

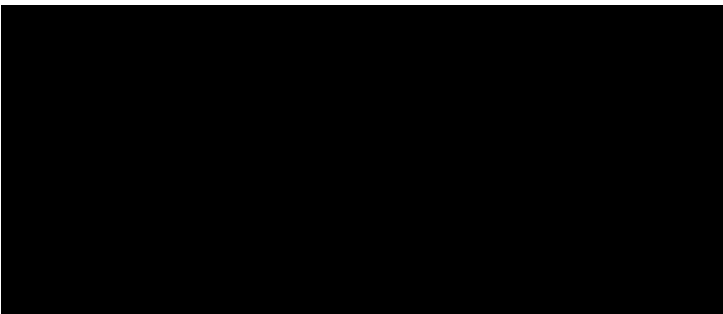
Imperial War Museum and Gonville and Caius College

Greater Cambridge Call for Sites March 2025

Existing Amended Site ref: 40095 Land to east of M11 at Duxford

Proposed New Site Land on west side of Imperial War Museum, Duxford

March 2025



CONTENTS

Section		Page
1	INTRODUCTION	3
2	THE DUXFORD AVTECH CLUSTER	5
3	AVTECH - A SPECIAL CASE	7
4	SITES UPDATE - MATERIAL CHANGES	12
5	AVTECH HELAA ASSESSMENT - HISTORIC ENVIRONMENT	15
6	GCLP ALLOCATION	17
7	CFS 2025 – SITE REFERENCING	18

1 INTRODUCTION

- 1.1 This submission to Greater Cambridge Local Plan (GCLP) Call for Sites (CfS) 2025 has been prepared on behalf of the Imperial War Museum (“IWM”) and Gonville & Caius College (“Caius”) by Graeme Tulley Planning Consultant and Jenny Page Turley Associates.
- 1.2 The representations set out material updates to the existing CfS Site Reference 40095 which comprises lands west of IWM Duxford and east of the M11 at Duxford.
- 1.3 Caius responded to the Call for Sites (CfS) 2019 proposing circa 110,000 sqm of advanced aviation technology specialist employment space (hereafter “AvTech”) and associated residential (800 units) surrounding Duxford Village to the east of the M11 and south of the A505 on the College’s land (Site reference 40095).
- 1.4 Having formed a partnership, IWM and Caius responded to the CfS 2020 with significant updates. The CfS 2020 submission comprised Phase 1 of AvTech space (for occupiers needing direct access to IWM Duxford airfield’s main runway) and a separate and dedicated conservation workshop facility for IWM’s own use (hereafter called the IWM LAB space) at IWM Duxford. Together this Phase 1 comprised circa 40,000 sqm of specialist employment space (AvTech and IWM) at the western end of IWM Duxford.
- 1.5 In the CfS2020, the proposals east of the M11 surrounding Duxford village were reduced to circa 70,000 sqm of “Phase 2” AvTech space with 800 associated new homes.
- 1.6 In response, the Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) Report 2021 assessed both sites under the same single site reference number (Site Ref 40095), albeit titling this as “Land east of M11, west of Duxford, Duxford, CB22 4QG”.
- 1.7 Overall the HELAA 2021 found the proposed sites as “Available” and “Achievable” i.e. GREEN but not considered “suitable” having indicated a single RED assessment in terms of Historic Environment in terms of its potential impact.

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

- 1.8 We do not comment below on all the HELAA assessments made of Site Ref 40095, as the comments set out in IWM and Caius response to the GCLP First Proposals 2021 requesting a number of AMBER assessment are moved to GREEN, remain valid.
- 1.9 However, we do re-address below (Section 5) as the sole RED marking made by the HELAA which was against the historic environment assessment (and we assume thus resulted in the not “suitable” conclusion).
- 1.10 We also commented in response to the GCLP First Proposal 2021, that the HELAA did not address the unique nature and public benefits of the AvTech proposal to the Greater Cambridge and UK economy. We address this further below (Section 2) and consider the Sites should be assessed within the context of the unique benefits which can be delivered by the proposals. This is considered further in Section 3.

