Gonville & Caius College
University of Cambridge

Reg 18 Greater Cambridge Local Plan representation

Land east of M11 at Duxford

Site Reference: 40095
ID: 115180

January 2026

Prepared with

Allies and Morrison - architects and masterplanners

KMC - transport consultants

Graeme Tulley – planning consultant

CONTENTS

Section		Page
1	INTRODUCTION	3
2	GCLP NEEDS AND DEVELOPMENT STRATEGY	6
3	MEETING NEEDS - LAND EAST OF M11 DUXFORD	8
4	FUTURE DUXFORD	13
5	HELAA RESPONSES	16
6	HISTORIC ENVIRONMENT AND LANDSCAPE	17
7	ACCESS AND TRANSPORT	20
8	CONCLUSIONS	29

APPENDIX 1 - Indicative masterplan land east of M11 Duxford

1 INTRODUCTION

1.1 This submission to the Draft Regulation 18 Greater Cambridge Local Plan (GCLP) is made by Gonville & Caius College, University of Cambridge (hereafter "Caius"), in regard to its landholdings at Duxford, east of the M11 (Call for Sites Ref 40095/Site ID 115180).

1.2 The site lies outside of and to the south of the green belt and is separated from it by the A505 and M11.

1.3 As requested at the GCLP consultation portal, a site form has been completed, and this report is uploaded to accompany the site form. Appendix 1 provides an indicative masterplan.

Background

1.4 In 2019 Caius put forward its land east of the M11, south of the A505 and to the north and west of Duxford Village, through the call for site process (Site ref: 40095). The proposals were for an advanced aviation and related technologies hub ("AvTech") comprising circa 110,000 sqm of AvTech employment space together with 800 new homes.

1.5 In 2020 Imperial War Museum (hereafter IWM) and Caius jointly submitted amended proposals to Site Ref 40095. These were for a first phase of AvTech of circa 45,000 sqm (employment space) at IWM Duxford and adjoining Caius land at the western end of IWM Duxford, to also comprise conservation and storage space for IWM own use. In addition a second phase of AvTech was proposed for circa 70,000 sqm and 800 new homes on Caius land east of the M11 surrounding Duxford village.

1.6 The logic of the amended proposals was and remains:

1) to deliver circa 10,000 sqm of much needed new conservation and storage space at IWM Duxford for IWM's own museum related use (now termed the "IWM Lab") as part of its masterplan for IWM Duxford;

2) to deliver circa 45,000 sqm of a first phase of AvTech (AvTech "Phase1") for research and development, prototype testing, manufacturing and hanger space for AvTech occupiers that need direct access to the IWM Duxford airfield. Significantly the AvTech space would help fund the IWM Lab space;

3) a second phase of AvTech (AvTech "Phase 2") of circa 70,000 sqm (east of the M11) to come on stream as AvTech Phase 1 was being built out, with Phase 2 providing expansion and further manufacturing space for occupiers/functions not needing direct or frequent access to the airfield; and

4) provision of 800 new homes, with associated social and community facilities including 40 ha country park on Caius land around Duxford village. The housing would help meet the needs of the new AvTech workforce as well as local needs, creating a revitalised and sustainable future for an expanded Duxford village.

1.7 The proposals were assessed by the HELAA 2021 under the single Site ref 40095 but were not taken forward in the "First Proposals" GCLP.

1.8 Given the need to deliver the IWM Lab and AvTech Phase 1 space as quickly as possible, IWM and Caius obtained pre application advice from South Cambridgeshire District Council on 16 November 2022 (22/50221/PREAPP). This advice was seen as positive by the landowners.

1.9 A further submission was made to the 2025 call for sites by IWM and Caius. This provided further information and requested that the IWM Lab/AvTech Phase 1 site west of the M11 be assessed separately (Site Ref: 115178) from that of the AvTech Phase 2 /residential proposals east of the M11 (Site ID 115180) given their different ownerships, land use mix, delivery timescale and site characteristics.

1.10 A public procurement process was held by IWM and Caius in 2024 for IWM Lab/AvTech 1 . Henry Boot Development (HBD) was selected as development partner in early 2025. HBD is now leading the preparation of a comprehensive and coordinated planning application for the IWM Lab and AvTech Phase 1. Pre application meetings with the Greater Cambridge Shared Planning service are on-going. It is the intention to submit an application in autumn 2026.

1.11 The Draft GCLP now includes Policy S/AMC/IWM: Imperial War Museum, Duxford. As with the adopted Local Plan Policy E/7, Policy S/AMC/IWM Duxford is to be treated as special case and as a… *"major tourist / visitor attraction, educational and commercial facility based on a long established airfield".*

1.12 Draft Policy S/AMC/IWM recognises IWM Duxford as an… "*Area of Major Change (AMC)"* …and notably expands the "red line" policy area to include Caius land immediately to the west to support the delivery of wider enhancements to IWM Duxford, including the opportunity for AvTech Phase1.

1.13 Caius welcomes and supports the inclusion of Policy S/AMC/IWM, and under separate cover has commented on it.

1.14 In terms of land east of the M11 Duxford (i.e. the subject of this submission - Site Ref 40095/Site ID 115180), the HELAA 2025 (GCLP "Sites Dashboard") maintains its overall RED score for "suitability" on historic environment grounds and Caius land east of the M11.

1.15 The site and proposals remain as per the 2025 call for sites (Site ID 115180), namely mixed use development comprising circa 70,000 sqm employment and circa 800 housing units. We note the *"sites dashboard"* does not include these proposed employment floorspace and housing numbers.

This Submission

1.16 This submission relates solely to the Caius land east of the M11 at Duxford. It is supported by:

- Allies and Morrison (architects and masterplanners)
- KMC (transport consultants)
- Graeme Tulley (planning consultant).

1.17 This submission:

- Reviews the GCLP evidence base and development strategy;
- Set out how Caius land east of the M11 will help address GCLP needs;
- Sets out HELAA site assessments to date;
- Addresses the historic environment issues from the HELAA; and
- Comments on transport and highways matters;

1.18 This submission concludes by requesting:

- that the HELAA RED scoring on historic environment is amended to AMBER;
- that Caius Duxford land east of the M11 is accepted in the GCLP as being not only "available" and "achievable" but also **"suitable"** for development;
- is **allocated for mixed use employment and housing** development in the next round of the GCLP; and
- the site is included in the GCLP's **Rural Southern Cluster** (RSC) policy area recognising AvTech is of regional, national and international importance as a business cluster.

2 GCLP NEEDS AND DEVELOPMENT STRATEGY

2.1 The draft GCLP sets out at Policy S/JH the level of needs for jobs and homes in Greater Cambridge that the plan will meet over the plan period of 2024-2045. Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places for the plan period. Specific site allocations then follow.

GCLP objectively assessed needs

2.2 Policy S/JH: New jobs and homes sets out that the GCLP will meet the objectively assessed needs over the period 2024-2045 for 73,300 additional jobs to support the knowledge intensive sectors and also provide a diverse range of local jobs. The evidence base converts this into employment floorspace needs of almost 1,220,000 sqm over the period 2024-2045.

2.3 With regard to housing, a minimum of 48,195 new homes is set for meeting the needs for the total population, including for affordable housing and specialist accommodation needs. The evidence base projects that by deducting needs from existing supply this results in a residual balance of 10,330 homes to find through new allocations between 2024 and 2045.

2.4 Caius does not comment on the evidence base. However, it does note that other forecasts appear to take a very different view of the growth potential for Greater Cambridge.

2.5 For example, the Ministry of Housing Communities and Local Government (MHCLG) commissioned and published Oxford Economics research on 4 November 2025 which sets out three very different scenarios for Greater Cambridge for the 2031 – 2050 period with much higher employment and housing needs.

2.6 Scenarios are of course dependent on data and assumptions used. However, it is possible that as the GCLP progresses and arrives at Examination there maybe representations that the draft GCLP significantly underestimates needs, that additional sites are required to be allocated, and questions raised as to whether the Plan is …"*prepared positively, in a way that is aspirational but deliverable"* (NPPF Para 16).

