CHEFFINS

F C Butler & Sons Ltd - Representations to the Proposed Submission Greater Cambridge Local Plan (Regulation 19 Consultation)

Date

September 2026 (V2)

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1. Introduction

1.1 Cheffins has been instructed by F C Butler & Sons Ltd to make representations in relation to the Draft Greater Cambridge Local Plan and the allocation of Land at Maarnford Farrm, Hunts Road, Duxford ("**the Site**"). This document has been produced and submitted in relation to the Greater Cambridge Local Plan (Regulation 19) consultation being undertaken by Greater Cambridge Council ("**the Council**").

1.2 The Site has been allocated within the draft Greater Cambridge Local Plan under draft *S/RSC/MF: Land at Maarnford Road, Hunts Road, Duxford*.

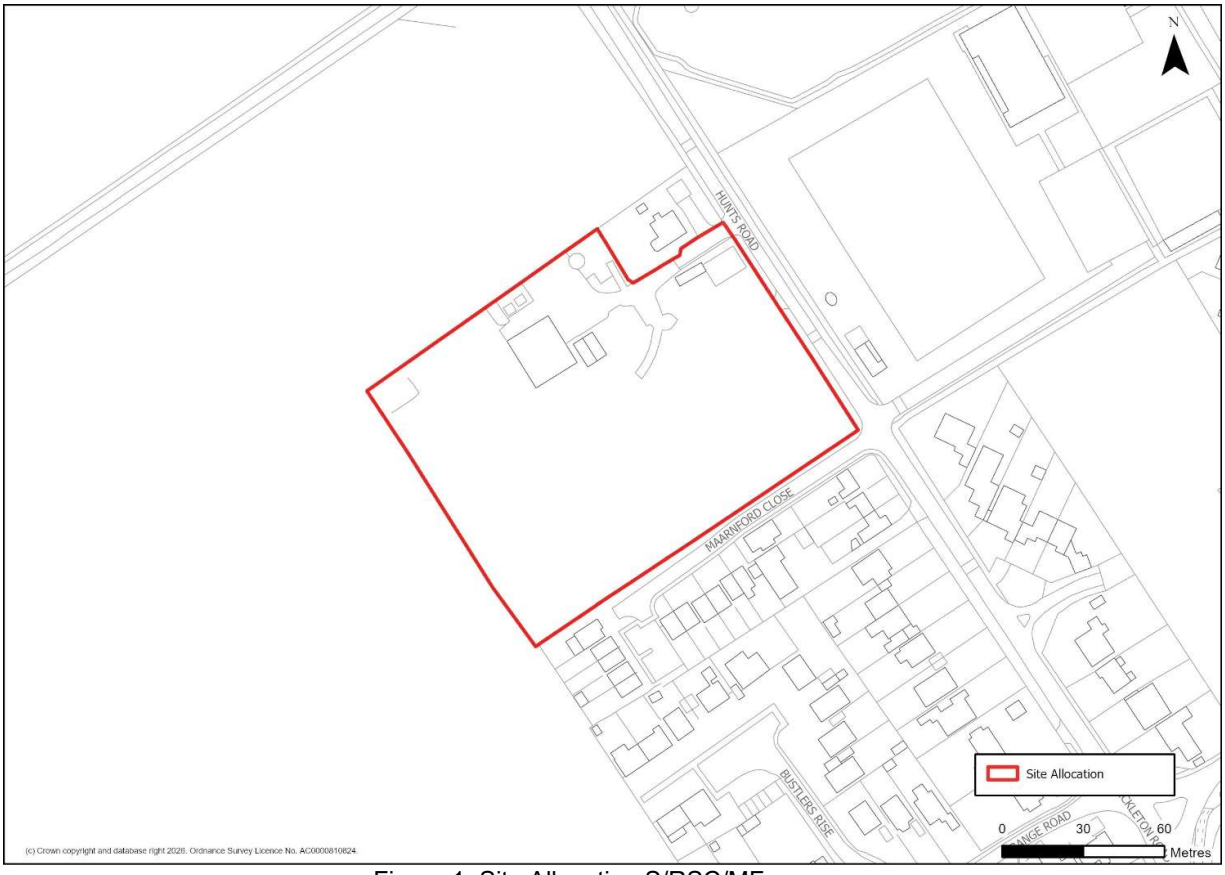


Figure 1: Site Allocation S/RSC/MF

Structure of the Document

1.3 This document comprises the following elements:

- Section 1 Proposed Allocation S/RSC/MF Land at Maarnford Farm, Hunts Road, Duxford – provides commentary on the proposed policy.

- Section 2 Sustainability Assessment - provides observations and views on the Greater Cambridge Local Plan Sustainability Appraisal Report July 2026

2. Section One - Proposed Allocation S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford

2.1 The landowners (F C Butler & Sons Ltd) support the proposed allocation of the Site (Land at Maarnford Farm, Hunts Road, Duxford Policy S/RSC/MF) for residential development and welcomes its continued inclusion within the Proposed Submission Greater Cambridge Local Plan.

