

**Appendix A: Table of Historic England’s comments on the Draft Greater Cambridge Local Plan**

<b>Page</b>	<b>Section</b>	<b>Support/ Object/ Comment</b>	<b>Comments</b>	<b>Suggested Change</b>
53	Para 2	Object	Welcome reference to the protection and enhancement of historic core but need to consider that the setting of Cambridge is broader than that...views into and across this historic city are important too.	<i>Amend paragraph to consider wider setting of Cambridge</i>
	<b>Site Allocations</b>			
		Object	<p><b>General comments on site assessment HELAA and Heritage Impact Assessments</b></p> <p>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.</p> <p>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.</p> <p>As we have discussed previously, further assessment in terms of significance, impact on that significance, potential mitigation and enhancements etc will be needed of the sites.</p> <p>We welcome the preparation of a Strategic HIA and also a detailed HIA for the NEC to support the AAP.</p> <p>We also welcome your commitment to undertake Heritage Impact Assessments for site allocations as at present there is insufficient evidence for the sites in relation to impact on the historic environment. These should be prepared prior to the next draft of the Local Plan.</p> <p>Further detail on this is given in our letter and also our response to Policy GP/HA Conservation and Enhancement of heritage assets.</p>	<i>Complete HIAs for site allocations</i>
		Comment	<p><b>General comments on policy wording for site allocations</b></p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that</p>	<i>Use HIAs to inform policy wording. Include historic environment criteria in policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>Where a site has the potential to affect a heritage asset, we would expect to see the following typical wording within the policy:</p> <p><i>Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their settings. Appropriate mitigation measure including... will be required.'</i></p> <p>The policy wording should mention the specific designated heritage assets both on site and nearby.</p> <p>The policy and supporting text should also refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or heritage buffer/set back/breathing space etc.</p> <p>It can also be helpful to refer to an HIA in the policy wording where one has been prepared. Concept diagrams can also be useful to include in the plan to illustrate key site considerations/ recommendations.</p> <p>In drafting policy wording for site allocations please ensure that policy wording/supporting text is consistent with the advice above.</p> <p>By following this advice in relation to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p> <p>Given the inclusion of reference to significance and setting we suggest that these terms (which are quite technical) are included in a glossary.</p>	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
53	<b>Cambridge Urban Area</b>			
55	<b>North East Cambridge</b>			
55	Policy S/NEC North East Cambridge	Object	<p>We broadly welcome the allocation of this strategic brownfield site. It offers an exciting opportunity for regeneration in a highly accessible, sustainable location. It will be important that the policy ensures the protection and enhancement of the historic environment including the conservation areas, river corridor and wider city scape.</p> <p>We welcome the preparation of an HIA for the site although as previously discussed we have raised some concerns about some aspects of the HIA. The HIA should inform the policy wording in the Plan as well as the NEC AAP.</p> <p>We look forward to ongoing work with you over the coming months as the revised Draft Local Plan and AAP are developed. Areas that will still need to be addressed include detailed consideration of heights, densities, mass, views from Anglesey Abbey, views from the south, revised wirelines/photomontages of reduced heights, consideration of issues such as light etc and the general treatment of the edge of City site including heritage sensitivities along the river corridor and from other assets.</p>	<i>Ensure Historic environment considerations are included in policy, including recommendations of HIA. On-going discussions in relation to detail.</i>
59	<b>Policy S/AMC Areas of Major Change</b>			
60	Station Area West and Clifton Road	Object	<p>Parts of this area are located within the New Town and Glisson Road Conservation Area. Cambridge Station is also listed at Grade II.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			Any development would need to preserve or where appropriate enhance the character or appearance of the conservation area and Development should conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset).	
60	Fitzroy/Burleigh Street/Grafton	Object	<p>Parts of this area lie within the Kite conservation area. There are also a number of listed buildings in this area including the grade II* Arts Theatre Workshop and store and 38 Newmarket Road and 17 Fitzroy Street, both listed at grade II. There are also a number of listed buildings nearby.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
60	South of Coldhams Lane	Object	<p>There are no designated heritage assets on this site, but the Mill Road conservation area lies adjacent to the north west boundary of the site.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
60	Cambridge Biomedical Campus and CBC Extension	Object	<p>There are no designated heritage assets within the boundary of the Cambridge Biomedical Campus or extension. However, the grade II listed Nine Wells Monument and lies approximately 200 metres to the south west of the site and a Scheduled Monument lies approximately 270 metres to the west of the site. There are also wider, long range views from Wandlebury and the Gogs across the site and City.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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60	West Cambridge	Object	<p>The grade II* listed Schlumberger Gould research Centre is located within the West Cambridge site. There are two Conservation Areas, West Cambridge and Conduit Head Road adjacent to the site (and their associated listed buildings).</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Any policy for the site should refer to these heritage assets and the need to conserve and enhance the significance of these assets including any contribution to that significance by settings.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
60	Land between Huntingdon Road and Histon Road	Comment	There are no designated heritage assets on this site.	
62	<b>Policy S/OA Opportunity Areas in Cambridge</b>			
63	<b>New OA</b>			
63	S/OA/NR Newmarket Road	Object	<p>Whilst there are no designated heritage assets within this site boundary, there are a number of designated heritage assets in close proximity to the site including the Grade II listed 247 Newmarket Road (Seven Stars Pub) and also the grade II listed Cambridge Gas Company War Memorial (in the area of public open space in front of Tesco). Further to the north of the site lies the grade I listed Chapel of St Mary Magdalene Stourbridge Chapel (also known as the Leper Chapel). This complete and little altered Chapel dating from the mid-12<sup>th</sup> century, is the Property of Cambridge Past Present and Future and contains unusual architectural and carved decoration. There is a further cluster of grade II listed properties (The Round House, The Globe Public House and Papermills) just beyond the bridge. The site</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>also lies close to Riverside and Stourbridge Common Conservation Area.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	
63	S/OA/BC Beehive Centre	Object	<p>Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the Mill Road Conservation Area.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
65	S/OA/Abbey Stadium	Object	<p>Whilst there are no designated heritage assets within this site boundary, the site lies immediately opposite a cluster of grade II listed properties (The Round House, The Globe Public House and Papermills), the Riverside and Stourbridge Common Conservation Area and close to the grade I listed Chapel of St Mary Magdalene Stourbridge Chapel (also known as the Leper Chapel).</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
66	S/OA/CH Shire Hall/Castle Park	Object	<p>This site includes a variety of designated heritage assets including Cambridge Castle Mound which is a scheduled monument, Castle and Victoria Road Conservation Area, the grade II listed Caretaker's House and Social Service Department. The site is very close to a number of other designated assets including the grade II listed Castle Brae, The Castle Inn and several other grade II listed buildings on the other side of Castle Street. The grade II* churches of St Peters and St Giles are also close to the site.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			<p>It is worth noting the possibility of non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments (NPPF footnote 68) adjacent to the Castle scheduled monument.</p> <p>The Castle Mound is a key vantage point across the City. We would want to see access to the castle mound maintained and enhanced.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>We welcome the reference to heritage assets on p 66.</p>	
66	<b>Existing OA</b>			
66	S/OA Mitcham's Corner	Object	<p>This site includes parts of the Central and Castle and Victoria Road Conservation Areas and is very close to the grade II listed Victoria Bridge, Jesus Green Lock and Bridge, Jesus Green Lock House as well as a pair of K6 telephone Kiosks.</p> <p>Any development of this site has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
66	S/OA/Eastern Gate	Object	<p>This site includes parts of the Riverside and Stourbridge Common and Mill Road Conservation Areas and the grade II listed Church of St Andrew the Less. There is also a cluster of grade II listed assets to the north of the site centred on Abbey House. The area also includes the Grade II listed 247 Newmarket Road (Seven Stars Pub) and also the grade II listed Cambridge Gas Company War Memorial (in the area of public open space in front of Tesco).</p> <p>Any development of this area has the potential to impact upon the heritage assets and their settings. Therefore we recommend you</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording	
66	S/OA Mill Road	Object	<p>The Mill Road Opportunity Area contains parts of the Mill Road, Kite and Glisson Road Conservation Areas. It also includes two grade II listed buildings or structures including a gas lamp and Cambridge City Branch Library. Part of Mill Road Cemetery, a Registered Park and Garden listed at grade II also lies within the opportunity area.</p> <p>Any development of this area has the potential to impact upon the heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
66	S/OA/Cambridge Railway Station/Hills Road Corridor to City Centre	Object	<p>The site includes parts of the Central and New Town and Glisson Road Conservation Areas. There are numerous listed buildings including the Grade II * Church of our Lady and the English Martyrs, Wanstead House and over 20 grade II listed buildings. The site also lies adjacent to the Botanic Gardens and Emmanuel College, both grade II* Registered parks and gardens.</p> <p>Development within this area therefore has the potential to harm the significance of these assets through development within their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording. Careful consideration should be given to the issue of heights in this area.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
66	S/OA Old Press/Mill Lane	Object	<p>This site is located in the Central Conservation Area and includes over a dozen grade II listed buildings. The site is opposite the grade I listed Pembroke College and Pembroke College Chapel, grade I listed Church of St Botolph and adjacent to the grade II* Little St Marys Church. The site is close to numerous other listed buildings and the grade II Registered Park and Garden of Queens College.</p> <p>Development within this area therefore has the potential to harm the significance of these assets through development within their settings. Therefore we recommend you prepare an HIA. The</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			recommendations of the HIA should then be used to inform the policy wording.	
68	<b>Policy S/LAC Other site allocations in Cambridge</b>			
68	S/C/SMS Garages between 20 St Matthews Street and Blue Moon Public House, Cambridge	Object	<p>Whilst there are no designated heritage assets within the site boundary, the site lies adjacent to the boundary of the Mill Road Conservation Area and close to the grade II Listed Church of St Matthew.</p> <p>Development within this area therefore has the potential to harm the significance of these assets through development within their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
69	S/C/SCL Land South of Coldhams Lane, Cambridge	-	No comments	
70	<b>Existing Allocations</b>			
70	S/C/R2 Willowcroft 137 – 143 Histon Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Castle and Victoria Conservation Area lies adjacent to the site.</p> <p>Development of the site has the potential to impact upon the Conservation Area and its setting. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the conservation area and the need for 'Development to preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting'</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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70	S/C/R4 Henry Giles House	Object	<p>The site lies within the Castle and Victoria Conservation Area, adjacent to the Central Conservation Area and fronting the river, the of the river opposite Jesus Green.</p> <p>Although we have no objection to the principle of redevelopment on this site, this is a sensitive location with the potential to impact on the historic environment. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>We also recommend that the policy includes reference to the historic environment and that 'Development should conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset)'.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/R5 Camfields Resource Centre and Oil Depot, 137-139 Ditton Walk	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Riverside and Stourbridge Common Conservation Area lies adjacent to the site.</p> <p>Development of the site has the potential to impact upon the Conservation Area and its setting. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the conservation area and the need for 'Development to preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting'.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/R6 636 - 656 Newmarket Road, Holy Cross Church Hall, East Barnwell Community Centre and Meadowlands,	-	No comments	