Development strategy

2.7 Policy S/DS sets out that… *"The need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge green belt".*

a. Within the Cambridge urban area;

b. On the edge of Cambridge;

c. At an expanded Cambourne;

d. At other new settlements; and

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

2.8 Caius does not comment on the Development Strategy order of preference. However, it is apparent that some flexibility will be needed to meet unexpected events, outcomes or dependencies on infrastructure projects which may or may not be delivered.

2.9 Most notably, in August 2025 the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) creating uncertainty as to whether Councils' vision for North East Cambridge can be taken forward. However, we note the Draft GCLP maintains Policy S/NEC to promote development at North East Cambridge with the draft Plan, building in two scenarios whereby North East Cambridge may or may not proceed in the plan period.

2.10 The consequence would appear to be that the 8,350 new homes (5,500 on the WWTP), 320,000 sqm business space, 27,300 sqm of industrial floorspace for mid-tech, light industrial, and creative industries and a new district centre around Cowley Road allocated at Policy S/NEC, are now in doubt with needs to be met elsewhere.

2.11 In this context we note Grange Farm was not progressed in the GCLP First Proposals, and the HELAA 2025 assessment is a RED for "suitability" on landscape grounds.

2.12 Despite this RED suitability score, Grange Farm is now allocated in the Reg 18 for 6000 new homes (Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm) – assuming 2,250 within the Plan period up to 2045. We note the policy requirement (Policy S/GF 13(d)) is to*…" provide a segregated link for the proposed Cambridge South East Transport busway to enable the project to serve the development without being impacted by local congestion"*.

2.13 The Infrastructure Delivery Plan (IDP) sets out the cost of CSET Phase 2 is £161M and the costs of CSET Busway Extension to cross the A11 and A1307 to connect Grange farm is an additional £30M before 2040.

2.14 We appreciate the purpose of plan making is to have a "plan led" system, building in as much certainty as possible as to where development and infrastructure should take place over the plan period. However, as the GCLP has already witnessed

unforeseen events along the way can impact on the development strategy, and some key sites are dependent on major infrastructure being funded and implemented.

3 MEETING NEEDS - LAND EAST OF M11 DUXFORD

3.1 Caius considers its proposals at Duxford east of the M11 would meet employment and housing needs both locally and for Greater Cambridge, deliver a sustainable future for Duxford village, and facilitate more sustainable journeys encouraging more walking and cycling from Whittlesford Parkway through Duxford and onto IWM Duxford.

3.2 In particular, the Duxford proposals east of the M11 would help meet the following needs.

- provide vital AvTech Phase 2 expansion space (circa 70,000 sqm) that investors and occupiers will need as part of a growing aviation and related technologies economic ecosystem around Duxford;
- deliver local housing needs as well as those of new AvTech workers providing a range of housing types (circa 800 units), social and community infrastructure. The masterplan provides for a 40 ha country park and anticipates delivering a new or extended primary school, as well as enhanced community facilities and local commercial services, providing public benefit to residents in addition to new housing;
- encourage more sustainable travel modes encouraging walking and cycling to work. In this regard the masterplan proposals include a new "green link" from Whittlesford Parkway through Duxford and under the slipways and over the M11 to IWM Duxford);
- Caius land could assist in any widening of the A505 that might be proposed.

3.3 We address below how Duxford would help meet needs and fit within the development strategy.

Employment needs

3.4 Caius welcomes the inclusion in the draft Plan of Policy S/AMC/IWM: Imperial War Museum, Duxford.

3.5 With this policy IWM Duxford will continue to be treated as a "special case" as a museum which is a major tourist / visitor attraction, educational, commercial and aviation facility. We also welcome the policy's supporting information that…*"Reflecting the opportunities provided by the airfield, there are opportunities*

for further development focused on aviation and other uses which are complementary and support the future of the museum site".

3.6 It is estimated that AvTech Phase 1 will provide circa up to 45,000 sqm of employment space in use classes E(g)(ii); B2 and Supporting B8 uses. AvTech 2 would provide circa 70,000 sqm.

3.7 The IWM Lab will involve no new employment. Rather it will involve relocation of existing skilled workers from the museum's historic core area. In so doing this will allow the museum to enhance its educational, conservation and recreational functions drawing greater visitation and helping build a sustainable economic future for IWM Duxford. AvTech plays an essential role in helping fund IWM Lab through new commercial income streams.

3.8 AvTech has an important role to play in meeting the overall GCLP employment/floorareas needs by delivering an advanced aviation and related mid-tech hub and new economic cluster benefitting from but also contributing to Cambridge's pivotal role in helping drive the UK economy forward.

3.9 IWM and Caius joint March 2025 call for sites submission set out it was important …*"to recognise the strategic importance of the proposed Duxford AvTech economic cluster, not only for Cambridge but also the UK's global position in innovation – in this case in advanced aviation mobility technologies including low and zero carbon propulsion."*

3.10 Caius welcome that the GCLP has responded to the vision and provides at Policy S/AMC/IWM a policy platform for future growth at IWM Duxford to include… "*further development focused on aviation and other uses"* – a description which we consider would embrace the AvTech Phase 1 proposals.

3.11 However, it also remains the position that AvTech Phase 2 east of the M11 has an essential role to play in optimising the AvTech opportunity and with it the benefits for Greater Cambridge and the UK.

3.12 In this context it is vital to understand that AvTech Phase 1 and Phase 2 proposals are essential linked ingredients of an overall concept. They are linked in that they collectively form a new economic cluster of advanced aviation technology which will draw on the local skills base, supply chains, creating critical mass, drawing new talent, in effect developing a new economic ecosystem, which as well as benefitting from, will contribute greatly to Greater Cambridge and Cambridge University global reputations.

3.13 IWM Duxford AvTech Phase 1 will deliver early years research and development anchored space for AvTech occupiers that need direct and regular airside access. The importance of delivering this AvTech Phase 1 space is reflected in the fact that the forthcoming application (autumn 2026) will be in detail for the IWM Lab, but also for a first tranche of AvTech space to market the opportunity throughout the aviation and related mid-tech sector investor and occupier communities.

3.14 However, as the AvTech economic cluster grows, start-ups scale up and need to move on, and like-minded inward investors are attracted, additional space will be required at AvTech Phase 2 (e.g. for further manufacturing and production) providing the critical mass for a globally significant and sustainable economic cluster. This is where AvTech east of the M11 at Duxford comes in providing the essential expansion space for those occupiers not needing regular and direct airside access.

3.15 In the March 2025 call for sites submission, we set out in detail how AvTech aligns with national planning policy (NPPF-2024), national industrial strategies, the adopted South Cambridgeshire local plan policies at E/7 and E/9, and central government objectives for the Oxford -Cambridge growth corridor.

3.16 Since that time central government has "doubled down" on prioritising growth in the UK, not least through the Planning and Infrastructure Act (2025) and the NPPF - 2025 currently out to consultation.

3.17 Moreover in the case of Greater Cambridge, Government has set out its growth agenda. In October 2025 it announced …."*up to £400 millions of initial government funding to kickstart development in Cambridge with affordable homes, infrastructure and business expansion"*. The Cambridge Growth Company is preparing a masterplan and working with partners to remove barriers to growth in Cambridge, and Government has announced it is planning to start consultation on establishing a new centrally led development corporation to support the growth of Cambridge.

3.18 The Draft Plan's policy platform for AvTech 1 at IWM Duxford is greatly welcomed. However, we consider the logical and consequential approach is to extend this policy platform to Phase 2 AvTech east of the M11.

3.19 Indeed we question why AvTech is not included as part of the GCLP Rural Southern Cluster area where the GCLP*…" ambition is to support and grow this successful and nationally important business cluster by providing more business space where needed….some new housing is allocated in and around existing villages that are well-connected to jobs by public transport, cycling and walking facilities".*

3.20 Caius consider the aviation and related technologies will be equally important for regional and national growth and indeed would extend and diversify the RSC and its global brand.

Housing needs

3.21 AvTech will generate a new workforce and in turn the need for a range of housing types and tenures together with associated social and community facilities.

3.22 Some AvTech workers may relocate from elsewhere in the Cambridge area whilst retaining their existing accommodation e.g. potentially firms relocating from Cambridge airport or spinning out of the university. However, many will be newcomers to the area needing housing.

3.23 The availability of housing is key to attracting, retaining, and training the best people to underpin the success of AvTech.

