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Dear Local Plan Team

Greater Cambridge Draft Local Plan (Regulation 18) December 2025

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

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

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

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

We recognise the area faces intense pressure for growth, driven by both the economic success and the attractiveness of the area, in large part a consequence of its rich architectural and cultural heritage. We are keen to support sustainable growth in the right locations, but this growth must be carefully managed to ensure that the very things that contribute to the success of the City and surrounding area are not harmed in the process.

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

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

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heritage matters.

As a general comment, Historic England very much welcomes the emerging plan and the considerable work undertaken to date. We can see the incorporation of many of the comments we have made in previous consultations which is appreciated. We particularly welcome the substantial effort that has been made in preparing a comprehensive evidence base including both strategic and site-specific heritage impact assessments, topic papers, skyline and tall buildings strategy, townscape characterisation study, landscape sensitivity assessment including renewable energy assessment.

Beyond that, based on our review we have identified five key issues to be addressed in progressing the next iteration of the Plan.

1. Site Allocations – particularly policy wording for sites
2. Historic Environment Section
3. Tall Buildings and the Skyline
4. Approach to renewable energy schemes
5. B8 Employment uses

These issues are explored in more detail below.

This letter should be read in conjunction with **Appendix A** which provides more detailed comments on these and other more minor issues.

Key Issues

1. Site Allocations

a) Heritage Impact Assessments (HIAs)

We welcome the preparation of HIAs for many of the site allocations in the Plan. In reviewing the Plan, we have focussed on checking that the recommendations from the HIAs are included in Policy wording. On most occasions, recommendations have been included which is welcomed. We have tried to highlight areas which still need to be included but we recommend that you also verify this prior to Regulation 19.

There are a few sites where there is no HIA. We appreciate that some of these are policy areas. In those cases, we would suggest that the policy should still include reference to nearby heritage assets and potential mitigation measures and enhancements that will be sought in the policy areas.

There do not appear to be HIAs for two University Sites in Cambridge – Mill Lane and the Museums sites. We appreciate there may be a reason for this but would nonetheless recommend that an HIA should be prepared for each of these sites.

For some sites the policy wording states that a Heritage Impact Assessment will be required (e.g. North Cambourne/Grange Farm). This is a helpful requirement, but we suggest adding the words 'more detailed HIA', given that an HIA has already been prepared for these sites. The policy should also make clear that the HIA is needed to inform the masterplanning/proposals.

b) Policy Wording for sites

We welcome that many of the policies refer to heritage as well as potential mitigation and enhancement measures identified through the HIAs.

However, as currently drafted,

- i. Some of the policies are quite vague and generic
- ii. Some of the policies do not currently include all of the recommendations including diagrams from the heritage impact assessments.
- iii. Some of the policies are imprecise about what further evidence may be needed, when and why.

Therefore, the policy wording could usefully be further tightened and strengthened to ensure that robust policies are in place that will promote opportunities where these heritage assets can be used to support sustainable growth (including heritage-led regeneration) and secure the benefits of positive placemaking within the historic city and wider sub region.

For policies to be effective, it is important that they include sufficient information regarding criteria for development. Paragraph 16d of the **NPPF** (Feb 2025) states that policies should provide '*a clear indication of how a decision maker should react to a development proposal*'.

Planning Practice Guidance Paragraph: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019 also makes it clear that, '*Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development.*'

Historic England's Advice Note on Site Allocations [HEAN3](#) (referenced in Planning Practice Guidance Paragraph: 045 Reference ID: 61-045-20190315 Revision date: 15 03 2019) makes it clear that assessment should consider maximising enhancements and avoiding harm through (amongst other things) identifying design requirements including open space, landscaping, protection of key views, design, layout etc.

The advice note also includes a section on site allocation policies at paragraphs 3.1 – 3.2. It states, '*The level of detail required in a site allocation policy will depend on aspects such as the nature of the development proposed and the size and complexity of the site. However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward including phasing. **Mitigation and***

enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.'