2 THE DUXFORD AVTECH CLUSTER

- 2.1 It is 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.
- 2.2 In this context it is vital to understand that Duxford AvTech Phase 1 and AvTech Phase 2 proposals are essential linked ingredients of the overall concept. They are linked in that they collectively form a new economic cluster of advanced aviation technology which would draw on the local skills base, supply chains, creating critical mass, as well as benefitting from Cambridge, Cambridge University and IWM's global reputations. In addition in Phase 2 delivering 800 homes to meet the challenging housing targets for Greater Cambridge.
- 2.3 Duxford AvTech Phase 1 will deliver early years space for AvTech occupiers that need direct and regular airside access. The importance of delivering this Duxford AvTech Phase 1 space as soon as possible to meet commercial demand and secure named tenants has led IWM and Caius to obtain pre application advice (22/50221/PREAPP - 16 November 2022) from the planning authority, which says the proposal may be considered acceptable in principle (Section 4 provides further details).
- 2.4 However, as the AvTech economic cluster grows, start-ups scale up, and like-minded inward investors are attracted , additional space will be required at AvTech Phase 2 (e.g. for product development and supporting industries) providing the critical mass for a globally significant and sustainable economic cluster. This is where AvTech Phase 2 east of the M11 at Duxford comes in providing the essential expansion space for those occupiers not needing regular and direct airside access as well as new residential development.
- 2.5 In summary Duxford Phase 1 AvTech contains specialist employment space:
- specialist advanced aviation technology employment space (AvTech Phase 1) to include research and development, testing, storage, and manufacturing for occupiers that require direct access to the airfield and its main runway; and
 - a separate and dedicated IWM LAB building providing conservation/archive employment space, which is essential to free up space within the public facing parts of IWM Duxford, which will in turn allow IWM to attract and retain additional visitors as part of a business plan to ensure its sustainable future at IWM Duxford, in accordance with adopted Local Plan policy E/7 and emerging policy S/RRP/E/7.

- 2.6 The Duxford Phase 2 proposals east of the M11 are for a mixed use scheme, which includes Phase 2 AvTech employment space (for specialist AvTech occupiers not requiring direct or regular access to the airfield), but also including residential (800 new homes), a new country park (which also allows existing flight patterns to remain in place) and required social and community infrastructure. This would effectively represent a sustainable expansion of Duxford Village, providing new housing for AvTech workers (thus encouraging more self-containment and sustainable walking and cycling patterns) as well as meeting local needs, including affordable housing, and social and community provision providing a sustainable future for Duxford Village.

3 AVTECH - A SPECIAL CASE

3.1 IWM and Caius representations to the GCLP First Proposals noted the HELAA 2021 assessment did not address the unique nature and significant public benefits to the Greater Cambridge and UK economy of the aviation and air mobility proposals.

3.2 We consider much has changed in terms of national planning policy, sub-regional and local objectives and programmes that justifies recognition of Duxford AvTech Phases 1 and 2 as capable of delivering substantive high technology employment floorspace, as well as supporting the ongoing success of IWM Duxford and making provision for 800 homes as sustainable allocations for the emerging GCLP.

National planning policy

3.3 The importance of promoting economic development and particularly the role of Cambridge in this has been emphasised by the new government.

3.4 This growing importance is set out in the NPPF (2024) Para 85 which states:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should **allow each area to build on its strengths**, counter any weaknesses and **address the challenges of the future**. This is **particularly important where Britain can be a global leader in driving innovation**, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential” (our bold italics).*

3.5 Para 86 (a) goes onto say Planning policies should:

*“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, **having regard to the national industrial strategy (footnote 43)** and any **relevant Local Industrial Strategies** and other local policies for economic development and regeneration”*

3.6 In this regard Footnote 43 refers to... *“Invest 2035: The UK’s Modern Industrial Strategy identifies priority sectors for growth and support as: **advanced manufacturing; clean energy industries; creative industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services.**” (our bold italics).*

3.7 The “Invest 2035: The UK’s Modern Industrial Strategy” recognises the importance of aerospace clusters as part of the UK advance manufacturing sector and the role the UK creative industries sector plays in the economy. Paragraph 86c recognises the

need to facilitate modern development. Paragraph 87 recognises the importance of knowledge clusters supported by a supply chain.

