation is therefore entering a new phase, with a comprehensive masterplanning exercise now being progressed by parties whose shared ambition is to deliver a high-quality, sustainable and nationally significant new city district.

3.39 Hill's experience of delivering large-scale mixed-use communities provides a strong platform for a more ambitious vision for the site. The emerging masterplanning process will test how best to optimise the opportunities presented by the site, including the confirmed railway station, whilst delivering exemplary placemaking.

3.40 Against this context, it is surprising that the policy continues to identify the same development quantum as the Regulation 18 version of the Plan. This is reinforced in the new NPPF (2026) which makes clear at Policies L2 and L3 (which immediately take effect in decision-taking) that brownfield land should be optimised by achieving appropriate densities in order to meet as much housing need as possible. Policy L3(2)(a) specifically states that *"within settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated."*

3.41 NPPF Policy L3 is clear that development proposals that do not make efficient use of land will be refused. This is the policy test that any application at Cambridge East will be required to demonstrate.

3.42 Overall, the changes in circumstances since Regulation 18 significantly strengthen the case that the quantum identified for Cambridge East is no longer an appropriate reflection of the site's development potential. The confirmation that a Cambridge East station will be delivered through the EWR DCO process, together with the transfer of the site into the control of Hill

and Homes England and the commencement of a comprehensive masterplanning exercise, materially alter the context within which the allocation should be planned and delivered. These changes reinforce the conclusions of the Regulation 18 representations that the site is capable of accommodating development at a scale substantially greater than 8,000 dwellings whilst continuing to deliver high-quality placemaking, sustainable transport outcomes and significant employment growth.

3.43 In these circumstances, it is difficult to justify the continued inclusion of the same approximate quantum that appeared in the Regulation 18 draft Plan. The allocation now benefits from a confirmed strategic transport investment that will support higher densities and more intensive development, particularly around the station area, and national policy is increasingly focused on optimising the use of sustainable brownfield land. Retaining an unchanged figure risks unnecessarily constraining the long-term potential of the Site.

3.44 Whilst the ongoing masterplanning process will establish the most appropriate development capacity for the site, it would be premature to replace the existing figure with a higher specific number that has not yet been formally tested and evidenced. The more appropriate response is for the policy to recognise that 8,000 dwellings represents **a minimum capacity** rather than an approximate capacity. This would ensure the allocation remains sufficiently flexible to respond to the confirmed station and the emerging evidence base whilst remaining consistent with national planning guidance.

Specific Uses

3.45 In the Regulation 18 representations, Marshall supported the objective of delivering a genuinely mixed-use development at Cambridge East but set out that the policy should retain sufficient flexibility to allow the future masterplan to determine the most appropriate mix of uses and development quantum. Marshall considered that references to specific facilities and a fixed requirement for 10% specialist housing were overly prescriptive at this stage and should instead be guided by up-to-date evidence of need, market demand and placemaking considerations over the long-term build-out of the site.

3.46 Rather than responding to those concerns, the Regulation 19 version of Policy S/CE has become increasingly prescriptive, with additional requirements and specific facilities now identified within the draft policy. This is considered to be inappropriate for a policy that is intended to operate at a strategic level.

3.47 Specific concerns are as follows:

- 10% of the homes are to be specialist accommodation (within use classes C2 or C3) particularly for older people or those with disabilities (policy criteria 7aii) – Hill support the need for the development to include a range of dwelling types and tenure, importantly including specialist accommodation, however, the 10% requirement is unnecessary and is not supported by the evidence base. GCSP's Development Strategy Topic Paper Appendix 12 confirms that the Housing Needs of Specific Groups (HNSG) Update *"potentially overstates the level of need"* (paragraph 1.3). The HNSG makes clear that the current and future demand for specialist accommodation is influenced by a host of factors. On that basis, it is premature to assume what percentage of the houses will be needed for specialist accommodation. The requirement is also inconsistent with other policies in the Plan, such as Policy H/SH which allow schemes to provide their own evidence. Policy

H/SH relates to specialist housing, and only requires unallocated schemes to provide 10%. Given there is already a policy proposed on specialist housing, any application would be determined in that context and therefore the unjustified level of specialist housing Policy S/CE is also unnecessary. The proportion of specialist housing should therefore be removed from the policy;

- Provision of sports and leisure facilities (criteria 7di and 7dii) – Hill support the inclusion of sports and leisure facilities within the development, which may include a swimming pool and sports hall. However, the policy is unnecessarily prescriptive in specifying the dimensions of a swimming pool, identifying a preferred location, and requiring the sports hall to be collocated with the pool. At this stage of the masterplanning process it is premature to prescribe the form, scale, location and relationship of these facilities. These matters should instead be determined following a thorough masterplanning process;

- "Provision of a regional cultural hub that will complement and not compete with Cambridge city centre. This will include but not be limited to provision of a creative hub comprising a mix creative work, production and leisure spaces, and a community arts centre" (policy criteria 7e) – As above, Hill support the intent of the development accommodating cultural facilities, however, the specificity in the policy wording is not effective ahead of masterplanning and community engagement to ascertain the nature of those facilities.

3.48 Given the scale of the allocation and the need to complete a masterplanning process as part of a planning application, it is neither necessary nor appropriate for the policy to prescribe such detailed matters at this stage.

3.49 The needs of future residents, businesses, visitors and the wider Greater Cambridge area will continue to evolve over the lifetime of the development, as will the evidence base that informs infrastructure and community facility requirements.

3.50 The allocation is now entering a new phase under the ownership of Hill / HE, with a comprehensive masterplanning exercise having started and engagement with GCDC underway.

3.51 That process should be free to establish the most appropriate land use strategy for the site, informed by robust evidence, stakeholder engagement and a clear vision for the creation of a successful new city district. Whilst the policy should identify the broad range of uses that may be appropriate within a major mixed-use allocation, it should not seek to predetermine the precise nature, scale or specification of individual facilities.

3.52 Hill are open to a more flexible form of words that accepts that the scheme would be expected to include sports and leisure facilities which may include a swimming pool and indoor sports centre, and cultural facilities, but allows the nature of these uses to be informed by need and evidence within the planning application. Proposed amended wording is included in Table 3.1 below.

Heritage

3.53 At Regulation 18 stage, Marshall supported the objective of conserving and celebrating the site's heritage assets, including the Grade II listed Control and Office Building, but considered that the policy was overly prescriptive in identifying specific buildings for retention and predetermining heritage outcomes ahead of the masterplanning process. Marshall highlighted that matters such as the treatment of Hangar 1, the relationship between new

development and heritage assets, and the protection of Teversham's setting should be addressed through detailed masterplanning.

3.54 Hill endorse the amendments to the wording of paragraph 10(a) which now seek to ensure that the retention of any historic buildings (beyond the control and office building) is determined based on a thorough assessment of their heritage significance through a planning application. However, some minor amendments to the policy wording are required (see Table 3.1) to ensure that the wording is not misinterpreted and to ensure that the text allows for buildings to be modified or removed if it is deemed that this forms part of the optimum approach once a thorough assessment has been undertaken.

Site Delivery

3.55 Marshall's Regulation 18 representations highlighted the importance of retaining the site-specific viability provisions contained within the adopted Cambridge East Area Action Plan ("AAP"). These comments are still relevant as they have not been reflected in the current drafting. On the basis that the AAP will be superseded by the GCLP, the Development Plan will no longer acknowledge the specific viability considerations associated with the delivery of Cambridge East that have formed part of the planning framework for the site since adoption of the AAP.

3.56 The circumstances which justified the inclusion of site-specific viability wording in the AAP remain materially unchanged. Cambridge East remains a strategic, long-term development opportunity requiring substantial enabling investment, including infrastructure delivery, relocation of existing operations, demolition and remediation works. These are recognised characteristics of the site and should continue to be reflected in the policy framework.

3.57 The viability wording contained within the AAP provides an appropriate policy mechanism for recognising the unique and complex development circumstances of the site and the need to balance a wide range of policy, infrastructure and placemaking objectives as detailed proposals come forward, in accordance with Policy DM5 of the NPPF (2026). This approach was tested through the delivery of the Marleigh development and has provided a clear and effective framework for considering affordable housing and other planning obligations alongside the site's specific development requirements.

3.58 In the absence of any substantive change in circumstance that would justify a departure from the AAP approach, Hill consider it appropriate that the relevant viability provisions are carried forward into the Regulation 19 policy. Reinstating this wording would provide clarity and consistency for applicants, decision-makers and stakeholders, ensure continuity with the established planning framework for Cambridge East, and recognise the site's unique delivery context.

Transport

3.59 Transport is a significant consideration for the delivery and ultimate capacity of Cambridge East. Marshall's Regulation 18 representations supported the sustainable transport principles then proposed for Policy S/CE, including low-car development, walkable neighbourhoods, high-quality active travel and public transport connections, mobility hubs and a monitor and manage approach. Those representations nevertheless identified the need for the policy to retain sufficient flexibility to respond to evolving evidence, infrastructure programmes and travel behaviour over the long build-out period. Hill continue to rely on those representations where they remain relevant.

3.60 The publication of the Interim Greater Cambridge Transport Strategy (GCTS) represents a material change since the Regulation 18 consultation and should be acknowledged in the Plan. Hill welcome the provision of an updated strategic framework and its emphasis on enabling growth through an integrated package of public transport, active travel and demand-management measures. This direction is consistent with the vision-led approach advocated at Regulation 18 and with the ambition for Cambridge East to be a highly sustainable, well-connected new city district.

3.61 However, the Interim GCTS does not remove the need for flexibility in Policy S/CE. A number of the strategic interventions relevant to Cambridge East remain subject to further development, funding, phasing and delivery decisions. The site-specific transport strategy should therefore be established through the planning application using the best available evidence at that time, with an appropriate trip budget agreed as part of that process and supported by monitoring, review and phased mitigation. Exact trip-budget figures or a fully defined package of strategic measures should not be fixed prematurely through the Local Plan, particularly where delivery depends on third parties or infrastructure beyond the Site.

3.62 The updated strategic context reinforces rather than diminishes the case made at Regulation 18. Cambridge East can directly deliver substantial walking, cycling, public transport and mobility infrastructure within the Site, facilitate wider connections and make appropriate contributions to off-site measures. Its transport strategy must also respond positively to the confirmed Cambridge East railway station, the proposed Newmarket Road Travel Hub and emerging wider connections, whilst recognising the existing trip-making associated with the operational airport as a basis for early phases. The amendments proposed in Table 3.1 accordingly seek a proportionate, evidence-led and adaptive framework that secures sustainable outcomes without constraining the Site's development potential before the relevant modelling and application-stage assessment have been completed.

Table 3.1 – Detailed Proposed Amendments to draft Policy S/CE: Cambridge East

Policy Paragraph	Policy Reference	Representations	Proposed Amendments
Paragraph 1 Paragraph 7(a)	*"A new city district of approximately 8,000 homes delivered from 2032, subject to the necessary water infrastructure being available, significant employment floorspace in use classes E(g) and approximately 20,000 square metres gross internal area (GIA) of B2/B8 employment floorspace, with a range of supporting services and facilities including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the Site Allocation boundary identified on the Policies Map."* *"Cambridge East is allocated for mixed-use development as shown on the Policies Map and indicative Spatial Framework comprising:* *a. Approximately 8,000 homes (to deliver 3,950 dwellings to 2045 subject to the necessary water infrastructure being available) of a range of sizes, types and tenures to meet the identified diverse housing needs and to support a mixed and balanced intergenerational community, specifically including"*	As explained in the narrative above, the confirmation of a Cambridge East station through the East West Rail DCO process, together with the transfer of the site to Hill and Homes England and the commencement of comprehensive masterplanning, materially strengthen the case that Cambridge East can accommodate development beyond 8,000 dwellings. These changes reinforce earlier evidence that the site has capacity for a significantly greater quantum of development whilst delivering high-quality placemaking and sustainable growth. However, pending completion of the masterplanning and supporting evidence, it would be premature to identify a higher specific quantum. The policy should therefore be amended to refer to a minimum of 8,000 homes rather than approximately 8,000 homes, providing flexibility to optimise the site's development potential and respond to the confirmed railway station and evolving evidence base without imposing an unnecessary constraint on growth. A technical point in relation to the last sentence of this paragraph – this sentence is not strictly true as other parts of the draft policy acknowledge the ability for the boundaries of the Green Belt corridor to flex, subject to a masterplanning exercise. The Site Allocation boundary currently excludes an arbitrary 300m wide Green Belt corridor. To ensure this final sentence of Paragraph 1 is accurate and aligns with the narrative identified above, the Site Allocation boundary should include the green corridor, which should then be safeguarded in the policy and on the Indicative Spatial Framework.	Paragraph 1: *"A new city district of ~~approximately~~ a minimum of 8,000 homes delivered from 2032, subject to the necessary water infrastructure being available, significant employment floorspace in use classes E(g) and approximately 20,000 square metres gross internal area (GIA) of B2/B8 employment floorspace, with a range of supporting services and facilities including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the Site Allocation boundary identified on the Policies Map."* Paragraph 7(a): *"Cambridge East is allocated for mixed-use development as shown on the Policies Map and indicative Spatial Framework comprising:* *a. ~~Approximately~~ A minimum of 8,000 homes (to deliver 3,950 dwellings to 2045 subject to the necessary water infrastructure being available) of a range of sizes, types and tenures to meet the identified diverse housing needs and to support a mixed and balanced intergenerational community, specifically including"* Expand Site Allocation boundary on the Proposals Map and on the Indicative Spatial Framework to include the green corridor.
Paragraph 2	"*A site wide Masterplan will be prepared by the landowners and/or promoters in conjunction with the Council and in consultation with the local community and other stakeholders. The Masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 37 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The Masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the Council)."*	The proposed masterplanning requirements do not reflect the anticipated planning framework for Cambridge East. Given the scale and duration of development, the site is expected to come forward through a planning application supported by Parameter Plans and a Design Code, which will establish the development framework, inform environmental assessment and guide future Reserved Matters applications. An illustrative masterplan may support this process, but would remain indicative rather than for approval. Requiring a site-wide masterplan to be agreed prior to the determination of planning applications would introduce an unnecessary stage that could delay submission of an application without providing additional planning benefit. The policy should instead recognise that the development framework will be established through the planning application process, with Parameter Plans and the Design Code providing the primary mechanisms for guiding future development. This approach would maintain appropriate flexibility, avoid prejudicing the consideration of future applications, and better reflect the delivery strategy for a project of this scale and complexity. This is best achieved through combining paragraphs 2 and 3 of the policy. On that basis, it is suggested that paragraph of the policy is removed and paragraph 3 expanded to capture the intention of both paragraphs.	*~~"A site wide Masterplan will be prepared by the landowners and/or promoters in conjunction with the Council and in consultation with the local community and other stakeholders. The Masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 37 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The Masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the Council)."~~*
Paragraph 3	*"Given the scale and long term construction of the development, a site wide Place Book shall be prepared to establish the vision, place-making objectives and quality expectations for the new community and provide the foundation for the site wide Masterplan and Design Codes. The Design Code will ensure that each phase of development positively contributes towards the high-quality placemaking outcomes expected".*	The current drafting of these paragraphs and supporting information is inconsistent and unclear. It suggests (much like the masterplanning process) that the Place Book will be prepared and agreed with the Council prior to the submission of an application, in order to inform the Parameter Plans and Design Code. As per the response to paragraph 2, Hill consider it inappropriate to require the approval of a masterplan before the submission of an outline application. Hill consider this to be an unnecessary step that will have the effect of delaying the submission of the application, without adding any	Paragraph 3: *"Given the scale and long term construction of the development, a site wide Place Book shall be prepared to establish the vision, place-making objectives and quality expectations for the new community and guide future Reserved Matters applications. The Place Book ~~provide the foundation~~*

Paragraph 24(b) Supporting Text Paragraph 3.2.5	*"A place book including strategic design codes and parameter plans, to fix key site requirements such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment;* *"The place book will provide the foundation for subsequent spatial planning and design work, informing the preparation of a site-wide Masterplan, together with parameter plans, a Strategic Design Code, Place Briefs and Detailed Design Codes. These documents will translate the vision, principles and outcomes established through the Place Book into a coherent spatial structure and development framework capable of phased implementation whilst maintaining a consistent and high-quality sense of place throughout the lifetime of the development"*	benefit to the planning process. Instead, the applicant and local planning authority should work together constructively through the pre-application process, with the ultimate control being that if agreement is not reached planning permission will not be granted. The amendments to the text suggest that the parameter plans and design code can form part of the Place Book which would be submitted and approved as part of a planning application.	~~*for the site wide Masterplan*~~ *will include the Parameter Plans and Strategic Design Code and will be submitted and approved as part of any outline planning application.* ~~*The*~~ *Design Codes for future Reserved Matters Applications will ensure that each phase of development positively contributes towards the high-quality placemaking outcomes expected from the Place Book".* Paragraph 24(b): *"A place book* ~~*including*~~ *to include the strategic design codes and parameter plans,* ~~*to fix*~~ *which will include some indicative principles relating to key site* ~~*requirements*~~ *considerations such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment;* Supporting Text Paragraph 3.2.5: *"The place book will provide the foundation for subsequent spatial planning and design work through future Reserved Matters Applications. It will include parameter plans and a strategic design code to* ~~*informing the preparation of a site wide masterplan, together with parameter plans, a strategic design code, place briefs and detailed design codes. These documents will*~~ *translate the vision, principles and outcomes established through the place book into a coherent spatial structure and development framework capable of phased implementation whilst maintaining a consistent and high-quality sense of place throughout the lifetime of the development."*
Paragraph 6	*"Guided by design excellence, environmental responsibility, and long-term stewardship, Cambridge East will set new standards for sustainable, high-quality placemaking".*	The aspiration for Cambridge East to deliver a high-quality and sustainable new city district is strongly supported. However, the requirement for the development to "set new standards for sustainable, high-quality placemaking" is not considered to be appropriate or justified. The GCLP establishes the policy framework, standards and expectations against which development proposals will be assessed. The role of Cambridge East should be to deliver a development that responds positively to, and complies with, those adopted standards rather than being required to create or establish new ones. The phrase "set new standards" introduces an ambiguous and potentially moving target for the development, creating uncertainty as to the level of performance expected and the basis upon which future proposals will be judged. As one of the Plan's most significant strategic allocations, Cambridge East should undoubtedly deliver exemplary development and represent a high-quality implementation of the Plan's vision and objectives. However, the policy should focus on achieving, meeting and exemplifying the standards established through the Local Plan, rather than requiring the development to establish new benchmarks that may exceed the requirements applied elsewhere across Greater Cambridge.	*"Guided by design excellence, environmental responsibility, and long-term stewardship, Cambridge East will* ~~*set new standards for sustainable, high-quality placemaking.*~~ *deliver a high-quality, sustainable new urban quarter that exemplifies the principles and standards of the Greater Cambridge Local Plan."*
Paragraph 7(a)(ii)	*"10% of the approximately 8,000 homes as specialist accommodation (within use classes C2 or C3), particularly for older people or those with disabilities"*	The amendment proposes to remove reference to precise proportion of homes to be specialist accommodation and is necessary because the requirement is inconsistent with other policies in the Plan, such as Policy H/SH which allow schemes to provide their own evidence. In addition, Policy H/SH, which relates to specialist housing, only requires unallocated schemes to provide 10%. Given there is already a policy proposed on specialist housing, any application would be determined in that context and therefore the unjustified level of specialist housing in this policy is unnecessary. The proportion of specialist housing should therefore be removed from the policy.	"~~10% of the approximately 8,000 homes as specialist accommodation (within use classes C2 or C3), particularly for older people or those with disabilities"~~
Paragraph 7(d)	*"Each phase must deliver a mix of uses to co-locate residential uses with amenities"*	The proposed amendment is necessary to provide appropriate flexibility in the delivery of a large, phased development. Requiring every phase to deliver a mix of uses may not be practical or necessary, particularly where non-residential uses can be successfully	*"Each phase must* ~~*deliver a mix of uses to co-locate*~~ *ensure that residential uses have suitable access to other non-residential* ~~*with*~~ *amenities"*

		concentrated in accessible locations. The amended wording focuses on ensuring that residents have suitable access to amenities and services, allowing the timing and location of non-residential uses to be determined as part of the masterplanning while still supporting the creation of a sustainable and well-connected community.	
Paragraph 7(d) Supporting Text Paragraph 3.2.8	*"Provision of sports and leisure facilities, including as a minimum:* *i) A 50 metre x 10 lane regional swimming pool preferably located opposite the Ice Rink* *ii) an indoor sports hall co-located with the swimming pool as part of a new leisure hub or regional indoor sports centre* *iii) outdoor pitches provision including a range of pitches including football, youth football, rugby, hockey and cricket pitches plus changing facilities."* *"The development should contribute to wider leisure and cultural provision in Cambridge. To diversify the offer for both leisure and culture and contribute to creating spaces for creative industries to grow. This should include developers engaging with local creative production groups to provide a mix of creative work, production and leisure spaces, including provision of a community arts centre. The development of this will be supported by a number of local stakeholders. The provision of the swimming pool at Cambridge East would be delivered by the Council with S106 contributions from developers at Cambridge East predominantly for a 4-lane 25 metre swimming pool Proposed Submission Local Plan 2024 – 2045contribution to the 10-lane regional swimming pool located at Cambridge East. This would also be part funded by S106 contributions from across Cambridgeshire and third party funding, such as Sport England."*	Hill note that the evidence base suggests that there is a regional need for an Olympic sized swimming pool, plus more local needs for indoor and outdoor sports provision. It was anticipated that the site would accommodate facilities for sports and that this would be established through the masterplanning process in accordance with any up-to-date evidence of need at the time the application is submitted. Hill do not necessarily object to the inclusion of a swimming pool in the scheme, but it is too early in the design process to be prescriptive, especially to refer to specific size dimensions and suggest a preferred location ahead of wider masterplanning. Hill endorse the additional supporting text which confirms that the swimming pool would be part funded by S106 contributions from other development and third party funding.	Paragraph 7(d): *"Provision of sports and leisure facilities, ~~including as a minimum~~ which may include:* *i. A ~~50 metre x 10 lane regional~~ swimming pool ~~preferably located opposite the Ice Rink~~* *ii. an indoor sports hall ~~co-located with the swimming pool as part of a new leisure hub or regional indoor sports centre~~* *iii. outdoor pitches provision including a range of pitches including football, youth football, rugby, hockey and cricket pitches plus changing facilities."* Supporting Text Paragraph 3.2.8: *"The development should contribute to wider leisure and cultural provision in Cambridge. To diversify the offer for both leisure and culture and contribute to creating spaces for creative industries to grow. This should include developers engaging with local creative production groups to provide a mix of creative work, production and leisure spaces, including provision of a community arts centre. The development of this will be supported by a number of local stakeholders. The provision of the swimming pool at Cambridge East would be delivered by the Council with S106 contributions from developers at Cambridge East ~~predominantly for a 4-lane 25 metre swimming pool contribution to the 10-lane regional swimming pool located at Cambridge East.~~ This would also be part funded by S106 contributions from across Cambridgeshire and third party funding, such as Sport England."*
Paragraph 7(e)	*"Provision of a regional cultural hub that will complement and not compete with Cambridge city centre. This will include but not be limited to provision of a creative hub comprising a mix creative work, production and leisure spaces, and a community arts centre"*	The current wording of this paragraph is overly prescriptive and provides an unnecessary level of detail in terms of what the regional cultural hub will comprise. The principle of the regional cultural hub is accepted, but the proposed amendment seeks to retain flexibility around what that regional cultural hub 'may' contain.	"*Provision of a ~~regional~~ cultural ~~hub~~ facilities that will complement and not compete with Cambridge city centre. This may ~~will~~ include but not be limited to provision of a creative hub comprising a mix creative work, production and leisure spaces, and a community arts centre"*
Paragraph 7(f)	*"A range of supporting services and facilities to meet the day-to-day needs of those living, working, visiting, travelling through and attending education there, including cultural, leisure, nursery, primary and secondary schools, health, community and library space, faith and retail uses. These uses will be delivered at a series of walkable and wheelable neighbourhood centres"*	Figure 53 – the Indicative Spatial Framework for S/CE: Cambridge East – identifies indicative locations for 'local' centres to be delivered as part of the development. Therefore, this proposed amendment is suggested to ensure wording is consistent with the intention of the policy and the terminology used is aligned throughout.	"*A range of supporting services and facilities to meet the day-to-day needs of those living, working, visiting, travelling through and attending education there, including cultural, leisure, nursery, primary and secondary schools, health, community and library space, faith and retail uses. These uses will be delivered at a series of walkable and wheelable ~~neighbourhood~~ local centres*"
Paragraph 9(a)	*"Create a well-considered eastern approach to Cambridge that:* *a. Is sensitive to local townscape, landscape, strategic views, dynamic views and heritage assets, including the rural setting of the village of Teversham, the Teversham Conservation Area and the wider countryside to the east"*	The proposed amendment is necessary to reflect the realities of delivering a development of the scale envisaged at Cambridge East. While the scheme will seek to minimise adverse effects and respond positively to its context, it is inevitable that a new urban quarter of approximately 8,000 homes and commercial floorspace will result in some change to local townscape, landscape character, strategic and dynamic views, and the setting of heritage assets. These matters will be carefully considered and assessed through detailed landscape, visual and heritage assessments submitted with future applications. Replacing "is sensitive to" with "considers" provides a more realistic and proportionate policy requirement.	"*Create a well-considered eastern approach to Cambridge that:* *~~a. Is sensitive to~~ Considers local townscape, landscape, strategic views, dynamic views and heritage assets, including the rural setting of the village of Teversham, the Teversham Conservation Area and the wider countryside to the east"*
Paragraph 10(a) and (e)	*"Establish a strategy for the conservation and enjoyment of the historic environment which:*	Hill endorse the amendments to the wording of paragraph 10(a) which now ensure that the retention of any historic buildings (beyond the control and office building) is determined based on a thorough assessment of their heritage significance through a planning application. Hill seek further clarity in the text to ensure that the 'at least'	*"a. Celebrates and integrates heritage assets, including ~~at least~~ the control and office building and its setting, and considers the retention, adaptation or other appropriate treatment of any other ~~historically~~*