In terms of heritage policy wording for sites, we recommend:

- i. use the phrase 'Conserve or where appropriate enhance...'
- ii. mention specific heritage assets
- iii. specify appropriate mitigation and enhancements as identified through the HIA
- iv. refer to the HIA (with hyperlink)
- v. use Concept diagrams to illustrate key site considerations/ recommendations

Where a site has the potential to affect a heritage asset, we would expect to see the following typical wording within the policy:

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 setting. Appropriate mitigation [and enhancement] measures identified in the Council's Heritage Impact Assessment [insert HIA hyperlink] including [add recommendations from HIA for mitigation and enhancement...] will be required.'

For larger sites, or where there are very complex heritage issues, we would expect to see a policy requirement for masterplanning informed by both the Council's HIA and also a further, more detailed, heritage impact assessment as well as Historic Landscape Characterisation and Landscape Character Assessment. Typical wording might be:

Historic Landscape Characterisation, Landscape Character Assessment, more detailed Heritage Impact Assessment and Archaeological Assessment must be undertaken to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation and enhancement measures. The Council's HIA and the results of these further assessments must inform the masterplanning for the site.

We welcome the inclusion of a criterion relating to archaeology where needed. However, the policy wording does not always clearly say when the assessment is needed, nor is it clear that the assessment should, for example, inform the masterplan or site layout. Please amend the wording to indicate what level of assessment likely to be required (desk based/field evaluation), when (pre-determination/as condition) and why (to inform masterplanning/site layout etc).

Please revisit the policies to further tighten and strengthen the wording. We would be happy to review draft wording prior to the Regulation 19 consultation.

2. Historic Environment Section

We welcome the inclusion of policies for the historic environment. We broadly support the draft policies to date although we offer the following suggestions as to further enhancements:

- i. Policy wording should have a more local flavour whilst being consistent with the NPPF. Heritage policies should be more spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation.
- ii. The Strategy policy could make more of opportunities to enhance the historic environment. This might include recognising its important role in placemaking and the contribution made by heritage to well-being as well as to the economy. The strategy should also acknowledge the increased pressures being placed on existing heritage destinations and promote and facilitate greater access to other heritage sites in order to reduce the current pressures on honeypots.
- iii. The part of the policy and supporting text relating to enabling development should be deleted.
- iv. Additional clarification is needed regarding the identification of non-designated heritage assets
- v. Include link to your Local List criteria

3. Tall Buildings and the Skyline

We welcome the inclusion of a policy for tall buildings and the skyline.

We are keen to support growth in appropriate locations whilst protecting and enhancing what is important in relation to the skyline of the City and surrounding area. Cambridge is set within a low-lying landscape. Much of the city is hidden within a well treed skyline, punctuated by a few landmark buildings. Many (particularly in the historic core) are also highly graded heritage assets and well-known features on the skyline. Maintaining the settings of these heritage assets, including how they sit within the skyline, particularly from key views in and out of the City, will be important.

In the wider area, we are seeking to ensure that the rural character of the area is maintained and that even within the new settlements, buildings do not over-dominate the wider landscape and have a negative impact on the historic environment. The relatively flat nature of the area means that impacts can be felt over considerable distances.

We welcome the detailed work that has been undertaken to prepare an evidence base in the form of the Skyline and Tall Buildings Baseline, Strategy and Guidance (although the detail is, at times, hard to follow – we recommend an executive summary is prepared to draw out the main points).

We note that the Local Plan policy wording itself is very similar to the previous Local Plan, albeit with greater emphasis on design quality and the addition of a further criterion relation to suicide prevention. We welcome the reference to the historic environment in criterion b of the Policy.

The policy seeks to avoid taller development in the historic core, helping to protect and enhance the skyline and the setting of key heritage assets in that area which is broadly welcomed. Likewise, the policy seeks to protect important views into and out of the centre, through the strategic views, which is welcomed.

We recommend some minor changes to wording as set out in our detailed comments at Appendix A.

