

28 January 2026 By email only localplan@greatercambridgeplanning.org	
Greater Cambridge Shared Planning Policy Team	
Dear Sir or Madam	
REPRESENTATIONS TO GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION ON BEHALF OF IMPERIAL WAR MUSEUM	

This submission is made by Turley on behalf of Imperial War Museum (IWM) in response to the Greater Cambridge Regulation 18 Draft Local Plan.

IWM is in broad support of the Plan as a whole. The following policies have been identified as of concern to the IWM in relation to IWM Duxford Museum and Airfield and comments are provided as below:

Policy S/AMC/IWM: Imperial War Museum, Duxford

Object

The Area of Major Change (AMC) policy is broadly supported. IWM welcome the continued recognition of IWM Duxford as a unique museum of international historic importance with a range of complimentary uses operating at the airfield site.

The extension of the designation to include the land as shown in Figure 122 of the draft Local Plan, is welcomed in supporting an ongoing sustainable future for IWM Duxford.

IWM in conjunction with Gonville and Caius College and selected development partner Henry Boot Development are currently progressing a scheme for an advanced aviation and related technologies hub (AvTech 1) for circa 45,000 sq m together with a new conservation and storage building (IWM Lab) for IWM. HBD are leading the planning application process under a Planning Performance Agreement which is currently at pre-application stage.

The supporting text to the draft policy recognises *‘there are opportunities for further development focused on aviation and other uses which are complementary and support the future of the museum site.’*

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This is welcomed and the partnership described above is wholly in line with this. It presents a rare opportunity for IWM to tackle one of the longstanding challenges it faces to provide large object storage and dedicated bespoke conservation and training space as well as supporting the long-term future of the museum and its airfield.

The draft policy requires the submission of a site-wide masterplan.

IWM strongly supports a masterplanning approach and regards this as fundamental to managing a successful future for the airfield site at IWM Duxford. To this end a masterplan for IWM Duxford was prepared in 2016. An extract from the introduction to the masterplan states:

The vision for IWM Duxford will capitalise on the site's existing strengths, address existing issues and enable IWM Duxford to meet its role and remit. This requires forward thinking, understanding priorities and a strong sense of commitment to ensure a high-quality visitor experience at all times and for all audiences. A masterplan is the only sensible means of successfully planning and implementing a coordinated long-term vision.

This masterplan which was prepared in consultation with key stakeholders including the local authority and Historic England continues to guide future development at IWM Duxford. The objectives of the masterplan are as follows:

- *Enabling the planned increase of visitor numbers*
- *Protecting the site's heritage and placing the historic site at the heart of the visitor experience*
- *Creating a unique public offer and visitor experience*
- *Ensuring the long-term viability of the site and airfield*
- *Making efficient use of the grounds and addressing key operational issues*
- *Maximising the site's commercial potential without impacting on the visitor experience*

It is considered this wholly aligns with the draft policy.

The masterplan provides a flexible framework for development and is not a fixed set of proposals thereby recognising that priorities, opportunities and constraints change over time.

It is worth noting IWM Duxford also has a Conservation Management Plan in place which complements the masterplan.

Development of the western part of the AMC will be for a unique aviation led employment hub. It will not be a visitor attraction and tourist facility but a complimentary commercial use.

A masterplan for AVTech 1 and IWM Lab is currently being prepared. This is considered vital by both HBD and IWM to ensure a co-ordinated approach which encompasses the close complimentary relationship between the future uses and activities at AvTech 1 and those at IWM Duxford and gives full consideration to the sensitivities of the historic airfield site. The AvTech 1 masterplan will sit comfortably alongside the IWM masterplan.

The preparation of one site wide masterplan is not considered necessary, nor will it provide benefits over and above two complimentary masterplans. The key is ensuring a masterplanning approach is taken across the AMC.

It is requested that the draft policy be amended to:

2. 'Development of the site will be informed by the preparation and submission of a site wide masterplan that **masterplan led which** will enable.....'

