

# Tulley Bunting

## **GREATER CAMBRIDGE LOCAL PLAN: FIRST PROPOSALS CONSULTATION 2021**

Response to Call for Sites HELAA assessment prepared by Tulley Bunting on behalf of Imperial War Museum (IWM) and Gonville and Caius College (Caius)

13 December 2021

### **HELAA SITE REFERENCE – 40095**

- 1.1 Caius originally responded to the “Call for Sites” in 2019 and proposed 110,000 sqm of employment space (for an aviation and air mobility innovation cluster – “Avtech”) at Duxford and a 800 homes expansion of Duxford Village.
- 1.2 IWM and Caius subsequently responded jointly to the “Call for Sites” in 2020, proposing a first phase of Avtech at IWM Duxford (“Avtech 1” - circa 40,000 sqm of employment space for an aviation/mobility innovation cluster ), and a second phase of Avtech (“Avtech 2” - circa 70,000 sqm of employment space for an aviation/mobility employment space at Duxford, east of the M11/south of the A505, with an associated 800 home expansion of Duxford Village.
- 1.3 In September 2021 Greater Cambridge Shared Planning Service published the Greater Cambridge HELAA, which provided an initial assessment of the sites put forward for allocation as part of the Call for Sites consultation within Greater Cambridge. This found the proposed sites (Reference – 40095) were “Available” (Green) and “Achievable” (Green), but “Unsuitable” (Red) in terms of the potential impact on the historic environment.
- 1.4 IWM and Caius have made representation to the “First Proposals” consultation, and consider the sites are suitable.
- 1.5 This report forms part of the IWM and Caius representation and follows the HELAA assessment format and specific criteria considered. For the reasons given in the following table, it is considered a number of the assessment criteria should be re-considered and the sites accepted as suitable and included as an allocation in the Greater Cambridgeshire Local Plan.
- 1.6 As well as commenting on the specific assessment criteria, it is considered that the September 2021 HELAA assessment did not address the unique nature and public benefits to the Greater

Cambridge economy of the aviation and air mobility proposals and appears to have focused solely on the original 2019 proposals (east of the M11) and have not assessed the 2020 “call for sites” which proposed a first phase of “Avtech” proposal at IWM Duxford ( west of the M11) as well as the second phase of Avtech at Duxford.

<b>HELAA Site reference 40095</b>	Avtech1 (IWM Duxford/Caius land) – 40,000 sqm employment Avtech2 (Caius land) – 70,000 sqm employment, 800 homes		
<b>HELAA ISSUE</b>	<b>HELAA 2021</b>	<b>PROPOSED UPDATE</b>	<b>COMMENTS</b>
<b>Site Assessment Summary</b>			
Suitability	Red	Amber	See comments below
Available	Green	Green	
Achievable	Green	Green	
Adopted development plan policies	Amber	Amber	In addition to the policies and allocations noted in the HELAA assessment we add that the Avtech 1 proposal at IWM Duxford is covered as a “special case” by Policy E/7.
Flood risk	Amber	Green	The HELAA recognises both sites/Avtech phases are located wholly in Flood Zone 1 and are at a low risk of surface water flooding with only 2% of the sites at risk from surface water flooding in a 1 in 1,000-year event. Given the combined sites’ large size (175 ha), any small areas of the sites that are within surface water flood risk areas would be located outside of developable areas.  As such it is requested that the HELAA assessment is updated to GREEN.
Landscape and townscape	Amber	Amber	The submitted masterplan proposals for the Avtech development locate development to the east of the M11, south of A505 and north of Duxford village where the “open countryside” aspect of the site has been most eroded by modern infrastructural and development interventions.  The proposals would preserve clear expanses of open countryside between neighbouring settlements and create more positive and defensible boundaries to the countryside which will continue to bound Duxford on all sides. 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.

			<p>Highway interventions have eroded the open aspect of the land around the village 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.</p> <p>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.</p> <p>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). Four green wedges have been included in the AvTech development to create views and route through to the Village.</p> <p>The proposal would not lead to any “coalescence” of villages and settlements – rather it would enhance them by clearer definition of boundaries.</p>
Open space/green infrastructure	Green	Green	The masterplan proposals include provision of a new publicly accessible 40 ha country park which would substantially increase local capacity and access to open space and green infrastructure.
Historic environment	Red	Amber	<p>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.</p> <p>The Avtech 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 for future.</p> <p>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</p>