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	Newmarket Road			
71	S/C/R9 Travis Perkins, Devonshire Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Mill Road Conservation Area lies adjacent to the site.</p> <p>Development of the site has the potential to impact upon the Conservation Area and its setting. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the conservation area and the need for Development to preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/U3 Grange Farm off Wilberforce Road	Object	<p>The site includes part of the West Cambridge Conservation Area.</p> <p>Development of the site has the potential to impact upon the Conservation Area and its setting. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the conservation area and the need for Development to preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/M4 Police Station, Parkside.	Object	<p>The site is located within the Kite Conservation Area and to the south of the terrace of properties fronting Parkers Piece, many of which are listed at grade II. We welcome reference to the retention of the Building of Local Interest.</p> <p>Development of the site has the potential to impact upon the nearby heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the nearby heritage assets and that Development should conserve/sustain or where appropriate enhance</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset).	
71	RM1 and Policy H7 Fen Road – Residential moorings	Object	<p>Historic England would wish to know more about the archaeological potential of this site, including its potential significance, before we can comment on the suitability of this site, especially as there would not be an option for retention in-situ of any remains.</p> <p>The site is located across the river from the Fen Ditton and Riverside and Stourbridge Common Conservation Areas.</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	<b>Mixed Use</b>			
71	S/C/R21 315 - 349 Mill Road and Brookfields	Object	<p>Part of the site lies within the Mill Road Conservation Area.</p> <p>Development of the site has the potential to impact upon the Conservation Area and its setting. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the conservation area and the need for development to preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/M2 Clifton Road Area	Object	<p>Whilst there are no designated heritage assets within the site, the New Town and Glisson Road Conservation Area lies on the other side of the railway line.</p> <p>Development in this area has the potential to impact upon the Conservation Area and its setting. Therefore we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			The policy should reference the conservation area and the need for development to preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting.	
71	S/C/M5 82-88 Hills Road and 57-63 Bateman Street	Object	<p>This site is located in the New Town and Glisson Road Conservation Area and adjacent to the Botanic Gardens which is a grade II* Registered Park and Garden.</p> <p>Development of the site has the potential to impact upon the nearby heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the nearby heritage assets and that Development should conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset).</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/M14 Station Road West	Object	<p>The majority of this site lies within the Glisson Road and New Town Conservation Area. The site also includes the grade II listed Railway Station.</p> <p>Development of the site has the potential to impact upon the nearby heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy should reference the nearby heritage assets and that Development should conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset).</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/M44 Betjeman House	Object	This site is located in the Glisson Road and New Town Conservation Area, lies adjacent to the grade II* Botanic Gardens, a registered park and garden and close to the grade II listed War Memorial and milestone.	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			Development within this area therefore has the potential to affect the significance of these assets through development within their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.	
71	Old Press/Mill Lane	Object	<p>This site is located in the Central Conservation Area and includes over a dozen grade II listed buildings. The site is opposite the grade I listed Pembroke College and Pembroke College Chapel, grade I listed Church of St Botolph and adjacent to the grade II* Little St Marys Church. The site is close to numerous other listed buildings and the grade II Registered Park and Garden of Queens College.</p> <p>Development within this area therefore has the potential to affect the significance of these assets through development within their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/U2 New Museums, Downing Street	Object	<p>This site is located in the Central Conservation Area. It contains 5 grade II listed buildings. There are numerous other listed buildings nearby along Bene't St, Free School Lane and Downing Street, most notably the grade I listed St Benet's Church, grade I listed Corpus Christi College and grade II* Pembroke College New Court.</p> <p>Development within this area therefore has the potential to harm the significance of these assets.</p> <p>Development within this area therefore has the potential to affect the significance of these assets through development within their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
71	S/C/SS/1 Orchard Park	-	No comments	
76	S/CE Cambridge East	Object	The site includes the grade II listed Marshalls Airport Control and Office buildings. The Teversham Conservation Area and its associated listed buildings including the grade II* Church of All	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			<p>Saints. The Moated Site at Manor Farm to the east of the site is a scheduled monument, with the Manor Farmhouse itself being listed at grade II. There are several grade II listed buildings to the south on the edge of Cherry Hinton and St Andrews Church Cherry Hinton is listed at Grade I.</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>This is a large allocation on this edge of Cambridge site, on land previously released from the green belt. We note that the proposed capacity of the site is considerably more than in the 2006 plan (now 7000 dwellings on a site smaller than the previous site for 4,660 dwellings). The site is on the very flat, fen edge of the city and there are long distance views from as far out as the A11. This raises the question of the likely density and scale of development on this edge of city location. The HIA should also explore issues of capacity, height and density and the implications of this on the overall setting of the city.</p> <p>We recognise the importance of the green corridor to help protect the separate identify of Teversham. This should be maintained as Green Belt.</p>	
82	S/NWC North West Cambridge	Object	<p>Whilst the site does not include any designated heritage assets the site lies adjacent to Conduit Head Road and Storey's Way Conservation Areas and their associated listed buildings. Girton College listed at Grade II* and lodge (grade II lie to the north of the site. The American Military Cemetery, a grade I Registered Park and Garden lies at an elevated position of the west of the site, commanding long ranging views across the site. This contains the grade II* listed memorial and is also adjacent to the grade II * Madingley Mill.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			<p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>We note that there are proposals to increase the capacity of this previous allocation through revising the masterplan for the site, with the potential of between 1000 -15000 additional dwellings over and above those previously allocated. This raises the question of the likely density and scale of development on this edge of city location. The HIA should also explore issues of capacity, height and density. Careful consideration will need to be given to landscape, townscape and heritage impacts.</p>	
85	S/CBC Cambridge Biomedical Campus (including Addenbrooke's Hospital)	Object	<p>Whilst there are no designated heritage assets within the site boundary, there is a scheduled monument known site revealed by aerial photography west of White Hill Farm. There is also a grade II listed monument at Nine Wells with inscriptions including Thomas Hobson, of Hobsons Conduit.</p> <p>Development within this area therefore has the potential to affect the significance of these assets through development within their settings. Long range views are also a potential issue, affecting the setting of the City. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
87	S/CBC - A Possible future expansion adjoining Babraham Road	Object	<p>There are no designated heritage assets in or immediately around this area. However, there are important views of the edge of the city from the higher land to the south and in particular from heritage assets including the scheduled monuments of Little Trees Hill (on Magog Down) and Wandlebury.</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