This minor alteration of the wording covers all future development proposals in the AMC and accommodates the existing IWM Duxford masterplan and the AvTech 1 / IWM Lab masterplan currently in preparation.

Policy BG/BG: Biodiversity and geodiversity

Object

This draft policy requires major development to provide 20% net gain on site or if not possible then as off-site credits. This is double the mandatory requirement of 10%. This increase in biodiversity net gain required for all major development is a significant additional cost which can impact viability and can compromise designs.

The Biodiversity and Green Spaces Topic Paper gives some examples of schemes where 20% net gain has been secured. These are a small proportion of the major applications determined by the Councils and it is noted that these applications date back a few years.

Inevitably there will always be sites where such gains can be delivered. The site-specific circumstances can make a considerable difference to the ability to include for the creation of on-site habitats and BNG delivery.

It is noted that the viability challenge has been recognised by central government. The consultation document issued by Dept for Environment, Food & Rural Affairs in May 2025 sought views on whether the current 10% requirement was too onerous particularly for medium sized sites.

The consultation sought to consider whether the threshold for 10% should be lifted. As a result, the exemption will be lifted for sites of less than 0.2ha and the requirements simplified for small and medium sized sites.

This consultation is highlighted as it recognised evident difficulties in delivering 10% net gain let alone 20%.

It is requested that the Councils consider the policy requirement remain at the mandatory threshold of 10%.

Policy I/AD: Aviation Development

The need for the policy is acknowledged to manage potential environmental and amenity impacts of development associated with aviation and related uses. Point 4 of the policy recognises there are different types of flying activities which have different noise impacts and provides examples as below:

4 .In assessing the impact of noise, consideration will be given, where relevant, to the types of flying activities that are proposed at the site (or are likely to be associated with it)e.g. aerobatics, aero-towing, ballooning, flying training (including ab-initio flights), helicopters, historic aircraft, parachuting, and special event days. Applicants will be required to state what types of flying activities are proposed, and on what scale.

The supporting text states:

Certain types of flying activity may result in a different level or type of potential impact from that caused by conventional modern aeroplanes taking part in 'normal' flights. Such disturbance may often (but not always) be more severe.

IWM in partnership with Gonville and Caius College and Henry Boot Development (HBD) is bringing forward proposals, led by HBD for an advanced aviation and related technologies hub at IWM Duxford. This would include for research and development, prototype testing and manufacture for low and zero carbon advanced air mobility technologies and supporting operations. The environmental impacts compared to conventional aircraft will be less. This being the case it should be recognised in the policy and supporting text.

It is suggested this be amended to read as below with additional text in yellow.

The examples set out in point 4 should include: 'advanced air mobility flying'.

With regard to the supporting text

'Certain types of flying activity may result in a different level or type of potential impact from that caused by conventional modern aeroplanes taking part in 'normal' flights. For example, in the case of advanced air mobility flying where environmental impacts will be less.

Conversely some disturbance may often (but not always) be more severe'.

Policy J/VA: Visitor accommodation, attractions and facilities

Object

The policy refers to visitor attractions outside the defined development of Cambridge will be permitted only where they utilise and enhance existing assets, are appropriate for their location and acceptable in terms of need, environmental and traffic impacts.

The text should recognise that IWM Duxford unlike Wimpole Hall or other visitor attractions has a specific designation as an Area of Major Change under policy S/AMC/IWM: Imperial War Museum Duxford. This acknowledges and establishes support in principle for appropriate development at IWM Duxford as set out in the AMC policy.

Policy J/VA refers to small scale additional development for new facilities. The AMC designation for IWM Duxford allows for development of considerably greater scale than this.

It is requested that the text be amended as follows for clarity:

In South Cambridgeshire there are a number of assets which have become major tourist visitor attractions, such as the World War II airfield at Duxford which is now home to the Imperial War Museum, and Wimpole Hall which is owned by the National Trust. Facilities such as these can only be developed where the assets exist.

