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	Harry Bunbury	Sophia Nitschke
Organisation (where relevant)	Henry Boot Developments Limited	Twenty5 Planning Limited
Job Title (where relevant)		Senior Planner
Address, including Post Code		50/60 Station Road Cambridge CB1 2JH
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	Policy S/AMC/IWM
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	No

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.

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 "c*omplementary 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 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.

Please provide a 100 word summary of your representation.

Support is given to the proposed Area of Major Change and Policy S/AMC/IWM, which appropriately recognises IWM Duxford as a special case and supports aviation-related employment through the proposed AvTech development. The policy correctly acknowledges the site's unique mix of museum, educational, commercial and aviation uses and the role of AvTech in supporting the long-term sustainability of the museum. However, amendments are sought to the masterplan requirement to provide greater flexibility and avoid creating unnecessary dependence on the wider IWM estate masterplan. The proposed IWM LAB and AvTech scheme is being comprehensively planned and should be capable of progressing independently.

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.

Please refer to the full representations submitted in support of this response.

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.

Amend Bullet Point 2 of Policy S/AMC/IWM to require planning applications for aviation-related employment and complementary uses to demonstrate a masterplan-led approach for the application site, having regard to the wider context of IWM Duxford, rather than requiring alignment with the wider IWM estate masterplan. The reference to infrastructure planning and delivery should be removed, as this is already addressed through the Infrastructure and Delivery policy (Policy I/ID).

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.

Participation at the Examination Hearing is necessary as the Local Plan is overall not considered to be legally compliant or sound. Attendance at the hearing sessions will provide an opportunity to explain these concerns in greater detail, respond to matters raised by the Inspector and other parties, and discuss the modifications required to make the Plan sound.

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