2.2 The landowners have actively promoted the site through previous stages of the Local Plan preparation and remain committed to working constructively with Council in bringing the site forward for residential development within the Plan period.

2.3 The Site represents a logical extension to the existing settlement of Duxford and is well related to established services and facilities.

2.4 Proposed Policy S/SH identifies Duxford as a Group Village. For 'windfall' development, Policy S/SH identifies an indicative maximum scheme size of eight dwellings within the defined development extent, and development may exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site.

2.5 Importantly, however, paragraph 2.115 of the supporting text expressly confirms:

2.6 *" The indicative scheme size does not apply to allocations forming part of the overall development strategy of the Local Plan."*

2.7 The supporting text of the draft policy also explains that such allocations have been specifically selected as part of the wider development strategy and may exceed the normal indicative levels applying to windfall development.

2.8 Accordingly, the scale of development identified at Maarnford Farm should not be assessed against the indicative limit applying to ordinary windfall development within Group Villages. Policy S/RSC/MF forms part of the planned development strategy and provides the appropriate policy basis for determining the scale and form of development on this site.

2.9 The landowner therefore supports the approach of allocating the Site for approximately 60 dwellings notwithstanding Duxford's position within the settlement hierarchy.

2.10 It is noted that the location plan of the proposed allocation is marginally different to that submitted in March 2025. This could be a plotting error, however we request that the red line boundary is amended to reflect the red line boundary submitted in March 2025. The Location Plan is submitted with this document.

2.11 The draft allocation represents an opportunity to contribute towards meeting the identified housing needs of Greater Cambridge, including the provision of market and affordable housing.

2.12 Criterion a) of Policy S/RSC/MF requires development to be informed by a Landscape Visual Impact Assessment and Heritage Impact Assessment. It requires building heights, mass and materials to avoid unacceptable adverse effects upon the setting and character of the Duxford and Duxford Airfield Conservation Areas, the Grade I listed Parish Churches of St John and St Peter and surrounding Grade II listed assets.

2.13 The landowners accepts that these matters will be required to inform the detailed design of the development. The landowners support the principle of a design-led approach to development that responds appropriately to the site's landscape, heritage and environmental context. They recognise the importance of ensuring that the detailed design of development is informed by proportionate technical assessments and responds appropriately to the characteristics of the site and its surroundings.

2.14 The landowners support the principle that the design of the development should have due regard to the operational and safeguarding requirements associated with IWM Duxford. However, clarification is requested in relation to the draft wording of criterion b.

2.15 Criterion b presently states:

2.16 *b. Design of the development should not exceed local building heights of two commercial storeys to ensure the development's design responds to the requirements of the IWM Duxford Air Safeguarding Zone.*

2.17 The reference to 'two commerical storeys' is unclear in the context of an allocation specifically proposed for residential development. The policy does not define what constitutes a 'commerical storey' for these purposes nor does the wording itself identify an absolute building height in metres or explain how the terminology is to be translated into an appropriate residential building form.

2.18 This creates potential uncertainty when criterion b) is read alongside criterion a), which separately requires building heights to be informed by the Landscape Visual Impact Assessment and Heritage Impact Assessment.

2.19 It is suggested that the Council clarify the intended meaning and the evidential basis of the phrase 'two commercial storeys' and how it is intended to apply to residential development. If it is the intention to establish a particular maximum building height arising from aviation safeguarding requirements, the requirement should be expressed in clear terms and should reflect the relevant technical safeguarding evidence.

2.20 *Criterion (c) requires:*

retention of existing hedgerows;

provision of a substantial landscape edge incorporating tree buffers to the north and west of the site; and

mitigation of the impacts of the existing telecommunications mast upon residential amenity and outlook.

The landowner acknowledges the need for these matters to inform the detailed layout of the site.

2.21 Policy S/RSC/MF does not prescribe fixed buffer dimensions. That approach is supported and should be retained as such.

2.22 The precise extent, configuration and treatment of the landscape edge and tree buffers should be determined through the detailed design process, informed by the Landscape Visual Impact Assessment and other relevant technical evidence. This allows for an appropriate landscape response to be developed having regard to existing vegetation, the relationship with the surrounding countryside, residential amenity and the efficient use of the allocated site.

2.23 The same approach should apply to mitigation associated with the existing telecommunications mast. The appropriate response should be established through layout, separation, landscaping and other design measures informed by the technical evidence at planning application stage.

2.24 No modification to criterion (c) is therefore requested.

3. Section Two - Sustainability Appraisal

3.1 F C Butler & Sons Ltd agreed with the overall findings of the Sustainability Appraisal in relation to the assessment of the proposed allocation S/RSC/MF. Set out below are comments and observations on the Sustainability Objectives in relation to the proposed allocation.

3.2 These comments draw on the Sustainability Appraisal Report (July 2026), particularly paragraphs 5.619–5.628 and Table 5.62.

