



Greater Cambridge Local Plan team  
Greater Cambridge Shared Planning Service,  
Cambridge City Council,  
PO Box 700, Cambridge, CB1 0JH

Our ref: PL00668708

Telephone [REDACTED]

13 December 2021

Dear Mr Kelly

**Greater Cambridge Local Plan First Proposals Public Consultation November 2021**

Thank you for consulting Historic England on the First Proposals Public Consultation for the Greater Cambridge Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

Cambridge is a beautiful, compact and historic city. It is also an historic seat of learning with a very high concentration of highly graded heritage assets. Much of the city is covered by Conservation Area status. The river corridor, green fingers and open spaces, with cows grazing in meadows even at the heart of the city, shape the character of the townscape and landscape.

Although a relatively flat landscape, the elevated positions to the west and south of the Cambridge afford important views across the city skyline, which is one of extensive tree cover and emerging spires. The flatter Fens landscape to the north and east provides very long-distance views of the City and the big east Anglian skies.

The surrounding rural hinterland of South Cambridgeshire comprises over 100 villages, each with their own unique character and heritage. New settlements are an important feature of the district, with their own special identity and are growing rapidly.

We recognise the area faces intense pressure for growth, driven by both the economic success and the attractiveness of the area, in large part a consequence of



its rich architectural and cultural heritage. This growth must be carefully managed to ensure that the very things that contribute to its success are not harmed in the process.

It is for this reason that Historic England is keen to ensure that the emerging plan gives full consideration to the historic environment, both in the choice of site allocations and policy criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.

We have reviewed the Draft Plan and consultation material with a view to providing advice on heritage matters.

As a general comment, Historic England welcomes emerging plan and work undertaken to date. We have however identified below some of the key issues to be addressed in progressing the next iteration of the Plan: This should be read in conjunction with **Appendix A** which provides more detailed comments on these and other more minor issues.

#### **a) Site Assessment and the need for Heritage Impact Assessments**

We are pleased to note that a degree of site assessment has already been undertaken in relation to the historic environment. These are set out in the HELAA Report, especially Appendix 4.

To date, the assessment of sites is fairly high level and brief but provides a useful starting point, in particular helping to identify immediate showstoppers. We note that many of the sites are shown as amber.

As we have discussed previously, the need for further assessment of heritage in terms of significance, impact on that significance, potential mitigation and enhancements etc will be needed for the site allocations. There is currently an insufficient evidence base in this regard. We therefore welcome your commitment to undertake Heritage Impact Assessments for site allocations. These should be prepared **prior to the next draft of the Local Plan**.

This further assessment, known as **Heritage Impact Assessment (HIA)** should follow the 5 step methodology set out in our advice note, HEAN 3 on Site Allocations in Local Plans <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

HIAs should be proportionate (both to the scale of the site and the assets affected). All potential sites will need to be appraised against potential historic environment





impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site.

Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable.

Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. Cumulative effects of site options on the historic environment should be considered too.

The following broad steps might be of assistance in terms of assessing sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity
- Identify the potential impacts of development upon the significance of heritage asset
- Consider how any harm might be removed or reduced, including reasonable alternatives sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

### Which sites require HIA?

Ideally **all sites** should have an HIA, albeit **proportionate** to the site and heritage sensitivities.

For **existing allocations** being carried forward into this Local Plan, the HIA is less about the principle of development (that has already been established through previous plan allocation) and more about exploring capacity, height, density and any heritage mitigation and enhancement opportunities so that these can then be





included in the updated policy wording.

For **new allocations**, the HIA will be a more holistic view and consider both the principle of development as well as the other matters identified above.

**b) Policy Wording for sites**

If, having completed the heritage impact assessments, it is concluded that a site is suitable for allocation, we would remind you to include appropriate policy criteria for the historic environment in the policy. Please refer to the advice we give on policy wording in the attached table.

It can be helpful to refer to an HIA in the policy wording. Concept diagrams can also be useful to include in the plan to illustrate key site considerations/ recommendations.