			<p>village expansion proposals do not adjoin the defined conservation area and is at distance from listed buildings and would have little or no impact on its setting.</p> <p>The scale of development proposed is in line with, or lower than, general existing building heights in both conservation areas.</p> <p>The Avtech 1 proposal at IWM Duxford 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.</p> <p>As such it is requested that the HELAA assessment is updated to AMBER.</p>
Archaeology	Amber	Amber	<p>Archaeology is categorised as ‘amber’ in the HELAA assessment, due to the site being “located in intensive multi-period landscape”.</p> <p>Full archaeological studies and detailed design with the input of heritage specialist including County Archaeological Service will be undertaken following the Call for Sites process.</p>
Accessibility to services	Amber	Green	<p>The HELAA assessment comments... “adequate accessibility to key local services, transport and employment opportunities...and...proposed development would not require delivery of accompanying key services”. As such and given the proposal would be delivering new/extended primary school, and enhanced community facilities and local commercial services.</p> <p>It is requested that the HELAA assessment is updated to GREEN</p>
Site access	Amber	Green	<p>The HELAA assessment says.... “potential access constraints could be overcome through development.”</p> <p>We would agree and it is therefore requested that the HELAA assessment is updated to GREEN</p>
Transport and Roads	Amber	Green	<p>The HELAA assessment says the site is ...“located close to Whittlesford parkway...any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated”. We agree and note that both IWM and Caius are eager to work with the delivery of the Whittlesford Parkway masterplan to create more sustainable travel modes. It is noted the the A505 corridor study is ongoing, and that the</p>

			<p>call for sites submission made clear that the promoters would play their part in required highway improvements, including the ability to use their land to widen/improve the A505 corridor if required.</p> <p>It is requested that the HELAA assessment is updated to GREEN.</p>
Noise, vibration, odour, light pollution	Amber	Green	<p>In respect of IWM Duxford, the proposals would be accompanied by full assessment of any noise and light impacts associated with any additional flight movements involving Avtech vehicles (used mainly for testing purposes with no passenger or cargo craft involved).</p> <p>For Avtech 1 and Avtech 2/Duxford village expansion noise levels are currently largely generated from the A505 to the north and M11 to the west. The proposals and associated landscaping offer a significant opportunity to mitigate existing noise impacts from the existing strategic road infrastructure within the existing settlement and within open spaces adjacent to the village to the west and north, by shaping the landform, vegetation, and development in a comprehensive way.</p> <p>It is requested that the HELAA assessment is updated to GREEN</p>
Air quality	Amber	Green	<p>The site is not located within an Air Quality Management Zone. The proposal would be accompanied with required mitigation.</p> <p>It is requested that the HELAA assessment is amended to GREEN</p>
Contamination and ground stability	Amber	Amber	<p>Development land is primarily in agricultural use, though past military use will require assessment.</p>
Constraints to development			<p>The proposal would result in the loss of land currently in agricultural use. The Agricultural Land Classification maps indicate that the site is almost entirely Grade 2. However, whilst a full survey is required, we are aware the most up to date and detailed soil analysis of the local Duxford area was carried out in respect of approximately 12.365 hectares (30.55 acres), at Junction 10 of the M11 (i.e. the north western corner of the College's proposals). When surveyed in November 2016, and combined with evidence from a desk top study, the site was shown to have four distinct soil types, which was found to comprise approximately only 13% Grade 2 land, with the remaining 87% classified as Grade 3a. Whilst the full area of agricultural land covered by the proposal has not been surveyed, this would suggest the wider area is also most likely to be Grade 3a.</p>
Strategic highways impact	Amber	Green	<p>The HELAA assessment says the site is ...<i>located close to Whittlesford Parkway...any</i></p>

			<p><i>potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated</i>". We would agree and note that both IWM and Caius are eager to work with delivery of the Whittlesford parkway masterplan to create more sustainable travel modes. It is noted the the A505 corridor study is ongoing, and that the call for sites submission made clear that the promoters would play their part in delivering required highway improvements, including the ability to use their land to widen/improve the A505 corridor if required.</p> <p>It is requested that the HELAA assessment is updated to GREEN.</p>
Employment			<p>The proposal would deliver a globally significant aviation innovation centre focused on low carbon air mobility vehicles (on site R&amp;D, testing, and manufacture). It would deliver circa 1800 -2400 FTE jobs when complete. It would therefore comply with adopted plan policies IWM Duxford including "special case" proposals (E/7), support for innovation clusters which would embrace Avtech's technologies (E/9), and support for growth of aviation where it brings economic benefits (T1/5); the NPPF (2021) support at Paras 81, 82, 83 and 104 for economic growth and aviation and the emerging OxCam ARC corridor focus on supporting innovation clusters.</p>
Green Belt			<p>The site lies outside the Green Belt</p>

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