Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Alison Stanley	
Organisation (where relevant)	Gonville & Caius College, University of Cambridge	
Job Title (where relevant)	Endowment Property Manager	
Address, including Post Code	Trinity St, Cambridge CB2 1TA	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Land east of M11 at Duxford Site Reference: 40095 ID: 115180
Proposed Submission Policies Map	
Sustainability Appraisal	

Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

With its partners IWM and Henry Boot Developments, Gonville & Caius College (Caius) will shortly submit a hybrid planning applications for AvTech Phase 1. This will include up to 50,000 sqm GEA of employment space for advanced aviation and related technologies (i.e.“AvTech”) - together with circa 11,000 sqm GEA of new conservation and storage space for IWMs own use) at IWM Duxford.

Caius therefore welcomes and supports Reg 19 draft ***Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change***, which explicitly recognises the opportunity to develop additional commercial and aviation technology and related space at IWM Duxford, by including “AvTech 1” within the policy title. This proposed allocation in the Reg 19 Plan confirms the Council’s support for AvTech as a priority employment sector in the Duxford area. We have commented separately on draft Policy S/AMC/IWM.

Since 2019 Caius has responded to all “call for sites” exercises (Site Reference: 40095 ID: 115180) and previous consultations on the GCLP for the Plan to also recognise and include an allocation for AvTech Phase 2 and related employment space (circa 70,000 sqm) and 800 new homes on Caius land east of the M11, south of the A505 and adjacent to Duxford village. The Reg 19 GCLP does not include such an allocation. The site is currently in agricultural use and is not within the green belt.

Caius remains of the view that an allocation should be made for the following reasons:

1. NPPF 2024 (para 86) sets out that Plans should*…"set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy".* In our view AvTech falls within the priority sectors identified in Footnote 43.

2. NPPF 2024 (para 87) sets out*…" Planning policies and decisions should recognise and address the specific locational requirements of different sectors… including the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."* Again we would consider AvTech falls within this description.

3. Reg 19 Plan Policy S/JH: New jobs and homes is to meet objectively assessed needs in Greater Cambridge over the period 2024-2045. Caius proposals would help meet those needs within the plan period on what Caius consider is a suitable, available and deliverable site. It would help build in additional flexibility and headroom to the councils employment/housing need figures which may be needed, particularly given the rapid growth seen in Greater Cambridge, the rise of new typologies such as mid-tech, the reduced potential at North East Cambridge, and where UK government is promoting further growth and productivity gains.

4. The AvTech Phase 2 proposals would provide expansion space (circa 70,000 sqm) that investors and AvTech occupiers will need as part of a growing aviation and related technologies economic ecosystem around Duxford.

5. The principle of AvTech and its economic benefits locally, regionally and nationally has been accepted in the proposed allocation at draft Reg 19 ***Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change.*** This Reg 19 policy explicitly identifies and recognises "AvTech 1", de facto acknowledging there maybe need of additional nearby Avtech and related space (e.g. AvTech 2 providing expansion space for AvTech 1 occupiers and others drawn to the cluster) as the technology hub grows. In turn this would be in keeping with an "area of major change" allocation.

6. The new homes and community infrastructure proposed would help meet local and Greater Cambridge housing and affordability needs, as well as potentially some AvTech workers as the technology cluster matures.

7. Provision of new local homes, social and community infrastructure (including a 40 ha country park) would help provide a revitalised and sustainable future for an expanded Duxford village.

8. Promoting sustainable development by encouraging walking and cycling to work is a key consideration and the AvTech Phase 2 masterplan proposals include a "green link" from close by Whittlesford Parkway through Duxford and would link up with the enhanced bus provision planned for the AvTech 1 proposals from IWM Duxford to Whittlesford Parkway.

9. The Caius proposals are very well located at the intersection of the M11/A505, and the development can be delivered without the need for a major level of strategic infrastructure investment. However, given Caius wider landownership in the area, Caius could help with any proposed A505 corridor improvements.

10. A masterplan approach would ensure there are no adverse impacts on the designated heritage assets and their setting, including listed assets and conservation areas, as well as aviation safety.

In summary we consider by not including provision for AvTech 2 the Reg 19 Plan is unsound in that:

1. It has not been **positively prepared** as it fails to allocate a site which would assist in meeting the objectively assessed needs for employment and housing and is suitable, available and deliverable.
2. Its approach to the site allocations assessment process is **not justified** as it fails to acknowledge that AvTech 2 and related uses would provide expansion space for AvTech 1 occupiers (which the Plan explicitly recognises through its draft Policy S/AMC/IWM) and for others attracted to be part of the advanced aviation and related uses technology cluster.
3. It is **not consistent with national planning policy** which seeks to identify and make provision for growth of priority employment sectors which advanced aviation technology falls into.

Please provide a 100 word summary of your representation.

Caius supports the proposed **Policy S/AMC/IWM AvTech Phase 1** allocation at IWM Duxford. However, it considers the Plan unsound because it fails to allocate land for AvTech Phase 2, comprising approximately 70,000 sqm of expansion employment space and 800 homes east of the M11. Caius argues the site is suitable, available and deliverable, the expansion aligns with national planning policy by supporting a nationally important priority employment sector, provides flexibility to meet future jobs and housing needs, and create opportunities for more sustainable transport, new community infrastructure including 40-hectare country park, while protecting heritage assets on non-green belt land with minimal off site strategic infrastructure investment.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

YES

Reg 18 Greater Cambridge Local Plan representation
Land east of M11 at Duxford
Site Reference: 40095
ID: 115180

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

We would respectfully ask that the AvTech 2 and residential proposal are allocated in the draft submitted to Government and that the allocation is included in the Rural Southern Cluster (RSC) policy area recognising AvTech and its related industries is an important and growing sector significant locally, regionally and nationally. The addition of an aviation related cluster would extend and diversify the RSC and should be supported in the same way as other campuses in the RSC.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	YES

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Caius is a significant landowner thought Greater Cambridge. Its core educational estate is complimented by extensive agricultural, residential, and commercial land and property much of which has development potential. Caius wishes to directly express its views to the Inspector.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	YES
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	YES
Informed of adoption of the Local Plan	YES