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			Careful consideration should be given to development in the location, foreshortening the views across the city, including from heritage assets. The city edge in this area is currently screened by mature trees, whereas the site itself is much more exposed in views from the south.	
87	S/CBC/PolicyM1 5 Cambridge Biomedical Campus (Main Campus)	Object	Historic England recognises the important strategic role of the hospital and biomedical campus. Further development of this site should ensure the protection and enhancement of the wider setting of the city, with buildings of an appropriate height, scale and mass for this edge of city location. These considerations should be included in the policy for this area.	<i>Prepare an HIA and use findings to inform policy wording.</i>
87	S/CBC/Policy E2 Cambridge Biomedical Campus Extension- existing committed expansion.	Object	<p>We note that this is an existing allocation. This site lies very close to scheduled monument known site revealed by aerial photography west of White Hill Farm. There is also a grade II listed monument at Nine Wells.</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Long range views are also a potential issue, affecting the setting of the City Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Development in this location will need to conserve and enhance the significance of these heritage assets including any contribution made to that significance by setting. Opportunities should be taken to enhance the setting of these assets through the wider strategic green infrastructure proposals in the area.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
87	Policy 17 – Cambridge Biomedical Campus (including Addenbrooke’s Hospital) Area of Major	Object	We welcome the proposals for green infrastructure and biodiversity improvements. We suggest that this is widened to include historic environment enhancements given the scheduled monument and other archaeological finds in the area as well as the monument at Nine Wells. The opportunity should be taken to enhance the setting of these assets. This could be informed by the HIA for the area as a whole.	<i>Prepare an HIA and use findings to inform policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Change: An expanded Area of Major Change incorporating allocations and green infrastructure		As with other sites along this edge of the City long range views are also a potential issue, affecting the setting of the City.	
91	S/WC West Cambridge	Object	<p>The grade II* listed Schlumberger Gould Research Centre is located within the West Cambridge site. There are two Conservation Areas, West Cambridge and Conduit Head Road adjacent to the site (and their associated listed buildings).</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Any policy for the site should refer to these heritage assets and the need to conserve and enhance the significance of these assets including any contribution to that significance by settings.</p>	<i>Prepare an HIA and use findings to inform most appropriate locations for development and also policy wording.</i>
94	<b>S/EOC Other site allocations on the edge of Cambridge</b>			
94	<b>Continuing existing allocations</b>	Comment	<p>The principle of development has already been established on these sites through the previous Local Plan. Some of the sites have already been partially built out or have outline planning permission.</p> <p>We note that the need for policies for these sites will be kept under review, depending on how far development is progressed.</p> <p>If policies are needed, and there are any designated heritage assets on site or nearby, we would expect these assets to be referenced in the policy and supporting text and for any necessary mitigation to be</p>	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			included in the policy. HIAs may be needed to inform policy, depending on heritage sensitivity.	
97	<b>New Settlements</b>			
99	S/CB Cambourne	Object	<p>We note that to date the Plan largely confirms the existing allocations at Bourn Airfield and West Cambourne.</p> <p>We note that until the route and station location is confirmed no specific development area or amount of development is included in the Plan. As this information becomes available, careful consideration will need to be given to potential impacts on the historic environment.</p> <p>These include, but are not limited to designated assets within the current site boundary e.g. Great Common Farmhouse and the barns to the north of the Grange, both listed at Grade II.</p> <p>There are a number of other designated heritage assets nearby. To the north of Cambourne lies New Inn Farmhouse and barns, and Oak Tree Cottage all grade II listed. Childerley hall and Chapel (both grade II* listed and various grade II listed buildings lie within the grade II* Registered Park and Garden of Childerley Hall. The Conservation Areas of Knapwell and Elsworth, together with their listed buildings, and the scheduled monument, Overhall Moated site also lie to the north.</p> <p>There are a number of Conservation Areas to the south of Cambourne including Caldecote, Bourn Village and Hall, Bourn Caxton End and Caxton. All of these contain numerous listed buildings including the grade I listed church of St Helen and St Mary, Bourn, Manor Farmhouse (grade II*), Bourn Hall grade II*, Bourn Mill (grade I), Church of St Michael and All Angels Caxton Hall, Crown House and the Church of St Andrew, all listed at grade II* as well as numerous grade II listed buildings are located to the south.</p> <p>There are a number of scheduled monuments in the area including Moulton Hills Roman Barrows, a ringwork and bailey castle and 17<sup>th</sup></p>	<i>Prepare an HIA and use findings to inform most appropriate locations for development and also policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>century formal garden remains at Bourn Hall, Caxton moats – medieval moated site and another at Pastures Farm.</p> <p>Finally, there are two further registered parks and gardens in the area at Bourn Hall (grade II) and Longstowe Hall (grade II*).</p> <p>Large scale development in the wider Cambourne area has the potential to impact upon a variety of designated heritage assets.</p> <p>We suggest a heritage impact assessment be undertaken to help determine the most suitable area(s) for growth and to establish what mitigation is likely to be needed to minimise the impacts on the historic environment.</p>	
102	<b>Policy S/NS Existing New Settlements</b>			
103	Northstowe, Waterbeach and Bourn Airfield.	Object	<p>We broadly support the move to carry forward the existing allocations at Northstowe, Waterbeach and Bourn Airfield.</p> <p>In all three cases it is important that the policy identifies onsite and nearby heritage assets and any mitigation measures required to address any impact.</p>	<i>Policies should identify on-site and nearby heritage assets and any mitigation measures required to address any impact.</i>
104	<b>Rural Southern Cluster</b>	Object	General point – Figure 33 Not all of the annotations are correct – for example the new allocations at Gt Shelford and Duxford should be purple.	<i>Check annotations for allocations</i>
106	Rural Southern Cluster S/GC Genome Campus, Hinxton	Object	There are no designated heritage assets within the site boundary. However, the Hinxton Conservation Area lies immediately to the west of the site. This includes Hinxton Hall, the Old Manor House, Oak House n and the Church of St Mary and St John the evangelist, all listed at grade II* as well as numerous grade II listed buildings. To the north of the site lies the grade II listed Hinxton Grange and Stables. To the south of the site lies an important cluster of scheduled monuments, the Roman fort, town, temple and Anglo-Saxon cemeteries at Great Chesterford.	<i>The policy should mention key heritage assets and potential mitigation needed.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>We appreciate that permission has been granted for this development and therefore the principle of development in this location has been established. The policy should however mention the importance of considering historic environment impacts as part of any future proposals. It would be helpful for the policy to mention key heritage assets and potential mitigation needed.</p>	
109	Rural Southern Cluster Policy S/BRC Babraham Research Campus	Object	<p>The site includes the grade I listed Church of St Peters and grade II listed Babraham Hall as well as part of Babraham Conservation Area. There are a number of other listed buildings nearby in the village of Babraham.</p> <p>In addition there is a series of scheduled monuments on the higher land to the north and north west of the site including a long barrow, bowl barrow at Copley Hill, Wormwood Hill Tumulus, Causewayed enclosure and bowl barrow at Little Tree Hill and Wandlebury Camp a multivallate hillfort, earlier univallate hillfort, Iron Age cemetery and 17th century formal garden remains.</p> <p>Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>We welcome the reference to the church and Hall and Conservation Area in the bullet points on page 10. Reference should also be made to the wider offsite heritage assets.</p> <p>The wording should be amended to read, Development should conserve or where appropriate enhance the significance of heritage assets, including the grade I listed St Peters Church, grade II Babraham Hall and Babraham Conservation Area as well as nearby heritage assets (noting that significance may be harmed by development within the setting of an asset).</p>	<p><i>Prepare an HIA and use findings to inform policy wording.</i></p>
112	<b>Policy S/RSC Other site allocations in</b>			