Imperial War Museum Duxford is treated as a special case as a museum which is a major tourist / visitor attraction, educational, commercial and aviation facility and is designated as an Area of Major Change

under policy S/AMC/IWM which provides scope for further development focused on aviation and other uses which are complementary and support the future of the museum site.

For other Tourist facilities and attractions, such as Wimpole Hall, this could include visitor and information centres, toilets, tea rooms, or picnic sites.

The policy is intended to support the districts existing attractions and assets. It is not the intention of the policy to encourage new major tourist attractions.

Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge

Support

The development of Whittlesford Parkway as a travel hub together with employment and housing is wholly supported by IWM. The introduction of a bus turning circle is vital and a fundamental part of making Whittlesford station an effective travel hub to enable any significant mode shift to sustainable travel for IWM visitors and staff, being the nearest rail station.

Policy GP/ST: Skyline and Tall Buildings

Object

It is unfortunate that this policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it simply stated *'developments that cause significant change to the existing skyline and / or are significantly taller....'*

As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary for new development at IWM Duxford – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.

Policy GP/HA: Designation heritage assets

Object

The requirement in point 2 that development proposals must 'preserve or enhance' and comply with the rest of strands a) to g) of this policy is not in line with statutory duty in Sections 16, 66 or 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (which requires 'special attention' to be paid). It is similarly not in accordance with paragraphs 213 to 215 of the NPPF where in some circumstances, public benefits can outweigh harm to heritage significance. As drafted, this is unreasonably prescriptive.

In point 3 (a) who 'formally' assesses this (ie whose opinion determines if a building is considered unsound)? Similarly, how could an applicant ever demonstrate that 'all possible measures' have been explored in point b).

It is not clear if all of strands a), b) and c) must be met or if these are either / or situations.

Climate Change

The following have been produced by Turley Sustainability and ESG on behalf of the IWM with respect to their existing and potential development activities at IWM Duxford. These representations are focused on the Climate Change Theme of the GCLP and the following policies:

CC/SD Sustainable Development and the Climate Emergency
CC/DC Designing for a Changing Climate
CC/NZ Net Zero Carbon new buildings
CC/WE Water Efficiency in new developments
CC/IW Integrated Water Management, sustainable drainage and water quality
CC/CE Supporting a circular economy and sustainable resource use
CC/CS supporting land-based carbon sequestration and carbon sinks

In addition to the draft Policies, Turley have also reviewed the following evidence base documents which have been referenced in our representations where appropriate;

- Climate Change Topic Paper (The Topic Paper); and
- Greater Cambridge Shared Planning – Update to Net Zero policy Cost Analysis Report. 2025 (The Evidence Base)

IWM fully supports the strategic commitment set out in the GCLP to positively address the issue of climate change mitigation and adaptation within the plan period.

IWM consider it appropriate to propose that there are a number of unique factors that apply to our organisation and development activities that places particular challenges to our development activities and meeting the proposed sustainability policies. These are:

We are a registered charity and as such rely on income from donations and visitors which means any proposed development must meet tight viability criteria.

As a world leading historical visitor attraction, we must provide buildings that are suitable for exhibiting our pieces. This means our buildings have unique characteristics which includes the need to ensure they are highly permeable during the day with large open spaces. Whilst energy efficiency and building fabric are important considerations for us to function, we must ensure our large buildings can be accessed on a daily basis by thousands of visitors. This places an obvious conflict with some of the aspirations of the policies.

From a sustainability perspective, we believe that our activities at IWM Duxford provide a huge economic and social value to Greater Cambridge (GC) which should be considered in the context of sustainable development. We would suggest that this warrants particular flexibility for our activities which we would be pleased to discuss in further detail with the Council.