3.24 It is well known that Cambridge is one of the least affordable and most difficult housing markets to enter. However, as AvTech matures there isn't an identified pipeline of new local housing available to meet this need. The expansion of Heathfield, Thriplow or Whittlesford would require the use of green belt land, and Duxford has run out of infill sites.

3.25 Duxford, along with Babraham, Wellcome Genome Campus, Trumpington Meadows, and Great Kneighton benefits from being a location with expanding investment in employment, and which also has a substantial supply of land in single ownership suitable for housing. This combination facilitates the generation and co-location of local jobs and local housing in sync. Greater Cambridge will need to exploit these sustainable opportunities to achieve its growth potential in the decades to come.

3.26 The draft GCLP has an allocation at Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford with a capacity for approximately 60 homes. Duxford Parish Council (DPC) and Caius are also currently in negotiations for Duxford PC to purchase 1 – 1.5 ha of Caius land at Duxford for local affordable housing.

3.27 The above sites will help meet local needs in Duxford, but they will not meet the needs of the new Avtech workforce.

3.28 However, we note that allocations in the Rural Southern Cluster are providing for housing alongside employment.

3.29 Policy S/WGC: Wellcome Genome Campus, Hinxton sets out that the campus is allocated for mixed use development, including 150,000 square metres (GEA) flexible employment uses, including research and development, office and workspace, and

approximately 1,500 residential dwellings (C3). The 2018 Wellcome Genome planning application/permissions (S/4329/18/OL) considers the majority of the 1500 units at Wellcome Genome are likley to be occupied by its workers.

3.30 Policy S/BRC: Babraham Research campus includes approximately 48,000 square metres gross internal area (GIA) additional research and development floorspace, and approximately 120 additional homes to support the needs of the campus. As with Wellcome it is to be expected this accommodation is predominately for its campus workers.

3.31 Further along the A11 approximately 5 miles from IWM Duxford and close to Granta Park and Babraham, Grange Farm has now been allocated as a new settlement in the draft Plan 18 for 6000 new homes (Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm) - assuming 2,250 within the Plan period up to 2045.

3.32 The GCLP notes the site is …*"located at the heart of the Rural Southern Cluster a globally important cluster of science innovation, Grange Farm will play a vital role in locating high quality new homes close to existing employment areas, connected through a holistic active travel and public transport network"*.

3.33 It would therefore seem Grange Farm's primary role is to meet existing local employment needs in the designated Rural Southern Cluster, as well as contributing to Greater Cambridge overall housing needs after the "loss" of North East Cambridge.

3.34 In any event it would not be the most sustainable solution for AvTech workers to have to travel by car to Grange Farm.

3.35 Given, the draft Plan now recognises IWM Duxford as an area of major change (AMC), the Plan should also recognise and make provision for housing for the new AvTech workers.

3.36 Caius Duxford east of M11 proposals are, as recognised at Policy S/RSC/MF Land at Maarnford Farm, Hunts Road, Duxford, within walking distance of Whittlesford Parkway, where Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge set out proposals to create a multimodal travel hub.

3.37 The Caius proposals are also very well located at the intersection of the M11/A505, and given Caius landownership could help with any proposed A505 corridor improvements. Section 7 addresses the sites accessibility and sustainability further.

3.38 In this context, the Draft GCLP approach to allocating Policy S/RSC/MF Land at Maarnford Farm, Hunts Road, Duxford is useful to explore.

3.39 In plan policy terms the Land at Maarnford Farm is being brought forward as part of the Rural Southern Cluster (Policy S/**RSC/**MF), where …"*some new housing is allocated in and around existing villages that are well-connected to jobs by public transport, cycling and walking facilities".*

3.40 The draft Plan now recognises IWM Duxford as being in an "*area of major change"*, but it raises a question why it is not also included as part of the Rural Southern Cluster, which recognises the associated need for housing, and which could be delivered around Duxford Village to support the sustainable growth of AvTech and the village. In this regard, we note at Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area is both within the AMC and RSC.

3.41 Continued investment in AvTech will also play an important role in diversifying the Rural Southern Cluster in South Cambridgeshire, providing some resilience if investment in biotech and life sciences slows.

3.42 In terms of landscape and conservation matters we recognise there are a number of development and design principles/requirements set out in Policy S/RSC/MF. In this regard it is worth noting that many of these same landscape, visual and heritage principles were embodied in the original Caius masterplan for 800 units around Duxford Village as prepared by Allies and Morrison and submitted originally with the 2019 the call for sites.

3.43 This raises a further question if these policy conditions and requirements are set out for the land at Maarnford Farm, why could they not also be set out as conditions and requirements for the wider Caius residential proposals surrounding Duxford village?

3.44 The Caius proposals would meet similar policy requirements and would of course be subject to further impact assessments in any planning application.

3.45 Caius appreciate that it is proposing 800 rather than the 60 units at Maarnford Farm and this raises questions of openness, landscape, visual and heritage and the "doubling of the village". It should, however, be borne in mind the 800 units (and AvTech development) would be phased over a number of years.

3.46 These are important issues which were addressed in the response to the HELAA 2021 and in the response to the call for sites 2025 but are further addressed below.

4 FUTURE DUXFORD

4.1 Despite sustained pressure for growth in South Cambridgeshire and Greater Cambridge, it is estimated that Duxford's population has only risen by 160 people over the last fifteen years. The ONS 2021 census gives Duxford's population at circa 2,200 with nearly 30% of those over 60 years of age.

4.2 Excluding Caius's land, Maarnford Farm represents the last development parcel identified in Duxford for village growth. This has been allocated at Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford with a capacity for approximately 60 homes.

4.3 Maarnford Farm might meet some immediate local needs but will not address the medium to longer terms needs including those of the new AvTech workforce. Therefore a new masterplan led plan is required to facilitate sustainable growth in Duxford.

Sustainable future for Duxford

4.4 Caius's proposals for its land at Duxford east of the M11 provides the opportunity to achieve a number of benefits for the area. The scale and location of its land ownership will allow the development:

1) To contribute meaningfully to the supply of a range of housing types needed for growth in South Cambridgeshire,

2) To provides for a 40 ha country park and a masterplan that anticipates delivering a new or extended primary school, as well as enhanced community facilities and local commercial services, providing public benefit to residents in addition to new housing;

3) To help meet the needs of the new AvTech workforce as it grows, in a sustainable location with expanding employment and close to Whittlesford Parkway station which, as Policy S/RSC/MF recognises, is within walking distance;

4) To encourage more sustainable travel modes facilitating walking and cycling to work. In this regard the Caius masterplan proposals include a "green link" from Whittlesford Parkway through Duxford and under the M11 slipways and then over the M11 to IWM Duxford;

5) Caius land could also assist in any widening of the A505 that might be proposed;

6) To provide vital AvTech Phase 2 expansion space (circa 70,000 sqm) that investors and occupiers will need as part of a growing aviation and related technologies economic ecosystem around Duxford;

7) To be coordinated and phased over time to manage growth responsively and responsibly;

8) To take a holistic and sustainable approach which includes integrated landscapes, social infrastructure and affordable housing as it is delivered;

9) To provide enhanced local public transport services and active travel routes within and around of the village;

10) To adhere to a comprehensive masterplan and bespoke design code to ensure that all new buildings and the public realm are consistent in quality and appropriate in character;

11) To enhance the village's character in its setting. Recent small site developments at the edge of the village have been based around inward-turning cul-de-sacs. When seen from outside the village these present lines of anonymous garden fences which dilute the sense of character, place and setting. New development should be outward turning and visually engaging to "complete" the village when seen from inside and out;

12) To repair dead ends around the edge of the village and join these up with an expanded network of public footpaths to better connect the village with its context. The dead ends at Martin Drive, Bedell Road, Fairhaven Close, The Rustons, Bustler's Rise, Maarnford Close and Blakeland Hill, for example, could become useful local connections which link to footpaths through development on Caius land, and onward into the proposed country park and beyond.

Increasing the size of Duxford village

4.5 The HELAA 2021 assessment comments…"*development proposed would almost double the area of Duxford excluding the chemical works. It would further dilute the character of the village, block views, and markedly reduce the separation between Duxford and Whittlesford Bridge and Heathfield. Development of the site would have a significant adverse effect on the landscape setting of Duxford".*

4.6 The Duxford Conservation Area acknowledges that Duxford has a small, recognisable historic core, and a characterful relationship to the River Cam. To the north, west, and south, the historic core has been engulfed by incremental development on small sites, most of which dates to the 20th and 21st centuries.