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	<b>the rural southern cluster</b>			
112	S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Stapleford Conservation Area lies adjacent to the site, and includes a number of listed buildings, most notably the grade II* listed St Andrew's Church.</p> <p>Any development of this site therefore has the potential to affect these heritage assets through a change in their settings. Therefore, we recommend you prepare an HIA to determine/confirm whether this site is suitable, and to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
114	S/RCS/MF Land at Maarnford Farm, Hunts Road, Duxford	Comment	There are no designated heritage assets on this site and whilst the Duxford Conservation Area lies to the south east of the site it is separated from the site by development and a playing field.	
115	<b>Employment</b>			
115	S/RSC/CC Fourwentways	Object	<p>Whilst there are no designated heritage assets on site, there is a grade II listed building, the Temple café and restaurant, to the south of the site.</p> <p>Development of the site has the potential to impact the significance of this heritage asset through development within its setting. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>However, given the intervening vegetation and distance we consider the impact of development of the site on the asset is likely to be minimal.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
116	<b>Continuing existing allocations</b>			
116	S/RSC/H1 c Land south of Babraham Road, Sawston	Object	There are no designated heritage assets within the site boundary. However, Sawston Hall a grade II Registered Park and Garden lies to the south west of the site.	<i>Prepare an HIA and use findings to inform policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			Development of the site has the potential to impact the significance of this heritage asset through development within its setting. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.	
118	<b>Policy SCP Policy Areas in the Rural Southern Cluster</b>			
118	S/SCP/WHD Whittlesford Parkway Station Area, Whittlesford Bridge	Object	This proposed policy area includes the scheduled monument and grade II* listed Chapel of the Hospital of St John and the grade II listed Red Lion.  Any development in this area has the potential to affect the significance of these heritage assets. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording. Height is an issue in this very sensitive location.	<i>Prepare an HIA and use findings to inform policy wording.</i>
119	<b>Existing policy Area</b>			
119	S/SCP/L H/6 South of A1307, Linton	Support	This policy area includes part of Linton Conservation area and just over a dozen grade II listed buildings. Development in this area has the potential to impact upon these heritage assets and their settings. We note that the policy restricts residential development in this area to improvements to existing properties. We broadly support this policy approach.	
122	<b>Rest of the Rural Area New allocations</b>			
125	S/RRA/ML The Moor, Moor Lane, Melbourn	-	No comments	
126	S/RRA/H Land at Highfields	-	No comments	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	(phase 2) Caldecote			
127	S/RRR/MF Land at Mansel Farm, Station Road, Oakington	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Oakington Conservation Area lies adjacent to the site. Westwick Conservation Area lies to the east of the site. There are also a number of listed buildings nearby including the grade II* listed St Andrews Church and several grade II listed buildings. Westwick Hall to the east of the site very much overlooks this site, albeit separated by the guided busway.</p> <p>Any development of this site therefore has the potential to affect these heritage assets and their settings including views into and out of the Conservation areas. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
128	<b>Mixed Use</b>			
128	S/RRR/CR Land to the west of Cambridge Road, Melbourn	-	No Comments	
128	<b>Employment</b>			
128	S/RRR/SAS Land south of the A14 Services	Object	<p>Whilst there are no designated heritage assets within the site, there are a number of listed buildings at Boxworth including the grade II* Church of St Peter as well as at Lolworth including the grade II * All Saints Church.</p> <p>Given the scale and mass of typical employment development, there is potential for impact upon the wider historic environment. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>We welcome reference to the need for landscape buffers around the site which should help to minimise impact. There is also considerable</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>existing tree coverage between the heritage assets and the site which should offer some degree of mitigation.</p> <p>If the site is allocated the policy should reference nearby heritage assets and any mitigation required.</p>	
130	S/RRA/BBP Land at Buckingway Business Park, Swavesey	Object	<p>Whilst there are no designated heritage assets within the site, there is a grade II listed barn for the north east of the site.</p> <p>Any development of this site therefore has the potential to affect the listed building and its setting. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>We would recommend that landscaping be provided along the northern and eastern boundaries of the site to minimise visual and heritage impact in this open landscape.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
131	S/RRA/SNR Land to the north of St Neots Road, Dry Drayton	Object	<p>Whilst there are no designated heritage assets within the site, the grade II* Registered Park and Garden, Childerley Hall lies to the north of the site. There are a number of listed buildings within the designed landscape.</p> <p>Any development of this site therefore has the potential to affect the Conservation Areas and their settings including views into and out of the Conservation areas. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
132	S/RRA/OHD Old Highways Depot, Twenty Pence Lane, Cottenham	Object	<p>Whilst there are no designated heritage assets within the site, the Cottenham Conservation area is next to the south western corn of the site. The grade I listed Church of All Saints is very nearby as are two grade II listed buildings.</p> <p>Any development of this site therefore has the potential to affect these heritage assets and their settings including views into and out of the Conservation areas. Therefore, we recommend you prepare an</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			HIA. The recommendations of the HIA should then be used to inform the policy wording.	
133	<b>Existing Allocations</b>			
133	<b>Housing</b>			
133	S/RRA/H/1 d Land north of Impington Lane, Histon and Impington	-	No comments – this site is committed, and part built out??	
133	<b>Employment</b>			
133	S/RRA/E/5 (1) Norman Way, Over	Object	<p>Whilst there are no designated heritage assets on the site, the scheduled monument and grade II listed Over Mill lies to the south west of the site.</p> <p>Whilst the principle of development of this site has already been established and there is a buffer of planting between the site and the assets, any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>However, we recommend that the policy refers to these heritage assets and the need to suitable landscaping mitigation between the asset and the site.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
133	S/RRA/H/2 Bayer Crop Science Site, Hauxton	Object	<p>The principle of development of this site has already been established. Agree the boundary should be amended to show only the area for employment uses. Map on p349 still shows whole site.</p> <p>This part of the site lies very close to the cluster of grade II listed buildings at Hauxton Mill. Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p>	<p><i>Amend site boundary</i></p> <p><i>Prepare an HIA and use findings to inform policy wording.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			The policy for this site should mention these listed buildings and the need for 'Development should preserve the significance of the listed buildings (noting that significance may be harmed by development within the setting of an asset).' Any required mitigation should be included within the policy wording.	
133	<b>Mixed Use</b>			
133	S/SSA/H/3 Fulbourn and Ida Darwin Hospitals	Object	<p>This site lies within Fulbourn Hospital Conservation Area. Any development of this site has the potential to affect these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>The policy for this site should mention the conservation area and state that 'Development should preserve, or where opportunities arise, enhance the character or appearance of the Conservation Area and its setting'. Any required mitigation should be included within the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
136	<b>Policy S/RRP Policy Areas in the rest of the rural area</b>			
	<b>New Policy Area</b>			
136	S/RRP/L East of Bypass, Longstanton	-	No comments	
137	<b>Continuing existing policy areas</b>			
137	S/RRP/E/7 Imperial War Museum, Duxford	Object	There are multiple designated assets on this site including Duxford Airfield Conservation Area, five grade II* listed buildings and over 20 grade II listed buildings. The Conservation Area is on the Heritage at Risk Register. Often the best use for an asset is its original use. However, this clearly has implications for development in the surrounding area.	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>Development in this policy area has the potential to impact these designated heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording. The HIA could draw upon the Conservation Management Plan and emerging masterplan for the site.</p> <p>Reference should be made in the policy and supporting text to these heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). Any required mitigation should be included within the policy wording.</p>	
138	S/RRP/H/4 Papworth Everard West Central	Object	<p>This site includes the part of the Papworth Everard Conservation Area and a pair of listed cottages and 2, Church Lane. Nearby designated heritage assets include the grade II* St Peters Church and Papworth Hall, and several other grade II listed buildings.</p> <p>Development in this policy area has the potential to impact these designated heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Reference should be made in the policy and supporting text to these heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). Any required mitigation should be included within the policy wording.</p> <p>We note that a large permission has been substantially built out in this area. We wonder if it might be appropriate to adjust the boundary of the policy area accordingly?</p>	<p><i>Prepare an HIA and use findings to inform policy wording.</i></p> <p><i>Consider adjusting boundary of policy area.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