- 3.8 The Duxford AvTech proposals would help deliver on the government’s economic objectives for the UK to be a global leader in innovation as set out in the NPPF and footnote 43 which references advanced manufacturing and digital and technology businesses. Duxford Village proposals would in turn offer the opportunity of consolidating the advanced aviation economic and technology cluster at Duxford through additional space as existing companies growth and like-minded inward investment is attracted, with the added attraction of 800 new homes to provide a sustainable new community for AvTech workers and meeting local needs.
- 3.9 NPPF Para 111....”*recognise the importance of **maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the General Aviation Strategy (footnote 47). (Our bold italics)***
- 3.10 With regard to housing paragraph 61 states: ‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed’. Further it is noted at paragraph 69 which states: ‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment’.
- 3.11 Paragraph 77 recognises the importance of residential development as part of larger scale development stating: ‘The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

Local Plan policy

- 3.12 The adopted South Cambridge Local Plan (2018) already recognises “special cases”. Most notably Policy E/7: Imperial War Museum at Duxford, states...” *The Imperial War Museum site at Duxford Airfield will be treated as a **special case** as a museum which is a major tourist / visitor attraction, educational and commercial facility*”. This approach is rolled forward in the emerging Local Plan First proposals.

- 3.13 The special case factor was recognised in the planning authority’s pre application advice (see Section 4 for further details) where it found the principle of development (of the Duxford Phase 1 AvTech and IWM LAB development) may be considered acceptable at IWM Duxford.

Background Evidence informing the preparation of the Local Plan

- 3.14 In January 2023 GCSP published an update of its development strategy for the emerging GCLP. This noted that following further work on employment and homes needs over the plan period (2020-2041), these had increased from 58,500 (as set out in the GCLP “First Proposals”) to 66,600 jobs and from 44,000 to 51,723 homes. The report goes on to note that ...”Reflecting national planning policy as outlined above, in principle we consider that we should plan positively to provide new land for the identified undersupply in particular types of employment, unless evidence identifies an insurmountable problem with achieving that in a sustainable way”.

Central Government Objectives

- 3.15 In a recent speech by Chancellor of the Exchequer Rachel Reeves (29 January 2025) she specifically highlighted Oxford and Cambridge as offering ‘huge potential for our nation’s growth prospects’. She identified the area as a ‘hub for globally renowned science and technology firms’ adding that ‘we are going to further and faster unlock the potential of the Oxford-Cambridge growth corridor’. She stated the intention for with central government, local leaders and business working together to drive investment, innovation and growth in the area.
- 3.16 IWM and Caius support the planning authority’s objective of meeting all needs through sustainable development and consider the Duxford AvTech proposals will help deliver on the employment and homes needs in a meaningful and sustainable way.

AvTech - public interest case

- 3.17 As part of the pre application submission documents (22/50221/PREAPP - 16 November 2022) for Duxford AvTech Phase 1 a public interest case was submitted. This set out the opportunity to attract advanced aviation technology occupiers to Duxford and its airfield to research, develop, test and manufacture low and zero carbon and sustainable aviation and air mobility vehicles. The case also set out current key named potential tenants/occupiers and their requirements to have air side access, and that Duxford AvTech Phase 1 is in the public interest as:
- *a key contribution to the future of UK aviation* - A national innovation cluster for the development of new low and zero carbon aviation technology (Advanced Air Mobility AAM) to support the Government’s 2015 General

Aviation strategy, the 2020 The Ten Point Plan for a Green Industrial Revolution, the Business, Energy & Industrial Strategy, and the UK's commitment to achieve net zero carbon emissions by 2050.

- *protecting the future of IWM Duxford* - The new development will provide new space and resources needed for the future operation of IWM Duxford and protect flying from the historic airfield.
- *major benefits to the future of Cambridgeshire* - Duxford AvTech Phase 1 will bring economic, sustainability and social benefits to the region, to support Local Plan policies.

Clearly since that time updated national policy has placed increased emphasis on the delivery of high technology floorspace in this region.

Duxford airfield - Sequential site assessment

- 3.18 Also part of the pre application submission documents was a sequential site assessment. This concluded (August 2022), given the development proposals at Cambridge airfield, Duxford airfield was... *“clearly the sequentially most preferable location for this proposal”* ...and... *“furthermore, no other location would have the synergy with existing uses or facilitate the future of the IWM Duxford as envisaged in Local Plan Policy E/7 in identifying it as a ‘special case’.*