	a. Celebrates and integrates heritage assets, including at least the control and office building and its setting, and any other historically significant buildings…. *e. delivers viable and sustainable uses consistent with their conservation"*	reference is read separately to 'any other historically significant building' to avoid any misinterpretation. The text should provide clarity that the retention of anything beyond the control and office building will be subject to thorough assessment. Paragraph 10(e) implies that all buildings with historic interest will be reused, i.e. 'consistent with their conservation' rather than allowing for the optimum approach to be identified through the balancing of a variety of planning factors. The text should allow for buildings to be removed if it is deemed that removal forms part of the optimum approach once a thorough assessment has been undertaken.	*~~significant~~ buildings identified through detailed assessment as having heritage significance."* *"e. delivers viable and sustainable uses ~~consistent with their conservation~~ for retained heritage assets, where appropriate, having regard to their significance and the findings of a detailed heritage assessment."*
Paragraph 12(c) Supporting Text Paragraph 3.2.10	*"Through the masterplan for the site, agree an appropriate scale, layout and density of development that:* *c. creates and, where appropriate, reinforces local character and architectural quality, providing smooth, well-designed transitions in scale to respect and complement the surrounding context"* *"The policy sets out clear expectations for placemaking and the elements needed to deliver an exemplar development. Achieving a sensitive relationship between this site and its context will require careful consideration, recognising both the scale of opportunity, but also the need to respond to the existing townscape and landscape, including integrating well with Marleigh and Springstead Village, and being sensitive to retained historic assets on the site, the setting of Teversham Conservation Area, and with the wider townscape and landscape. Development should be of a density to support liveability while enforcing local character and architectural quality, ensuring taller buildings make a positive contribution to the Cambridge skyline in line with the Greater Cambridge Skyline and Tall Buildings Strategy."*	Amendment is proposed to the first line of paragraph 12 on the basis that it is entirely inappropriate to produce a masterplan that will be agreed with the Council, ahead of any planning application, and for that masterplan to guide future applications. The amendment, therefore, seeks to remove the reference to agreeing a masterplan for the site, whilst retaining the detail of the policy that is seeking to ensure appropriate scale, layout and density of the proposed scheme are developed through the application. As currently drafted, Policy S/CE seeks the delivery of a new urban quarter comprising approximately 8,000 homes alongside a significant amount of non-residential floorspace to support employment and the needs of the local and wider community. Hill note that the policy describes these figures as "approximately", and has suggested that this is amended to "a minimum of" to recognise the opportunity of optimising the site having regard to the new station. In that context, the scale, strategic importance and highly sustainable location of the Site means future development will inevitably result in a notable change from the character and scale of parts of the surrounding area. Whilst the application will seek to respond positively to adjacent existing development and sensitive site boundaries, it will not always be possible to achieve a 'smooth' transition in scale, height, massing or density across all edges of the development that 'enforces local character'. In particular, areas around the proposed new station and district centre will require a more urban form of development to optimise the use of land and support sustainable growth. The policy should therefore recognise the need for transitions to be appropriately managed and justified, rather than requiring them to be smooth in all circumstances. These representations also pick up concerns with the approach to the Skyline and Tall Buildings Strategy and so it is proposed that this reference is deleted from the policy.	Paragraph 12: *~~Through the masterplan for the site, agree an~~ Develop an appropriate scale, layout and density of development that*: *"c. creates and, where appropriate, reinforces local character and architectural quality, providing ~~smooth,~~ well-designed transitions in scale to respect and complement the surrounding context."* Supporting Text Paragraph 3.2.10: *"The policy sets out clear expectations for placemaking and the elements needed to deliver an exemplar development. Achieving a sensitive relationship between this site and its context will require careful consideration, recognising both the scale of opportunity, but also the need to respond to the existing townscape and landscape, including integrating well with Marleigh and Springstead Village, and considering ~~being sensitive to~~ retained historic assets on the site, the setting of Teversham Conservation Area, and with the wider townscape and landscape. Development should be of a density to support liveability ~~while enforcing local character~~ and architectural quality, ensuring taller buildings make a positive contribution to the Cambridge skyline ~~in line with the Greater Cambridge Skyline and Tall Buildings Strategy.~~"*
Paragraph 13	*"Through the masterplan for the site, agree appropriate variation in building form, scale, height, massing, and density to shape a distinctive city district by:* *a. providing taller buildings in appropriate locations to mark key spaces, enhance wayfinding and complement the Cambridge skyline"*	As per the approach for paragraph 12, amendment is proposed to the first line of paragraph 13 on the basis that it is entirely inappropriate to produce a masterplan that will be agreed with the Council, ahead of any planning application, and for that masterplan to guide future applications. The amendment, therefore, seeks to remove the reference to agreeing a masterplan for the site, whilst retaining the detail of the policy that is seeking to ensure appropriate scale, layout and density of the proposed scheme are developed through the application. These representations separately consider the implications of the Skyline and Tall Buildings policy on development at Cambridge East (please refer to Section 4). The reference to "providing taller buildings in appropriate locations" is supported, but the policy should more clearly acknowledge that Cambridge East is one of the most appropriate locations in Greater Cambridge for a substantial concentration of higher-density development and tall buildings. Given the scale of the allocation, its urban character, accessibility and strategic importance to housing delivery, the policy should positively support the use of taller buildings across a range of locations identified through the masterplanning process, rather than framing height as a limited or exceptional intervention. A more positive and enabling approach would better reflect the role Cambridge East is expected to play as a major new urban quarter and would provide the flexibility necessary to optimise the site's contribution to meeting Greater Cambridge's development needs.	*"~~Through the masterplan for the site, agree~~ Demonstrate appropriate variation in building form, scale, height, massing, and density to shape a distinctive city district by:* *a. providing taller buildings including in appropriate locations to mark key spaces, enhance wayfinding and complement the Cambridge skyline"*
Paragraphs 11 and 14	*Adopt a distinctive approach to urban design which:* *a. promotes the highest standards of sustainability and liveability"* *"Use the highest quality materials and detailing to ensure durability, environmental performance and design excellence, supporting climate resilience"*	The use of the term 'highest' could be viewed as ambiguous. It is the purpose of the Plan to set the standards for development within Greater Cambridge and then the purpose of the site-specific policies is to achieve the Plans' standards. The use of the term 'highest' could suggest an expectation to go beyond the standards of the Plan. Whilst standards of sustainability, liveability and the quality of materials will be key considerations as part of the masterplanning exercise and the outline application, the	Paragraph 11: *Adopt a distinctive approach to urban design which:* *a. promotes ~~the highest~~ high standards of sustainability and liveability"* Paragraph 14:

		policy should ensure that standards proposed in the application are assessed against policies in the Plan as a whole when determining the application. It is suggested that paragraphs 11 and 14 are amended to ensure future compliance with other policies in the Plan.	*"Use ~~the highest~~ high quality materials and detailing to ensure durability, environmental performance and design excellence, supporting climate resilience"*
Paragraph 15 Supporting Text Paragraph 3.2.13 Supporting Text Paragraph 3.2.14	*"Deliver an eastwards extension to Coldham's Common using the Green Belt corridor, which must:"* *"As envisaged in the Cambridge East AAP including the inspector's report, the ultimate boundaries of the Green Belt in this area are expected to be an output of a masterplanning exercise, which has yet to be completed. As such, the current boundaries of the Green Belt corridor will remain unchanged in this Local Plan but, following completion of the masterplan-planning exercise, precise boundaries to reflect the masterplan will be confirmed via a review of the Local Plan. In the event that the masterplanning exercise is completed and a planning application for development affecting the green corridor is made before the conclusion of a review of the Local Plan, any development within the corridor will be determined having regard to extant development plan and Green Belt policy.* *"If it is demonstrated via the masterplanning process that locating some development within the retained Green Belt corridor is necessary to achieve high quality placemaking, this may amount to a consideration that could in principle contribute to a finding of very special circumstances to justify grant of planning permission for that development. In such a case, it will be necessary to show, as part of any planning application, that the function of the Green Belt corridor is maintained or enhanced. Should the masterplan result in development encroaching on the current Green Belt corridor, there may be a requirement for additional widening of the corridor elsewhere in order to maintain the Green Belt function of the corridor. The physical boundaries of the Green Belt corridor should be considered and determined through the masterplanning exercise"*	The proposed amendment removes references that imply the green corridor must be secured through a Green Belt designation and instead confirms that its extent, alignment, width and function should be determined through the masterplanning process. This approach provides greater certainty and flexibility for the delivery of Cambridge East, recognising that the corridor's objectives can be secured through the allocation policy and subsequent planning applications without the need for an additional Green Belt designation. As set out in previous representations, Hill do not consider that the proposed corridor fulfils the purposes of the Green Belt set out in the NPPF and therefore continue to challenge the principle of its designation as Green Belt. The policy should therefore focus on maintaining or enhancing the corridor's strategic function rather than prescribing fixed boundaries or requiring additional widening elsewhere if the alignment evolves through the masterplanning process. Imposing such requirements would unnecessarily constrain the design process and prejudge its outcomes. The key consideration should be whether the overall function and effectiveness of the corridor are maintained or enhanced, with the detailed extent and configuration informed by evidence-led masterplanning and placemaking objectives.	Paragraph 15: *"Deliver an eastwards extension to Coldham's Common using the green ~~Belt~~ corridor, which must:"* Supporting Text Paragraph 3.2.13: *"As envisaged in the Cambridge East AAP including the inspector's report, the ultimate boundaries of the ~~Green Belt~~ green corridor in this area are expected to be an output of a masterplanning exercise, which ~~has yet to~~ will be completed as part of the planning application. As such, the ~~current~~ precise alignment, extent and boundaries of the green ~~Belt~~ corridor will be determined through the masterplanning exercise and secured through subsequent planning permissions. ~~remain unchanged in this Local Plan but, following completion of the masterplan-planning exercise, precise boundaries to reflect the masterplan will be confirmed. via a review of the Local Plan. In the event that the masterplanning exercise is completed and a planning application for development affecting the green corridor is made before the conclusion of a review of the Local Plan, any development within the corridor will be determined having regard to extant development plan and Green Belt policy."~~* Supporting Text Paragraph 3.2.14: *"If it is demonstrated through the masterplanning process that adjustments to the alignment or extent of the green corridor are necessary ~~locating some development within the retained Green Belt corridor is necessary~~ to achieve high-quality placemaking, ~~this may amount to a consideration that could in principle contribute to a finding of very special circumstances to justify the grant of planning permission for that development. In such a case,~~ it will be necessary to demonstrate, as part of any planning application, that the function of the ~~Green Belt~~ corridor is maintained or enhanced. ~~Should the masterplan result in development encroaching on the current Green Belt corridor, there may be a requirement for additional widening of the corridor elsewhere in order to maintain the Green Belt function of the corridor. The physical boundaries of the Green Belt corridor should be considered and determined through the masterplanning exercise"~~*
Paragraph 16(c) Supporting Text	*"Create a strong and varied framework of green infrastructure throughout the development that optimises biodiversity value and connects to existing habitats and green infrastructure in the surrounding area, including:* *c. Connecting to and providing green infrastructure beyond the site that will meet the needs of all ages and abilities and mitigate recreational pressure arising from the development on more sensitive sites including Wilbraham Fen SSSI and Stow-Cum-Quy SSSI…. "* *"The recreational demands for green spaces arising from residents and workers at Cambridge East will be significant. Responding to this, the policy requires provision of green*	The requirement to create a strong and varied framework of green infrastructure is supported. However, criterion (c) should be amended because it implies that the development itself will be able to "provide green infrastructure beyond the site". Whilst the development can deliver green infrastructure within the allocation and create physical connections to the surrounding green infrastructure network, it cannot guarantee the provision of green infrastructure on land outside the applicant's control. The current wording therefore imposes an obligation that may not be capable of being delivered by the development alone. The policy should instead recognise that Cambridge East can support and facilitate the delivery of a wider strategic green infrastructure network through the provision of connections, safeguarded routes, financial contributions where appropriate, and collaborative working with relevant landowners and public bodies. This would more	Paragraph 16: *"Connecting to and ~~providing~~ facilitating the delivery of green infrastructure beyond the site, where appropriate, to meet the needs of all ages and abilities and to mitigate recreational pressure arising from the development on more sensitive sites including Wilbraham Fen SSSI and Stow-cum-Quy SSSI."* Supporting Text Paragraph 3.2.15: *"In addition, to provide for recreational demands arising from residents and workers here – in particular to limit additional recreational pressure on*

Paragraph 3.2.15	*infrastructure throughout the site. In addition, to provide for recreational demands arising from residents and workers here – in particular to limit additional recreational pressure on the nearby Wilbraham Fen SSSI and Stow-cum-Quy SSSI - there is a need to provide recreational routes of different lengths for walking, wheeling and riding in all directions adjacent to development at Cambridge East. The green corridor will play a key role in meeting such needs but there is also a need to enable routes in other directions adjacent to the site. Beyond this, and noting the need to avoid directing significant numbers of visitors to Wilbraham Fen, the main opportunity to provide strategic scale off site green space is to the north of the A14, associated with the Wicken Fen Vision. The National Trust is setting out clear plans to deliver green connections and space around Anglesey Abbey to deliver on this Vision in the coming years. The policy therefore requires development both to make a clear recreational connection towards that area, and to contribute financially towards the project, noting that the land in this area is beyond the control of the landowner at Cambridge East"*	accurately reflect the role that the development can play in helping to establish wider recreational and ecological mitigation measures whilst ensuring that policy requirements remain capable of implementation. This should also be consistent in the supporting text – paragraph 3.2.15 states that there is a need to 'provide' recreational routes of different lengths adjacent to development at Cambridge East. Anything beyond the boundaries of the Site would be out of the Applicants' control and so the provision of these routes could not be guaranteed.	*the nearby Wilbraham Fen SSSI and Stow-cum-Quy SSSI - there is a need to ~~provide~~ facilitate recreational routes of different lengths for walking, wheeling and riding in all directions adjacent to development at Cambridge East."*
Paragraph 17(b)(ii), (iii) and (v)	*"b. Setting aside land for and directly delivering the following physical transport measures within the site:* *ii. Upgraded active travel infrastructure along Coldham's Lane;* *iii. A high-quality public transport route through the site that connects the relocated Newmarket Road Park and Ride with the city centre, serving Springstead Village and other mobility hubs at the district and neighbourhood centres within the site, and that is designed to be capable of integration with a new Cambridge East railway station; and* *v. A network of delivery and consolidation hubs and a last mile delivery system."*	In relation to criteria (ii) Coldham's Lane is located beyond the site boundary and any improvements will require engagement with third parties and the delivery of wider network interventions. It is therefore more appropriately categorised as an off-site transport measure within Section C rather than an on-site infrastructure requirement. For criteria (iii), the policy should better reflect the emerging transport strategy for Cambridge East and the opportunities presented by the confirmed railway station and future mobility hubs. The current drafting does not adequately recognise the need for an integrated movement network capable of responding to future transport innovations and changes in travel behaviour. A more flexible and future-proofed approach would focus on delivering a high-quality public transport route through the development that connects key destinations, integrates with Cambridge East station and serves the principal neighbourhood centres and mobility hubs across the new district. This would better align with the concept of a genuinely integrated and coordinated transport network. The term 'neighbourhood' has also been amended to 'local' to reflect the terminology and intention across the remainder of the policy and the Indicative Spatial Framework. For criteria (v), some minor proposed tweaks to the wording are proposed to enable flexibility of delivery.	*"b. Setting aside land for and directly delivering the following physical transport measures within the site:* *~~ii. Upgraded active travel infrastructure along Coldham's Lane;~~* [MOVED TO PARA 17(C)] *iii. A high-quality public transport route through the site that connects the ~~relocated Newmarket Road Park and Ride with the city centre, serving~~ new Newmarket Road Travel Hub with Coldhams Lane, Springstead Village and other mobility hubs at the district and ~~neighbourhood~~ local centres within the site, and that is designed to be capable of integration with a new Cambridge East railway station; and* *v. ~~A network of~~ Delivery and consolidation hub or hubs and a last mile delivery system."*
Paragraph 17(c)	*"c. Making financial contributions towards and, as appropriate, enabling the following transport measures external to the site:* *i. Relocation of Newmarket Road Park and Ride to a site south of Newmarket Road and east of Airport Way.* *ii. Cambridge Eastern Access Phase A* *iii. A package of bus service enhancements, or other public transport modes where appropriate, connecting the site with North East Cambridge, West Cambridge, Cambridge City Centre, Cambridge railways station and Cambridge Biomedical Campus;* *iv. A high-quality public transport scheme, linking the high-quality public transport route within the site to the city centre;* *v. Active travel enhancements to wider connections linking with key destinations, including: Cambridge Station, City Centre and onwards to West Cambridge and wider destinations on radial high quality public transport corridors; and (HQPT); Cambridge Regional College, North East Cambridge and Cambridge North Station; Cambridge Biomedical Campus, Cambridge South Station and Cambridge Leisure site."*	For schemes of the scale and complexity of Cambridge East, it may sometimes be more appropriate to act as facilitator or undertake delivery, in which case a contribution may not be appropriate. On that basis the change from "and" to "or" would enable the appropriate mechanism to be determined. For criteria (i), some minor tweaks to the wording are suggested to acknowledge the creation of a Travel Hub to a site south of Newmarket Road and east of Airport Way. Criteria (ii) should be deleted on the basis that Cambridge Eastern Access Phase A has been confirmed as fully funded by the GCP. Criterion (iii) and (iv) require provision of the same public transport connection with the City Centre, so it is proposed that criteria (iv) is deleted to avoid repetition.	*"c. Making financial contributions towards or ~~and~~, as appropriate, enabling the following transport measures external to the site:* *i. New Newmarket Road Travel Hub including relocation of Newmarket Road Park and Ride to a site south of Newmarket Road and east of Airport Way.* *~~ii. Cambridge Eastern Access Phase A~~* *iii. A package of bus service enhancements, or other public transport modes where appropriate, connecting the site with North East Cambridge, West Cambridge, Cambridge City Centre, Cambridge railways station and Cambridge Biomedical Campus;* *~~iv. A high-quality public transport scheme, linking the high-quality public transport route within the site to the city centre;~~* *v. Active travel enhancements to wider connections linking with key destinations, including: Cambridge Station, City Centre and onwards to West Cambridge and wider destinations on radial high quality public transport corridors; and (HQPT); Cambridge Regional College, North East*

			Cambridge and Cambridge North Station; Cambridge Biomedical Campus, Cambridge South Station and Cambridge Leisure site; vi. *Upgraded active travel infrastructure along Coldham's Lane."*
Paragraph 18 Supporting Text Paragraph 3.2.16	*"The agreed masterplan for the site must demonstrate how:* *b. The quantum and mix of development can be delivered within the agreed trip budget. A definitive trip budget based on detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application. 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."* *The policy sets out expectations to enable movement around the new city district and beyond to destinations such as Cambridge city centre, without overburdening the existing network and in a sustainable way. It is imperative that the mix of development supports an intergenerational community and achieves optimal transport outcomes including high levels of site and city trip internalisation and high active and public transport mode shares. The vehicular 'trip budget' referred to in the policy is a critical tool for achieving this. The indicative trip budget is approximately 1,500 trips in the AM peak and 1,800 trips in the PM peak. The trip budget will be refined as more detailed evidence is completed, and a strategic and local transport mitigation plan must be prepared to demonstrate the necessary measures for the development to achieve the resultant sustainable travel mode shares. Among other elements, this transport mitigation plan must include a parking strategy to demonstrate appropriate provision of cycle and car parking, including models of operation, such as rental of residential car parking to discourage private car ownership, and the accommodation of micromobility parking at key locations. It is noted that extant trip making from the site can be used to support a first phase of development. Monitoring will ensure full accountability and if necessary further mitigation, or refocussed mitigation which may be needed to ensure that overall compliance with the trip budget is achieved. The full detail of these mechanisms will be established in the S106 obligations entered into on the grant of outline consent.*	As per the approach for paragraphs 12 and 13, amendment is proposed to the first line of paragraph 18 on the basis that it is entirely inappropriate to produce a masterplan that will be agreed with the Council, ahead of any planning application, and for that masterplan to guide future applications. The site promoters have 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 supporting text to state the exact numbers, or for that trip budget to be determined ahead of the outline application. Hill are concerned that pre-determining the trip budget ahead of an application (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. Hill 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 or agreed separately from the application process.	Paragraph 18: *"The ~~agreed masterplan~~ planning application for the site must demonstrate how:* *b. The quantum and mix of development can be delivered within ~~the agreed~~ an appropriate trip budget. A definitive trip budget based on detailed evidence must be agreed with the Local Highways Authority ~~prior to submission~~ as part of the outline application. 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.* Supporting Text Paragraph 3.2.16: *"The policy sets out expectations to enable movement around the new city district and beyond to destinations such as Cambridge city centre, without overburdening the existing network and in a sustainable way. It is imperative that the mix of development supports an intergenerational community and achieves optimal transport outcomes including high levels of site and city trip internalisation and high active and public transport mode shares. The vehicular 'trip budget' referred to in the policy is a critical tool for achieving this. ~~The indicative trip budget is approximately 1,500 trips in the AM peak and 1,800 trips in the PM peak.~~ The trip budget will be ~~refined~~ agreed as part of the outline planning application when more detailed evidence is completed, and a strategic and local transport mitigation plan must be prepared to demonstrate the necessary measures for the development to achieve the resultant sustainable travel mode shares. Among other elements, this transport mitigation plan must include a parking strategy to demonstrate appropriate provision of cycle and car parking, including models of operation, such as rental of residential car parking to discourage private car ownership, and the accommodation of micromobility parking at key locations. It is noted that extant trip making from the site can be used to support a first phase of development. Monitoring will ensure full accountability and if necessary further mitigation, or refocussed mitigation which may be needed to ensure that overall compliance with the trip budget is achieved. The full detail of these mechanisms will be established in the S106 obligations entered into on the grant of outline consent."*
Paragraph 19	*"To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer for agreement with the Local Highways Authority and Local Planning Authority. This must include…"*	The requirement for a strategic and local transport mitigation plan is supported in principle. However, the policy should better recognise the current position whereby key elements of the wider transport strategy for Greater Cambridge continue to evolve. A number of strategic transport interventions that may ultimately support Cambridge East and wider growth across the city have not yet been fully defined, tested, funded or committed to delivery. In these circumstances, it may not be possible at the point of determining an application for Cambridge East to present a fully formed transport mitigation plan addressing every strategic intervention that may emerge through subsequent transport planning work.	*"~~To support delivery of the agreed masterplan, a~~ A strategic and local transport mitigation plan must be prepared by the developer as part of the planning application for agreement with the Local Highways Authority and Local Planning Authority. The plan shall be informed by the transport vision for the development and the wider transport strategy for Greater Cambridge and may be refined through a vision and validate approach, supported by monitoring and phased implementation, as further*

		The policy should instead acknowledge that transport interventions and mitigation will be identified and refined through a vision and validate approach. This is a widely accepted and well-established methodology for major developments delivered over an extended period, both in Cambridge at Waterbeach and nationally, recognising that transport behaviours, infrastructure requirements and strategic investment priorities evolve throughout the lifetime of a scheme. The approach establishes a clear transport vision and mode share aspirations at the outset, with the effectiveness of interventions then monitored, validated and refined over time to ensure that outcomes are achieved. For a strategic allocation of at least 8,000 homes that will be delivered over several decades, this approach is likely to be both more effective and more realistic than seeking to define all transport mitigation measures at the initial planning application stage. This would also align with NPPF Policy TR6, which requires transport assessments to reflect both the transport vision for the development and the transport strategy for the area in which it is located, including how these are intended to be achieved. Importantly, the policy framework recognises that transport assessments are informed by a strategic direction and intended outcomes, rather than requiring all transport interventions to have been fully specified in advance. Where elements of the wider Greater Cambridge transport strategy remain under development, Cambridge East can only reasonably be expected to demonstrate consistency with the prevailing vision and evidence base available at the time. As per amendments to other parts of the policy, the requirement to agree a masterplan is wholly inappropriate and should be deleted. Therefore, a strategic and local transport mitigation plan will be submitted as part of the planning application and the policy should not be interpreted as requiring all strategic transport interventions or mitigation measures to be fully identified and agreed prior to determination. The policy should instead provide flexibility for mitigation measures to be developed through an iterative vision and validate process, supported by monitoring, review and phased implementation. This would ensure that the allocation remains deliverable whilst allowing transport solutions to respond to changing circumstances, emerging evidence and future strategic transport investment across Greater Cambridge.	*evidence and strategic transport interventions emerge. This must include:"*
Paragraph 20(c)	*"Masterplanning and development delivery must realise the strategic opportunity presented by Cambridge East railway station by ensuring that it:* *c. Aligns the district centre and surrounding higher-density mixed use development to achieve high levels of accessibility to a potential station location"*	The current wording could be interpreted as requiring the district centre to be directly aligned with, or immediately adjacent to, the station. The intention is to secure a strong relationship with the station whilst allowing flexibility for the precise location and configuration of the district centre to emerge through the application process, therefore the proposed amendment just provides clarity of that intention.	*"Masterplanning and development delivery must realise the strategic opportunity presented by Cambridge East railway station by ensuring that it:* *c. ~~Aligns~~ Enables the district centre and surrounding higher-density mixed use development ~~are~~ to be located and designed to achieve high levels of accessibility to a potential station location"*
Paragraph 23	*"Conditions are likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the LPA is satisfied that there is scope for earlier development."*	Whilst Hill recognise the importance of strategic water supply interventions, including the Grafham Transfer scheme, water resource constraints are not an issue specific to Cambridge East and therefore do not warrant policy wording within the site allocation. The matter is a strategic consideration that affects the delivery of growth across Greater Cambridge and should be addressed consistently through the wider policy framework rather than through allocation-specific restrictions. The wording also fails to recognise that the site currently benefits from an existing water supply associated with its operational uses. The redevelopment of the site should be capable of utilising this existing baseline demand to facilitate the delivery of early phases of development, subject to the agreement of the relevant statutory undertakers and regulators. The policy should therefore avoid implying that development cannot commence, or that occupations should automatically be restricted, until the completion of a particular strategic intervention. Such matters should be assessed on the basis of the evidence available at the time, taking account of existing consumption, demand management measures, strategic infrastructure improvements and the advice of Cambridge Water and the Environment Agency.	*~~"Conditions are likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the LPA is satisfied that there is scope for earlier development."~~*
Paragraph 24	*24. In addition to the requirements of the validation checklist, the following will be required at the submission of an outline or major planning application:* *a. An overall masterplan, setting out the final capacity and mix of uses on site and demonstrating how the proposed development meets the requirements set out in this policy;*	As per comments throughout the policy, any masterplan prepared in relation to the site will be for illustrative purposes only. This amendment to the text in criteria (a) therefore clarifies the status of the masterplan. The inclusion of the words *"within limits of deviation"* in criteria (b) is necessary to provide an appropriate degree of flexibility for a development of the scale, complexity	*24. In addition to the requirements of the validation checklist, the following will be required at the submission of an outline or major planning application:* *a. An overall illustrative masterplan, ~~setting out the final capacity and mix of uses on site and~~*

	b. *A place book including strategic design codes and parameter plans, to fix key site requirements such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment;* c. *Parameter plans, to fix key site requirements such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment*	and build-out period envisaged at Cambridge East. Whilst strategic design codes and parameter plans should establish the key development principles and define the broad framework for the Site, it is neither practical nor desirable to fix all elements without any scope for refinement. Allowing for limits of deviation reflects established practice for large-scale outline planning permissions and ensures that detailed design, technical requirements, evolving evidence and changing circumstances can be accommodated through subsequent applications, whilst remaining consistent with the approved strategic framework and overall vision for the Site. Criteria (c) should be deleted on the basis that it repeats the requirement for parameter plans which are already listed in criteria (b).	*demonstrating for indicative purposes how the proposed development meets the requirements set out in this policy;* b. *A place book ~~including~~ to include the strategic design code and parameter plans, ~~to fix~~ which will include some indicative principles relating to key site ~~requirements~~ considerations such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment;* ~~c. Parameter plans, to fix key site requirements such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment~~
Paragraph 25	*"The masterplan and strategic design code will be subject to community and other stakeholder engagement and critical review by the Cambridgeshire Quality Panel (or successor body) as part of their development and refinement."*	As per comments throughout the policy, any masterplan prepared in relation to the site will be for illustrative purposes only. This amendment to the text therefore clarifies the status of the masterplan to be discussed with the Cambridgeshire Quality Panel.	*"The illustrative masterplan and strategic design code will be subject to community and other stakeholder engagement and critical review by the Cambridgeshire Quality Panel (or successor body) as part of their development and refinement."*
Paragraph 26	*"Subsequent reserved matters applications for full planning permission will only be determined once the supporting strategies have been approved, and future applications will need to demonstrate compliance with these strategies and the outline approval. More focussed design codes for specific neighbourhoods should be prepared and submitted as part of the reserved matters applications, in line with any relevant conditions in the outline approval"*	This sentence of the policy should be deleted in its entirety. It seeks to prescribe the detailed process by which future reserved matters applications will be brought forward and determined, despite this being a matter more appropriately addressed through the outline planning application itself. The Local Plan should establish what Cambridge East is expected to deliver, rather than dictate how the future consenting process should operate. For a development of this scale and complexity, the approval framework will evolve through the preparation of the outline application and may include a range of supporting strategies, design codes, approval stages and governance arrangements. The precise form of those mechanisms cannot be determined at the plan-making stage and should not be constrained by strategic policy wording. The relevant text should therefore be removed, allowing the consenting framework to be established through the outline planning application and any associated conditions and obligations.	~~*"Subsequent reserved matters applications for full planning permission will only be determined once the supporting strategies have been approved, and future applications will need to demonstrate compliance with these strategies and the outline approval. More focussed design codes for specific neighbourhoods should be prepared and submitted as part of the reserved matters applications, in line with any relevant conditions in the outline approval"*~~
NEW POLICY PARAGRAPH	N/A	The proposed amendment reinstates the site-specific viability wording from the Cambridge East AAP to ensure continuity of an established and justified policy approach as the AAP is superseded by the GCLP. Cambridge East remains a complex strategic allocation requiring substantial upfront investment in infrastructure, remediation, demolition and the relocation of existing operations, and these exceptional delivery circumstances have not materially changed since the AAP was adopted. Indeed, in light of the NPPF's increased emphasis on plan-stage viability and the limited scope for viability discussions at the decision-making stage, it is particularly important that the policy framework explicitly recognises the need for site-specific viability considerations. Retaining the AAP wording would provide a proportionate and well-tested mechanism for balancing affordable housing, infrastructure and placemaking objectives against the site's unique delivery requirements, whilst providing certainty for applicants, decision-makers and stakeholders and reflecting the realities of delivering development on this site.	*"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)."*
Supporting Text Paragraph 3.2.9	*"In addition to the above, the Greater Cambridge Infrastructure Delivery Plan (IDP) (2026) has identified that the site will require: two new primary schools with integrated nurseries; two new secondary schools; a new healthcare facility, approximately 1,250 square metres community space, and 440 square metres library space to be delivered as a key library; a fire operational drop off point; and a sports hall (4 badminton court sizes), to support the*	The proposed amendments to the supporting text remove the granularity of detail that is unnecessary at this stage. The text still ensures the principle of the uses is identified and then enables discussions to be undertaken with the relevant statutory bodies to establish the appropriate quantum of uses to be delivered.	*"In addition to the above, the Greater Cambridge Infrastructure Delivery Plan (IDP) (2026) has identified that the site will require: two new primary schools with integrated nurseries; two new secondary schools; a new healthcare facility, ~~approximately 1,250 square metres~~ community space, and ~~440 square metres~~ library space ~~to be delivered as a key~~*