138	S/RRP/E/6 Papworth Hospital	Object	<p>This site includes the part of the Papworth Everard Conservation Area and lies adjacent to and in the setting of the grade II* listed Papworth Hall, scheduled monument moated site and close to the grade II listed Lodge.</p> <p>Development in this policy area has the potential to impact these designated heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Reference should be made in the policy and supporting text to these heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). Any required mitigation should be included within the policy wording.</p> <p>As previously discussed, we are keen to work with the Council in preparing a Design Guide SPD for this site to ensure that full consideration is given to the conservation and enhancement of the historic environment on this important brownfield site. The concluding recommendations of an HIA would also help to refine the content of the design code.</p>	<p><i>Prepare an HIA and use findings to inform policy wording.</i></p> <p><i>Work together on Design Guide/Code SPD</i></p>
138	S/RRP/E/5 Fen Drayton Former Land Settlement Association Estate	Object	<p>The Fen Drayton Conservation area and associated listed buildings lies to the east of the site.</p> <p>Any development of the site has the potential to impact these designated heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Reference should be made in the policy and supporting text to these heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an</p>	<p><i>Prepare an HIA and use findings to inform policy wording.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			asset). Any required mitigation should be included within the policy wording.	
138	S/RRP/E/8 Mixed Use Development in Histon and Impington Station Area	Object	<p>There are no designated heritage assets within the site boundary but the Histon and Impington Conservation Area and associated listed buildings lies to the north of the site.</p> <p>Any development of the site has the potential to impact these designated heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.</p> <p>Reference should be made in the policy and supporting text to these heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). Any required mitigation should be included within the policy wording.</p>	<i>Prepare an HIA and use findings to inform policy wording.</i>
143	Climate Change	Comment	<p><b>General comments</b></p> <p>Historic England recognises the urgent need for positive action in response to the global climate crisis and is committed to achieving net zero carbon emissions.</p> <p>Historic England considers these goals to be compatible, as looking after and learning from the historic environment contributes positively to overall global sustainability and can help us adapt to and mitigate for climate change.</p> <p>Further details of Historic England's position on Climate Change and Sustainability can be found via the following link:  <a href="https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/">https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/</a></p> <p>Heritage assets themselves can be affected by climate change, particularly in the case of buried water-logged assets.</p>	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			Heritage assets can also be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation, rather than a constraint.	
155	Policy CC/FM Flooding and integrated water management	Object	<p>We broadly welcome the proposal to include a policy for flooding and integrated water management in the Plan. We make the following comments regarding the policy considerations for flooding/water management and the historic environment and we would expect the emerging policy to reflect these considerations.</p> <p>Policies should acknowledge the risks to <b>traditional buildings</b> from flooding, especially the need for such buildings to be able to dry out slowly and that care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.</p> <p>Refer to Historic England’s guidance note on ‘Flooding and Historic Buildings’: <a href="https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/">https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/</a></p> <p>Policies on <b>Sustainable Urban Drainage Systems (SuDS)</b> should advise that they need to be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS.</p> <p>We advise that <b>waterlogged deposits</b>, such as peat have the potential to preserve organic remains that are relatively rare in the archaeological record. They are of great importance for the information they provide about everyday objects such as drinking and eating vessels (wooden bowls, leather bottles, horn cups), clothing (fabric, shoes), modes of transport (boats, trackways) and equipment of subsistence (fishtraps). To maintain the preservation of <b>organic materials</b>, it is essential that the conditions which contributed to their</p>	<i>Consider incorporating suggestions into policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>survival (waterlogged; anoxic) remain the same. While saturated with water, oxygen is excluded which limits the presence/action of most soil fauna (insects, moulds, and micro-organisms) and fungi which feed on organic matter. The lowering of the water-table in an area could result in the remains becoming exposed to oxygen, which can enhance the degradation and loss of any remains that are present. Refer to Historic England's guidance 'Preserving Archaeological Remains': <a href="https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/">https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/</a></p>	
158	CC/RE Renewable energy projects and infrastructure	Object	<p>We broadly welcome the proposal to include a policy for renewable energy projects in the Plan. We make the following comments regarding the policy considerations for renewable energy projects and the historic environment and we would expect the emerging policy to reflect these considerations.</p> <p>Policies should include consideration of the impact on the historic environment for all commercial renewable energy technologies, including wind power (onshore and offshore), solar photovoltaics (PVs), hydropower, biomass and Energy from Waste facilities (EfW).</p> <p>Refer to Historic England Advice Note 15 (February 2021) for further information on commercial scale renewable energy development: <a href="https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/">https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/</a></p> <p>Para.155 of the NPPF advises LPAs to consider identifying suitable areas for renewable and low carbon energy sources in their plans and strategies. Therefore, your plan's evidence base should include studies assessing areas of potential, particularly for the suitability of wind and solar power generation. An appropriate methodology should be used; i.e. all heritage assets in the area should be identified, arbitrary distance measurements should be avoided, and the setting of heritage assets should also be included as a consideration.</p>	<i>Consider incorporating suggestions into policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>Renewable energy policies should include reference to heritage assets and their settings (in conjunction with Local Plan heritage policies) and should seek to ensure that any harm to the significance of a heritage asset is satisfactorily addressed in the planning balance.</p> <p>The policy, or its supporting text, should not use arbitrary distance measurements for assessments from heritage assets to locations proposed for large-scale renewables. Instead the policy should ensure that settings are fully assessed, on a case by case basis.</p> <p>Biofuel crops such as short rotation coppice (willow) and Miscanthus can have a substantial below ground impact on buried archaeology, especially waterlogged archaeology. Palaeochannels, peats, kettle holes and other glacial features that preserve waterlogged sediments are often the very areas targeted for growing energy crops. Many of these impacts on the archaeological resource are covered by the Preservation of Archaeological Remains guidance (i.e. such as the impacts of dewatering sensitive waterlogged features):</p> <p><a href="https://historicengland.org.uk/images-books/publications/water-features-historic-settings/">https://historicengland.org.uk/images-books/publications/water-features-historic-settings/</a></p>	
161	CC/CE Reducing waste and supporting the circular economy.	Object	<p>We broadly welcome the proposal to include a policy for reducing waste and supporting the circular economy in the Plan. We make the following comments regarding the policy considerations in relation to the historic environment and we would expect the emerging policy to reflect these considerations.</p> <p>Our comments have been formed in line with the NPPF (2021), which sets out the need for heritage assets to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (para.189).</p> <p>The Plan should reference the need to retain, repair, refurbish, retrofit and reuse heritage assets, and especially historic buildings. The following Historic England 'Heritage Counts' information may be</p>	<i>Consider incorporating suggestions into policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>useful: <a href="https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-environment-2020/">https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-environment-2020/</a>  <a href="https://historicengland.org.uk/research/heritage-counts/2020-know-your-carbon/reducing-carbon-emissions-in-traditional-homes/">https://historicengland.org.uk/research/heritage-counts/2020-know-your-carbon/reducing-carbon-emissions-in-traditional-homes/</a>  and also, Energy Efficiency and Traditional Homes - HEAN 14 – <a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/heag295-energy-efficiency-traditional-homes/">https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/heag295-energy-efficiency-traditional-homes/</a></p> <p>Policies/text should recognise <b>sustainability over the long-term</b> - historic buildings represent a significant investment of expended energy. Demolishing/replacing requires a major reinvestment of embodied energy and other resources.</p> <p>Planning policies should encourage &amp; recognise the benefits of sympathetic restoration/retention/refurbishment/retrofit of historic buildings, rather than demolition and replacement.</p>	
172	Policy BG/GI Green Infrastructure	Object	<p>We broadly welcome the proposed inclusion of a policy on Green Infrastructure. In particular, we welcome the reference to reinforcing and enhancing landscape and townscape.</p> <p>Green infrastructure can be very important in mitigating and adapting to climate change. Historic England would highlight that Green Infrastructure should not only be considered in terms of climate change, the natural environment, health and recreation but also the role it can play in conserving and enhancing the historic environment. It can be used to:</p> <ul style="list-style-type: none"> <li>• conserve and enhance heritage assets</li> <li>• improve setting of heritage assets</li> <li>• improve access to heritage assets</li> <li>• create a sense of place and tangible link with local history</li> <li>• create linkages between heritage assets and other green infrastructure</li> </ul>	<p><i>Add additional bullet point to reference the important role green infrastructure has in relation to the historic environment.</i></p> <p><i>Use The Landscape Character Assessment as well as Historic Landscape Characterisation to inform future green infrastructure plans.</i></p> <p><i>Consider further work on HLC</i></p>