**c) Edge of Cambridge sites**

The Plan proposes carrying forward a number of partially built out allocations on the edge of the City as well as some minor extensions to these. The Plan also proposes revisiting the dwelling capacity/density for some of these sites e.g. Eddington.

Proposals for North East Cambridge are very high density and also quite tall.

The Plan also includes a very large new allocation at East Cambridge (previously released from the Green Belt and allocated in the 2006 Plan, although not in the 2018 Plan). The number of dwellings now being proposed represents a significant increase in density from the 2006 Plan.

We have some concerns regarding these densities and heights on edge of Cambridge sites. Development at very high densities/heights and the potential impact on the overall setting of this historic city. HIAs should give careful consideration to the issue of development and site capacity and height – we will be looking for evidence in this regard.

**d) Historic Environment Policy**

We welcome your intention to include a policy for the Historic Environment. This should cover both designated and non-designated heritage assets. Policy wording should be **in line with the NPPF but we are also looking for a local flavour**.





Policies should be spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation.

You should also include a policy for **Heritage at Risk** and a policy for **historic shopfronts**. For further detail see Appendix A.

e) **Design Policy**

We welcome the proposals for a design policy on the plan. We note that this policy is also intended to address tall buildings. We are concerned that the policy might become overly long and detailed, given it is covering such a wide and important range of issues and wonder whether separating out tall buildings into a separate policy might be helpful?

f) **Tall Buildings Study and Policy**

Related to the above, given the growth pressures that we would anticipate Cambridge is likely to experience over the coming years, we are pleased to see that the matter of Tall buildings and the skyline will be addressed in policy.

We had understood that you were commissioning a study in relation to tall buildings and the skyline policy. Is this still proposed to inform the policy in the next draft of the Local Plan?

See our advice note HEAN 4 and the consultation draft of HEAN 4. Any policy should indicate what considerations are needed for taller buildings, where buildings may or may not be appropriate etc. and in particular consider in the impact on the historic environment.

We broadly welcome policy 60 and Appendix F of the 2018 Cambridge City Local Plan. However, we consider that this could be further supplemented to indicate which areas may or may not be suited to taller buildings. Our advice note in relation to tall buildings provides further guidance in this respect

We have been having discussions with the team preparing The North East Area Action Plan in relation to tall buildings studies and have provided a detailed advice letter in that regard. Please refer to our advice letters in relation to NEA Action Plan and tall buildings for further information on our position.





**g) Other Supporting Evidence**

We welcome the preparation of the HELAA although consider that further, more detailed evidence is needed in relation to heritage impact and so welcome your intention to prepare HIAs for site allocations.

We broadly welcome the Strategic Heritage Impact Assessment including the baseline study of the setting of Cambridge. However, we have expressed some concerns regarding some aspects of this baseline, in particular the weighting given to some of the key characteristics and aspects of setting of Cambridge including views. Further detail is given in Appendix A.

We welcome the evidence in relation to landscape character assessment. We do however continue to suggest that it would also be helpful to commission Historic Landscape Characterisation work for inform this Plan and future growth in the area.

We welcome the production of the Sustainability Appraisal. We would comment however that since many of the site allocations are grouping together under particular policies, the different impacts for individual sites are not always drawn out in the assessment tables – this sometimes has the effect of neutralising the scoring.

**Historic England – Ox Cam research work**

Historic England has commissioned consultants to undertake some work looking at development in the OxCam Arc. 'Measuring Impact: Managing Change' looks at the question, 'How should the form of growth in the Oxford-Cambridge arc positively respond to the Historic Environment'. This research is due to report in the next few months and we hope to be able to share this with you at that time as it may provide useful evidence to inform your Local Plan work.

**Other comments**

In preparation of the forthcoming Greater Cambridge Local Plan, we encourage you to draw on the knowledge of local conservation officers, archaeologists and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular





allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We trust that these comments are helpful to you in developing the Local Plan. Should you have any queries, please do not hesitate to contact us.

We suggest it might be helpful to set up a meeting to discuss our comments and, in particular, heritage impact assessments and policy wording for site allocations. Please feel free to suggest some dates.

Yours sincerely

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Historic Environment Planning Adviser  
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