Conclusion

- 3.19 IWM Duxford is the only suitable, available and deliverable site for a first Phase of AvTech bearing in mind early AvTech occupiers require access to an operational airfield as well as key supporting industries. Adopted Local Plan Policy E/7 already recognises that IWM Duxford is a *“special case as a museum which is a major tourist / visitor attraction, educational and commercial facility”*, and this recognition as a designated policy area should be extended to the adjoining Caius land (the so called “cabbage patch” and overspill car park) in order to provide the space and critical mass needed for Duxford AvTech Phase 1 alongside the IWM LAB facility.
- 3.20 Phase 2 of AvTech around Duxford Village provides additional specialist employment space and associated new homes. It is a logical and needed extension to facilitating the creation of an internationally recognised AvTech economic cluster of like-minded companies focused on sustainable and low and zero carbon advanced aviation and air mobility platforms.
- 3.21 AvTech as a whole is a golden opportunity for Cambridge and the UK to be a global leader and innovator. We ask that the CfS 2025 and subsequent sites assessment recognises there is a special case to allocate both sites west of IWM Duxford and east of the M11 for inclusion in the emerging Greater Cambridge Local Plan as an specialist

(advanced aviation technology) economic growth cluster in the rural area outside the green belt at Duxford.

- 3.22 It is vital to provide market confidence that the local planning process has recognised the importance of both Duxford AvTech Phase 1 and AvTech Phase 2 AvTech and associated residential proposals in its GCLP plan making.

4 SITES UPDATE - MATERIAL CHANGES

- 4.1 We set out the material changes that effect the Duxford AvTech and associated proposals for the CfS 2025 below.

IWM Duxford - Pre application advice

- 4.2 IWM and Caius have been working with potential Duxford AvTech Phase 1 occupiers that need airside space for some while. To meet these pressing needs, IWM and Caius entered pre application discussions with the local planning authority in 2022 providing a full suite of supporting documents including outline design and masterplanning, planning, transport and access, sustainability, public interest case and sequential sites assessment in respect of the IWM Duxford proposals (i.e. Duxford AvTech Phase 1 and IWM LAB building).
- 4.3 Pre application advice was issued by the local authority (22/50221/PREAPP) on 16 November 2022) . This concluded ...*"In summary, the development of an advanced technology aviation innovation cluster on this specific site on the Duxford Imperial War Museum Special Policy Area and in the countryside **may be considered acceptable in principle** subject submission of the further information identified and the recommendations above"*(our bold italics).
- 4.4 On 18 October 2023 Martyn Chase (Caius property advisor) and Graeme Tulley (Caius planning advisor) met on-line with Terry de Sousa and Johanna Davies of the Greater Cambridge Planning Service. The purpose of the meeting was to provide an update to the planning policy officers on the pre application advice (case officer: Karen Pell-Coggins) and to answer questions that the policy officers had with regard to the public interest case, the likely phasing of development, the IWM's own masterplan, and the HELAA assessment in relation to the emerging GCLP. All relevant pre application documents were forwarded, as well as a detailed meeting note setting out answers to the questions posed by officers.
- 4.5 In summary the pre application advice has shown the Duxford AvTech Phase 1 proposals maybe considered acceptable in principle. Notwithstanding, this Phase 1 proposal will be taken through the planning application route before the GCLP is adopted, we consider Duxford AvTech Phase 1 should be an allocation in itself within the GCLP with an extension of the area covered by the existing "special case" of adopted local plan policy (IWM Duxford E/7) to include the Caius land to the west (the so called "cabbage patch") which is needed for AvTech, but which currently lies outside the E/7 designation in the adopted local plan. This will be put forward by IWM and Caius in the next round of public consultation for the draft Local Plan.

Selection of preferred developer for AvTech 1 (IWM Duxford)

- 4.6 Since the pre application advice was issued, IWM and Caius have embarked on a year long public procurement process to select a development partner – required as the IWM land is in public ownership.
- 4.7 IWM and Caius have now selected Henry Boot Development (HBD) as their preferred development partner. This highly experienced national developer of specialist employment space has a long and successful track record of delivering projects in partnership with both the private and public sector with 80% of their pipeline projects of £1.3 bn value, being delivered with their partners. HBD is part of the Henry Boot group which is a stock exchange listed company which was established over 140 years ago, and one of the UK’s leading land, property development, home building and construction businesses.
- 4.8 Following completion of all legal documentation, the developer is required to enter into a PPA with the local planning authority (alongside IWM and Caius) and undertake further pre application discussions in respect of Duxford AvTech Phase 1 proposals.

