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Dear Local Plan Team

Greater Cambridge Draft Local Plan (Regulation 19) August 2026

Thank you for consulting Historic England on the Greater Cambridge Regulation 19 Proposed Submission 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 a 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. In addition, new settlements are an important feature of the district with their own special identity and are growing rapidly.

Historic England Comments

Historic England recognises 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

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criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.

We have reviewed the Draft Plan and consultation material with a view to providing advice on heritage matters. Our comments below should be read with reference to our previous comments. We do not have capacity to review every aspect of the Plan but instead have focussed our comments on key issues of soundness for the historic environment.

SUMMARY

As a general comment, Historic England welcomes the emerging plan and 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 (HIAs), topic papers, skyline and tall buildings strategy, townscape characterisation study, landscape sensitivity assessment including renewable energy assessment.

Whilst we consider many aspects of the plan to be sound, we have identified issues with some of the policies and site allocations which do compromise the overall soundness of the plan, and where some small changes would, we believe, bring an enhancement and increase soundness.

Under paragraph 36 of the NPPF some aspects of this Plan are in our view, unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy. We have identified below some of the key areas where we find the Plan **unsound** and what measures are needed to make the Plan sound.

In summary we highlight the following three issues namely

Beyond that, based on our review we have identified three key issues to be addressed in

1. **Site Allocations**
2. **Policy GP/HA: Designated heritage assets**
3. **Approach to renewable energy schemes**

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 issues. Some of these are more minor and some are factual/textual changes.

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Key Issues

1. Site Allocations

There are a number of site allocations where we have suggested some changes to policy wording, supporting text or the Strategic Framework diagrams. In particular, we highlight the following three sites (although there are other site-specific issues raised in Appendix A).

a) **Cambridge East** - We have highlighted the need to incorporate the HIA recommendations in relation to strategic landscaping, open space to northeast of site and heritage setting for airport buildings within the policy and strategic framework diagram.
b) **Eddington** - We have expressed some concern regarding the inconsistency between the HIA recommendations in relation to height and the draft policy wording.
c) **Grange Farm** We have raised some concerns about the references to the potential for a northern access road close to the Roman Road scheduled monument and impacts on the historic environment. We also highlight some concern regarding the approach to recreational access to the Roman Road.

We have set out a number of suggested changes in order to make the policies sound, both in terms of consistency with the NPPF and also justified by the evidence.

For policies to be effective and consistent with the NPPF, it is important that policies include sufficient information regarding criteria for development, justified by appropriate evidence (the heritage impact assessments). Paragraph 16d of the **NPPF** 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: 61-002-20190315Revision 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****.'*

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2. Policy GP/HA: Designated heritage assets

Criterion 5 Whilst we appreciate that you have deleted the words Enabling Development, and essentially summarised the enabling development policy, we continue to advise that this whole criterion should be deleted. We recognise that you are seeking ways to support heritage and this is a laudable ambition. Nonetheless, reference to enabling development is not appropriate within the Local Plan context. By definition, within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy. We are therefore of the view that a policy on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include reference to enabling development with a a policy.

3. Policy LP 17 Approach to renewable energy schemes

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

Whilst we welcome changes to paragraphs 4.45 and 4.50 in relation to the historic environment and need for heritage impact assessment, the Policy itself must also include reference to the need for detailed heritage impact assessment.

Further to recent discussions with the Council regarding the District Heat Network, we have recommended some the changes to Policy wording and supporting text.

Sustainability Appraisal

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

a. The Summary Sustainability Appraisal Table on page 17 pf the Non-Technical Summary is welcome and useful is providing a brief overview of the SA. However, the title for Table 2 on page 17 is incorrect – Table 3 relates to cumulative effects, not table 2.
b. We note that each site has now been assessed separately which is welcomed.
c. 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.

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

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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 welcome a meeting to discuss our comments and to commence work on a Statement of Common Ground to address our comments. Please get in touch to suggest a possible date for a meeting.

Yours sincerely

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