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			<p>Conservation and enhancement of the natural environment is an important facet of sustainable development. There is an important synergy between the historic and natural environment. Countryside, landscape parks and the open spaces in our cities, towns and villages often have heritage interest, and it would be helpful to highlight this.</p> <p>Opportunities can be taken to link new GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.</p> <p>An additional bullet point should be added to reference the important role green infrastructure has in relation to the historic environment.</p> <p>Green infrastructure, both existing and proposed, plays a really important role in protecting and enhancing the overall setting of the City of Cambridge, as well as many of the historic villages in the area. This should be acknowledged in the policy.</p> <p>The Landscape Character Assessment as well as Historic Landscape Characterisation should be used to inform future green infrastructure plans.</p>	
180	Policy BG/RC River Corridors	Object	<p>We support the inclusion of a policy for the River Cam in the Plan. The River Cam corridor represents a crucial defining role in the City and surrounding area, part of the setting of the City. It is an important aspect of the historic environment and this inter-relationship needs to be referenced in the policy. The policy should require development to conserve and enhance the River Cam corridor and in particular its role in the wider cityscape.</p>	<p><i>The policy should require development to conserve and enhance the River Cam corridor and in particular its role in the wider cityscape.</i></p>

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185	Policy BG/EO Providing and enhancing open spaces	Object	Open spaces can form an important part of the setting of heritage assets. Both providing and enhancing such spaces is very much linked to the conservation and enhancement of the historic environment. This should be referenced in the policy and supporting text.	<i>Reference role of open space in setting of heritage assets in the policy and supporting text.</i>
206	Policy GP/PP People and Place Responsive Design	Object	<p>We welcome the proposals to include a policy on responsive design. We welcome references to the National Design Guide and National Model Design Code. We recognise the wide range of design guidance already in place across the Plan area. We welcome references to context, historic characteristics, setting, etc.</p> <p>The historic environment is a key aspect of Great Places. We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. Most particularly, we seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design.</p> <p>We highlight the recent publication Building Better Building Beautiful Commission report which may help shape your policy in this area.</p> <p>In respect of tall buildings, we had previously understood that you are completing some work to inform an updated policy. Is this still the intention?</p> <p>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. The policy should be informed by a Tall Buildings and the Skyline study.</p>	<p><i>Prepare tall buildings and the skyline study/evidence</i></p> <p><i>Consider separate policy for taller buildings</i></p>