Achievable and deliverable

- 4.9 The Duxford AvTech Phase 1 public procurement process has involved further commercial, marketing and viability testing as well as further site specific masterplanning studies to ensure proposals are available and deliverable in terms of design, commercial demand and viability.
- 4.10 Working alongside the procurement process, IWM has continued to research and test its own IWM LAB requirements. This includes initial design work on the IWM LAB, how they fit with the overall Duxford AvTech Phase 1 proposals at IWM Duxford, and how IWM LAB will be delivered.
- 4.11 In summary the Duxford AvTech Phase 1 including IWM LAB component are well advanced in terms of masterplanning, initial design, and viability of proposals. The landowners have a development agreement to bring forward their lands and in turn have selected an experienced development partner. Both the AvTech and IWM LAB elements are therefore achievable and deliverable.
- 4.12 The Duxford Village expansion proposals (i.e. AvTech Phase2) and associated 800 residential new homes, open space and community infrastructure is on land wholly owned by Caius. There are no landownership constraints and therefore the land is available and assessed as deliverable in commercial and viability by Caius property consultants (Bidwells).

Duxford AvTech Phase 1 – utilities

4.13 As a further demonstration of deliverability, Caius and IWM have secured all required electrical supplies for the AvTech and IWM LAB at Duxford AvTech Phase 1.

Floorspace - increased to meet requirements

4.14 As set out in the 18 October 2023 meeting note with the GCSP Policy officers it was noted that the proposals at Duxford AvTech Phase 1 have increased due to:

- continuing positive feedback from potential occupiers to take space, the Duxford AvTech Phase 1 component is circa 45,000- 52,000 sqm of specialist advanced technology employment space comprising R&D product development, production, manufacturing and supporting industries; and
- IWM's feasibility and design work on its IWM LAB requirement with a requirement of a maximum to 13,000 sqm.

4.15 In summary in terms of the CfS 2025 the Duxford AvTech Phase 1 (including IWM LAB) would be in the range of 58,000 sqm (min) – 65,000 sqm (max) of specialist employment space as opposed to the 40,000 sqm originally envisaged

4.16 The proposals surrounding Duxford Village remain circa 70,000 sqm of AvTech Phase 2, with associated 800 new homes, new 40 hectare publicly accessible country park (which allows IWM flight patterns to remain in place) and required social and community infrastructure.

4.17 There is no proposed change to the site boundaries of the two site areas.

Phasings

4.18 In respect of the Duxford AvTech 1 (including IWM LAB component), the landowners (IWM and Caius) and preferred development partner expect to commence development within the next five years (0-5 years).

4.19 The delivery of Duxford Village (AvTech Phase 2 with 800 residential units) is working on a different timescale, given it is designed to provide confidence to the market that there is AvTech expansion space as AvTech 1 is built out. It is expected the Duxford Village proposals (employment and housing) would be delivered over a number of years but before the end of the plan period (years 6 plus).

5 AVTECH HELAA ASSESSMENT - HISTORIC ENVIRONMENT

5.1 The HELAA 2021 Historic Environment assessment is referred to here as the original Cfs submission is now for two Sites. The HELAA made one RED flag assessment for Site ref 40095 on the historic environment stating:

- *Within 100m of a Listed Asset*
- *Within a Conservation Area” and*
- *the site wraps around the village and the Conservation Area and development could harm the character of the Conservation Area. The site would also reduce the openness between the village and the Grade II* Duxford Airfield and buildings and have a potentially detrimental impact.”*

5.2 IWM and Caius representations to the First Proposals asked that this HELAA RED flag finding be re-assessed and to draw a clear distinction in terms of the different historic environments of the sites west and east of the M11. We set out below the reasons given in the 2021 representations, which we consider remain valid:

The central part of Duxford Village is a designated conservation area and contains some 31 listed buildings including two Grade 1 buildings and a scheduled ancient monument. Duxford Airfield is also a designated conservation area with listed buildings.

The AvTech Phase 2/Duxford village expansion proposals avoid and respect Coldhams Manor with no buildings proposed within the former Coldhams Manor and moated site to west. Rather the masterplan seeks to “reveal” these assets.

Whilst the development boundary is within 100m of some of the listed buildings within Duxford village, these heritage assets are already surrounded by existing more modern structures and development would be set back so that there was little or no harm to the setting of the listed buildings.