	delivery of the site during the plan period and beyond. The exact quantum and phasing of infrastructure will need to be kept under review as the development comes forward, including phases beyond the plan period. This should be informed by on-going engagement with statutory bodies and undertakers."		*~~library~~; a fire operational drop off point; and a sports hall ~~(4 badminton court sizes)~~, to support the delivery of the site during the plan period and beyond. The exact quantum and phasing of infrastructure will need to be kept under review as the development comes forward, including phases beyond the plan period. This should be informed by on-going engagement with statutory bodies and undertakers."*
Supporting Text Paragraph 3.2.18	*"Notwithstanding this, any future masterplan will need to respond positively to the potential future station by safeguarding its delivery, ensuring development does not prejudice future rail infrastructure, and establishing an urban structure capable of supporting rail connectivity should it come forward. The spatial strategy and movement framework in such a masterplan must retain sufficient flexibility to integrate a future station. Higher-density mixed-use development, including the district centre, should be capable of aligning with a potential station location to the south of the allocation, supporting transit-oriented development principles while ensuring early phases operate successfully in advance of any station delivery."*	Hill strongly support the principle of the future station and ensuring that development does not prejudice its delivery. However, it is premature for the policy to prescribe the location of the district centre at this stage. Whilst the area south of the green corridor may ultimately prove to be the most appropriate location for the district centre, this should be determined through the masterplanning and planning application process, informed by movement patterns, placemaking considerations, viability, the distribution of land uses and the overall spatial strategy for the Site. The policy should therefore focus on securing a strong functional relationship between the station, district centre and higher-density development, rather than predetermining their exact locations before the necessary evidence and design work has been undertaken.	*"Notwithstanding this, any future masterplan will need to respond positively to the potential future station by safeguarding its delivery, ensuring development does not prejudice future rail infrastructure, and establishing an urban structure capable of supporting rail connectivity should it come forward. The spatial strategy and movement framework in such a masterplan must retain sufficient flexibility to retain strong connectivity to ~~integrate~~ a future station. Higher-density mixed-use development, including the district centre, should be ~~capable of aligning with a~~ planned to respond positively to a potential station location to the south of the allocation, supporting transit-oriented development principles while ensuring early phases operate successfully in advance of any station delivery."*
Supporting Text Paragraph 3.2.22	*"…The housing trajectory accompanying the plan anticipates housing completions from 2032"*	On behalf of Marshall (as previous owners of the site), information was submitted to GCSP identifying that vacant possession was anticipated in 2030, with the first delivery of homes expected in 2031/32. Since that evidence was prepared, the site has been sold and the involvement of Hill has strengthened the potential for accelerated delivery. Hill is actively exploring opportunities to bring forward development on parts of the site that do not prejudice the continued operation of the airport. Importantly, the continued operation of the airport means that significant infrastructure capacity is already available on the site, creating opportunities for early phases of development to be accommodated without reliance on the full package of infrastructure that may be required for the completed allocation. This provides further potential for housing delivery to commence in advance of 2032. As masterplanning and delivery work progresses, opportunities may emerge to advance infrastructure provision and housing delivery ahead of the trajectory currently assumed by the Plan. The Plan should therefore avoid implying that delivery before 2032 is fixed. Accordingly, the supporting text should be amended to recognise that whilst the current trajectory assumes completions from 2032, ongoing work by the landownersmand the promoter may identify opportunities to accelerate delivery and bring forward earlier housing completions where this can be achieved without prejudicing the site's operational requirements or the comprehensive development objectives of the site allocation policy.	Add some additional text to the end of this paragraph of the supporting text so that it reads: *"The housing trajectory accompanying the plan currently anticipates housing completions from 2032. However, ongoing masterplanning and delivery work may identify opportunities to accelerate development and bring forward earlier housing completions, particularly where development can proceed without affecting the continued operation of the airport and where such acceleration supports the timely delivery of new homes and associated infrastructure."*

4 Development Management Policies

Policy GP/ST: Skyline and Tall Buildings

4.1 The need to deliver growth across Greater Cambridge is well known. Government has made it clear that delivering transformational growth at Cambridge is a national priority and the GCDC has been set up to drive and accelerate the delivery of that growth.

4.2 Cambridge East represents a critical part of the development strategy for the GCLP and is also likely to play a significant role in GCDC's wider growth aspirations. It is therefore essential that development plan policies do not inappropriately limit the scale of growth and ambition for Cambridge East.

4.3 The site allocation policy for Cambridge East (Policy S/CE) specifically recognises that the development will include height and massing to create a 'distinctive city district', which will include taller buildings in appropriate locations.

4.4 Whilst Hill accept the need for new development to respond appropriately to the existing context, the policies of the GCLP should be clearly prepared in the knowledge that to achieve the scale of growth that Government aspires to, development will naturally need to be transformational and at a higher density, mass and scale than the existing context.

4.5 However, Policy GP/ST is an example of a policy which is negatively drafted and is predicated on the premise that changes to the skyline should be by exception. That fails to recognise the scale of growth and ambition that Cambridge is required to accommodate. That of course does not mean that development should be allowed to happen at the expense of any change to the skyline, but the policy should recognise that change to the skyline is, by definition of the very scale of development proposed, inevitable, and the key objective should be to ensure that any change is carefully and appropriately assessed and managed.

4.6 The policy wording, supporting text and Appendix H, do not adequately reflect the positive aspects of the evidence base report – 'Skyline and Tall Buildings Baseline, Strategy and Guidance' (hereafter known as the 'Skyline Strategy') – and instead place emphasis on the application of restrictive policy rather than policy that promotes an informed approach to consideration of height and skyline matters.

4.7 While the general urban form of Cambridge is 'subtle and a restrained skyline when viewed from most angles and distances in and around the city' (Paragraph 2.6.2 of the Skyline Strategy), tall buildings are acknowledged as characteristic and not inconsistent with the city's character, in particular around the Airport (Paragraphs 2.6.5 and 2.6.6 of the Skyline Strategy). The policy therefore needs to be framed to support the delivery of well-designed and appropriately located development. A change to the skyline could be perceived as positive and a new quarter in this part of the city could, in time itself become a valued part of the city's skyline and character, much like many of the existing features.

4.8 In this context, Hill make two primary comments on draft Policy GP/ST and its supporting text.

4.9 Firstly, Criteria 1 of the policy states that proposals that 'break' or 'result in significant change' to the existing skyline, or are significantly taller than the surrounding build form, must demonstrate how they 'maintain or enhance' the skyline and character of Cambridge.

4.10 Development at Cambridge East, a highly sustainable location supported by a new EWR station, is likely to change the existing skyline – this is an inevitable outcome that follows the optimisation of the site and supporting transformational growth across Greater Cambridge.

4.11 Cambridge East is identified in the Skyline Strategy as 'bracketing' the views of the city along with Addenbrookes, and it is noted that the site is 'distinct' from the city. As a result, the evidence indicates that a continuation of suburban development is not required and that the distinct nature of the site presents an opportunity to bring forward a proposal that should consider more ambitious development heights than the surrounding suburban development while responding appropriately to the city's character. This is not clearly reflected in the Skyline Strategy, for example Figure 27 (Tall Building Thresholds) which identifies the baseline for this part of the site as 'suburban / low rural height zone'. This fails to recognise the core proposition behind the site allocation and the significant change in circumstances that arise from the confirmation of the new Cambridge East station to the immediate south of the site. Instead height proposals for major sites should be subject to separate, detailed review.

4.12 Consequently, the 'maintain and enhance' test does not adequately reflect the circumstances of Cambridge East. The evidence base identifies the site as a distinct location from the existing city and acknowledges the opportunity for a more ambitious approach to building heights. Given the scale of development proposed, changes to the skyline and townscape character will inevitably occur. As such, requiring the existing skyline to be 'maintained' is neither realistic nor aligned with the objectives of the allocation. In addition, the term 'enhance' is highly subjective and introduces unnecessary uncertainty. The policy should instead be amended to recognise that change may occur, provided it is appropriately justified through the design process and responds positively to the site's context and Cambridge's valued character.

4.13 Secondly, the policy and the explanatory text are supported by evidence in Appendix H and the Skyline Strategy. Hill's technical team has carefully reviewed these documents and has identified as series of serious issues, including:

- The Key View study within the Skyline Strategy, places emphasis on the existing character of the city as essentially low with localised tall historic buildings in the core and more modern tall buildings to the periphery (including the Airport site) which defines the skyline. This is particularly important for Cambridge East, where the scale of the allocation and its role as a major new urban extension will necessitate a degree of flexibility in building heights to support sustainable densities, create legible centres and landmarks, and respond to the emerging transport infrastructure, whilst ensuring that any impact on the wider city skyline is appropriately assessed and managed.

- It is important to ensure matters of skyline character, visibility and historic setting are not confused - we are concerned that the matters appear to be conflated. In relation to Viewpoint K from Little Wilbraham Road, there appears to be no justification for the inclusion of that view within the set of strategic views for the Skyline Strategy and the Regulation 19 GCLP more generally. However, as set out in Appendix D of the Skyline Strategy and despite recognition of its 'illustrative nature' (Addendum to Heritage Impact Assessment (2026) - Appendix A), the view acts as a principal restriction to height at Cambridge East. As such, the elevation of View K to a strategic view in the Skyline Strategy, and subsequent integration into Appendix H and reference in Policy GP/ST 1B, is of significant concern.

- It is also important to note that Strategic Views – Heritage Impact Assessment Baseline 2021 prepared by CBA states at paragraph 1.2.3 *"… the study […] does not focus on an identified historic asset or defined group of assets […] Instead, it addresses Cambridge as a city, which is not a defined heritage asset."* Although heritage assets are advanced as reasons for limiting heights or ascribing sensitivities, heritage assessments are specifically aimed at the significance of a heritage asset, rather than the visibility of a heritage asset in a view being equated with a specific heritage sensitivity. Indeed, Historic England's guidance on setting, The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition – Dec. 2017) notes in the text box at the top right of page 7:

  "Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view."

- The Skyline Strategy does not reflect Historic England's guidance on setting. Instead, sweeping statements are made, for example under the guise of heritage assets, that contradict Historic England's guidance on setting, e.g. paragraph 2.5.3:

  "Many of the [heritage] assets contribute to the skyline of Cambridge in long distance, medium distance and close up views. In particular, the colleges and churches in and around the core are a key feature of the skyline of the City, marking its historic heart."

  The quote above has nothing to do with the significance of the heritage assets, and instead deals with the skyline of Cambridge, though this is cited under the heritage topic. The same section in the document appears to equate the visibility of taller structures with harm to heritage significance, a concept that has been dispelled in numerous appeal decisions but which appears to underpin the conclusions of the study.

  It is also noted that heritage assets are highlighted in the various view analyses. Again, this may be relevant to aspects such as the skyline and landmarks, but in most cases the significance of the heritage asset in the views are not properly appreciable. The fact that a heritage asset is visible in a view does not mean the view contributes to its heritage significance. This distinction is not covered in the Skyline Strategy or Appendix H which instead appears to imply any view containing a heritage asset must be of some sensitivity.

- The Appendix H and Skyline Strategy, identifies the area south of the green corridor as 'Suburban /Rural Height Zone 13m (4+ Rst)'. This is assumed to be founded on the Skyline Strategy document, that identifies the existing settlement as Suburban /Rural Height Zone and 'Somewhat Sensitive' to tall buildings; an adjoining an area of outline permission with agreed height parameters; and adjoining existing open space that is 'Highly Sensitive' to tall building typologies.

  However, the evidence fails to recognise that a) the 'highly sensitive' open space has tall buildings that appear in its views; b) tall buildings already exist at the Airport and c) the conscious decision to allocate significant growth at Cambridge East. Furthermore, a new

EWR station is now to be delivered in the immediate vicinity of this location and as a result there is a clear policy direction that it should support an intensification of development. The new station provides a clear foundation to secure higher densities and by implication heights, which is not reflected in the approach of Appendix H or the Skyline Strategy document.

4.14 In light of the above, Hill consider the evidence base to be fundamentally flawed in a number of respects and as a result it should not be cited in the policy or supporting text as a basis for undertaking site specific assessments in support of planning applications. If despite our views reference to the document is to be retained in policy and / or supporting text, it will need to be comprehensively amended to address the matters raised above and associated concerns.

4.15 Overall, Hill consider Policy GP/ST to be unsound as drafted, and set out at Appendix 4 the alterations required to the policy wording and the supporting text.

Policy BG/EO: Providing and enhancing open spaces

4.16 Policy BG/EO was introduced as part of the Regulation 19 process and is supported by a report prepared by LUC – 'Green Infrastructure and Open Spaces Standards Framework' Final Report June 2026. Both have been carefully reviewed by Hill and their technical team.

4.17 Hill support the principle of an open space policy to ensure that adequate and proportionate provision is made in support of new communities. However, Hill are extremely concerned that the proposed policy as drafted will undermine the successful delivery of one of, if not the, most important site allocation to the growth of Greater Cambridge.

4.18 In respect of commercial development, criteria 4 of the policy requires open space equivalent to 2 ha per 1000 employees.

4.19 Whilst Hill agree that workplace environments should support health and wellbeing, it is not appropriate for a strategic mixed-use development such as Cambridge East to require a minimum standard of greenspace for commercial / employment development.

4.20 Cambridge East is acknowledged to be one of the most sustainable locations to accommodate growth across Greater Cambridge. Consistent with national planning policy, development in these locations should be optimised. This is reinforced by the confirmation that EWR will include a station at Cambridge East. Having already been accepted as a sustainable site, the confirmation of a rail station is a step change in the density of development that should be accommodated to secure maximum benefit of the public transport opportunities it will provide.

4.21 At this early stage of the masterplanning process the precise scale of commercial development is unknown. However, consistent with Government aspirations for Greater Cambridge and in light of the availability of a rail station, Hill wish to embrace the objective to maximise economic opportunities. Hill are testing a variety of schemes including one that accommodates c4.5m sqft (NIA) of office / lab floorspace. Based on the requirements of the policy, this scenario would generate (subject to assumptions on development form and employment density) a requirement for c.42 ha of open space, which would cover (alongside the area of the office / lab development itself) approximately 45% of the site (excluding the green corridor), before any residential homes or associated community facilities are considered.

4.22 The outcomes of the policy are disproportionate and not appropriate to a strategic mixed-use site such as Cambridge East. Hill consider criteria 4 of the policy to be unsound. It should be deleted in full or express reference should be added to confirm it does not apply to Cambridge East.

4.23 For residential led development, the draft policy directs the promoter to provide a total area of 7ha per 1000 population - 3ha provided on site and 4 ha provided offsite.

4.24 The 3 ha per 1000 onsite provision broadly aligns with the Fields in Trust standard that is often applied in local plans. However, the GCLP draft policy excludes play space and food growing space from this area allowance – effectively extending the total area requirement to 4 ha per 1000 population.

4.25 Hill do not consider that the justification for play space and food growing space being separately counted due it not being 'accessible' is justified. Growing space and play provision allowances should be included in the on-site open space allowance.

4.26 Within the context of the policy requirement for 3ha per 1,000 population (including food growing and play space), Hill would also raise the following points:

- Large scale open spaces are often not conducive to "compact, walkable and sustainable urban form". As a result, for strategic sites such as Cambridge East, the open space metrics should be seen as a maximum with impact on urban form given primacy where provision of the maximum amount of open space would compromise that. The policy should explicitly recognise the need for site specific circumstances to be considered.

- Specifically in respect of Cambridge Airport, this policy (or Policy S/CE) should make it explicit that provision of space within the green corridor counts towards the on-site provision of open space.

- Provision of outdoor sport that better serves the needs of a wider range of ages and types of people (including women) should be explicitly referenced.

4.27 The scale of offsite accessible open space provision is significant and represents a potential risk to development delivery. Hill support the policy ambition for a 'no net loss of accessible open space per capita', however in its current form it places a potentially exceptional burden on development with a requirement for 4ha per 1000 population to be provided over and above the on-site requirement.

4.28 Hill suggest that a clear and proportionate policy is required that considers each project on its merits. The policy should be amended to recognise that off-site provision must be assessed on a site-specific basis and be directly relevant, necessary and proportionate to development impacts.

4.29 Hill consider it necessary that the policy be amended as explained above in order to be found sound.

Policy BG/BG: Biodiversity and geodiversity

4.30 Policy BG/BG remains fundamentally unchanged from the Regulation 18 version and therefore the points raised in Marshall's previous representations (provided as Appendix 1) in relation to the policy's inconsistency with Government guidance, still stand.

4.31 The policy requires major development to provide a minimum 20% biodiversity net gain on-site where feasible and effective, or off-site where on-site options for BNG have been evidenced and exhausted, as agreed with the LPA. Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) states that all developments are to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat, unless the development falls within one of the exemptions.

4.32 The NPPG directs 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. Consideration will also need to be given to how the policy will be implemented." (Paragraph: 006, Reference ID: 74-006-20240214).

4.33 Hill supports achieving BNG across Greater Cambridge. However, a 'blanket' BNG expectation exceeding 10% appears to contradict the NPPG, which advocates enhanced BNG delivery at a site-specific level based on its merits.

4.34 The Biodiversity and Green Spaces Topic Paper lists 8 sites in Table 1 that have achieved over 20% BNG since the mandatory requirement began. Of these, five sites have 12 units or fewer, while the remaining three involve schemes with 70, 120 dwellings, and a commercial development. Table 2 covers sites with planned BNG before the mandatory target; most are purely commercial projects without the infrastructure conflicts typical of large-scale mixed-use developments. Several of these permissions include conditions for a minimum of 10% BNG, aligned with the current statutory requirement. The evidence suggests that achieving a 20% BNG target for major strategic mixed-use sites, which may have additional infrastructure needs, appears unlikely at this time, unless opportunities for the delivery of strategic, landscape-scale mitigation and compensation can be brought forward.

4.35 We would welcome a nuanced site-specific approach.

Policy H/AH: Affordable Housing

4.36 Marshall's Regulation 18 representations highlighted that draft Policy H/AH sets a specific breakdown of tenure types for schemes over 15 dwellings, with no allowance in the policy for a departure from that tenure split where a more appropriate solution can be justified at the time of application based on evidence of need.

4.37 This Policy remains unchanged from the Regulation 18 Plan, requiring major development proposals to provide affordable housing in accordance with Table 6 of the GCLP, which then sets out the mix of tenures within the affordable housing component of scheme. The lack of flexibility is arguably at odds with both 2024 NPPF paragraph 66 and with 2026 NPPF Policy HO8, both of which recognise the role that location plays in determining what the appropriate tenure mix may be.

4.38 Whilst the draft policies reflect GCSP's view of city-wide issues, they are not necessarily right for every site and it is inevitable that the need for different types of affordable housing will vary based on location. The urban nature of Cambridge East, which will provide a significant proportion of employment floorspace and is well-connected to the City Centre and key

employment hubs, is likely to generate a different need and breakdown of affordable housing tenures to new settlements or village locations. Whilst it might be appropriate to indicate an illustrative breakdown of tenure types to guide applications, sufficient flexibility should be baked into the policy to enable sites to accommodate affordable housing that truly reflect the community's needs.

4.39 Amendments to tenure mix are commonplace on strategic sites, with Marleigh and Waterbeach being two examples where this has occurred. Hill 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 affordable housing mix at Cambridge East.

Policy J/AW: Affordable workspace and creative industries

4.40 Hill does not support the introduction of an affordable workspace policy in any form related to the Cambridge East site allocation.

4.41 Affordable workspace policies emerged from a concern in London that specific, niche, clustered businesses that have an economic or cultural benefit outside their immediate sphere (such as the historical, cultural and economic significance of Hatton Garden) could be under pressure from rent rises. In such specific and localised circumstances, it may be justified to implement policies to protect access for those business to workspace in that area.

4.42 There is no evidence to demonstrate that the use of more generalised affordable workspace policies is a good use of economic resources and planning powers for these reasons:

- They represent a diversion of resources that effectively acts as a subsidy to private enterprises. There is no justification for mandating resources to be diverted from other obligations (affordable housing, open space, etc) to subsidise the operation of private business. This is an opportunity cost which, in a challenging market, is very unlikely to result in the best public outcomes;

- It is unlikely to meet an unmet need. Even at very high discount rates, brand new Cat A floorspace is very unlikely to be more affordable than much of the space on the second-hand market. The effect is to subsidise businesses who are already doing relatively well. A blanket affordable workspace requirement also risks delivering space for which there is limited operator or occupier demand, particularly where it is not targeted at specific sectors or identified needs, potentially resulting in underutilised floorspace and reduced market flexibility. In some cases the beneficiaries may be a charity or social enterprise, but if the authority is intending to deliver a 10% of all net additional floorspace in its plan as affordable, that is well in excess of the space needed for such occupiers (90,000 sqm in total across the plan).

- It creates a constraint and risk around delivery of business and employment space which is front and centre of the GCSP and national aspirations for growth. Cambridge is one of the most important growth zones in the UK and any impediment to growth in this area (such as occupation triggers, Grampians, and challenges of finding eligible operators and tenants) would add risk, complexity and investment aversion.

4.43 Many commercial operators chose to offer rent free periods, discounts, amortised fitouts and flexible terms in order to attract a wide range of occupiers and a resilient occupier base. It is very likely that such offers will be available at this site, but they should not be mandated.

Small or flexible sized units are naturally more affordable and would generally be part of any strategic commercial offer. Commercial operators also voluntarily run incubators and SME hubs because it makes good business sense. These approaches do not need to be mandated but are a natural response from developers to placemaking, value creation and tenant offer, achieved without creating risk to investment in Cambridge.

Policy CC/WE: Water efficiency in new developments

4.44 Marshall's Regulation 18 representations in relation to Policy CC/WE remain relevant and should be read alongside these Regulation 19 representations. Whilst a number of amendments have been made to the policy wording, the principal concerns raised at Regulation 18 have not been substantively addressed.

4.45 In particular, the Regulation 19 policy continues to require residential development of 100 or more dwellings to achieve water consumption of no more than 80 litres/person/day, a level which remains significantly beyond current industry practice and whose delivery is dependent upon technological, regulatory and infrastructure changes that are currently outside the control of developers.

4.46 The policy also continues to rely upon water reuse and recycling solutions without addressing the concerns previously raised regarding the ownership, operation, maintenance and long-term viability of such systems, nor the absence of an established regulatory framework to provide consumer protection.

4.47 Similarly, the Regulation 19 draft does not address the concerns raised regarding the treatment of Managed Aquifer Recharge (MAR) within water consumption calculations. As previously noted, current approaches risk discouraging solutions that facilitate groundwater recharge in favour of measures that divert water away from natural recharge processes, potentially undermining the wider objective of protecting local groundwater resources and chalk streams.

4.48 The Regulation 19 policy also continues to provide limited recognition of the important role that strategic water infrastructure projects, district-scale water reuse schemes, future potable water recycling initiatives and the emerging Greater Cambridge Water Credits scheme are expected to play in achieving the Plan's water efficiency objectives. Achieving the requirements of the policy therefore remains substantially dependent on actions by water companies, regulators and public authorities, rather than developers alone.

4.49 For these reasons, Hill stand by the position set out within Marshall's Regulation 18 representations. The key points raised therein remain applicable and should be given full consideration in the examination of the Plan and the further development of Policy CC/WE and its supporting text.

Policy CC/NZ: Net zero carbon new buildings

4.50 Hill support the ambition of reducing carbon emissions and delivering highly sustainable development. However, Cambridge East is at an early stage in the masterplanning process and detailed work is currently underway to establish the most appropriate development framework, mix of uses, density profile, infrastructure strategy, energy strategy and delivery approach for the allocation. The implications of the draft Net zero carbon new buildings policy, including the cumulative impact of the various performance standards and requirements,

cannot therefore be fully assessed at this stage. The ongoing comprehensive masterplanning exercise will provide the evidence necessary to understand how such requirements can be integrated into the development in a manner that is technically feasible, deliverable and consistent with the wider placemaking objectives of the allocation.

4.51 In these circumstances, this representation should be treated as a holding representation. Hill reserve the right to provide further evidence and detailed comments on the policy requirements through the examination process once the masterplanning, technical assessments and supporting evidence base have evolved sufficiently to enable a robust assessment of the policy's implications for the development and delivery of Cambridge East. The absence of detailed comments at this stage should not be interpreted as agreement with the policy requirements or an acceptance that they are justified, effective or consistent with national policy.

Chapter 6 (Wellbeing and Social Inclusion) & Chapter 7 (Great Places)

4.52 The policies in these chapters are well intentioned but there are many areas where the policies are:

- Repetitious – with many repeated references to the same principles. For example transport and accessibility of services and facilities, provision of routes and sustainability of transport are repeated throughout. There are 43 instances of the term “well designed”; 18 instances of “sustainable travel”. There are c.45 policy provisions or supporting statements that make explicit reference to locating development in sustainable locations; walking, cycling or active travel; or public transport and sustainable transport choices. Policy WS/HD acknowledges this cross reference but then continues to provide extensive supporting text that is unnecessary. Health or wellbeing are then mentioned in around 50 other places. We have no doubt these are important points but this can be dealt with through a single well worded policy, not to be repeated under every section.

- Highly subjective and qualitative – making them very challenging to meaningfully measure against or ensure compliance with, i.e. ‘well-designed’. The policies are full of caveats and exclusions, and we encourage the authority to consider whether, when such flexibility or range of variables is clearly needed, it is appropriate to be controlling these factors through the Local Plan process.

4.53 The supporting text has many contextual details that are interesting and could form guidance or ‘best practice notes’. But these sections add large amounts of text to an already very long document without illuminating the policy or aiding interpretation of that policy in any meaningful or specific way. They should be removed to aid overall clarity and brevity.

5 Infrastructure and Viability

Infrastructure and Delivery

5.1 Draft Policy I/ID (Infrastructure and Delivery) confirms that planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of physical and social infrastructure necessary to make the scheme acceptable in planning terms. This requirement is supported by the Infrastructure Delivery Plan (IDP) which identifies a list of infrastructure requirements that GCSP has deemed necessary to support the growth strategy.