More generally, we consider that the policy currently underplays the semi-rural nature of parts of Cambridge and the surrounding area. In addition, development should be seen as an opportunity to enhance Conservation Areas and the skyline of the city in general. Finally, it will be important that increases in height do not affect our experience and perception of coalescence between the city and surrounding villages. The policy should be amended to better reflect these three points.

We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion.

We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east.

Similarly, unless the Strategic Enhancement Areas start to deliver a softening of the landscape e.g. around Addenbrookes, we will have ongoing concerns about heights of development in the proposed CBC extension to the south of Addenbrookes.

In relation to new settlements, there will still need to be some caution in relation to heights owing to nearby Conservation Areas and other heritage assets such as the Roman Road. In particular, we note that the Strategy does not consider Grange Farm. This needs to be addressed prior to Regulation 19, perhaps through an addendum to the Strategy.

Finally, there must be a clearer statement in both the Local Plan and also the Tall Buildings Strategy that the heights explored within the evidence base would need to be tested on a case-by-case for site-specific proposals and that the STBS is only one of a number of factors to be considered in determining the most suitable design and heights for a particular site.

We want to be able to support you in delivering much needed housing and growth in the city. In order to do so it would be helpful to discuss the evidence base. We would therefore welcome discussion with GCSP prior to regulation 19 to better understand the Strategy, how it was developed and its conclusions. This will help to clarify the extent of our concerns and to explore with you how they might be addressed.

4. Policy LP 17 Approach to renewable energy schemes

Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy.

Our advice note [Commercial Renewable Energy Development Historic Environment Advice Note 15](#) provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans.

Recognising the challenges in preparing a detailed and thorough assessment of heritage at a strategic scale, we consider that the mapping represents a helpful starting point, although there are some limitations. However, given the limitations of the mapping it is very important that the plan includes suitable strong caveats to help explain these limitations and also to set out what further heritage assessment will be needed at planning application stage.

This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key of the policies map. We welcome references to heritage in the policy. However, we suggest a number of changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust. See Appendix A for further details.

5. A14 Employment Sites

We appreciate that the introduction of B8 uses (albeit for local use) is something of a departure from previous employment policy in the Cambridge area. This potentially brings additional impacts on the historic environment, given the typical scale and massing of such development.

We have some concerns about the employment allocations along the A14, particularly in respect of impacts on some of the churches on the elevated land above the relatively open, flat landscape. The HIA for Slate Farm for example doesn't address this matter, given the assets are at times over 500m, and yet there may still be some wider setting impacts.

We need this issue to be explored further by you so that we may be clearer about the potential impacts for these employment sites. In order to do this, we would request revisiting the HIAs, and to explore this matter further so that we may have sufficient information to reach a more informed position. This should also include further evidence in relation to heights and mass informed by some visualisations.

Sustainability Appraisal

We make the following brief comments and observations based on a brief review:

- a) We note that many of the policies are assessed as having significant positive or minor positive effects. However, there are quite a number of policies where effects are assessed as uncertain.
- b) It would appear that some of the site allocations have been grouped together for assessment (e.g. City sites). This means that it is very difficult to see what the effects of particular site allocation policies would be. We expect future iterations of the SA to consider each site.
- c) The SA would benefit from an overall summary table.
- d) It would be helpful if the SA included a series of clear recommendations for the Regulation 19 version of the Plan.

Other comments

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

Due to limited capacity, we have not been able to review every policy and potential site allocation in detail. Instead, we have focused on policies with the most direct relationship to the historic environment. Please note that absence of a comment on an allocation or document in this letter does not therefore mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.

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

We trust that these comments are helpful to you in developing the Local Plan.

Please get in touch if you would like any clarification on our comments. We would be happy to review any revised policy wording and revised/new HIAs. We would also be grateful for the opportunity to discuss the skyline and tall buildings strategy further with you – please feel free to suggest a possible date for a meeting.

Yours sincerely

Debbie Mack
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