TWENTY5

Twenty5 Cambridge
50/60 Station Road
Cambridge
CB1 2JH

Greater Cambridge Shared Planning Policy Team,
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

By email: localplan@greatercambridgeplanning.org

25th September 2026

Dear Sir/ Madam,

GREATER CAMBRIDGE REGULATION 19 LOCAL PLAN CONSULTATION RESPONSE ON BEHALF OF HENRY BOOT DEVELOPMENTS LTD

Introduction

I write on behalf of Henry Boot Developments Limited (HBD) in response to the Regulation 19 (Publication) version of the Greater Cambridge Local Plan (the "Publication Plan"), currently subject to consultation prior to submission for independent examination.

Plan Making Context

It is noted that on 17th August 2026, the Government published the revised 'National Planning Policy Framework, Plan-making and national decision-making policies'. Notwithstanding this, the Greater Cambridge (GC) Local Development Scheme (January 2026) sets out that the Council intends to submit the emerging Local Plan for Examination before the end of 2026. As such the emerging Local Plan is required to be tested against the provisions of the National Planning Policy Framework (NPPF December 2024). Accordingly, these representations have been prepared in the context of the current NPPF.

The Imperial War Museum, Duxford

The Regulation 19 Local Plan continues to recognise the Imperial War Museum (IWM) site at Duxford as a major tourist / visitor attraction, education and commercial facility based on a long established airfield. It is stated within the supporting evidence base, Sites Topic Paper 2025, that the *"museum is of national importance*" and it needs "*…an appropriate policy framework to enable its continued evolution."*

IWM Duxford is described within the South Cambridgeshire Local Plan (2018) "*….as the finest and best-preserved example of a fighter base representative of the period up to 1945 in Britain, with an exceptionally complete group of First World War technical buildings in addition to technical and domestic buildings typical of both inter-war Expansion Periods of the RAF. It also has*

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

important associations with the Battle of Britain and the American fighter support for the Eighth Air Force."

Proposed Development

The IWM is a charitable organisation which operates the museum and looks after its impressive collection. The organisation has identified the need for a new purpose built building, known as 'IWM Large Aircraft Building' (LAB), to provide a fit for purpose area for ongoing conservation and additional storage incorporating necessary modern climate control features. The additional space will enable greater opportunity for the rotation of the collection on display and to curate specialist exhibitions to boost visitor experience.

Pursuant to representations previously submitted on behalf of Gonville & Caius College, University of Cambridge in respect of Sites Reference: 40095 ID: ID 115180 and 115178, it is proposed to bring forward an initial phase of the Duxford Aviation Technology Campus (AvTech) employment alongside the IWM LAB facility. AvTech will comprise purpose built workspace for mid tech uses incorporating research and development, prototype testing, manufacturing, storage and hanger space for AvTech occupiers. The added benefit and rationale for this form of development is the potential for direct access to the IWM Duxford airfield. When complete, it is anticipated this first phase of AvTech will employ c.1,200 people.

The Site represents a rare opportunity for such a development, which would be of national significance, developing technologies in the areas of aviation, defence and travel, enabling the UK to have a dedicated facility in a nationally recognised location that can draw on expertise from nearby businesses, education facilities and talent pools such as the Cambridge University Department of Engineering. IWM has partnered with neighbouring landowner Gonville & Caius College, and our Client Henry Boot Developments Limited, to bring forward AvTech Phase 1 alongside the IWM Lab building in one wider comprehensive form of development that will provide a long term income stream to IWM distinct from the museum. This proposal is to be brought forward on land promoted (HELAA Site Ref: 40095, Site ID 115178).

IWM, HBD and Gonville & Caius have been actively engaging with Planning Officers about the proposal pursuant to a Planning Performance Agreement. Additional engagement has been undertaken with key stakeholders including Cambridgeshire County Council Highways, National Highways, Historic England, and the local community. A hybrid application is currently being prepared and is anticipated to be submitted in October 2026.

As part of the proposal there is significant opportunity to improve active travel and public transport connectivity to IWM. The proposal will seek to encourage walking and cycling to work whilst simultaneously enhancing visitor travel to the IWM, this improvement will also benefit the existing local community. Whittlesford Parkway Railway Station is located approximately 4km to the east of the site. The development will enhance connections to/ from Whittlesford Parkway to the site. The proposal will, where possible seek to incorporate options for enhancements to attractive routes, segregated from more vehicle dominant locations such at the M11 Junction 10. The proposal will also seek to enhance bus connectivity, options will be explored with local providers as well as private shuttle buses for employees, apprentices/trainees and volunteers associated with IWM Lab and AvTech.