4.7 The majority of this development was built as in-fill parcels based on inward-looking cul-de-sacs. In general, the parts of the village which lie outside the Conservation Area lack coherent character and permeability, and do not enhance the Conservation Area when viewed from outside the village.

4.8 The proposals do not abut directly any part of the Conservation Area but have the potential to improve the context of the Conservation Area by considered layout, boundary treatments, materiality, as well as through the framing of new routes and views to heritage assets.

4.9 Despite the strong pressure for growth and new housing in the region, the population of Duxford has remained nearly static over the last two decades. The future of the village's local facilities and amenities, which include a primary school, two pubs, a cafe and a convenience store, will be more sustainable with access to a larger local catchment.

4.10 The Caius proposals anticipate delivering a new or extended primary school, as well as enhanced community facilities and local commercial services, providing public benefit to residents in addition to new housing.

4.11 The arable land to the west and north of the village is mostly inaccessible to the public and provides little biodiversity or amenity to local residents. The provision of a 40ha publicly accessible country park will enhance biodiversity and amenity, and "unlock" new walking and cycle routes to nearby local places and destinations.

4.12 We recognise that the proposal would significantly increase the size of the village but would reference other examples where sustainable residential development has or will create attractive village extensions - Trumpington Meadows, Great Kneighton and Wellcome Genome Campus helping secure Hinxton as a place of historic character, while supporting the local economy and housing needs.

5 HELAA RESPONSES

5.1 The Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) Report 2021 assessed both sites (west and east of the M11) under the same single site reference number (Site Ref 40095), albeit titling this as *"Land east of M11, west of Duxford, Duxford, CB22 4QG*".

5.2 Sites have been assessed using a methodology that incorporates a 'Red, Amber, Green' (RAG) scoring system. The HELAA 2021 found the proposed sites as "Available" and "Achievable" i.e. GREEN but not considered "suitable" having indicated a sole RED assessment in terms of Historic Environment in terms of its potential impact (sites were deemed to be 'unsuitable' if they were assessed as 'Red' against any of the criteria used).

Criteria	Outcome
Suitable	**Red**
Available	**Green**
Achievable	**Green**

5.3 In response to the GCLP First Proposals 2021, IWM and Caius set out additional information for the sites. This requested that a number of the HELAA AMBER assessments were moved to GREEN and that the RED marking for historic environment – which we assume resulted in the overall not "suitable" conclusion) was reassessed and classified AMBER.

5.4 IWM and Caius also commented in response to the GCLP First Proposal 2021 that the HELAA did not take into account the unique nature and public benefits of the AvTech proposals to the Greater Cambridge and the UK economy and that the proposal should be reassessed as a "special case" in the GCLP.

5.5 Published alongside the Draft Plan is the "Sites Dashboard" which includes summaries of the HELAA 2021, HELAA 2023 and HELAA 2025, the latter publishing for the first time the assessment of the 2025 call for sites.

5.6 The HELAA 2025 now assesses the sites west and east separately – albeit both still retaining Site Ref 40095 - but now with different site ID numbers.

5.7 In terms of land east of the M11 (i.e. the subject of this submission - Site ID 115180), HELAA 2025 maintains its overall RED score for "suitability" on historic environment.

6 HISTORIC ENVIRONMENT AND LANDSCAPE

6.1 In this section we address the HELAA assessment which have been scored as RED for historic environment. We maintain the view that based on the Allies & Morrisons indicative masterplan (Appendix 1) the HELAA assessment should be reclassified as AMBER and the site considered **"suitable"** for development.

Views in to and around Duxford

6.2 From the A505. The HELAA final historic environment comments 2023 notes…*" the elevated view from the north (A505) into the conservation areas, through the proposed site, is particularly sensitive".*

6.3 Due to the natural topography, the ground levels of the proposed site lie below the level of the A505, which has been terraced into the slope of the land, creating a steep embankment along its southern edge. The low-lying nature of the site will reduce the visual impact of development along this edge, as ground floor levels will be set below the level of the A505 and the countryside to the north, which continues to slope upward gently to Whittlesford village.

6.4 Further mitigation is proposed through the prescription of significant landscaped gaps within the development adjacent to the A505 to allow views through to the proposed country park and Duxford village beyond. These gaps would align with e.g.

the public footpath from Whittlesford, to preserve long views towards the village edge and the spire of St John's parish church – though at present the tower and most of the spire of St John's church are obscured by existing tree lines.

6.5 There is an opportunity to use the form of new development and landscape features to highlight views to the village, and, potentially, to landmarks within it, and to create more attractive and permeable edges to the settlement in general through careful design coding and village-wide guidance.

6.6 The experience of open countryside to the north and west of Duxford has been eroded over time by the scale of infrastructure associated with the M11 and A505, which carve the land into visually separate segments, and other large-scale development along the A505, including the Cambridge Assessment complex close to Junction 10 of the M11, and the cluster of plant hire and vehicle maintenance facilities near Whittlesford Bridge.

6.7 Other views: Views from within the Duxford Conservation Area, and from outside the village from the east will not be affected by the proposed development. Views from outside the village from the south will only be affected from along Ickleton Road, and impacts would be mitigated by maintaining and augmenting the existing roadside screen of trees and shrubs, similar to the way the existing chemical works is screened from view on the opposite side of Ickleton Road.

6.8 Views from the Duxford Airfield Conservation Area will generally be screened by existing and new vegetation. The openness of views to the east will be preserved by the inclusion of the country park.

6.9 Wider views: Long views from the A505 east of J10 and from the public footpath from Whittlesford village to Duxford village take in Pepperton Hill south of Grange Road and, further west, Therfield Hill. These views would be preserved and enhanced by shaping the form of development to frame vistas and by the low height of development proposed (total height less than 10m above ground level, i.e., 2-2.5 storeys).

Landscape character

6.10 The HELAA 2021 also refers to the proposal reducing the openness to Grade II* IWM Duxford, Whittlesford and Heathfield.

6.11 All of the proposed development will be low-rise and designed to sit comfortably within the local landscape.

6.12 The form of the proposals, location and heights of all buildings can be configured and designed to minimise visual and environmental impacts on the landscape and

townscape and demonstrated through the use of e.g. visually verified views, and adherence to strict design codes and other quality controls.

6.13 CAA safety requirements require that adjacent land on axis with Duxford Airfield's runways and flight paths will remain clear of building development indefinitely, preserving a sense of openness beyond the boundaries of the airfield itself.

6.14 The proposals would preserve clear expanses of open countryside between neighbouring settlements and create more positive and defensible boundaries to the countryside. These would be defined by the Green Belt to the north, IWM flight circuits and M11 to the west, Cam valley flood zones/designated landscape corridor to the east, and HSE consultation zones to the south.

6.15 The permanent country park to the east of the airfield ensures a sense of openness beyond IWM Duxford will remain intact even if active aviation use of the airfield ceases in future.

6.16 The proposed development is no closer to Whittlesford Bridge or the core of IWM Duxford than existing development along the A505, including the Cambridge Assessment complex, and Welch's Transport, Renault and Volvo plant hire and maintenance facilities. These existing developments contain elements that larger in scale and taller than the proposed buildings would be.

6.17 The combination of highway interventions, and incremental residential and industrial development to the north of Duxford village has more recently filled the gap along the A505 between Whittlesford Bridge and Duxford village. The effect of these developments has progressively reduced the perceived separation between Whittlesford Bridge and Duxford to the point that there is little practical distinction.

Design and development principles

6.18 The draft Plan allocates Maarnford Road on Hunts Road Duxford (Policy S/RSC/MF). The policy sets out…

"proposals must demonstrate how they will meet the following requirements:
a. Informed by Landscape Visual Impact Assessment and , buildings must be designed, in regard to building heights, mass and materials, to ensure no unacceptable adverse on the setting and character of the Duxford , the Duxford Airfield Conservation Areas, the Grade I Listed Parish Church of St John, the Grade I Listed Parish Church of St Peter, and the Grade II Listed assets in the surrounding area. The preparation of a Landscape Visual Impact Assessment and will be required;
b. Design of development should not exceed local building heights of 2 storeys to ensure the development's design responds to the requirements of the IWM Duxford

Air Safeguarding Zone; and

c. Retention of the existing hedgerows and the provision of a substantial landscape edge, to include tree buffers to the north and west of the site, and to mitigate the impacts of the existing telecommunications mast on residential amenity and outlook."