5.2 For Cambridge East, a specific itemised list is included at Appendix A of the Infrastructure Delivery Plan and it assumes delivery of 3,950 homes and 21,750sqm of commercial floorspace within the plan period (i.e. 2024-2045). Delivery of development at Cambridge East is scheduled to extend beyond the plan period, and consequently there are details to be established through a planning application in relation to phasing and timing of infrastructure to ensure the development is appropriately serviced and any impacts of the development mitigated.

5.3 Hill reserves the right to demonstrate and evidence the appropriate package of infrastructure requirements for the development, having regard to the requirements of the IDP, once there is greater clarity on the scope of the application.

5.4 In the meantime, Hill have more detailed comments on the specific requirements listed in Appendix A of the Infrastructure Delivery Schedule for Cambridge East. Responses to the transport requirements are outlined in the table below:

Transport Infrastructure Item	Representation	Proposed Amendment
1. Active travel routes to the Chisholm Trail	Support in principle. However, the route would require interventions on Common Land and may be subject to separate statutory processes, including the potential for public inquiry. The IDP should recognise that delivery is dependent upon approvals and land outside the control of the developer.	Amend wording to require financial contributions towards and facilitation of active travel connections to the Chisholm Trail, rather than implying direct delivery by the development. Retain S106 as the delivery mechanism.
2. Improvements to public transport	The current wording conflates two separate requirements: delivery of physical transport infrastructure through the site and subsidy of public transport services. These are distinct interventions with different delivery and funding mechanisms.	Split into two separate infrastructure items: (i) High quality public transport/transit route through Cambridge East (developer funded and delivered infrastructure); and (ii) Contributions towards public transport services and operational support (CPCA or PT operator responsibility with S106

		contributions from the development paid to relevant transport operators).
3. Site-specific active travel improvements	The infrastructure item lacks clarity and appears to overlap with Items 4, 5 and 6. It is unclear what specific infrastructure is being sought and risks double counting obligations.	Delete the item or clearly identify the infrastructure proposed. The schedule should avoid undefined strategic contingencies or cumulative funding pots.
4. Active travel connections to surrounding transport corridors	Supported. These routes form a natural part of the site's movement framework and are likely to be delivered directly through the development.	Retain item but identify it as developer-delivered infrastructure rather than a generic S106 contribution.
5. Strategic active travel connections beyond the site	The routes identified vary significantly in status and deliverability. Some are already promoted through separate programmes whilst others remain undefined. The inclusion of West Cambridge connections is not justified.	Retain connections to South Cambridge and the Biomedical Campus through appropriate contributions. Amend wording relating to Central Cambridge routes to identify these as contributions toward wider authority-led improvements. Remove references to routes towards West Cambridge and Eddington.
6. Cycle network improvements	It is unclear how this differs from Item 3 and there appears to be a significant risk of duplication and double counting.	Either merge with Item 3 or provide a clear schedule identifying which specific cycle interventions are not already captured by other infrastructure requirements.
7. Mobility hubs	Supported in principle. However, the policy should recognise that delivery responsibilities may vary depending on future governance arrangements and operational models.	Amend wording to clarify that mobility hubs may be delivered directly by the development or through contributions towards local authority-led provision if the local authority are in a position in the future to deliver mobility hubs.
8. Delivery and consolidation hubs	The policy is unnecessarily prescriptive in requiring a network of hubs when the optimum solution may comprise a single hub or multiple facilities. The proposed funding mechanism is also unclear.	Amend wording to read: "A delivery and consolidation hub or hubs in conjunction with a last mile delivery system to minimise unnecessary vehicle trips."
9. Parking barns	This is not infrastructure that should be funded via planning obligations. Rather, it forms part of the development's parking strategy and design response.	Rename as "Innovative Parking Solutions" and identify as a developer responsibility rather than a S106 requirement.
10. Sensor and AI technology for	Supported. The item assists in monitoring and managing	No amendment proposed.

trip budget management	compliance with the trip budget and transport strategy.	

5.5 Notwithstanding the above, the IDP fails to identify several key pieces of transport infrastructure that are considered to be relevant to the delivery of Cambridge East:

- **Newmarket Road Travel Hub:** The Greater Cambridge Partnership (GCP) is proposing to relocate the existing Newmarket Road Park & Ride to a new Newmarket Road Travel Hub site near the Newmarket Road and Airport Way junction. The current Park & Ride is on leased land within the Marleigh development and is safeguarded for future development, so GCP is progressing a replacement site off Airport Way. The new travel hub would form part of the movement network serving the development at Cambridge East, materially strengthening the site's wider connectivity. GCP has been preparing an application which it is proposing to submit later in 2026. The Travel Hub has been progressed as part of the Cambridge Eastern Access programme and the GCP budget indicates funding of £58.5m is agreed to deliver this[2].

- **Eastern Access Phase A:** Phase A, proposed by the GCP, is not dependent on the relocation of airport activities but would see Newmarket Road improved for public transport, walking and cycling alongside enhanced landscaping and environmental schemes. Whilst not dependent on the airport being redeveloped, Phase A will have significant benefits for Cambridge East by delivering infrastructure that will enable a positive modal shift for both the existing and any new community. The Phase A Business Case has been approved and detailed scheme designs have been prepared by the GCP. Phase A is funded with the current GCP budgets.

- **Fulbourn Greenway:** This has not yet been delivered, but forms an important component of the wider active travel network within which Cambridge East will sit. The scheme is being promoted and funded separately through the GCP Greenways project and is therefore not an item that Cambridge East is required to deliver directly. However, it remains a strategically important corridor that will provide enhanced walking, wheeling and cycling connections between Cambridge East, Fulbourn and destinations further south and east. Whilst the Greenway has not yet been delivered, it should be identified within the list of related transport schemes to ensure that the masterplanning and delivery of Cambridge East facilitates appropriate connections to it, thereby maximising sustainable travel opportunities and strengthening the site's integration with the wider active travel network.

5.6 Comments on the social infrastructure requirements are as follows:

- **Education:** 3,950 homes in the allocation does not in itself justify the delivery of an 8FE secondary school. The IDP and Local Plan policies must make explicit that education delivery should always be proportionate to need from the development and that, should a school be required in excess of the needs of the Cambridge East site, funding for both

[2]https://cambridgeshire.cmis.uk.com/CCC_live/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=XWH2DgQWABNnmiq9go97tNyDu9bCuNIBs200A0yQAYqE3yriPISMjw%3d%3d&rUzwRPf%2bZ3zd4E7Ikn8Lyw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWCtPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJFf55vVA%3d&FgPlIEJYlotS%2bYGoBi5olA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3d&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJFf55vVA%3d

land and capital cost will be pooled from other developments and/or Basic Needs funding. The IDP Appendix A for Cambridge East should make it explicit whether sixth form is intended to be included or excluded from both the land-take and capital contribution.

- **New healthcare facility:** £15m is a very high cost for a health centre of the likely scale required here – all contributions will be based on a realistic and proportionate cost planning exercise at the time of agreeing the S106.
- **Community Centres and Libraries:** Budgets for library and community floorspace should be seen as indicative until an appropriate site-specific strategy is agreed, relevant to the needs of the community at the time.
- **Sports Hall:** The option should be retained for the sports hall provision to be met by an appropriately designed collocated facility at the secondary school and therefore have negligible net additional cost.
- **Swimming Pool:** The swimming pool requirement in the IDP should take account of the representations made for Policy S/CE regarding the specific size dimensions of the pool which should be determined based on up-to-date evidence at the time the application is submitted. Any swimming pool meeting wider regional needs will require contributions from other developments where this facility is addressing those needs.
- **Outdoor Sports:** The sports provision should be made flexible to respond to more diverse outdoor sport, recreation and activity needs at the time of delivery, including sport for women and girls.

5.7 Hill request that the IDP Appendix A Infrastructure Delivery Schedule for Cambridge East is reconsidered on the basis of the comments identified above.

Viability

5.8 Hill have reviewed the Council's viability evidence and consider that a number of the assumptions underpinning the assessment require further scrutiny before the conclusions can be relied upon.

5.9 While the viability appraisal provides a high-level assessment of plan-wide viability, it does not fully reflect the specific circumstances, costs and infrastructure requirements associated with the delivery of Cambridge East. The evidence should therefore not be treated as a definitive assessment of the viability implications of the allocation or the policy requirements proposed within the Plan.

5.10 In particular, there is insufficient evidence that the full cost of strategic transport infrastructure required to support Cambridge East has been tested through the viability appraisal.

5.11 The assessment states that *"the cost of mitigation measures (e.g. highways improvements, travel plans, bus contributions) is assumed to be included in the CIL rate and the site-specific s106 contributions."* (page 23). However, the current CIL charging schedule was established to address infrastructure requirements associated with the adopted Local Plans (which doesnt not include an allocation for Cambridge East) and the assessment does not reflect the transport interventions necessary to support the scale of growth proposed through the emerging Greater Cambridge Local Plan. Equally, the extent of site-specific transport

mitigation required to support Cambridge East has not yet been fully determined, which will be established through ongoing masterplanning, transport modelling and infrastructure planning work. The full cost implications of these requirements are not yet known and hence have not been reflected in the viability assessment.

5.12 This is acknowledged in the Council's appraisal which states *"at this point our appraisals do not incorporate any infrastructure costs over and above standard development costs"* and that *"site specific constraints may affect costs on a case-by-case basis"* (page 24). Cambridge East is a complex strategic allocation with a range of site-specific costs, including relocation and vacant possession costs associated with existing airport operations, together with transport infrastructure requirements that remain subject to further assessment. By its own admission, the viability appraisal has not incorporated these costs. As a result, the assessment does not provide a complete picture of the cost assumptions associated with the delivery of Cambridge East.

5.13 There is also a risk that the infrastructure assumptions underpinning the viability evidence do not fully reflect the long-term delivery trajectory of Cambridge East. The Infrastructure Delivery Plan principally considers infrastructure required to support development within the plan period, whereas Cambridge East will continue to be delivered significantly beyond that timeframe. Consequently, the appraisal has not assessed the full extent of infrastructure requirements that may arise over the lifetime of the development, particularly where strategic transport interventions are linked to later phases of growth.

5.14 Hill will continue to undertake detailed masterplanning and technical work to better understand the precise costs associated with the development, which will provide a more detailed picture than presented in the evidence that supports the Local Plan. If necessary, in accordance with the requirements of Policy DM5 of the NPPF (2026), this will support a financial viability assessment that may be submitted along the future planning application for the site.

Community Infrastructure Levy

5.15 The draft policy states that financial contributions via the Community Infrastructure Levy will be required where this is operable at the point of the application. In relation to Cambridge East, Quod submitted representations on behalf of Marshalls to the Draft Charging Schedule consultation which took place in February and March 2026 (Appendix 5). These representations highlight that the proposed CIL appears to have been calculated to help meet a gap in infrastructure funding relevant to the 2018 local plans. Those local plans do not assume or plan for the development of the Cambridge East site – they in fact prevent its development until after those local plans have been reviewed. Hill intends to submit a Hearing Statement ahead of the CIL examination which builds upon Marshall's earlier representations.

5.16 Through those representations, it is therefore proposed that the Charging Schedule should not apply to the development of the land and amendments have been sought to ensure the status of the Charging Schedule and its relationship to future growth is clarified.

5.17 Hill have commenced a masterplanning exercise to determine the type and scale of development that planning permission will be sought for, but this is currently at an early stage. In the meantime, the draft site allocation in the emerging GCLP (Policy S/CE) indicates that the site's development will need to be supported by a range of infrastructure albeit the scale of development and the range of infrastructure has not yet been masterplanned or assessed.

5.18 For example, the Regulation 19 draft GCLP sets high expectations for the site's sustainable development, including in relation to transport. In particular, draft Policy S/CE provides that the site's development must:

"Ensure an exemplar approach to movement and transport within and through the site, transforming the wider connectivity of the eastern edge of Cambridge and promoting a low car living approach where 'walking and wheeling' are the first choice for most residents, workers and visitors from the outset."

5.19 It is apparent from the draft Policy that a deliberate site-specific solution is required in order to ensure that this and other critical objectives for the site are achieved. The draft site allocation provides:

"To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer for agreement with the Local Highways Authority and Local Planning Authority. This must include:

a. Active and public transport measures;

b. Vehicular transport measures, including site access arrangements;

c. A comprehensive parking strategy aligned with low-car living objectives;

d. Infrastructure costing and delivery phasing, demonstrating how the necessary transport measures identified above will be delivered at a time that enables optimal transport outcomes and remains within the agreed trip budget; and

e. Mechanisms for delivery, monitoring and review including potential delivery through Section 106 obligations, or CIL or other appropriate funding mechanisms."

5.20 No discussions have yet taken place about how any site-specific funding and delivery mechanism will work but it is clear that it must be tailored to the requirements of the site, rather than a generalised city-wide CIL.

5.21 Similarly, draft Policy S/CE requires the site's development to contain internal travel networks which connect Cambridge East to other key destinations through:

"iii. A package of bus service enhancements, or other public transport modes where appropriate, connecting the site with North East Cambridge, West Cambridge, Cambridge City Centre, Cambridge railway station and the Cambridge Biomedical Campus;

iv. A high-quality public transport scheme, linking the high-quality public transport route within the site to the city centre; and

v. Active travel enhancements to wider connections linking with key destinations including Cambridge railway station, City Centre and onwards to West Cambridge and wider destinations on radial high quality public transport corridors (HQPT); Cambridge Regional College, North East Cambridge and Cambridge North Station; Cambridge Biomedical Campus, Cambridge South Station and Cambridge Leisure site."

5.22 To help achieve this, a wider Greater Cambridge Transport Study ("GCTS") is being prepared to underpin the GCLP. However, that GCTS is not yet developed, tested or costed by the authorities and no funding mechanism has been drafted to enable its delivery.

5.23 These issues will be worked up through the finalisation of the GCLP and the submission of a planning application. There is no reference to them in the documents supporting or justifying the current draft CIL. It would be inappropriate to apply a CIL which is based on delivering the 2018 Local Plans to development and infrastructure which is being planned and costed in the emerging GCLP, which will need to devise its own delivery and funding mechanism if it is to be found sound. Any CIL or other funding mechanism relevant to Cambridge East, therefore, needs to be planned and tested alongside the policies of the GCLP, not the 2018 plans.

5.24 As a strategic site and a cornerstone of the emerging GCLP, the Cambridge East site is very different from other sites that may be allocated in the plan. In particular, the emerging draft allocation Policy S/CE identifies that Cambridge East will have its own unique infrastructure requirements – and that sufficient confidence in the provision of that infrastructure side by side with the development of the site will be necessary.

5.25 The timely provision of bespoke infrastructure would be jeopardised if Cambridge East is simply another site contributing to pooled infrastructure funding. In order to demonstrate and achieve its deliverability, a bespoke outcome will be necessary.

5.26 Exclusion from general CIL would not be unusual for strategic sites of the scale of Cambridge East (or often smaller). For strategic sites and infrastructure, the PPG references the need for a charging authority to "*take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land. A realistic understanding of costs is essential to the proper assessment of viability in an area*." (paragraph 021).

5.27 In relation to strategic sites, it further provides:

> ***"Can authorities set different rates for strategic sites?***
> *"Charging authorities may want to consider how zonal rates can ensure that the levy compliments plan policies for strategic sites. This may include setting specific rates for strategic sites that reflect the land value uplift their development creates.* ***Low or zero rates may be appropriate where plan policies require significant contributions towards housing or infrastructure through planning obligations*** *and this is evidenced by an assessment of viability*". Paragraph: 026 Reference ID: 25-026-20190901

5.28 The Guidance reflects the fact that the application of a generalised CIL becomes an added complication for a strategic site. The Council will seek to secure the delivery of site-specific infrastructure through planning conditions and obligations. A generalised CIL adds cost without ensuring delivery, compared with the direct link that would be achieved between securing the requirement through planning obligations.

5.29 The addition of a generalised CIL also risks undermining delivery by double taxing strategic sites (with CIL and a full s.106 package). The recently published Planning Obligations SPD (adopted by the Councils in 2026) makes little reference to CIL and gives no comfort in this regard. Planning obligations are the most effective route to securing infrastructure when it is required alongside the delivery of new homes.

5.30 Therefore, Hill seek, either through amendments to this policy, the Cambridge East policy, through amendments to the draft CIL Charging Schedule or a statement of common ground, that the Cambridge East is nil rated for CIL and the bespoke package of infrastructure required to support the development is determined through up to date evidence submitted with the planning application. If at the time an application is advanced the current draft CIL Charging Schedule linked to the 2018 Local Plan is adopted and an update to the Charging Schedule based on the GCLP is not in place, as per Policy H013 of the NPPF, Hill will wish to work with the local planning authority to develop a 'consenting framework' to reflect the strategic nature of the site and potential change in circumstances for infrastructure delivery.

Appendix 1 – Regulation 18 Representations to the Greater Cambridge Local Plan (submitted on behalf of Marshall)

Quod

Representations to Reg 18 Greater Cambridge Local Plan Consultation

Cambridge East

30 JANUARY 2026

Q100433

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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".*[1] 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

[1] 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 or 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[2].

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

[2] '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 145,000m² 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 m² 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 3rd 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 polices 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.

Appendix 2 – Cambridge East Expansion Land – Information Pack

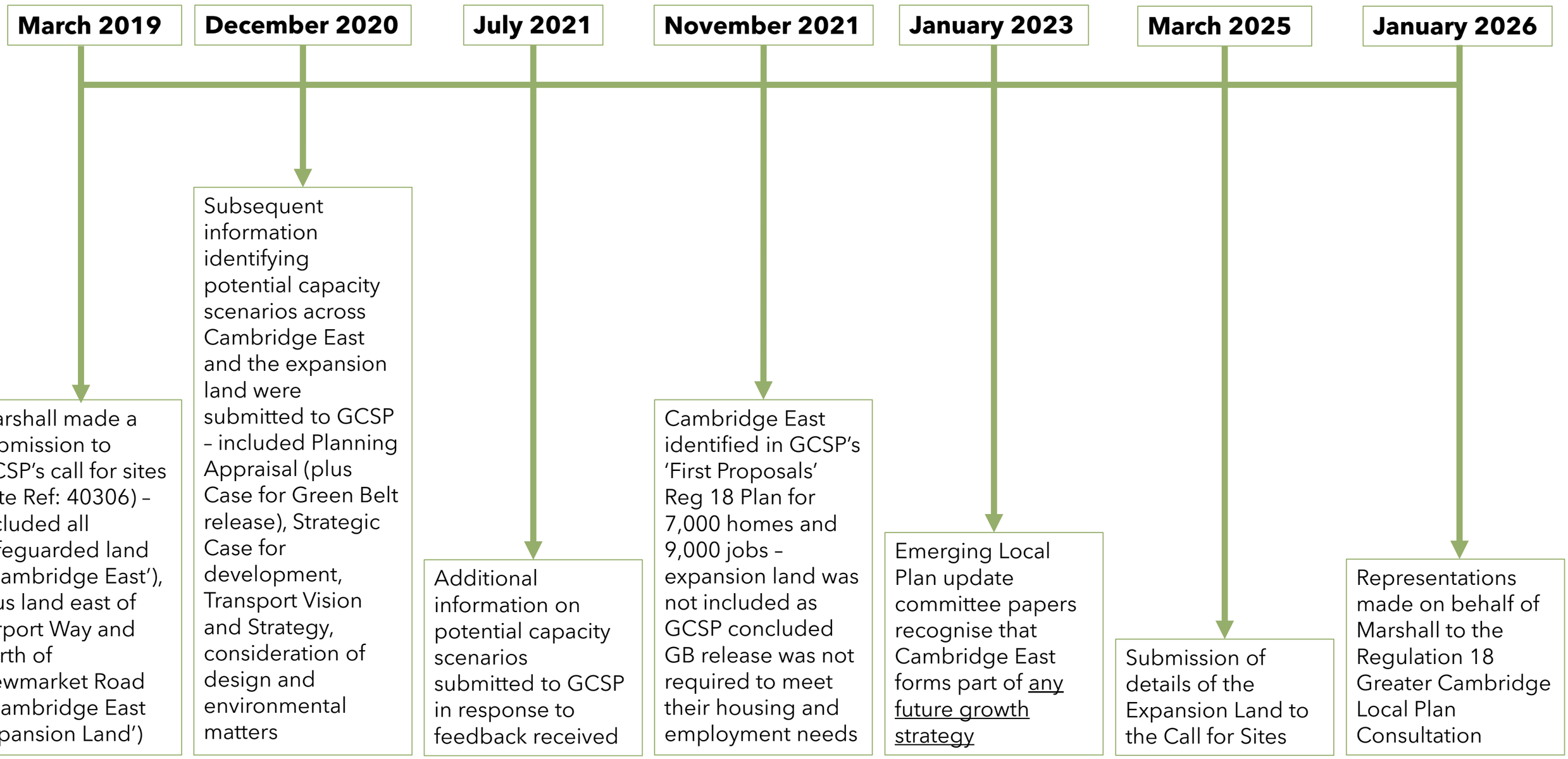
CAMBRIDGE EAST EXPANSION LAND

INFORMATION PACK
REGULATION 19
GREATER CAMBRIDGE LOCAL PLAN
CONSULATION

SEPTEMBER 2026

CONTEXT & BACKGROUND

PREVIOUS SUBMISSIONS AND EMERGING LOCAL PLAN



CONTEXT & BACKGROUND

WHAT HAS CHANGED?

- Since submission of information on the Cambridge East site between 2019 and 2021 and the publication of GCSP's Regulation 19 Local Plan, there has been a change of Government and **consequential changes to guidance / policy** at the national level which have implications for growth at Cambridge

- Cambridge Growth Company (CGC) was established in July 2023 to drive forward growth in Cambridge – **Government ambition to maximise the economic potential of Cambridge**

- 'A Case for Cambridge' was published with the Spring Budget (March 2024) – recognised the importance of Cambridge as a world-renowned centre of science and innovation and **central component to the success of the UK economy**

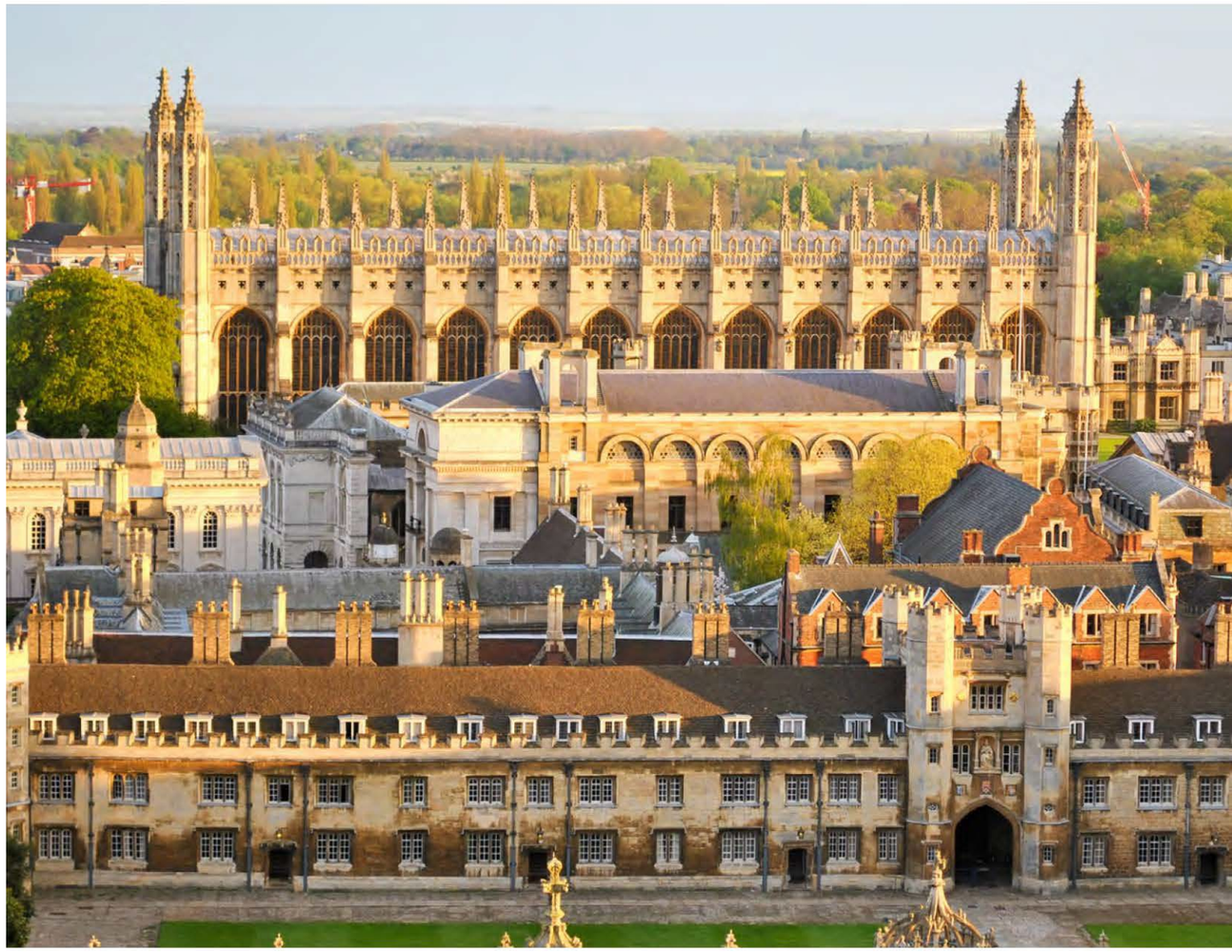
- Indicative scales of growth identified for Cambridge – **100,000 – 150,000 new homes** by 2050

- Labour has revised the NPPF and PPG to enable a more **pro-growth approach** to development, including the explicit requirement that **Green Belt options should be examined**

HM Government

The Case for Cambridge

March 2024



CAMBRIDGE EAST EXPANSION LAND

- This document relates to the Cambridge East Expansion Land – site area extends to **131 hectares** (as indicated in red)

- This land should be **considered within the context of the Cambridge East development**, which has been identified as suitable for delivering a new urban quarter for Cambridge

- Hill / Homes England are the **majority landowner** – however there are some parcels of third party land included within the red line, including land owned by the County Council

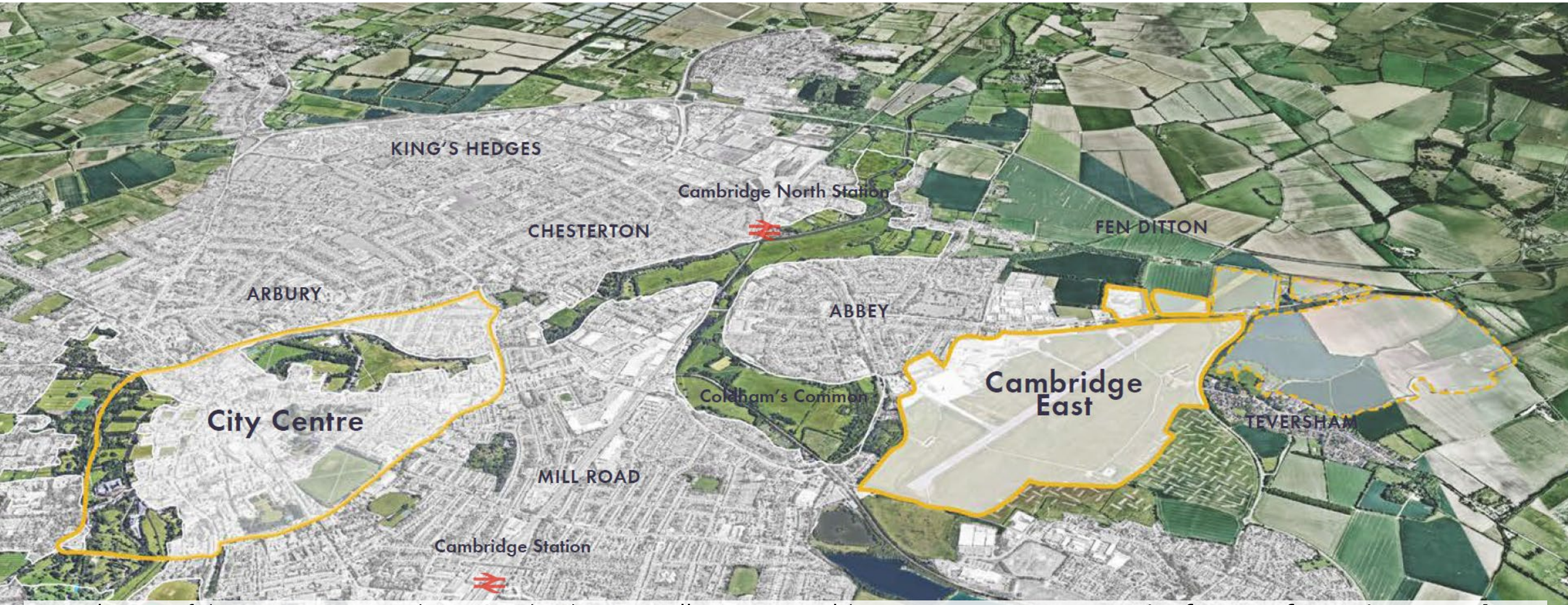
- A letter confirming that the County wishes to **explore the potential for complementary development** on their land was provided with the March 2019 Call for Sites submission