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change

Support is given to Figure 87 of the Publication Plan which identifies the extent of the proposed Area of Major Change. This incorporates the adopted Local Plan Policy E/7 area and extension, further to the west, reflecting the land promoted for the IWM LAB building and first phase of AvTech development (HELAA Site Ref: 40095, Site ID 115178).

Broad support is given to Policy S/AMC/IWM in so far as it:

- Identifies that the Imperial War Museum, Duxford Airfield will be "*treated as a special case*".
- Acknowledges the variety of uses at the site including major tourist / visitor attraction, educational, commercial and aviation facility.
- *"Proposals will be considered with regard to the particular needs and opportunities of the site*".
- Seeks proposals and uses "*complementary to the historic character, vitality and sustainability of the site as a branch of the Imperial War Museum*".
- Supports the delivery of uses including AvTech 1 as the policy is entitled.

Specific support is given to the name of Policy S/AMC/IWM which specifically references "AvTech 1". As described above, AvTech relates to the proposed Duxford Aviation Technology Campus which represents a significant opportunity for job creation whilst also benefiting from co-location with IWM Duxford.

Bullet point 2 of Policy S/AMC/IWM requires development of the site to be masterplan-led, with any masterplan expected to align with the wider masterplan for Imperial War Museum (IWM) Duxford. The policy also seeks to ensure that associated infrastructure is planned for and delivered in a comprehensive manner.

It is considered that the bullet point 2 of the policy wording could be made more effective. As drafted it states *"Development of the site will be master-plan led"*. Clarity should be provided to make the policy more effective:

> *"Planning applications for new floorspace for aviation related employment, and other complementary uses, with the exception of museum use, shall be required to submit a masterplan for the proposal demonstrating a masterplan-led approach to the proposed development, having regard to the existing context at IWM Duxford."*

While there is a relationship between the proposed development and the wider IWM Duxford estate, it is important that the policy does not overstate that relationship. IWM has already prepared a masterplan for the museum estate, whereas the land proposed for the IWM Lab building and AvTech workspace (HELAA Site Ref: 40095; Site ID: 115178) comprises a discrete parcel within the allocation that lies outside the ownership of IWM and the area covered by the

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

existing IWM masterplan. The principal connection between the proposed AvTech development and the wider museum complex is that the proposed scheme will provide enhanced museum floorspace for the conservation and storage of IWM's historic collection. In addition, rental returns from AvTech will support the long-term financial sustainability of the museum through the generation of an additional income stream.

A hybrid planning application has been prepared by HBD together with landowners IWM and Gonville & Caius College. The proposal for IWM LAB and AvTech is intended to come forward through a single comprehensive planning application and can be appropriately considered on its own merits. All parties have been working collaboratively upon an application site wide masterplan which has been the subject of Design Review Panel and ongoing feedback from South Cambridgeshire Planning Officers as part of a planning performance agreement.

The development will support the continued operation and long-term sustainability of IWM Duxford, there is no clear justification for requiring the site to be planned as part of a wider estate-wide masterplanning exercise. The policy should therefore recognise the connection between the proposed development and IWM Duxford without creating an unnecessary dependency on, or requirement to align with, the wider museum masterplan.

Furthermore, draft Policy I/ID: Infrastructure and Delivery already provides a framework for securing the planning, funding and delivery of infrastructure through planning obligations, the Community Infrastructure Levy (or any successor mechanism), and other appropriate delivery tools. It is therefore not considered necessary for Policy S/AMC/IWM to duplicate requirements relating to infrastructure provision and delivery.

Policy J/AW: Affordable workspace and creative industries

HBD has significant concerns regarding the soundness of Policy J/AW as it applies to E(g)(iii), B2 and B8 development. As drafted, the policy requires industrial and storage developments over 2,500 sqm to provide a minimum of 10% affordable workspace, at a minimum 20% discount to market rents, together with associated management, monitoring and operational requirements.