The National Planning Policy Framework (NPPF) Consultation, December 2025

It is acknowledged that the Plan will be examined within the context of the adopted NPPF. Nevertheless, we consider it extremely important to highlight the recently published consultation on the revised

National Planning Policy Framework (NPPF¹). The consultation has proposed a number of changes to policies which includes the ability of local authorities to set local standards for energy efficiency above Building Regulations. Should this consultation become government policy then this will have a material impact on the policies within this Draft Plan. The IWM therefore reserve the right to amend these representations at a later date once the revised NPPF is adopted.

The Greater Cambridge Local Plan draft Policies

Policy CC/SD: Sustainable development and the climate emergency

IWM consider that the requirements for a “*standalone Sustainability Statement*” for all major development, and for Sustainability Statements to accompany minor development applications are reasonable. IWM welcomes the recognition that the Sustainability Statement should be “*proportionate to the scale and nature of the application*”.

With respect to the content of the Sustainability Statement, IWM believe that the list of content described in paragraph 2 will need to be amended to reflect the final approved policies post examination which may include the need to remove the requirement for ‘net zero carbon’ should the proposed NPPF changes be implemented.

Policy CC/DC: Designing for a changing climate

Object

IWM have concerns regarding this draft Policy. While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. As stated above IWM have to design buildings with large open spaces and exits and entrances which present unique challenges to address such as ventilation and overheating. IWM request that the policy be amended to include the following text:

Buildings of a unique nature and type (e.g. visitor attractions) may be provided additional commercial or technical flexibility.

Policy CC/NZ: Net zero carbon new buildings

Object

IWM note that the Government is progressing the Future Buildings Standard (FBS), which is intended to deliver highly energy-efficient, low-carbon buildings through Building Regulations at a national level. The FBS seeks to ensure new buildings produce significantly lower carbon emissions than current standards, supporting the transition to net zero in a consistent and coordinated manner across the country. Delivering these requirements through Building Regulations, rather than through locally specific standards, provides certainty to the development industry, avoids unnecessary variation between authorities, and supports efficient delivery at scale. The Government is proposing to change legislation to prevent local authorities from setting standards above Building Regulations and if this legislation is approved then draft policy CC/ NZ will need to be significantly amended or deleted.

¹ [National Planning Policy Framework: proposed reforms and other changes to the planning system](#). Page 24

IWM note that the space heating (15-20kWh per m²) is extremely challenging (if not impossible) for the specific type of buildings required at IWM Duxford. Furthermore, the request to adopt the UK Net Zero Carbon Buildings Standard Energy Use Intensity targets are equally challenging on the basis that, to our knowledge, no target exists for the type of building required by IWM at IWM Duxford so compliance with this standard is not possible. IWM request that the following text be inserted into draft Policy CC/NZ 4:

It is recognised that certain building types and sectors (e.g. visitor attraction and tourist) may not be able to meet the standards and targets proposed in this policy. The Council will consider flexibility with the application of this policy subject to the receipt of appropriate technical and viability evidence.

IWM are currently considering further development activities to support and sustain the future operations at IWM Duxford (which of course provides a huge economic and social benefit to Greater Cambridge). IWM Lab will provide large hanger to conserve and store historical objects which must have large open space within and large doors to move objects in and out. We do not believe such a building can meet the Net Zero Carbon buildings standards being requested of 'typical development'. IWM do fully support the need to construct lower carbon buildings and would welcome a discussion with the Council to identify how we can support this objective in a commercially and technically appropriate manner.

IWM have concerns with respect to CC/NZ 2&3 which prohibits the use of fossil fuels and gas. The IWM fully support the need for the decarbonisation of heating however given the unique nature of our buildings and the need to store our aircraft and military equipment under certain conditions we believe that this warrants specific flexibility. The policy text does note that certain development (e.g. heavy manufacturing or R&D) could be afforded flexibility, and we request that flexibility is also applied to *visitor and tourist attractions*.