6.19 The original Allies & Morrison original masterplan adopted many of the above design and development principles. As such and given our view that the HELAA assessment should be AMBER, we cannot see why similar requirements could not be made for the Caius proposals.

7 ACCESS AND TRANSPORT

The Colocation of Homes and Jobs

7.1 From a transport perspective, it is considered that the Caius land east of the M11 at Duxford is suitable for a proposed development that could deliver up to 110,000 sqm of employment space (i.e. the amount proposed in the original call for sites – now amended to circa 70,000 sqm is now proposed) alongside approximately 800 new homes in Duxford Village.

7.2 This integrated and mixed-use approach provides a strong basis for supporting sustainable travel, allowing residents to have the opportunity to live within walking distance of their workplaces. It is well understood and appreciated that the integration of housing and employment has the potential to reduce overall travel demand, shorten journey distances, and encourage travel by sustainable modes, including walking, cycling, and public transport, rather than reliance on private vehicles. This proposition encapsulates this opportunity.

7.3 This integrated land use approach has been shown to be an effective transport strategy at other permitted schemes, such as the Wellcome Genome Campus (WGC) and at Eddington, where planning permission has been granted for a combination of residential and employment development. While WGC is not yet fully built out, its approval demonstrates that the co-location of homes and jobs is an accepted mechanism for promoting sustainable travel patterns and Eddington demonstrates some of the most sustainable travel behaviours in the country.

Local Employment Provision and Growth

7.4 The site is located within a growing rural employment cluster in South Cambridgeshire, an area experiencing significant job growth. Key employers in the cluster include Wellcome Genome Campus, Granta Park, Duxford IWM, and Babraham Research, among others.

7.5 However, there is currently limited housing to support this expanding workforce, and this has been an acknowledged weakness of the 2018 Local Plan – job growth to the south of the city and housing growth to the north. The site's location means it is well positioned to help redress this imbalance by allowing new homes to meet local needs while helping to offer the option for shorter and more sustainable travel behaviours.

Opportunities for Walking, Cycling and Public Transport Accessibility

7.6 Existing active travel routes and public transport networks already provide some access to nearby employment opportunities and local services, helping to reduce journey distances and travel times for staff and residents. However, the site can play a role in helping to enhance these and also benefit from programmed improvements in the area.

7.7 The site is situated within the proximity of several existing walking, cycling and public transport routes. The Department for Transport's (DfT) Connectivity Tool has been used to assess the accessibility of the site. The tool is designed to improve understanding of the connectivity of places across England by analysing access to key services and transport networks.

7.8 The DfT Connectivity Tool indicates that the site has slightly below average overall accessibility when excluding car travel, with a national score of 40. Accessibility by public transport and cycling is also slightly below average, while walking accessibility is below average. In contrast, accessibility by car is high, with a national score of 70, placing the site well above average for driving connectivity.

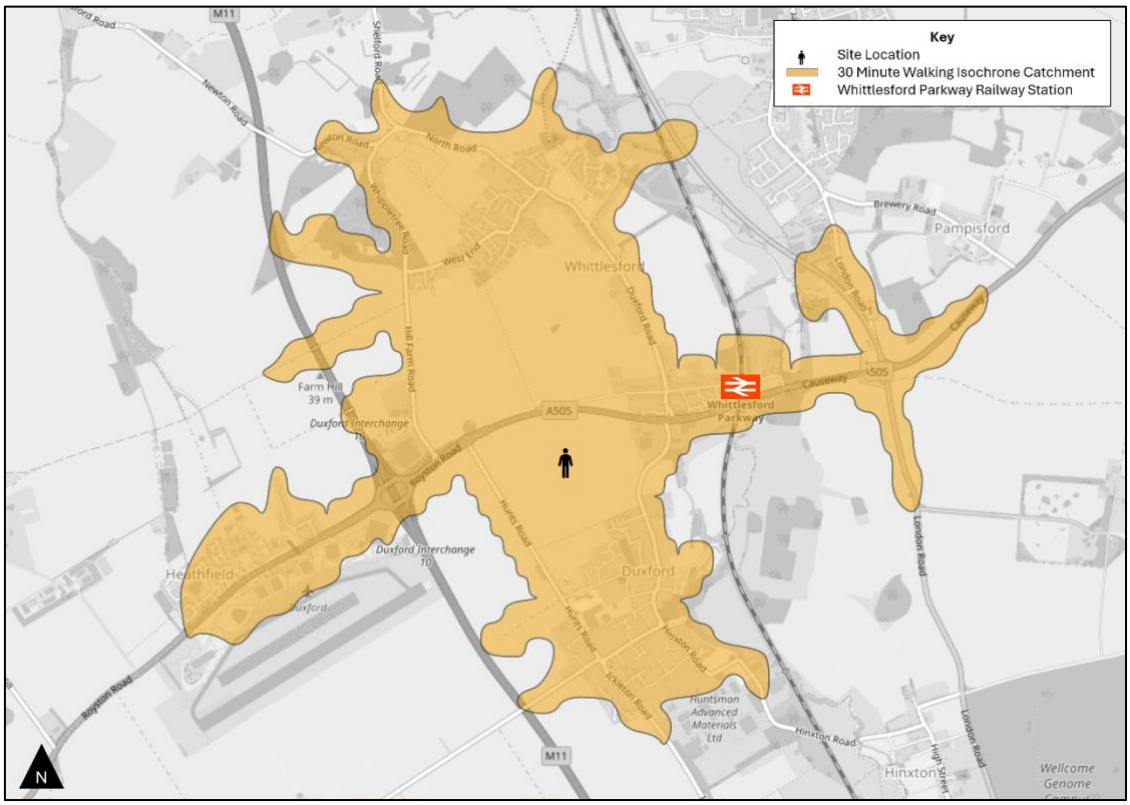
7.9 Overall, the results indicate a location that is more strongly connected by private vehicle than by active or public transport modes. Notwithstanding this, it should be noted that these scores are derived from a national comparator, which includes London and other metropolitan areas with typically higher levels of public transport provision and active travel connectivity. When assessed in the context of a rural, edge-of-settlement location within South Cambridgeshire, the results are consistent with, and in some respects exceed, those typically recorded at similar settlements in the district.

7.10 Taking this positive baseline position, the proposals present an opportunity to further enhance accessibility across all modes through a focus on the delivery of key connections and proportionate contributions towards wider, public sector-led investment and studies. As set out below, these measures are expected to strengthen connectivity and, over time, improve the site's performance against the DfT Connectivity Tool.

Walking and Cycling

7.11 Manual for Streets (MfS) refers to a 10-minute walk (up to around 800m) being a comfortable walking distance for residents on foot, but that a distance up to 2km is also appropriate for replacing short car trips. Figure 1 illustrates the existing 30-minute walking catchment (equivalent to a walking distance of approximate 2km) from the centre of the site.

Figure 1: Existing 30 Minute Walking Isochrone from Site



7.12 Figure 1 illustrates that there are a several potential key destinations within appropriate walking distance of the site. This includes Whittlesford Parkway Railway Station, which is located an approximate 16-minute walk from the site as well as the number of day-to-day facilities and amenities within Whittlesford, Sawston and Duxford.

7.13 In this context we note Policy S/RSC/MF says allocated site at Maarnford Farm is described in the Plan as *"walking distance"* to Whittlesford which would therefore apply to Caius proposals.