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			<p>Our advice note in relation to tall buildings provides further guidance in this respect HE Advice Note 4 – tall buildings: <a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/">https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/</a> (10 December 2015). A revision to this guidance is due to be published imminently.</p> <p>The skyline of Cambridge is an important characteristic of the City. In a relatively flat landscape with long distance views both from the elevated land to the south and west, as well as from the flatter fenland to the north and east, particular care needs to be taken over building heights.</p> <p>We suggest that trying to use one policy to cover all aspects of design and tall buildings may prove to be ambitious. It may be helpful to have a separate policy for tall(er) buildings.</p>	
209	Policy GP/LC Protection and enhancement of landscape character	Object	<p>We welcome the proposals to respect, retain and enhance local landscape character as well as the setting of Cambridge and the villages. Development should not only respond to Landscape Character but also historic landscape characterisation – by having a better understanding of the historic landscape enables better, more informed decisions to be made about future development.</p> <p>We welcome references to the River Cam and also views to and from the Greater Cambridge Boundary and on designated and (should read non-designated rather than undesignated) heritage assets. Views of the City itself are also important.</p> <p>We broadly welcome the work to date on the strategic heritage impact assessment and baseline although we have some concerns that views from the south and east of the city are being underplayed – we contend that these are more than minor contributing characteristics to the setting of the City.</p>	<p><i>HLC</i></p> <p><i>Non-designated rather than undesignated</i></p> <p><i>Strategic HIA-look carefully at views from south and east</i></p>
212	Policy GP/GB Protection and enhancement of	Support	We welcome the proposal to include the 3 established local purposes of the Cambridge Green belt which are to	

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	the Cambridge Green Belt		<ul style="list-style-type: none"> <li>• preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre</li> <li>• maintain and enhance the quality of its setting</li> <li>• prevent communities in the environs of Cambridge from merging into one another and with the city</li> <li>•</li> </ul> <p>These three purposes, combined with the NPPF policy on green belts, are still important today and should influence key decisions regarding development in the green belt.</p>	
214	Policy GP/QD Achieving high quality development	Object	<p>We welcome the bullet points on contributing and responding to local character though suggest that there should be greater reference to the historic environment.</p> <p>It is slightly confusing having two design policies separated by several other policies. (GP/PP and GP/QD). It would be helpful if these were together in the document. Also, they need to have separate and distinct purposes. At the moment for example both policies seem to address tall buildings. Suggest revisiting the order, and purpose of each policy and also consider if a separate tall buildings policy would be helpful.</p>	<i>Consider if separate Tall Buildings policy needed</i>
217	Policy GP/QP Establishing high quality landscape and public realm	Object	<p>We welcome the proposal to include a policy for high quality public realm including some of the references to historic street furniture and surfaces. We also welcome the references to local character.</p> <p>For streetscape improvements we would refer you to the Streets for All publications <a href="https://historicengland.org.uk/images-books/publications/streets-for-all/">https://historicengland.org.uk/images-books/publications/streets-for-all/</a>. These documents provide updated practical advice for anyone involved in planning and implementing highways and other public realm works in sensitive historic locations. It sets out means to improve public spaces without harming their valued character, including specific recommendations for works to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements.</p>	<i>Add reference to Streets for All</i>
220	Policy GP/HA Conservation	Object	<p><b>A positive strategy for the Historic Environment</b> Paragraph 190 of the NPPF requires Local Plans to set out a positive</p>	<i>Ensure positive strategy for historic environment <u>throughout</u> the Plan</i>

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	and Enhancement of heritage assets		<p>and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.</p> <p>A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So, policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands.</p> <p>Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.</p> <p>A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.</p> <p>We welcome the intention to include a policy for the conservation and enhancement of heritage assets. The policy(ies) should include the following:</p> <p><b>Strategic policy for the historic environment</b> Strategic policies are a very important part of the plan, particularly</p>	<p><i>Include policies for both designated and non-designated heritage assets</i></p> <p><i>Include policy for Heritage at Risk</i></p> <p><i>Include Policy for Historic Shopfronts</i></p> <p><i>Prepare HIAs for site allocations</i></p>

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			<p>given the need for Neighbourhood Plans to be in conformity with these policies. Paragraph 20 of the NPPF makes it clear that Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision, amongst other things, the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. Paragraph 21 requires that Plans make explicit which policies are strategic policies. Therefore, we would strongly advise the inclusion of a strategic policy that addresses these matters.</p> <p><b>Policies for Heritage Assets</b> The Plan should include policies for both designated (listed buildings, Conservation Areas, Registered parks and gardens, Scheduled Monuments) and non-designated heritage assets. These policies need to be consistent with national policy and legislation and attach the appropriate tests dependent on the level of harm and asset type, although not repeat the NPPF verbatim. Policies should be locally specific wherever possible. More detail is given in relation to each asset type below.</p> <p><b>Listed Buildings</b> Listed buildings include a variety of structures reflecting the areas architectural, industrial and cultural heritage. We will look for policies that carefully consider the preservation and preferably enhancement of these assets and crucially, of their setting.</p> <p>In some instances, a full consideration of setting may require close co-operation with adjoining districts where landscape setting may fall within the boundary of these neighbouring authorities. Where relevant, we will seek evidence of this cross-boundary co-operation in the evidence base.</p> <p>We also encourage a policy that addresses the potential listing over the plan period of as yet unidentified heritage assets that further</p>	

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			<p>demonstrate the development and activity of the town and its inhabitants.</p> <p><b>Conservation Areas</b> Each local authority contains a number of designated Conservation Areas. We encourage that the local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation area's local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special and distinctive character of Conservation Areas, emphasising that this is a cumulative result of built form, materials, spaces and street patterns, uses and relationships to surrounding features such as the surviving historic buildings and street patterns.</p> <p>We would also welcome provision for any future designation of conservation areas within cities, districts and boroughs as well as specific provision for the landscape setting of different parts of the area.</p> <p><b>Registered Parks and Gardens</b> It may be appropriate to specifically identify Registered Parks and Gardens as protected by any such policy. The policy should anticipate and protect any future designations.</p> <p><b>Scheduled Monuments and other Archaeology</b> We welcome specific provision for the protection and enhancement of archaeology as well as emphasis that sites of archaeological importance can occur everywhere. We encourage clear guidance on expectations for archaeological recording and the submission of records with an appropriate public record (e.g.: Historic Environment Records) for archaeological remains that are not to be retained in situ.</p>	

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			<p>Where suggested sites are located in areas of known archaeological potential, weight should be given to this as a consideration in site selection and the comparison with alternate locations. We encourage close liaison with the County Archaeologist at site allocation stage.</p> <p>Policies should make provision for non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets (footnote 63 of the NPPF).</p> <p><b>Non-designated Heritage Assets</b>  In national policy terms, ‘non-designated heritage assets’ (including those on a local list) are recognised as having a degree of significance meriting consideration in planning decisions. Paragraph 135 of the National Planning Policy Framework states that decisions on applications affecting such assets will require a balanced judgment that has regard to the significance of the asset and any harm or loss:  <a href="http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/12-conserving-and-enhancing-the-historic-environment/">http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/12-conserving-and-enhancing-the-historic-environment/</a></p> <p>Government guidance recognises that local lists and local criteria for identifying non-designated heritage assets are a positive thing and can help with decision-making:  <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/what-are-non-designated-heritage-assets-and-how-important-are-they/">http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/what-are-non-designated-heritage-assets-and-how-important-are-they/</a>  Historic England has published guidance pertaining to Local Listing which you may find helpful: <a href="https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/">https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/</a></p> <p>We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets,</p>	