In relation to Part C, the policy states that *"proposals must seek to maximise opportunities to generate on-site renewable energy to enable the development, where possible, to achieve all energy demands through onsite energy generation"*. IWM consider such a policy to be extremely challenging for our buildings from both a commercial and technical perspective. We are required by law to provide extensive lighting from both a safety and visual perspective and as such our energy demands can be significant. We do implement a range of energy efficiency measures where possible such as LED lighting, passive sensors etc however meeting this particular target will present substantial financial challenges to our development. We assume that the phrase *"where possible"* will be applied in decision-making but we would prefer the insertion of text providing flexibility to our building types or the policy wording be amended to:

"Proposals should maximise the deployment of renewable energy where feasible and viable."

Part D of draft Policy CC/NZ introduces the concept of an "Energy offset fund" to enable developers to make payments in lieu of failure to meet the energy and carbon standards. IWM are concerned that the policy does not give any detail with respect to the cost of the fund and therefore do not believe this aspect of the draft Policy is sound and in accordance with Paragraph 59 of the NPPF which requires local plan policies to be accompanied by up-to-date viability assessments.

Policy CC/WE: Water efficiency in new developments

Object

IWM fully support the need to improve water efficiency in new developments given the serious issue within the Greater Cambridge area with respect to water stress. We acknowledge the need to find practical and viable solutions that can go beyond current targets, but any solutions must also be reliable and acceptable to industry and recognise the challenges of specific building types

As discussed earlier, IWM welcomes thousands of visitors per day and therefore requires considerable volumes of water for sanitation, catering and cleaning.

In relation to criterion 2 of the policy, IWM consider that the practical and viability implications of the proposed standards should be carefully considered. In particular, the requirement for non-domestic building to obtain 5 credits for category Wat 01 (BREEAM) is a challenge given the consumption of water. IWM are committed to deploying water efficiency measures in their new development and existing building and flexibility with these targets would be welcome. IWM request that the following text be added to draft Policy CC/WE 2

Buildings in the tourism or similar sectors may warrant flexibility with these water efficiency targets subject to the provision of commercial or viability evidence.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

The Topic Paper presents the changes to the draft Policy since the previous consultation exercise. It would appear that very little has changed with respect to the technical requirements.

IWM fully support the need for integrated water management and strategic thinking on all new development and indeed this has been an absolute priority at IWM Duxford.

IWM repeat concerns expressed previously with respect to the application of paragraph 6 of the policy, which states that, *“To protect and enhance water quality, all development proposals must demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).”* While it is reasonable to ensure that development is appropriately served by water and wastewater infrastructure, the policy as currently drafted risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage.

The provision and timely upgrading of wastewater treatment and conveyancing infrastructure is a statutory responsibility of water companies, who are required to plan for and accommodate growth through the relevant regulatory and investment frameworks.

IWM consider that Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.

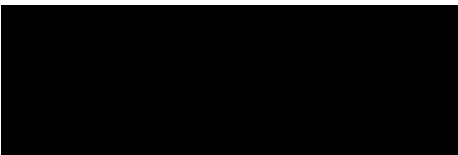
Policy CC/CE: Supporting a circular economy and sustainable resource use

IWM support the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where *“practical and viable”* to meet all requirements in full.

However, IWM have concerns regarding paragraph 5 of the policy, which introduces a requirement for the submission of a Circular Economy (CE) Statement. It is considered that this requirement relates to the information needed to support a planning application rather than to the policy tests against which proposals should be assessed. As such, this requirement would be more appropriately addressed through the Council’s validation requirements, rather than embedded within the policy itself. IWM also believe that the submission of such a statement and/ or information within a Sustainability Statement should be limited at outline planning application stage given that building design information is very limited at that stage. A CE statement should be reserved for detailed design stage only where it will be more meaningful in terms of information.

IWM is keen to continue to be involved in the preparation of the Plan and requests that Greater Cambridge give consideration to the above in preparing the next iteration of the Plan. IWM would welcome the opportunity to discuss the above Greater Cambridge Planning Policy Officers.

Yours faithfully



On behalf of Turley (Cambridge)