The Greater Cambridge Affordable Workspace Study 2026 identifies affordability pressures for smaller and early-stage businesses, however, it does not adequately demonstrate why it is a necessary to provide affordable workspace as part of all qualifying industrial and storage development The policy therefore needs to demonstrate clearer reasoning between i) the identified need ii) the type of development from which the affordable workspace obligation is to be secured, and iii) where it should be located.

This is particularly relevant for schemes such as AvTech, which have been designed to respond to the unique opportunity to be sited adjacent to an airfield. With the planned closure of Cambridge

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

City Airport, Duxford will become the only operational airfield within Cambridgeshire. The proposal offers the opportunity for bespoke units to be designed to meet the needs of occupiers related to the aviation industry, as opposed to open ended wider employment uses. The Council's own evidence recognises the concept of affordable workspace may not be feasible in all situations, particularly where exclusivity is required by occupiers, suggesting payment in lieu.

In addition, there is also a broader issue regarding the relationship between affordable workspace and the supply of employment floorspace. The Greater Cambridge Local Plan identifies a substantial requirement for new employment floorspace and seeks to support continued economic and employment growth. New employment development increases the overall supply and diversity of available premises, enables businesses to relocate into modern accommodation and can release existing premises for other occupiers. The imposition of additional costs on new employment development may, however, have the opposite effect if it reduces land values, affects viability, delays delivery or discourages investment.

The Affordable Workspace Study identifies 10% as a benchmark but acknowledges that provision should reflect viability, site characteristics and development context. However, Policy J/AW applies a blanket 10% requirement across all qualifying E(g)(iii), B2 and B8 development regardless of scheme type, operational characteristics or market conditions. This is simply not justified. Similarly, insufficient justification is provided for requiring a minimum 20% rental discount and provision in perpetuity.

The policy raises significant viability concerns. In addition to discounted rents, it introduces management, monitoring and operational requirements which would add to the burden for schemes, particularly those outside of the centre of Cambridge.

It is noted that South Cambridgeshire District Council and Cambridge City Council are both independently bringing forward a Community Infrastructure Levy (CIL), with the CIL Examination programmed to take place on 12th October 2026.

HBD responded to the CIL Consultation in March 2026 to raise objection to the proposed CIL rates. At the time of writing, Examination has not been concluded and there remains significant unresolved objection from various stakeholders. HBD has highlighted within their duly made representations that:

- The Draft CIL Charging Schedule is not supported by a sufficiently robust viability or infrastructure evidence base.
- The proposed CIL rates fail to reflect differences in employment typologies – specifically mid-tech, the differences across the geography of the authority areas, risks double-charging alongside Section 106, and
- The proposed CIL may undermine the viability and deliverability of sites and wider aspirations of the emerging Local Plan.

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

Whilst the emerging CIL charging schedule has been considered as part of the Aspinall Verdi Regulation 19 'Main Viability Report'. The CIL examination is programmed to take place after the close of this consultation and before submission of the Plan. HBD reserves its position on the interaction between the emerging CIL and the deliverability of the Plan's policy requirements, and will address the matter further once the CIL examination outcome is known.

The local plan viability must be considered alongside the cumulative impact of other Local Plan obligations, including CIL, biodiversity net gain, net zero requirements, transport infrastructure and Section 106 contributions. The Plan should demonstrate that these combined requirements will not undermine the delivery of employment development.

The policy therefore be substantially amended to provide a more targeted, flexible and proportionate approach. In particular, the blanket 10% requirement should be replaced with a scheme-specific approach based on demonstrated local need, operational suitability and viability, including the cumulative cost of other Local Plan and infrastructure requirements.

The policy should provide greater flexibility where the characteristics of operationally, in this case, specialised aviation technology floorspace, make on-site provision of 'open ended' 'affordable employment use' incompatible. Especially with the Publication Plan requires the delivery of a 'Skills and Employment Plan' at draft 'Policy WS/IO: Creating inclusive employment and business opportunities through new developments' which would already provide key opportunities for local businesses.

As currently drafted, Policy J/AW risks constraining the delivery of specialist employment floorspace like AvTech, and has not demonstrated that it will effectively address the affordability issues identified in the evidence base.

Policy BG/BG: Biodiversity and geodiversity

HBD supports the overall objective of securing biodiversity improvements through development and recognises the importance of Biodiversity Net Gain (BNG) as part of the planning system. However, concerns are raised regarding the soundness of the requirement for all major developments to deliver a minimum 20% BNG, which exceeds the statutory national requirement of 10% BNG.