- The red line includes the land proposed for the **Travel Hub (promoted by the GCP)** – this is now in Hill / Homes England ownership

- There are other lease and ownership considerations, but **nothing known to Hill that would impinge on or delay the delivery of development**



SCALE OF THE OPPORTUNITY



- Inclusion of the Expansion Land in a Cambridge East allocation would create **greater opportunity for transformative growth**, connected green infrastructure and sustainable transport connections
- GCSP's evidence base concludes that development on the edge of Cambridge **ranks 2nd** (behind Cambridge Urban Area) **in terms of sustainability credentials** when considering the appropriate approach to growth in Greater Cambridge
- The Local Plan Sustainability Appraisal confirms that the Cambridge Urban Area (i.e. land outside the Green Belt) is *"unlikely to be able to deliver significant volumes of new homes"* – meaning **edge of Cambridge sites represent the most sustainable opportunities for large scale growth**
- The NPPF (2026) gives **'in principle' support** for suitable proposals that develop land **around well-connected stations, even where these sites are outside the settlement and in the Green Belt. The new station confirms the suitability of the Expansion Land for growth.**

SITE CONSTRAINTS

EXISTING SITE

Heritage:

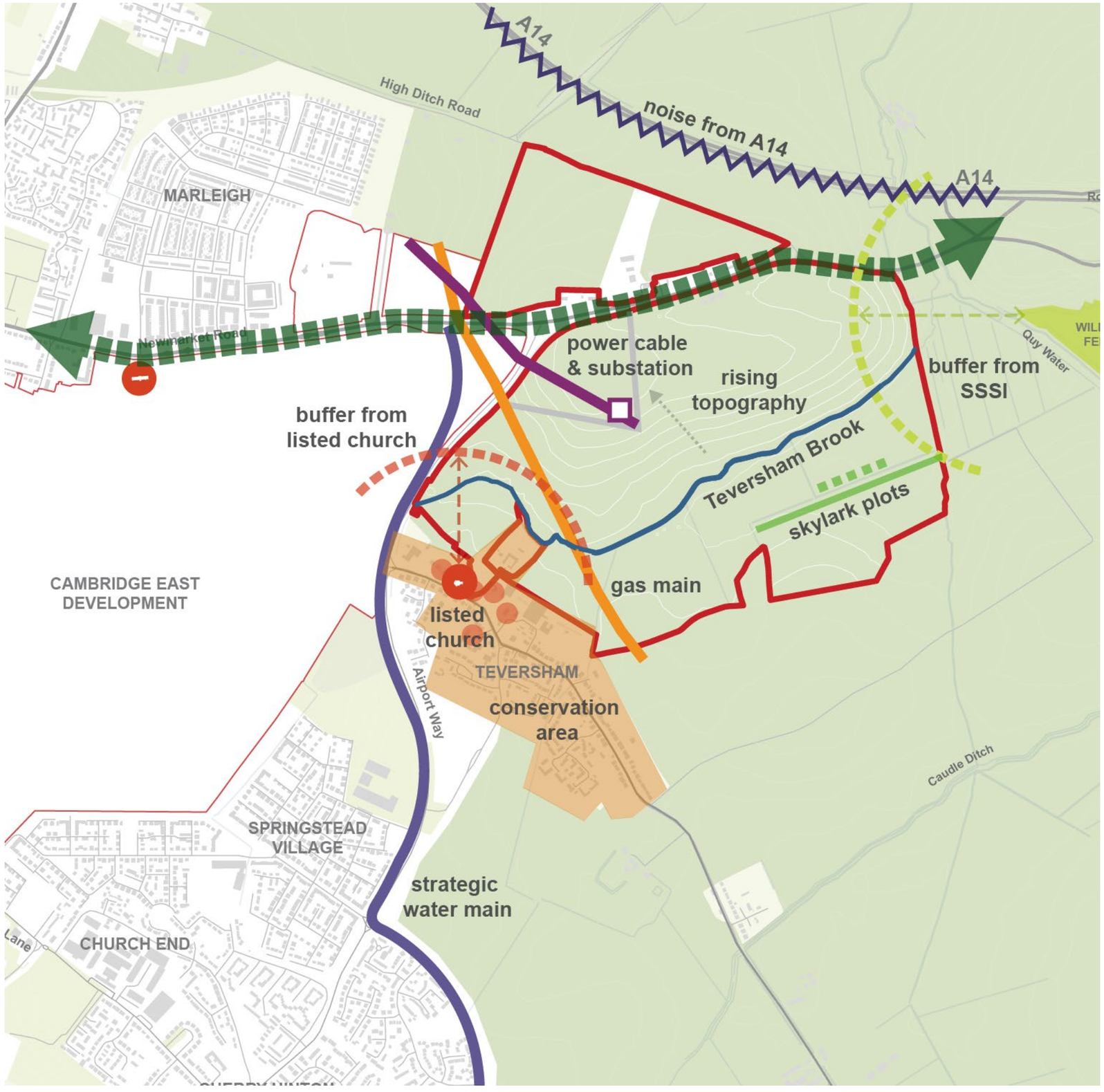
- Consideration must be given to the adjacent Teversham Conservation Area and Listed Buildings, particularly the Grade 2 Listed Church of All Saints.

Landscape & Ecology:

- The site has a gentle rise north of Teversham Brook with AODs ranging from 8 to 15 metres.
- The highest ground to the northeast of the site adjacent to Newmarket Road.
- Consideration must also be given to Little Wilbraham Fen SSSI that lies east of the site through a suitable landscape buffer.

Utilities:

- Underground electrical cables and gas mains run along the east side of the site and would need to be considered.
- A new sub-station is to be delivered within the park and ride site.



CONCEPT PLAN

The Hill Group

TO CAMBRIDGE NORTH

RIVER CAM

Railway

TO CAMBRIDGE NORTH

A14

ORBITAL

High Ditch Road

A14

Quy Roundabout

MARLEIGH
(under construction on former Marshall land)

BARNWELL

EXPANSION LAND DEVELOPMENT AREA

Newmarket Road

TRAVEL HUB

EXPANSION LAND DEVELOPMENT AREA

Landscape buffer to SSSI

Quy Water

WILBRAHAM FENS SSSI

CAMBRIDGE EAST DEVELOPMENT AREA

Teversham Brook

FEN LANDSCAPE

Teversham Brook

GREEN CORRIDOR

TO CAMBRIDGE CENTRAL

COLDHAMS COMMON

Coldham's Brook

TEVERSHAM

Airport Way

Caudle Ditch

SPRINGSTEAD VILLAGE
(under construction on former Marshall land)

NEW STATION

Coldham's Lane

CHURCH END

Cherry Hinton Brook

PROJECT NEWTON INNOVATION DISTRICT
(planning stage)

CHERRY HINTON

TO BURY ST EDMUNDS

KEY

- Development area
- Landscape area
- Orbital route
- Railway
- Expansion Land site boundary
- Cambridge East site boundary

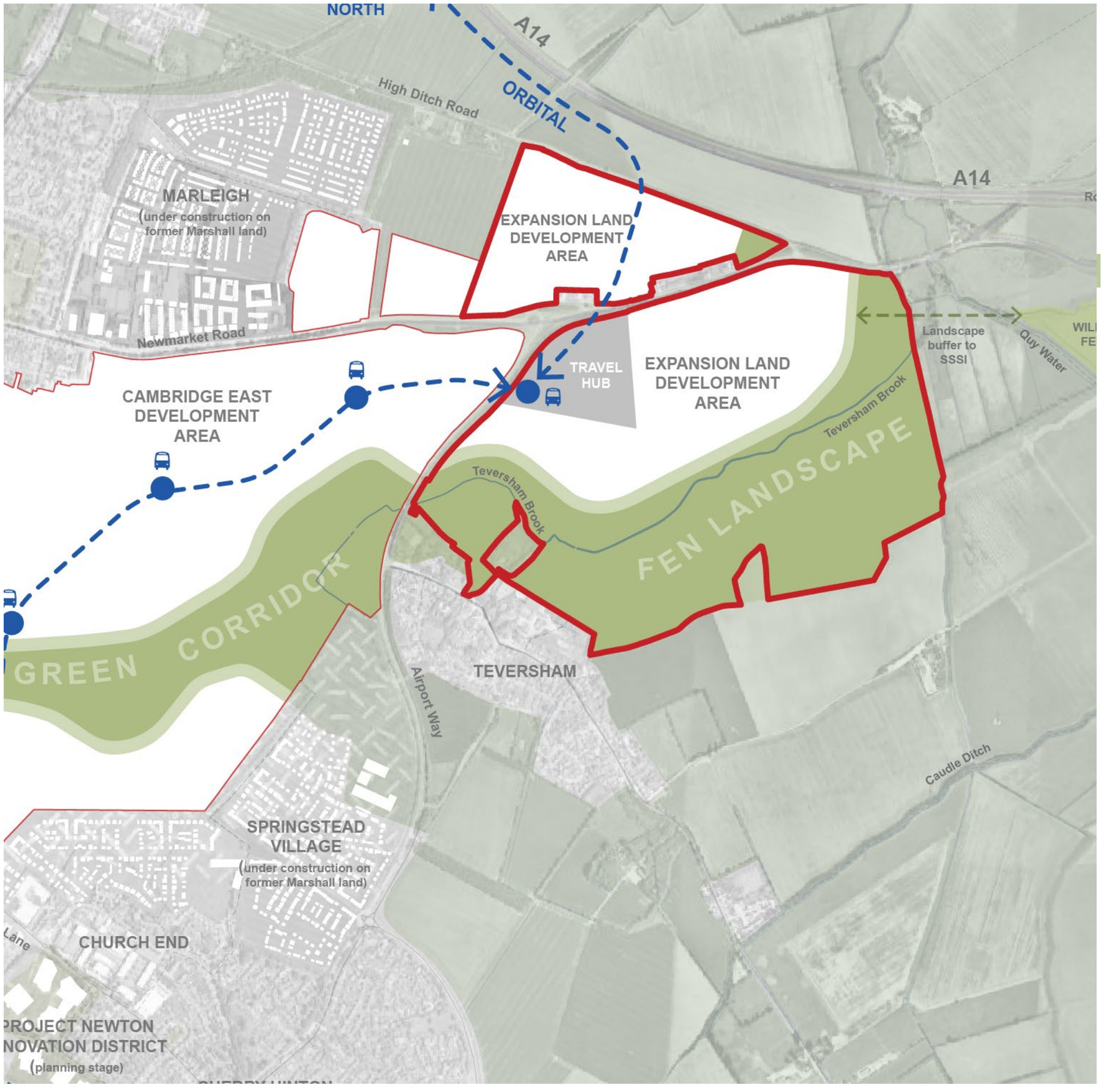
INDICATIVE SITE CAPACITY ESTIMATE

SUMMARY

Preliminary work on the development potential of the Expansion Land site was undertaken to support the Call for Sites submission in March 2025. This took account of all known technical and environmental constraints at that time and indicated a site capacity as illustrated below.

Residential Units	**2750-3250**
Offices / Labs	**up to 0.4m sqft**
Other Commercial	**up to 0.2m sqft**
Jobs	**c. 2000**

Hill are in the process of undertaking a masterplanning exercise which will establish a more detailed understanding of layout, quantum and mix of development to complement the main Airport site and adjoining safeguarded land.



INDICATIVE SITE CAPACITY ESTIMATE

SUMMARY

Residential Units	**2750-3250**
Offices / Labs	**up to 0.4m sqft**
Other Commercial	**up to 0.2m sqft**
Jobs	**c. 2000**

These assumptions were used to determine the above capacity figures, and Hill are currently testing these assumptions as part of their masterplanning exercise.

KEY ASSUMPTIONS

Housing Mix & Typologies

- 30-40% houses
- Houses make up 35-45% developable land area
- 2-4 storeys
- 30-50 dph (gross density)

- 60-70% flats
- Flats make up 15-20% developable land area
- 3-6 storeys
- 150-225 dph (gross density)

Offices & Labs

- 3-5 storeys
- 40% offices
- 60% labs

Other Commercial

- Nominal allowance for light commercial, retail, entertainment, culture, sports and leisure uses

Open Space Provision

- Significant area of open space retained as buffer to Teversham and Teversham Brook which will contribute to Biodiversity Net Gain requirements.
- Allowance for open space provision within development area in accordance with Local Plan.

School Provision

- Provision of 1 x 4FE or 2 x 2FE primary schools based on estimate of school places required.
- No provision of secondary school on site.

KEY LANDSCAPE & VISUAL CONSIDERATIONS

Site Features:

- Mature vegetation, particularly along Newmarket Road, provides local sense of enclosure and contributes to wooded skyline in long views
- Public footpath runs through Site, adjacent to local water course (Teversham Brook)

Teversham Village:

- Physical separation of development from Teversham will ensure Teversham retains its identity and avoids coalescence with the development (northern part also Conservation Area with listed buildings) – buffer required, containing structural landscape features
- Policy CE/4 for Cambridge East AAP requires Green Corridor (Airport Land) to open up at the Teversham end, with an informal countryside character provided to help maintain individual identity of the village

Views from South & East:

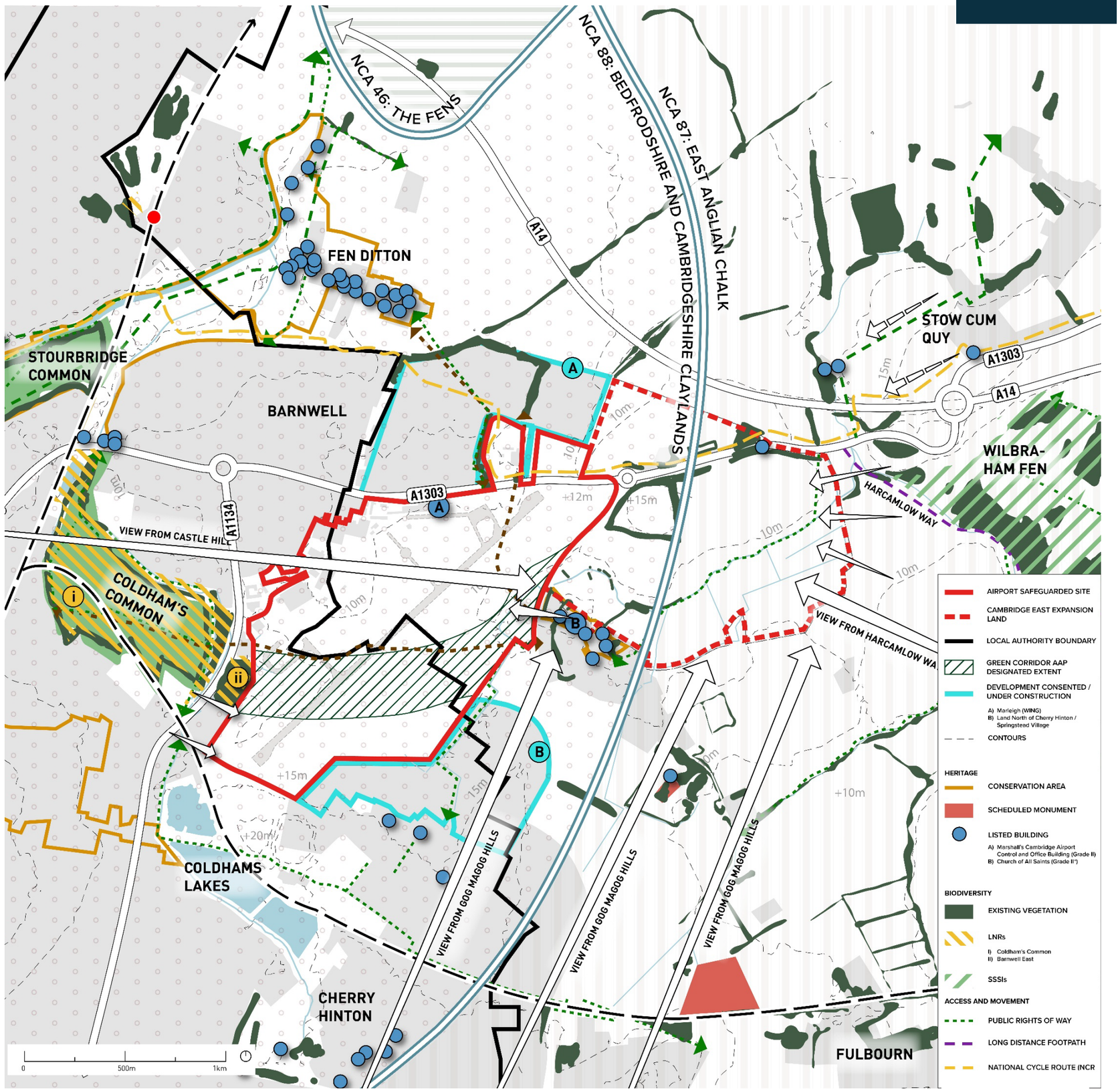
- Long views across open landscape to east and elevated views from Gog Magog Hills to south, susceptible to change
- Retention of existing woodland and structural vegetation (especially to higher lying areas of Site, including along Newmarket Road) will help maintain wooded skyline

Views from North:

- A14 provides separation from landscape to north / northeast, combining with other landscape features to north, limiting influence on character and views
- Stow cum Quy c. 850m to northeast, beyond intervening A14 J35, with filtered middle-distance views of Site

Views from West:

- Long elevated view from Castle Hill Mound, requires consideration of potential impact on skyline
- Otherwise, Site largely disconnected from Cambridge sensitivities by Airport and Marleigh sites



INITIAL HEIGHT CONSIDERATIONS

- The height assumptions below were included in the Call for Sites submission and are being tested as part of Hill's masterplanning exercise.

- Development on **edges facing Teversham Village should be of low height** (2 to 2.5 storey) to minimise influence on village and Conservation Area

- **Structural landscape features required along south and eastern edges**, to soften views of built form – with development of low height (2 to 2.5 storeys) on these edges, grading up to max 6 storeys toward centre of Site and Newmarket Road

- **Low sensitivity of northern edge** provides potential for 3 storey, grading up to max 6 storeys along Newmarket Road

- Potential for **range of heights along Newmarket Road** (set behind retained woodland), ranging from 3 to 6 storeys in height



GREEN INFRASTRUCTURE CONSIDERATIONS

POTENTIAL EASTERN CONNECTION

As an expansion beyond Cambridge East, this Green link heads east through land north of Teversham, connecting onto Newmarket Road and National Cycle Route (NCR) 51.

- SAFEGUARDED SITE
- OTHER MARSHALLS LAND
- NECKLACE VILLAGE BOUNDARY
- WICKEN FEN VISION SOUTH
- GREEN BELT
- PUBLIC RIGHT OF WAY - FOOTPATH
- NATIONAL CYCLE ROUTE 51
- IMPROVED CONNECTION / CROSSING REQUIRED
- NEW PUBLIC FOOTPATH CONNECTION
- (A) BETWEEN AIRPORT WAY AND CONNECTING TO PROW 229/3 ON MARSHALLS LAND
- (B) FIELD NORTH OF THE A1303 - PRIVATE LAND
- PROPOSED 30M WIDE ECOLOGICAL ENHANCEMENT / CONNECTION CORRIDOR
- PROPOSED BUFFER PLANTING

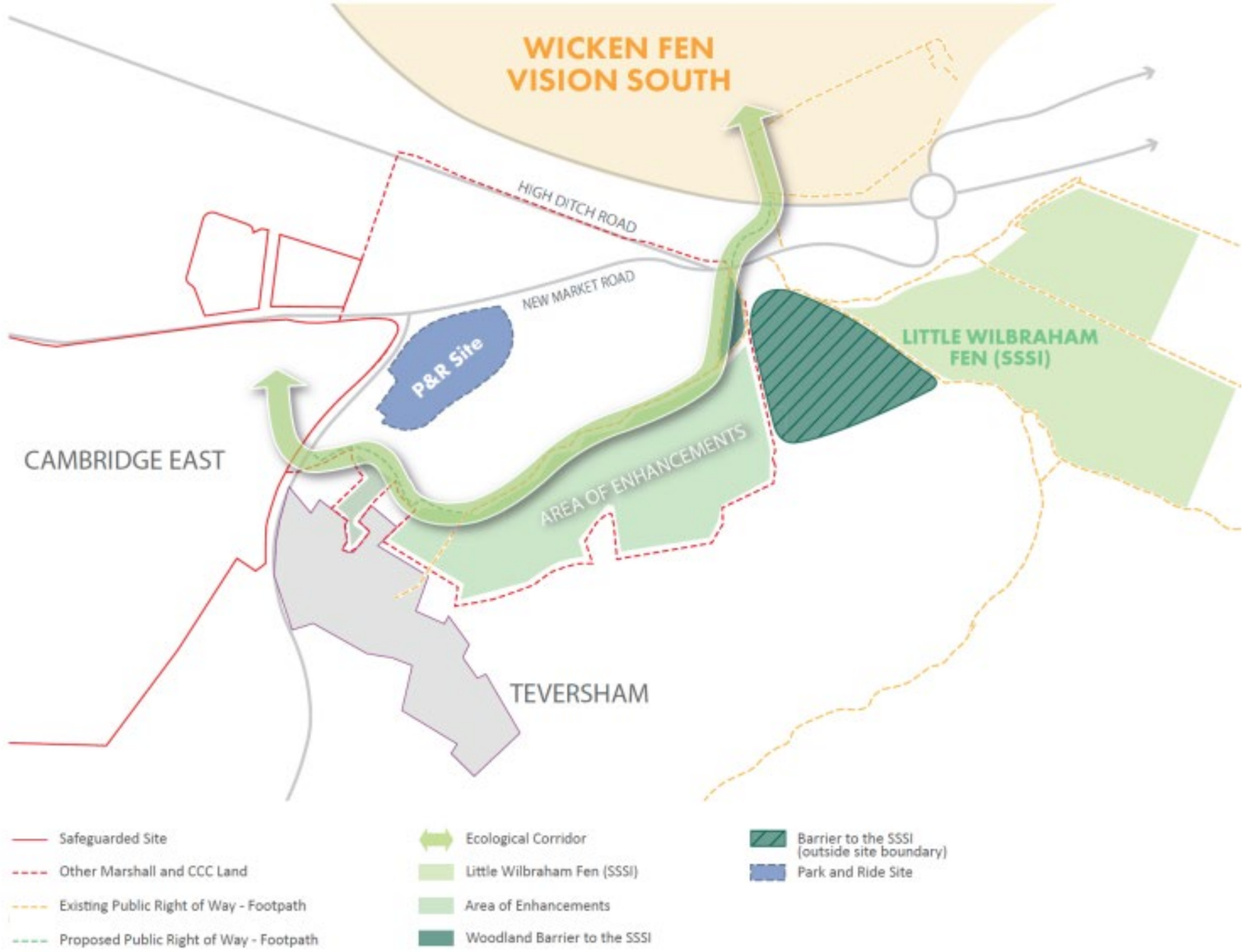


GREEN INFRASTRUCTURE CONSIDERATIONS

EASTERN ENHANCEMENT

Key Principles of the greenspace:

- High value Biodiversity Net Gain (BNG) so that **all BNG is achieved on or adjacent to Cambridge East**;
- Provision of a high-quality footpath within a **corridor that connects Wicken Fen Vision Area with the green corridor** of Cambridge East;
- Open access to most areas thereby providing an **accessible greenspace resource** that can help alleviate recreational pressure for more important ecological greenspaces that occur locally;
- However, with no visitor facilities such as car parks etc. provided thereby it becoming accessible new countryside rather than a country park / green destination – the latter two options would be inappropriate given proximity to the Sites of Special Scientific Interest (SSSIs).
- **Recreational pressure will be directed away from the SSSI** via well-marked and maintained routes ensuring Little Wilbraham Fen does not become an attractive route option with increased footfall. The **SSSI will be screened from development** using appropriate tree species of local provenance to create a physical barrier.



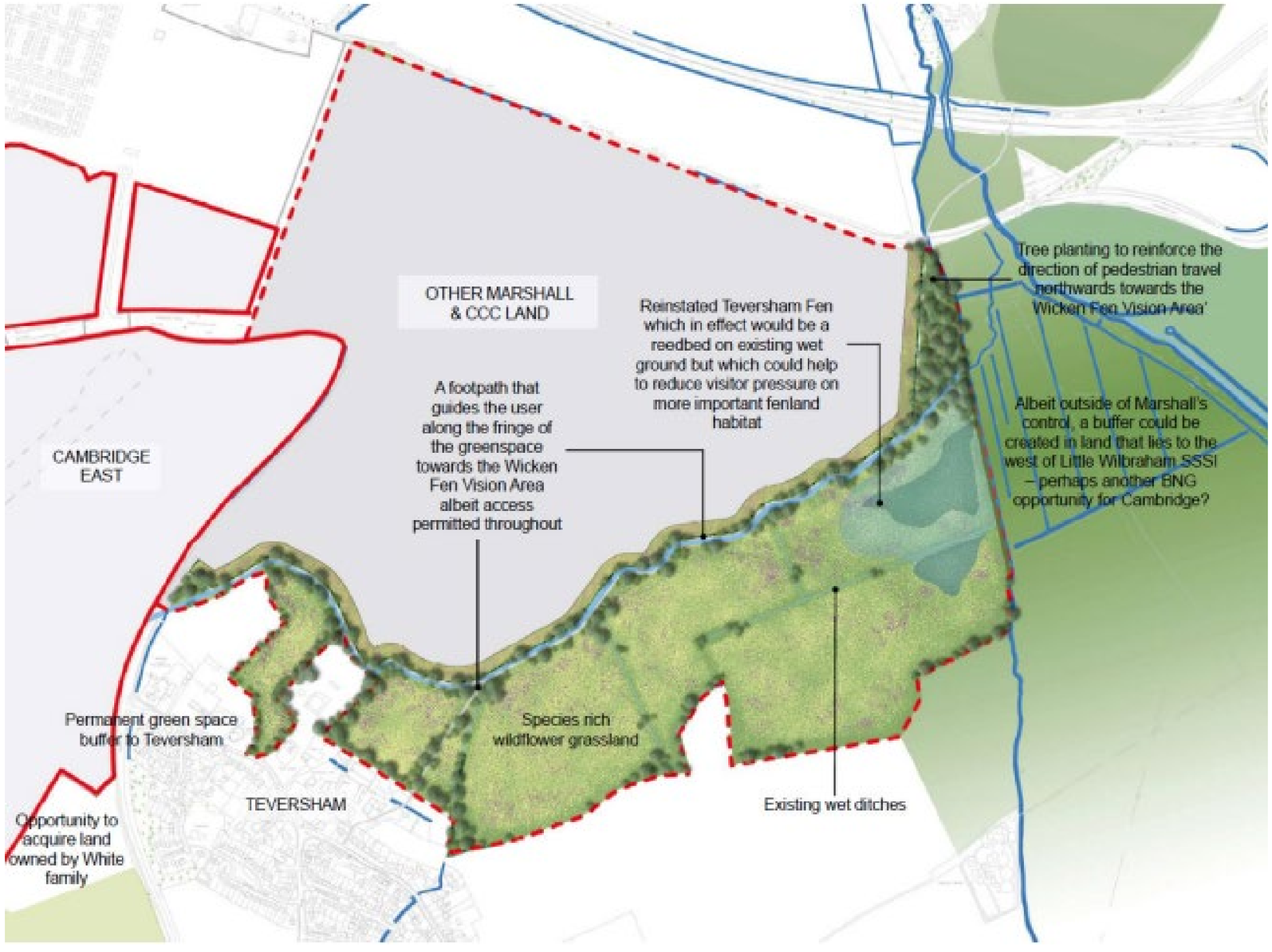
GREEN INFRASTRUCTURE CONSIDERATIONS

EASTERN ENHANCEMENT

- A significant opportunity exists to **provide biodiversity enhancements** within the Cambridge East Expansion Land including the provision of species rich grasslands and the reinstatement of Teversham Fen from its current degraded state.