3.3 In relation to SA objective 1: Housing, the Sustainability Appraisal (July 2026) identifies that the proposed allocation is expected to have a minor positive effect, recognising that the allocation of the 1.56-hectare site for approximately 60 homes would contribute to housing delivery in the rural area and could support a range of housing tenures and types. The landowners support this finding. The proposed allocation provides a framework for bringing forward residential development through a design-led scheme that responds to the site-specific requirements of Policy S/RSC/MF.

3.4 With regards to SA objective 2: Access to services and facilities and SA objective 4: Health, the Sustainability Appraisal identifies uncertain minor negative and minor negative effects respectively. It notes the site's rural location and considers that residents would not have particularly good access to healthcare or open-space and sports facilities. The Appraisal also acknowledges that the site is not beyond an unacceptable distance from both a primary and a secondary school.

3.5 We would disagree that residents would not have particularly good access to open space and sport facilities. The Site is well located for access to community green spaces such as Brewery Field, Duxford Park and Duxford Tennis Courts, all of which are within walking and cycling distance from the site.

3.6 The site is also well located to other key services and facilities, such as Duxford C of E Primary School, Duxford Community Centre which also benefits from a Café, The Plough Public House and Costcutter Convenience Store. There are also bus stops located in St Peter's Road which is served by regular bus services to Cambridge and Saffron Walden. Whittlesford Parkway Station is also within walking and cycling distance from the Site providing links to Cambridge and London.

3.7 SA objective 5: Biodiversity and geodiversity, the Sustainability Appraisal identifies an uncertain minor positive effect. It notes that the site was assessed as 'Green' in the Housing and Economic Land Availability Assessment in relation to potential biodiversity effects. It also recognises that the retention of existing hedgerows and provision of a substantial landscaped edge, including tree buffers to the north and west, could retain and strengthen green infrastructure and habitat features. The Appraisal appropriately recognises that the eventual effects will depend on the final scale, layout and design of development. The landowners support this position and the incorporation of these measures into the detailed design of future development.

3.8 SA objective 6: Landscape and townscape and SA objective 7: Historic environment, the Sustainability Appraisal identifies uncertain mixed minor positive and minor negative effects. It recognises that the Landscape Visual Impact Assessment, Heritage Impact Assessment and site-specific design and landscaping requirements are likely to help reduce potential adverse effects. The landowners acknowledge that development of a greenfield site will require a sensitive response to the surrounding landscape and designated heritage assets. The detailed layout, scale, massing, materials and landscape treatment will be informed by the assessments required under Policy S/RSC/MF.

3.9 The landowners also wish to draw attention to a difference between the wording of the Sustainability Appraisal and the draft allocation. In discussing SA objective 6, paragraph 5.624 describes the policy as requiring development not to exceed local building heights of "two storeys". Criterion (b) of Policy S/RSC/MF, however, refers to "two commercial storeys" in connection with the IWM Duxford Air Safeguarding Zone. The landowners request clarification of whether these descriptions are intended to express the same requirement, what is meant by "two commercial storeys" in the context of residential development, and the evidence underpinning that requirement.

3.10 In relation to SA objective 8: Efficient use of land, the Sustainability Appraisal identifies a significant negative effect. Paragraph 5.626 states that the allocation comprises greenfield land classified as Grade 1 or 2 agricultural land and that development would result in the loss of high-quality agricultural land. The land is designated as Grade 2 agricultural land. The landowners acknowledge this negative effect but consider the benefits arising in the delivery of the allocated site would far outweigh the minor loss of agricultural land. In particular the development would deliver approximately 60 dwellings contributing towards meeting housing needs, providing a range of housing types and tenures. It would also enable future residents to access nearby employment opportunities, and it is sustainably located to access a range of key services and facilities.

3.11 As outlined in the above paragraphs the Sustainability Appraisal identifies a minor positive effect for housing and a significant positive effect for employment. Taken together, the landowner considers that these benefits justify the allocation notwithstanding the identified loss of Grade 2 agricultural land.

3.12 In relation to SA objective 10: Water and SA objective 11: Adaptation to climate change, the Sustainability Appraisal identifies uncertain minor negative and minor negative effects respectively. It records that the site lies within a Source Protection Zone and that small areas are susceptible to surface-water flooding. The Appraisal also recognises the potential for water-quality mitigation through design and the development-management process, and describes the identified surface-water flood risk as low and likely to be manageable through appropriate mitigation. The landowners acknowledge the need for these matters to be addressed through the drainage strategy and other relevant technical work accompanying a future planning application.

3.13 SA objective 15: Employment, the Sustainability Appraisal identifies a significant positive effect. It records that the site is within 1.8 km of an employment area and considers that approximately 60 homes could provide a relatively large number of new residents with reasonable access to employment opportunities. The landowners welcome the recognition of this potential benefit.

3.14 The landowners (F C Butler & Sons Ltd) look forward to working with Greater Cambridge Joint Council to deliver a high-quality residential development which reflects the character and housing needs of the area.

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