



Historic England

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Dear Greater Cambridge Planning Policy Team

## Draft Greater Cambridge Planning Obligations Supplementary Planning Document 2024

Thank you for providing Historic England with an opportunity to comment on the Draft Planning Obligations Supplementary Planning Document 2024.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

Historic England welcomes the preparation of an SPD for Planning Obligations. However, having reviewed the document we have the following comments to make:

### **Limited reference to the Historic Environment in current Draft SPD**

Having reviewed the Draft SPD there is currently very little reference to the historic environment (with the exception of a reference on page 129 Page 129 to mitigation measures for impacts on the historic environment in the second bullet point).

### **Recommend additional reference to historic environment in SPD**

We recommend that further references are made to the historic environment and opportunities sought to support the historic environment through Planning Obligations where appropriate. This should be both in the SPD itself and in future iterations of the Infrastructure Delivery Plan.

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We recommend that the historic environment should be included as a topic where planning obligations could be sought. Development proposals often impact on heritage assets, and there may be a number of circumstances where monies and/or legal agreements could be secured for enhancement works, management plans, public realm improvement and other aspects. Furthermore, there is overlap between the historic environment and other topics such as green infrastructure and community facilities, so there may be opportunities for pooling of monies for projects that have multiple benefits.

## Examples of how the historic environment might be included

The [Heritage at Risk Register](#) currently includes 3 entries for Cambridge City and 19 for South Cambridgeshire including a number of churches, several scheduled monuments, listed buildings and conservation areas. The list changes each year and more assets can be added to the list.

For example, opportunities can be sought to address heritage at risk through mitigation for planning proposals. An example in this regard would be proposals to improve the management of and access to heritage assets including for example scheduled monuments or registered parks and gardens which may be impacted by proposed development.

Development specific planning obligations and S106 agreements will continue to offer opportunities for funding improvements to heritage assets and the mitigation of adverse impacts on the historic environment. These may include, but are not limited to, archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. We recommend that you highlight this in your SPD.

## Policy framework for historic environment and application of S106

Paragraph 203 of the NPPF requires that local authorities set out in their Local Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In relation to S106, this means ensuring that the conservation of its heritage assets is taken into account when considering the level of the S106 to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment.

NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ... "



Historic England considers cultural infrastructure to include all heritage assets within the Plan area. The importance of cultural infrastructure to the character, authenticity, creativity and general attractiveness is widely, and increasingly recognised (for example, London now has a [Cultural Infrastructure Plan](#)), as is the importance of cultural infrastructure to economic activity and the health and wellbeing of communities. A wealth of information on the value of heritage to our economy, society and environment has been published as part of by Historic England's [Heritage Counts](#) project.

While it is difficult to quantify a requirement for cultural infrastructure, given the importance of cultural infrastructure, as identified in the NPPF, Historic England asserts that it would be reasonable to expect the plan to aim to at least maintain existing levels of cultural assets that exist within the Plan area, and to seek improvements to secure the long-term future of assets classed as 'at risk'.

Clearly, regimes for the protection of heritage assets are already in place. However, for heritage assets that are identified 'at risk', while a range of mechanisms may be used to save these assets, none of these are guaranteed. Therefore, Historic England is keen that any opportunity to save heritage assets is explored.

To this end, we would suggest that you consider adding to the IDP any heritage assets that have been identified as 'at risk', either at national level, by Historic England, or locally, by your Council.

We encourage the council to ensure that the conservation of the historic environment is taken into account when determining if S016 obligations should be imposed, in order to safeguard and encourage appropriate and viable uses for vacant or underused heritage assets.

Historic England therefore encourages authorities to consider identifying the ways in which S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy (NPPF paragraphs 8, 20 and 203).

It is now well established that heritage is not an adjunct to a healthy economy but an important component of growth, a source of employment and a community resource. We therefore suggest that the Council should consider whether any heritage - related projects within the district would be appropriate for S016 funding.



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### Local Plan Evidence Base

The Local Plan's evidence base may demonstrate the specific opportunities for S106 to help deliver growth and in so doing meet the Plan's objectives for the historic environment. Historic England requests that the infrastructure lists contained in future Infrastructure Delivery Plans include reference to 'improvements to heritage assets related to social, economic or environmental infrastructure' as a type of infrastructure project which the authority intends may be wholly, or partially, funded by S106.

### Involvement of Council Conservation and Archaeological Staff

We advise that the conservation and archaeological staff of the Council are involved in the preparation of the SPD and its assessment. They are best placed to advise on local historic environment issues and priorities, as well as identifying opportunities for securing wider benefits for the future conservation and management of heritage assets within the borough.

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

If there any issues you wish to clarify or discuss, please do not hesitate to contact me.

Yours sincerely

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