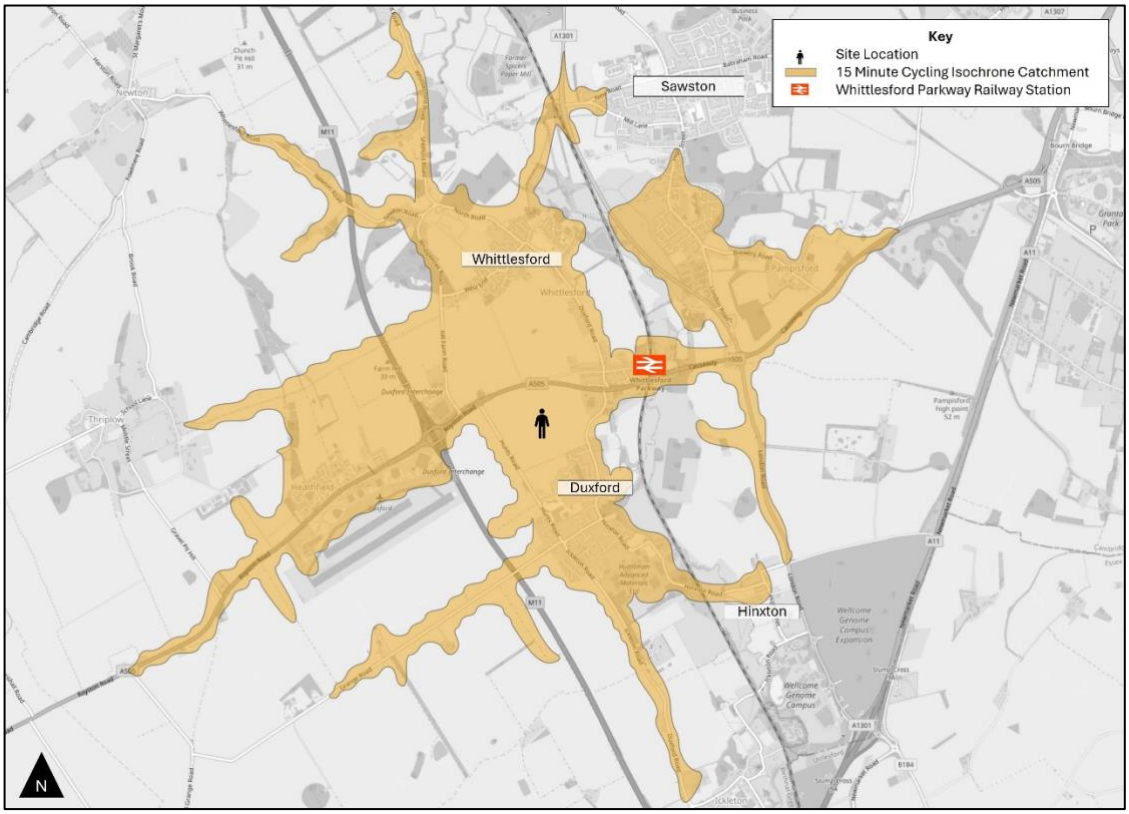
7.14 The isochrone presented in Figure 1 also details that Duxford IWM is accessible within a 30-minute walk of the site. However, this does not account for the barrier effect and potential severance caused by the grade separated junction at the M11.

Therefore, in practical terms walking accessibility to Duxford IWM is currently limited from the site, as well as from Duxford and Whittlesford.

7.15 The proximity of these destinations is a fundamental component of the site's sustainability credentials. Whilst pedestrian routes and supporting infrastructure can be improved or enhanced through the development process, the site's location within reasonable walking and cycling distances of key services and facilities is fixed. This approach is consistent with national policy, as set out in NPPF paragraph 110, which states that the planning system should actively manage patterns of growth, with significant development focused on locations which are, or can be made, sustainable.

7.16 Cycling also has the potential to substitute for short car trips, particularly those under 5km. Figure 2 shows the 15-minute cycling isochrone from the application site, which equates to an approximately 5.0km cycle ride.

Figure 2: Existing 15 Minute Cycling Isochrone from Site



7.17 As shown in Figure 2, several nearby settlements are located within appropriate cycling distance from the site. This includes Whittlesford, Duxford, Hinxton and southern Sawston. Figure 2 shows Whittlesford Parkway Railway Station is accessible from the site within an approximate 4-minute cycle ride, as well as Duxford IWM located within a 5-minute cycle ride. However, as noted above, the grade separated

junction at junction 10 of the M11 is perceived to cause a barrier effect to cycling movement and may be off-putting for some users, both from the site and from nearby settlements to the east of the junction such as at Duxford and Whittlesford.

7.18 Whilst the existing accessibility in terms of proximity is shown to be good through the use of isochrones, there is both ongoing and committed investment already taking place along this corridor which will better allow people to travel safely within the isochrones. This includes secured improvements associated with the Whittlesford Parkway Station masterplan, GCP greenway schemes, CSET as well as transport and infrastructure enhancements delivered through existing Section 106 obligations, including those related to the Wellcome Genome Campus. The Agri-Tech development has secured a robust and credible package of mitigation measures to address the impacts arising from significant employment growth. These measures can be relied upon to manage cumulative impacts along the corridor and support further development in a sustainable manner.

7.19 Any development at the site would seek to complement the existing active travel network.

7.20 Most importantly, the College's Duxford proposals include delivering a major new "Green Link" initially for cycling and walking from Whittlesford Parkway, through the College's Duxford land and the village, and under the M11 slip roads and over the M11 through to IWM Duxford (avoiding any future hotel), to enhance sustainable transport modes and access to AvTech, Duxford and IWM.

7.21 In this way the two sites would have a direct link, separate from the M11/A505, helping to minimise congestion on the A505 corridor and facilitating a clear dedicated sustainable and physical linkage between the two.

7.22 The Allies and Morrison masterplan also illustrates and embraces the existing connection over the M11 (Grange Road) to the south of Junction 10, which would significantly enhance the attractiveness, safety and accessibility of active travel journeys compared with the existing route via the grade-separated junction. A connection of this nature has the potential to transform local journeys for existing and future communities and is also transformational for IWM as a significant trip attractor and their existing fragmented relationship to Whittlesford Parkway.

7.23 Active travel connections between the site and the village of Duxford would also be provided. These would improve active travel accessibility for the existing community, enabling easier and more convenient access to both Duxford IWM and Whittlesford Parkway Station.

Public Transport

7.24 The site is situated within walking distance of Whittlesford Parkway Railway Station, approximately 1.35km to the east, measured from the centre of the site. The NPPF places significant emphasis on locating new development in sustainable locations, including sites that enable residents to access railway stations by walking, cycling or wheeling.

7.25 Whittlesford Parkway Railway Station is situated on the West Anglian Mainline, with all services operated by Abelio Greater Anglia. The station includes several facilities, such as cycle parking, waiting areas and ticket purchasing services. A summary of the services operating from Whittlesford Parkway is shown in Table 1.

Table 1: Whittlesford Parkway Railway Station – Summary of Services (Weekday)

Destination	Weekday Frequency	Journey Time
Cambridge North (via Cambridge)	2 services per hour	c.23 minutes
Norwich	1 service per hour	c.90 minutes
Stansted Airport	1 service per hour	c.23 minutes
London Liverpool Street	2 services per hour	c.78 minutes

Timetable taken from National Rail (January 2026) during weekday between 11:00-12:00 to represent weekday average hour