- This would **provide a major biodiversity benefit and is a key strand of the draft Cambridge Fens Nature Network Strategy** providing both new additional fenland habitat and a buffer to the highly sensitive Little Wilbraham Fen.

- Development within the north of this plot can be **offset within the southern portion of the land**, providing high value BNG.



TRANSPORT

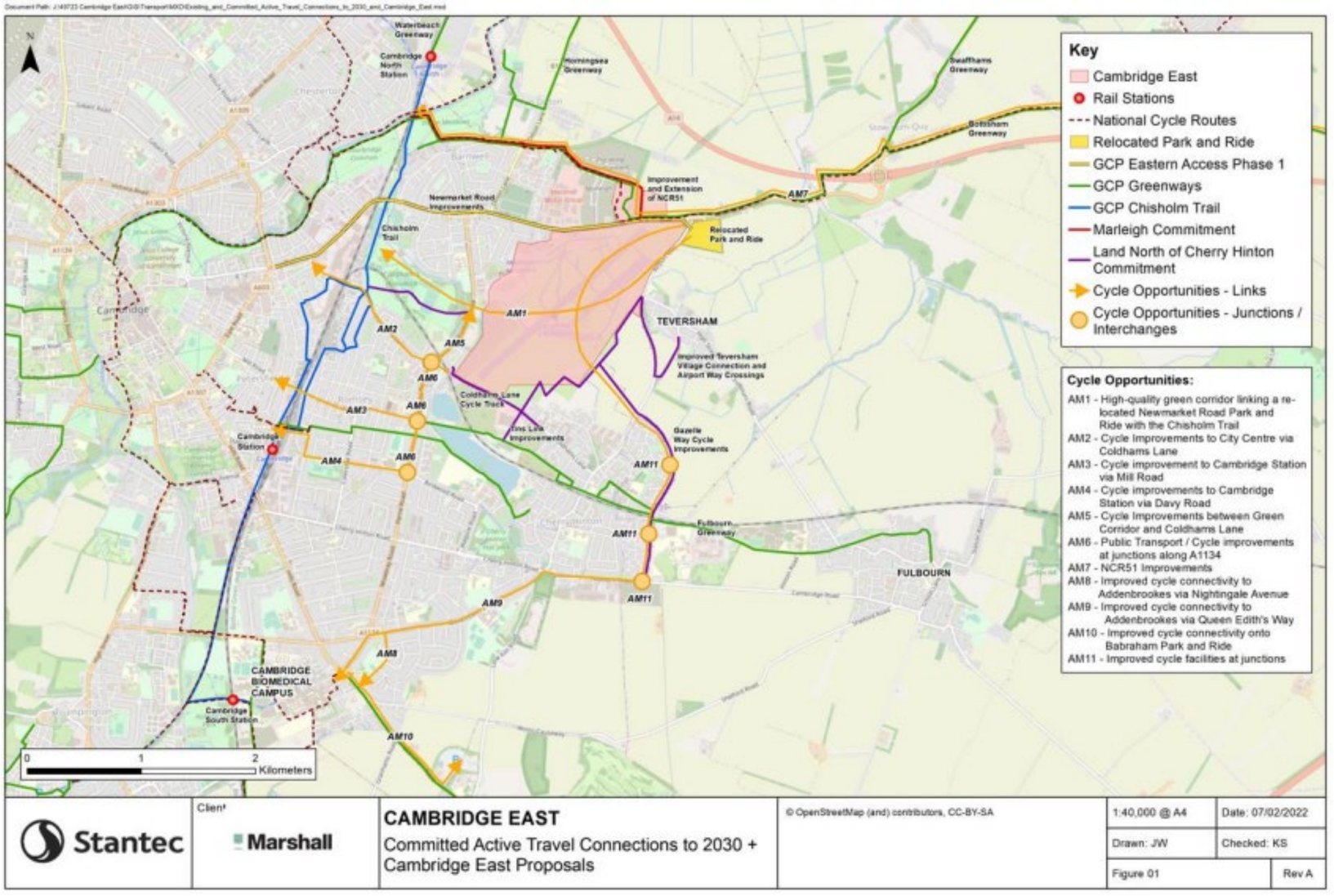
FURTHER GROWTH LEVERAGING INVESTMENT

- Cambridge East is a once in a generation opportunity to **leverage transport investment from the growth of a new contiguous urban extension** of Cambridge. This is recognised by Government.

- The main site has been promoted by Marshall for ~9000 homes and ~9000 jobs and have determined that this could be supported by a transport strategy which was broadly consistent with the transport strategy proposed as part of the Preferred Option version of the Local Plan.

- The strategy, shown alongside, includes numerous walking, cycling and public transport investments delivered directly by the development and also schemes associated with the Greater Cambridge Partnerships (GCP's) transport programme.

- The transport evidence and modelling at the time stated *'there is nothing in the modelling results to suggest that the development locations and quantum included in the Preferred Option cannot be accommodated on the transport network and achieve high levels of travel by sustainable modes'*.



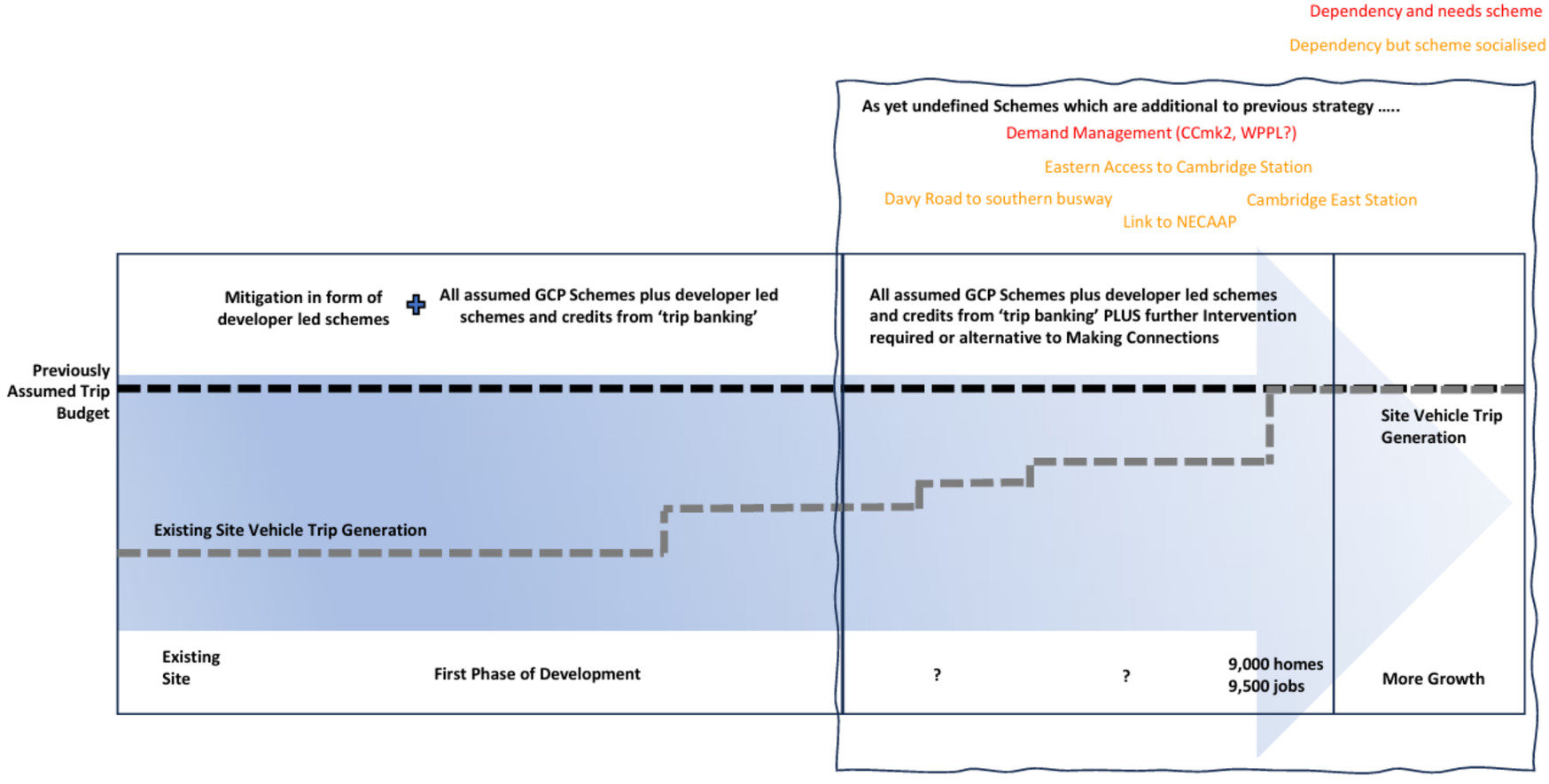
TRANSPORT

FURTHER GROWTH LEVERAGING INVESTMENT

- This positive position for the entire Local Plan has subsequently required review given the technical evidence included a proxy for city access and associated demand management which, with the abandonment of Making Connections, cannot now be relied upon in the shorter term.

- Despite this uncertainty**, Cambridge East remains well placed to form a foundation of the next Local Plan.** This confidence relates to the certainty that **a substantial first phase of development can be delivered without any dependency on investments outside the control of development** and that several alternative strategic transport opportunities are being developed, including a likely new station to the south of the site, which will support the realisation of the full allocation.

- Vision led transport planning that works with uncertainty is now national policy.



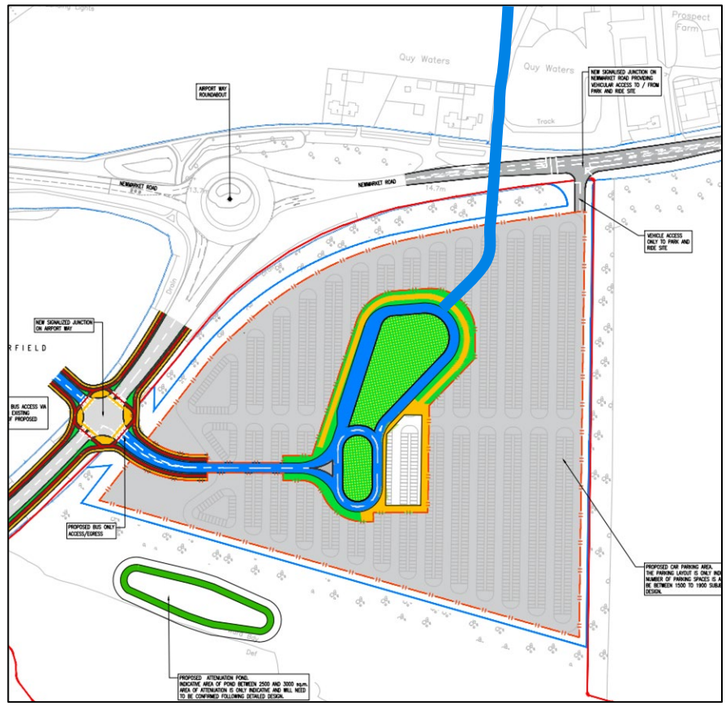
TRANSPORT

FURTHER GROWTH LEVERAGING INVESTMENT

The main site is well-positioned for a substantial first phase and a heavy rail station as part of EWR that would connect with the segregated rapid transit route. However, **additional growth would support further transport enhancements for the entire Local Plan**. Allocating the Cambridge East Expansion Land would likely **trigger the need for an orbital sustainable transport connection to the northern fringe**, which has been previously explored with various design options shared with Local Authorities.

This connection would significantly benefit the area by linking major Local Plan allocations, connecting homes, jobs, services, and facilities, and enabling agglomeration. It would also form a critical part of a future transit network, connecting GCP schemes to the north and west with the east, including the new railway station, creating a truly connected Greater Cambridge.

Marshall's modelling using CSRM showed significant benefits, such as people using Park & Ride facilities closer to their homes. While transport authorities could develop this link without the Cambridge East Expansion Land, its allocation would make the justification and funding for the project more apparent and justifiable.



Illustrative Adaption of Newmarket Road Travel Hub for Orbital Connection

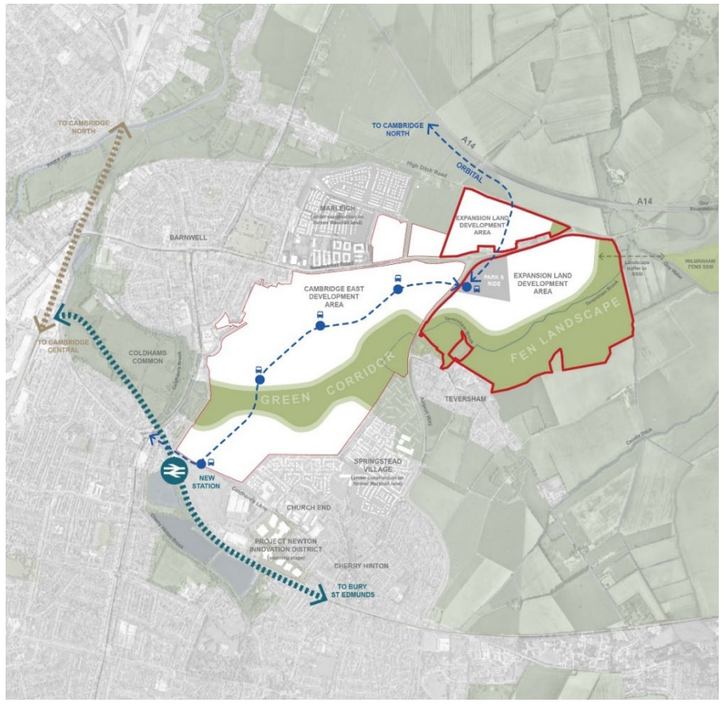
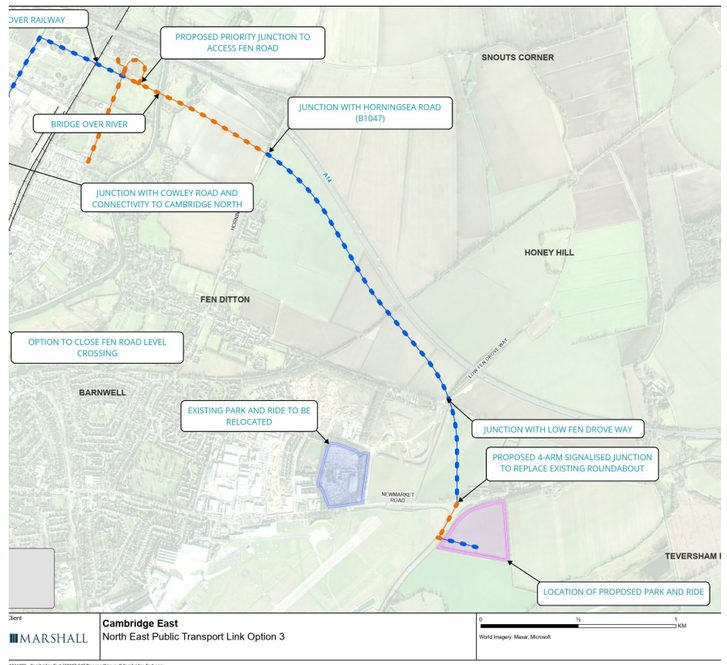
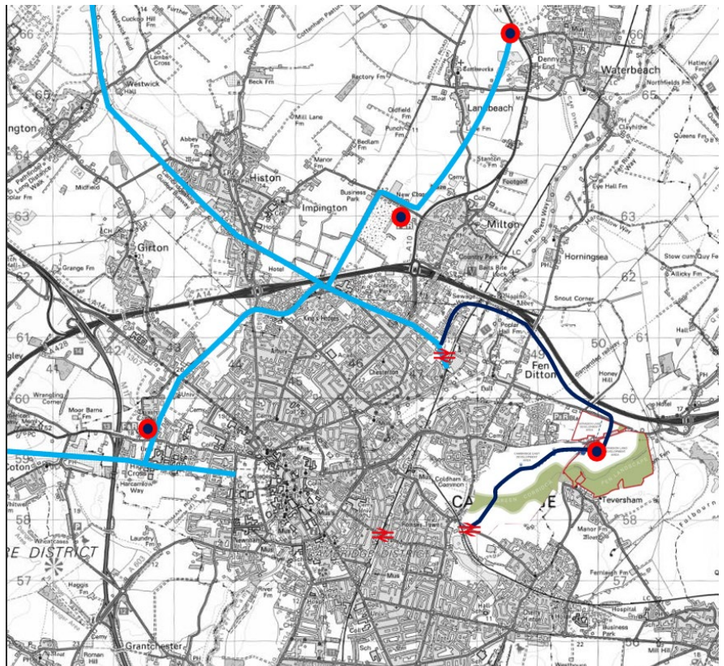


Illustration of Cambridge East Expansion Land as part of an integrated transport system



The Orbital Connection (1 option) connecting the Travel Hub to the NECAPP



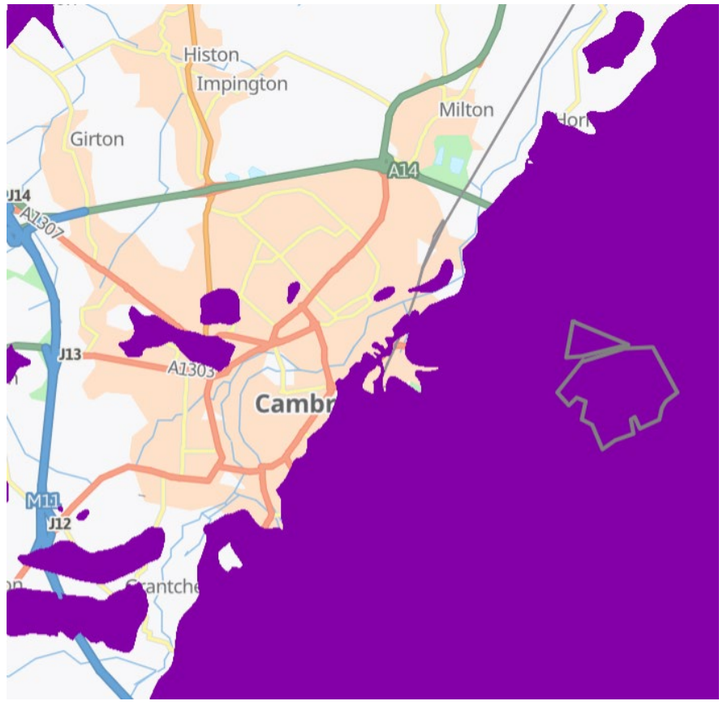
Cambridge East Expansion Land as a network

EXEMPLAR WATER MANAGEMENT

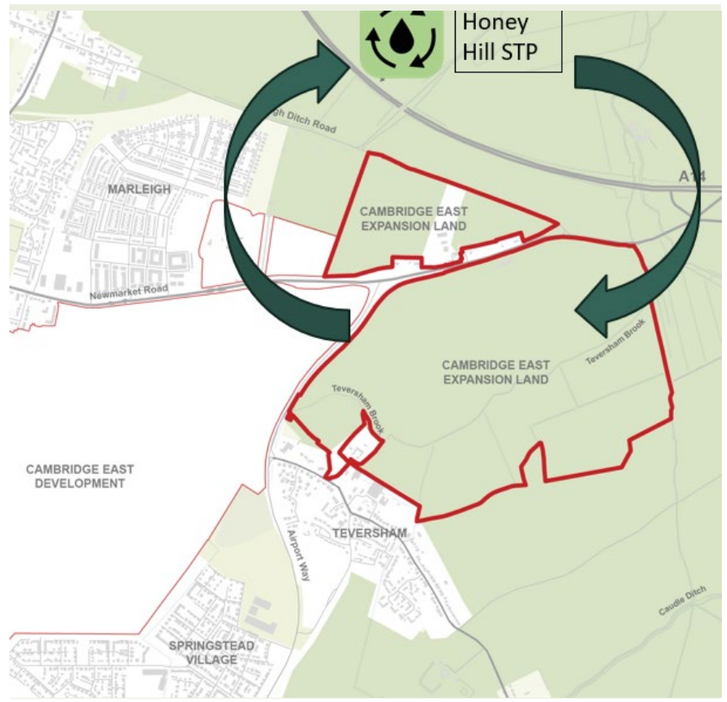
HOLISTIC APPROACH TO WATER CONSERVATION AND MANAGEMENT

The site is uniquely placed within Cambridge to deliver safe and resilient development whilst minimising impact of the water resources.

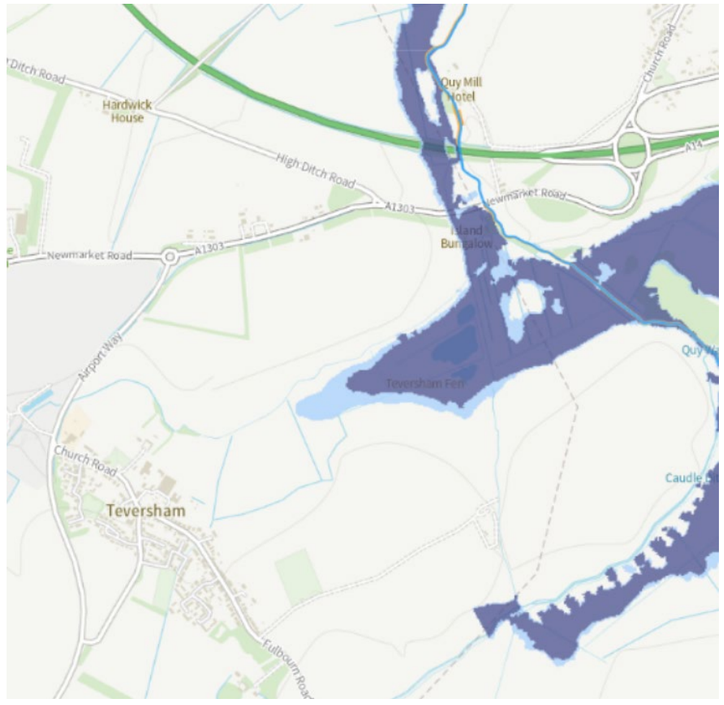
- Water Consumption can be minimised through design
- The proximity to Honey Hill makes strategic reuse of water an easy solution.
- Being located over the aquifer allows for the option for aquifer recharge to replenish the aquifer.
- Land for development located within Flood Zone 1 and therefore safe for all.



Site Located over the Aquifer to support water recharge



Strategic Re-Use of water from Honey Hill Recycling STP



Integrating Flood Risk into the master plan and green spaces



SUDS and Water Management embedded into the master plan
Image from CIRIA

CASE FOR GREEN BELT RELEASE

The **NPPF supports the opportunity to release Green Belt land** to meet needs, in sustainable locations:

- **Policy GB3(2)**: *"Exceptional circumstances in this context include a local planning authority being unable to meet its identified need for development in full…"*
- **Policy GB3(4):** *"Where a development plan's spatial strategy has identified suitable land around well-connected stations for development, exceptional circumstances do not need to be demonstrated to justify altering Green Belt boundaries."*
- **Policy GB4(1)(d)**: *"When defining Green Belt boundaries, whether as a result of altering or establishing Green Belts, local plans should:…d. Demonstrate that new Green Belt boundaries are broadly consistent with the spatial strategy for accommodating growth and meeting development needs across the plan area and adjoining areas, including those of any relevant spatial development strategies. This includes ensuring that any alterations to Green Belt boundaries promote sustainable patterns of development…"*

"Developments which would create a significant critical mass to fund and deliver new or enhanced infrastructure are more likely to be able to achieve delivery then dispersed options"
– GCSP Committee Report (January 2023)

- **Sustainability and carbon objectives** are at the head of the agenda for the emerging Local Plan
- Significant weight has to be attached to the conclusions from the evidence base which is clear that the options to disperse development away from the City score poorly in sustainability terms compared with **options which consolidate growth** around the existing built-up area
- Green Belt release in principle is necessary – the **expansion land at Cambridge East represents the most sustainable option**.



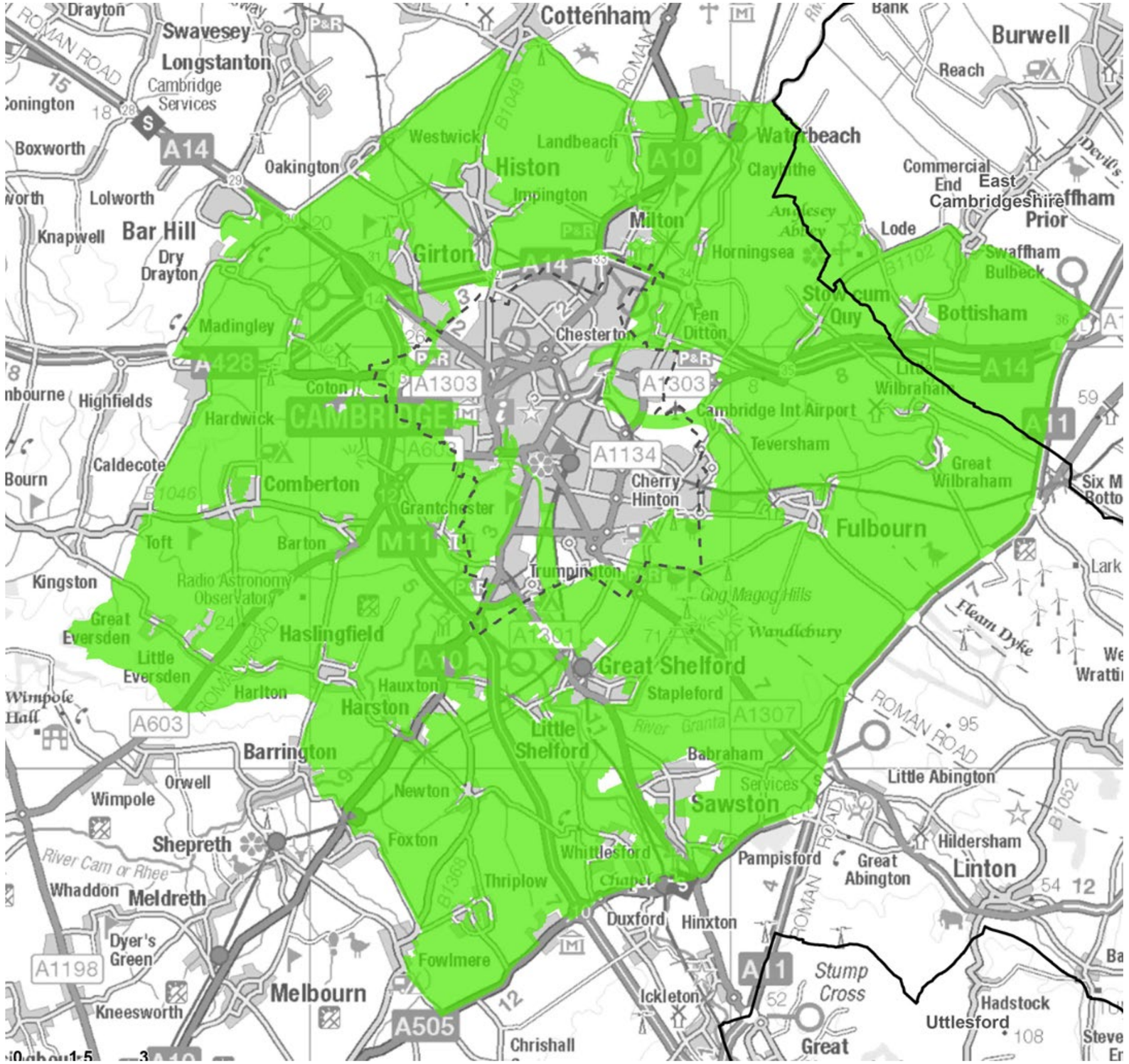
GREEN BELT RELEASE

LOCATION

Since its formation in the 1950s, the Cambridge Green Belt has expanded and **changed to suit the planning requirements of the City** and its districts.