The AvTech 2/Duxford Village expansion proposals do not adjoin the defined conservation area and are at distance from listed buildings and would have little or no impact on its setting. The scale of development proposed is in line with, or lower than, general existing building heights in both conservation areas.

The Duxford AvTech Phase 1 proposal is located on the existing Land Warfare site (within the conservation area) and the “cabbage patch” land to the west. Part of the proposals thus fall within the conservation area and are located to the west of listed buildings. However, the principle of development on the Land Warfare site has already

been established by virtue of planning permission (S/1563/18/FL) which included a full heritage and mitigation strategy.

- 5.3 Further, in relation to Duxford AvTech Phase 1, the preapplication advice referenced above, clearly states in terms of heritage impact that there appears to be scope to integrate new development of the scale proposed without causing excessive harm to its heritage significance.
- 5.4 As such it is requested that when reviewed the HELAA assessment is updated to **AMBER for both Sites**, recognising that all required detailed heritage, archaeological, landscape, visual assessments are to be made at the planning application stages.

6 GCLP ALLOCATION

- 6.1 With regard to Duxford AvTech Phase 1 it will be clear that the proposals are well advanced, positive pre application advice has been received, and an experienced preferred developer is in place.
- 6.2 The development partner, IWM and Caius will seek to agree a PPA with the local planning authority and look to engage in further pre applications discussions as soon as possible to bring forward a comprehensive and coordinated application for Duxford AvTech Phase 1 (including IWM LAB). In short Duxford AvTech Phase 1 proposals will be taken through the planning application route and determined in accordance with the adopted local plan and other material considerations.
- 6.3 However, notwithstanding the proposed planning application, IWM and Caius seek to have the IWM Duxford proposals included as an allocated site in the emerging GCLP with an extension of the existing “special case” E/7 adopted local plan policy to include the adjoining Caius land to the west (which currently lies outside the E/7 designation), but which is essential in order to deliver the critical mass of space for AvTech and IWM LAB.
- 6.4 Section 2 that deals with the overall AvTech concept setting out the need for expansion space at Phase 2 east of the M11. In this context whilst Phase 2 delivery timescales are later in the plan period (6 year plus) it is vital to provide market confidence that the local planning process has recognised the importance of Duxford AvTech Phase 1 and Phase 2 AvTech to economic growth. Further the value of the residential proposals in AvTech Phase 2. As such we ask that Duxford Phase 2 (AvTech and residential) is also allocated for the emerging GCLP.
- 6.5 AvTech as a whole is a golden opportunity for Cambridge and the UK to be a global leader and innovator. We ask that through the CfS 2025, and subsequent sites assessment recognises there is a special case to allocate both Sites for inclusion in the emerging Greater Cambridge Local Plan as a specialist (advanced aviation technology) economic growth cluster in the rural area outside the Green Belt at Duxford.

7 CFS 2025 – SITE REFERENCING

- 7.1 In the CfS 2020 and Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) Report 2021, the proposals west (Duxford AvTech Phase 1) and east of the M11 (Duxford AvTech Phase 2 and 800 new homes) had the same single site reference number (Site Ref 40095), albeit this was titled as “Land east of M11, west of Duxford, Duxford, CB22 4QG”.
- 7.2 Notwithstanding the clear economic and commercial linkage of the (AvTech) proposals (see sections 2 and 3) , for reasons of clarity we consider the CfS 2025, and subsequent assessment would benefit from addressing the Duxford AvTech Phase 1 proposals and the Duxford Village AvTech Phase 2 proposals (east of the M11) as two separate site references given the different nature of the site characteristics, context, proposals and timescales involved.
- 7.3 It is considered this would be a more pragmatic approach allowing a clear assessment of the respective site characteristics.
- 7.4 Having sought guidance from the local planning authority, we are therefore submitting two pro forma (as amendments to an existing submission - Ref 40095) for the CfS 2025, i.e.
- New Site - Land west of the M11 - IWM Duxford - Phase 1 AvTech and IWM LAB (58,000- 65,000 sqm - specialist employment space)-
 - Amended Site - Land east of the M11 - Duxford – Phase 2 AvTech (70,000 sqm specialist employment, 800 dwellings, new country park, social and community infrastructure –
- 7.5 It is suggested that this could be handled by naming the Sites a and b under the same reference to recognise the linked nature of the Sites.