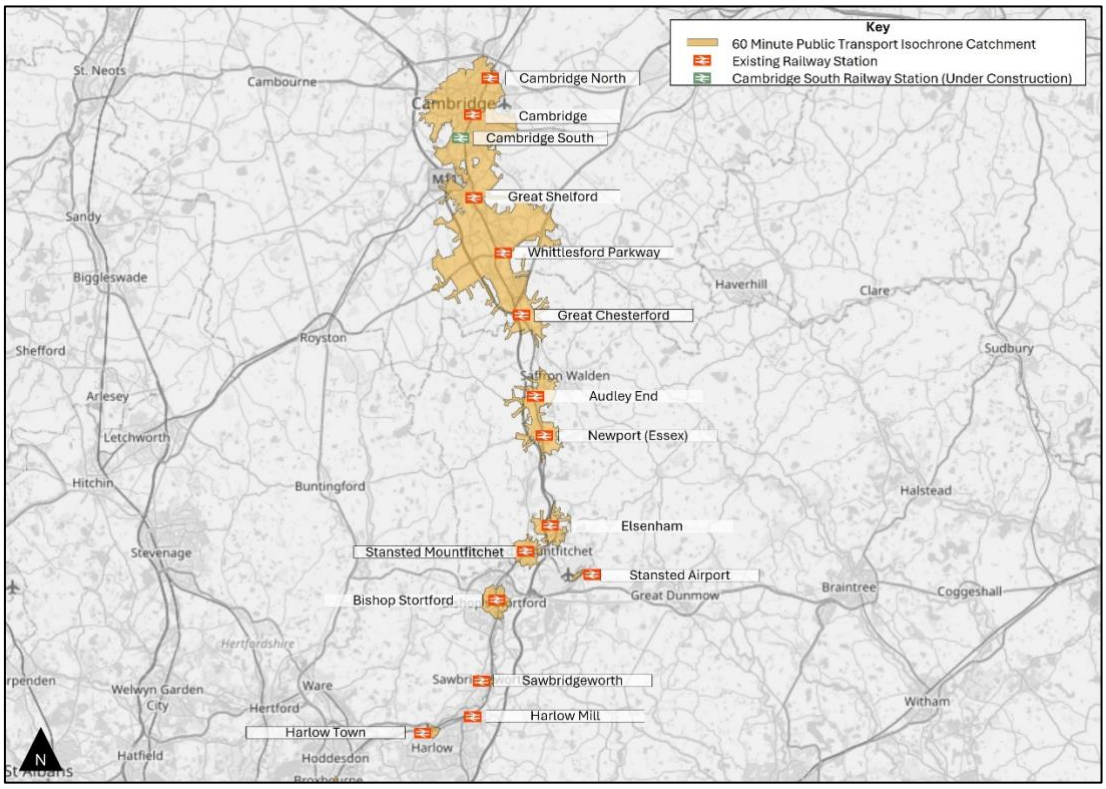
7.26 The suite of destinations illustrated in Table 1 accessible from Whittlesford Parkway Railway Station shows that rail connections can be easily and quickly achieved to areas that are known for international research and healthcare collaboration, large transport interchanges, employment, leisure and residence. This includes Cambridge (North, South and 'Central') which is noted to be one of the top 60 travel to work areas (TTWA), in which the NPFF states growth will be supported in areas with good connectivity too. While the full timetable is yet to be published, preliminary schedules indicate a journey time of approximately six minutes between Whittlesford Parkway and Cambridge South.

7.27 As also shown in Table 1, the approximate weekday hourly frequency of Whittlesford Parkway is six services per hour to four destinations (calling at intermediate stations). The recently updated draft NPPF (2025) identifies railway stations… "*with a service frequency (in the normal weekday timetable) of four trains per hour overall, or two trains per hour in any one direction*", as offering a well-connected level of public transport accessibility. The site's proximity to the station therefore represents a highly sustainable location in public transport terms. The distance from Whittlesford

Parkway to the site falls within the CIHT acceptable walking distances to railway stations.

7.28 Figure 3 illustrates the 60-minute isochrone catchment for rail from Whittlesford Parkway, illustrating the destinations accessible within a 60-minute rail journey and walking distance once reaching the station. The isochrone highlights the stations regional connectivity by providing access to numerous destinations. A written statement in parliament (January 2026) from the DfT underpinned the importance of rail connectivity, recognising "the significant social and economic benefits" of rail accessibility.

Figure 3: Existing 60-Minute Rail Isochrone – Whittlesford Parkway



7.29 Figure 3 demonstrates that a wide range of towns and settlements can be reached within 60 minutes of Whittlesford Parkway. This includes key employment areas such as Cambridge, including Cambridge North and South. Several potential residential locations are also accessible, including Audley End, Bishop's Stortford, Stansted, and Harlow.

7.30 The site also benefits from existing public transport connectivity, with the provision of existing frequent bus services serving Duxford from Moorfield Road. This includes a currently half hour / hourly service between Cambridge and Saffron Walden.

7.31 Whittlesford Parkway Railway Station is subject to the Whittlesford Transport Masterplanning exercise by the GCP. The aim is to improve connectivity to the station and the station facilities, including cycle parking, active travel access, public transport access and the public realm. Caius Land east of the M11, is well positioned to contribute to this important masterplan proposal.

7.32 The site layout also provides potential for a future shuttle service which could link the site with Whittlesford Parkway via Royston Road which is currently just used for overflow car parking for the station, and which would be relocated as part of the masterplan proposals. As part of this connection, the previously identified active travel bridge over the M11 could also potentially be reimagined to accommodate this same shuttle service on the basis that autonomous pods will soon provide for these first and last mile connections. It is considered therefore that, subject to further feasibility work, there is potential for an autonomous pod service to operate from Whittlesford Parkway Station westwards along Royston Road, crossing the A505, passing through the site, and continuing over the M11 towards Duxford IWM, broadly following the corridor where an active travel "green link" is currently illustrated.

Highway Network Impact Considerations

7.33 The site is situated on land south of the A505, a key movement corridor between Royston and the A11 / Granta Park within South Cambridgeshire. The western frontage of the site borders Junction 10 of the M11, part of the strategic road network (SRN) managed by National Highways, with direct access achievable from the A505. The A505 connects Junction 10 of the M11 (west) with the A11 near Granta Park (east). Vehicular access to the site will primarily be achieved from the A505 along the northern site frontage.

7.34 The site's location provides strong connections to the strategic highway network, enabling efficient car access where required and avoiding pressure on local roads and village centres.

7.35 A development of 800 homes and 70,000 sqm of employment floor space at the site would generate additional travel demand. Many trips are expected to be sustainable, either within the site or to nearby employment areas by walking, cycling, wheeling, or public transport. Where vehicle travel by residents is required, travel patterns are likely to differ from existing eastbound flows along the A505. Residential trips are unlikely to mirror current peak-hour movements, with outbound journeys to the M11 or south to the A11 being the most likely.

7.36 The A505 corridor study, known as the 'Royston to Granta Park Study', was commissioned by the CPCA as a strategic transport study assess current and future transport needs along the A505, particularly in relation to the area's science and

innovation parks. Its purpose it was identify a package of interventions that can support growth, improve journey time reliability, highway capacity and promote sustainable travel across this key east–west corridor.

7.37 Although this study has been paused, it remains an important piece of evidence for understanding future highway capacity and strategic transport needs on this route. Recent papers, such as the Transport & Infrastructure Committee Review (January 2025), emphasised that the study demonstrated a strong case for targeted investment in the corridor. It is therefore reasonable to expect that this work / study will not fall away; rather, it is considered likely to be taken forward by the Greater Cambridge Transport Strategy team or the Cambridge Growth Company as part of ongoing strategic planning and infrastructure delivery in the region. Consequently, this may further improve the highway capacity on the surrounding road network.

7.38 The nearby Agri-Tech scheme has secured a robust and credible package of highway mitigation measures to address the impacts associated with significant employment growth. Whilst the related appeal was dismissed on other grounds, the position of the local highway authority was not contested, demonstrating that a material level of additional traffic generation along the corridor was capable of being satisfactorily mitigated. This provides clear evidence that the local highway network has the capacity to accommodate further development, subject to appropriate and proportionate mitigation, without giving rise to unacceptable highway impacts. The land in the College's control has the potential to contribute meaningfully to improvement of the A505 through providing the needed land for carriageway widening.

7.39 In summary, employment growth in the southern cluster will increase travel demand, but the primary consideration is the mode of travel rather than the number of trips alone. The proximity of new homes to employment sites presents opportunities for active travel and public transport use. Promoting sustainable travel will reduce reliance on private vehicles and mitigate pressure on the highway network. A site-specific Travel Plan would also be prepared and submitted in support of any future planning application, in accordance with local and national planning policy requirements.

Access and Transport - Summary

7.40 The site's location provides a strong foundation for the proposed development, sitting within the established southern growth cluster of South Cambridgeshire and benefiting from its strategic position.

7.41 The development would deliver new homes near existing and committed employment opportunities, both within the site and in the wider area. The site

represents an infrastructure-lite opportunity for growth. Its proximity with nearby settlements such as Duxford, Whittlesford and Whittlesford Parkway means that new homes would directly benefit from and reinforce an already well-established network of services, facilities and transport connections. As a result, the development can be delivered without the level of strategic infrastructure investment.

7.42 A series of public-sector-led studies already identify the need for, and feasibility of, targeted investment in this area, creating a clear pathway for future contributions and infrastructure delivery associated with the site.