In this constantly changing context, in various areas around the City, **new areas of development continue to alter the influence of the adjacent landscape** of the Green Belt on the setting of the City and changing the strength of the Green Belt's purpose.

Generally Green Belt studies acknowledge that **all Green Belt land surrounding Cambridge is of value and significance to the setting of Cambridge** and cannot be released without some harm to the Green Belt purposes set out in the NPPF.



Extent of the Green Belt in Greater Cambridge – Extract from Greater Cambridge Green Belt Assessment (prepared by LUC – August 2021)

GREEN BELT RELEASE

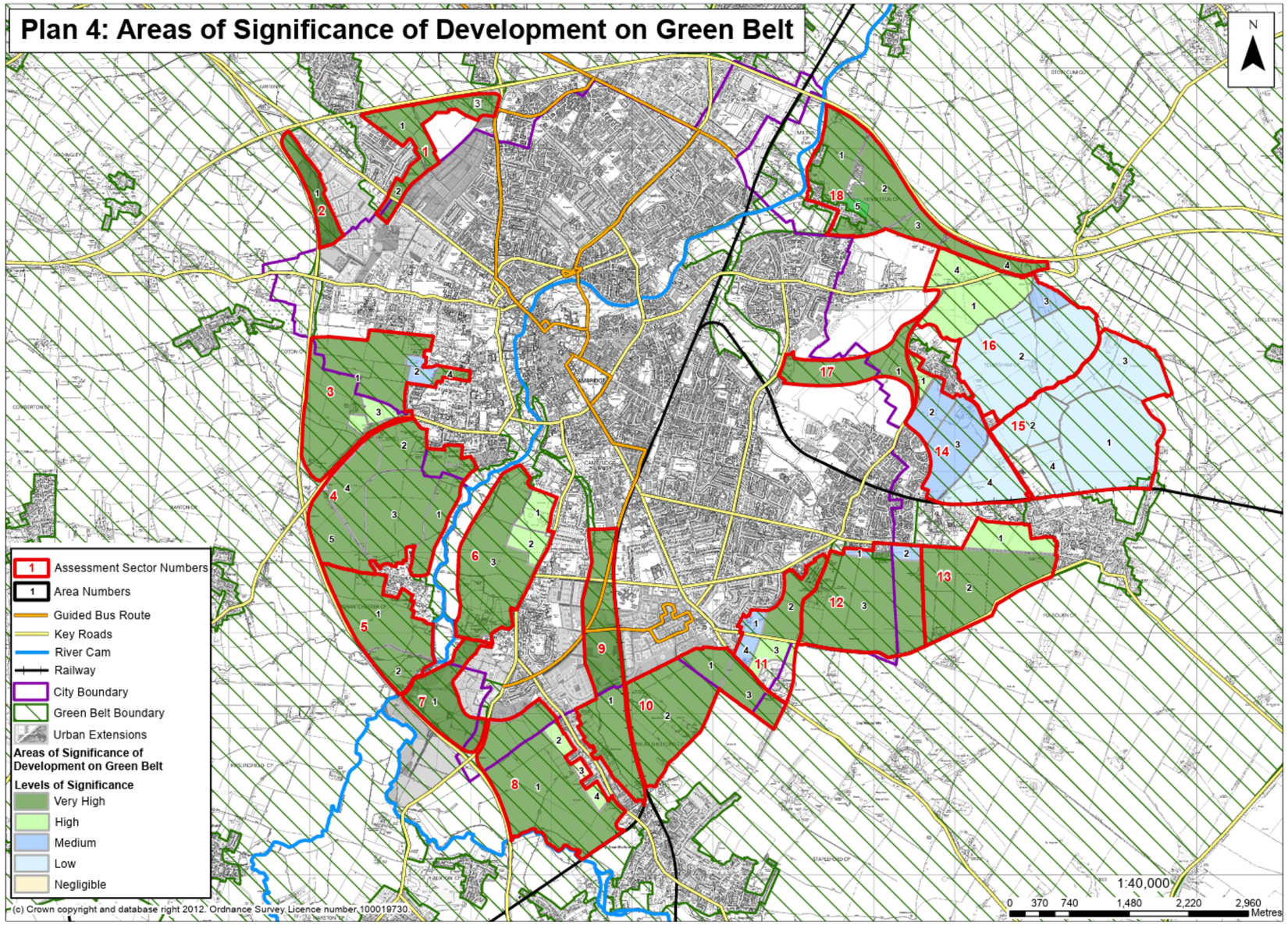
LOCATION

The Joint Inner Green Belt Boundary Study (2012) **assessed the impact of development on Green Belt parcels around the edge of Cambridge**. Key findings include:

- High significance of development impact on Green Belt land to the south, west, and some northern parcels of the city.
- **Lesser significance for some parcels to the east**.

If Green Belt land is released east of Cambridge, **careful considerations** are needed for the **setting and identity of Teversham village** and the **protection** of views to / from the **wider Fen landscape**.

Delivery of development on the safeguarded site and the relocated Park & Ride east of Airport Way will **increase urban influence**, with a reduction in the 'rural character' of the approach to the City from the east.



Areas of Significance of Development on Green Belt – Extract from the Inner Green Belt Boundary Study (prepared by CCC and SCDC – 2012)

GREEN BELT RELEASE

EXCEPTIONAL CIRCUMSTANCES

To date, **growth around Cambridge has not benefitted everyone equally** – the east is mostly residential which is reflected in higher levels of deprivation and unemployment.

Cambridge East provides an opportunity to provide employment space to address the inequalities in its own right – however, the expansion of the site to include land to the east would **provide the critical mass that unlocks the full scale of the opportunity** for sustainable growth.

As Cambridge East is already to be developed, a **unique opportunity arises to plan the urban expansion** east of Airport Way and north of Newmarket Road to **ensure maximum integration and synergy.**

ENHANCEMENTS

To facilitate the release of the Expansion Land for development, any emerging policy and future planning application would need to be formulated, based on the development of **a landscape-led masterplan with high sustainability credentials.**

This would need to include a **strong buffer of Green Infrastructure** that would **maintain physical and perceptual separation** from the necklace villages of Teversham and Stow cum Quy, providing a strong edge to the Green Belt and reducing the visual effects of the eastern suburban edge of the City in views from east and northeast.

Slides 12 - 14 identify some of the GI opportunities that could be incorporated as part of the Cambridge East expansion land.



SUMMARY

If the Councils are committed to capitalising on the economic potential of Cambridge and are to align with CGC's ambition for growth, this cannot be reasonably achieved without the release of Green Belt land.

Green Belt parcels to the east of the City have been identified in the evidence base as having lesser significance than parcels on the south, west and north edges of the City.

Views of the east of the City are already heavily influenced by the presence of the hangars and the development of Cambridge East, plus the new Travel Hub (promoted by GCP) east of Airport Way, will increase urban influence on Green Belt parcels on the east.

The preparation of a new Local Plan gives GCSP the opportunity to consider a review of the Green Belt boundaries – **the Expansion Land is an appropriate and sustainable place to release Green Belt land.**

Cambridge East is **one of the few locations that can accommodate the scale of growth needed** to meet the ambitious economic growth targets and simultaneously contribute to meeting the housing needs of local people. The opportunity should be optimised.

An initial capacity testing exercise identifies that the Cambridge East Expansion Land could accommodate in the region of **2,750 – 3,250 new homes and 2,000 jobs**, on top of those to be delivered at Cambridge East.

A new station east of Cambridge is proposed as part of EWR's Development Consent Order application – therefore further increasing the site's sustainability credentials and the opportunity to plan at scale on the east side of Cambridge.

The critical mass generated by development on the expansion land would enable **transformative growth, connected green infrastructure and sustainable transport connections** to be delivered.

Appendix 3 – Fully Tracked Version of Draft Policy S/CE: Cambridge East

Cambridge East

Policy S/CE: Cambridge East

1. A new city district of ~~approximately~~ a minimum of 8,000 homes delivered from 2032, subject to the necessary water infrastructure being available, significant employment floorspace in use classes E(g) and approximately 20,000 square metres gross internal area (GIA) of B2/B8 employment floorspace, with a range of supporting services and facilities including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the Site Allocation boundary identified on the Policies Map.

2. ~~A site wide masterplan will be prepared by the landowners and/or promoters in conjunction with the Council and in consultation with the local community and other stakeholders. The masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 53 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the Council).~~

3. Given the scale and long term construction of the development, a site wide Place Book shall be prepared to establish the vision, place-making objectives and quality expectations for the new community and guide future Reserved Matters applications. The Place Book will include the Parameter Plans and Strategic Design Code and will be submitted and approved as part of any outline planning application. ~~and provide the foundation for the site wide masterplan and d~~Design codes for future Reserved Matters Applications ~~. The design code~~ will ensure that each phase of development positively contributes towards the high-quality placemaking outcomes expected from the Place Book.

Objectives and place identity

4. Cambridge East will be a vibrant, inclusive new city district that reflects the spirit of Cambridge while helping to shape its future. Rooted in a unique setting, Cambridge East will offer welcoming, walkable neighbourhoods which support an intergenerational community to live well, work purposefully, learn, and thrive.

5. A vibrant urban quarter will form the heart of this well-connected mixed-use district, bringing together cultural and commercial space, including research and development, to foster economic opportunity, collaboration and innovation. Green streets, public spaces and a new Cambridge Common will connect communities, promote wellbeing and support nature recovery. Excellent sustainable transport links will ensure seamless access to the city and beyond.

6. Guided by design excellence, environmental responsibility, and long-term stewardship, Cambridge East will ~~set new standards for sustainable, high-quality placemaking.~~ deliver a high-quality, sustainable new urban quarter that exemplifies the principles and standards of the Greater Cambridge Local Plan.

Cambridge Airport

Uses

7. Cambridge East is allocated for mixed-use development as shown on the Policies Map and indicative Spatial Framework comprising:

   a. ~~Approximately~~ A minimum of 8,000 homes (to deliver 3,950 dwellings to 2045 subject to the necessary water infrastructure being available) of a range of sizes, types and tenures to meet the identified diverse housing needs and to support a mixed and balanced intergenerational community, specifically including:

      i. A total of 24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches, each on approximately 1 hectare of land) located within but on the edge of the development, or outside but in close proximity to the site, meeting requirements of Policy H/GT; and

      ~~ii. 10% of the approximately 8,000 homes as specialist accommodation (within use classes C2 or C3), particularly for older people or those with disabilities.~~

   b. Significant employment floorspace in use classes E(g), including offices and research and development as a key part of a new mixed use district centre and at other key locations where they are supported by good accessibility, recognising the site's potential to provide a new key location for businesses within Greater Cambridge's knowledge economy, as well as a minimum of 20,000 square metres (gross internal area) B2/B8 employment floorspace with good access to the road network to provide for mid-tech and general industrial uses;

   c. Each phase must ~~deliver a mix of uses to co-locate~~ ensure that residential uses have suitable access to other non-residential ~~with~~ amenities;

   d. Provision of sports and leisure facilities, ~~including as a minimum~~ which may include:

      i. A ~~50 metre x 10 lane regional~~ swimming pool ~~preferably located opposite the Ice Rink~~;

      ii. An indoor sports hall ~~co-located with the swimming pool as part of a new leisure hub or regional indoor sports centre~~; and

      iii. Outdoor pitches provision including a range of pitches including football, youth football, rugby, hockey and cricket pitches plus changing facilities.

   e. Provision of ~~a regional~~ cultural ~~hub~~ facilities that will complement and not compete with Cambridge city centre. This ~~will~~ may include but not be limited to provision of a creative hub comprising a mix creative work, production and leisure spaces, and a community arts centre; and

   f. A range of supporting services and facilities to meet the day-to-day needs of those living, working, visiting, travelling through and attending education there, including cultural, leisure, nursery, primary and secondary schools, health, community and library space, faith and retail uses. These uses will be delivered at a series of walkable and wheelable ~~neighbourhood~~ local centres.

The development of Cambridge East must do the following:

Context

8. Establish a strong landscape-led framework to guide the structure of development and shape the relationship between the new city district, the existing urban edge and the wider landscape, supporting its identity and a well-considered transition between existing and proposed built form, settlement edges and the wider landscape.
9. Create a well-considered eastern approach to Cambridge that:
    a. ~~Is sensitive to~~ Considers local townscape, landscape, strategic views, dynamic views and heritage assets, including the rural setting of the village of Teversham, the Teversham Conservation Area and the wider countryside to the east; and
    b. Integrates well with established and new neighbouring communities, including Marleigh and Springstead Village.
10. Establish a strategy for the conservation and enjoyment of the historic environment which:
    a. Celebrate and integrates heritage assets, including ~~at least~~ the control and office building and its setting, and considers the retention, adaption or other appropriate treatment of any other ~~historically significant~~ buildings identified through detailed assessment as having heritage significance;
    b. Responds positively to heritage character;
    c. Creates a well-composed setting and landscape around heritage assets;
    d. Manages building scale sensitively; and
    e. Delivers viable and sustainable uses ~~consistent with their conservation~~ for retained heritage assets, where appropriate, having regard to their significance and the findings of a detailed heritage assessment.

Built form

11. Adopt a distinctive approach to urban design which:
    a. Promotes ~~the~~ high~~est~~ standards of sustainability and liveability;
    b. Reflects Cambridge's identity by respecting the city's design traditions while embracing modernity; and
    c. Embraces innovative approaches to foster an inclusive, vibrant and diverse community of all ages, creating a strong sense of place and belonging.
12. ~~Through the masterplan for the site, agree an~~ Develop an appropriate scale, layout and density of development that:
    a. Supports liveability and accessibility in a compact, walkable and sustainable urban form, maximising the opportunity provided by the site;
    b. Provides appropriate connections between neighbourhoods, public spaces, cultural and educational facilities, promoting active travel and public transport use; and
    c. Creates and, where appropriate, reinforces local character and architectural quality,

providing ~~smooth~~, well-designed transitions in scale to respect and complement the surrounding context.

13. ~~Through the masterplan for the site, agree~~ Demonstrate appropriate variation in building form, scale, height, massing, and density to shape a distinctive city district by:
    a. Providing taller buildings including in appropriate locations to mark key spaces, enhance wayfinding and complement the Cambridge skyline;
    b. Utilising innovative approaches to development typologies to define character areas;
    c. Responding to key views and approaches to the site; and
    d. Using appropriate density profiles to support accessibility to mobility hubs, the district centre and local centres.
14. Use ~~the~~ high~~est~~ quality materials and detailing to ensure durability, environmental performance and design excellence, supporting climate resilience.

Public space

15. Deliver an eastwards extension to Coldham's Common using the g~~G~~reen ~~Belt~~ corridor, which must:
    a. Be multifunctional and vary in form and character along its length;
    b. Ensure that active travel and recreational uses are sensitively designed to maintain a semi-rural landscape with a mosaic of habitats, including neutral grassland, native scrub, hedgerows, woodland, and wetland, in the tradition of the Cambridge Commons;
    c. Open to a greater width at the Teversham end, maintaining a clear gap between Cambridge and Teversham, protecting the village's identity and character, heritage assets and rural outlook and setting by providing an informal countryside character; and
    d. Connect to strategic green infrastructure beyond the site.

Nature

16. Create a strong and varied framework of green infrastructure throughout the development that optimises biodiversity value and connects to existing habitats and green infrastructure in the surrounding area, including:
    a. Establishing an integrated framework of open spaces, green corridors, and green infrastructure across the new city district, delivering a landscape resilient to climate change. This must:
        i. Integrate with any required urban drainage measures;
        ii. Embed nature friendly green spaces into development parcels as well as within the green corridor; and
        iii. Appropriately balance ecological enhancements and protection with amenity uses, sports, recreation and play.

b. Enhancing ecological links to existing habitats beyond the site boundary, responding to the strategic priorities for this area of the Local Nature Recovery Strategy and Cambridge Nature Network; and

c. Connecting to and ~~providing~~ facilitating the delivery of green infrastructure beyond the site, where appropriate, to meet ~~that will meet~~ the needs of all ages and abilities and mitigate recreational pressure arising from the development on more sensitive sites including Wilbraham Fen SSSI and Stow-Cum-Quy SSSI. This must:

   i. Provide or support access to semi-natural accessible green space within and directly adjacent to the site, including enabling circular recreational routes of various lengths;

   ii. Enable a seamless strategic green connection that sensitively embeds and integrates existing and new recreation routes between the site and the Wicken Fen Vision area; and

   iii. Contribute towards the creation of strategic scale green infrastructure associated with the Wicken Fen Vision.

Movement

17. Ensure an exemplar approach to movement and transport within and through the site, transforming the wider connectivity of the eastern edge of Cambridge and promoting a low car living approach where 'walking and wheeling' are the first choice for most residents, workers and visitors from the outset, by:

    a. Ensuring the design of the site:

       i. Provides a series of well connected 'walkable neighbourhoods', each capable of meeting everyday needs locally, supported by clear and legible routes and effective wayfinding within and between neighbourhoods;

       ii. Integrates direct, safe, and efficient bus and other public transport routes, ensuring that all development is located within reasonable walking distance of mobility hubs served by high quality public transport;

       iii. Provides walking, wheeling and cycling connections throughout the site linking to wider routes enabling sustainable and active journeys to be made between Cambridge East and other key destinations;

       iv. Provides vehicular access into distinct low traffic neighbourhoods which are not linked for general traffic; and

       v. Promotes low car ownership including through restrained parking provision and innovative approaches such as leasing or sale of car parking to occupiers, and to car storage, including off-plot car barns and shared parking solutions.

    b. Setting aside land for and directly delivering the following physical transport measures within the site:

       i. Enhanced pedestrian, wheeling and cycle connectivity to wider strategic routes;

       ~~ii. Upgraded active travel infrastructure along Coldham's Lane;~~

       iii. A high-quality public transport route through the site that connects the ~~relocated~~

~~Newmarket Road Park and Ride with the city centre, serving~~ new Newmarket Road Travel Hub with Coldhams Lane, Springstead Village and other mobility hubs at the district and ~~neighbourhood~~ local centres within the site, and that is designed to be capable of integration with a new Cambridge East railway station;

iv. A network of mobility hubs at key interchanges; and

v. ~~A network of d~~Delivery and consolidation hub or hubs and a last mile delivery system.

c. Making financial contributions towards or ~~and~~, as appropriate, enabling the following transport measures external to the site:

i. Newmarket Road Travel Hub including ~~R~~relocation of Newmarket Road Park and Ride to a site south of Newmarket Road and east of Airport Way;

~~ii. Cambridge Eastern Access Phase A;~~

iii. A package of bus service enhancements, or other public transport modes where appropriate, connecting the site with North East Cambridge, West Cambridge, Cambridge City Centre, Cambridge railway station and the Cambridge Biomedical Campus;

~~iv. A high-quality public transport scheme, linking the high-quality public transport route within the site to the city centre; and~~

v. Active travel enhancements to wider connections linking with key destinations including Cambridge railway station, City Centre and onwards to West Cambridge and wider destinations on radial high quality public transport corridors (HQPT); Cambridge Regional College, North East Cambridge and Cambridge North Station; Cambridge Biomedical Campus, Cambridge South Station and Cambridge Leisure site; and

vi. Upgraded active travel infrastructure along Coldham's Lane.

18. The ~~agreed masterplan~~ planning application for the site must demonstrate how:

a. The distribution and mix of development achieves optimal transport outcomes, including high levels of site and city trip internalisation and high active and public transport mode shares; and

b. The quantum and mix of development can be delivered within ~~the agreed~~ an appropriate trip budget. A definitive trip budget based on detailed evidence must be agreed with the Local Highways Authority ~~prior to submission~~ as part of the outline application. 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.

19. ~~To support delivery of the agreed masterplan, a~~ A strategic and local transport mitigation plan must be prepared by the developer as part of the planning application for agreement with the Local Highways Authority and Local Planning Authority. The plan shall be informed by the transport vision for the development and the wider transport strategy for Greater Cambridge and may be refined through a vision and validate approach, supported by monitoring and phased implementation, as further evidence and strategic transport interventions emerge. This must include:

a. Active and public transport measures;

b. Vehicular transport measures, including site access arrangements;

c. A comprehensive parking strategy aligned with low-car living objectives;

d. Infrastructure costing and delivery phasing, demonstrating how the necessary transport measures identified above will be delivered at a time that enables optimal transport outcomes and remains within the agreed trip budget; and

e. Mechanisms for delivery, monitoring and review including potential delivery through Section 106 obligations, or CIL or other appropriate funding mechanisms.

Cambridge East station

20. Masterplanning and development delivery must realise the strategic opportunity presented by Cambridge East railway station by ensuring that it:

    a. Does not prejudice the delivery, operation or accessibility of the future station and associated rail infrastructure being promoted through a separate statutory consent process;

    b. Establishes a movement network, land use pattern and development density capable of supporting and benefiting from the railway station;

    c. Enables ~~Aligns~~ the district centre and surrounding higher-density mixed use development to be located and designed to achieve high levels of accessibility to a potential station location;

    d. Prioritises direct, safe and legible walking, wheeling, cycling and public transport connections between neighbourhoods, the district centre, and mobility hubs including the railway station; and

    e. Enables early phases of development to function effectively in advance of station delivery whilst remaining capable of integration with future rail services.

Resources

21. Development must integrate Sustainable Urban Drainage Systems and flood mitigation measures as both functional and amenity features within the design of landscapes and open spaces, including daylighting culverts where feasible.

22. Development should not preclude operation and maintenance of sewer pumping stations located within or adjacent to the site.

23. ~~Conditions are likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the Local Planning Authority is satisfied that there is scope for earlier development.~~

Lifespan

24. In addition to the requirements of the validation checklist, the following will be required at the submission of an outline or major planning application:

a. An overall illustrative masterplan, ~~setting out the final capacity and mix of uses on site~~ and demonstrating for indicative purposes how the proposed development meets the requirements set out in this policy;

b. A place book to include the strategic design code~~s~~ and parameter plans, which will include some indicative principles relating to key site ~~requirements~~ considerations such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment;

~~c. Parameter plans, to fix key site requirements such as access and movement, land uses, green and blue infrastructure, scale and massing and densities. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment;~~

d. A strategic and local transport mitigation plan; and

e. Other supporting strategies that will include but are not limited to:

   i. A community development plan;

   ii. A district centre strategy;

   iii. A phasing and delivery strategy; and

   iv. A stewardship strategy, which must set out short- and long-term arrangements for the management, maintenance, and governance of public spaces, community assets, and infrastructure. The strategy should be proportionate to the scale and complexity of the new city district, be clearly integrated with the overall phasing and delivery strategies and should incorporate processes and structures to ensure the active and informed involvement of residents.

25. The illustrative masterplan and strategic design code will be subject to community and other stakeholder engagement and critical review by the Cambridgeshire Quality Panel (or successor body) as part of their development and refinement.

26. ~~Subsequent reserved matters applications for full planning permission will only be determined once the supporting strategies have been approved, and future applications will need to demonstrate compliance with these strategies and the outline approval. More focussed design codes for specific neighbourhoods should be prepared and submitted as part of the reserved matters applications, in line with any relevant conditions in the outline approval.~~

27. Depending on the development programme, the applicant may develop a reserved matters scheme alongside the outline as a means of testing the emerging parameter plans and design code.

28. Early delivery of infrastructure must be agreed with the Local Planning Authority having regard to the Infrastructure Delivery Plan, including:

    a. Key public transport, walking and cycling routes to embed sustainable travel habits; and

    b. Strategic green infrastructure provision, creating habitats, providing access to green space for new residents and extending the green network available to the city.

Delivery

29. 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.

30. 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).

Marleigh and Springstead Village

31. The development of Marleigh and Springstead Village must:

    a. Ensure development proposals are in accordance with the approved masterplan and design code;

    b. Undertake meaningful engagement with local people and stakeholders at the relevant Reserved Matters stages.

32. Marleigh will deliver (and not exceed the specified maximum floorspace) the following development:

    a. Up to 1,300 residential homes;

    b. Primary school (F1), potentially including community hall – 2.3 hectare primary school site;

    c. Community hall of 200 square metres gross internal floorspace (excluding any parish office);

    d. Foodstore (E) – Up to 1,500 square metres gross internal floorspace;

    e. Petrol Filling station;

    f. Flexible mixed-use units (E, F1, F2) – Up to 3,000 square metres gross internal floorspace;

    g. Park pavilion comprising: café, public wc's, park store, offices, and gym (E, F2 and sui generis) – 2,600 square metres of which 1,600 square metres offices gross internal floorspace;

    h. Sports pavilion (F2) – 200 square metres gross internal floorspace;

    i. Allotment clubhouse and amenities (F2) – 200 square metres gross internal floorspace; and

    j. Replacement car dealerships (sui generis) – up to 4 hectares.

33. Springstead Village will deliver (and not exceed the specified maximum floorspace) the following development:

a. Up to 1,200 residential homes, including up to 90 bed spaces in a retirement living facility;

b. Primary school – 2.3 hectare site;

c. Secondary school – 6.9 hectare site;

d. Flexible mixed-use units – Classes E, F2, sui generis within local centre up to 1,850 square metres gross internal floorspace, including:

    i. Food store (E) up to 500 square metres gross internal floorspace; and

    ii. Community hall (E) up to 250 square metres gross internal floorspace.

34. In addition to development delivered via the permissions set out above, Springstead Village is allocated for approximately 350 additional dwellings within the red line boundary for the site.