Whilst local planning authorities may seek outcomes that go beyond national minimum requirements, the Plan should clearly demonstrate why a higher local target is necessary, justified and deliverable. The supporting evidence does not adequately explain why the national requirement of 10% BNG is insufficient to achieve the biodiversity objectives of Greater Cambridge.

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

The proposed 20% requirement is likely to have significant implications for development viability and deliverability, particularly when considered alongside the cumulative impact of other Local Plan requirement including affordable housing/workspace, CIL, net zero carbon standards, water efficiency requirements and other planning obligations.

Policy BG/BG should be amended to require development to deliver the statutory minimum 10% BNG, in accordance with the national framework established by the Environment Act 2021, with 20% expressed as an aspiration, until robust local evidence demonstrates that a higher requirement is justified, deliverable and has been fully tested through the Plan's viability evidence.

Policy BG/UGF: Urban Greening Factor

Draft Policy BG/UGF would require all major developments to achieve an Urban Greening Factor score of 0.3 for all commercial development.

The Natural England guidance 'Urban Greening Factor for England User Guide Green Infrastructure Framework Standards for England' (January 2023) states:

> *"UGF is a planning tool that focuses on the greening of urban areas, and it is recommended that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character. Where appropriate its use can also be targeted to development sites and locations where the level of urban greening is a significant planning issue or requirement. This may include the redevelopment of brownfield or post-industrial sites in rural locations or the creation of garden communities that would be expected to provide a significant proportion of green infrastructure across the entire development."*

Whilst the principle of urban greening is supported, draft Policy BG/UGF applies a blanket requirement to all major developments regardless of site context. This risks imposing an unnecessary technical constraint, particularly on greenfield sites where substantial landscaping, green infrastructure, biodiversity enhancements and sustainable drainage measures are likely to be delivered as part of development proposals.

The Local Plan has not demonstrated why a fixed UGF score of 0.3 should apply uniformly to all commercial development regardless of site characteristics, operational requirements or the extent of green infrastructure already proposed.

In order to conform more closely with national policy and Natural England guidance, Policy BG/UGF should be amended so that it is targeted to development sites and locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield sites and sites within the Green Belt. HBD confirms that the Site would deliver green infrastructure across the development offering both opportunities for biodiversity and successful placemaking.

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512

TWENTY5

Twenty5 Cambridge
50/60 Station Road
Cambridge
CB1 2JH

Summary

HBD maintains support for the extent of the designation of 'Policy S/AMC/IWM: Imperial War Museum, Duxford' particularly the additional land identified to the west (HELAA Site Ref: 40095, Site ID 115178).

HBD broadly supports draft Policy S/AMC/IWM, including its recognition of IWM Duxford as a special case and its support for aviation-related and complementary uses. However, HBD considers that the policy should avoid creating unnecessary dependency on wider master, instead the policy should facilitate development in accordance with application specific masterplan.

HBD objects to Policy J/AW: Affordable Workspace and Creative Industries as it applies to E(g)(iii), B2 and B8 development. The evidence base does not adequately justify the application of a blanket requirement for 10% affordable workspace, a minimum 20% rental discount and provision in perpetuity across all qualifying industrial and logistics schemes.

HBD supports the principle of Biodiversity Net Gain but objects to the requirement for a mandatory 20% BNG. The evidence base does not demonstrate why the statutory national requirement of 10% BNG is insufficient, and the Plan has not adequately justified the impact of the higher requirement on development viability and deliverability.

HBD also raises concerns regarding Policy BG/UGF: Urban Greening Factor. Whilst the principle of urban greening is supported, the policy imposes a blanket Urban Greening Factor requirement on all major commercial development regardless of site context, operational requirements or the extent of green infrastructure already being delivered.

Overall, HBD supports the continued growth and evolution of IWM Duxford and the delivery of the proposed IWM Lab and AvTech development but seeks amendments to ensure the Local Plan provides a justified, flexible and deliverable policy framework that supports investment, employment growth and the long-term success of the museum.

Yours sincerely



Lydia Voyias
Associate Director
Twenty5 Planning Ltd

Registered office: Twenty5 Planning Limited | 3 Wellbrook Court, Girton, Cambridge CB3 0NA | Company registration number 16526512