7.43 The site is also well placed to support both existing and emerging communities, improving local connectivity, including enhanced links between Duxford IWM, Duxford village, and Whittlesford.

7.44 In consideration of the above, the site would be suitable for the described development proposals and should be allocated within the Local Plan.

8 CONCLUSIONS

8.1 Adopted local plan Policy E/7 recognises IWM Duxford as special case as a museum which is a major tourist / visitor attraction, educational and commercial facility. Caius welcomes and supports that draft Policy S/AMC/IWM: Imperial War Museum, Duxford has maintained and indeed strengthened the "special case" policy position.

8.2 Not least, Policy S/AMC/IWM extends the policy "red line" to include Caius land and at Para 3.5.41 says*…." Reflecting the opportunities provided by the airfield, there are opportunities for further development focused on aviation and other uses which are complementary and support the future of the museum site"…* which reflect and embrace the joint landowners' proposals for development of an advanced aviation and related technologies sector (AvTech) at IWM Duxford, which will in turn help fund IWM's own plans for essential new conservation and storage space at IWM Duxford.

8.3 We welcome the GCLP's new policy platform at IWM Duxford. However, we do not consider the draft Plan has followed through on what is a logical and essential extension of the AvTech proposals east of the M11.

8.4 AvTech Phase 1 needs airside access as it moves through R&D, manufacturing, hangar and flight testing of air mobility vehicles, but as Phase 1 is built out there is a need to demonstrate existing and new occupiers and investors that there is nearby scale up and expansion space.

8.5 Caius proposals for a Phase 2 of AvTech east of the M11 and south of the A505 are an essential and linked part of the overall advanced aviation and related technology cluster.

8.6 Equally important are Caius proposal for 800 new homes surrounding Duxford village. This would provide the range of accommodation that AvTech workers will need, delivering more sustainable journeys with easier walk/cycling to work and providing additional social and community benefits for the existing village as well as the new workforce.

Policy support

8.7 Whilst the GCLP has "embraced" AvTech Phase1 (which will in turn help fund the new IWM Lab facilities that the museum needs to ensure its sustainable future at Duxford), we consider the Plan also needs to embrace and provide policy support for the associated housing and AvTech Phase 2 proposals surrounding Duxford village.

8.8 We request this for the following reasons:

1) It will provide vital AvTech Phase 2 expansion space (circa 70,000 sqm) that investors and occupiers will need as part of a growing aviation and related technologies economic ecosystem around Duxford;

2) the residential proposals for circa 800 units are required to help attract, house and retain the new AvTech workforce. This is especially so given the limited availability and high costs of accommodation in and around Duxford as well as Cambridge as a whole;

3) the needs of AvTech will be met in a sustainable way encouraging walking and cycling to work - the masterplan proposals include a "green link" from Whittlesford Parkway through Duxford and under the M11 slipways and then over the M11 to IWM Duxford;

4) the principle that major science and business parks in the Rural Southern Cluster require housing and associated social and community infrastructure is well understood and accepted in the draft Plan, e.g. at Wellcome Genome and Babraham in the Rural Southern Cluster;

5) consideration should therefore be given for AvTech to be included in the Rural Southern Cluster (RSC) policy area recognising Avtech and its related industries will be regionally and nationally important world leaders, would extend and diversify the RSC, and should be supported in the same way as other campuses in the RSC;

6) the new residential proposed in the allocations at Wellcome Genome (with has outline permission) and Babraham is primarily to meet the needs of Wellcome and Babraham. Grange Farm, which is 5 miles away from Duxford, is also allocated to primarily meet needs of existing business parks. In any event it

would not be a sustainable strategy to encourage mainly private car journeys to Grange Farm from Duxford. In short, the new housing allocations in the SRC will do little to assist in meeting AvTech needs;

7) The allocation of 60 units at Maarnford Farm on Hunts Road would meet what might be termed "natural" local needs, not the requirements of the new AvTech workforce. Duxford Parish Council and Caius are in negotiations to acquire some additional Caius land for local affordable housing needs. However, there are no other non-Caius sites to consider in Duxford and Heathfield, Thriplow or Whittlesford are within the green belt;

8) In allocating Maarnford Farm as part of the RSC, the Plan has accepted that it is well located (it immediately adjoins Caius land), is in walking distance from Whittlesford Parkway and that any impacts on the landscape, character, heritage of Duxford village would be dealt with and or mitigated through the planning application process;

9) Caius masterplan prepared by Allies and Morrison for the 2019 call for sites embraces many of the principles that the Maarnford Farm policy requires. A planning application would prepare a detailed masterplan and undertake all required impact assessments and mitigations;

10) It is appreciated that 800 units would be a significant increase of the existing Duxford village. However, as well as being sensitively designed and planned the proposals would bring new social and community infrastructure to Duxford, additional local expenditure and help create a sustainable social and economic future for the village;

11) The proposals - 800 units and circa 70,000 sqm of employment space - would assist the GCLP with evidence to meet its objectively assessed needs, should others through the emerging plan/examination argue that needs have been under estimated or that key sites are not deliverable or would not deliver outputs within the plan period; and

12) The site represents an infrastructure-lite opportunity for growth as proposals are not dependent on major off site infrastructure projects going ahead.

Policy options

8.9 Caius respectively requests the draft Plan re-assesses the Duxford proposals east of the M11 and embraces the following evidence and policy for the emerging GCLP:

1) reclassifying the HELAA historic environment assessment from RED to AMBER;

2) that Caius Duxford land east of the M11 is accepted in the GCLP as being not only "available" and "achievable" but also **"suitable"** for development;

3) allocates within the Plan Caius land east of the M11 Duxford for 800 units and 70,000 sqm of employment science, which will be delivered in phases;

4) includes the site within the GCLP Rural Southern Cluster area – recognising AvTech should be seen as a key part of the RSC which supports business growth in world leading advanced technology sectors and helps diversify the RSC sectoral economic base;

5) If the GCLP does not allocate the site for a specific quantum of development, then designation as a …"*policy area of major change within the RSC (*Policy S/AMC).

8.10 In regard to 5) above, we consider that Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge is a useful precedent.

8.11 Policy S/AMC/WHD *…."supports a masterplan led approach to the comprehensive development of the policy area. This is to create a multimodal travel hub, employment and housing in a highly accessible location*….and…. *Complementary uses including residential and commercial development and appropriate associated infrastructure, services and facilities where they do not prejudice the delivery of the above policy requirements and placemaking outcomes."*

8.12 Caius would be keen to work in partnership with all relevant bodies and local communities in preparing and adopting a masterplan led approach to the comprehensive development of the policy area.

8.13 We consider such a policy lead approach would give the GCLP additional flexibility up to an including Examination in Public to demonstrate the Plan has the capacity to meet all objectively assessed needs.

8.14 It would also offer a partnership approach allowing local communities early stage engagement in the plan making process.

Emerging national planning policy

8.15 Lastly, we recognise the GCLP is being brought forward under existing plan making regulations and the current NPPF. However, we are equally conscious the government is consulting on major new proposals within its draft NPPF 2025.

8.16 These new NPPF proposals appear to embrace the presumption in favour of sustainable development being applied in a much wider range of circumstances.

8.17 In particular NPPF Draft Policy S5 set out a list of situations where the presumption would be to grant permission.

8.18 At draft DM Policy S5 (h) the list includes around train stations… "*Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long-term comprehensive development in the same location"*

8.19 We consider (see section 7 of this submission) Whittlesford would meet NPPF 2025 footnote 26 requirements of being within the top 60 TTWA by GVA with over 4 trains per hour. Draft GCLP Policy S/RSC/MF already recognises that Duxford is within walking distance of Whittlesford Parkway.

8.20 Whilst the NPPF is out to consultation at the time of writing and the GCLP is being prepared under the NPPF 2024, NPPF 2025 reflects Caius thinking on Duxford east of the M11 – a mixed use site needed for AvTech expansion and associated housing, within reasonable walking distance of a mainline station with high connectivity, offering sustainable expansion of the existing village, not prejudicing – in fact delivering comprehensive development, with landscape and conservation matters that can be addressed through the planning application process.

APPENDIX 1- Indicative masterplan land east of M11 Duxford