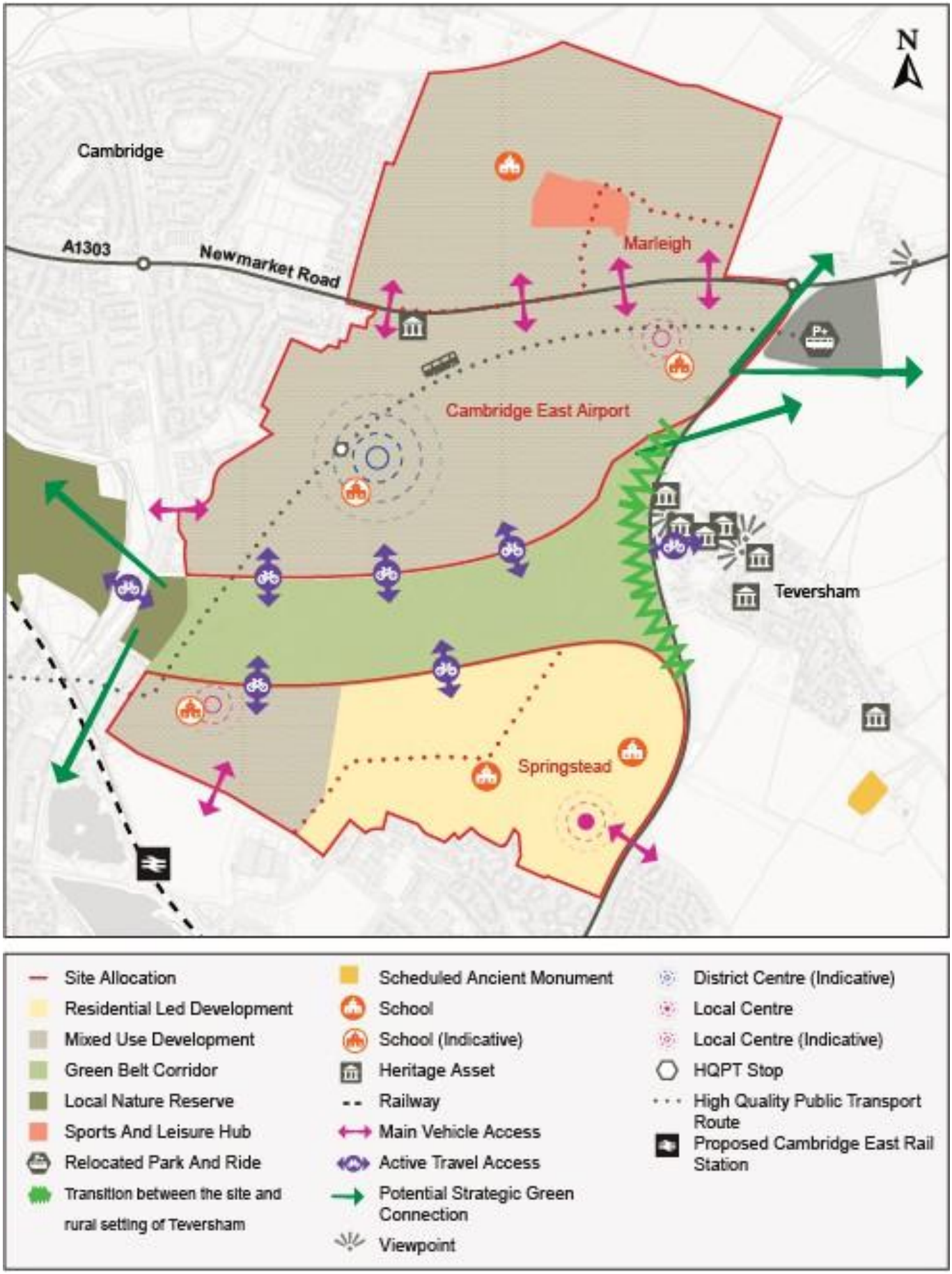


Figure 53: Indicative Spatial Framework for S/CE: Cambridge East

Supporting information

3.2.3 This policy is required to enable the continued development of the site as a comprehensive new city district, to ensure the development of the airport site will integrate with Marleigh and Springstead Village, as originally envisaged in the Cambridge East AAP. The policy seeks to reflect the significance of the opportunity that this site offers to provide a sustainable new city district for East Cambridge that is transformative for the city.

3.2.4 Underpinning the future development will be a place book. It will establish a shared vision for the site and articulate the place-making principles, outcomes and quality expectations that will guide its planning, design and delivery. It will set out the characteristics, ambitions and defining qualities that are intended to shape Cambridge East, whilst demonstrating how key themes such as movement, green and blue infrastructure, land use, community infrastructure, health and wellbeing, climate resilience, governance and stewardship should work together to create a sustainable, distinctive and well-connected place.

3.2.5 The place book will provide the foundation for subsequent spatial planning and design work, ~~informing the preparation of a site wide masterplan, together with parameter plans, a strategic design code, place briefs and detailed design codes. These documents will~~ through future Reserved Matters Applications. It will include parameter plans and a strategic design code to translate the vision, principles and outcomes established through the place book into a coherent spatial structure and development framework capable of phased implementation whilst maintaining a consistent and high-quality sense of place throughout the lifetime of the development.

3.2.6 The indicative Spatial Framework for Cambridge East sets out an indicative high level illustration of the policy requirements that are location-specific within the site. Noting remaining uncertainties regarding the type, mix and siting of development, in particular that a masterplanning exercise has yet to be completed by the landowner, the framework is subject to change.

3.2.7 Cambridge East is an important location for meeting Greater Cambridge's long-term housing needs, including those for specific groups such as older people, those with disabilities and travellers. For employment, the site is well located to be successful as a significant scale new cluster for office and laboratory space in the eastern part of the city, and has a key role to play in meeting Greater Cambridge's significant need for industrial space, being well located to meet demand for mid-tech and general industrial uses.

~~3.2.8~~ The development should contribute to wider leisure and cultural provision in Cambridge. To diversify the offer for both leisure and culture and contribute to creating spaces for creative industries to grow. This should include developers engaging with local creative production groups to provide a mix of creative work, production and leisure spaces, including provision of a community arts centre. The development of this will be supported by a number of local stakeholders. The provision of the swimming pool at Cambridge East would be delivered by the Council with S106 contributions from developers at Cambridge East. ~~predominantly for a 4-lane 25 metre swimming pool~~

3.2.9 ~~contribution to the 10-lane regional swimming pool located at Cambridge East.~~ This would also be part funded by S106 contributions from across Cambridgeshire and third party funding, such as Sport England.

3.2.10 In addition to the above, the Greater Cambridge Infrastructure Delivery Plan (IDP) (2026) has identified that the site will require: two new primary schools with integrated nurseries; two new secondary schools; a new healthcare facility, ~~approximately 1,250 square metres~~ community space, and ~~440 square metres~~ library space ~~to be delivered as a key library~~; a fire operational drop off point; and a sports hall ~~(4 badminton court sizes)~~, to support the delivery of the site during the plan period and beyond. The exact quantum and phasing of infrastructure will need to be kept under review as the development comes forward, including phases beyond the plan period. This should be informed by on-going engagement with statutory bodies and undertakers.

3.2.11 The policy sets out clear expectations for placemaking and the elements needed to deliver an exemplar development. Achieving a sensitive relationship between this site and its context will require careful consideration, recognising both the scale of opportunity, but also the need to respond to the existing townscape and landscape, including integrating well with Marleigh and Springstead Village, and ~~being sensitive to~~ considering retained historic assets on the site, the setting of Teversham Conservation Area, and with the wider townscape and landscape. Development should be of a density to support liveability ~~while enforcing local character~~ and architectural quality, ensuring taller buildings make a positive contribution to the Cambridge skyline ~~in line with the Greater Cambridge Skyline and Tall Buildings Strategy~~.

3.2.12 Cambridge East has a long history of aviation which contributes significantly to the character and identity of the site. The Listed Control and Office Building is a designated heritage asset whose retention and appropriate setting should be conserved and enhanced through redevelopment. The site also contains a range of other potential designated or non-designated heritage assets associated with former airport uses. The significance and appropriate treatment of these assets will be informed by further heritage assessment and ongoing engagement with the Councils and Historic England. Development proposals should respond positively to the site's aviation heritage and historic environment as part of the masterplanning process.

3.2.13 Reflecting and maintaining an important part of Cambridge's identity, the site will ensure an extension of Coldham's Common eastwards using the Green Belt corridor. The corridor's Green Belt designation reflects its wider structural significance within Cambridge as forming one part of a green corridor into Cambridge – a key feature of the historic city. The current boundaries of the Green Belt corridor are retained for the purposes of this Local Plan. The current boundaries reflect a uniform width of the Green Belt corridor of 300 metres over its whole length. When the Cambridge East development is built out, it is not necessary or expected that the Green Belt corridor will be of that or any uniform width, indeed it is not considered appropriate for the corridor to take that form.

3.2.14 As envisaged in the Cambridge East AAP including the inspector's report, the ultimate boundaries of the ~~Green Belt~~ green corridor in this area are expected to be an output of a masterplanning exercise, which ~~has yet to~~ will be completed as part of the

planning application. As such, the ~~current~~ precise alignment, extent and boundaries of the Green Belt corridor ~~will remain unchanged in this Local Plan but, following completion of the masterplan planning exercise, precise boundaries to reflect the masterplan will be confirmed via a review of the Local Plan. In the event that the masterplanning exercise is completed and a planning application for development affecting the green corridor is made before the conclusion of a review of the Local Plan, any development within the corridor will be determined having regard to extant development plan and Green Belt policy~~be determined through the masterplanning exercise and secured through subsequent planning permissions.

3.2.15 If it is demonstrated via the masterplanning process that adjustments to the alignment or extent of the green corridor are necessary ~~locating some development within the retained Green Belt corridor is necessary~~ to achieve high quality placemaking, ~~this may amount to a consideration that could in principle contribute to a finding of very special circumstances to justify grant of planning permission for that development. In such a case,~~ it will be necessary to show, as part of any planning application, that the function of the ~~Green Belt~~ green corridor is maintained or enhanced. ~~Should the masterplan result in development encroaching on the current Green Belt corridor, there may be a requirement for additional widening of the corridor elsewhere in order to maintain the Green Belt function of the corridor. The physical boundaries of the Green Belt corridor should be considered and determined through the masterplanning exercise.~~

3.2.16 The recreational demands for green spaces arising from residents and workers at Cambridge East will be significant. Responding to this, the policy requires provision of green infrastructure throughout the site. In addition, to provide for recreational demands arising from residents and workers here – in particular to limit additional recreational pressure on the nearby Wilbraham Fen SSSI and Stow-cum-Quy SSSI – there is a need to ~~provide~~ facilitate recreational routes of different lengths for walking, wheeling and riding in all directions adjacent to development at Cambridge East. The green corridor will play a key role in meeting such needs but there is also a need to enable routes in other directions adjacent to the site. Beyond this, and noting the need to avoid directing significant numbers of visitors to Wilbraham Fen, the main opportunity to provide strategic scale off-site green space is to the north of the A14, associated with the Wicken Fen Vision. The National Trust is setting out clear plans to deliver green connections and space around Anglesey Abbey to deliver on this Vision in the coming years. The policy therefore requires development both to make a clear recreational connection towards that area, and to contribute financially towards the project, noting that the land in this area is beyond the control of the landowner at Cambridge East.

3.2.17 The policy sets out expectations to enable movement around the new city district and beyond to destinations such as Cambridge city centre, without overburdening the existing network and in a sustainable way. It is imperative that the mix of development supports an intergenerational community and achieves optimal transport outcomes including high levels of site and city trip internalisation and high active and public transport mode shares. The vehicular 'trip budget' referred to in the policy is a critical tool for achieving this. ~~The indicative trip budget is approximately 1,500 trips in the AM peak and 1,800 trips in the PM peak.~~ The trip budget will be ~~refined~~ agreed as part of the outline planning application when ~~as~~ more detailed evidence is completed, and a strategic and local transport mitigation plan must be

prepared to demonstrate the necessary measures for the development to achieve the resultant sustainable travel mode shares. Among other elements, this transport mitigation plan must include a parking strategy to demonstrate appropriate provision of cycle and car parking, including models of operation, such as rental of residential car parking to discourage private car ownership, and the accommodation of micromobility parking at key locations. It is noted that extant trip making from the site can be used to support a first phase of development. Monitoring will ensure full accountability and if necessary further mitigation, or refocussed mitigation which may be needed to ensure that overall compliance with the trip budget is achieved. The full detail of these mechanisms will be established in the S106 obligations entered into on the grant of outline consent.

3.2.18 The Cambridge East allocation recognises the strategic opportunity presented by a potential Cambridge East railway station promoted through the East West Rail programme. The delivery of any new station and associated rail infrastructure will be subject to a separate statutory consent process outside the control of the Local Planning Authority. Accordingly, the allocation does not depend upon delivery of the station in order for development to proceed or function effectively.

3.2.19 Notwithstanding this, any future masterplan will need to respond positively to the potential future station by safeguarding its delivery, ensuring development does not prejudice future rail infrastructure, and establishing an urban structure capable of supporting rail connectivity should it come forward. The spatial strategy and movement framework in such a masterplan must retain sufficient flexibility to ~~integrate~~ retain strong connectivity to a future station. Higher-density mixed-use development, including the district centre, should be capable of aligning with a potential station location to the south of the allocation, supporting transit-oriented development principles while ensuring early phases operate successfully in advance of any station delivery.

3.2.20 Such an approach will maximise long-term sustainable transport opportunities, improves accessibility across the eastern edge of Cambridge, and ensures the allocation remains effective and deliverable irrespective of the timing of the separate rail consent process.

3.2.21 The final phase of Marleigh was granted planning permission in July 2025 (23/04930/REM & 23/04936/FUL) taking to overall development to 1,391 dwellings, slightly more than granted in the consented 1,300 in the outline application (S/2682/13/OL). Springstead Village was granted outline planning permission for residential-led development with up to 1,200 dwellings (18/0481/OUT & S/1231/18/OL) in 2020. A reserved matters application for Phase 4 (23/03347/REM) was approved in April 2024. (Note: subsequent to the planning permissions being granted planning use classes have been updated; the updated use classes are referenced in the policy). Construction work has commenced on both sites, and some homes are occupied. In addition to the consented development at Springstead Village, engagement with the developer confirms that an additional 350 dwellings can be delivered within the existing red line boundary whilst still meeting the requirements of the permission.

3.2.22 These sites were able to progress as early phases of the full development that could come forward while the airport is still operational. Any future development proposals must be in accordance with the approved masterplan and design code.

Proposals at Springstead Village (formerly known as Land North of Cherry Hinton) must also have regard to the Land North of Cherry Hinton Supplementary Planning Document, adopted in December 2018.

3.2.23 The Grafham Water Transfer is anticipated to be operational from 2032, supplying additional water to Greater Cambridge and easing resource pressures. The housing trajectory accompanying the plan anticipates housing completions from 2032. However, ongoing masterplanning and delivery work may identify opportunities to accelerate development and bring forward earlier housing completions, particularly where development can proceed without affecting the continued operation of the airport and where such acceleration supports the timely delivery of new homes and associated infrastructure.

Appendix 4 – Fully Tracked Version of Draft Policy GP/ST: Skyline and Tall Buildings

Skyline and Tall Buildings

Policy GP/ST: Skyline and tall buildings

1. The strategic scale of growth planned will result in changes to the existing skyline. Development proposals that break or result in a significant change to the existing skyline, or are significantly taller than the surrounding built form ~~(as defined by the local context heights in Appendix H: Skyline and Tall Buildings Guidance),~~ must demonstrate how they will maintain, ~~or~~ enhance, or respect through appropriate design response, the distinctive skyline and character of Cambridge and the surrounding district. ~~Such proposals will only be supported where they demonstrate a positive response to their wider setting and satisfy~~ The following criteria are identified:

a. Location, setting and context – applicants must demonstrate through visual appraisals – LVIA/TVIA, with supporting accurate visual representations, how the proposals fit within or respond to the existing landscape and townscape and demonstrate how the proposal maintains, ~~or~~ enhances or respects through appropriate design response, the character ~~and quality~~ of the skyline. Proposals for tall buildings will be assessed on a site-by-site basis with the expectation that a robust evidence base will be provided to demonstrate the development is an appropriate ~~that they are appropriate to their~~ contextual response;

b. Impact on the historic environment – applicants must ~~demonstrate~~ assess and quantify the potential harm of proposals to the significance of heritage assets ~~or other sensitive receptors (view of, backdrop and setting)~~, assessed on a site-by-site basis. These will include impact on ~~key landmarks~~ and viewpoints ~~(identified in Appendix H)~~ and from main streets, local vantage points (such as bridges) and open spaces as well as, dynamic views from roads and, where applicable, The River Cam corridor~~. For Cambridge, proposals must ensure that the character and appearance of a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints, including the Cambridge Commons~~;

c. Scale and massing – applicants must demonstrate using scaled drawings, sections, accurate visual representations and models, how their proposals would form a high-quality addition to the skyline. This will include assessment of the cumulative impact at both strategic and local levels with other existing or emerging proposals as well as against the baseline at the time the application is being made;

d. Design quality – applicants must demonstrate how their proposals create high quality, well-proportioned buildings expressing elegance, proportionality and verticality that articulate base, middle and top using high quality materials and detailing that architecturally integrates plant, lift overruns and flues to ensure a well-articulated skyline. Where appropriate, proposals should introduce a mix of uses that generate activity and a human scale at street level;

e. Amenity and microclimate – applicants must demonstrate that there is no adverse impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking, overshadowing, overheating, glare and reflectivity. Proposals must demonstrate through appropriate technical testing that acceptable microclimatic conditions will be achieved and that opportunities have been taken to minimise urban heat island effects, including through design responses to wind, thermal comfort and surface overheating, and that there is adequate daylight to habitable rooms and sunlight to external spaces both within the proposals and to neighbouring properties and open spaces; and

f. Suicide prevention – applicants must demonstrate how their proposal incorporates proportionate design measures to reduce access to means of suicide having regard to the height, form and public accessibility of the building. Design will be determined by the structure of the building and its surroundings.

Supporting information

Historically much of Cambridge's development was low to medium rise and effectively remained hidden below the tree line in views, or integrated within the established urban fabric. However, land economics typically require increased densities on urban renewal sites, which means buildings are often proposed at greater heights. Contemporary development, especially on central infill sites but also on larger brownfield sites, are more likely to come forward with heights that rise above their surrounding built form and landscape context, and that may be considered tall.

Preserving and enhancing the distinct image of Cambridge's skyline, specifically of the historic core with its famous buildings and treasured landmarks, will remain paramount. However, the city needs also to provide opportunities for modern new development, that responds to current trends and market demands to support and underpin the success and competitiveness of Cambridge as a growth location.

Parts of the skyline are more sensitive to tall buildings than others. Design principles can help to mitigate impacts and integrate new development with Cambridge's skyline and townscape characteristics.

The overarching aim of the policy is to put in place an approach to taller buildings that helps ensure the preservation and enhancement of valued townscape and skyline characteristics of Cambridge, whilst planning for an evolving skyline with high quality buildings that support the city's success and growth.

Cambridge will seek to maintain and enhance the overall character and qualities of its skyline as the city and surrounding district continue to grow. The city and its surroundings are largely free from clusters of modern high-rise buildings, but pressures to intensify sites often result in increased bulk and massing which needs to be carefully

assessed to understand cumulative impacts on the skyline. Proposals for tall buildings within South Cambridgeshire will need to demonstrate how they can successfully fit into the overall rural character of the district. ~~Further advice on skyline and tall buildings, along with the requirements of the assessment criteria for proposals is set out in Appendix H.~~

The skyline of Cambridge is characterised by a cityscape of spires and towers rising above a well-established tree canopy. Subtle variations in topography contribute to a skyline defined by a series of 'incidents', where prominent buildings punctuate an otherwise consistent lower-scale built form. Within the historic core, larger 'set piece' college buildings provide a striking contrast to more modest 'background buildings', which typically range from three to five storeys. In the suburbs, building heights are generally lower, although they tend to increase along key approach routes and at major junctions. The Cambridge Commons introduces a rural character that extends into the heart of the city and provides key opportunities to experience the historic environment, including scale of buildings, from these locations. Notable exceptions to the prevailing scale and massing occur at the city's fringes, including the hospital complex at Addenbrooke's, the hangars at Cambridge Airport, and the Research Parks situated both at the edge of the city and within South Cambridgeshire. These areas accommodate larger-footprint buildings designed to meet contemporary research and clinical needs.

Development in South Cambridgeshire is typically lower in density and domestic in scale, reflecting the rural and semi-rural character of large parts of the district, with church towers and spires rising above mature tree canopies to create visual connections between settlements. Larger-footprint research and development facilities, along with smaller-scale industrial buildings, often present a contrasting character to their surroundings. The emerging new towns at Northstowe and Waterbeach introduce the potential for buildings of greater height and massing than those found in existing villages.

Given the large number of designated heritage assets within the historic core of Cambridge, including a significant number of highly graded heritage assets of great national importance, the potential impact that a proposal for a tall building may have on the significance of those assets will be a critical factor in the consideration of the proposal. For this reason, it is very unlikely that there would be many instances or scope for introducing new tall buildings in or around the historic core. The impact on the setting of heritage assets should be assessed in accordance with the guidance set out in The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) and Tall Buildings: Historic England Advice Note 4 or any successor documents.

Developers bringing forward proposals for tall buildings should apply the criteria in this policy ~~refer to Appendix H of the plan which sets out the required~~ in setting the approach, methodology, and assessment ~~criteria~~ for considering skyline changes and tall buildings within Greater Cambridge.

When submitting planning proposals for tall buildings, developers should refer to part 3 of the Preventing suicides in public places – A practice resource published by Public Health England which sets out interventions to prevent suicide. ~~It sets out actions that developers can implement to restrict access to the means of suicide such as implementing interventions through measures such as fencing with a minimum height of 2.5 metres in tall buildings, inwardly curving fences to make it difficult to climb out. Design of intervention(s) in tall buildings will be determined by the nature of the structure and its surroundings~~

Appendix 5 – Representations to the Draft CIL Charging Schedule (March 2026)

CAMBRIDGE EAST – CIL REPRESENTATIONS **25.3.26**

These representations are submitted on behalf of Marshall Group Properties (Marshall), owners of Cambridge Airport and adjoining land.

The Airport site extends to 187 ha and spans the South Cambridgeshire and City boundary but is not allocated for development in either the South Cambridgeshire Local Plan or the City Local Plan. Instead, it is safeguarded with policies preventing its development. Those policies are expressed in both plans in the following terms:

"The rest of the Cambridge East site is safeguarded for longer term development beyond 2031. Development on safeguarded land will only occur once the site becomes available and following a review of both this plan and the Cambridge East Area Action Plan." [1]

It is apparent from the Council's Community Infrastructure Levy Supporting Statement that the proposed CIL is intended to help meet a gap in infrastructure funding relevant to the 2018 local plans, which run up to but not beyond 2031. Those local plans do not assume or plan the development of the Marshall site – in fact the policies specifically prevent its development until those local plans have been reviewed. The local plans do not set out infrastructure or other requirements for the development of the airport site.

Accordingly, Marshall assumes that the proposed Charging Schedule will not apply to the development of its land. That assumption is obviously so important to Marshall, however, that the status of the Charging Schedule in relation to Marshall's land must be made clear on the face of the Schedule itself.

Marshall has confirmed that the land will become surplus to its operational requirements in 2029/30 and will at that point become available for development. The emerging Greater Cambridge Local Plan recognises the strategic importance of the site as a "*major new city district for Cambridge, delivering market and affordable housing and employment space well connected to the city centre and other important locations by high quality public transport*."

The site is the subject of a draft allocation in the emerging Greater Cambridge Local Plan (S/CE Cambridge East) which confirms the status of the site as a strategic site with long term capacity for at least 8,000 homes and substantial mixed use, town centre and employment development. The draft allocation also anticipates that the development of Cambridge East will generate a requirement for a wide range of transport and other infrastructure.

Pre-application discussions have not yet commenced for the development of Cambridge East, pending the selection and appointment by Marshall of a development partner. The draft site allocation in the emerging Greater Cambridge Local Plan (Policy S/CE) indicates that the site's development will need to be supported by a range of infrastructure – but the scale of development and the range of infrastructure has not yet been master-planned or assessed.

For example, the Regulation 18 draft Local Plan sets high expectations for the site's sustainable development, including in relation to transport. In particular, draft Policy S/CE provides that the site's development must:

[1] See for example, Policy 13 of the Cambridge City Local Plan 2018

"Ensure an exemplar approach to movement and transport within and through the site, transforming the wider connectivity of the eastern edge of Cambridge and promoting a low car living approach where 'walking and wheeling' is the first choice for most residents and visitors from the outset."

It is apparent from the draft Policy that a deliberate site-specific solution is required in order to ensure that this and other critical objectives for the site are achieved. The draft site allocation provides:

"To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and Local Planning Authority. This must include:

a. Sustainable transport measures;

b. Indicative costings;

c. Phasing; and

d. Potential delivery via a Section 106 agreement or CIL."

No discussions have yet taken place about how this site-specific funding and delivery mechanism will work but it is clear that it must be tailored to the requirements of the site, rather than a generalised city-wide CIL.

Similarly, draft Policy S/CE requires the site's development to contain internal travel networks which connect Cambridge East:

"…*to wider routes that will enable sustainable journeys to be made between Cambridge East and other key destinations within Cambridge, including:*

i. *Cambridge Station, City Centre and onwards to West Cambridge and wider destinations on radial public transport corridors; and*

ii. *Southern loop to serve Cambridge Biomedical Campus, Cambridge South Station and Cambridge Leisure site*."

To help achieve this, a wider Greater Cambridge Transport Study (GCTS) is being developed to underpin the new Greater Cambridge Local Plan. However, that GCTS is not yet developed, tested or costed by the authorities and no funding mechanism has been drafted to enable its delivery.

These issues will be worked up through the finalisation of the Greater Cambridge Local Plan and the submission of a planning application. There is no reference to them in the documents supporting or justifying the current draft CIL. It would be inappropriate to apply a CIL which is based on delivering the 2018 Local Plans to development and infrastructure which is being planned and costed in the emerging Local Plan and for which the new Greater Cambridge Local Plan will need to devise its own delivery and funding mechanism if it is to be found sound.

As the Government's CIL Guidance provides:

"Charging schedules are not formally part of the relevant plan but ***charging schedules and relevant plans should inform and be generally consistent with each other****. Where practical, there are benefits to undertaking infrastructure planning for the purpose of plan*

making and setting the levy at the same time. A charging authority may use a draft plan if they are proposing a joint examination of their relevant plan and their levy charging schedule." Paragraph: 012 Reference ID: 25-012-20190901"

*"**Information on the charging authority area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken when preparing the relevant plan (the Local Plan** and the London Plan in London) and their CIL charging schedules. This is because the plan identifies the scale and type of infrastructure needed to deliver the area's local development and growth needs (see paragraph 34 of the National Planning Policy Framework)."* Paragraph: 017 Reference ID: 25-017-20190901

Any CIL or other funding mechanism relevant to Cambridge East, therefore, needs to be planned and tested alongside the policies of the Greater Cambridge Local Plan, not the 2018 plans. Marshall and its appointed developer will engage with that process when it commences.

It is likely that the parties will argue at that time that the Cambridge East site should be **nil rated for CIL**. As a strategic site and a cornerstone of the emerging Greater Cambridge plan, the Cambridge East site is very different from other sites that may be allocated in the plan. In particular, the emerging draft allocation Policy S/CE identifies that Cambridge East will have its own unique infrastructure requirements – and that sufficient confidence in the provision of that infrastructure side by side with the development of the site will be necessary.

The timely provision of bespoke infrastructure would be jeopardised if Cambridge East is simply another site contributing to pooled infrastructure funding.

In order to demonstrate and achieve its deliverability, a bespoke outcome will be necessary.

Exclusion from general CIL would not be unusual for strategic sites of the scale of Cambridge East (or often smaller). For strategic sites and infrastructure, the PPG references the need for a charging authority to "*take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land. A realistic understanding of costs is essential to the proper assessment of viability in an area*." (paragraph 021). In relation to strategic sites, it further provides:

"Can authorities set different rates for strategic sites?

"Charging authorities may want to consider how zonal rates can ensure that the levy compliments plan policies for strategic sites. This may include setting specific rates for strategic sites that reflect the land value uplift their development creates. ***Low or zero rates may be appropriate where plan policies require significant contributions towards housing or infrastructure through planning obligations*** *and this is evidenced by an assessment of viability*". Paragraph: 026 Reference ID: 25-026-20190901

The Guidance reflects the fact that the application of a generalised CIL becomes an added complication for a strategic site. The Council will seek to secure the delivery of site-specific infrastructure through planning conditions and obligations. A genderised CIL adds cost without ensuring delivery, compared with the direct link that would be achieved between securing the requirement through planning obligations.

The addition of a generalised CIL also risks undermining delivery by double taxing strategic sites (with CIL and a full s.106 package). Planning obligations are the most effective route to securing infrastructure when it is required alongside the delivery of new homes.

For the purposes of the currently proposed CIL, however, Marshall requests confirmation from the authorities that the proposed Charging Schedule will not apply to the development of Cambridge East.

Absolute clarity on that as an agreed position is requested.

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