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			<p>and ideally has a local list of assets linked to planning policies in their Local Plan. Robust provision for these heritage assets will increase the soundness of your forthcoming plan.</p> <p><b>Heritage at Risk</b> At present there is no reference to <b>heritage at risk</b> within the Plan. The National Heritage at Risk Register can be found and searched here by local authority: <a href="http://www.historicengland.org.uk/advice/heritage-at-risk">www.historicengland.org.uk/advice/heritage-at-risk</a></p> <p>We strongly recommend the inclusion of a policy to address <b>Heritage at Risk</b>. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified. We also recommend the creation and management of a local Heritage at Risk register for Grade II listed buildings.</p> <p><b>Historic Shopfronts</b> The retention of original/historic or significant shopfronts elements are often integral to the character of these buildings and that of the wider street scene. The Local Plan should highlight the importance of retaining or restoring historic shopfront features. This is both in terms of the positive contribution historic shopfronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners.</p> <p>A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored.</p>	

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			<p>More recently our High Street Heritage Action Zones across the country are unlocking the potential of high streets, fuelling economic, social and cultural recovery and breathe new life into it for future generations.</p> <p><b>Management Plan for Historic Core</b> We welcome the reference to the progression of a <b>Management Plan for the historic core.</b></p> <p><b>Heritage Impact Assessments</b> We broadly welcome the <b>Strategic Heritage Impact Assessment</b> 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. We have some concerns about the way in which some aspects have been defined as important/critical and others contributory of minor. For example, in our view the rising hills to the south of the city are of more than a minor element. It is not exactly clear to us how those different elements were attributed more or less import. We suggest that you re-visit the different setting elements of the Strategic</p> <p>We welcome your commitment to complete <b>detailed heritage impact assessments for the site allocations</b> on page 221. These should follow the 5 step methodology set out in our HE Advice Note 3 – site allocations in local plans: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a></p> <p>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 intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer</p>	

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			<p>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. Cumulative effects of site options on the historic environment should be considered too.</p> <p>The following broad steps might be of assistance in terms of assessing sites:</p> <ul style="list-style-type: none"> <li>• Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale</li> <li>• Assess the contribution of the site to the significance of heritage assets on or within its vicinity</li> <li>• Identify the potential impacts of development upon the significance of heritage asset</li> <li>• Consider how any harm might be removed or reduced, including reasonable alternatives sites</li> <li>• Consider how any enhancements could be achieved and maximised</li> <li>• Consider and set out the public benefits where harm cannot be removed or reduced</li> </ul> <p>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.</p> <p>We would welcome the opportunity to discuss the scope of this next stage of HIA to ensure that the right sites are covered and in a proportionate way.</p>	
222	Policy GP/CC Adapting heritage assets	Object	We welcome the proposals to include a policy for adapting heritage assets to Climate Change.	<i>Consider incorporating suggestions into policy wording.</i>

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	to climate change		<p>We broadly support the proposed policy direction. In developing your policy in this area we offer the following advice:</p> <p>Historic England recognises that by caring for and reusing our heritage assets, energy and carbon dioxide can be saved through better maintenance, management and energy efficiency measures.</p> <p>One of Historic England's key messages on climate change is the need to articulate an evidence-based case for the importance of the historic environment in respect of the embodied carbon value of historic buildings. In particular the contribution that the retention and reuse of old buildings makes, together with the sustainability of traditional building materials and design.</p> <p>A sustainable approach to climate change mitigation measures should aim to secure a balance between the benefits such development delivers and the environmental costs it incurs. Policies/guidance should seek to limit and mitigate any such cost to the historic environment. When considering energy efficiency measures the benefits of alternative options should be weighed against the impact upon heritage assets and their setting.</p> <p>Policies/text should recognise sustainability over the long-term - historic buildings represent a significant investment of expended energy. Demolishing/replacing requires a major reinvestment of embodied energy and other resources. Planning policies should encourage &amp; recognise the benefits of sympathetic restoration/retention/refurbishment/retrofit of historic buildings, rather than demolition and replacement.</p> <p>Historic England publishes a wealth of information detailing how energy efficiency improvements to historic buildings can be carried out without compromising their significance. Referencing the following links to publications may be helpful:</p>	

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			<p>Energy efficiency and traditional homes, HEAN 14  <a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/">https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/</a>            Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency  <a href="https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/">https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/</a>            Efficiency and Historic Buildings: Energy Performance Certificates  <a href="https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/">https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/</a>            Modifying Historic Windows as Part of Retrofitting Energy-Saving Measures  <a href="https://historicengland.org.uk/whats-new/statements/modifying-historic-windows-as-part-of-retrofitting-energy-saving-measures/">https://historicengland.org.uk/whats-new/statements/modifying-historic-windows-as-part-of-retrofitting-energy-saving-measures/</a></p> <p><u>Part L Building Regulations</u></p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.</p> <p>Special considerations under Part L of the Building Regulations are also given to locally listed buildings, buildings of architectural and historic interest within Registered Parks and Gardens and within the curtilages of Scheduled Monuments. Buildings of traditional construction with permeable fabric, both absorbs and readily allows the evaporation of moisture and can therefore be impacted by changes in climate to a greater degree than modern buildings.</p> <p>In developing policy covering this area, you may find the following Historic England guidance helpful: <a href="#">Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings</a></p>	
247	Policy J/RC Retail and Centres	Comment	See our comments above in relation to historic shop fronts.	

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271	Policy H/HD Housing	Object	We welcome the references to local character considerations. Any policy should specifically also reference consideration of potential impacts on the historic environment, including heritage assets and the wider townscape and landscape. We welcome a Site-specific design led approach with site and area design codes to guide development.	<i>Specifically reference the historic environment as a consideration</i>
273	Policy H/GL Garden land and subdivision of existing plots	Support	We welcome the broad policy approach of resisting inappropriate development of residential gardens and subdivision of existing plots. We note and welcome the reference to the important consideration of factors such as harm to local character and heritage.	
290	Policy H/DC Dwellings in the Countryside	Object	For reuse of buildings in the countryside the policy should also set out the need to consider the historic environment. Buildings may be designated or non-designated heritage assets, or regardless may form part of the local heritage of an area.	<i>Set out the need to consider the historic environment</i>
304	Policy I/ST Sustainable transport and connectivity and Policy I/EV Parking and electric vehicles	Object	<p>Historic England welcomes the plan aim to improve cycling and other sustainable transport infrastructure. Increases in cycling and other sustainable travel modes and the associated reductions in the use of private vehicles can have positive effects on the historic environment. This can be from reduced noise and air pollution, parking, traffic and congestion. Air pollutants can cause buildings and structures to decay. Traffic noise can affect how we experience historic places, and visual clutter from parked cars can affect the settings of historic spaces and how we move around them.</p> <p>In line with national policy and guidance on planning and design, sustainable transport interventions should be designed to protect and enhance the historic environment. This could mean minimising visual clutter, especially from post-mounted traffic signs, and using materials or furniture that is appropriate for the historic environment. Historic England has produced guidance setting out good practice for street management, <a href="#">Streets for All</a> and further information on transport and the historic environment can be found on our <a href="#">website</a>.</p>	<i>Consider incorporating suggestions into policy wording.</i>
352	Glossary	Object	Please add Scheduled Monument and Registered Park and Garden, Significance and Setting to the glossary of terms.	<i>Add terms to glossary</i>